Incoming
M/037/0006

Mike Bradley <mbradley@utah.gov>

RE: Interim Management Plan for Rim Columbus Mine UTU-68061

1 message

Andrea Reither <AReither@energyfuels.com> Wed, May 21, 2014 at 3:03 PM
To: "McDougall, Ted" <tmcdouga@blm.gov>
Cc: Mike Bradley <mbradley@utah.gov>, Paul Baker <paulbaker@utah.gov>, "Frank Filas, P.E" <FFilas@energyfuels.com>, Jaime Massey <JMassey@energyfuels.com>

Ted,

Attached please find *Revision 2* of Energy Fuels Resources (USA) Inc.'s (Energy Fuels) Interim Management Plan for the Rim Columbus Mine located in San Juan County, Utah. A typographical error on the title page was rectified. Please let me know if you would like me to send a printed copy of the transmittal letter and the new cover page.

Thanks,

Andrea

Energy Fuels Resources (USA) Inc.

Andrea Reither

Environmental Permitting Specialist

t: 303-389-4133

225 Union Blvd., Suite 600

Lakewood, CO, US, 80228

http://www.energyfuels.com

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From: Andrea Reither

Sent: Tuesday, March 18, 2014 10:20 AM
To: McDougall, Ted
Cc: Mike Bradley; 'Paul Baker'; Frank Filas; Jaime Massey; David Turk; Race Fisher
Subject: RE: Interim Management Plan for Rim Columbus Mine UTU-68061

Ted,

Attached please find *Revision 1* of Energy Fuels Resources (USA) Inc.'s (Energy Fuels) Interim Management Plan for the Rim Columbus Mine located in San Juan County, Utah. Minor modifications were made to the introductory section as you requested. I will send you a printed copy this week.

Please contact me at 303-389-4133 or areither@energyfuels.com if you have any questions or need additional information.

Thanks,

Andrea

From: Andrea Reither
Sent: Monday, March 10, 2014 8:19 AM
To: McDougall, Ted
Cc: Mike Bradley; 'Paul Baker'; Frank Filas; Jaime Massey; David Turk; Race Fisher
Subject: Interim Management Plan for Rim Columbus Mine UTU-68061

Ted,

Attached please find Energy Fuels' Interim Management Plan for the Rim Columbus Mine located in San Juan County, Utah. Due to the current market price of uranium, Energy Fuels has suspended operations at the mine until market conditions become more favorable. In the meantime, the Rim Columbus Mine facilities will be maintained in a safe and environmentally acceptable condition in accordance with 43 CFR Part 3809.401 and this plan.

Please contact me at 303-389-4133 or areither@energyfuels.com if you have any questions or need additional information.

Thanks,

Andrea

2 attachments

Rim Interim Management Plan_2014-05_rev2.pdf
251K

TL_Rim Interim Management Plan_2014-05_rev2.pdf
39K

Energy Fuels Resources (USA) Inc.
225 Union Blvd. Suite 600
Lakewood, CO, US, 80228
303-974-2140
www.energyfuels.com

May 21, 2014

Mr. Ted McDougall
Bureau of Land Management
Monticello Field Office
365 North Main Street
Monticello, Utah 84535

RE: *Revised* Interim Management Plan for Rim Columbus Mine UTU-68061

Dear Ted:

Attached please find *Revision 2* of Energy Fuels Resources (USA) Inc.'s (Energy Fuels) Interim Management Plan for the Rim Columbus Mine located in San Juan County, Utah. A typographical error on the title page was rectified.

Due to the current market price of uranium, Energy Fuels has suspended operations at the mine until market conditions become more favorable. In the meantime, the Rim Columbus Mine facilities will be maintained in a safe and environmentally acceptable condition in accordance with 43 CFR Part 3809.401 and this Plan.

Please contact me at 303-389-4133 or areither@energyfuels.com if you have any questions or need additional information.

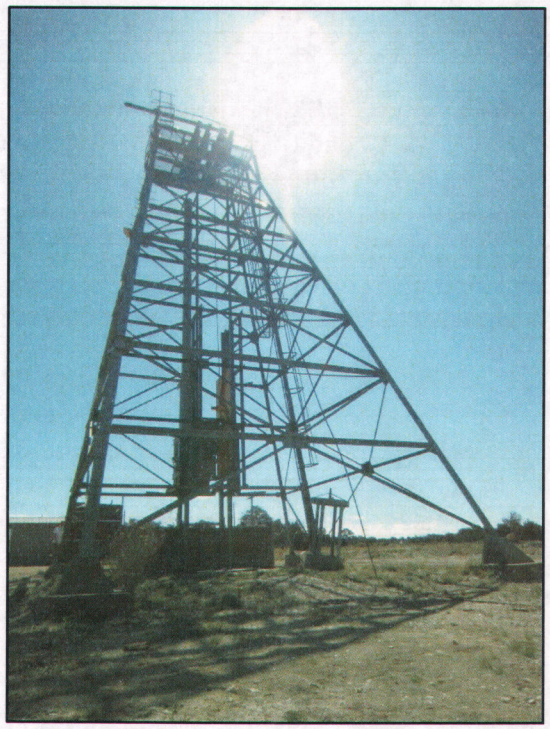
Sincerely,

Andrea Reither

Andrea Reither
Environmental Permitting Specialist

cc: Paul Baker (UDOGM), F. Filas, J. Massey, D. Turk, R. Fisher (Energy Fuels)

RIM COLUMBUS MINE (UTU68061)
INTERIM MANAGEMENT PLAN
ENERGY FUELS RESOURCES (USA) INC.
SAN JUAN COUNTY, UTAH



Prepared By:

ENERGY FUELS RESOURCES (USA) INC.

225 Union Boulevard, Suite 600
Lakewood, Colorado 80228

May 2014

1.0 INTRODUCTION

The mineral commodity markets tend to be cyclical, that is, prices rise and fall substantially over periods of years. In the uranium market for example, high prices in the late 1970s gave way to very low prices in the early 1990s, with spot prices falling below the cost of production for most mines. In 1996 spot prices recovered to the point that many mines could produce profitably, though prices soon declined again and only started to recover strongly late in 2003. In the past, these market fluctuations have led to a series of temporary suspensions followed by re-opening of mines when uranium prices increased.

Interim management of the mines protects BLM lands from undue degradation during periods of non-operation. In the event that market conditions or other circumstances require a temporary suspension of mine operations at the Rim Columbus Mine, Energy Fuels Resources (USA) Inc. (Energy Fuels) will provide notice to the BLM. During non-operating periods, Energy Fuels will maintain the buildings, drainage structures, roads, and other surface facilities in a safe and environmentally acceptable condition. Underground openings, gates, and buildings will be locked to discourage unauthorized access when Energy Fuels mine personnel are not present.

The Rim Columbus Mine Plan of Operations was approved prior to January 20, 2001 so it is not necessary for this mine to comply with 43 CFR Part 3809.401, Section (b)5 which requires an interim management plan. However, in order to be consistent with other Energy Fuels projects under BLM jurisdiction, we have elected to voluntarily prepare and comply with the interim management plan requirement. In the event of temporary suspension of operations, in order to prevent unnecessary or undue degradation, the following plan will be followed by Energy Fuels.

2.0 MEASURES TO STABILIZE EXCAVATION AND WORKINGS

The underground workings will be stabilized in accordance with Mine Safety and Health Administration (MSHA) regulations. Roof bolts, mats, wire mesh, cribbing and other types of support will be installed, as needed, to stabilize the back and ribs. Equipment will be removed from immediate working faces and from lower areas of the mine where water may collect. Mine portals and adits will be gated and locked or backfilled during periods of non-operation. Vent holes will have metal diffusers and metal grates to prevent access to them. These diffusers and grates will remain in place during periods of non-operation. The mine is an underground mine; therefore, no trenches or pits are excavated during mining operations, and stabilization is not required.

Exploration drill holes are typically closed following exploration drilling and it is unlikely that drill holes would remain open for longer than 30 days. In the event that exploration drilling holes are open during a period of non-operation, the holes will be abandoned in accordance with Rule 647-4-108 of the Utah Administrative Code (UAC) and BLM best management practices.

The surface area will be maintained in accordance with the mine's Stormwater Pollution Prevention Plan (SWPPP). Areas exhibiting erosion will be repaired and runoff will be monitored periodically in accordance with the approved Plan of Operations and SWPPP. Ditches, culverts and other surface drainage features will be inspected quarterly and cleaned out as needed. Energy Fuels Field Personnel will inspect the fencing around the mine area on a

periodic basis during temporary suspension to verify that they are in good repair and that there has not been any vandalism at the mine. Signage related to public health and safety will remain in place.

3.0 MEASURES TO ISOLATE OR CONTROL TOXIC OR DELETERIOUS MATERIALS

Potentially toxic materials on site during routine operations may include diesel fuel, gasoline, oil products (i.e., motor oil, hydraulic oil, gear oil, and used oil), starting fluid, and antifreeze. These materials will be stored and used on site in accordance with the provisions of the mine's Spill Prevention, Control, and Countermeasures Plan (the "SPCC Plan"). In the event of temporary suspension of mining activities, any unnecessary fuel and deleterious materials will be removed from the site and either used, recycled, or disposed of in accordance with state and federal regulations. Fuel tanks that have been emptied will typically remain on site within their secondary containment and be marked as empty. Stormwater runoff from the waste rock pile may also be deleterious and is controlled in accordance with the SWPPP. Runoff from the site drains to existing retention ponds that were designed to prevent discharge from up to a 100-year storm event.

4.0 PROVISIONS FOR THE STORAGE OR REMOVAL OF EQUIPMENTS, SUPPLIES AND STRUCTURES

Equipment and supplies at the mine will be removed from site, or will be placed into locked storage buildings. No equipment or supplies will remain outside of mine buildings or outside of the workings. The locks and buildings will be monitored periodically to ensure that vandalism has not occurred.

5.0 MEASURES TO MAINTAIN THE PROJECT AREA IN A SAFE AND CLEAN CONDITION

The site will be kept clean and free of litter and debris. Trash, used tires, old equipment parts, empty barrels, and other miscellaneous materials will be removed from the site and either recycled or disposed of properly. Site safety will be maintained by discouraging unauthorized access through the use of locked gates, fences, warning signs, and security personnel, if necessary. Signage for speed limits and access limitations will remain in place.

During periods of temporary suspension, equipment and materials will either be removed from the site, or placed and locked inside buildings. The ore will be removed from the surface and transported to the White Mesa Mill in Blanding, Utah. Surface areas, including but not limited to, the waste rock stockpiles, structural stormwater controls, and earthen berms will be repaired prior to suspension and maintained, as needed, during the suspension period. The mine office and shop will be locked and monitored periodically.

6.0 PLANS FOR MONITORING SITE CONDITIONS DURING PERIODS OF NON-OPERATION

As detailed above, this Plan meets the requirements of 43 CFR 3809.401(b)(5)(v) to establish a plan for monitoring the mine during periods of non-operation.

During periods of non-operation, Energy Fuels will maintain mine facilities in a safe and environmentally acceptable condition. The mine facilities area, buildings, portals, adits, vent holes, roads, sediment controls, and surrounding fencing will be monitored on a periodic basis. Maintenance of facilities, stabilization structures, and controls will occur at the mine, as needed, following monitoring activities. In addition, the mine's permits will be maintained during suspension and Energy Fuels will continue to maintain compliance with the permit requirements.

7.0 SCHEDULE OF TEMPORARY CLOSURE

Due to market conditions, the Rim Columbus Mine stopped producing ore in the fall of 2009. Dewatering operations continued, including venting and underground access for pump maintenance, until February 8, 2013 when the vents were closed and the portal was locked. Mining is expected to recommence when market conditions are more favorable. During this non-operating period, Energy Fuels will maintain the buildings, drainage structures, evaporation pond, roads, and other surface facilities in a safe and environmentally acceptable condition in accordance with this Plan.

8.0 CONTACT DURING TEMPORARY CLOSURE

During this period of temporary closure, the following contact information should be used:

Race Fisher
Mine Superintendent
Office phone: (970) 677-2702
Cell phone: (970) 739-5742
RFisher@energyfuels.com
9244 W. Hwy 141
Egnar, CO 81325

David Turk
Manager Environmental Health and Safety
Office phone: (435) 678-2221 x113
Cell phone: (435) 459-9786
DTurk@energyfuels.com
6425 S. Highway 191
Blanding, UT 84511

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