

**Roca Honda Resources Response to Agency 02-28-2013 Comments
of Roca Honda Project Mine Operations Plan, Revision 1 Responses, (Sep 20, 2012)
MK025RN**

May 15, 2013

Agency Review of Roca Honda Uranium Mine Operations Plan, Revision 1			
Reviewer: David L. Clark		Review Date: February 28, 2013	
Agency: NM MMD			
Item #	Section/Page (or general)	Topic	Comment
1.	Response to previous comments	Location of met and air quality stations	19.10.6.602.D.15.c Reviewing the RHR response to MMD's July 5, 2012 Comment #3, requesting mapping of the meteorological and air monitoring stations, MMD found no changes in Page 48, other than the date at the bottom of the page, which was changed from January 2012 to September 2012. The rule requires mapping the locations of facilities and structures. Please add these facilities to Figure 1-3 and Figures 4-1, 4-2 and 4-3, as appropriate.
	RHR Response		RHR apologizes that the submitted CD did not include the correct replacements for pages 39, 40, 41, 42 and 48. The hard copy replacement pages submitted with the response package were correct. RHR will deliver a corrected CD for the Mine Operations Plan with the previous corrections and the ones with this submittal. A revised Figure 1-3 which includes additional labeling to describe the three possible discharge points for the treated reuse water.
2.	Response to previous comments	Figure number corrections	19.10.6.602.D.15.c Figures on pages 39, 40 and 41 should be labeled 4-1, 4-2 and 4-3, not 0-1, 0-2 and 0-3.
	RHR Response		The figure numbers on the hard copy replacement pages were correct, as stated in response to comment number 1 above, the CD pages were incorrect. A corrected CD is submitted with this response package.

Agency Review of Roca Honda Uranium Mine Operations Plan, Revision 1

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3.	Section 5.2.1, Page 63	Mud Pits/Drill Pits	<p>19.10.6.603.B <i>"The mud consists of drill cuttings and water and will be dried prior to being stockpiled. Drying will be accomplished by removing the mud to a second pit (or area) and allowing the water to evaporate. The dried material will then be removed and placed in a designated stockpile. These pits will be reclaimed as soon as the shafts are completed and the material is dry."</i></p> <p>A design for the described mud pits is not shown on the MOP. A diagram with a typical configuration for the dewatering well pits – including mud pits should be presented in the plan. Further description of locations of materials excavated to create the pits, specific proposed final stockpile locations for the dried drill cuttings and reclamation methods need to be better explained.</p> <p>A typical drill pad layout for the vent shafts is shown on Sheet 13 of the MOP drawing package. The drill pads vary slightly in total area because of available space. Each drill pad will be cleared and grubbed with the topdressing segregated and hauled to the main stockpile for storage until reclamation. The pad also includes the shaft, space for the fan, mid pits and the stockpile for excavated material to construct the mud pits. The excavated material and cuttings from the mud pits will be removed with a backhoe and loaded into a sealed container. The container will be hauled to the shaft excavation stockpile and mixed with the production shaft material.</p> <p>A typical design for a dewatering well drill pad has been added to the MOP as Figure 5-1 on page 63a and is attached as a replacement page. The pad will be cleared and grubbed with the topdressing segregated and hauled to the main stockpile until reclamation. The mud pit construction material will be stored on site. The drill cuttings will be removed from the mud pit and stockpiled on the pad. As the wells are completed the pad area will be reclaimed. Any excess material will be hauled to the shaft material stockpile.</p>
	RHR Response		

Agency Review of Roca Honda Uranium Mine Operations Plan, Revision 1

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4.	Table 3-1, Page 16	Schedule for mine	19.10.6.603.B Please report the times from permit approval in years and months format.
	RHR Response		The schedule in Table 3-1 was prepared in days because the permit approval date is unknown. We will assume an approval date and schedule the activities in months and years. Table 3-1 now includes both formats and replacement pages 15 and 16 are attached for insertion in the MOP.
5.	Response to previous comments	Ephemeral water samples	19.10.6.603.C.4.c A commitment to attempt to collect water samples from ephemeral upslope streams has been in the MOP since October 2009. Has RHR collected any such samples to date? If so, the Baseline Data Report should be updated. If not, why not?
	RHR Response		RHR has made attempts to collect water samples from the ephemeral upslope arroyos. We have also tried collection bottles in the bottoms of the arroyos but they have been unsuccessful, such is the nature of surface water in the arid southwest. RHR expects that there will be ample opportunity between approval of the permit and commencement of operations to sample when staff is available onsite on a regular basis to physically grab water from active flow during rain events.
6.	Response to previous comments	Bridge Spring wetland	19.10.6.603.C.8 The RHR groundwater flow model projects that there may be drawdown at Bridge Spring, which supports a wetland according to the Baseline Data Report. Please propose a plan that would mitigate adverse effects to this wetland area during reclamation.
	RHR Response		When the mine is operational and staff is available RHR will monitor the Bridge Spring for unusual conditions and discuss a plan with the agencies at that time.

Agency Review of Roca Honda Uranium Mine Operations Plan, Revision 1

Reviewer: Matthew Wunder		Review Date: December 19, 2012	
Agency: NMDGF			
Item #	Section/Page	Topic	Comment
7.	Response to previous comments	Area impoundments and mitigation options	It is the responsibility of the applicant to inventory the tanks, ponds or impoundments that will be present during operations, the potential physical and/or chemical hazards to terrestrial and flying wildlife, and to identify methods by which those hazards will be mitigated for each feature. The Department is available for consultation regarding specific mitigation options.
	RHR Response		RHR will inventory the tanks, ponds or impoundments and their potential hazards to wildlife and work with the Department on the need for a mitigation strategy during construction.
8.	Appendix 8-D	Bridge Spring wetland	The Riparian Assessment Report (SWCA Environment Consultants, Nov 2011) attached to the revised Mine Operations Plan as Appendix 8-D, identifies Bridge Spring as a spring-fed wetland. If the potential maximum 18 feet drawdown (Assessment of Potential Groundwater Level Changes from Dewatering at the Proposed Roca Honda Mine, Intera, Inc., revised March 8, 2012) occurs as a result of mining, this feature is likely to be altered or eliminated. Although Bridge Spring is on private land, and is not within the proposed permit area, Mining and Minerals Division should evaluate whether it falls under the NMAC 19.10.6.603 C(8) requirement that "(d)isturbance to riparian and wetland areas shall be minimized" and (a)verse effects...shall be mitigated during reclamation.
	RHR Response		See response to Comment #6 above.

Agency Review of Roca Honda Uranium Mine Operations Plan Revision 1

Reviewer: Kurt Vollbrecht and Neal Schaeffer		Review Date: December 21, 2012	
Agency: NMED			
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9.	Response to previous comments	NOI for irrigation system	NMED requires submittal of a Notice of Intent (“NOI”) for this discharge, including details of the proposed irrigation system, for the agency’s evaluation.
	RHR Response		RHR has met with NMED on this matter and has agreed to submit a Notice of Intent on behalf of RHR, and on the basis that a discharge plan will not be required. RHR has provided NMED with an irrigation design package to demonstrate the feasibility of irrigation 365 days a year.
10.	Response to previous comments	Septic tank solids disposal	RHR’s response does not address NMED’s comment: “No plan for sampling and handling of accumulated solids in the septic tanks is provided” was not addressed in RHR’s response. NMED requires such planning to ensure that contaminant concentrations – in the accumulated septic solids will not result in contaminant concentration at the POTW that can impact the environment.
	RHR Response		The City of Grants municipal wastewater treatment plant (WWTP) operator was contacted for their acceptance criteria and treatment methods for septage. The WWTP acceptance criteria for septage is that it must be brought to the WWTP under a City permit to pickup and haul the septage. Two pumper truck companies in Grants are permitted to haul and dump the septage at the WWTP. RHR would contract with one of these companies. The septage enters the WWTP with the other wastewater and is treated in aerated lagoons and then settling lagoons. The generated solids settle and remain in the lagoons. The solids have been in the lagoons for 23 years. The effluent flows to the golf course ponds for use on the course and evaporation. Once the mine is operational RHR will grab a sample of the septage and have it analyzed for uranium, radium and gross alpha concentration. Further discussions can be held depending on the results. We have revised page 47 in Section 4.0 to reflect the disposal of septage.
11.	Comments on previous RHR responses	Irrigation system details	NMED presumes that RHR intended to reference its response to comment no. 16. As stated in NMED’s above comment to that response, NMED will require the details of the proposed discharge, including the irrigation system, in an NOI for the agency’s evaluation.
	RHR Response		RHR agrees that the response reference should be Comment no. 16 rather than 13. The NOI response is in Comment no.9 above.

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12.	Comments on previous RHR responses	Bridge Spring wetland	<p>According to the application materials and related documents, the proposed Roca Honda dewatering may impact springs and wetlands, specifically through drying up these surface water resources. These impacts should be identified and mitigated.</p> <p>According to the "Assessment of Potential Groundwater Level Changes from Dewatering at the Proposed Roca Honda Mine", Nov 4, 2011, Revised August 7, 2012, page 120: The water level declines that will occur from maximum pumping of existing water rights will greatly exceed impacts from proposed RHR dewatering. The RHR model predicts that maximum pumping of all water rights in the vicinity of the permit area together with RHR mine dewatering (Scenario 4) will result in groundwater level drawdown of 10 feet or greater for Crownpoint and the City of Gallup water wells 40 years after the end of mining, but not the groundwater levels near the Acoma and Laguna Pueblos. Bridge Spring is predicted to have a water level decrease of 34 feet. It is further stated in Section 5.1.2 that the maximum drawdown expected at Bridge Spring is 8.8 inches (Scenario 2).</p> <p>According to the Baseline Data Report, Section 8.0 Surface Water, January 2011, Revision 1, Section 3.7 of Appendix 8-D indicates that Bridge Spring is a wetland.</p> <p>According to Section 19.10.6.603.C(8) NMAC: "Disturbance to riparian and wetland areas shall be minimized during mining. Adverse effects to riparian and wetland areas shall be mitigated during reclamation unless the mitigation conflicts with the approved post-mining land use."</p> <p>The statements in the groundwater level assessment are not well explained and the potential for dewatering of the wetland associated with Bridge Spring is not discussed. Dewatering a wetland effectively destroys that wetland, and should be considered an "adverse effect". The Mining Act requires minimization and mitigation of these effects. NMED requests that MMD require a discussion of the potential for impacts to Bridge Spring, documentation of any impacts that may occur that are unavoidable and that any remaining impacts are minimized. NMED also requests that MMD require a mitigation plan to address any remaining impacts, after these avoidance and minimization measures.</p> <p>See the response to Comment no. 6 above.</p>
	RHR Response		