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Department of Agriculture
and Natural Resources

BEFORE THE STATE OF SOUTH DAKOTA
DEPARTMENT OF AGRICULTURE AND NATURAL RESOURCES
BOARD OF MINERALS AND ENVIRONMENT

IN THE MATTER OF CLEAN NUCLEAR)
ENERGY CORP. URANIUM EXPLORATION)
PERMIT APPLICATION)
EXNI 453)

INTERVENOR LILIAS JONES JARDING

**ANSWERS TO CLEAN NUCLEAR ENERGY CORP.'S INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS**

TO: Matthew E. Naasz

Gunderson Palmer Nelson & Ashmore LP

Attorney for Clean Nuclear Energy Corp.

Intervenor Lillas Jones Jarding submits her answers to the Interrogatories and Requests for Production of Documents by Clean Nuclear Energy Corp.

INTERROGATORY NO. 1: Describe in detail all adverse effects you allege will be caused by the proposed uranium exploration project operation on the historic, archaeological, geologic, scientific, or recreational aspects of affected or surrounding land.

ANSWER:

- Fall River County has passed an initiative against uranium mining which is, among other things, an assertion of local control that should be respected.

- The proposed drilling could impact surface and ground water.
- Drilling would cause noise, lights and traffic in a protected, world-class area where silence and a lack of disruption are required.
- There may be as yet un-catalogued cultural, historical, and/or archeological sites in the proposed drilling area.
- The adverse effects of the proposed exploration on historic, recreation, cultural, archeological, and geological aspects of the affected and surrounding land outweigh the benefits of the proposed exploration project.
- The impacts of 50 drilling pads would result in loss or reduction of long-range productivity of the land and water.
- Past uranium drilling has left a number of drill holes, which are unreclaimed and could be improperly plugged, which could exacerbate water contamination or wastage.

INTERROGATORY NO. 2: Describe in detail all information relating to any alleged loss or reduction of long range productivity of watershed lands, public and domestic water wells, aquifer recharge areas, or significant agricultural areas you allege will be caused by the proposed project.

ANSWER: This is not known yet, as research is not completed.

INTERROGATORY NO. 3: Explain in detail all information relating to any alleged adverse effects to threatened or endangered wildlife indigenous to the area that you allege will be caused by the proposed uranium exploration operation.

ANSWER: Research has not yet begun on this topic.

INTERROGATORY NO. 4: Please state the full name of the person or persons answering these interrogatories and the person's position, title, and or relationship to the named intervenor.

ANSWER: Liliias Jones Jarding, PhD: Self.

INTERROGATORY NO. 5: Prior to answering these Interrogatories, have you made a due and diligent search of your books, records, papers, and documents, and a due diligent inquiry of your employees, agents, or representatives and their books, records, papers, and documents, for the purpose of eliciting and securing all of the information which is required to answer these Interrogatories?

ANSWER: This search is ongoing, but is not complete. I do not have any employees, agents, or representatives.

INTERROGATORY NO. 6: Please identify any person you expect to call to testify at the time of trial.

ANSWER: Full witness list will be provided by the appropriate deadline.

INTERROGATORY NO. 7: Have You made any investigations, examinations, test or analysis concerning any manner [sic] relating to the subject matter of the pending action. If so, for each investigation, examination, test, or analysis, please state:

- (a) It's [sic] nature of the method used to make it;
- (b) It's [sic] subject matter;
- (c) The name and present address of each person who made it;
- (d) The time and place where it was made; and
- (e) The purpose of making it.

ANSWER: None at this time.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1: Please provide a copy of all investigations, examinations, tests or analysis identified in Interrogatory No. 7.

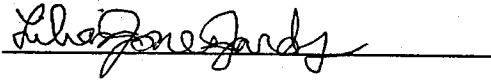
ANSWER: None at this time.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2: Please produce a copy of all documents related to your responses in Interrogatories Nos. 1 – 3.

ANSWER: All exhibits will be provided by the relevant deadline.

Submitted this 27th day of October, 2025

By:

A handwritten signature in black ink, appearing to read "Lillas Jones Jarding", is written over a horizontal line.

Lillas Jones Jarding, Ph.D.

Intervenor

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original of the Intervenor's Answers to Clean Nuclear Energy Corp.'s Interrogatories and Request for Production of Documents were served electronically, and by United States Mail, First Class, Postage Prepaid upon the following to be filed in the above captioned matter:

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Further, the undersigned certifies that true and correct copies of the above referenced documents were served via United States Mail, First Class, Postage Prepaid upon the following:

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Dated this 27th day of October, 2025

Signature:

