

OCT 06 2025

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

FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION

TO: Matthew E. Naasz

Gunderson Palmer Nelson & Ashmore LP

Attorney for Clean Nuclear Energy Corp.

Intervenor Lillas Jones Jarding, pursuant to SDCL §§15-6-26 and 15-6-33, requests that the applicant Clean Nuclear Energy Corp. answer the following Interrogatories and requests for production within 30 days.

Instructions

1. Any information held by any person acting or providing answers on your behalf will be revealed in the answers.
2. These interrogatories and requests for production shall be deemed to be continuing. If information is discovered by or becomes known to you, your attorney or anyone acting on your behalf after answering these interrogatories and requests for production, which would change or add to the answer given, you are requested to furnish the information in a timely manner, under oath, to the undersigned.

3. Any word written in these interrogatories and requests for production that is in the singular shall be considered as plural, and vice versa, when necessary to facilitate any answer.
4. Where an answer to an interrogatory or request for production is based in whole or in part on any documents, please identify with specificity each document on which an answer is based.
5. If, and to the extent an interrogatory or request for production is objected to on the basis that the answer requires identification of a document containing privileged information, state with particularity the privilege claimed and all underlying facts upon which the privilege is based.
6. Any objection to answering an interrogatory or request for production or claim of privilege or other exemption from discovery shall state in detail the grounds for the objection.
7. If there are documents not currently in your possession, but which you can obtain from former employees, agents or contractors, such additional documents are included in this request.
8. If your response to any interrogatory or request for production is that the documents are not in your possession or custody, describe in detail the unsuccessful efforts you have made to locate the records.
9. If your response to any interrogatory or request for production is that the documents are not in your control, identify the location and person with control of the records, and provide any documents that contain all or part of the information contained in the requested document or category of documents.

Definitions

1. The term “documents” has the meaning ascribed to it in SDCL §15-6-34(a) and shall include all originals, drafts and revisions of such documents and attachments to such documents. It shall include any electronic or written copy, regardless of origin or location, of any written, typed, printed, recorded or graphic material of any kind, however produced, including but not limited to any book, manual, pamphlet,

memorandum, letter, email, report, record, data sheet, tape, or digital recording, or other written, printed or recorded material.

2. The term “identify” means (i) to provide the name, address, telephone number, job title and position or description of duties for each individual; (ii) to provide the date, author, recipient and subject matter of each document; (iii) to provide, with respect to any oral communication, the time and place of making the substance of the communication and the identity of the makers, recipients and witnesses to the communication.
3. The term “person” shall include a natural person, or agency or other group however organized.
4. The terms “relate to” or “relating to” means discussing, describing, reflecting, containing, analyzing, studying, evidencing, constituting, setting forth, considering, concerning, recommending or pertaining to, the event, person or object.
5. The term “application” or “proposed project” means the Clean Nuclear Energy Corp. uranium exploration application identified in the above caption and docket.

Interrogatories

INTERROGATORY NO. 1 State the name, current address and telephone number of each person, other than your legal counsel, who assisted you in answering these interrogatories and requests for production or who provided information you relied upon in answering these interrogatories or requests for production.

INTERROGATORY NO. 2 State the name, current address and telephone number of each person who is a contractor for this proposed project, or with whom a contractor relationship has been discussed.

INTERROGATORY NO. 3 State the routes and distances of the “overland travel” that is proposed in the application to, from, among, and between drill sites for this proposed project?

INTERROGATORY NO. 4 State the name, above-ground location, depth, rock/aquifer formation, and owner of all water supplies that have been sought or obtained for the proposed project.

INTERROGATORY NO. 5 State the following information for the applicant, their former parent company (Basin Uranium) and their current parent company (Nexus Uranium): The date, regulatory agency, potential violation, outcome, environmental damages, and any fine, revocation or other penalty for any past or currently active warning, charges, or violation involving any environmental law of any jurisdiction in which the applicant and its parent companies have been involved.

INTERROGATORY NO. 6 State the name, current address and telephone number of the project manager for this proposed project.

Requests for Production

REQUEST FOR PRODUCTION NO. 1 All maps in the possession of the applicant, its past parent company, or its current parent company showing the locations of all past drill holes on the proposed project area and adjoining sections in all directions, including diagonally.

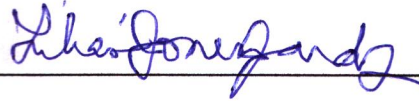
REQUEST FOR PRODUCTION NO. 2 All well drilling logs in the possession of the applicant, its past parent company, or its current parent company for all past drill holes on the proposed project area and adjoining sections in all directions, including diagonally.

REQUEST FOR PRODUCTION NO. 3 All documents in the possession of the applicant, its past parent company, or its current parent company related to plugging and reclamation for all past drill holes on the proposed project area and adjoining sections in all directions, including diagonally and including those showing specific activities and methods for specific drill holes.

REQUEST FOR PRODUCTION NO. 4 All documents related to communication with any Tribal Historic Preservation Officer related to the proposed project.

Submitted this 30th day of September, 2025

By:



Lillas Jones Jarding, Ph.D.

Intervenor

Post Office Box 591

Rapid City, South Dakota 57709

lillasjarding@gmail.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original of the Intervenor's First Set of Interrogatories and Request for Production was served electronically, and by via United States Mail, First Class, Postage Prepaid upon the following to be filed in the above captioned matter:

Brenda Binegar
Department of Agriculture & Natural Resources
523 E Capitol Ave Pierre, SD 57501
Email: Brenda.Binegar@state.sd.us

Further, the undersigned certifies that a true and correct copy of the above referenced document was served via United States Mail, First Class, Postage Prepaid upon the following:

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Counsel Minerals, Mining, & Superfund
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PO Box 590 Eagle Butte, SD 57625

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2337 Wilson Ave Hot Springs, SD 57747

Steven Gunn, Attorney at Law
Oglala Sioux Tribe
PO Box 1204 Pine Ridge, SD 57770

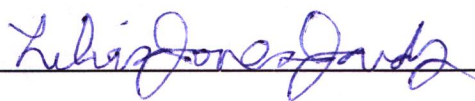
A courtesy copy of the above-referenced document was served by electronic mail upon the following:

Bob Morris, Hearing Chair

PO Box 370 Belle Fourche, SD 57717

bobmorris@westriverlaw.com

Dated this 30th day of September, 2025

By: 

(Signature)

RECEIVED

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TO: Steven R. Blair

Deputy Attorney General

Office of the Attorney General

State of South Dakota

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REQUEST FOR PRODUCTION NO. 2 All well drilling logs in the possession of the State of South Dakota for past drill holes on the proposed project area and all adjoining sections in all directions, including diagonally.

REQUEST FOR PRODUCTION NO. 3 All records in the possession of the State of South Dakota related to plugging and reclamation for past drill holes on the proposed

project area and all adjoining sections in all directions, including diagonally, and including those showing specific activities and methods for specific drill holes.

REQUEST FOR PRODUCTION NO. 4 All communication records of any type with any Tribal Historic Preservation Officer related to the proposed project, except for detailed protected sites' locations.

REQUEST FOR PRODUCTION NO. 5 All reports of the State Historic Preservation Officer related to the proposed project area and all adjoining sections in all directions, including diagonally.

REQUEST FOR PRODUCTION NO. 6 All reports and communication records of any type with South Dakota Game, Fish, and Parks related to the proposed project area, with redactions to protect detailed locations of federal or state protected species, if any.

Submitted this 30th day of September, 2025

By: 

Lillas Jones Jarding, Ph.D.

Intervenor

Post Office Box 591

Rapid City, South Dakota 57709

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Bob Morris, Hearing Chair

PO Box 370 Belle Fourche, SD 57717

bobmorris@westriverlaw.com

Dated this 30th day of September, 2025

By: _____

(Signature)