An Additional Review by M. D. Campbell and Associates, L.P. (http://www.mdcampbell.com)

Key to Comments: Black = Original Article Content <mark>Yellow</mark> = Particular Offending words or phrases Red = C&A Mining Group Comments

Article in Question:

Water Group: 'We want action'

Surface water testing requested near uranium exploration site

October 16, 2007 BY Sonny Long - VICTORIA ADVOCATE

GOLIAD - Concern is growing about the quality of surface water near a controversial uranium exploration area in northern Goliad County.

[Whose concern is growing? Is the concern coming from the landowners, the district board, or someone else? Who said exploration area is "controversial"? This assumes information that has not been presented to the reader yet.]

On Monday, the county's groundwater conservation district board of directors voted to ask the Guadalupe-Blanco River Authority to test the surface water near where Uranium Energy Corporation has been conducting exploration since May 2006. Springs in the area are in the Guadalupe-Blanco watershed.

The district has been sampling water wells in the area since last December, helping to establish a groundwater quality baseline, but surface water sampling has not been done. Directors expressed concern that even if the sampling is done now, it is almost 18 months after hundreds of boreholes have been drilled in the area.

[1. What prompted the district board to ask the River Authority to test the water? Who brought the surface water concerns to the notice of the District in the first place? How "near" are the surface waters to the exploratory wells? The lack of detail here simply raises concerns that appear to be unfounded. No reason for such action has been introduced. Testing of surface water within 0.5 miles of a proposed uranium mine is part of the baseline study for the mine that is required by the State of Texas, so why the duplication of effort?

2). How can the springs become contaminated as a result of the drilling when they are a near-surface phenomenon? The exploratory wells are much deeper, in the area of 300 to 500 feet below the surface.

3) If there is a real concern, why wait on the GRBA to sample? It must not be that critical if the district has held off doing their own sampling for 18 months. If they truly believe that an impact is possible, aren't they themselves needlessly endangering landowners and their property (livestock) by failing to sample surface waters themselves? It states that they have been sampling wells but that "surface water sampling has not been done". Why has it not been done if it is truly a "growing concern"?.]

The district contacted GBRA earlier in the year about sampling the surface water, but was told it would be the 2007-08 budget year before any sampling could be done, explained groundwater district president Art Dohmann.

"The GBRA has been sampling Coleto Creek Reservoir, but never collected samples upstream of that. These springs feed Coleto Creek Reservoir. We want action," Dohmann said.

Also Monday, a letter from [the mining company] was also presented to the board, showing a well usage report for September for a rig supply well on the Jacobs property. The uranium company used 165,510 gallons of water during the month. The only problem, Dohmann said, is that the district did not permit the well for operation.

[1. Where are these springs in relation to the drilling? Are they upgradient? Since there is no indication in the article where the springs exist in relation to the drilling, people reading the article must assume that there may be a direct connection between the drilling and the springs. What evidence do they have to support this connection?

2. Why the strident tone coming from Dohman? The district is perfectly capable of taking care of this issue themselves. The strident tone makes it sound as though the people of Goliad are being persecuted by the GBRA, when the GBRA has already explained why they cannot sample at this time. The apparent rabble-rousing by Dohman has no basis in fact until sampling has been conducted by independent professionals.]

The district issued a drilling permit for the new well after the original well the company wanted to use for rig water tested high for Radium 226. The new well was sampled and the results came back OK in May, but an operating permit was never issued.

[1. How could the mining company be unaware that an operating permit was necessary? Were they being set up by the District? "Sure we'll let them drill the well and when they start producing water, we'll cite them for a violation". If so, this ordinance is not mentioned. Why not? If there was some misdeed conducted by the mining company, wouldn't the District shut the well down or issue a fine? The District made no mention of either of these. The reader is not informed about what is going to happen as a result of this unpermitted activity.

2) Where are the results? Who took the samples? What laboratory was used for these analyses?].

There was also some discussion Monday about what effects full-scale uranium mining would have on the availability of water near the mining operation.

[1. Without a knowledgeable ground-water professional present, these discussions have no scientific basis in reality. Based on the article, the reporter implies that the discussions only serve to give the District (Dohman) an opportunity to incite people against the mining project. Also, what conclusions were reached as a result of the discussion? Did the discussion conclude that impact was inevitable or that no impact was possible? The statement, taken by itself and given the tone of the rest of the article, leads the reader to the belief that whatever effects there are, they have to be bad. This represents another not-so-subtle bias being expressed by the author of the article (the reporter)]

During the public comments portion of the meeting, Mary Anklam, who lives near the uranium exploration site, asked, "What if our wells run dry?"

[Out of all the public comments likely made at the meeting, why was this one chosen? Because it promotes the greatest public fear? If you do the math you find that the mining company is producing water from the well in question at a rate of less than 4 gallons per minute. This is not a terribly high rate of production, especially when you consider that municipal wells produce hundreds of gallons per minute. Based on historical information for the aquifer in use, there is little to no reason to expect this well to cause other wells in the area to run dry. Also, once the mine is in production, only 1% of the water in use is disposed of. The remainder is recirculated through the mine.]

That issue would be put on the agenda for the district's next meeting.

[This comment represents a "hook" on the readers to continue to be concerned until more news is available. Remember the days when the TV announcer would say "Come back next week to see the thrilling conclusion to this episode"? It leaves the reader with a sense of apprehension, as if a coffin is going to be opened right there at the next meeting. Is this balanced reporting? We don't think so.

Fortunately, these issues, as well as others involving uranium exploration and nuclear power development in general, are now being discussed in the light of reason without fear (see: http://www.assuranceonline.us/articles.html), and especially a recent review of Goliad issues by the industry-sponsored group, *Assurance OnLine* (here). Although prepared by the uranium company, we have reviewed the latter and have determined that the Goliad review has merit and is well founded.]

Sonny Long is a reporter for the *Victoria Advocate*.

Original Article: http://www.victoriaadvocate.com/847/story/137670.html#