



GOLIAD COUNTY GROUNDWATER CONSERVATION DISTRICT

118 S. Market St., P.O. Box 562, Goliad, Texas 77963-0562

Telephone: (361) 645-1716 Fax: (361) 645-1772

website: www.goliadcogcd.org | email: gcgcd@goliadcogcd.org

Board of Directors:

President – Wilfred Korth
Vice-President – Art Dohmann
Secretary – Roy Rosin

Directors – Terrell Graham, Ernest Alaniz, Reagan Sahadi, Barbara Smith

April 11, 2023

Texas Commission on Environmental Quality
Office of the Chief Clerk MC-105
P.O. Box 13087
Austin, Texas 78711-3087

Goliad County Groundwater Conservation District (GCGCD) is a governmental body created by the Legislature of Texas to protect and preserve the groundwater of Goliad County.

On December 20, 2020, UEC submitted an application to TCEQ for permit renewal for the authorization of in-situ uranium mining Permit No. UR03075. GCGCD requests that TCEQ schedule a public meeting in Goliad for the benefit of Goliad County citizens.

GCGCD makes the following public comments for the record. In general, it is not clear to GCGCD that the understanding of geology in this area is sufficient to allow for uranium mining in this area as further outlined below. GCGCD requests that this permit application renewal be remanded until the following issues are reviewed and resolved.

1. The geological information in the AOR provided with the permit renewal application for the deep injection wells, permit #WDW-423 and WDW-424 transmitted to GCGCD in 2020 and 2021 shows substantial changes from the geological information provided by the mining area permit UR-03075. The original mining permit application was filed with two faults in the Area of Review (AOR). The contested case regarding this permit only addressed two faults in the AOR. As currently understood, there are many more faults in the AOR.
2. Basic geologic understanding in the AOR appears markedly different in the two permit renewal applications submitted.
3. Whether the use and installation of the injection wells are in the public interest. Public interest regarding this issue includes whether UEC's mining operation or restoration activities will adversely impact the public interest by unreasonably reducing the amount of groundwater available for permitting by GCGCD. Measured groundwater levels have changed markedly since the original permit was filed.
4. The permit renewal application for the mining permit UR-03075 uses the same geologic and water sampling data as was used in the original permit application dated 07/31/2007. Data available to GCGCD does not agree with that the application adequately and accurately describes baseline conditions of the groundwater in the proposed permitted area under applicable requirements. The water sampling data for the mining excursion rings



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and baseline values for restoration was gathered in 2007-2008. GCGCD contends that many values were high due to the exploration borehole drilling occurring at that time which was stirring up the aquifer. GCGCD has periodically sampled several wells in the AOR since 2008 and has noted in the attached graphs an overall improvement of water quality since exploratory borehole were drilled.

5. The application does not meet all applicable criteria related to or required consideration by the Commission prior to issuing a Class III Injection Well Area Permit.
6. The applicant has not demonstrated that the proposed exempted aquifer meets the applicable criteria.
7. The application is not sufficiently protective of groundwater quality.
8. The application does not adequately characterize and describe the geology and hydrology in the proposed permit area, including fault lines, under the applicable rules.
9. The geologic and hydraulic properties of the proposed permit area indicate that the applicant will not be able to comply with rule requirements.
10. The application is not sufficiently protective of surface water quality.
11. UEC's proposal for restoration of groundwater to baseline levels as contained in the permit application is not reasonable and adequate.
12. The applicant's proposed activities negatively impact livestock and wildlife, potentially including endangered species.
13. The applicant's proposed activities will negatively impact the use of property and property values.
14. The applicant's proposed activities will adversely affect public health and welfare.
15. The Gulf Coast Aquifer is an unconfined aquifer in the areas of Goliad County where UEC will conduct UIC [underground injection control] activities. Proposed activities will endanger the Gulf Coast Aquifer in the areas of Goliad County where UEC will conduct UIC [underground injection control] activities.
16. Mining fluids will migrate vertically or horizontally and contaminate USDW [underground source of drinking water].
17. There are USDWs within the injection zones proposed by UEC.
18. USDWs within Goliad County will be adversely impacted by UEC's proposed in situ uranium operations.
19. GCGCD requests a complete review and correction of the geological data and a new set of samples be taken of all wells that will be used in the mining and restoration operation monitoring. Water Samples are to be tested by a certified lab.
20. Cross section maps for production area B show the underlying confining zone to be less than 15' thick in some places. GCGCD requests that monitor wells be installed in sand "C"



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to monitor downward leakage during production of sand B. Underlying monitor wells for sands A, C, & D should also be evaluated.

21. Wells RBLB-2 and RBLD-1 appear to be miss labeled or mislocated.

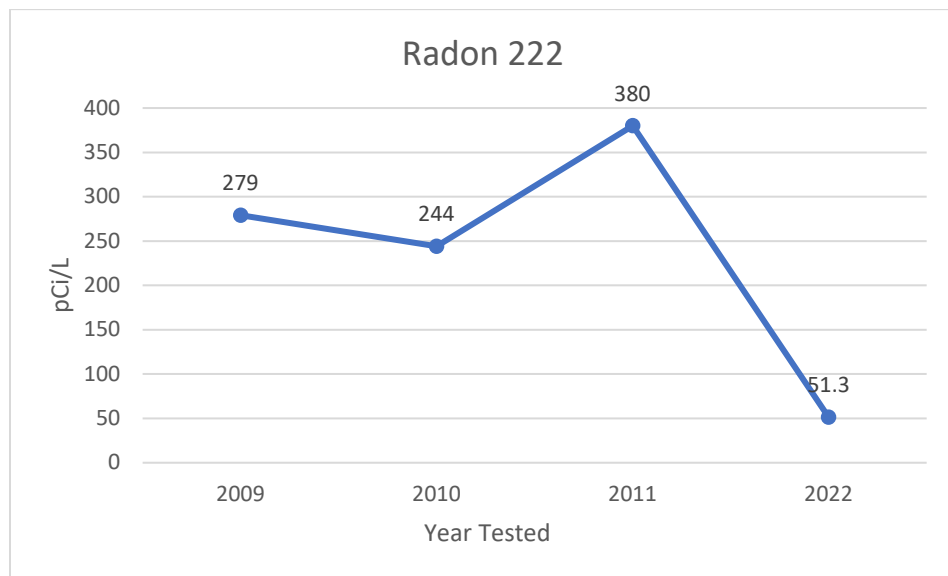
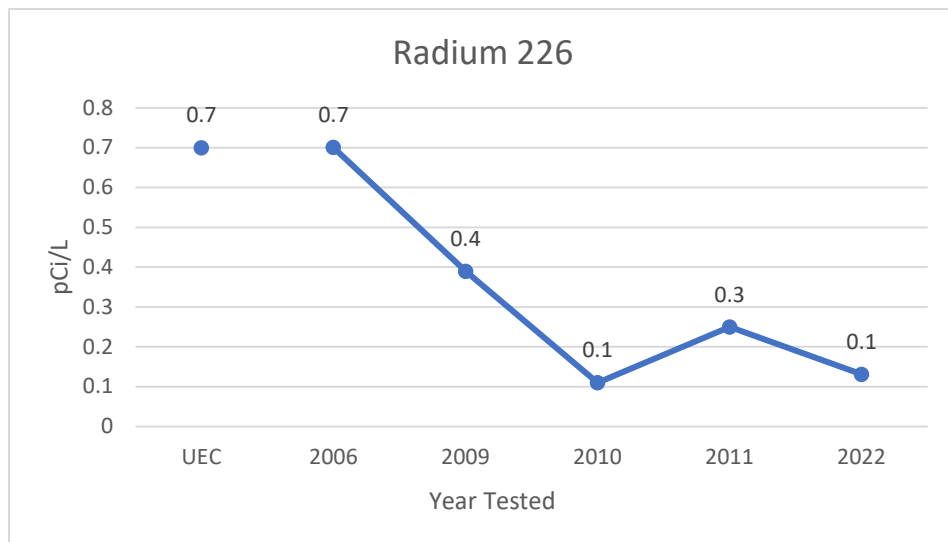
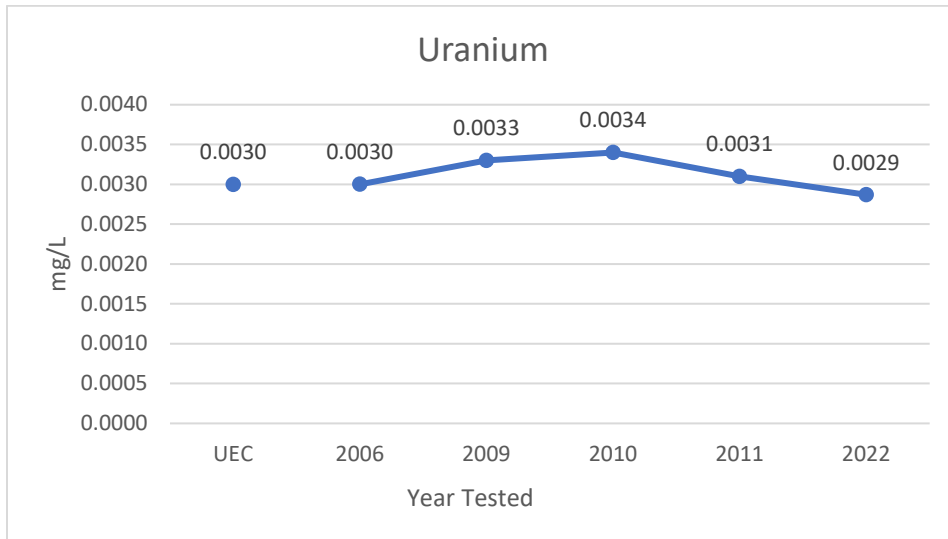
22. There is considerable variability in depth of RBL wells especially for sands C & D and individually RBLA-5. This needs to be compared to geologic data. Is there an excursion control issue with level changes and faulting?

Again, GCGGD is requesting that these issues be reviewed and resolved. GCGCD is also requesting a public meeting in Goliad County concerning the renewal of Permit No. UR03075.

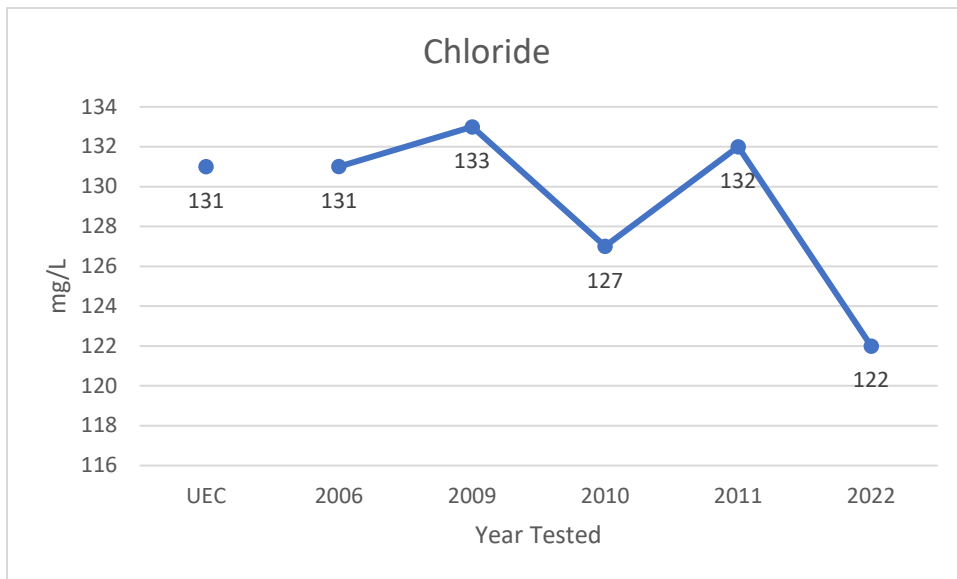
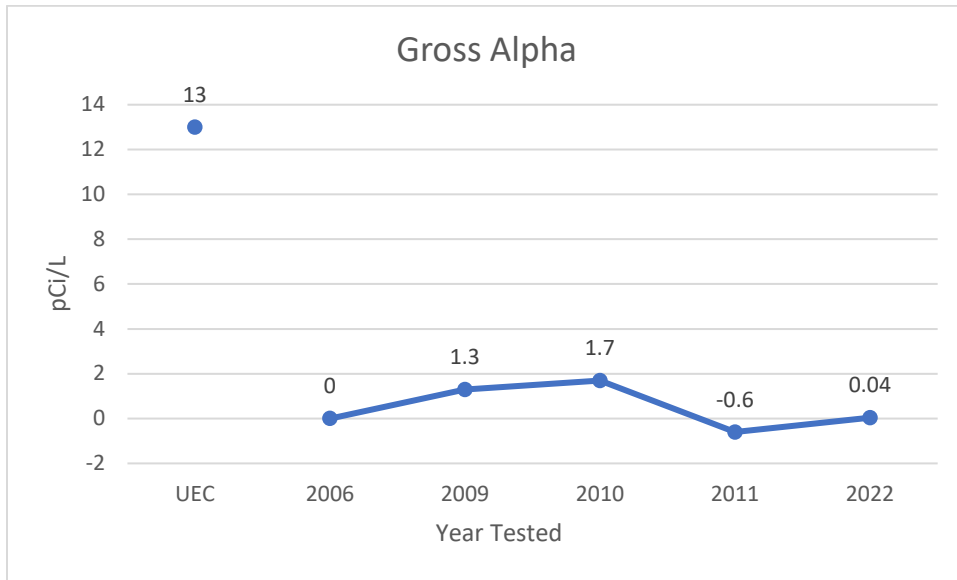
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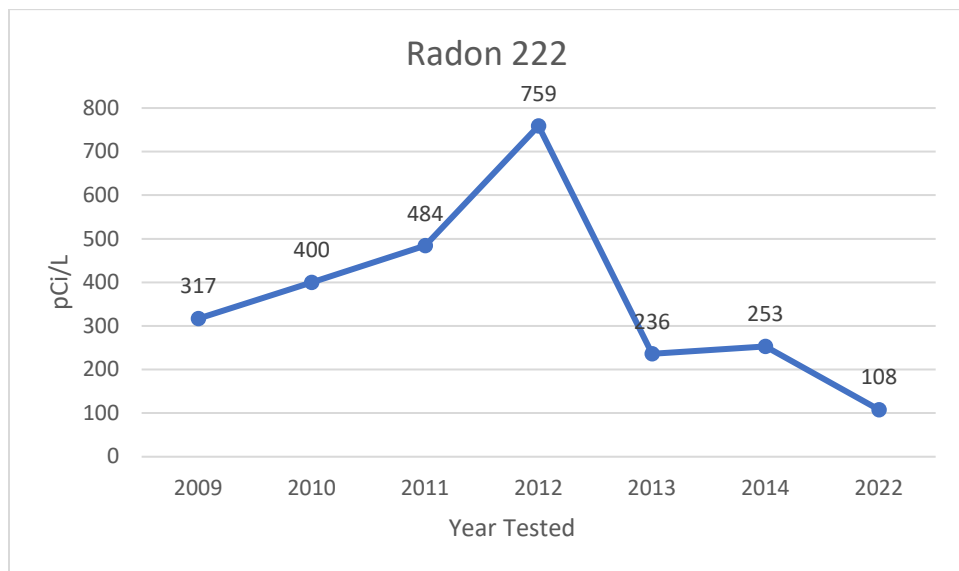
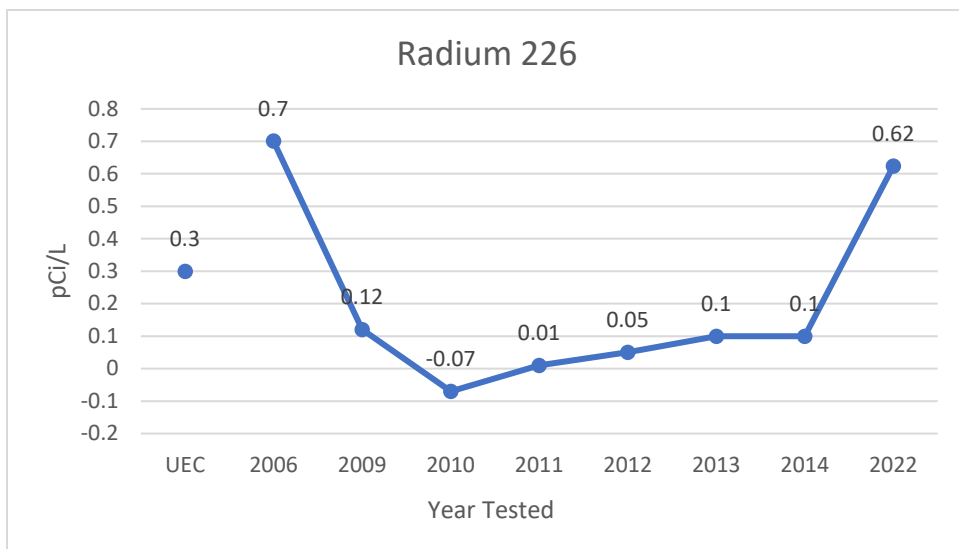
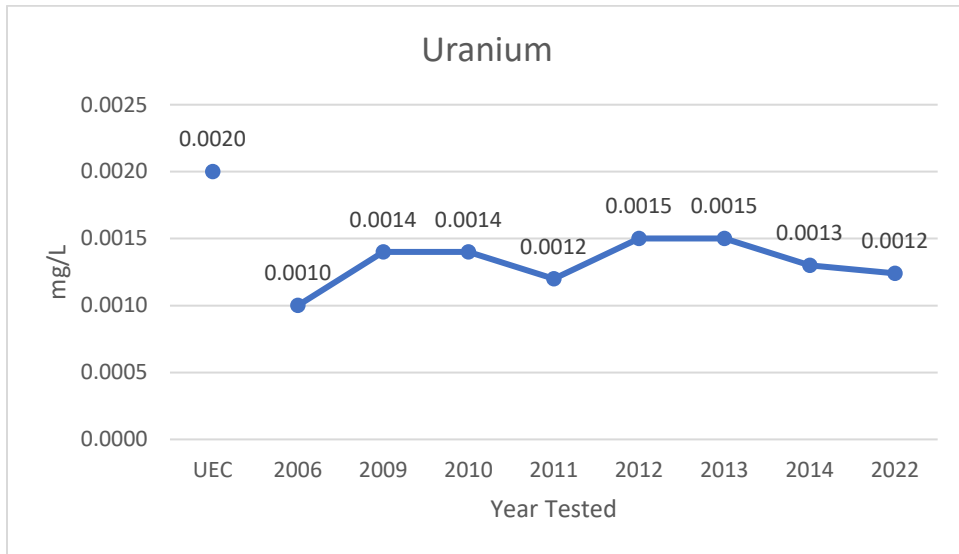
Wilfred Korth

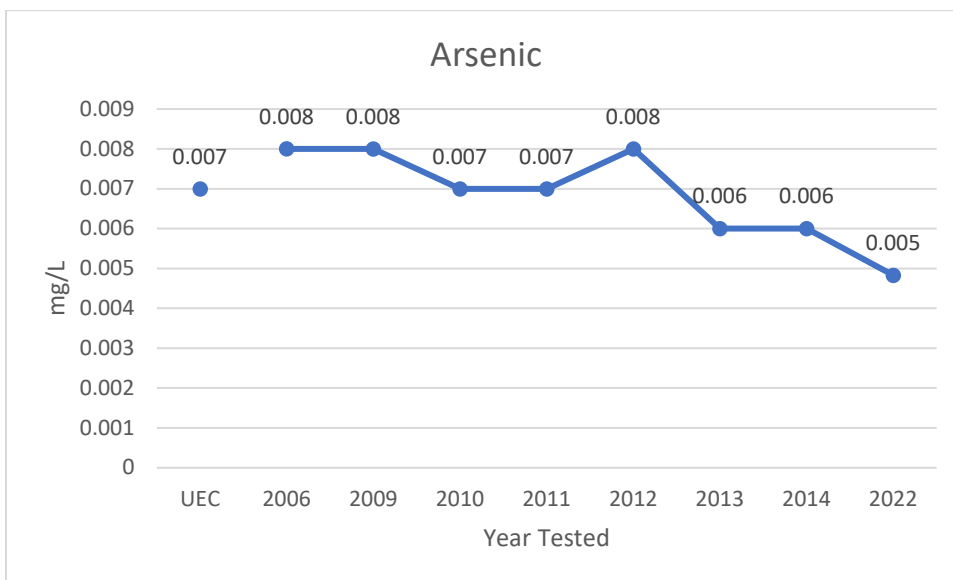
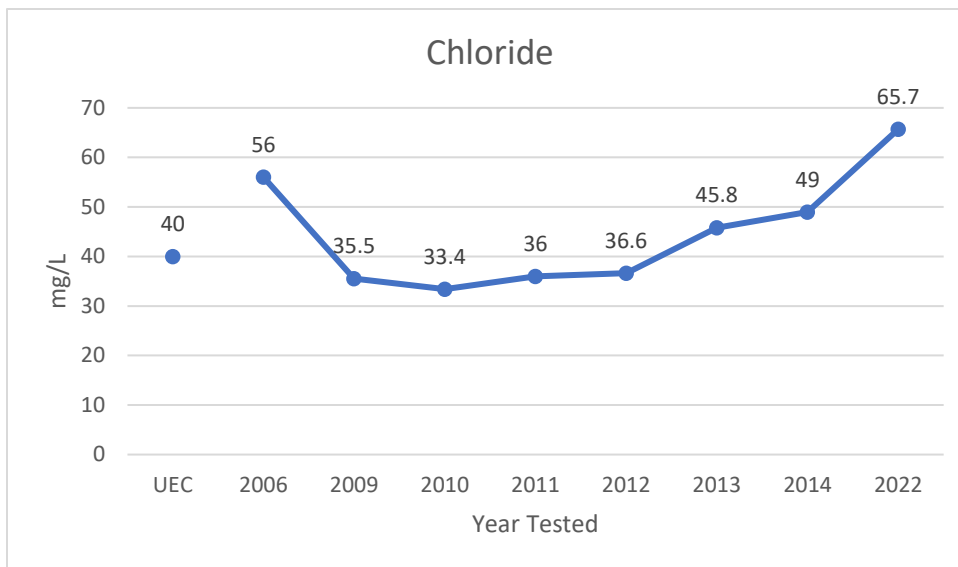
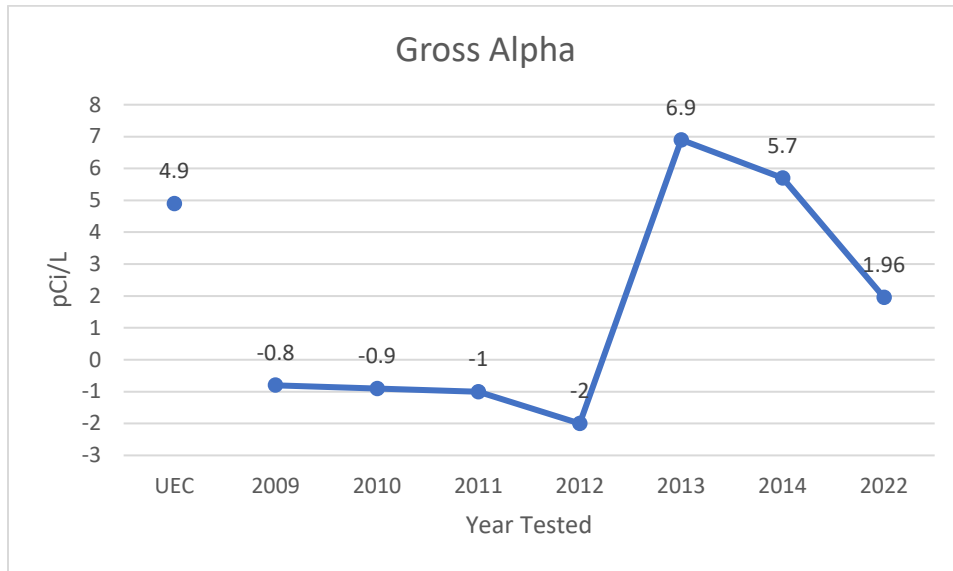
GCGCD President



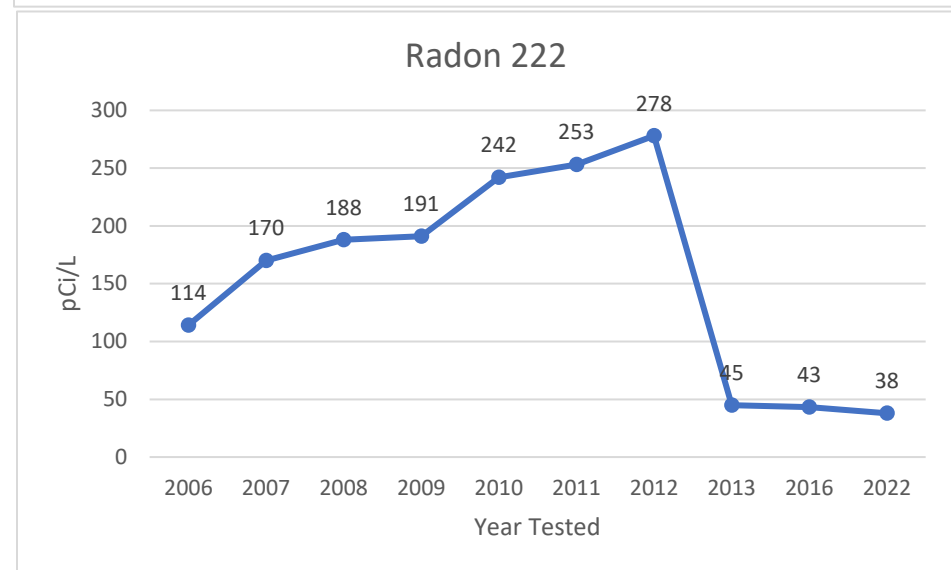
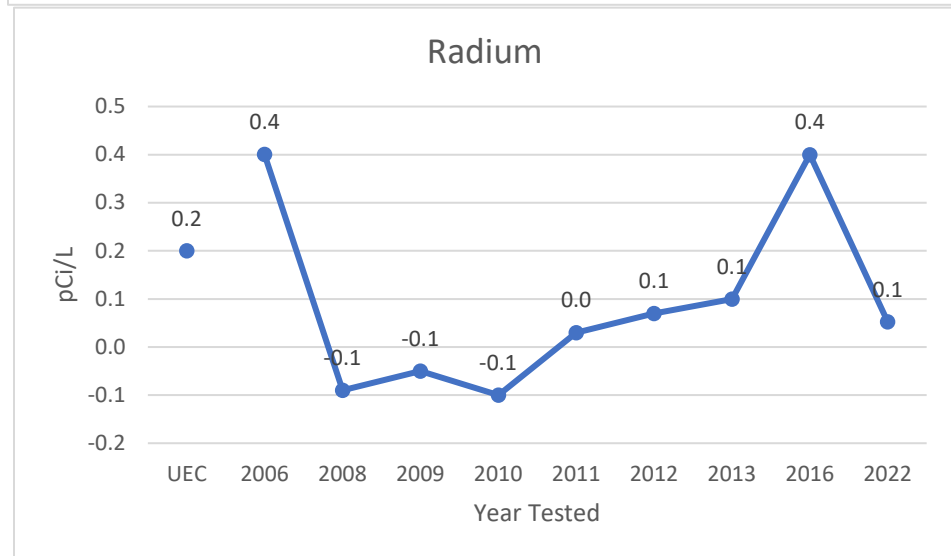
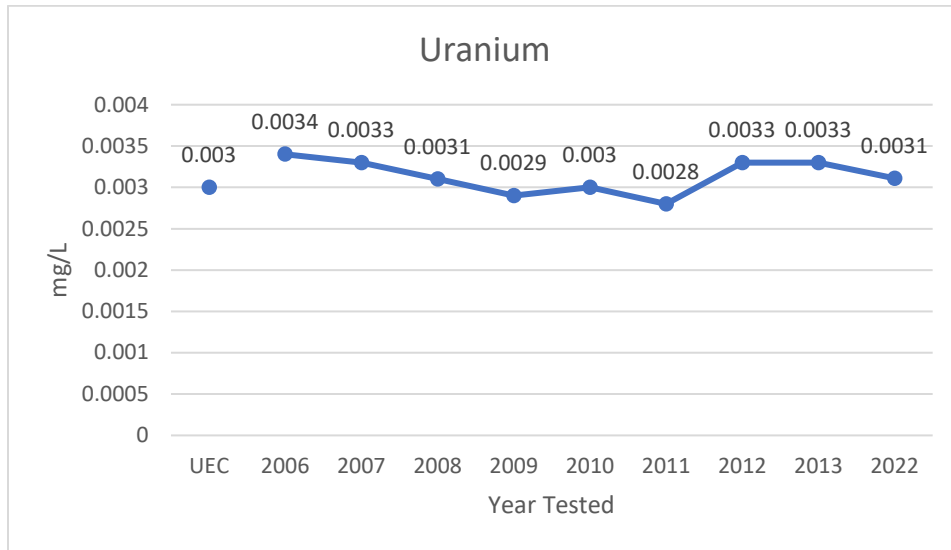
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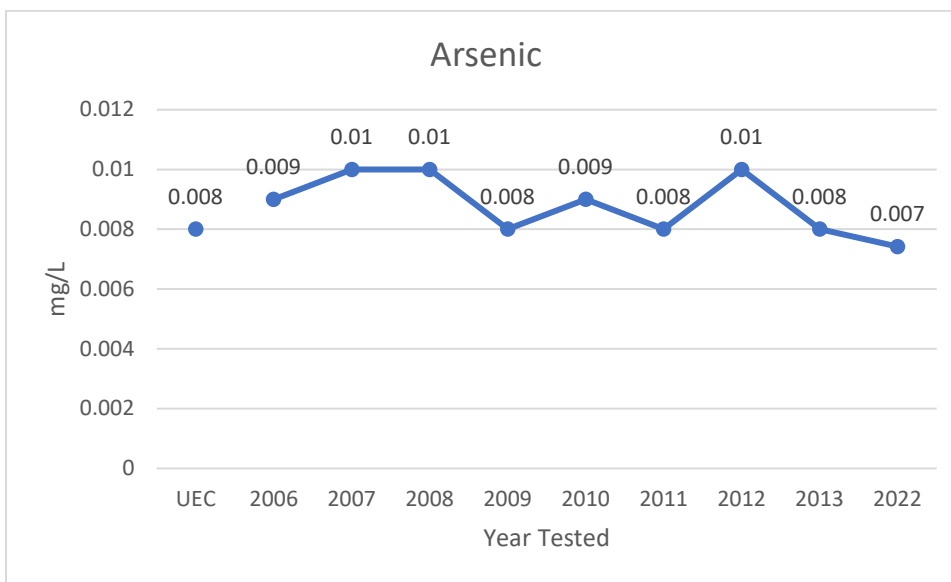
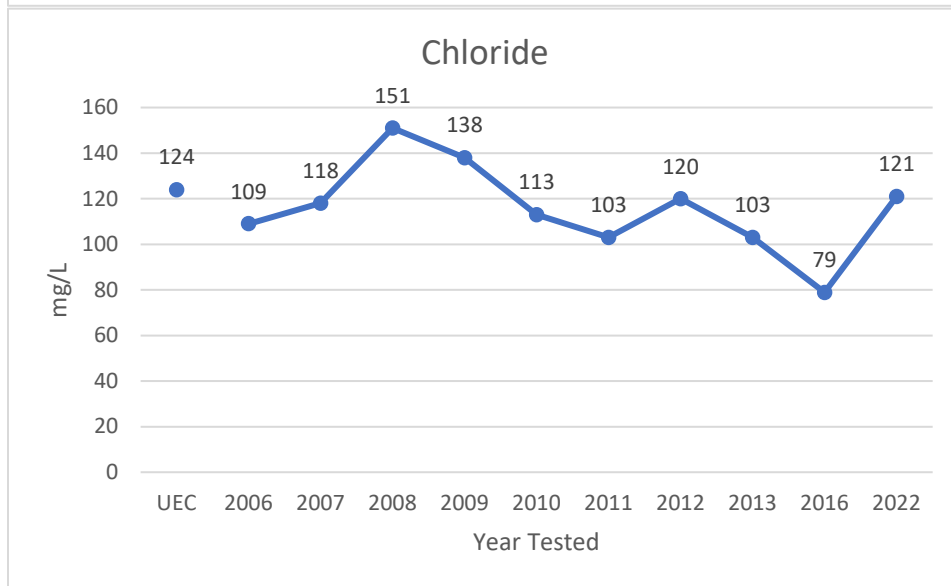
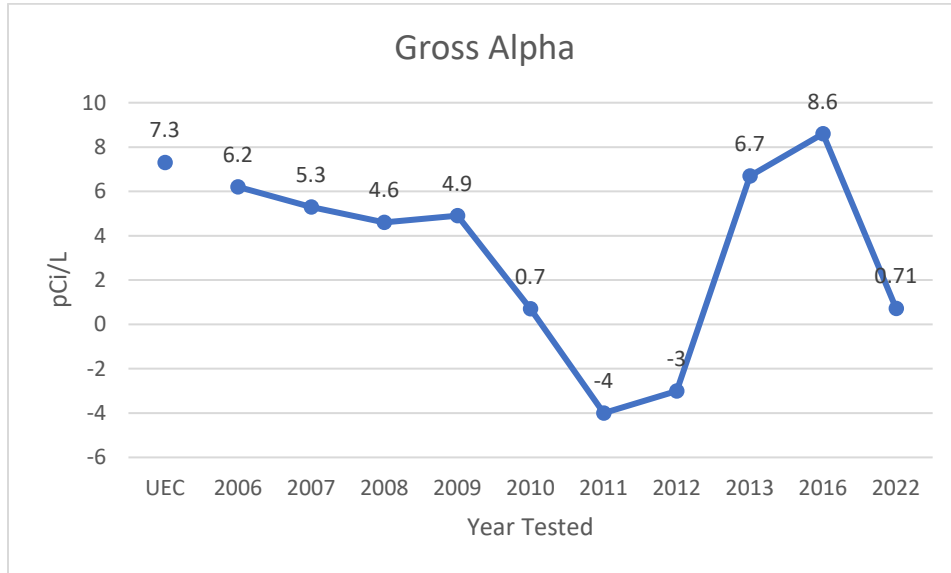




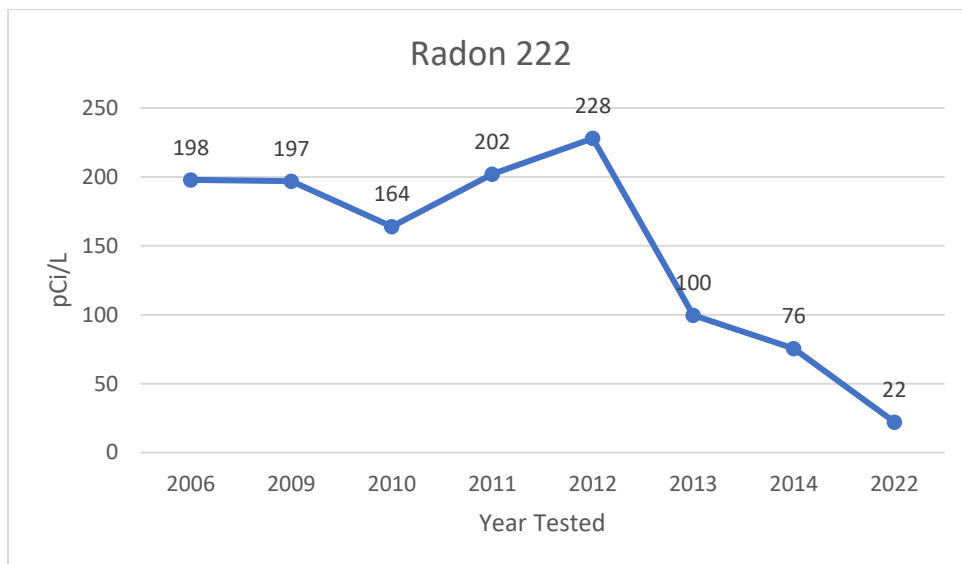
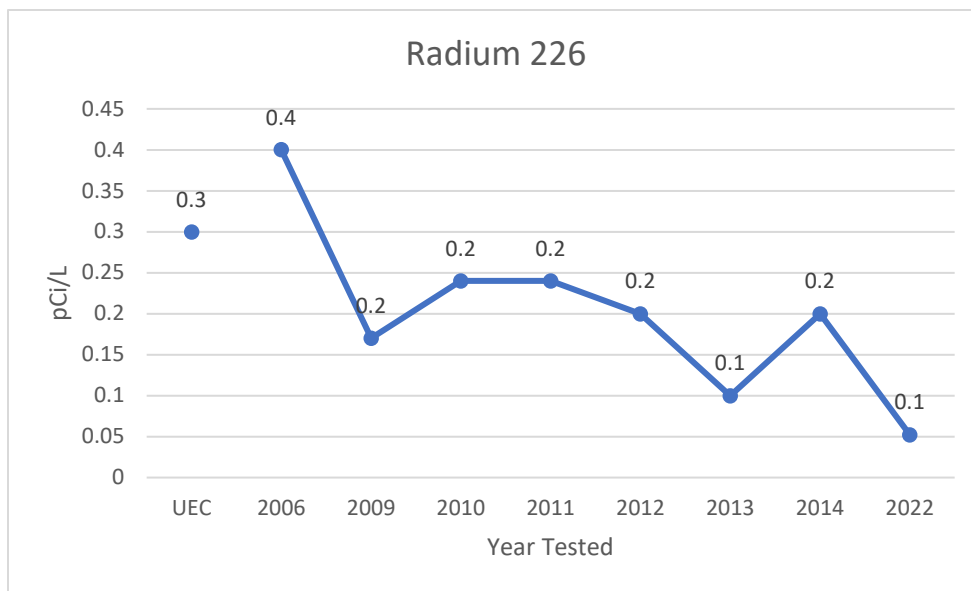
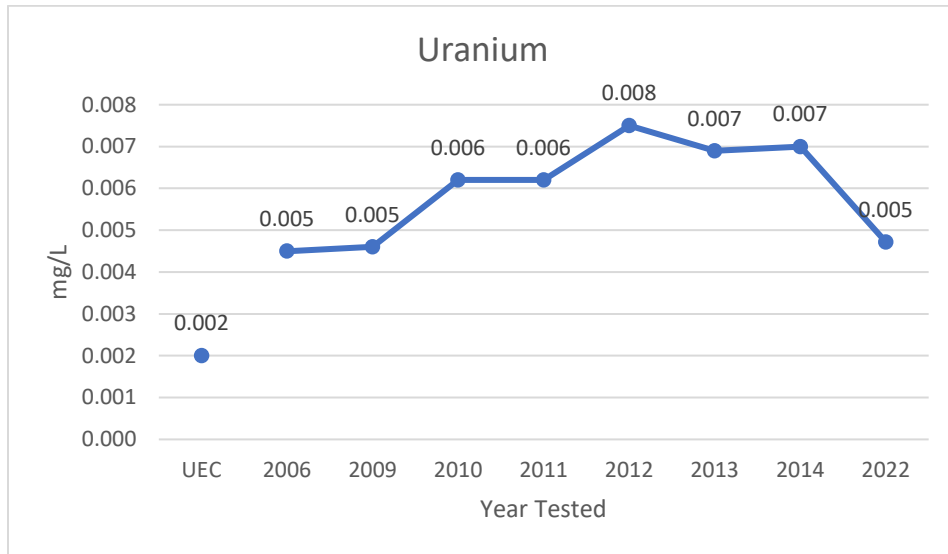
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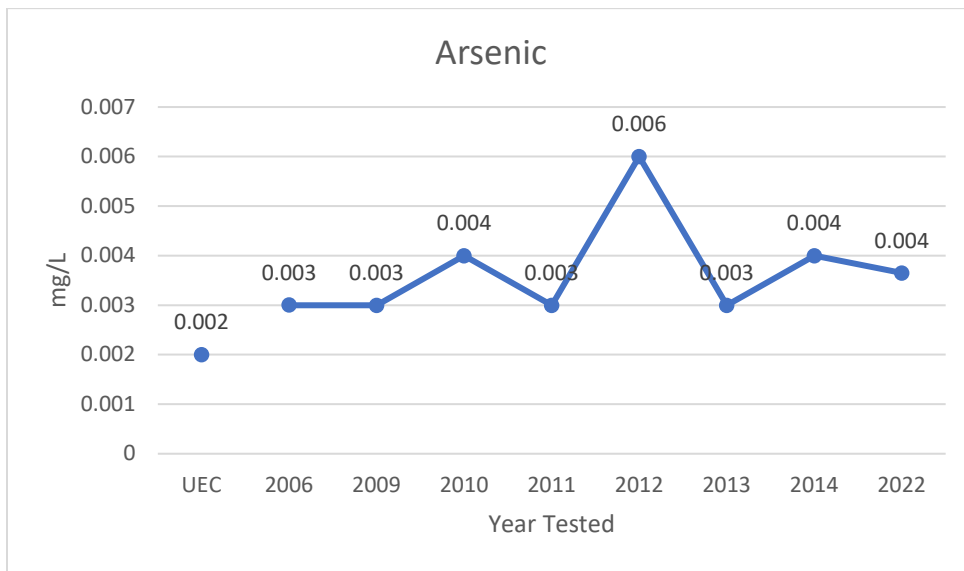
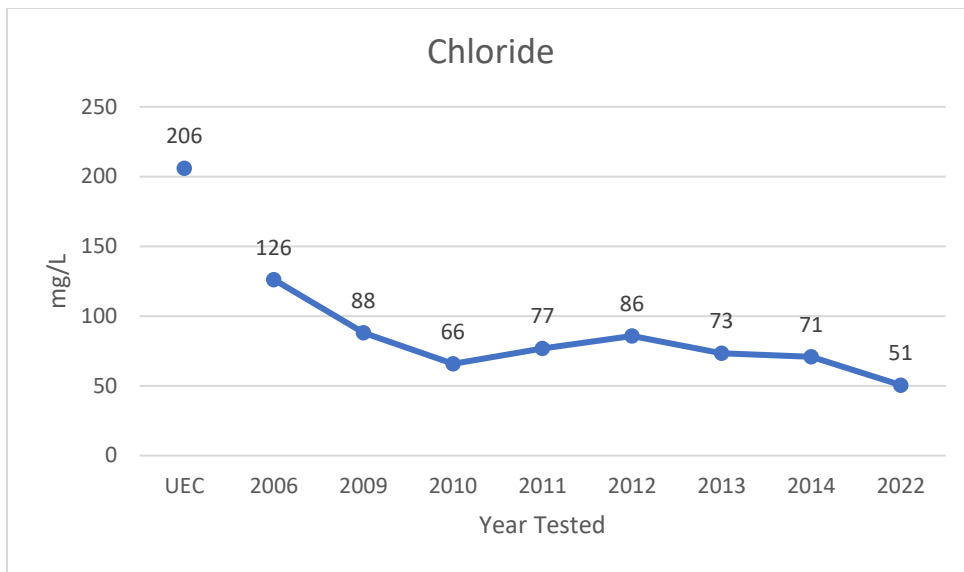
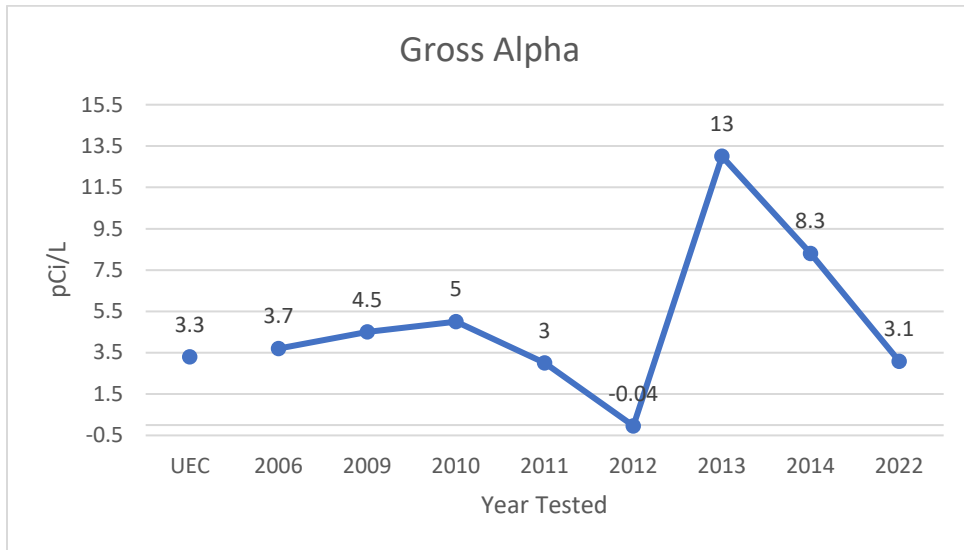
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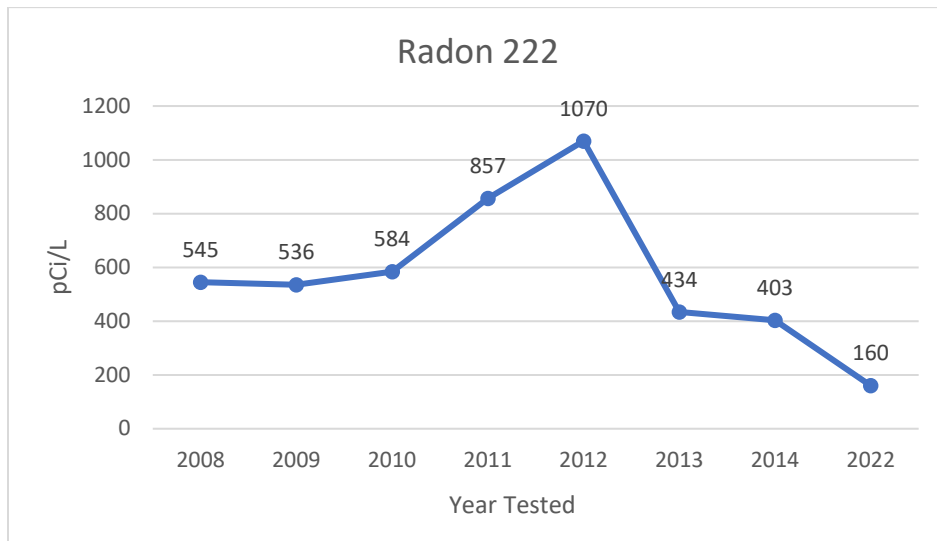
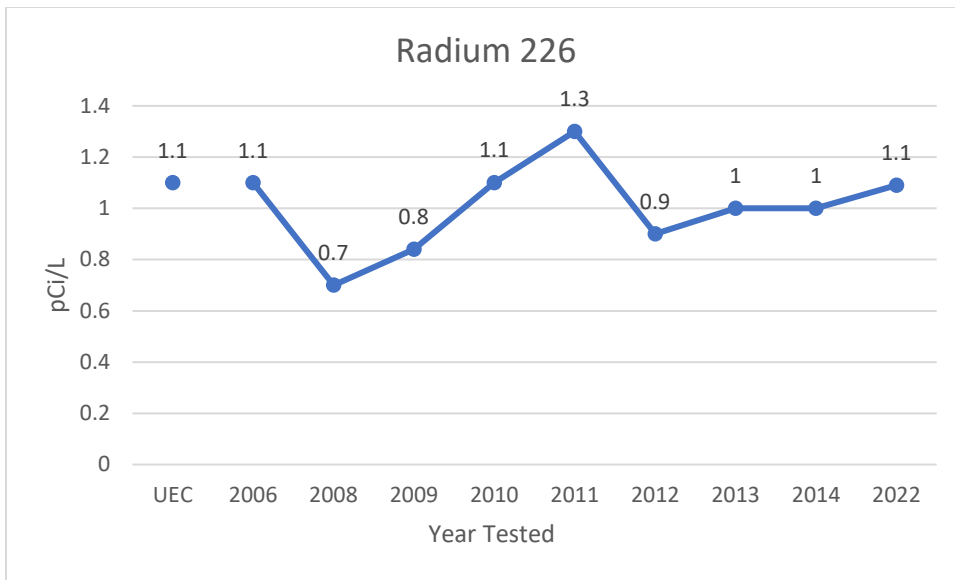
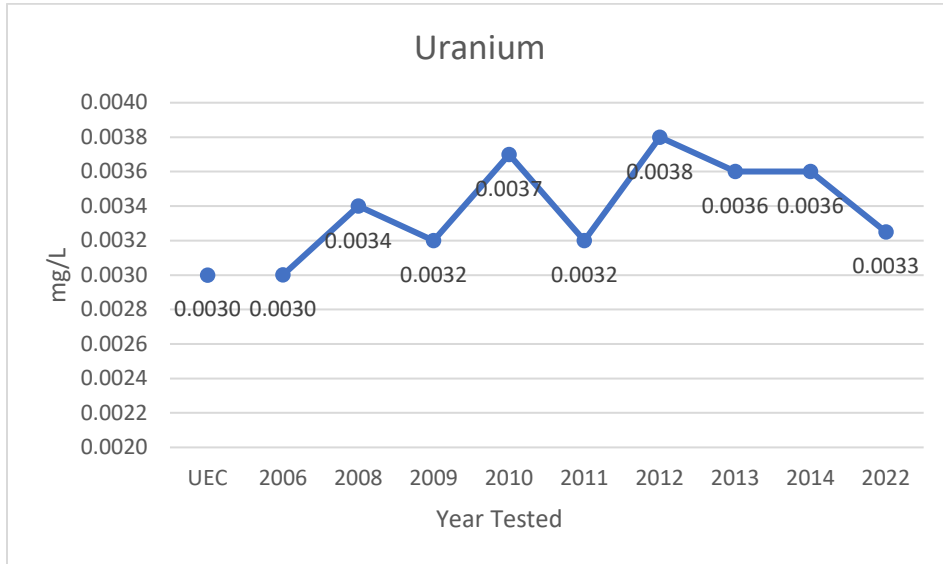


Duderstadt



Duderstadt





Long

