

Exhibit 1

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY LICENSING BOARD**

IN THE MATTER OF
HOLTEC INTERNATIONAL

(Consolidated Interim Storage Facility)

Docket No. 72-1051

May 11, 2020

DECLARATION OF TOMMY TAYLOR

1. My name is Tommy E. Taylor and my business address is 6101 Holiday Hill Road, Midland, Texas 79707. I reside at 4100 Timberglenn Circle, Midland, Texas 79707. I am Vice President of Fasken Management, LLC, which is the general partner of Fasken Land and Minerals, Ltd. (Fasken). I am authorized by the business to execute this declaration on its behalf and on behalf of the Permian Basin Land and Royalty Owners and Operators Coalition (PBLRO) of which Fasken is a member.
2. This declaration is in support of Fasken's and PBLRO's Motion for Leave to File New and Amended Contentions in the Holtec proceedings and to contest Holtec and ISP/WCS applications for the construction and operation of a consolidated interim spent fuel facility (CISF).
3. Fasken is engaged in ranching as well as oil and gas extraction and production activities. PBLRO is an association that formed in response to the CISF applications of Holtec and ISP. D.K. Boyd, a member of PBLRO and with whom I am personally familiar, owns property adjacent to the ISP site. I am also personally familiar with the other sixty-five members of PBLRO and the nature of their oil and gas business activities in the Permian Basin and of their ranching and grazing activities which take place as close as within five miles of the site.
4. The business owns and/or leases property directly related to oil and gas activities, including the Baetz Federal lease, that is/are located approximately 2 (two) miles from the Holtec site. The attached map shows Fasken's acreage in 3.5 sections (over 2,000 acres) located directly west and adjacent to the proposed site. It has 4 producing wells on this acreage and many potential locations from established drilling islands. There are also several plugged and abandoned wellbores (20) on this same acreage.
5. My understanding is that Holtec and ISP plan to establish a facility at their respective sites to store spent nuclear fuel from commercial reactors in the United States.
6. I understand that a radiation release from the Holtec facility and/or the ISP facility or during transportation of spent nuclear fuel through or near the Permian Basin may contaminate the areas in which Fasken and other members

of PBLRO have ranches, oil and gas property interests and/or extraction and production facilities.

7. A radiological contamination event has the potential to interrupt or foreclose further oil and gas extraction/production activities thereby diminishing or eliminating the economic value of the oil and gas assets of Fasken and other members of PBLRO.
8. A radiological contamination event has the potential to interrupt or foreclose further ranching and grazing activities thereby diminishing or eliminating the economic value of the real property interests of members of the PBLRO.
9. Fasken drilled its first oil well in the Permian Basin 70 years ago and its first well in the vicinity of the Holtec site in 1979. As part of Fasken's activities near the Holtec site, Fasken employees, including myself, routinely go to this area for work related purposes. Fasken employees make routine checks on oil and gas production equipment and inspect and conduct maintenance and/or repairs as needed.
10. As a petroleum engineer, I am personally familiar with the development of oil and gas and of the 120 individual persons required on-site in order to facilitate the drilling and completion of each individual oil and gas well. And, any new wells in the region, from staking the site to drilling the well to completion, would require additional employees.
11. I am concerned that radiological contamination also has potential human health effects that may cause death, radiation related ailments and/or genetic defects. This potential, in addition to the impacts on human mortality and morbidity rates, also has economic costs associated with medical care and treatment of radiation related conditions that affect Fasken and other members of PBLRO.
12. Additionally, because a permanent repository for final disposition of spent nuclear fuel is neither built nor licensed, I am concerned that any so-called "interim" facility will become a permanent facility for spent nuclear fuel. Neither the Holtec nor ISP facility is intended or constructed for permanent disposition of spent nuclear fuel. Because a so-called "interim" facility is presently inadequate to protect from radiological hazards caused by either intentional or unintentional conduct during the term of the proposed license, the applications provide no indication that in the future protection from radiological hazards will increase. As the CISFs receive more waste over time, the amount of radiation will increase thereby making the CISFs more hazardous. This means that the radiological hazards effectively increase over time.
13. In order to assure that the licensing decision in this matter adequately protects the interests of Fasken and other PBLRO members in an environment free from radiation hazards associated with CISFs and to protect the economic interests of Fasken and PBLRO, to which Fasken belongs, I am authorized to effect Fasken's efforts in support of PBLRO's participation in the above-captioned NRC docket.

Under penalty of perjury, the above is true and correct to the best of my knowledge and understanding.

Tommy E. Taylor

Declarant: Fasken Land and Minerals Ltd.
By Fasken Management, LLC, its General Partner
Tommy Taylor, Vice President

May 11, 2020
Date

