

Diaz Toro, Diana

From: Doug Pavlick <Doug_Pavlick@cameco.com>
Sent: Monday, July 26, 2021 9:57 AM
To: Diaz Toro, Diana
Cc: Trefethen, Jean; Walter Nelson; Lewis, David R.
Subject: [External_Sender] RE: Clarification Questions for CBR - July 19
Attachments: Clarification Questions for CBR (July 19) DJP.docx

Diana,

Good morning. Attached are the responses from Crow Butte regarding the clarification questions sent July 19, 2021.

Regards,
Doug

From: Diaz Toro, Diana <Diana.Diaz-Toro@nrc.gov>
Sent: Monday, July 19, 2021 2:53 PM
To: Doug Pavlick <Doug_Pavlick@cameco.com>
Cc: Trefethen, Jean <Jean.Trefethen@nrc.gov>; Walter Nelson <Walter_Nelson@cameco.com>
Subject: Clarification Questions for CBR - July 19

[EXTERNAL EMAIL]

The NRC staff continues to develop the survey methodology to identify sites of significance to the Oglala Sioux Tribe that could be affected by the Crow Butte ISR facility renewed license. In support of this effort, we would appreciate if you can respond to the attached clarification questions at your earliest convenience.

Thank you.
Diana

Diana Diaz-Toro
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Clarification Questions for Crow Butte Resources, Inc.

July 19, 2021

1. Referring to Crow Butte Resources, Inc.'s (CBR's) Nebraska Department of Environmental Quality Underground Injection Control Permit 0122611 for the Crow Butte ISR facility (see Ex. CBR-017 from the 2015 evidentiary hearing), the permit contains a legal description of an area that totals 2,840 acres. Is this the basis for indicating that the size of the license area is 2,840 acres (i.e., is the "license area" the same as the permit area boundary)?

Crow Butte Response: Yes, the license area boundary and permit area boundary are the same. When reviewing the acreage associated with the two, there is a 35 acre discrepancy in the way they were described. The NDEQ UIC permit # NEO 122611 includes legal descriptions for all parcels within the permit, with a combined surface area of 2,840 acres. The SUA – 1534 License Renewal Application imprecisely listed the area at "approximately 2,875 acres".

2. Referring to the 2007 license renewal application for the Crow Butte ISR facility (see Ex. CBR-011 from the 2015 evidentiary hearing), Table 1.3-1 on page 1-2 suggests that there is Federally owned and state-owned land within the license area. However, from the description later in Section 2.2.2 of the application, it looks like Table 1.3-1 reflects land ownership within a 5-mile radius of the license area, and not within the license area itself. Please, confirm if this is correct. Also, Figure 1.3-4 on page 1-9 of the application does not show any federal or state land within the license area. Please confirm there is no federal or state-owned land within the 2,840-acre license area boundary.

Crow Butte Response: Table 1.3-1 on page 1-2 is referring to land ownership within a 5-mile radius of the license area. Within the license area boundary of approximately 2,840 acres there are 40 acres of Nebraska State Game and Parks land, with a legal description of 20 31 51SE4SW4. Please see graphic at the end of this response, from Dawes County Assessor office website. There is no Federal Government land located within the license area. The Federally owned land is U.S. Forest Service land within the 5-mile radius of the licensed area.

3. Please identify any specific areas of the site that would not be available/accessible during a potential tribal site survey because of safety or security reasons (or other reasons).

Crow Butte Response: Areas not available for survey due to safety and security reasons:

- Central Processing Plant building
- Restoration Plant building
- Bone yard fenced storage area
- Research and Development Pond area inside fence
- Commercial Evaporation Ponds inside fence
- All Well Houses and Deep Disposal Houses on site
- Brott Maintenance Buildings and equipment storage area
- Mayfield House and equipment storage area.
- Stetson Homestead & nearby out-buildings

- Any areas in wellfield that may be undergoing maintenance repairs during survey.
4. Referring to the presentation provided by CBR at the May 13, 2021, pre-site visit meeting, where brief comments were made about the construction of the facility, please describe the extent of disturbance during wellfield construction. For example, please explain whether all or most of the topsoil was removed from the entire area during construction of the wellfields and associated facilities, or was soil only removed from specific areas where piping, wells, or header houses, etc., were placed, and to what depth soil was removed, if known.

Crow Butte Response: Construction of wellfields and associated infrastructure (well houses, trunklines, lateral piping runs, valve stations, power lines, and access roads) requires excavation to depths of several feet. For approximately 80% of the area inside individual monitor well rings (i.e., wellfields), topsoil was removed during excavation and put back in place and re-seeded upon completion of construction activities. All (100%) of the area inside individual monitor well rings was disturbed by construction activities and heavy equipment traffic. Additionally, beyond the monitor well rings for each mine unit, extending out to the license area boundary, heavy vehicle traffic and delineation drilling occurred for approximately 40% of that area. Delineation drilling is done to define the boundaries of the ore body. After logging each drill hole, it is plugged and abandoned if no viable ore is detected.

From Dawes County, NE Assessor website – location of NE Game and Parks land within License area

The screenshot displays a web-based assessor interface. On the left, a map shows several land parcels with a red border highlighting parcel 230008141. The map includes labels for 'Squaw Creek Rd' and various section, town, and range coordinates (e.g., Sec:29, Town:31, Rng:51W). On the right, a sidebar contains a 'Results' section with the address '230008141' and PID '230008141'. Below this is a 'dawes Assessor Report' with a 'Parcel Information' table.

Parcel Information	
Parcel ID:	230008141
Book / Page:	2016 / 672;
State Geo Code	0557-00-0-00000-000-0000
Cadastral #	
Images	
Current Owner:	STATE OF NEBRASKA NEBRASKA GAME AND PARKS COMMISSION P.O. BOX 30370 LINCOLN, NE 68503
Situs Address:	
Tax District:	711
School District:	CRAWFORD SCHOOL DIST-71, 23-0071
Account Type:	Game and Parks
Legal Description:	20 31 51 SE4SW4
Lot Width:	N/A
Lot Depth:	N/A
Total Lot Size:	N/A
Neighborhood	0
Market Area	3

At the bottom of the report, it shows 'Assessed Values', 'Lat: 42.645221', 'Long: -103.337370', and 'Site Last Updated: 7/21/2021'.

