

**FILED**

SEP 28 2012

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Jim Ruby, Executive Secretary  
Environmental Quality Council

SEP 28 2012

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of )  
)  
STRATA ENERGY, INC., ) Docket No. 40-9091-MLA  
)  
(Ross In Situ Recovery Uranium Project) )  
  
(Materials License Application)

**PETITION TO INTERVENE AND REQUEST FOR HEARING  
BY THE NATURAL RESOURCES DEFENSE COUNCIL & POWDER RIVER BASIN  
RESOURCE COUNCIL**

**I. INTRODUCTION**

Pursuant to 10 C.F.R. § 2.309 and the notice published by the Nuclear Regulatory Commission (NRC, or Commission) at 76 Fed. Reg. 41,308 (July 13, 2011), Petitioners Natural Resources Defense Council (NRDC) and Powder River Basin Resource Council (Powder River) (collectively, Petitioners) hereby submit a petition to intervene and request a hearing in this proceeding regarding Strata Energy, Inc.'s (Strata, or Applicant) uranium recovery license application for the proposed Ross *In Situ* Recovery Uranium Project in Crook County, Wyoming. Petitioners describe their standing to intervene in Section II of this pleading, and set forth their contentions in Section III.

Petitioners submit these contentions because the project jeopardizes their economic and environmental interests. As detailed herein, the Environmental Report (ER), the Technical Report, and the Supplemental Report that comprise Strata's application are inadequate to satisfy the requirements of the Atomic Energy Act (AEA), 42 U.S.C. § 2011, *et seq.*, the National Environmental Policy Act (NEPA), 42 U.S.C. § 4321, *et seq.*, and implementing regulations for these statutes.