



**Virginia
Groundwater**

Science-based Well Drilling

*Virginia Groundwater LLC
Nick H. Evans PhD CPG
4609 Burnley Station Road
Barboursville, Virginia 22923*

November 28, 2008

The Honorable R. Lee Ware, Jr.
PO Box 689
Powhatan, VA 23139

RE: Potential Uranium Mining Study

Dear Delegate Ware:

I am writing to you on behalf of the Piedmont Environmental Council who asked for my opinion regarding the Virginia Coal and Energy Commission's request for a "wide-ranging study of the impact of uranium mining in the Commonwealth" to include "economic, environmental, public health and social issues affecting the nearby communities, the region and the Commonwealth as a whole".

As a Professional Geologist, Virginia landowner, and long-time advocate for informed public policy on natural resource stewardship, I offer for your consideration the following points:

1. Any study that purports to model likely impacts of uranium mining and processing should be based on empirical data rather than theory. Any such study must address the likely impacts of uranium mining not only at the currently proposed mining site in Pittsylvania County, but also at other plausible potential mining sites in similar geologic settings elsewhere in the Commonwealth.
2. Such a study should begin by establishing baseline data on existing conditions at potential Virginia mining sites, to include data pertaining to geology, hydrology, geomorphology, soils, climate, population density and land use.
3. (Only) after existing baseline conditions have been thoroughly documented for the Pittsylvania site and for other geologically similar sites in Virginia, the study should seek out and assemble data on the performance and impacts of existing uranium mining operations elsewhere in the world, where conditions are similar to those documented in the baseline site characterizations in Virginia.

The degree to which comparisons with existing mining operations elsewhere, are valid predictors for likely impacts from uranium mining in Virginia, depends first on the quality and thoroughness of the Virginia baseline characterizations (item 2), and secondly on

the extent to which the existing mining sites can be located elsewhere that represent valid analog sites to Virginia (item 3). It is unlikely that a perfect analog for the proposed Virginia mining sites exists somewhere else in the world. Inevitably this is going to be a comparison of "apples to oranges" to some extent. This makes it all the more imperative that the multivariate analysis be based on sound data both in Virginia and at analog sites elsewhere.

What I've outlined above represents a considerable amount of work; I know of no shortcuts that will ultimately best serve the interests of the Commonwealth. This study is not something to be trivialized for the sake of expediency, the stakes are too high.

Please contact me if you have questions or if I can be of assistance to your committee in any way.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick H. Evans", written over the word "Sincerely".

Nick H. Evans, PhD

President, Virginia Groundwater LLC

Chairman, Thomas Jefferson Soil & Water Conservation District

cc: Coal and Energy Commission Uranium Subcommittee