



## RAILROAD COMMISSION OF TEXAS

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CHRISTI CRADDICK  
CHAIRMAN

April 6, 2015

The Honorable Gina McCarthy  
Administrator  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

Dear Administrator McCarthy:

On behalf of the Railroad Commission of Texas (Commission), we are writing to urge the Environmental Protection Agency (EPA) to withdraw its proposed rule related to the health and environmental protection standards for uranium and thorium mill tailings (EPA-HQ-OAR-2012-0788).

As you should know, the Commission has regulated Texas uranium exploration projects since 1975, and we are not aware of a single example of groundwater contamination from *in situ* uranium recovery operations. We are surprised the EPA did not contact the Commission or the Texas Commission on Environmental Quality (primary regulator of ISR mining projects in Texas) before initiating this proposed rulemaking. It is our understanding EPA also failed to consult with the industry and ignored its own Science Advisory Board's recommendation to consider the extensive data sets that are already available to inform the rulemaking process.

EPA's proposal for an additional 30 years of post-restoration groundwater stability monitoring is arbitrary, not based on science, and would have a devastating effect on the land and mineral interest owners, as well the uranium industry and their workforce in Texas.

We urge the EPA to withdraw the rule and instead work with state regulators and the uranium industry to identify and review the existing data sets before determining if any additional requirements are necessary.

Sincerely,

A handwritten signature in black ink that reads "Christi Craddick". The signature is written in a cursive style with a large, prominent initial "C".

Christi Craddick  
Chairman, Texas Railroad Commission