M/037/0026
cc: Tom
Rec'd by email
Task: 3773
9/9/10

Uranium Watch

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September 9, 2010

Mr. Paul Baker
Minerals Program Manager
Division of Oil, Gas & Mining
P.O. Box 145801
Salt Lake City, Utah 84114-5801
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Re: Denison Mines (USA) Corporation La Sal Mine Complex Plan of Operations Amendment (M/037/012 and M/037/026), as supplemented

Dear Mr. Baker:

Denison Mines (USA) Corporation (Denison) submitted the La Sal Mine Complex Plan of Operations Amendment (M/037/012 and M/037/026), dated December 11, 2009, and La/Sal/Snowball/Beaver Shaft (M/037/026) and Pandora (M/037/012) update and amendment Notice of Intent for Large Mining Operations, dated January 26, 2010, to the Division of Oil, Gas & Mining (DOGM). Denison submitted various maps with the Plan of Operations Amendment and Notice of Intent. These maps include Figure 1-2, La Sal Mines Complex Site (December 2009 submittal), and Figure 2, Vent Holes and Surface Facilities Map (July 28, 2010; January 2010 submittal). Figure 1-2 has the old vent shaft names and Figure 2 shows the new vent names/numbers and includes the La Sal Vent Naming Table, which supposedly shows the old vent shaft identification names and the new names.

Below are concerns regarding the accuracy and completeness of information on those maps and the La Sal Vent Naming Table.

1. Figure 2 Map

Figure 2 (Vent Holes and Surface Facilities Map) is included in the 2010 La/Sal/Snowball/Beaver Shaft (M/037/026) and Pandora (M/037/012) update and amendment Notice of Intent for Large Mining Operations. The updated Plan of Operations Amendment (POA) includes a Notice of Intention to Commence Large Mining Operations (NOI) (Form MR-LMO). Page 5 of the NOI includes a Base Map

Check List. The Base Map Checklist, at (d), states, "Known areas which have been previously impacted by mining or exploration activities within the proposed land affected." Denison responded to "(d)," by stating: "Figure 2 shows previously impacted or disturbed areas. Figure 3 shows proposed area to be disturbed."

A. The Base Map Check List, at (d), requires that there be a map that shows known areas that have been previously impacted by both mining and exploration activities. The Figure 2 map does not meet that requirement, because the areas that have been previously impacted by exploration activities and all mining activities are not shown on the Figure 2 map. Exploration activities that took place on Bureau of Land Management (BLM) and U.S. Forest Service (USFS) lands in 2008, and as recently as the fall of 2009 on BLM land, are not shown on the map. The area in the vicinity of Denison's uranium mines in La Sal is a maze of bulldozed strips of land (in various stages of reclamation) that resulted from exploration activities over the decades. The extensive presence of these impacted areas is clearly evident on the ground and from aerial views.[1]

Also, there is no indication on the map of the disturbance from the electrical transmission lines associated with the mine vents, which would not be there if not for the mines.

For some reason Denison did not include all areas that have been previously impacted by mining and exploration activities in their map, as required. Thus far, DOGM has not requested this information.

Surely, it is DOGM's responsibility to assure that the NOI is complete and accurate in all respects. Therefore, please explain to me why Denison should not be required to submit a map that clearly shows the extent of disturbances from all recent and previous exploration activities and disturbances associated with the vent-hole transmission lines and electrical infrastructure.

B. Figure 2 does not clearly show the roads and trails that are associated with the La Sal Mines Complex mining and exploration activities that Denison would eventually reclaim.

C. Vent 4014-6-29-25 (Vent 3-09 on Figure 1-2 map (now known as the Pandora #12 vent) is the newest Pandora mine vent, installed on BLM land in December 2009. The road to the vent is incorrectly located on Figure 2 and other base maps submitted as part of the POA and NOI. The road does not come down from the north. The road winds through the area were exploration drilling was conducted on BLM land in 2008 and 2009. The existing road to that exploration area and the road constructed through the exploration area to the Pandora #12 are not shown on Figure 2 and other base maps.

D. Figure 2 and other base maps show "Existing Roads" and "Existing Trails." Some of the so-called "Existing Trails" are USFS roads that have USFS road numbers and are

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[1] Aerial map of La Sal area, as of 2006:
http://tlamap.trustlands.utah.gov/plat/help/Quickreference.pdf

shown as USFS roads on USFS maps. Many of these "Existing Trails" are quite passable by car; some "Existing Trails" would need a 4-wheel drive with a high clearance to drive on. Most, if not all, are not "trails"—they are roads.

E. Figure 2 has a Note, which states: "Roads in Section 5 (USFS) will be closed to public access." Which roads in Section 5 is Denison Mines referring to? Who will close those roads to public access?

F. The Pandora Vent #4 has been reclaimed, however that is not shown on the Figure 2 map.

2. Figure 1-2

A. The Figure 1-2 map has the locations of the Snowball #2 (3000 #3-36-28-24) and Unnamed Vent (4100 #1-31-28-25) switched around.

B. The Snowball #1 vent should be the Pandora #1, as written on the side of the vent.

C. The map shows Snowball #4, a vent that has been reclaimed, but appears as an active vent on the map. There are two vents in that location that have been reclaimed.

D. Apparently Snowball #6 has been reclaimed, but appears as an active vent on the map. The Figure 2 map shows it as a reclaimed vent.

2. La Sal Vent Naming Table

A. Unnamed 7' Vent (3000 #1-1-29-24) is the Pandora #7 vent.

B. Snowball #5 vent (3000 #2-1-29-24) is the Pandora #5 vent.

C. Unnamed 7' Vent (4100 #2-6-29-25) is Pandora #8 (VH #8).

D. Unnamed Vent 40" Vent Pandora #5 (500 #2-6-29-25) is actually the Pandora #2 vent

E. Pine Ridge/Pandora #9 has a question mark (?) after #9. This is the Pandora #9 vent (as written on the side of the vent), so no need for the question mark.

Sincerely,

Sarah M. Fields
Program Director