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Oct 01, 2012

Jim Ruby, Executive Secretary Environmental Quality Council LQD

OCT 1 2012

September 25, 2010

Nancy Nuttbrock Administrator, Land Quality Division Wyoming Department of Environmental Quality 122 W. 25th St. Cheyenne, WY 82002

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Ms. Nuttbrock,

Thank you for allowing me to make these comments on Strata Energy's Ross ISL project draft permit.

I have grave concerns about this permit, and about allowing this project to go forward. I have outlined some of them below.

- There are, by the companies own admission, thousands of old exploratory drill holes in the proposed permit area. Most were never capped or plugged. This creates a possibility of cross contamination of the area aquifers, especially after mining has begun. As a report by the National Research Council stated, "the primary risk associated with in-situ uranium mining is the potential for contamination of adjacent groundwater".
- Cumulative impacts are a real concern. Already there are several oil wells in the area that are using huge amounts of water. Millions of gallons of water are wasted or contaminated by the ISL process, and millions more in the attempt to restore the water. Is there enough water to support all of these activities without having an impact on local water well production, both for domestic and agricultural uses?
- ISL mining alters the chemistry of the groundwater. This will have significant short and long term consequences.
- To date, no ISL company has been able to restore the groundwater to baseline levels
  and quality. In light of that fact, in this western region of scarce groundwater
  resources, and in view of the recent drought, this is not a wise use of our groundwater.

Thank you for considering my comments.

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Aladdin, Wyoming

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