

From: Binegar, Brenda <Brenda.Binegar@state.sd.us>
Sent: Tuesday, November 4, 2025 4:45 PM
To: Holm, Eric <Eric.Holm@state.sd.us>
Cc: Lees, Michael <Michael.Lees@state.sd.us>; Hudson, Roberta
<Roberta.Hudson@state.sd.us>
Subject: FW: [EXT] Clean Nuclear Energy Corp.

From: Anna Applegate <aapplegate@gpna.com>
Sent: Tuesday, November 4, 2025 4:41 PM
To: Bob Morris <bobmorris@westriverlaw.com>; Binegar, Brenda
<Brenda.Binegar@state.sd.us>
Cc: Matthew Naasz <mnaasz@gpna.com>
Subject: RE: [EXT] Clean Nuclear Energy Corp.

Greetings,

Attached please find Clean Nuclear Energy Corp.'s Answers to Interrogatories and Requests for Production of Documents.

Thank you,

Anna Applegate



Legal Assistant to Talbot J. Wiczorek and Matthew E. Naasz

Phone: (605) 342-1078 | Fax: (605) 342-9503

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November 4, 2025

Matthew E. Naasz
Email: mnaasz@gpna.com
Direct Dial: (605) 719-3424

Brenda Binegar
DANR
523 East Capitol Avenue
Pierre, SD 57501

Re: Clean Nuclear Energy Corp.
GPNA File No. 17359.0002

Greetings:

Enclosed please find Clean Nuclear Energy Corp.'s Answers to Interrogatories and Requests for Production of Documents. A signed signature page will follow.

Sincerely,

A handwritten signature in blue ink, appearing to read 'M. Naasz', is written over a horizontal line.

Matthew E. Naasz

MEN:aa
Enclosure
cc: All Parties

Offices in Rapid City and Pierre, South Dakota

Attorneys licensed to practice in South Dakota, North Dakota, Nebraska, and Wyoming

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

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

EXNI 453

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**CLEAN NUCLEAR ENERGY
CORP.'S ANSWERS TO
CHEYENNE RIVER SIOUX
TRIBE AND OGLALA SIOUX
TRIBE INTERROGATORIES
AND REQUESTS FOR
PRODUCTION OF DOCUMENTS**

TO: CHEYENNE RIVER SIOUX TRIBE AND OGLALA SIOUX TRIBE

Clean Nuclear Energy Corp., by and through undersigned counsel, submit its
Answers to the Interrogatories and Requests for Production by Cheyenne River Sioux Tribe
And Oglala Sioux Tribe.

GENERAL OBJECTIONS

Clean Nuclear Energy Corp., objects to any discovery request that is not relevant to
the specific criteria set forth in SDCL § 45-6D-29. Additionally, Clean Nuclear Energy Corp
objects to any discovery request that seeks information disproportionate to the needs of this
exploration permit application. The following responses are provided subject to these
objections and are provided without waiving the same.

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
or who provided information you relied upon in answering these interrogatories.

ANSWER: Mike Blady. 503-905 Pender St. W, Vancouver, British Columbia, Canada V6C
1L6. Crystal Hocking, RESPEC Engineering 3824 Jet Drive, Rapid City, SD 57703.

INTERROGATORY NO. 2 State the name, current address and phone number of all
witnesses that shall testify at the hearing in this matter on behalf of the applicant.

ANSWER: Witnesses will be identified as set forth in a scheduling order signed by the pre-hearing officer.

INTERROGATORY NO. 3 State the name, current address and phone number of the consulting experts, including consulting archaeologists and engineers, for the application and project.

ANSWER: *See* Clean Nuclear Energy Corp.'s Expert Witness disclosure on file herein.

INTERROGATORY NO. 4 Explain in detail the process of delineating the boundaries of the "project disturbance footprint" for the purpose of determining any potential impacts to historic properties or traditional cultural properties, including all parties consulted in making such determination.

ANSWER: Disturbance for each drill pad was determined based upon the area necessary for the drill pad and associated activities, each approximately 18.3 meter by 18.3 meter per drill pad. The project exploration area, as presented in the EXNI, is a boundary box encompassing all drill holes.

INTERROGATORY NO. 5 What is the depth of the groundwater at the sites of the proposed drill pads?

ANSWER: The exact depth to groundwater will be determined following drilling. Data from historic plugged monitoring wells in the area indicate the lower portion of the Chilson Member of the Lakota Formation lies within a saturated aquifer [Cohan 1984]. The potentiometric map of the Inyan Kara indicates the elevation of the water is above 3,800 ft [Strobel et al, 2000]¹. The maximum depth of the holes will be 700 feet (213 m).

¹ Strobel, M.L., Galloway, J.M., Hamade, G.R., and Jarrell, G.J., 2000. Potentiometric surface of the Inyan Kara Aquifer in the Black Hills area, South Dakota. U.S. Geological Survey, Hydrologic Atlas 745-A.

INTERROGATORY NO. 6 What are the effects of the proposed uranium exploration operation on the long-range productivity of watershed lands, public and domestic water wells, aquifer recharge areas, or significant agricultural areas.

ANSWER: There are no anticipated impacts on long-range productivity of watershed lands, public and domestic water wells, aquifer recharge areas, and significant agricultural areas within five miles of the project footprint.

INTERROGATORY NO. 7 What are the effects of the proposed uranium exploration operation on groundwater, including the depth of the groundwater at proposed drill sites and within the exploration area. Identify all substances that may potentially be discharged into groundwater water as a result of the proposed project.

ANSWER: Objection – Compound. Subject to and without waiving the same: There are no anticipated effects of the proposed uranium exploration project on groundwater, including the depth of groundwater at the proposed drill sites. No substances are intended to be discharged into groundwater. Drilling and plugging materials including bentonite and potentially cement grout may contact near borehole pore water.

INTERROGATORY NO. 8 What are the effects of the proposed uranium exploration operation on threatened or endangered wildlife indigenous to the area.

ANSWER: There are no anticipated effects of the proposed uranium exploration project on threatened or endangered wildlife. See correspondence with South Dakota Game Fish and Parks on file herein.

INTERROGATORY NO. 9 What approvals have been sought or obtained by municipal water sources in Edgemont or Hot Springs, or any other water sources, for use in the proposed project?

ANSWER: None at this time.

INTERROGATORY NO. 10 Identify the number and location of the proposed monitoring wells.

ANSWER: Monitoring wells are not associated with EXNI 453. All exploration holes associated with this project are planned to be plugged immediately upon completion while the drill rig is still on site.

INTERROGATORY NO. 11 Identify all additives, including the composition of non-hazardous polymers, to the drill mud or to be inserted into the drill bore.

ANSWER: Bentonite, and possibly cement grout, would be used for drill hole plugging and abandonment. Additives may or may not be used depending on the drilling conditions. Most non-hazardous polymers have proprietary formulas.

INTERROGATORY NO. 12 What agency is conducting the "NEPA process" referred to in the proposed plan of operation, and what is the status of that process?

ANSWER: NEPA is not applicable to EXNI 453 located on state lands.

INTERROGATORY NO. 13 If the application is approved, and uranium deposits are located, and the mining of such uranium is approved, describe in detail the process or processes to be utilized for its extraction.

ANSWER: Objection. Not relevant to the factors identified in SDCL § 45-6D-29.

INTERROGATORY NO. 14 what are the benefits of the proposed uranium exploration?

ANSWER: The hydrogeologic and mineral resource information received about the uranium deposits located in this area will be a positive effect of the operation. As stated in SDCL § 45-6D-2: "The exploration for and discovery of uranium by means of drilling and other methods of detecting such deposits are important to the economic development of the state and nation."

INTERROGATORY NO. 15 State each contention or fact to be presented at the hearing in this matter for the purpose of asserting that benefits of the proposed uranium exploration outweigh adverse impacts on historic, archaeological, geologic, scientific or recreational aspects of the surrounding land.

ANSWER: There will be no adverse effects on the historic, archeologic, geologic, scientific, or recreational aspects of the surrounding land. The hydrogeologic and mineral resource information received about the uranium deposits located in this area will be a positive effect of the operation. As stated in SDCL § 45-6D-2: “The exploration for and discovery of uranium by means of drilling and other methods of detecting such deposits are important to the economic development of the state and nation.”

INTERROGATORY NO. 16 Explain in detail the basis for CNEC’s estimating that "the nearest listed cultural feature is 0.8 miles from the project."

ANSWER: The estimations of distance have been updated in conjunction with the abbreviated case report provided to the South Dakota State Historical Society on October 29, 2024. Details on the locations of archaeological sites are confidential and protected by state law, SDCL § 1-20-21.2.

INTERROGATORY NO. 17 Describe all meetings, in person or virtual, that have taken place between the applicant and South Dakota officials in relation to the application, including the date, attendees, and matters discussed.

ANSWER: Objection. Not relevant to items articulated in SDCL § 45-6D-29. Additionally, the information requested is disproportionate to the needs of this exploration permit application.

INTERROGATORY NO. 18 What is the relationship, if any, between Cowboy Exploration and Development LLC, RESPEC Company LLC, Clean Nuclear Energy Corp., Basin Uranium Corp. and Nexus Uranium Corp. and what are their roles, if any, in the Application and Project?

ANSWER: Objection. Not relevant to the criteria to be considered pursuant to SDCL § 45-6D-29. Subject to and without waiving the same; see CNEC’s Expert Witness disclosure regarding RESPEC, LLC’s role. [Ask Mike about the ____]

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1 All documents relied upon in answering any of the Interrogatories above.

ANSWER: See documents on file with DANR. Additionally, the documents provided to the South Dakota State Historical Society, which are confidential.

REQUEST FOR PRODUCTION NO. 2 All exhibits CNEC intends to introduce at the hearing in this matter.

ANSWER: These will be disclosed consistent with the scheduling order to be entered in this matter.

REQUEST FOR PRODUCTION NO. 3 All surveys, case reports and other documents relating to archaeological resources, cultural resources, historic properties or traditional cultural or religious properties, that were prepared or consulted in relation to the application.

ANSWER: Objection. The reports contain confidential information regarding the location and character of known archeological sites in South Dakota and is protected by SDCL § 1-20-21.2. Subject to and without waiving the same, see documents on file with the DANR, which are available on their website.

REQUEST FOR PRODUCTION NO. 4 If and to the extent CNEC or its officers, directors, employees, agents or representatives are in possession or control of the exploration area or surrounding lands of the Project, or any part thereof, the Cheyenne River Sioux Tribe and the Oglala Sioux Tribe request that CNEC permit entry upon those lands for the purpose of inspection and measuring, surveying, photographing, testing, or sampling the property and any historic, archaeological, geologic, scientific, recreational, cultural or religious aspects of the lands.

ANSWER: Objection. This is not a Request for Production of Documents. Additionally, this is not relevant to the criteria to be considered pursuant to SDCL § 45-6D-29.

Submitted this ____ day of November, 2025.

By: _____
Mike Blady

Notarial Certificate

I, _____, a Notary Public in and for the Province of _____,
do hereby certify that on this ____ day of _____, 2025, before me personally
appeared Mike Blady, who are personally known to me (or proved to me on the basis of
satisfactory evidence) to be the person whose name is subscribed to the within instrument
and acknowledged to me that he executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal.

SEAL

AS TO OBJECTIONS:

GUNDERSON, PALMER, NELSON
& ASHMORE, LLP



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CERTIFICATE OF SERVICE

The undersigned hereby certifies on November 4, 2025, that the original of CLEAN NUCLEAR ENERGY CORP.'S ANSWERS TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS BY CHEYENNE RIVER SIOUX TRIBE AND OGLALA SIOUX TRIBE was served electronically, and via U.S. First Class Mail, Postage Prepaid upon the following:

Brenda Binegar Department of Agriculture
&. Natural Resources 523 East Capitol Avenue Pierre, SD 57501
Email: Brenda.Binegar@state.sd.us
Secretary, Board of Minerals & Environment

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

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Steven Gunn Oglala Sioux Tribe
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A courtesy copy of the above referenced document(s) was served by electronic mail upon the following:

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bobmorris@westriverlaw.com

By: */s/ Matthew E. Naasz*

Matthew E. Naasz

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

IN THE MATTER OF CLEAN	)	CLEAN NUCLEAR ENERGY
NUCLEAR ENERGY CORP.	)	CORP.'S ANSWERS TO
URANIUM EXPLORATION	)	ELIZABETH LONE EAGLE'S
PERMIT APPLICATION	)	FIRST SET OF DISCOVERY
	)	REQUESTS
EXNI 453	)	

TO: Elizabeth Lone Eagle

Clean Nuclear Energy Corp., by and through undersigned counsel, submit its Answers to First Set of Discovery Requests by Elizabeth Lone Eagle.

GENERAL OBJECTIONS

Clean Nuclear Energy Corp., objects to any discovery request that is not relevant to the specific criteria set forth in SDCL § 45-6D-29. Additionally, Clean Nuclear Energy Corp objects to any discovery request that seeks information disproportionate to the needs of this exploration permit application. The following responses are provided subject to these objections and are provided without waiving the same.

I. DISCOVERY

1. Identify all documents, permits, approvals, and data relied upon to assert the application is "complete" under SDCL S 45-6D-29(1).

ANSWER: See documents available on the South Dakota Department of Agriculture & Natural Resources "Contested Cases" website.

2. State the amount, form, issuer, and effective dates of the surety posted for EXNI 453, and identify the documents evidencing posting and acceptance.

ANSWER: The surety has not yet been posted. Pursuant to SDCL § 45-6D-19, such surety shall be filed or deposited before the issuance of the uranium exploration operation permit.

3. State the total fees paid to the Department for EXNI 453 and identify proof of payment (amount, date, method, receipt or voucher numbers).

ANSWER: The \$500 application fee was provided to DANR on March 15, 2024.

4. Describe in detail all measures taken to identify and mitigate adverse effects of the proposed exploration on historic, archaeological, geologic, scientific, or recreational aspects of affected or surrounding land, and identify all supporting studies.

ANSWER: See, correspondence of February 21, 2025, identifying the studies performed and reports provided by Vantage Point Solutions. Such reports are confidential pursuant to SDCL § 1-20-21.2.

5. Identify each study, report, or assessment relied upon to claim that benefits of the proposed uranium exploration outweigh adverse effects under SDCL § 45-6D-29(3).

ANSWER: There will be no adverse effects on the historic, archeologic, geologic, scientific, or recreational aspects of the surrounding land. The hydrogeologic and mineral resource information received about the uranium deposits located in this area will be a positive effect of the operation. As stated in SDCL § 45-6D-2: “The exploration for and discovery of uranium by means of drilling and other methods of detecting such deposits are important to the economic development of the state and nation.”

6. Describe anticipated impacts of drilling on long-range productivity of watershed lands, public and domestic water wells, aquifer recharge areas, and significant agricultural areas within five miles of the project footprint; identify each supporting study or model.

ANSWER: There are no anticipated impacts on long-range productivity of watershed lands, public and domestic water wells, aquifer recharge areas, and significant agricultural areas within five miles of the project footprint.

7. Identify all hydrologic/hydrogeologic studies, models, baseline data, and monitoring plans addressing aquifer interactions, well impacts, and recharge effects.

ANSWER: Objection. The requested information is outside the scope of the criteria to be considered by the Board of Minerals and Environment pursuant to § SDCL 45-6D-29. Additionally, this request is vague and ambiguous.

8. Identify all threatened or endangered species potentially affected by the proposed operation and describe measures to avoid or minimize adverse effects; identify all biological surveys or consultations relied upon.

ANSWER: See, correspondence from South Dakota Game, Fish and Parks regarding ground-nesting bird surveys, raptor nest surveys and bat roost surveys.

9. State whether Applicant has consulted with USFWS, SD GFP, Tribal wildlife or THPO offices, SHPO, BIA, or any Tribal governments; identify the dates, participants, and outcomes of each consultation and the documents reflecting the same.

ANSWER: See documents on file on the South Dakota State DANR website.

II. REQUESTS FOR PRODUCTION OF DOCUMENTS

1. All documents evidencing posting of surety for EXNI 453 as required by SDCL § 45-6D-29C1).

ANSWER: The surety has not yet been posted. Pursuant to SDCL § 45-6D-19, such surety shall be filed or deposited before the issuance of the uranium exploration operation permit.

2. All records of fee payments for EXNI 453, including invoices, checks, ACH/credit receipts, and agency acknowledgments.

ANSWER: See Application on file with DANR, which is available on their website.

3. All cultural resource, historic, archaeological, geologic, scientific, or recreational resource studies, surveys, assessments, or reviews within the affected or surrounding lands.

ANSWER: See, correspondence of February 21, 2025 identifying the studies performed and reports provided by Vantage Point Solutions. Such reports are confidential pursuant to SDCL § 1-20-21.2.

4. All hydrologic/hydrogeologic studies, groundwater models, well logs, baseline water quality/quantity data, aquifer recharge analyses, and monitoring plans related to the project.

ANSWER: Objection. Such information is not required for a uranium exploration permit pursuant to SDCL ch. 45-6D.

5. All wildlife surveys, biological assessments, or expert reports addressing threatened or endangered species potentially affected by the project.

ANSWER: Objection. Such surveys and assessments are not required pursuant to SDCL § 45-6-29. See, Expert Witness Disclosure of Clean Nuclear Energy Corp., on file herein.

6. All correspondence with USFWS, SD GFP, SHPO/THPO, BIA, or Tribal governments regarding cultural resources, water resources, agriculture, wildlife, or related impacts.

ANSWER: See documents of record on file with the South Dakota Department of Agriculture and Natural Resources.

7. Documentation that Applicant followed protocols and procedures to obtain free, prior, and informed consent from all Tribes party to the 1851 and 1868 Fort Laramie

Treaties for activities affecting unceded treaty territory in the Black Hills, including all notices, meeting records, consent resolutions, and memoranda.

ANSWER: Objection. Not relevant to the criteria articulated in SDCL § 45-6D-29.

8. Documentation evidencing Applicant's understanding and acknowledgement that the State of South Dakota is not a "government agent" as defined by the 1851 and 1868 Fort Laramie Treaties and cannot waive or substitute for required Tribal consent.

ANSWER: Objection. Not relevant to the criteria articulated in SDCL § 45-6D-29.

9. All communications with any Tribal government, THPO, or federal agency (including BIA and USFWS) regarding treaty rights, consent, consultation, or objections related to EXNI 453.

ANSWER: Objection. Not relevant to the criteria articulated in SDCL § 45-6D-29.

10. All internal policies, procedures, or directives used by Applicant concerning treaty territory, consultation, or consent in connection with uranium exploration activities.

ANSWER: Objection. Not relevant to the criteria articulated in SDCL § 45-6D-29.

III. REQUESTS FOR ADMISSION

1. Admit that the application for EXNI 453 does not include a cultural resource survey of the project area conducted to current professional standards.

DENY.

2. Admit that Applicant has not conducted a hydrologic study specifically addressing potential impacts to aquifer recharge areas and domestic wells within five miles of the project area.

DENY that such a study is required by SDCL ch 45-6D.

3. Admit that Applicant has not conducted consultation with affected Tribal governments regarding historic or cultural sites within the project area in connection with EXNI 453.

DENY that such a consultation is required by SDCL ch 45-6D.

4. Admit that Applicant has not conducted a threatened and endangered species survey within the project area to current professional standards.

DENY that such a survey is required by SDCL ch 45-6D.

5. Admit that exploration drilling for EXNI 453 may intersect groundwater within the Inyan Kara or related aquifers.

ADMIT.

6. Admit that Applicant did not obtain the free, prior, and informed consent of Tribes party to the 1851 and 1868 Fort Laramie Treaties before applying for permits affecting unceded treaty territory in the Black Hills.

DENY that such consent is required by SDCL ch 45-6D.

7. Admit that the State of South Dakota is not a government agent as defined by the 1851 and 1868 Fort Laramie Treaties and cannot waive or substitute for Tribal consent.

DENY that such inquiry is required by SDCL ch 45-6D.

Submitted this ____ day of November, 2025.

By: _____
Mike Blady

Notarial Certificate

I, _____, a Notary Public in and for the Province of _____, do hereby certify that on this ____ day of _____, 2025, before me personally appeared Mike Blady, who are personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal.

SEAL

AS TO OBJECTIONS:

GUNDERSON, PALMER, NELSON
IMORE, LLP



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CERTIFICATE OF SERVICE

The undersigned hereby certifies on November 4, 2025, that the original of CLEAN NUCLEAR ENERGY CORP.'S ANSWERS TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS was served electronically, and via U.S. First Class Mail, Postage Prepaid upon the following:

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Email: Brenda.Binegar@state.sd.us
Secretary, Board of Minerals & Environment

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

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By: /s/ Matthew E. Naasz
Matthew E. Naasz

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

IN THE MATTER OF CLEAN	)	CLEAN NUCLEAR ENERGY
NUCLEAR ENERGY CORP.	)	CORP.'S ANSWERS TO LILIAS
URANIUM EXPLORATION	)	JONES JARDING'S
PERMIT APPLICATION	)	INTERROGATORIES
	)	AND REQUESTS FOR
EXNI 453	)	PRODUCTION OF DOCUMENTS

TO: Lilias Jones Jarding

Clean Nuclear Energy Corp., by and through undersigned counsel, submit its Answers to the Interrogatories and Requests for Production by Lilias Jones Jarding.

GENERAL OBJECTIONS

Clean Nuclear Energy Corp., objects to any discovery request that is not relevant to the specific criteria set forth in SDCL § 45-6D-29. Additionally, Clean Nuclear Energy Corp objects to any discovery request that seeks information disproportionate to the needs of this exploration permit application. The following responses are provided subject to these objections and are provided without waiving the same.

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 or who provided information you relied upon in answering these interrogatories or requests for production.

ANSWER: Mike Blady. 503-905 Pender St. W, Vancouver, British Columbia, Canada V6C 1L6. Crystal Hocking, RESPEC Engineering 3824 Jet Drive, Rapid City, SD 57703.

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

ANSWER: Objection. Not relevant to the criteria articulated in SDCL § 45-6D-29. Subject to and without waiving the same, see Clean Nuclear Energy's Expert Witness Disclosure on file herein.

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?

ANSWER: The EXNI application states "drilling will be completed from existing roads and trails to the extent practicable, though overland travel between closely space drill sites would be required." Overland travel will occur within the approved project areas as required by topography and terrain.

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.

ANSWER: Objection. Not relevant to the criteria articulated in SDCL § 45-6D-29. Subject to and without waiving the same, Clean Nuclear Energy Corp. has not identified the water supply to be utilized for the proposed project. It is anticipated that CNEC will utilize municipal or other regional water distribution systems.

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.

ANSWER: Objection. Not relevant to the criteria articulated in SDCL § 45-6D-29. Subject to and without waiving the same, none.

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

ANSWER: Mike Blady. 503-905 Pender St. W, Vancouver, British Columbia, Canada V6C 1L6. Crystal Hocking, RESPEC Engineering 3824 Jet Drive, Rapid City, SD 57703.

REQUEST 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.

ANSWER: Objection. Not relevant to the criteria articulated in SDCL § 45-6D-29. Subject to and without waiving the same, none. Subject to and without waiving the same, this information may be available through the South Dakota Department of Agriculture and Natural Resources.

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.

ANSWER: Objection. Not relevant to the criteria articulated in SDCL § 45-6D-29. Subject to and without waiving the same, none. Subject to and without waiving the same, this information may be available through the South Dakota Department of Agriculture and Natural Resources.

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.

ANSWER: Objection. Not relevant to the criteria articulated in SDCL § 45-6D-29. Subject to and without waiving the same, none. Subject to and without waiving the same, this information may be available through the South Dakota Department of Agriculture and Natural Resources

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

ANSWER: See documents on file on the South Dakota State DANR website.

Submitted this ____ day of November, 2025.

By: _____
Mike Blady

Notarial Certificate

I, _____, a Notary Public in and for the Province of _____, do hereby certify that on this ____ day of _____, 2025, before me personally appeared Mike Blady, who are personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal.

SEAL

AS TO OBJECTIONS:

GUNDERSON, PALMER, NELSON
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Attorneys for Clean Nuclear Energy Corp

CERTIFICATE OF SERVICE

The undersigned hereby certifies on November 4, 2025, that the original of CLEAN NUCLEAR ENERGY CORP.'S ANSWERS TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS BY LILIAS JONES JARDING was served electronically, and via U.S. First Class Mail, Postage Prepaid upon the following:

Brenda Binegar Department of Agriculture
&. Natural Resources 523 East Capitol Avenue Pierre, SD 57501
Email: Brenda.Binegar@state.sd.us
Secretary, Board of Minerals & Environment

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

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bobmorris@westriverlaw.com

By: /s/ Matthew E. Naasz

Matthew E. Naasz

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

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

EXNI 453

**CLEAN NUCLEAR ENERGY
CORP.'S ANSWERS TO THE
BLACK HILLS GROUP OF THE
SIERRA CLUB'S
INTERROGATORIES
AND REQUESTS FOR
PRODUCTION OF DOCUMENTS**

TO: THE BLACK HILLS GROUP OF THE SIERRA CLUB

Clean Nuclear Energy Corp., by and through undersigned counsel, submit its
Answers to the Interrogatories and Requests for Production by the Sierra Club.

GENERAL OBJECTIONS

Clean Nuclear Energy Corp., objects to any discovery request that is not relevant to the specific criteria set forth in SDCL § 45-6D-29. Additionally, Clean Nuclear Energy Corp objects to any discovery request that seeks information disproportionate to the needs of this exploration permit application. The following responses are provided subject to these objections and are provided without waiving the same.

INTERROGATORIES

INTERROGATORY NO. 1 Identify all individuals with knowledge of the planning, permitting, or environmental review of the uranium exploration activities proposed by CNEC in Fall River County, South Dakota, including their current titles, affiliations, and a brief description of their role or involvement.

ANSWER: Mike Blady. 503-905 Pender St. W, Vancouver, British Columbia, Canada
V6C 1L6. Crystal Hocking, RESPEC Engineering 3824 Jet Drive, Rapid City, SD 57703.

INTERROGATORY NO. 2

Describe in detail the methods and procedures CNEC intends to use during exploratory drilling operations, including but not limited to:

- (a) the depth of proposed boreholes; **The maximum depth of the boreholes will be 700 feet.**
- (b) the number and dimensions of drill pads; **As stated in the application, the project will consist of up to 50 drill platforms.**
- (c) the type and quantity of drilling fluids or other substances to be injected or used; **Bentonite and possible cement grout.**
- (d) waste handling, containment, and disposal practices; **A recirculation mud pit will be excavated on each site;** and
- (e) site reclamation plans or procedures to be implemented after drilling is completed. **See Uranium Exploration Reclamation Plan, which accompanied CNEC's application.**

ANSWER: Disturbance for each drill pad was determined based upon the area necessary for the drill pad and associated activities, each approximately 18.3 meter by 18.3 meter per drill pad. The project exploration area, as presented in the EXNI, is a boundary box encompassing all drill holes. *See also, application on file herein.*

INTERROGATORY NO. 3

State whether CNEC has conducted, offered, or relied upon any tribal consultation, tribal outreach, or communication with Native American tribal governments or tribal historic preservation officers (THPOs) regarding the proposed uranium exploration project. If so, identify:

- (a) the tribes or tribal representatives consulted;
- (b) the dates of such consultation; and
- (c) the subject matter and outcomes of those discussions.

ANSWER: Objection. Not relevant to the criteria to be considered pursuant to SDCL § 45-6D-29.

INTERROGATORY NO. 4 Identify all threatened or endangered species that are known to CNEC, or that CNEC reasonably anticipates may be present within or adjacent to the proposed exploration area. For each species identified, state the source of that information, and describe any measures taken or planned by CNEC to assess, avoid, or mitigate potential impacts to those species or their habitat.

ANSWER: See correspondence from South Dakota Game, Fish and Parks on file herein.

INTERROGATORY NO. 5 Describe in detail all measures CNEC plans to take to identify, avoid, mitigate, or remediate potential disturbances to archaeological, historical, or sacred sites- particularly sites of significance to Native American tribes-within or near the proposed exploration area.

ANSWER: See, correspondence from South Dakota State Historical Preservation Office. CNEC will comply with all conditions imposed by the South Dakota Department of Agriculture and Natural Resources and the South Dakota State Historical Preservation Office.

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1 All environmental assessments, studies, or reports prepared by or on behalf of CNEC that relate to the proposed uranium exploration activities near Craven Canyon, including but not limited to groundwater, aquifer recharge areas, erosion, and dust impact.

ANSWER: Objection. The reports contain confidential information regarding the location and character of known archeological sites in South Dakota and is protected by SDCL § 1-20-21.2. Subject to and without waiving the same, see documents on file with the DANR, which are available on their website.

REQUEST FOR PRODUCTION NO.2 All documents, reports, or studies concerning archaeological or cultural resources in the proposed exploration area, including Craven Canyon and adjacent lands.

ANSWER: Objection. The reports contain confidential information regarding the location and character of known archeological sites in South Dakota and is protected by SDCL § 1-20-21.2. Subject to and without waiving the same, see documents on file with the DANR, which are available on their website.

REQUEST FOR PRODUCTION NO.3 All communications with tribal nations or tribal historic preservation officers (THPOs) concerning the proposed exploration area, cultural sites, or sacred lands.

ANSWER: Objection. Such correspondence is not required for a uranium exploration permit pursuant to SDCL ch. 45-6D.

REQUEST FOR PRODUCTION NO.4 All maps, site plans, and drill pad layouts that identify the proposed locations of boreholes, roads, staging areas, or infrastructure associated with exploration.

ANSWER: Objection. The reports contain confidential information regarding the location and character of known archeological sites in South Dakota and is protected by SDCL § 1-20-21.2. Subject to and without waiving the same, see documents on file with the DANR, which are available on their website.

REQUEST FOR PRODUCTION NO.5 All communications with the U.S. Forest Service, DANR, or any other agency regarding potential environmental impacts, required permits, or consultation obligations.

ANSWER: See documents on file with the DANR, which are available on their website.

REQUEST FOR PRODUCTION NO.6 All internal risk assessments, board presentations, or memoranda assessing the potential environmental, cultural, legal, or reputational risks of conducting uranium exploration in or near Craven Canyon.

ANSWER: Objection. Not relevant to the criteria to be considered pursuant to SDCL § 45-6D-29; disproportionate to the needs of this exploration permit application.

REQUEST FOR PRODUCTION NO.7 Any correspondence with insurance carriers or underwriters regarding coverage or risk analysis for the exploration project.

ANSWER: Objection. Not relevant to the criteria to be considered pursuant to SDCL § 45-6D-29; disproportionate to the needs of this exploration permit application.

REQUEST FOR PRODUCTION NO.8 All permit applications filed by CNEC or its affiliates for uranium exploration in South Dakota within the past 10 years, including drafts and supporting documentation.

ANSWER: Objection. Not relevant to the criteria to be considered pursuant to SDCL § 45-6D-29; disproportionate to the needs of this exploration permit application.

REQUEST FOR PRODUCTION NO.9 All documents or communications referencing prior uranium activity or environmental impacts in Fall River County or the immediate vicinity of Craven Canyon.

ANSWER: Objection. Not relevant to the criteria to be considered pursuant to SDCL § 45-6D-29; disproportionate to the needs of this exploration permit application.

REQUEST FOR PRODUCTION NO.10 Any agreements, memoranda of understanding, or indemnity arrangements between CNEC and landowners, government agencies, or contractors related to the proposed project.

ANSWER: None.

Submitted this ____ day of November, 2025.

By: _____
Mike Blady

Notarial Certificate

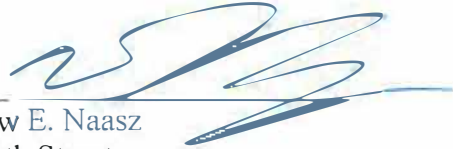
I, _____, a Notary Public in and for the Province of _____, do hereby certify that on this ____ day of _____, 2025, before me personally appeared Mike Blady, who are personally known to me (or proved to me on the basis of satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal.

SEAL

AS TO OBJECTIONS:

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CERTIFICATE OF SERVICE

The undersigned hereby certifies on November 4, 2025, that the original of CLEAN NUCLEAR ENERGY CORP.'S ANSWERS TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS by THE BLACK HILLS GROUP OF THE SIERRA CLUB was served electronically, and via U.S. First Class Mail, Postage Prepaid upon the following:

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By: /s/ Matthew E. Naasz

Matthew E. Naasz