

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

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IN THE MATTER OF CLEAN	)	
NUCLEAR ENERGY CORP.	)	MOTION FOR ORDER AUTHORIZING
URANIUM EXPLORATION PERMIT	)	DISCLOSURE OF PRIVILEGED
APPLICATION	)	INFORMATION
	)	
EXNI 453	)	

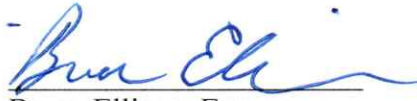
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Pursuant to the March 2, 2026 Protective Order issued by the Hearing Chair and the attached, signed Acknowledgement of the Protective Order, Intervenor-Bruce Ellison, hereby moves the Hearing Chairman for an Order authorizing him to receive an unredacted copy of 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 [by “Clean” Nuclear Energy Corp. (“CNEC”) for a uranium exploration permit], together with all reports prepared by Vantage Point Solutions on behalf of CNEC, as well as reports prepared by the state Archeological Research Center (“ARC”) and the State Historic Preservation Office (“SHPO”).

This Motion is further based upon Intervenor-Ellison’s rights to Due Process in these proceedings, including the right to a copy of all documents prepared in connection with this Application by the Applicant’s contractors, the State Archeological Research Center, and the State Historic Preservation Office.

Dated this 28 day of April, 2026.

Respectfully submitted,



Bruce Ellison, Esq.  
Individual Intervenor  
P.O. Box 2508  
Rapid City, SD 57709

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the original of the Intervenor's Motion(s) was mailed, U.S. Postage paid to:

Brenda Binegar  
Department of Agriculture & Natural Resources  
523 E Capitol Ave Pierre, SD 57501

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:

Steven R. Blair, Deputy Attorney General, Counsel Minerals, Mining, & Superfund Program, PO Box 70 Rapid City, SD 57702

Bob Morris, Hearing Chair, Board of Minerals & Environment, PO Box 370 Belle Fourche, SD 57717

Matthew Nasz, CNEC Counsel, PO Box 8045 Rapid City, SD 57709

Elizabeth Lone Eagle c/o Tatanka Itancan Lone Eagle, 202 Bald Eagle Lane, Box 11, Rapid City, SD 57701

Thomas O'Connor, 4601 Mohawk St Lincoln, NE 68510

Candi Brings Plenty, 725 Saint Charles St Rapid City, SD 57701

Robert Bordeaux, 740 University St #3 Spearfish, SD 57783

Denise Giago, 221 E Jackson St Rapid City, SD 57701

Taylor Gunhammer, 221 E Jackson St Rapid City, SD 57701

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Helen Red Feather, PO Box 173 Wounded Knee, SD 57794

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Darlene Hawk Wing, PO Box 25 Wounded Knee, SD 57794

Beverly Larson, PO Box 82 Wounded Knee, SD 57794

Ruddell Bear Shirt, PO Box 88 Wounded Knee, SD 57794

Mashanaposhe Camp, PO Box 339 Porcupine, SD 57772  
Seth Eagle Bear, Jr., PO Box 44 Wounded Knee, SD 57794  
Sanders Schaller, 322 4<sup>th</sup> St Smithwick, SD 57782  
Sarah Peterson, 510 Jennings Ave Hot Springs, SD 57747  
Julie Plachta, PO Box 635 Hot Springs, SD 57747  
Susan McPhail Pang, 28017 Cascade Rd Hot Springs, SD 57747  
Ben R. Sharp, 28290 W Flagpole Rd Hot Springs, SD 57747  
Jeremiah Davis, 130 E Centennial St Rapid City, SD 57701  
Michelle Tyon, PO Box 1838 Pine Ridge, SD 57770  
Susan Hey, 312 N 40<sup>th</sup> St Rapid City, SD 57702  
Lilias Jones Jarding, PO Box 591 Rapid City, SD 57709  
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Michael Melius, Black Hills Group Sierra Club, PO Box 1624 Rapid City, SD 57709  
Reno L. Red Cloud, PO Box 4052 Pine Ridge, SD 57770  
Kimberly Craven, Attorney General Cheyenne River Sioux Tribe PO Box 590 Eagle  
Butte, SD 57625  
Brenda Gamache, 2337 Wilson Ave Hot Springs, SD 57747  
Gena Parkhurst, 514 Americas Way #20805 Box Elder, SD 57719  
Steven Gunn, Attorney at Law Oglala Sioux Tribe, PO Box 1204 Pine Ridge, SD 57770  
Tonia Stands, 202 Bald Eagle Lane #8 Rapid City, SD 57701

Dated this \_\_\_ day of April, 2026. w

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DEPARTMENT OF AGRICULTURE & NATURAL RESOURCES  
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IN THE MATTER OF CLEAN	)	
NUCLEAR ENERGY CORP.	)	ACKNOWLEDGEMENT OF
URANIUM EXPLORATION PERMIT	)	PROTECTIVE ORDER BY
APPLICATION	)	INTERVENOR BRUCE ELLISON
	)	
EXNI 453	)	

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I, Bruce Ellison, a party to the above-captioned proceedings, acknowledge that I have received a copy of the Protective Order entered by the Hearing Chair in this matter. I have read the terms and conditions of that Order. I agree to abide by the Protective Order and agree not to disclose any protected information except in accordance with the terms of the Protective Order and laws of privileged information.

I declare and affirm under the penalty of perjury that this Acknowledgment has been examined by me and that the statements made and information provided herein are true and correct.

Dated this 28 day of April, 2026.

  
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BRUCE ELLISON