



November 16, 2022

Texas Commission on Environmental Quality
Office of the Chief Clerk
ATTN: Agenda Docket Clerk
Mail Code 105
P.O. Box 13087
Austin, TX 78711-3087

RE: Docket No. 2022-1553-WDW
Request(s) filed on Permit Nos. WDW423 and WDW424

Commissioners,

Thank you for the opportunity to provide comment regarding the request for hearing and reconsideration of renewal permits WDW-423 and WDW-424. Uranium Energy Corp respectfully asks that the request for hearing and request for reconsideration be denied for the following reasons.

- 1) The original permit(s) issued May 25, 2010, were not contested and the well locations, injection zones and injection intervals were not changed in the renewal application(s). If the location, injection zone and injection interval has not changed from the original uncontested application(s), this renewal application(s) should consequently move forward as did the original application(s). In support of the Goliad County Groundwater Conservation District's (GCGCD) goal to protect Underground Sources of Drinking Water (USDW), these renewal application(s) also make minor amendments that provide greater USDW protection than the original application(s). Specifically, the maximum allowable surface injection pressure has been reduced from 976 psig to 761 psig when the injected waste stream specific gravity is 0.997 to 1.005 and the maximum allowable surface injection pressure has been reduced from 914 psig to 698 psig when the injected waste stream specific gravity is 1.005 to 1.05. Lowering the injection pressure, while constructing the well(s) with the same level of integrity as originally designed, will provide an increased safety factor and provide additional protection for USDWs.
- 2) TCEQ technical staff completed a thorough review of all the faults within the area of review and found that the "faults are not sufficiently transmissive or vertically extensive to allow migration of injection fluids out of the proposed injection zone". This is the overwhelming concern of the GCGCD, as it should be, but no



substantive evidence has been provided to suggest that TCEQ staff's review and interpretation of the technical data provided in the application(s) is wrong. It should also be noted that geophysical logs provided in the application(s) indicate a confining zone between 350-450 thick exists to prevent movement of fluids into any USDW. This confining zone is clearly identified in the application and indisputable.

- 3) TCEQ staff notes that sufficient technical resources were provided in the application(s) to properly describe localized faulting. This was the case in the original application(s) and is also the case with the renewal application(s). As such, the staff concluded that the Class I well(s), constructed as approved and completed in the approved injection zone and interval will adequately protect USDWs. To further address the concerns of the GCGCD, it is important to note that the Class I well completions will also have three layers of protection to ensure USDWs are not compromised. The first layer is the surface casing which is steel casing cemented all the way from approximately 1850' to surface. The second layer is the long string steel casing cemented all the way from approximately 3,650' to surface. The third layer is the injection tubing which is steel pipe set to approximately 3,200' and is surrounded by annulus fluid exceeding the injection pressure. Each well is also tested annually by a third party to ensure they can be operated with integrity and each well is monitored continuously once in operation.
- 4) Another concern brought up by the GCGCD was the lack of water well monitoring required by the Class I permit(s). To address this concern, UEC will be required to collect eleven (11) groundwater samples from potable, livestock and irrigation water supply wells within the license area on a quarterly basis per license condition 63.A. These eleven (11) wells will be the closest water wells to the class I well(s) and will provide the quickest detection of vertical fluid movement.
- 5) It appears that only members of the Goliad County Groundwater Conservation District have requested a hearing and/or reconsideration. None of the requests from the GCGCD list a name and physical address that would have standing to request a hearing in their own right nor have any of the requesters demonstrated that they have a personal justiciable interest by providing their location and distance between their personal location and the proposed facility. All addresses listed by the requester(s) are the address for the GCGCD office which is approximately 14.7 miles from the project.



UEC believes that the TCEQ staff has thoroughly reviewed the Class I renewal application(s), has adequately responded to the requester(s) concerns and the application(s) documents fully demonstrated the disposal well(s) ability to operate safely and be protective of the groundwater resources.

Sincerely,

A handwritten signature in blue ink that reads 'R. Craig Wall'. The signature is written in a cursive style.

R. Craig Wall
V.P. EH&S