Brooke T. Paup, *Chairwoman*Bobby Janecka, *Commissioner*Catarina R. Gonzales, *Commissioner*Kelly Keel, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 28, 2025

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

RE: Application by Uranium Energy Corp., Permit UR03075; Docket No. 2025-0700-UIC

Dear Ms. Gharis:

Enclosed for filing with the Texas Commission on Environmental Quality (Commission) is the Executive Director's Response to Hearing Requests and Requests for Reconsideration.

Please do not hesitate to contact me at <u>don.redmond@tceq.texas.gov</u> or (512) 239-0612 if you have any questions. Thank you for your attention to this matter.

Respectfully submitted,

Jon Redmond

Don Redmond, Staff Attorney Environmental Law Division

Division Enclosure

cc: Mailing List

TCEO DOCKET NO. 2025-0700-UIC

APPLICATION BY	§	BEFORE THE TEXAS COMMISSION
URANIUM ENERGY CORP.	§	ON
FOR PERMIT UR03075	§	ENVIRONMENTAL QUALITY

EXECUTIVE DIRECTOR'S RESPONSE TO HEARING REQUESTS AND REQUESTS FOR RECONSIDERATION

I. Introduction

The Executive Director of the Texas Commission on Environmental Quality (TCEQ or Commission) files this Response to Hearing Requests and Requests for Reconsideration (Response) on the application by Uranium Energy Corp. (Applicant) for a renewal and amendment of Class III injection well Permit UR03075. The Office of the Chief Clerk (OCC) received hearing requests from the Goliad County Groundwater Conservation District (GCGCD), David Michaelsen and Linda Pinsker, Debra Chapman, Gregory Chapman, Jesse Ortega, William Christopher, Kenneth Klanika, and Carrizo/Comecrudo Nation of Texas, Inc. Requests for Reconsideration were submitted by GCGCD, David Michaelsen and Linda Pinsker, Debra Chapman, Sarah Maslen and Chancelor Havlik, Debra Primrose, Kenneth Klanika, and Carrizo/Comecrudo Nation of Texas, Inc.

The Executive Director recommends that the Commission find that GCGCD, David Michaelsen and Linda Pinsker, Debra Chapman, Gregory Chapman and Jesse Ortega are affected persons and grant their hearing requests. Based on the information submitted in the requests of Kenneth Klanika, William Christopher and Carrizo/Comecrudo Nation of Texas, Inc., the Executive Director recommends that the Commission find that they are not affected persons and deny their hearing requests. The Executive Director recommends that the requests for reconsideration be denied.

Attached for the Commission's consideration is a Geographic Information Systems (GIS) map of the proposed facility within the jurisdictional boundary of the GCGCD in Goliad County and location of individual hearing requestors. The Draft Permit, Technical Summary, Executive Director's Preliminary Decision, and Executive Director's Response to Public Comment can be found in the Agenda backup materials filed for the Commission's consideration.

II. Description of the Facility

UEC has applied to the TCEQ for renewal and amendment of Class III underground injection control area permit No. UR03075 to authorize an *in situ* uranium mining operation in Goliad County. The Goliad Project is located at 14689 No. US Highway 183, approximately 13.5 miles north of the city of Goliad. TCEQ originally issued permit No. UR03075 to UEC on April 29, 2011. The Commission approved the issuance of permit No. UR03075 after considering an administrative law judge's (ALJ) proposal for decision, evidence, and arguments conducted in a contested case hearing on the application for the Class III injection well permit, UEC's application for Production Area Authorization No. 1 (UR03075PAA1), and UEC's application to designate an exempted aquifer. TCEQ Docket Nos. 2008-1888-UIC and 2009-1319-

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UIC. UEC has installed some monitoring wells but has not yet conducted mining operations under the permit.

UEC proposes to mine uranium deposits in the sands of the Goliad Formation at elevations ranging from 197 feet above mean sea level to 155 feet below mean sea level using the in situ leach recovery method within a 994.9 acre permit area. In situ mining is accomplished by use of Class III underground injection control wells operating for both the injection and production of fluids. Class III wells inject fluid (lixiviant) from the surface into underground deposits of uranium ore. The lixiviant oxidizes the uranium and makes it mobile in the groundwater. The permitted injection may occur only in the production zones of the Goliad Formation that have been designated as an exempted aguifer by the Commission and approved by the United States Environmental Protection Agency. Class III wells functioning in a production mode lift the solution bearing the uranium to the surface where resin beads remove the uranium from the solution. The uranium-loaded resin beads are transported offsite and processed at a licensed facility. The Executive Director has prepared a draft permit that would authorize injection wells for mining within the permitted area.

TCEO previously issued and renewed UEC Class I injection well permits for disposal of wastewater associated with the mining operations. The renewal application was also contested in hearing, and the Executive Director understands that there may be general confusion by the different applications and requirements for the Class I (disposal) and Class III (mining) injection well permits. This response only addresses the hearing requests on the application for the Class III permit UR03075.

III. Procedural Background

The TCEQ received this application on December 22, 2020, and declared it administratively complete on April 12, 2021. The Notice of Receipt of Application and Intent to Obtain a Class III Injection Well Area Permit Renewal was published in English on April 29, 2021, in the *Goliad Advance-Guard*.

The TCEO held a public meeting on the application on August 5, 2024, at 7:00 pm at Goliad Memorial Auditorium, 925 South U.S. Highway 183, Goliad, Texas 77963. Notice of the public meeting was issued on June 27, 2024, and published in English on August 1, 2024, in the *Goliad Advance-Guard*.

On August 12, 2024, UEC revised its application to request amendment of the permit range table by including water quality data from all baseline and monitor wells completed in the production zones within the mine area. UEC also requested that total dissolved solids (TDS) be removed from the permit as an excursion control parameter and replaced with alkalinity, while also listing sulfate and uranium as additional control parameters to be used as needed. The Executive Director completed the technical review of the application on October 17, 2024, and prepared a draft permit. The Combined Revised Notice of Application and Intent to Obtain Permit and Notice of Application and Preliminary Decision for Class III Injection Well Area Permit Renewal and Amendment was issued on October 17, 2024, and published in English on

¹ Commission's March 7, 2011 order

November 14, 2024, in the *Goliad Advance-Guard*. The public comment period ended on December 16, 2024.

The Application was declared administratively complete on or after September 1, 2015; therefore, the Application is subject to the procedural requirements adopted pursuant to House Bill 801, 76th Legislature (1999) and Senate Bill 709, 84th Legislature (2015), both implemented by the Commission in its rules in 30 TAC Chapters 39, 50, and 55.

IV. Evaluation of Hearing Requests

House Bill 801 established statutory procedures for public participation in certain environmental permitting proceedings, specifically regarding public notice and public comment, and the Commission's consideration of hearing requests. The Commission implemented HB 801 by adopting procedural rules in 30 TAC Chapters 39, 50, and 55. Senate Bill 709 revised the requirements for submitting public comment and the Commission's consideration of hearing requests. This application was declared administratively complete on April 27, 2020; therefore, it is subject to the procedural requirements adopted pursuant to HB 801 and SB 709.

A. Legal Authority to Respond to Hearing Requests

"The [E]xecutive [D]irector, the public interest counsel, and the applicant may submit written Responses to [hearing] requests . . ." 2

"Responses to hearing requests must specifically address:

- (1) whether the requestor is an affected person;
- (2) which issues raised in the hearing request are disputed;
- (3) whether the dispute involves questions of fact or of law;
- (4) whether the issues were raised during the public comment period;
- (5) whether the hearing request is based on issues raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the Executive Director's Response to Comment;
- (6) whether the issues are relevant and material to the decision on the application; and
- (7) a maximum expected duration for the contested case hearing."³

B. Hearing Request Requirements

For the Commission to consider a hearing request, the Commission must first determine whether the request meets certain requirements.

"A request for a contested case hearing by an affected person must be in writing, . . . filed with the chief clerk within the time provided . . ., [based

³ 30 TAC §55.209(e).

² 30 TAC §55.209(d).

only on the requestor's timely comments, and] may not be based on an issue that was raised solely in a public comment withdrawn by the commenter in writing by filing a withdrawal letter with the chief clerk prior to the filing of the Executive Director's Response to Comment "4

- "A hearing request must substantially comply with the following:
- (1) give the name, address, daytime telephone number, and where possible, fax number of the person who files the request. If the request is made by a group or association, the request must identify one person by name, address, daytime telephone number, and where possible, fax number, who shall be responsible for receiving all official communications and documents for the group;
- (2) identify the person's personal justiciable interest affected by the application, including a brief, but specific, written statement explaining in plain language the requestor's location and distance relative to the proposed facility or activity that is the subject of the application and how and why the requestor believes he or she will be adversely affected by the proposed facility or activity in a manner not common to members of the general public;
- (3) request a contested case hearing;
- (4) . . . list all relevant and material disputed issues of fact that were raised by the requestor during the public comment period and that are the basis of the hearing request. To facilitate the [C]ommission's determination of the number and scope of issues to be referred to hearing, the requestor should, to the extent possible, specify any of the [E]xecutive [D]irector's Responses to the requestor's comments that the requestor disputes, the factual basis of the dispute, and list any disputed issues of law; and
- (5) provide any other information specified in the public notice of application."⁵

C. Requirement that Requestor be an Affected Person

In order to grant a contested case hearing, the Commission must determine that a requestor is an affected person.

(a) "For any application, an affected person is one who has a personal justiciable interest related to a legal right, duty, privilege, power, or economic interest affected by the application. An interest common to members of the general public does not qualify as a personal justiciable interest.

⁵ 30 TAC §55.201(d).

⁴ 30 TAC §55.201(c).

- (b) . . . [G]overnmental entities, including local governments and public agencies, with authority under state law over issues raised by the application may be considered affected persons.
- (c) In determining whether a person is an affected person, all factors shall be considered, including, but not limited to, the following:
 - (1) whether the interest claimed is one protected by the law under which the application will be considered;
 - (2) distance restrictions or other limitations imposed by law on the affected interest;
 - (3) whether a reasonable relationship exists between the interest claimed and the activity regulated;
 - (4) likely impact of the regulated activity on the health and safety of the person, and on the use of property of the person;
 - (5) likely impact of the regulated activity on use of the impacted natural resource by the person; and
 - (6) . . . whether the requestor timely submitted comments on the application that were not withdrawn; and
 - (7) for governmental entities, their statutory authority over or interest in the issues relevant to the application.⁶
- (d) [In making this determination,] the [C]ommission may also consider the following:
 - (1) the merits of the underlying application and supporting documentation in the [C]ommission's administrative record, including whether the application meets the requirements for permit issuance;
 - (2) the analysis and opinions of the [E]xecutive [D]irector; and
 - (3) any other expert reports, affidavits, opinions, or data submitted by the [E]xecutive [D]irector, the applicant, or hearing requestor."⁷

D. Referral to the State Office of Administrative Hearings

"When the [C]ommission grants a request for a contested case hearing, the [C]ommission shall issue an order specifying the number and scope of the issues to be referred to [SOAH] for a hearing." The [C]ommission may not refer an issue to SOAH for a contested case hearing unless the [C]ommission determines that the issue:

⁶ 30 TAC §55.203.

⁷ 30 TAC §55.203.

^{8 30} TAC §50.115(b).

(1) involves a disputed question of fact or a mixed question of law and fact; (2) was raised during the public comment period . . . by an affected person . . .; and (3) is relevant and material to the decision on the application."9

V. Analysis of the Requests

The Executive Director has analyzed the hearing requests to determine whether they comply with Commission rules, whether the requestors qualify as an affected person, what issues may be referred for a contested case hearing, and the appropriate duration of the hearing.

A. Whether the Requestors Complied with 30 TAC §55.201(c) and (d).

Individuals the Executive Director Recommends the Commission Find are Affected Persons

The Executive Director reviewed the factors in 30 TAC §§55.201(c) and (d) and 55.203 for determining if a requestor is an affected person and recommends the Commission find that GCGCD, David Michaelsen and Linda Pinsker, Gregory Chapman, Debra Chapman and Jesse Ortega are affected persons.

Goliad County Groundwater Conservation District (jurisdiction in Goliad County)

GCGCD submitted various correspondence in response to this application. GCGCD's hearing request was in writing, provided the required contact information, and raised an issue that is the basis of the individual hearing requests in the requestors' timely comments. The correspondence submitted by GCGCD indicates that GCGCD is a governmental body created by the legislature to protect and preserve the groundwater of Goliad County. Under 30 TAC §55.203(b), governmental entities, including local governments, with authority under state law over issues raised by the application may be considered affected persons. GCGCD's interest in protecting groundwater quality is protected under the applicable rules for injection well permit applications as considered in 30 TAC §55.203(c)(1). A reasonable relationship exists between GCGCD's interest in protecting the groundwater of Goliad County and the application for a permit for injection well mining of uranium in Goliad County under 30 TAC §55.203(c)(3). GCGCD timely submitted comments on the application that were not withdrawn under 30 TAC §55.203(c)(6). In HB 3651, 77th Leg., 2001, the Legislature created the GCGCD as a groundwater conservation district established under Section 59, Article XVI of the Texas Constitution with a boundary that is coextensive with the boundaries of Goliad County. As a governmental entity, GCGCD is an affected person with statutory authority over issues relevant to the application under 30 TAC §55.203(c)(7). The Executive Director recommends that the commission find that GCGCD is an affected person.

GCGCD raised the following issues in its request: 1, 2, 3, 4, 5, 6, 7, and 8.

David Michaelsen and Linda Pinsker (location 5)

⁹ 30 TAC §50.115(c).

A request for a contested case hearing was submitted by David Michaelsen and Linda Pinsker dated April 17, 2025, raising several relevant and material issues. Based on the location of their property and the issues they raised, the Executive Director has determined that David Michaelsen and Linda Pinsker demonstrated that they have a personal justiciable interest in the application that is not common to members of the general public, and therefore, are affected persons.

David Michaelsen and Linda Pinsker raised the following issues in their hearing request: 1, 4, 5, and 6.

Debra Chapman (location 2)

A request for a contested case hearing by Debra Chapman was received on April 17, 2025, raising several relevant and material issues. Based on the location of her property and the issues she raised, the Executive Director has determined that Debra Chapman demonstrated that she has a personal justiciable interest in the application that is not common to members of the general public, and therefore, is an affected person.

Debra Chapman raised the following issues in her hearing request: 1, 2, 4 and 7.

Gregory Chapman (location 2)

Correspondence with request for contested case hearing was submitted separately by Gregory Chapman. Based on the location of his property and the issue he raised, the Executive Director has determined that Gregory Chapman demonstrated that he has a personal justiciable interest in the application that is not common to members of the general public, and therefore, is an affected person.

Gregory Chapman raised the following issue in his hearing request: 4.

Jesse Ortega (location 6)

A request for a contested case hearing was submitted by Jesse Ortega dated April 28, 2024, raising a relevant and material issue. Based on the location of his property and the issue he raised, the Executive Director has determined that Jesse Ortega demonstrated that he has a personal justiciable interest in the application that is not common to members of the general public, and therefore, is an affected person.

Jesse Ortega raised the following issue in his hearing request: 4.

2. Individuals or associations the Executive Director recommends the Commission find are not affected persons

<u>Carrizo/Comecrudo Nation of Texas, Inc. (location 1 for Jesse Manciaz)</u>

Marisa Perales submitted a request for contested case hearing dated April 18, 2025, on behalf of Carrizo/Comecrudo Nation of Texas, Inc. The request explained that Carrizo/Comecrudo Nation of Texas, Inc. is a non-profit membership organization serving the cultural and traditional needs of its members and descendants of the Carrizo/Comecrudo Nation of Texas and other indigenous or Native American groups. In support of its request for contested case hearing as an association, Carrizo/Comecrudo Nation of Texas, Inc. identified an individual member, Jesse Manciaz. Mr. Manciaz owns property 15 miles from the UEC permit

area and raises concern of groundwater contamination, surface water contamination, and damage to wildlife habitat on his property. However, the Executive Director contends that Mr. Manciaz does not have standing in his own right to support the granting of the associational request of Carrizo/Comecrudo Nation of Texas, Inc. under 30 TAC Section §55.201(b)(2). The 15-mile distance from the permitted area to Mr. Manciaz's property and the unlikelihood of specific impact of the regulated activity on Mr. Manciaz, his property, or his natural resources do not establish a personal justiciable interest or support that he would be an affected person in his own right. The permit does not authorize discharges to surface water or migration of mining fluids out of a production area that could impact property 15 miles away. His described interests in the application are common to the general public. The Executive Director recommends that the request for contested case hearing by Carrizo/Comecrudo Nation of Texas, Inc. be denied.

Carrizo/Comecrudo Nation of Texas, Inc. raised issues 1, 3, 4, 5, and 9.

Kenneth Klanika (location 4)

Kenneth Klanika submitted various correspondence and request for contested case hearing on the application. His letter dated April 18, 2025, claims that his family operates a business and owns property in the vicinity of the permit area. However, the only specific location information provided is a mailing address in Coupland, Texas over 105 miles away. The request fails to explain Mr. Klanika's personal justiciable interest affected by the application and a specific, written statement explaining in plain language the requestor's location and distance relative to the proposed facility or permitted activity. Because Mr. Klanika's hearing request did not comply with 30 TAC §55.201(d) in describing a personal justiciable interest with specific description of the distance of the permitted activity to his property, the Executive Director cannot determine that Kenneth Klanika is an affected person. Accordingly, the Executive Director recommends that Kenneth Klanika's request for contested case hearing be denied.

Kenneth Klanika raised issues 1, 3, 4 and 5.

William Christopher (location 3)

William Christopher submitted a comment on the application on December 29, 2023, that stated: "I wish to ask for a public hearing to protest renewal of the permit. Our property is downslope from the leases." It is possible that this was intended as a request for a public meeting which was subsequently held on this application. If this is a request for a contested case hearing, the Executive Director contends that the request does not comply with the requirements for requesting a contested case hearing. The request does not adequately articulate a personal justiciable interest in the application or describe a personal impact from the permitted facility or activity. The Executive Director recommends that the Commission find that William Christopher is not an affected person and deny the request.

B. Whether the Issues Raised May be Referred to SOAH for a Contested Case Hearing.

The Executive Director has identified issues of disputed questions of fact or mixed questions of law and fact, raised by the requestors during the comment period,

provided in correspondence in support of the request for a contested case hearing, and relevant to the decision on the application that could be referred to SOAH if the Commission determines that the District is an affected person. The issues discussed were raised during the public comment period and addressed in the Executive Director's Response to Public Comment (RTC). None of the issues were withdrawn. All issues identified in this Response are considered disputed, unless otherwise noted.

The Executive Director recommends that the Commission refer the following issues to SOAH for a Contested Case Hearing:

- 1. Whether the application provided adequate characterization of the geology under applicable rules. (RTC No. 2) The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit.
- 2. Whether the application provides adequate information on pre-mining groundwater quality under applicable rules, including water quality data obtained for the original permit application. (RTC No. 5) The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit.
- 3. Whether the application adequately assesses artificial penetrations in the area of review under applicable rules. (RTC No. 6) The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit.
- 4. Whether the proposed operations are adequately protective of groundwater quality under applicable rules. (RTC No. 16) The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit.
- 5. Whether the application provides for adequate monitoring under applicable rules. (RTC No. 10) The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit.
- 6. Whether the application to amend control parameters is adequate under applicable rules. (RTC No. 11) The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit.
- 7. Whether the application is adequately protective of livestock and wildlife. (RTC No. 19) The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit.
- 8. Whether the application is in the public interest. (RTC No. 24) The issue involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit.

- The Executive Director recommends that the Commission refer the following issue to SOAH for a Contested Case Hearing only if the request of Carrizo/Comecrudo Nation of Texas, Inc. is granted:
- 9. Whether the proposed financial assurance for the proposed permit is adequate. (RTC No. 28) This issue was raised only raised by Carrizo/Comecrudo Nation of Texas, Inc. and involves a disputed question of mixed fact and law, was raised during the comment period, was not withdrawn, and is relevant and material to the issuance of the draft permit.
 - The Executive Director recommends that the Commission not refer the following disputed issues to SOAH for a Contested Case Hearing:
- 10. Whether the application for the Class III injection well permit provided different information than the application for the Class I injection well permit. (RTC No. 3) Requirements for Class III and Class I permit applications are separate with analysis of different injection zones. The application for the Class I injection well permit is not relevant and material to the application for the Class III injection well permit.
- 11. Whether the application provided results of hydraulic testing or pump testing to assess transmissivity of faults in the area of review. (RTC No. 7) Because there are no applicable requirements for submitting results of hydraulic testing or pump testing of faults as part of an application for a Class III injection well permit, the issue is not relevant and material to the application. The draft permit requires the submission of results of a hydrologic testing program for any applications of subsequent production area authorizations, not the Class III injection well permit.
- 12. Whether the application adequately established "baseline" groundwater quality. (RTC No. 9) Because there is no requirement for establishing "baseline" in the Class III injection well permit, the issue is not relevant and material to the application.
- 13. Whether the application inappropriately relied on self-reported information. (RTC No. 12) Because there is no requirement against self-reported information in the application, the issue is not relevant and material to the application.
- 14. Whether the proposed operations negatively affect the quantity of groundwater available. (RTC No. 17) The applicable statutes and rules for the application and issuance of a Class III injection well area permit for in situ uranium mining do not regulate the volume of fresh water used by a permittee to conduct mining operations. The issue is not relevant and material to the application.
- 15. Whether the issuance of the proposed permits constitutes a taking of private property. (RTC No. 30) The consideration or issuance of an injection well permit does not convey any property rights of any sort, nor any exclusive privilege, and does not become a vested right in the permittee. A permit does not authorize any injury to persons or property or an invasion of other property rights, or any infringement of state or local law or regulations. Because the commission would not have authority to adjudicate a takings claim in a hearing on an application for a Class III injection well permit, the issue is not relevant and material to the application.

VI. Contested Case Hearing Duration

If there is a contested case hearing on this application, the Executive Director recommends that the duration of the hearing be six months from the preliminary hearing to the presentation of a proposal for decision to the Commission.

VII. Requests for Reconsideration

The TCEQ received Requests for Reconsideration from Debra Primrose; Sarah Maslen and Chancelor Havlik; David Michaelsen and Linda Pinsker Kenneth Klanika; Debra Chapman; GCGCD; and Carrizo/Comecrudo Nation of Texas, Inc. The Executive Director has reviewed the Requests for Reconsideration and maintains that the Draft Permit, if issued, will comply with all applicable statutory and regulatory requirements. The Executive Director recommends that the Requests for Reconsideration be denied.

VIII. Executive Director's Recommendation

The Executive Director recommends the following actions by the Commission:

- 1. The Executive Director recommends the Commission deny the Requests for Reconsideration.
- 2. The Executive Director recommends the Commission find that the Goliad County Groundwater Conservation District; David Michaelsen and Linda Pinsker; Debra Chapman; Gregory Chapman; and Jesse Ortega are affected persons and grant their hearing request.
- 3. If referred to SOAH, that the duration of the hearing be six months from the preliminary hearing to the presentation of the proposal for decision to the Commission.
- 4. If referred to SOAH, concurrently refer the matter to Alternative Dispute Resolution.
- 5. If referred to SOAH, refer Issues 1 through 8 listed above in Part V of this Response.

Respectfully submitted,

Texas Commission on Environmental Quality

Kelly Keel Executive Director

Phillip Ledbetter, Director Office of Legal Services

Charmaine Backens, Deputy Director Environmental Law Division

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n Redmond

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REPRESENTING THE EXECUTIVE DIRECTOR OF THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

CERTIFICATE OF SERVICE

I certify that, on July 28, 2025, the "Executive Director's Response to Hearing Requests and Requests for Reconsideration" on the application by the Uranium Energy Corp. for permits RU03075 was filed with the TCEQ's Office of the Chief Clerk and that a complete copy was served to all persons listed on the attached mailing list via hand delivery, facsimile transmission, inter-agency mail, electronic submittal, or by deposit in the U.S. Mail.

Don Redmond Staff Attorney Environmental Law Division

Ion Redmond

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Phone (512) 239-0612

MAILING LIST URANIUM ENERGY CORP. DOCKET NO. 2025-0700-UIC; PERMIT NO. UR03075

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https://www.tceq.texas.gov/goto/efilings

REQUESTERS:

Via First Class Mail or Electronic Mail

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CHANCELOR HAVLIK & SARAH MASLEN 3265 DANFORTH RD GOLIAD TX 77963-3537

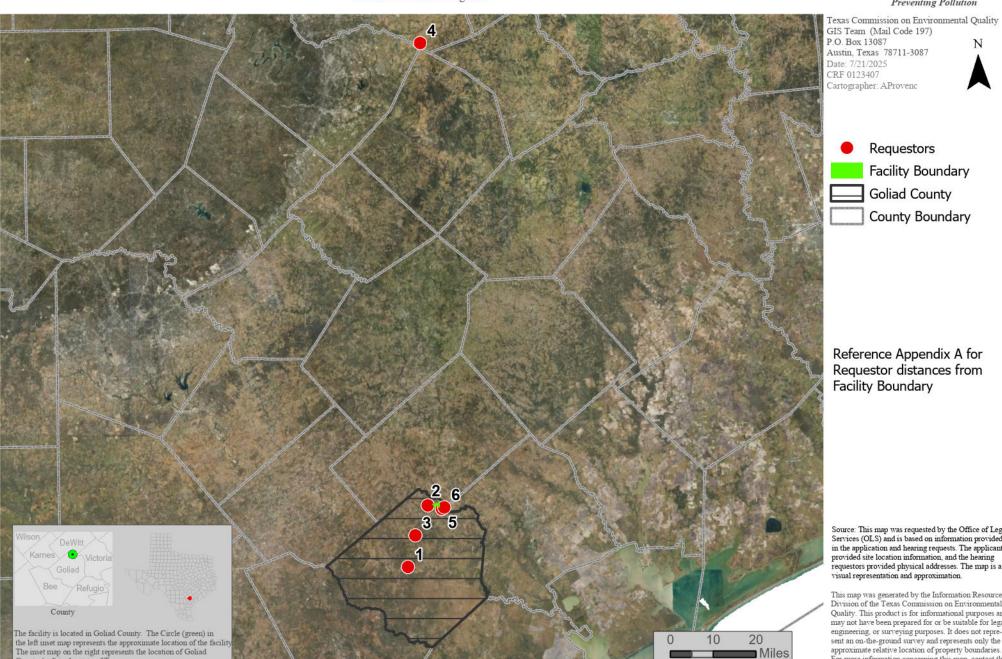
DEBRA PRIMROSE 500 ATZENHOFFER RD YORKTOWN TX 78164-5414

Attachment A – Geographic Information Systems (GIS) Map of Facility in Goliad County

Uranium Energy Corp. Permit No. UR03075

Map Requested by TCEQ Office of Legal Services for Commissioners' Agenda

Protecting Texas by Reducing and Preventing Pollution



County (red) in the state of Texas

Reference Appendix A for Requestor distances from

Source: This map was requested by the Office of Legal Services (OLS) and is based on information provided in the application and hearing requests. The applicant provided site location information, and the hearing requestors provided physical addresses. The map is a visual representation and approximation.

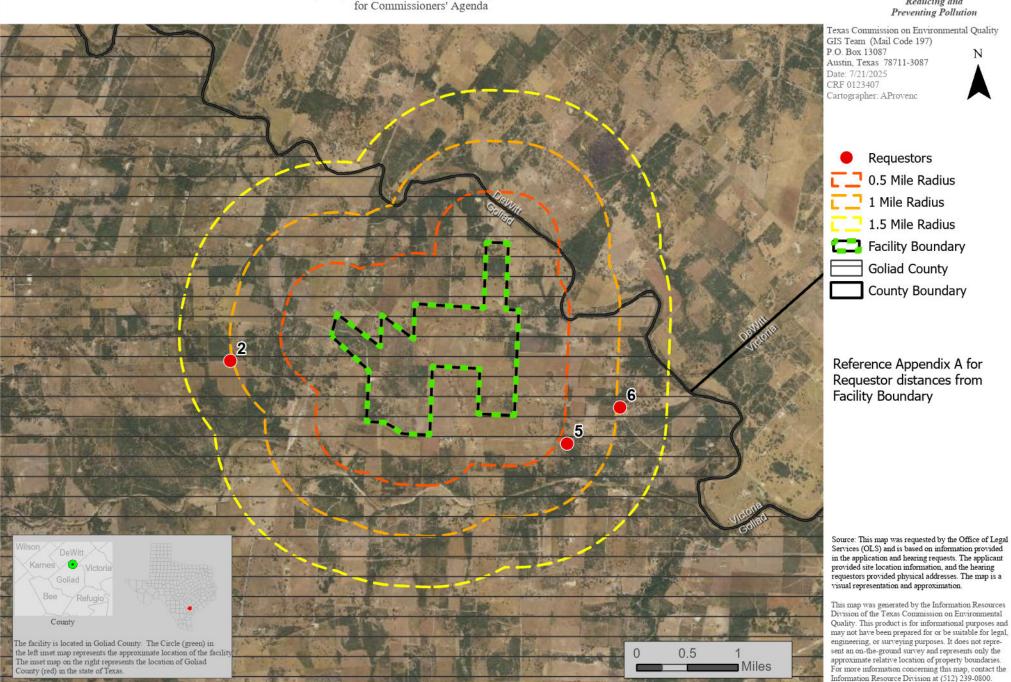
This map was generated by the Information Resources Division of the Texas Commission on Environmental Quality. This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not repre-sent an on-the-ground survey and represents only the approximate relative location of property boundaries. For more information concerning this map, contact the Information Resource Division at (512) 239-0800.

Uranium Energy Corp. Permit No. UR03075



Map Requested by TCEQ Office of Legal Services for Commissioners' Agenda

Protecting Texas by Reducing and Preventing Pollution



Appendix A for Uranium Energy Corp. Permit No. UR03075

ID	Name	Address	City	State	ZIP	Lat	Long	Distance from Facility Boundary (Miles)
1	Carrizo/Comecrudo Nation of Texas Inc. (Jesse Manciaz)	449 FM 2043	Goliad	TX	77963	28.66321	-97.4624	15.00
2	Chapman, Gregory and Debera	792 FM 1961	Yorktown	TX	78164	28.870124	-97.380635	1.02
3	Christopher, William	5300 Old Goliad Road	Goliad	TX	77963	28.769539	-97.431008	7.67
4	Klanika, Kenneth	2078 County Road 460	Coupland	TX	78615	30.43629	-97.367784	106.78
5	Michaelsen, David and Pinsker, Linda	1005 Fox Road	Goliad	TX	77963	28.85712	-97.326102	0.59
6	Ortega, Jesse	1938 Fox Road	Goliad	TX	77963	28.86212	-97.317335	1.04

Requestor 7: Goliad County Groundwater Conservation District

- Does not have a specific location on the map but instead has jurisdiction over the whole of Goliad County. Goliad County boundary is reflected in map legend.