

December 29th, 2011

Chief, Rules and Directives Branch  
Mail Stop TWB 5B01M  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Submitted via email to: [ross\\_project\\_scoping@nrc.gov](mailto:ross_project_scoping@nrc.gov)

RE: Scoping Comments for Ross Project EIS, Docket No. 40-9079

To whom it may concern:

Thank you for the opportunity to submit comments concerning the scope of NRC's anticipated environmental impact statement (EIS) for Strata Energy's Ross Uranium Project. I appreciate the opportunity to have my voice heard, and hope that the NRC will listen to public comments, take them seriously, and apply the requests to the EIS. I would like to add, however, that I did not see the public notice for this comment in our local Hulett paper. Instead, I learned about it half way through the comment period from someone who saw the notice in the Casper paper. I seem to remember that at the uranium roundtable sponsored here in our county, the NRC and Strata Energy said that public notices would be in all local papers. The paper that this was published in is a paper that is over 250 miles from the area that will be impacted by this proposed project. I hope in the future that the NRC will publish notices in all 3 county papers, to better serve the public.

To begin with, I oppose the concept of "tiering" off the Generic Environmental Impact Statement, rather than analyzing the individual potential impacts to Strata's specific proposed project area. The potential impacts on critical issues like surface water, ground water, surface land use, transportation on roads, housing, agriculture and tourism, and more are not something that can be considered "generic". Each of these areas of impact needs to be reviewed and researched specifically for our area, special needs, and potential problems. The EIS is a critical part of the permitting process which should allow for citizens of Crook County to be involved in environmental decision-making and to take an active role in government decisions, as well as advocate for measures that protect our homes and community. The purpose of the EIS should be to safeguard the public, not to expedite the permitting process for the uranium companies.

I have been researching the impacts of in-situ leach (ISL) uranium operations since fall of 2007 and have many serious concerns about the ISL process in general, as well as the potential for negative impacts to our area specifically. In general, there are major problems with past and existing ISL sites throughout the US, including the presence of contamination pathways caused by improperly abandoned drill holes, the number of leaks, spills, and excursions of injection and production fluids at ISL mines, the inability of ISL operators to restore groundwater to pre-mining conditions, and the temporary and permanent impacts to land resources.

Specifically, I feel the EIS for Strata's proposed project should carefully review all of the potential negative impacts to our area, including (but not limited to) the following:

- I am concerned about the fact that within the Ross project area there are over 5,000 old drill holes from decades ago, many of which were improperly plugged and abandoned. Unless all of these abandoned drill holes can be located and properly plugged, there is a huge potential for cross contamination between the mining aquifer and those above and below. There are many landowners close to this proposed site, as well as the future expansion area, who have wells that provide water for domestic and livestock usage. The threat of contamination for these wells should be carefully researched and reviewed.
- The potential impact for contamination of surface water should be carefully researched and reviewed, as this area is the headwaters of the Little Missouri River. There are also the artesian wells and other springs that need to be taken into careful account.
- There is a potential impact for aquifer depletion, due to the extremely high consumptive use of water during the ISL processing and restoration phases, which has the potential to draw down the aquifers. The 3% water waste that industry states amounts to millions of gallons of water per year for the planned duration of up to 20 years. The restoration phase is even more consumptive, and can amount to billions of gallons of water wasted. This highly consumptive use of water has a potential to drop the Fox Hills aquifer, which in turn could deplete the aquifers above it. The loss of water for domestic and stock use could have extreme negative impacts for local landowners.
- In terms of water consumption, the EIS should address the cumulative effects of all the industrial use that is currently in operation. The pre-mining drawdown of the Fox Hills aquifer, since 1980, due to the presence of the oil field water supply wells and other usage is already at a 200' drop in level, according to Strata Energy sources. Several landowners in the area have had to redrill to deeper depths or move their wells entirely. To add the high water consumption of an ISL processing site to these current conditions and problems will have an extreme negative impact on our area, and should be carefully researched and reviewed.
- There is a potential impact for aquifer contamination to continue for decades, as current ISL sites have not been able to restore the aquifers to pre-mining condition. Elevated levels of arsenic, molybdenum, selenium, vanadium, and uranium are often present at higher levels than baseline even after groundwater restoration. Additionally because of the mining solution, elevated levels of sodium, carbonate, or sulfate are present. Mining may also increase total dissolved solids and change pH levels. Some have been unable to stop the oxidation process at all, even after the aquifer has been considered "restored". Strata Energy does not propose any new methods for restoration, so the impact from this issue will be extreme.
- There is a huge potential for destruction of county roads from excessive truck and equipment traffic, as well as producing a major dust hazard to the public. Strata's plan to provide help with county road maintenance should be scrutinized heavily and they should be held by legal document to provide assistance in repair, maintenance, and especially dust control.
- There is a potential impact to land surface that will in turn negatively affect the wildlife of the area. Careful studies also need to be made concerning the nesting areas that are presently used at the Oshoto Reservoir by many waterfowl that migrate through and also

remain throughout the summer, and how this will affect the breeding and future of waterfowl populations. Also, careful consideration should be made concerning the proposed location for the storage ponds holding contaminated water, as the currently proposed site is directly next to the current Oshoto reservoir. Careful consideration should be taken as to how Strata will be able to keep the migrating waterfowl from using the contaminated ponds rather than the reservoirs.

Thank you for your time and consideration of these comments.

Sincerely,

Pam Viviano  
735 New Haven Road  
Hulett Wyoming 82710  
pamelav@vcn.com