

IN THEIR OWN WORDS

Powertechs spokesman as quoted in the Rapid City Journal.

Crow Butte is a regional success story.

This isn't a new technology. This isn't a new idea. This has been going on for an extended amount of time.

I worked for 40 + years in the other end of the nuclear industry. The rules were dramatically different. We had a program called lessons learned, which required thorough analysis of incidents and failures with the expected result of preventing similar occurrences in the future. This list of violations at Crow Butte shows years of repeated incidents with the same failures. This is not a nuclear industry standard for success. Any operating nuclear facility with this record would have been shut down years ago.

Unfortunately this industry has not adopted any new technology to reduce these failures. No new ideas have been proposed. In reality this has been going on for far to long.

Why is this happening?

The use of plastic casing at depths beyond the materials capability to support its own weight might be a clue as to why the mechanical failures occur. Standard steel casing will not survive in the environment created by the "benign" addition of carbon dioxide and oxidizers. The chemical industry has been using metals such as Hastalloy, Titanium etc for many years in corrosive environments with few failures. Unfortunately these materials would reduce the profit margin for such short term projects. However remember also that these wells will be capped and left forever with all of the same mechanical problems and no monitoring.

The EPA obviously has no program in place to minimize repeated same source failures.

The NRC has neglected to require the same standards for radioactive material handling in mining as enforced for the rest of the nuclear industry. Without the exceptions granted by both of these agencies, this would be an illegal activity under current law.

We can not rely on these agencies to protect our resources, thus we must require our state and local governments to enact laws to protect us.

Ed Harvey

LICENSE VIOLATIONS AT CROW BUTTE ISL URANIUM MINE (NEBRASKA)

* Jun. 5, 2013: Radiation dose in unrestricted area exceeds 0.02 mSv/h standard

* Mar. 14, 2013: Evaporation Pond 1 liner leak

* Jan. 18, 2013: Well fails mechanical integrity test

* Oct. 24, 2012: Well fails 20-year mechanical integrity test

* Aug. 20, 2012: Well fails 5-year mechanical integrity test

* June 4, 2012: Well fails 5-year mechanical integrity test

* May 25, 2012: Monitor well fails 15-year mechanical integrity test

* Oct. 7, 2011: Monitor well excursion

* Aug. 9, 2011: Exceedance of Well Head Manifold Pressure Limitations

* July 18, 2011: two wells fail 5-year mechanical integrity test

* June 1, 2011: Evaporation Pond 1 liner leak

* May 27, 2011: two Monitor well excursions

* May 24, 2011: Monitor well excursion

* Mar. 16, 2011: Monitor well excursion

* Jan. 13, 2011: Monitor well excursion

* July 8, 2010: Monitor well excursion

* July 6, 2010: Well fails 5-year mechanical integrity test

* June 22, 2010: Excursions at two monitor wells "due to increased groundwater levels"

* June 22, 2010: Monitor well excursion

* June 16, 2010: Excursions at three monitor wells "due to increased groundwater levels"

* June 11, 2010: Evaporation Pond 3 liner leak detected

* May 10, 2010: Well fails 5-year mechanical integrity test

* Apr. 13, 2010: Excursion at monitor well due to "natural conditions"

* Dec. 31, 2009: Evaporation Pond 4 Liner Leak

* Nov. 19, 2009: Well fails 15-year mechanical integrity test

* Oct. 15, 2009: Mechanical integrity test missed for two wells

* June 18, 2009: Evaporation Pond 4 liner leak detected

* June 11, 2009: Monitor well excursion

* June 5, 2009: Evaporation Pond 1 liner leak detected

* April 27, 2009: Monitor well placed on excursion status

* April 17, 2009: Production well fails 5-year mechanical integrity test

* June 4, 2008: Exceedance of Well Head Manifold Pressure Limitations

* May 31, 2008: Monitor well placed on excursion status

* May 23, 2008: \$50,000 penalty imposed for violations [2]

* May 19, 2008: Monitor well placed on excursion status

* April 29, 2008: Five-year mechanical integrity test missed for 42 wells

* September 26, 2006: Monitor well placed on excursion status

- * May 5, 2006: leak detected at Pond 4
- * January 19, 2006: Monitor well placed on excursion status
- * October 27, 2005: Injection well leak detected
- * August 4, 2005: Monitor well placed on excursion status
- * June 28, 2005: Monitor well placed on excursion status
- * June 17, 2005: Monitor well placed on excursion status
- * May 2, 2005: Monitor well placed on excursion status
- * May 14, 2004: leak detected at Pond 1
- * December 23, 2003: Monitor well placed on excursion status
- * December 26, 2002: Monitor well placed on excursion status
- * September 10, 2002: Monitor well placed on excursion status
- * April 4, 2002: Monitor well placed on excursion status
- * December 4, 2001: Monitor well placed on excursion status
- * March 2, 2001: Monitor well placed on excursion status
- * September 10, 2000: Monitor well placed on excursion status
- * May 26, 2000: Monitor well placed on excursion status
- * April 27, 2000: Monitor well placed on excursion status
- * March 6, 2000: Monitor well placed on excursion status
- * July 2, 1999: Monitor well placed on excursion status
- * August 7, 1998: Spill of 10,260 gallons of injection fluid
- * March 21, 1998: Monitor well placed on excursion status
- * August 12, 1997: Discovery of Pinhole Leaks in Upper Liner of Process Water Evaporation Pond

Source: <http://www.wise-uranium.org/umopusa.html#CROWB> [3]

REMEMBER, IF THE PERMITS ARE GRANTED, DUE TO STATE LEGISLATION REMOVED IN 2011, THE DENR WILL NO LONGER HAVE THE AUTHORITY TO DO ANYTHING REGARDING ISL MINING - NO BONDS, OVERSIGHT, OR PENALTIES FOR LICENSE VIOLATIONS.

Be well,

—
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www.dakotarural.org [4]