

State of New Mexico  
Energy, Minerals and Natural Resources Department

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Michelle Lujan Grisham  
Governor

Sarah Cottrell Propst  
Cabinet Secretary

Todd E. Leahy, JD, PhD  
Deputy Cabinet Secretary

Mike Tompson, Interim- Director  
Mining and Minerals Division



November 4, 2019

Mr. Michael Neumann, Sr. Project Consultant  
Energy Fuels Resources, Inc.  
225 Union Blvd., Suite 600  
Lakewood, CO 80228

RE: Agency Comments, Roca Honda Mine - Baseline Data Report Revision 1 – Portfolio 2 to Addendum 1 Permit Application No. MK025RN, dated September 2019

Dear Mr. Neumann:

The Mining and Minerals Division (“MMD”) has reviewed the Roca Honda Resources (“RHR”) Baseline Data Report Revision 1 – Portfolio 2 to Addendum 1 Permit Application No. MK025RN, dated September 2019. MMD has additional comments on the September 2019 response to comments. Please address the questions and concerns regarding the following documents below:

**Cover Letter: RE: Agency Comments on Baseline Data Report Addendum 1, Roca Honda Mine, Permit Application No. MK025RN**

- No Comments

**Attachment A Figure 8-2A, Surface Water Resources**

- No Comments

**Attachment B Figure 10-1A, Prior Mining Operations BDR Replacement Pages**

BDR Section 12.0 Present and Historic Land Use, September 2019 Revision 2

- Section 12.1 Introduction: Please provide a more detailed description of Sections 8 and 17.
- Section 12.2 Present and Historic Land Use of the Permit Area: Provide mention of Section 8 in the section.
- Section 12.3 General Patterns of Land Use Surrounding the Permit Area: Correct statement regarding Rio Grande Resources Corp. being on Stand-By Status. RGR is operational and came off Stand-By Status on December 29, 2017.

- Section 12.4 Land Capability and Productivity: Provide discussion of Sections 8 and 17.

**Attachment C Response to NMED MECS 5/1/19 Comments**

- No Comments

If you have any questions, please contact me at (505) 476-3413 or at [clinton.chisler@state.nm.us](mailto:clinton.chisler@state.nm.us).

Sincerely,



Clint Chisler  
Permit Lead  
Mining Act Reclamation Program ("MARF")

cc: Jeff Lewellin, MECS  
Alan Klatt, SWQB  
Ashlyn Winton, GWQB  
Holland Shepherd, MARP  
Mine File (MK025RN)