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## STATE OF SOUTH DAKOTA DEPARTMENT OF AGRICULTURE & NATURAL RESOURCE and Natural Resources BOARD OF MINERALS AND ENVIRONMENT

APPLICATION EXNI 453	) )	Requests for Production of Documents	
IN THE MATTER OF CLEAN NUCLEAR ENERGY CORP. URANIUM EXPLORATION PERMIT	)	Intervenor Response to answer Clean Nuclear Energy Corp.'s Interrogatories &	

To: Matthew E. Naasz

Gunderson, Palmer, Nelson & Ashmore LP Attorney for Clean Nuclear Energy Corp.

Comes now Gena Parkhurst, Intervenor in the above titled manner with responses to Clean Nuclear Energy Corp. Interrogatories & Requests for Production of Documents.

**Interrogatory** #1- I am concerned that this proposed project would most likely have adverse effects on "historic, archaeologic, geologic, scientific, or recreational aspects of affected or surrounding land." The dangers greatly outweigh the potential benefits.

Interrogatory #2 – Not applicable to my concerns.

**Interrogatory** #3 – I am concerned about the impacts to cultural resources in this particular area, including rock drawings that were created about 7,000 years ago.

I may or may not submit further documents by the stated deadline of December 1<sup>st</sup>

Interrogatory #4 – Gena Parkhurst. I am an Individual Intervenor.

**Interrogatory** #5 – Further research is ongoing.

**Interrogatory** #6 – In the event that I plan to submit a non-expert witness, he or she will be named by the stated deadline of December 1<sup>st</sup> as indicated by the scheduling order.

Interrogatory #7 – Not applicable to my concerns.

Request for the Production of Documents

#1 – Not applicable

#2 - Not applicable

Submitted this 13<sup>th</sup> Day of November, 2025

Gena Parkhurst, Individual Intervenor

514 Americas Way #20805

Box Elder, SD 57719

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Department of Agriculture and Natural Resources

## CERTIFICATE OF SERVICE

The undersigned certifies that the Response to Interrogatory and Request for Product of Documents was sent on November 13, 2025 via U.S. First Class Mail, Postage Prepaid upon the following:

Brenda Binegar
Department of Agriculture and Natural Resources
523 East Capitol Avenue
Pierre, SD 57501

Matthew E. Naasz Gunderson, Palmer, Nelson & Ashmore LLP PO Box 8045 Rapid City, SD 57709

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Gena Parkhurst, Individual Intervenor

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