SOAH DOCKET NO. 582-23-15496
TCEQ DOCKET NO. 2022-1553-WDW

APPLICATION BY URANIUM ENERGY CORP. FOR RENEWAL AND AMENDMENT OF PERMITS WDW423 & WDW424	**§** **§** **§** **§**	**BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS**

EXECUTIVE DIRECTOR'S EXCEPTIONS TO THE PROPOSAL FOR DECISION

TO THE COMMISSIONERS OF THE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY:

The Executive Director of the Texas Commission on Environmental Quality (the Commission or TCEQ) files her Exceptions to the Proposal for Decision on the application by Uranium Energy Corp. (UEC or Applicant) for renewal and amendment of Class I injection well permits WDW423 and WDW424. The Executive Director respectfully disagrees with the recommendation presented in the proposal for decision (PFD) to remand the application to the Executive Director for further consideration. The PFD improperly broadens the scope of the referred contested case hearing; misapplies the application requirements in commission rule for providing geoscientific information; mischaracterizes the position of the Executive Director; and prematurely imposes monitoring or corrective action requirements before the subject injection wells are drilled, constructed and tested.

The Executive Director incorporates her Closing Arguments and Response to Closing Arguments on the referred issues. The Executive Director contends that the weight of the evidence in the record supports findings and conclusions that UEC has met its burden of proof on all issues and that the final draft permits be granted. Alternatively, if the Commission determines that additional information is needed to make a decision on the application, the Executive Director supports the reopening of the record for further proceedings as described in 30 TAC §80.265. The Executive Director provides exceptions to the PFD on specific issues as follows.

I. The PFD improperly expands the scope of the hearing

The Commission referred to the State Office of Administrative Hearings (SOAH) three disputed issues raised by the Goliad County Groundwater Conservation District (District) that are mixed questions of fact or law that are relevant and material to the decision on the application. These disputed issues are: A) whether the permit

application adequately characterizes the geology and identified and assessed faults in the vicinity of the proposed injection wells; B) whether the draft permit provides for adequate monitoring of migration of injected fluids in the vicinity of the proposed injection wells; and C) whether the location and design of the injection well and pre-injection facilities are adequate. These issues were identified based on the public comments submitted by the District, the only commenter on the application. The Commission did not refer to SOAH an issue on the adequacy of the calculation of the cone of influence (COI) nor on the adequacy of the review of artificial penetrations in the area of review. Modeling the COI in the injection reservoir does not address whether characterization of the geology is adequate under issue A.[1] Assessing artificial penetrations in the area of review and prescribing any corrective action for improperly plugged wells does not address whether the location of the proposed injection well is adequate.[2]

Commission rule at 30 TAC §80.6 states, "when a case is referred to SOAH, only those issues referred by the commission or added by the judge under §80.4(c)[(15)]…may be considered in the hearing. The judge shall provide findings of fact and conclusions of law only on those issues." The ALJs did not issue any ruling or order in this proceeding to expand the scope of the hearing to consider additional issues beyond the list referred by the Commission under §80.4(c)(15). Despite the restriction to limit the case to the referred issues, the proposal for decision devotes significant attention

[1] As defined in 30 TAC §331.2(31), the "cone of influence," or COI, is the potentiometric surface area around the injection well within which increased injection zone pressures caused by the injection of wastes would be sufficient to drive fluids into an underground source of drinking water. Under §331.42(b), the COI is a predictive calculation of pressure increase, commonly based on the modified Theis equation, using reservoir properties and injection parameters as inputs. The COI does not characterize geology.

[2] In responding to the Executive Director's post-hearing arguments that the referred issued for hearing did not include the condition of other wells in the area the area of review, the PFD at pages 85-6, asserts that the condition of other wells is relevant to the issue of whether the location of the proposed injection well is adequate. The Executive Director contends that considering the adequacy of the siting of the location of a proposed injection wells is separate and distinguishable from the review of the condition of artificial penetrations in the area. They are considered in separate subdivisions of 30 TAC §331.121. The consideration of the location of the injection well ceases after the permit is approved. The consideration of the condition of wells in the area of review continues while the injection well is operated. Subsequent discovery of an improperly plugged well in the area of review triggers corrective action to address the suspect well; subsequent discovery of an improperly plugged well does not establish that the approved injection well is no longer suitably located.

to the calculation of the COI and the condition of artificial penetrations in the area of review and associated corrective action.

The unexpected expansion of the scope of the hearing presents a moving target for marshalling a case at hearing. It unfairly affects the Executive Director's participation in the hearing to complete the administrative record and support the Executive Director's position. The Executive Director assigns both a professional geoscientist and professional engineer to the review of a Class I injection well permit application. If the Executive Director had known that the scope of the hearing included the concepts of reservoir modeling and plugging history of wells in the area of review and associated corrective action, the Executive Director would have offered the testimony of a professional engineer on those matters. When the Executive Director pointed out in post-hearing argument that the scope of the hearing did not include consideration of wells in the area of review, the ALJs responded that the Executive Director did not make a timely evidentiary objection.[3] This rationale improperly expands the scope of the hearing on the issues based on any admitted evidence rather than following the requirements of §80.6 and §80.4(c)(15) for limiting the scope of the hearing.

II. The PFD misapplies requirements on characterization of local geology

The PFD misapplies the requirements in Commission rule for submitting geoscientific information in a Class I injection well permit application. The PFD asserts that UEC did not meet its burden of proof for adequately characterizing local geology, contending that UEC impermissibly relied on estimates and predictions of local geology. The PFD declares that Commission rules do not state that an applicant is allowed to make "extrapolations" or geologic interpretations of local geology.[4] This position reflects a misunderstanding of both the Commission's rules and the professional practice of geoscience. Commission rule at 30 TAC §331.21 requires that all geoscientific information submitted to the agency in support of an injection well permit application must be prepared by a licensed professional geoscientist (PG) or licensed professional engineer (PE) and must be sealed by the PG or PE in accordance with the Texas Geoscience Practice Act and the Texas Engineering Practice Act.

[3] PFD, pages 85-86
[4] PFD, page 66

The professional practice of geoscience necessarily relies on inference and extrapolation to describe the subsurface geology because an entire study area cannot practically be bored, cored and measured to provide data on geologic properties such as porosity, permeability, reservoir fluid pressure and formation thickness. Commission rules require the submission of geologic descriptions, structure maps, isopach maps, cross-sections, fault delineation and predictive modeling.[5] All of this information requires the educated inference and extrapolation of a licensed PG to provide understanding of the subsurface geology in any area that has not been directly accessed and measured. The Texas Board of Professional Geoscientists (Board) issued Guidance Document No. 1 on the use and application of the PG seal. (Attachment A). The Board explains that geoscientific documents that provide interpretation or analysis require a PG seal and provides examples including cross-sections displaying geological or geophysical parameters; contoured drawings such as isopach maps; well logs; geophysical maps; *interpretations* of geophysical surveys; and *interpretations*, conclusions and recommendations for further action based on these data. Submission of geologic information in support of a Class I injection well permit application, including information on local geology necessarily requires the use of professional interpretation. The PFD should not have discounted the applicant's interpretation of geoscientific information on local geology submitted in compliance with Board requirements and Commission rule.

The PFD also minimizes the significance of the completion report and the consideration of information obtained from the drilling, construction and testing of the injection well before it can be put into service for waste disposal. While 30 TAC §331.121 does establish the information that must be considered *before* issuing a Class I injection well permit, the commission rules also contemplate that some information must be provided *after* the initial drilling, construction, completion and testing of the well. The injection well cannot be constructed without a permit.[6] The rule provisions for pre-permit issuance consideration must be interpreted to give effect to the rule provisions for the post-permit considerations. The permit application must describe the *proposed* formation testing program to obtain an analysis of the chemical, physical and radiological characteristics of formation fluids, and other information on

[5] 30 TAC §331.121(a)(2)(D), (a)(2)(E), (a)(2)(F), (a)(2)(P), and (c)(2)(C)
[6] 30 TAC §331.3(a); Texas Water Code §27.011

the injection zone and confining zone.[7] The permit application must provide the construction procedures including cementing and casing program, well material specifications, logging procedures, deviation checks, and a drilling, testing, and coring program.[8] If a permittee decides to drill and construct the injection well after a permit is issued, a completion report must be submitted for the Executive Director's review and approval. The report provides information that is not available and cannot be available until the actual and specific well is drilled, constructed and completed. As described in in §331.65(b)(1), the completion report provides for the possibility that new information gleaned from drilling, construction and testing may deviate from the information provided with the application for permit.[9] The Executive Director must consider all of the information that is delineated in paragraph (1)(A)-(K) of §331.45 in making the determination whether to grant approval of the construction and completion. The completion report is expected to provide information on measured porosity from core samples from the drilled borehole and from open-hole logs; measured permeability from the injectivity/pressure fall-off test; measured reservoir static pressure at the well location; measured confining zone, injection zone and injection interval thickness at the well location; adjusted pressure build-up model predictions based on parameters observed during well construction; new cone of influence determination based on data obtained during well logging and testing of the well and formation; *and any revision to the information submitted in the application for permit under §331.121*. This information provided in the completion report could not be provided without construction of the subject well and, it is not reasonable to

[7] 30 TAC §331.121(a)(2)(H)
[8] 30 TAC §331.121(a)(2)(O)
[9] The completion report includes: (A) actual as-built drilling and completion data on the well; (B) logging and testing data on the well; (C) a demonstration of mechanical integrity; (D) anticipated maximum pressure and flow rate at which the permittee will operate; (E) results of the injection zone and confining zone testing program; (F) *adjusted* formation pressure increase calculations, fluid front calculations and *updated* cross-sections of the confining and injection based on the data obtained during construction and testing; (G) the actual injection procedure; (H) the compatibility of injected waste with fluids in the injection zone and minerals in both the injection zone and confining zone and materials used to construct the well; (I) the calculated area of review and cone of influence *based on data obtained during logging and testing of the well and formation*; (J) the status of corrective action required for defective wells in the area of review; (K) a Well Data Report on forms provided by the executive director; (L) compliance with the casing and cementing performance standard; and (M) compliance with the cementing requirements.

require the information that the rules allow to be submitted after well construction to be submitted prior to well construction.

III. The record supports the adequate assessment of faults under applicable rules

The Executive Director does apply the 30 TAC §335.205(a)(5)(A) siting restriction to the review of *nonhazardous* Class I wells. An application for an injection well permit must also provide a demonstration on fault transmissivity under 30 TAC §331.121(a)(2)(P). However, both rules address the migration of "hazardous constituents" out of the injection zone. A hazardous constituent could be present in an injected waste when the operator is authorized to inject hazardous waste or when the injected waste is regulated as nonhazardous due to some applicable exclusion from the definition of "hazardous waste," but certain chemical constituents may still be present. The Commission defines hazardous waste constituent in 30 TAC §335.1(83) as a constituent that caused the EPA administrator to list the hazardous waste in 40 Code of Federal Regulations (CFR) Part 261, Subpart D or a constituent listed in Table 1 of 40 CFR §261.24. The draft permits identify the nonhazardous wastes authorized to be injected.[10] No rebutting evidence was presented on the presence of a hazardous constituent in the injected fluids or native to the injection zone that might migrate out of the injection zone. The PFD did not address the "hazardous constituents" in §335.205(a)(5)(A) or §331.121(a)(2)(P).

The Executive Director also considers transmissive faults in applying rule §331.121(c)(3)(B)(i); Class I injection wells shall be sited such that the confining zone is laterally continuous and free of transecting, transmissive faults or fractures over an area sufficient to prevent the movement of fluids into an underground source of drinking water or freshwater aquifer. The record supports findings and conclusions that thick, continuous, low-permeability shales and clay in the confining zone present a barrier to vertical migration of injected fluids. The application describes the confining zone as a 450-foot thick zone within the upper Frio Formation from a subsurface depth of 2,350 to 2,800 feet GL with net shale thickness of 300 feet.[11] The application states that the thickness of the confining zone exceeds the maximum

[10] Exhibits ED-8, Draft permits WDW423 and WDW424, Section VI. A., p. 2
[11] Exhibit APP Ex.1-001911.

throw of any of the described faults, eliminating the possibility that the confining zone can be circumvented by the faulting.[12] The record supports findings that the large thickness of shale above the injection interval and within the confining zone, provides extensive shale-to-shale contact along fault planes of the delineated faults to prevent vertical migration of formation fluids and/or injected fluids.[13]

IV. The PFD mischaracterizes the Executive Director's position on monitoring

The PFD does not accurately reflect the Executive Director's position on monitoring, incorrectly stating that the Executive Director suggested that monitor wells are "never appropriate for Class I injection wells."[14] The Executive Director never stated this or made such a suggestion.

Referred Issue B asks whether the draft permit provides for adequate monitoring of migration of injected fluids in the vicinity of the proposed injection wells. The PFD recommends remand to provide additional consideration of site-specific conditions and the development of a monitoring program. The record of this hearing does show inconsistency from the various rules, testimony, exhibits and argument regarding the terminology for "monitoring," "monitoring program," "monitoring system," "ambient monitoring," and "monitor wells." The record supports findings and conclusions that the draft permits provide for adequate monitoring of migration of injected fluids in the vicinity of the proposed injection wells.

Adequate monitoring of injected fluids does not necessarily involve the installation and operation of one or more separate monitor wells. Monitoring requirements for Class I injection wells are established in 30 TAC §§305.125, 305.154, and 331.64.[15] The draft permit requires monitoring, including: annual mechanical integrity testing of the casing, injection tubing, annular seal, and bottom-hole cement for leaks using a pressure test and radioactive tracer survey, annual pressure build-up analysis, evaluation of fluid movement every five years using an approved geophysical method, and evaluation of the casing each time the well is subjected to workover procedures.[16] The draft permits require continuous corrosion monitoring performed on the

[12] Exhibit APP Ex.1-001919.
[13] Exhibit ED-1, p. 12, lines 37-40; ED-01.000012
[14] PFD, p. 84
[15] Exhibit ED-1, p. 9, lines 26-28; ED–01.000008.
[16] Exhibit ED-1, p. 10, lines 2-7; ED–01.000010.

wellhead, injection tubing, packer and casing materials.[17] Ambient monitoring of the injection zone is provided by the annual monitoring of the pressure buildup in the injection zone conducted in an injectivity/pressure fall-off test under 30 TAC §331.64(h)(2).[18] All of this required monitoring could be considered as a monitoring program to assure that fluids placed into the injection well remain in the well until entering the injection zone and do not enter any unauthorized zone even though separate monitor wells are not involved.

While the Executive Director's recommendation and draft permits do not require the installation and operation of separate monitor wells, the Executive Director may prescribe a monitoring system that involves installation of one or more monitor wells. The Commission retains authority to impose permitting requirements to require the installation of monitor wells as needed to protect fresh water from pollution.[19] If the injection wells are never installed, there is no need for any monitoring. The siting, design, and operation of a monitor well would depend on specific information available only after construction and testing of the injection well. Such information would include measured depths and thicknesses of the injection and confining zones, and results of injection zone pressure fall-off testing that may show the presence of any flow boundaries in the formation such as a sealing fault. The Executive Director considers it premature to require monitor wells before the permitted injection well is drilled, constructed and tested.

V. The PFD prematurely imposes corrective action

In addressing Issue C, whether the location and design of the injection well and pre-injection facilities are adequate, the PFD identifies two abandoned gas wells with uncertain plugging history that render the location of the proposed injection wells inadequate. As discussed above, the Executive Director contends that the consideration of the condition of artificial penetrations in the area of review was not one of the disputed issues of fact or law referred by the Commission for hearing.

The PFD recommends that the Commission prescribe corrective action to address the inadequate plugging history of the Gleisner No. 2 well, situated 1000-1500 feet from

[17] Exhibit ED-1, p. 10, lines 12-14; ED–01.000010.
[18] Exhibit ED-1, p. 10, lines 14-16; ED–01.000010.
[19] 30 TAC §§305.158, 331.3(c), 331.5(a) and 331.62(h)(1)

the proposed injection wells. Yet, for the inadequate plugging history of the Hausman No. 2 well, situated 5000 feet from the proposed injection wells, the PFD somehow concludes that "ambient monitoring" under 30 TAC §331.64(h)(1) is appropriate. The PFD does not explain why corrective action measures should be prescribed for the inadequately plugged Gleisner No. 2 well, but installation of a monitor well should be prescribed for the inadequately plugged Hausman No. 2 well.

Corrective action measures typically include changing the injection well operating parameters, such as reducing injection pressure, or conducting further investigation of a suspect well within the area of review. In some cases, the operator may even be required to seek permission to enter property and re-plug and abandon a previously closed or plugged well. These measures prevent an excessive pressure front from reaching the artificial penetration or prevent upward travel of fluids through the borehole. If there is an improperly plugged well in the area of review that could transport fluids out of the injection zone, installation and operation of a monitor well would not prevent the fluids from moving into the improperly plugged well.

Based on the review of the modeling of the COI presented in the application, the Executive Director is not aware of the presence of any artificial penetration in the area of review, including the Gleisner No. 2 well and the Hausman No. 2 well, that is inadequately constructed, completed or abandoned in such a manner that may cause the pollution for fresh water as a result of injection activities authorized in WDW423 and WDW424.[20] As part of the well completion report, the permittee must recalculate the COI based on measured formation properties at the well; a higher calculated pressure or larger COI could require the consideration of additional artificial penetrations in the area of review. After a permit is issued, the permittee must submit an injection zone annual report that includes location of newly constructed or newly discovered wells that penetrate the confining zone and/or injection zone within the area of review under 30 TAC §331.65(c)(3). If additional information is submitted or discovered that a well within the applicable area of review might pose a hazard to an underground source of drinking water or freshwater aquifer, the Commission may prescribe a corrective action plan and compliance schedule as a condition for continued injection activities as provided in §331.44(b)(6). The obligation to review

[20] Exhibit ED-1, p. 13, lines 33-38 (ED-01.000013).

artificial penetrations in the area of review and implement corrective action is ongoing and continues after initial permit issuance.

There is no need to impose corrective action measures before the permitted injection wells are constructed. If the wells are never constructed, no further corrective measures would need to address artificial penetrations in the area of review. If the wells are constructed, new information will be obtained and presented in the well completion report. This information would include new COI modeling to predict pressure buildup in the injection reservoir based on measured formation properties at the borehole. The results of the adjusted modeling will determine whether corrective action measures are needed to address the Gleisner No. 2 well, the Hausman No. 2 well, and any other artificial penetration in the area of review.

VI. Reopening of the Record

The Executive Director contends that the weight of the evidence in the record supports findings and conclusions for granting the draft permits. Alternatively, if the Commission determines that additional information is needed to make a decision on the application, the Executive Director supports the reopening of the record for further proceedings as described in 30 TAC §80.265. This process allows for the Commission to order the administrative law judges to reopen the record for further proceedings on specific issues in dispute. The Commission's order should include instructions as to the subject matter of the proceedings and the judges' duties in preparing supplemental materials or revised orders based on the proceedings. The Executive Director is not aware of a Commission rule that provides for remand of a contested application *back to the Executive Director* for further consideration as recommended in the PFD.

VII. Conclusion

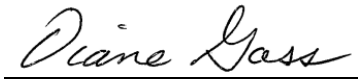
The Executive Director recommends that the commission make findings and conclusions that UEC has met its burden of proof on all issues and that the final draft permits be granted.

Respectfully submitted,

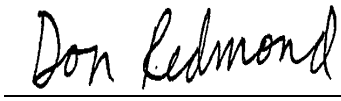
Texas Commission on Environmental Quality

Kelly Keel
Executive Director

Charmaine Backens, Deputy Director
Environmental Law Division



Diane Goss
Staff Attorney
Environmental Law Division
State Bar of Texas No. 24050678
MC-173, P.O. Box 13087
Austin, Texas 78711-3087
Phone: (512) 239-5731



Don Redmond
Staff Attorney
Environmental Law Division
State Bar of Texas No. 24010336
MC-173, P.O. Box 13087
Austin, Texas 78711-3087
Phone: (512) 239-0612

REPRESENTING THE EXECUTIVE
DIRECTOR OF THE TEXAS COMMISSION
ON ENVIRONMENTAL QUALITY

ATTACHMENT A

TEXAS BOARD OF PROFESSIONAL GEOSCIENTISTS

P.O. Box 13225 • Austin, Texas 78711 • (512) 936-4400 • fax (512) 936-4409
Website: www.tbpg.state.tx.us

Guidance Document No. 1
Use and Application of the P. G. Seal

The Texas Board of Professional Geoscientists (TBPG) is authorized by Texas Geoscience Practice Act (TGPA) to regulate the public practice of geoscience in Texas. Texas Administrative Code (TAC) section 851.156(k) specifies the requirement for a Professional Geoscientist (PG) to seal professional geoscientific work offered to the public for the purpose of showing that the work was performed under the Responsible Charge of a licensed Professional Geoscientist (PG). Upon sealing the geoscience work product, the PG takes full responsibility for the geoscience service(s) provided. This guidance seeks to clarify TAC section 851.156 of the PG rules that addresses which documents may, or may not, require a PG seal.

In general, geoscientific documents that provide interpretation or analysis will require the seal of a PG. Examples of interpretation of geoscience data include, but are not limited to:

- Cross sections displaying geoscience data, including geological and/or geophysical parameters;
- Contoured drawings, such as potentiometric surface maps, isopach maps, and subsurface data;
- Aquifer test analyses, including yield, transmissivity, specific storage, etc.;
- Groundwater modeling;
- Surface and availability studies;
- Geoscientific components of groundwater management plans;
- Soil boring logs and well logs;
- Soil, lithology, and/or geophysical maps;
- Interpretation of geophysical surveys; and
- Interpretations, conclusions, and recommendations for further action(s) based on these data.

Much consulting work performed by technical staff is geoscientific in nature, but may not require a PG seal. For example, collecting the initial field data and the compiling of this information may not necessarily constitute geoscience, or require a PG to perform or seal the work product if these activities are completed following a protocol that was developed under Responsible Charge of a licensed PG.

Other examples of data collected that would be geoscientific in nature but may not necessarily require a PG to collect or compile include, but are not limited to:

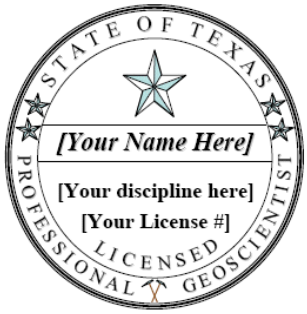
- Surface and groundwater level measurements;
- Surface and groundwater sample collection;

- Soil moisture measurement;
- Soil sample collection
- Compilation of geoscientific data into tables or graphs; and
- Distribution of published geoscientific data to the public.

Although the collection of field or technical data may not require a licensed PG, persons performing these functions should be properly and regularly trained by qualified personnel, to ensure accuracy of the information provided for review by the licensed PG in Responsible Charge of the geoscientific work.

For work that is both engineering and geoscience, please refer to the Memorandum of Understanding between the TBPG and the Texas Board of Professional Engineers (TBPE), dated September 14, 2010. The MOU can be found on the TBPG website at: http://tbpg.state.tx.us/tbpg/moas-and-mous/.

The TBPG PG seal design is specified in 22 TAC section 851.156 (b) "Professional Geoscientist Seals and Geoscience Firm Identification" which is found on the TBPG website at: http://tbpg.state.tx.us/tbpg/rules/. TAC section 851.156 (b) provides the following generalized seal image to be used:



Because of the wide variety of data collection and interpretation efforts in the geoscientific profession, it is expected that licensed professional judgment will be required to determine when and how PG seals are applied. For use of the PG seal when disseminating established geoscience data, please see the FAQs link on the TBPG website at http://tbpg.state.tx.us/enforcement/enforcement-faqs/ or by contacting TBPG staff at (512) 936-4400. If statements in this guidance document are in conflict with the TGPA or the TAC, the TGPA or TAC prevails.

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2024, the "Executive Director's Exceptions to the Proposal for Decision" was filed with the State Office of Administrative Hearings and the TCEQ Office of the Chief Clerk and served electronically to the parties listed in the attached Service List.

Diane Goss

Diane Goss
Staff Attorney
Environmental Law Division
State Bar of Texas No. 24050678
MC-173, P.O. Box 13087
Austin, Texas 78711-3087
Phone: (512) 239-5731

SERVICE LIST

Mr. Adam Friedman
afriedman@msmtx.com
MCELROY, SULLIVAN, MILLER & WEBER, L.L.P.
4330 Gaines Ranch Loop
Austin, Texas 78735
Attorneys for Goliad County GCD

Mr. John H. H. Bennett
john@texasenergylaw.com
OSBORN & BENNETT LLP
816 Congress Avenue, Suite 1620
Austin, Texas 78701
Attorney for Aligned Landowners

Mr. David J. Tuckfield
david@allawgp.com
THE AL LAW GROUP PLLC
12400 West Hwy 71, Suite 350-150
Austin, Texas 78738
Attorney for Uranium Energy Corp.

Mr. Bill Cobb
bill@cobbxcounsel.com
COBB & COUNSEL
501 Congress Avenue, Suite 150
Austin, Texas 78701
Attorney for Uranium Energy Corp.

Mr. Andrew N. Barrett
andy@thebarrettfirm.com
ANDY BARRETT & ASSOCIATES, PLLC
3300 Bee Cave Road, Suite 650 #189
Austin, Texas 78746
Attorney for Uranium Energy Corp.

Ms. Jennifer Jamison
jennifer.jamison@tceq.texas.gov
OFFICE OF PUBLIC INTEREST COUNSEL
P.O. Box 13087, MC 103
Austin, Texas 78711
Assistant Public Interest Counsel