

Dear EU Commission.

July 2025



concerning the German reporting duties regarding the **EU GDF Law 2011/70/Euratom**

we have to confess the German Geological Disposal Facility Generation 1.0 is as bad as possible.

~~Gorleben — HLW — Geophysical Problem ! — bad plans ! — Empty — STOPPED !!!!!~~

~~Morsleben — MLW LLW is in — Water running in — NO CLOSURE possible !!! > 57.000 L/day ?~~

~~Asse — MLW LLW is in — Water running in — Retrieval not started !!! > 13.000 L/day~~

~~Konrad — MLW LLW — Water running in — Empty — Stopped 2025 !!! > 85.000 L/day~~

it was all : un-deep, therefore wet, no gas-tight closure possible and came without

any proof of eternal undercriticalness under GDF conditions : pressure and heat !!!

Our complete Generation 1.0 GDFs failed completely – PLEASE, do NOT copy that !

BUT - some German and worldwide engineers used these 14 years - since 2011

and developed : **DBHD – Deep Big Hole Disposal – SAFE GDF**

planning with SBR - big size drill tech - by Herrenknecht AG

DBHD 2.0.1 for HLW in deep rocksalt – under 1.100 m Sediment-Overburden

Distribution 5 – 337 m Many Locations possible : Near Beverstedt and Börger

1,3 Bio. EUR per GDF Draft-Plans to scale - for all components - are existing,

„Dr. Herres Cylinder“ Thermodynamic 2D and 3D calculations are fully existing

4 GDFs HLW needed No deep probe drills into deep rocksalt yet undertaken

GDF Container ELB exists, not yet proven and complete

DBHD 2.0.2 MLW LLW Same locations – Draft plans 90 % but not fully complete

0,9 BIO EUR 2x needed No probe drills, but Containers fully existing and packed

1-2

The DBHD GDF plans are so brilliant – that DBHD is likely to become World-Standard.

DBHD GDFs are : deep, dry in rocksalt, come with gastight self closure by mountain-pressure, and prove of eternal undercriticality - because these 1 kg Inventory GDF containers are so small - that no critical mass fits in.

Please see : ing-goebel.com for further information with the original planning data.

We apologise for the fact that our BMUKN offers you a National-Disposal-Program that tells you lies about Konrad, and has put sand in your eyes concerning Stand AG. These people are liewyers – they do not have any idea what happens in GDF Sector.

Please give a warning to all other EU countries NOT to make all these German Generation 1.0 mistakes in their countries – causing pollution and costs – we have payed 13 Bio. EUR already to be able to send you this warning. Take it very serious please.

EU should target and negotiate with Kazakhstan concering DBHD GDFs in the Pri-Caspian Basin – that is an empty desert with big salt dome geologies under good Sediment Overburden. – Western Technology GDFs meet the required geologies.

It is required that you review EU law 2011/70/Euratom – taking in account, that Generation 1.0 DID NOT WORK – and – the new drill tech SBR offers GDF a state of technology that is required for **SAFE** Geological Disposal Facilities.

With best regards from Germany to Brussels and Strasbourg

Volker Goebel - and the Geologists, Physicists, Engineers ww

Dipl. - Ing. Architecture – Master of Metal Industry

GDF Planners ww for 14 years

