

State of New Mexico  
Energy, Minerals and Natural Resources Department

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**Michelle Lujan Grisham**  
Governor

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Cabinet Secretary

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Deputy Cabinet Secretary

**Jerry Schoeppner - Director**  
Mining and Minerals Division



March 10, 2020

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

RE: Baseline Data Report for proposed Roca Honda Mine, Permit No. MK025RN

Dear Mr. Neumann:

Per §19.10.6.602 D (13) NMAC, the New Mexico Mining and Minerals Division (“MMD”) has reviewed the Roca Honda Resources (“RHR”) Baseline Data Report (“BDR”) submissions as part of the Permit Application Package (“PAP”) for the proposed Roca Honda Mine, Permit No. MK025RN. Below is a summary of the documents related to the BDR.

- Roca Honda Resources, LLC, Baseline Data Report for the Roca Honda Mine, Revision 1, January 2011
- Southern Discharge Pipeline Proposal, Rio San Jose Workplan: EF to NMED Mayerson DP-1717: Southern Pipeline Alt., August 5, 2014
- NMED Comments on RSJ Workplan, September 10, 2014
- RHR Response to Comment RSJ Workplan, October 8, 2014
- NMED Comments to EF Comments RSJ Workplan, October 15, 2014
- RHR Responses to NMED, October 28, 2014
- Southern Pipeline Alternative handout description to consulting parties, November 1, 2014
- RSJ Characterization Work Plan Rev. 1; cc to D. Clark, April 23, 2015
- Interim Report of Findings Rio San Jose Characterization, September 14, 2015
- Proposed RH Mine Dewatering Discharge Plan; submitted to USFS w/cc to MMD, October 17, 2017
- Alternative 4 with Section 17 Addition – Revised Mine Plan Summary for Supplemental EIS, February 27, 2018
- Roca Honda Mine Baseline Data Report Addendum 1, July 24, 2018
  - BDR Addendum 1 – Appendix A-1 Biological Survey, Proposed Section 17 Expansion Area, July 24, 2018
  - BDR Addendum 1 – Appendix A-2 Addendum to 2014 Biology Report, 2015 Protocol and Raptor Surveys: Pipeline Corridor, July 24, 2018
  - BDR Addendum 1 – Appendix A-3 Wetland Determination and Delineation, Proposed Pipeline Corridor, July 24, 2018

- BDR Addendum 1 – Appendix A-4 Pecos Sunflower Survey, Southern Pipeline Route, Proposed Roca Honda Pipeline Corridor, July 24, 2018
- BDR Addendum 1 – Appendix B-1 SAP for Supplemental Radiological Baseline Surveys at RH Mine, Sections 8 and 17, July 24, 2018
- BDR Addendum 1 – Appendix B-2 REPORT for Supplemental Radiological Baseline Surveys at RH Mine, Sections 8 and 17, July 24, 2018
- BDR Addendum 1 – Appendix B-3 Baseline Radiological Survey of Pipeline Corridor and Reuse Water Discharge Area, July 24, 2018
- BDR Addendum 1 – Appendix C1 – Reuse Pipeline Route Survey and Design Criteria Hydraulic Analysis and Design Pipeline Corridor, July 24, 2018
- BDR Addendum 1 – Appendix C2 – Reuse Pipeline Route Survey and Design Construction Plan Pipeline Corridor, July 24, 2018
- BDR Addendum 1 – Appendix D New Mexico Dept. of Transportation Clearance, July 24, 2018
- BDR Addendum 1 – Appendix E-1 Probable Hydrologic Consequences, Assessment of Potential Aquifer Drawdown, July 25, 2018
- BDR Addendum 1 – Appendix E-2 Probable Hydrologic Consequences, Groundwater Model Overview, July 26, 2018
- MMD Request for Agency Comments on Addendum to BDR, August 10, 2018
- Agency Comments on Addendum 1 to Baseline Data Report, November 29, 2018
- Operator Responses to Agency Comment on Addendum 1 to BDR, February 8, 2019
- Comment Letter to Operator from MMD, May 6, 2019
- Operator Responses to Agency Comment on Addendum 2 to BDR, September 18, 2019
- Comment Letter to Operator from MMD, November 4, 2019
- Operator Responses to MMD Comment Letter BDR Addendum 1 Replacement Pages, January 31, 2020
- Rio San Jose Characterization Final Report, February 20, 2020

At this time MMD considers the BDR submissions of the PAP to be complete with the addition of data from the upcoming supplemental information listed below.

As supplemental information to the BDR, Energy Fuels will be completing the studies listed below and submitting the following documents in 2020.

- Raptor Surveys (Winter/Spring 2020)
  - Follow up surveys per NMG&F 10/26/18 Recommendations for Golden Eagle and Great-Horned Owl winter use.
- Bat Monitoring (Summer 2020)
  - Per NMG&F 10/26/18 recommendations
- Grey Vireo Nest Survey (Spring 2020)
  - Follow up Spring survey (previously done in June 2019)

If you have any questions or concerns, 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: Anne Maurer, MECS Team Leader, NMED  
Alan Klatt, SWQB, NMED  
Ashlynn Winton, GWQB, NMED  
Holland Shepherd, MARF Program Manager  
Jerry Schoepner, MMD Director  
Mine File (MK025RN)

