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**Re: Formal Opposition to NuFuels Inc./Laramide Resources Ltd. Churchrock Section 8 Uranium In-Situ Recovery Project — Comments on Community Impact Assessment Scope**

Dear Mr. Diamond:

On behalf of the below signatories, we submit these comments in strong opposition to Laramide Resources Ltd.'s proposed uranium extraction project, through its subsidiary NuFuels Inc., at the Churchrock Section 8 property, approximately seven miles north of Churchrock Village. We urge the New Mexico Environment Department ("NMED") to reject any effort to advance this project without a comprehensive, independent examination of its environmental, public health, cultural, economic, and cumulative impacts, including the devastating and still-unresolved legacy of uranium mining in the surrounding communities.

**Our central objection is simple: There should be no new uranium mining while communities continue to suffer from the contamination, disease, environmental destruction, and economic devastation left behind by the last generation of uranium mining.**

This is not an abstract policy disagreement. It is a matter of environmental justice, intergenerational harm, tribal sovereignty, and the fundamental responsibility of government to prevent foreseeable injury. The communities surrounding Churchrock have already borne a profoundly disproportionate share of the costs of uranium extraction. Their land, water, health, livelihoods, and cultural practices have been sacrificed for industries whose profits departed while their contamination remained.

The human consequences are captured in the words of community member Teracita Keyanna:

“This is a multigenerational impact. It has impacted my grandparents, aunts, uncles, parents, myself and my children... It’s really unfair, because it was something that happened before my generation.”

She goes on to describe the injustice of knowing that her children and grandchildren will inherit the same burdens. Her statement raises the fundamental question NMED must answer: **How can the State justify authorizing another uranium extraction project when it has not adequately protected the families still suffering from the last one?**

**I. New Mexico's Commissioner of Public Lands Has Recognized the Unacceptable Risks of New Uranium Mining**

On September 4, 2026, New Mexico Commissioner of Public Lands Stephanie Garcia Richard signed Executive Order No. 2026-002, *Prohibition on New Uranium Leasing*, directing that there be no new leasing of state trust lands for uranium mining and related purposes.

The Executive Order acknowledges the enormous environmental and financial liabilities associated with uranium extraction, the failure to remediate thousands of contaminated sites, and the billions of dollars in outstanding cleanup needs. It recognizes the history of damage to Indigenous cultural properties and sacred landscapes and expressly cites the catastrophic 1979 Church Rock uranium mill spill, which released approximately 94 million gallons of radioactive material onto surrounding lands and into the Rio Puerco.

The Commissioner also recognized that uranium cleanup has been obstructed by fragmented regulatory jurisdiction, unclear responsibility, litigation, bankruptcies, and insufficient resources. These are not speculative concerns. They are lessons drawn from New Mexico’s lived experience.

Although the Executive Order directly governs new leasing on state trust lands and does not itself decide NuFuels’ permit application, its findings are directly relevant to NMED’s responsibility to protect groundwater and evaluate the consequences of renewed uranium extraction. New Mexico cannot credibly recognize the devastating legacy of uranium mining in one agency while another proceeds as though those harms have no bearing on whether new mining should be permitted.

**II. The Navajo Nation Has Expressly Prohibited Uranium Mining and Processing**

The Navajo Nation has already made its sovereign determination regarding the unacceptable consequences of uranium mining.

In 2005, the Navajo Nation Council enacted the Diné Natural Resources Protection Act, codified in Title 18 of the Navajo Nation Code, §§ 1301–1303. The Act prohibits uranium mining and uranium processing within Navajo Indian Country.

Importantly, the Act expressly includes in-situ leach mining and solution mining within its definition of uranium processing. Thus, the fact that NuFuels proposes in-situ recovery rather

than conventional underground or open-pit mining does not avoid the Navajo Nation's fundamental objection to uranium extraction.

The Act's purpose is to prevent further damage to Navajo culture, society, and the economy until the adverse economic, environmental, and human health effects of past uranium mining and processing have been eliminated or substantially reduced to the Navajo Nation Council's satisfaction.

The Navajo Nation Council expressly recognized the ongoing suffering of former uranium workers and their families, hundreds of abandoned or incompletely remediated uranium sites, contaminated water supplies, and profound economic losses. The Act also incorporates the Fundamental Laws of the Diné, recognizing the responsibility to protect air, water, earth, and the natural world for future generations.

The Navajo Nation's law is attached as **Exhibit A**.

**III. In-Situ Recovery Does Not Eliminate the Threat to Groundwater**

NuFuels' proposal to use in-situ recovery ("ISR") must not be presented as inherently safe merely because it does not require conventional excavation of uranium ore.

ISR involves introducing chemical solutions into uranium-bearing formations, mobilizing uranium and other constituents, and pumping the resulting solution to the surface for processing. The central environmental concern is whether groundwater can be reliably contained, protected, and restored after mining.

NMED must require a rigorous, independently verified assessment of the site's hydrogeology, baseline groundwater quality, groundwater movement, potential contaminant migration, well integrity, operational failures, monitoring capabilities, and long-term restoration feasibility.

In particular, the assessment must examine whether restoration can actually return affected groundwater to applicable standards and pre-mining conditions, what happens if restoration fails, who will be responsible for decades of monitoring, and whether adequate financial assurance will remain available if the operator becomes insolvent or abandons its obligations.

Promises of groundwater restoration are not substitutes for evidence that restoration is technically achievable, financially guaranteed, and enforceable.

**IV. The Community Impact Assessment Must Address Cumulative and Intergenerational Harm**

A meaningful Community Impact Assessment cannot treat Churchrock Section 8 as an isolated industrial proposal on an otherwise undisturbed landscape.

It must account for the cumulative effects of historic uranium extraction, abandoned mines, contaminated groundwater, the 1979 Church Rock spill, existing health burdens, and the continuing social and economic consequences experienced by affected families.

At a minimum, the assessment must evaluate:

- The cumulative effects of historical and proposed uranium operations on groundwater, surface water, air quality, soils, livestock, and traditional food sources.
- The potential for additional exposure to uranium, radium, radon, and other hazardous constituents, including impacts on children, elders, and people with preexisting health vulnerabilities.
- The cultural, spiritual, and psychological consequences of renewed uranium extraction in communities already traumatized by the industry's legacy of cancers, death and destruction.
- The availability, quality, and affordability of safe drinking water, including risks to domestic wells and future water supplies.
- The long-term financial consequences of contamination, groundwater restoration, perpetual monitoring, and potential abandonment.
- The adequacy of tribal consultation and the meaningful participation of affected residents, including Diné-speaking community members.

The assessment must also consider alternatives, including *the no-action alternative*, and whether additional uranium extraction is justified before existing contamination has been adequately addressed.

Most importantly, affected residents must not be relegated to commenting on technical conclusions already reached by consultants retained by the project proponent. Their lived experience, traditional knowledge, and understanding of the region's history must be central to the assessment.

**V. Environmental Justice Requires Prevention, Not Another Promise of Future Cleanup**

For decades, uranium mining companies and government agencies have promised jobs, economic development, environmental safeguards, and eventual reclamation. Yet the communities most directly affected have too often been left with contaminated land, damaged water resources, illness, uncompensated losses, and a cleanup process that remains incomplete generations later.

In 2026, the New Mexico Legislature has already appropriated $20 million in public funds for uranium mine cleanup and reclamation—a stark acknowledgment of the enormous costs that the uranium industry has externalized onto the people of New Mexico. The companies extracted the uranium, collected their profits, and moved on, leaving generations of Indigenous people to bear the contamination, disease, environmental devastation, and financial burden of cleaning up an industry whose profits were privatized while its liabilities were left to the public.

There is a profound inequity in asking those same communities to accept additional risk while the government continues struggling to address the damage already inflicted.

The burden should not fall on families to prove, yet again, that uranium contamination can destroy lives. The burden belongs to the applicant to demonstrate that its proposal will not perpetuate that destruction—and to the government to refuse approval when the evidence is insufficient.

Economic development cannot be measured solely by projected investment, employment, or mineral production. It must also account for the health of communities, the integrity of their water, the preservation of cultural traditions, and the right of future generations to inherit a livable environment.

**VI. Requested Action**

The signatories below respectfully request that NMED ensure the Community Impact Assessment fully addresses the cumulative, historical, intergenerational, cultural, public health, groundwater, and financial risks described above; meaningfully incorporates the Navajo Nation's sovereign prohibition and the testimony of impacted communities; requires independent scientific analysis rather than relying solely on applicant-generated assurances; and considers the no-action alternative.

We further urge NMED to withhold approval of any discharge permit unless and until the applicant demonstrates compliance with every applicable legal requirement and provides reliable evidence that groundwater, public health, and affected communities will be protected. We oppose issuance of a permit for this project.

The people of Churchrock have already paid an unconscionable price for uranium extraction. They should not be asked to mortgage the health of their children and grandchildren to an industry that has yet to repair the damage it inflicted on their parents and grandparents.

**New Mexico has an obligation to break this cycle of nuclear violence—not authorize its continuation. No new uranium mining until the old wounds are healed, the contamination is cleaned up, and the communities that have borne the costs are finally made whole.**

Respectfully submitted,

**Mariel Nanasi**
Executive Director
New Energy Economy

**Attachment:** Exhibit A — Diné Natural Resources Protection Act of 2005, Navajo Nation Council