

From: Peter Capossela <peter@pejutatokahe.com>

Sent: Monday, November 24, 2025 12:57 PM

To: Binegar, Brenda <Brenda.Binegar@state.sd.us>

Subject: [EXT] EXNI 453 filing - Great Plains Tribal Water Alliance discovery ans

Ms. Binegar -- attached for filing in the above-referenced docket are the Great Plains Tribal Water Alliance answers to interrogatories and document requests from the applicant, for filing in this docket.

Also, please note that I have a new email address, as identified below. Thank you.

Peter

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**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 GREAT PLAINS TRIBAL WATER ALLIANCE, INC.
ANSWER TO CLEAN NUCLEAR CORP. INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS**

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 affecting or surrounding land.

ANSWER: The geologic formation at Craven Canyon will be compromised, affecting archaeological sites and water quality. Truck traffic and industrial equipment that would be brought to the drill pads will pollute the air and disturb Tribal ceremonial uses of land and the gathering of plants above and in Craven Canyon, and cause public safety concerns. Plants gathered by Tribal members will be exposed to airborne contaminants. Critical habitat for endangered species will be degraded.

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: There is risk that the percentage of certain contaminants related to uranium exploration will increase in indigenous natural foods that are gathered by Tribal members.

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.

geographic features containing existing roosts of endangered northern long-eared bats in adjacent areas in the Black Hills.

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: Errol "Doug" Crow Ghost, Chairman, Board of Directors, Great Plains Tribal Water Alliance, Inc.

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 search 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 questions.

ANSWER: Objection. This interrogatory requires divulging information protected by the attorney-client privilege.

INTERROGATORY NO. 6 Please identify any person you expect to testify at the time of trial. For each potential witness, please identify:

- a) Each person's full legal name and any other names by which he/she has been or is presently known;
- b) Each person's occupation and the name and address of the person's employer(s), if any;
- c) Each person's present address resident address, giving the street number, city and state;
- d) What information each witness is expected to testify about.

ANSWER: See Clean Energy Corp.'s Answers to Great Plains Tribal Water Alliance Interrogatories and Request for Production of Documents, Answer to Interrogatory No. 2.

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

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

ANSWER: Objection. The Great Plains Tribal Watet Alliance does not understand this Interrogatory. It is not comprehensible.

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

ANSWER: See answer to Interrogatory No. 7.

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2
documents related to your responses to Interrogatories Nos. 1-3.

Please produce a copy of all

ANSWER: See Clean Energy Corp.'s Answers to Great Plains Tribal Water Alliance Interrogatories and Request for Production of Documents, Answer to Request for Production of Documents No. 1.



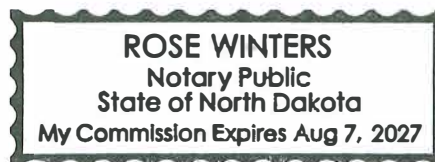
Errol "Doug" Crow Ghost Jr.

STATE OF NORTH DAKOTA)
 :
COUNTY OF SIOUX)

SUBSCRIBED AND SWORN TO before me
this 17 day of November 2025




NOTARY PUBLIC



My commission expires 8-7-2027

DATED this 17th day of November 2025

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day, a copy of the afore was served via U.S. mail with proper postage affixed to:

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DATED this 21st day of November 2025

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