State of New Mexico
Energy, Minerals and Natural Resources Department

Michelle Lujan Grisham
Governor

Erin Taylor
Acting Cabinet Secretary

Benjamin Shelton
Deputy Cabinet Secretary

Drew Roybal-Chavez
Deputy Director
Mining and Minerals Division

April 23, 2026

Marc Henderson, President
Laramide Resources Inc.
130 King Street West, Suite 3680 Box 99
Toronto, Ontario, Canada M5X 1B1

RE: Technical Comments on La Jara Mesa MORP Application, Permit No. CI008RN

Dear Mr. Henderson,

The New Mexico Mining and Minerals Division (MMD) has performed an initial technical review of the submitted La Jara Mesa Uranium Project Mining Operations and Reclamation Plan (MORP) by Laramide resources Inc.

In accordance with 19.10.6.605(C) NMAC, MMD provided the Application to, and requested comments from, the New Mexico Environment Department (NMED), New Mexico Office of the State Engineer (NMOSE), New Mexico Department of Game and Fish (NMDG&F), New Mexico Historic Preservation Division (NMDCA), New Mexico Forestry Division (NMSFD), and USFS.

Please review the attached comments from MMD and Agencies and provide Laramide's responses. If you have any questions regarding these comments or would like to schedule a meeting to discuss, please contact me at (505) 216- 8945 or at samantha.rynas@emnrd.nm.gov.

Sincerely,

Samantha Rynas, Permit Lead
Mining Act Reclamation Program ("MARP")
Mining and Minerals Division

Attachment A: Excel format of MMD & Agency Technical Comments
Attachment B: PDF format of Agency Technical Comments

CC: David (DJ) Ennis, Program Manager, MARP, MMD
Clint Chisler, Reclamation Specialist Supervisor, MARP, MMD
Mine File CI008RN

La Jara Mesa Mine - MORP Technical Review Permit No. CI008RN Date: April 2026		
Name of Operator: Laramide Resources		
Comment #	**Section**	**MMD Comment**
1	Unresolved BDR comments	MMD has a few comments related to needed data or information which is pending the submittal of the updated BDR. These are placed in front of MORP specific comments.
2	Unresolved BDR comments	All material (cover or being used as development "waste" rock) must be characterized prior to use on surface. MMD Soils comments from BDR on waste rock (#27, #28, 29, 32) – Laramide indicated additional waste rock details would be provided in the MORP. MORP lacks details on waste rock characterization, sampling of waste rocks, and has no mention of a material handling plan. Additionally, MMD BDR comment 32 on Orebody. "Laramide agrees to sample waste rock periodically during operations. It is not feasible to characterize the variability across the total length (5,000 ft) of the access tunnel before initiating mining. A description of this sampling will be included in the MORP." □ No sampling plan was described.
3	Unresolved BDR/ Figure 2-1	As previously noted in the MMD technical review of the BDR, comment 34 "In accordance with 19.10.6.602.D(13)(f): MMD is requiring comprehensive maps and supporting data. While Figure 6 shows geological formations, it is insufficient." MMD still needs a more detailed geology of the area. As it relates to the MORP, it should include areas of subgrade ore, and more detailed fault mapping.
4	General	MMD will require an enclosed the ore pad. An enclosed ore pad at this site is a best management practice for environmental protection due to the site characteristics. Future revisions of the MORP must include a building enclosing the ore pad. Public comments and Tribal concerns underline the importance of ensuring utilization of best management practices, from minimizing site water needs to preventing windblown contamination off site.
5	General - Figures	MMD would like to request all figures be provided at full resolution as attachment in addition to the smaller images placed in the report. For example, figure 2-5 through 2-8 have low resolution and are not provided separately like the other construction design figures.
6	General/Section 1 - Introduction	19.10.6.603; Overall, the MORP is lacking in details of specific details on the proposed reclamation. The introduction to the plan does not even reference the reclamation portion of the permit. This section needs to address the reclamation of the proposed operations.
7	General	MMD will need a proposed cost estimate to reclaim the site from operational to reclaimed.

8	2.9	Related to above, Section 2.9 should be significantly expanded, and the reclamation plan lacks details on the scheduling of activities. Please elaborate on how the site will be expected to complete reclamation in the 2-3 months. For example: How long to decommission buildings, how long to tear down and haul material, how long earth work (re-grade and re-establishment of drainages, install of rip rap or channels) will take, and placement of topsoil. Additionally, the escape raise time frame should also be addressed as well.
9	Page 7	“Site layout figures (Figure 2-22 and Figure 2-3)” à Should that reference figure 2-2, not 2-22?
10	2.1	“NMAC Section 19.10.6.602 D (15) (a) (ii)” NMAC reference does not exist, is this referencing the MORP, subsection 15?
11	2.1/2.8.2.6	“If the results of the development work and associated economic evaluations indicate that commercial mining is not feasible at the location, Laramide would stop the development work and reclaim disturbed areas pursuant to the Reclamation Plan.” – MMD has concerns on the potential changes to the reclamation plan if project stops development mid-project. For example, if project terminates at “phase 2” of development plan, Laramide will be required to revise the Permit/Reclamation plan. The current reclamation plan is planned around specific cubic yardage produced from operational mining, this would be a different reclamation plan, requiring a revision. As noted in 2.8.2.6 Laramide acknowledges “procedures may be revised through on-going development and evaluation…of the EIS”: If the EIS evaluation changes plans Laramide has submitted to MMD, Laramide will need to ensure submittal of changes to MMD. Changes to the Operations or reclamation could affect MMD permitting.
12	2.1.1	Table 2-1 - While waste rock volumes include swell and overbreak, is there a factor to account for waste rock NOT suitable (i.e. sub-grade ore) for use as surface waste rock? Pg. 14 - Indicated current deign needs 266K cu/yd. Is there a contingency if “clean” waste rock doesn't meet that volume?
13	2.1.1	19.10.6.603(A) & (C)-For best management practices, Please expand on the monitoring methods and equipment that will be at portals/escape raise locations that will be used during mine development/and production. Examples to include: • What is the expected operation hours and decibels the ventilation will produce? • While the benches are being developed, what BMPs to manage water will be implemented in the interim?

14	2.1.1	19.10.6.602(15) (a) – Method and mining techniques used Please expand on the developmental phase and the blasting operations. Additional details needed include: •Elaborate on the "precautions applicable to surface blasting operations" •When blasting would likely occur (example: between 9am-4pm) •How would fly rock damages be minimized •Notification to local communities prior to blasting •Elaborate on the measures and monitoring practices taken to prevent adverse effects to structure - or provide expected range blasting could be felt and any structures that are in the expected range. •How noise effects will be minimized. MMD will require a blasting plan as a condition of the Permit.
15	2.1.2/2.1.3	Please describe how waste rock characterization works into the work schedule for incline excavation phase as well as the escape raise. Section 2.1.6 mentioned bulk sampling of mineralized uranium, but no waste rock samples are proposed prior to reaching mineralized zones. Research on the Grants Uranium belt shows that essentially all formations of the Morrison formation could host Uranium. One example being, the Taffy mine, directly above La Jara is a Sandstone hosted Uranium mine site located in the same formation (Bluff sandstone) the incline excavation will be passing through. Without more detailed geology data, drill logs, and sampling, MMD has concerns on these materials being used as development rock. Laramide needs to provide waste rock characterization to ensure suitability for development use.
16	2.1.3	19.10.6.603(C)(1): Please include what safety measures will be implemented to prevent public access to this area during the developmental phase.
17	2.1.3	19.10.6.603(B) During development and construction for the escape raise the footprint will differ from the final facilities footprint. Please provide additional details on the footprint needed during the developmental stage (such as lay down area, equipment storage, parking, fencing) and any reclamation needed after facility construction is completed. Also USFS Comment #108.
18	2.1.3	Escape Raise Closure – The MORP does not contain the design drawings for the design of the escape raise at closure. In reviewing the drawing provided in the BDR, MMD will require a PUF plug, in addition to a “cap” versus an unsupported plate for capping and sealing the collar. MMD will require 18 in of growth medium cover on the rock. Additional details are: •The auxiliary cement pads at the facilities, how are these disposed of and reclaimed? •Are there utility lines or equipment located in the shaft that needs to be removed at closure? (fans, electrical lines, monitors…) •What is the scale/size of the expected mound with the cover? •Given the rock cover and topsoil appears to be projected at roughly 5 feet tall, how large the circular diameter of the unit will be? Only a side profile was provided, design lacks details on the 3-D design of the closure.

19	2.1.3	Escape Raise waste rock – How is this material being testing for suitability for use as surface waste rock? No sampling proposed and crosses multiple lithologies, some of which are known to contain uranium. Specifically, there is a "tail" at the bottom of the escape raise that extended through the mineralized zone and into the west water. How will that material be handled and sampled?
20	2.1.3	How will the USFS roads on the mesa be maintained during development of the escape raise as well as at operations?
21	Figure 2-4	Where will utilities be installed/connected at the escape raise?
22	Figures 2-5 through 2-8	These drawings lack details on storm water controls while the site is in development. These will be required during construction. Describe the BMPs planned for use during this development. Under 2.3.1 Stormwater management controls are mentioned but the drawings do not indicate where features such as a sediment basin would be installed during development.
23	2.1.5	No details are provided on collecting information on mineralization suitability for surface waste rock. Expand what is meant by "environmental testing…assaying" and well was detection limits that will be employed.
24	2.1.6	Bulk Sampling – This section needs more details on this phase. •At what stage of pre-liminary site development is the bulk sampling expected to occur? Phase 4 does not show an ore pad constructed. Please clarify details on when and how this material is being stored. •Quantify in unit what "relatively large" equates to. •What is the expected frequency of haulage at this stage? •How is material at this developmental stage managed to prevent wind and water contamination.
25	2.2	Please clarify which NMAC rule you are referencing.
26	2.2	"Mined-out areas would be backfilled with waste rock (uneconomic) material to minimize the amount of waste rock hauled to the surface." - Expand on how/when waste rock is characterized to determine uneconomic versus waste rock that is un-mineralized and safe for the surface.
27	2.2	"Throughout the production process, development drifts would be constructed beneath the ore zones with ramps driven upwards from these drifts to access the ore zones. This allows for the systematic extraction of ore in a logical sequence, backfill of these mined-out areas with waste rock, and sealing of the minedout areas from the main flow of ventilation, which provides targeted ventilation to active areas." This section should reference the sampling plan to address how material is determined as unsuitable for surface use and must remain underground.
28	2.3	Figures 2-5,-6, -7, -8, During these phases –Clarify which areas have the growth medium recovered; Is it also staggered like the development phases or is all growth material collected at phase 1? How would erosion be managed if it is the latter?
29	2.3	As MMD has requested additional data for the soil and has not received any new data related to available material on site as the new BDR is still in progress, please incorporate how this volume is calculated. If available material does not meet the required cover quantity, Laramide will need to identify a possible borrow area.

30	2.3 / 2.4.9	Growth Medium stockpile – During site inspections, large mass wasting events have been observed subsequent to rain events due to the nature of the site. Given this, are there any structures or features to buttress the growth medium stockpile to prevent loss of growth medium? While vegetative cover is proposed, it likely will only prevent a portion of erosion and doesn't prevent erosion prior to establishment of vegetation.
31	2.3	Please describe the timing and construction of the utility corridor.
32	2.3.1	As previously noted in the BDR review, material on the Elkins Ranch road had elevated RAD levels. Pending the new RAD survey in the updated BDR, please elaborate how the access road will be developed if the area is confirmed to have elevated RAD levels.
33	2.3	During this development, if any material is characterized as sub grade ore prior to Clay liner being built, where will this material go?
34	2.4.1	As previously noted; MMD will require an enclosed Ore pad area. Address this section accordingly.
35	2.4.1	Expand the details on how the stockpile clay liner will be developed, designed and ensure the efficacy of protecting the subsurface.
36	2.4.1	During development work is there a temporary lined area for mineralized materials not suitable for surface use?
37	2.3/ 2.4.1	The Figures 2-5, -6, -7, -8 do not show the development of the clay liner. As described in the 2.4.1 the clay liner will be developed to a beginning size and then expanded, but this is not shown or described in the surface development portion.
38	2.4.1	MMD recommends using terminology consistently to avoid confusion between distinct materials. Material stored at the ore pad is more appropriately described as an ore dump versus a 'stockpile'. The term 'stockpile' also refers to the surface waste rock stockpile composed of clean rock, which has a different use and material quality.
39	2.4.2	MMD has concerns on the re-use of water that has come in contact with the main operations bench for use in areas outside of the operations bench. See also SWQB comment 6 (NMED comment 12).
40	2.4.2.1	In previous sections the Ore pad is described as 'Clay lined" however this section states "clay or high-density polyethylene (HDPE) lined". Please clarify which liner material will be used, and provide the ore pad design details, including how the liner system will prevent infiltration and meet standards. Design elements may change for an enclosed ore pad design.
41	2.4.2.2	See SWQB Comment 4 (NMED comment 10) – references newer data supporting climate change impacts to anticipated storm events. This concern has also been raised in the Public comments as well. MMD encourages Laramide to review and consider the public comments and concerns on climate impacts to current models while sizing and designing these storm water systems.
42	2.4.2.2	What are the recommended intervals for the "routine" inspections?
43	2.4.2.2	Please expand on what the "reasonable measures" are. •For example: scrape and bury contamination? •Post incident RAD survey/soil testing? •Corrective actions to prevent control measures from failing again? •What reclamation would occur on areas impacted?
44	2.4.6	MMD received numerous public comments with concerns on the milling location. MMD recommends including the "off-site mill" location in the MORP for transparency. Addionally there were requests on the DOT requirements for hauling of material and the routes for hauling.

45	2.4.7	"Water would be used to suppress wind-blown dust from mineralized run-of-mine ore temporarily placed on the pad adjacent to the portal to await loading for transport, as necessary. Given seasonal variations and day-to-day fluctuations at the various La Jara Mesa facilities, a 10 percent contingency has been used." As previously noted, update this section to reflect an encored ore pad as water usage is a concern of Laramide's, enclosed storage would minimize water consumption.
46	2.4.9	Topsoil/growth medium – all material should be placed in a defined storage location with erosion controls. Left in unmanaged windrows is not managing the material. This section needs specifics on BMPs, engineering designs, slope design etc. that are being considered to manage the material. Please provide more details on specifics of "protected…configured…".
47	2.4.9	If there is not enough growth medium a test plot program would be required for "amended" subsoil material or borrow material needed for available cover. Borrow areas would be considered an affected area and would be subject to review not only for MMD but under the EIS process. Laramide should ensure through the soil study that they have the materials required to replace topsoil to depth of 18in. MMD will be requiring an 18in depth due to experience of project in areas prone to wind and water erosion. If this is not feasible it must be addressed as soon as possible to incorporate into the BDR/MORP. Please clarify what the "subsoil" material is?
48	2.4.9	MMD cannot fully review the technical feasibility of this section as there is no complete BDR data on quantity of available material. This section will need to be updated to reflect the data gathered from baseline data informing availability of growth medium.
49	2.4.10	Waste Rock dumps: Also need to reference sections 603(C)(7) and (10), and how these requirements will be met. Why was the cubic yardage of 270K used for the specific sizing? Please provide the context of why or how 270K cu.yd. of material is being used. See also previous comments re: concerns on quantities of clean surface rock.
50	2.4.10	This section includes terminology that can confuse the quality of material being handled (See previous comment about the Ore stockpile). It is imperative to define Waste rock that is suitable for use on the surface versus mineralized ore quality rock versus "valueless" (ie subgrade ore) mineralized rock.
51	2.4.10	In accordance to 19.10.6.602(D)(15)(K) - This section needs to also reference the sampling and characterization of rock and how it will be handled through a material handling plan.
52	2.4.11.1	What facilities or structures are planned at the "driveway access". Is there a guard station or other facilities/structures that would need to be removed at closure?
53	2.4.11.2	Are any facilities proposed within the Adit for maintenance, PPE gear storage, or other needed equipment? Would these need to be removed from the Adit prior to backfill/closure?
54	2.4.11.5	Please provide the specific plan for how power is provided, both above and below ground options are suggested. Are these planned to be installed in the road utility corridor, or would it cause additional disturbance not accounted for?

55	2.5	Contingency plan: What measures would be taken if Process water over topped?
56	2.5	New wildlife surveys are still in progress, which was requested in the BDR technical review, this section will need to be updated to reflect any new data from wildlife surveys.
57	2.5	Laramide states these listed measures are a "minimum", what additional measures are being considered if more impacts are identified or occur? Example, if soils become contaminated what actions would Laramide take?
58	2.5	Exposure of animals to mineralized material is not considered in the Mitigation and contingency plan. What measures would be taken to prevent small animals or birds from contacting mineralized material such as process pond water?
59	2.6	"Waste rock surfaces are expected to be left rough, and benches would be placed to minimize slope lengths to no longer than 300 feet to help minimize the development of erosion gullies." Please give additional details on how often benching would be done, as well as rip rap, channels or berms that would be used. MMD requires a maximum of 200 ft slope, please address the slope lengths.
60	2.8	MMD will require a reference area for vegetation, no reference area is proposed in MORP.
61	2.8	"remove surface facilities and infrastructure and establish a vegetative community on the disturbed surface areas" – After infrastructure there will be significant re-grading and earth work required to return the site to appropriate grades. Then vegetation can be established. MMD needs additional details on regrading activities, including cross sections of the slopes with cover. Laramide provided the designs during development; the same level of construction detail should be provided for the reclamation plan as this design is what determines Financial Assurance.
62	2.8.1	"Construction reclamation" This section discussed components that are more in line with operational activities. Maintaining the stockpile, noxious weeds on site, and using temporary BMP's such as Silt fencing are considered operation versus reclamation in nature. MMD recommends this title be adjusted to "Operational Site management".
63	Table 2-8	Part 6 mines are required to meet both quantity (90% of the reference area) as well as diversity requirements. Only grasses are present in the seed mix, no woody plants or forbs have been proposed. MMD has revegetation guidelines available on our website. From MMD's guidance "The seed mix selection should be made with the ultimate goal of reaching the cover, production, and diversity requirements set forth in each specific permit." The seed list proposed will not need these requirements. MMD notes that new vegetation surveys are underway. The need seed list should reflect data gathered from these surveys to inform the seed selection.

64	Table 2-8/Revegetation	As mentioned earlier, this site is susceptible to both wind and water erosion. MMD suggests reviewing research related to minimizing dust generation at uranium sites, specifically this article. Brown, R., and Cadol, D., 2020, Vegetation density and vapor pressure defi¬cit: Potential controls on dust flux at the Jackpile uranium mine, Laguna Pueblo, New Mexico: New Mexico Geological Society, Guidebook 71, this volume. “Though sample size was small, vegetation stand density may be an important factor controlling the erodibility of the soil in the vegetation stand’s immediate vicinity. Sparse and moderate stands were similar in soil uranium concentra¬tion to grassland systems suggesting there may be a critical stand density that needs to be achieved before significant dust deposition occurs in juniper stands. This relationship could have important implications in future remediation efforts when deciding what species to plant and where to plant them to con¬trol erosion and dust generation.”
65	2.8.2	Reclamation progression should provide a timetable of activities.
66	2.8.2	Need additional details on Final reclamation actions. See previous comments on removal of facilities at gate, inside Adit, inside escape raise. This section should be described at a 30% design level, as this determines Financial Assurance.
67	2.8.2.2	During removal (structures/equipment/tools) how will materials be screened for RAD levels prior to leaving the site? This will be need to determine an accurate cost estimate.
68	2.8.2.2	“Laramide does not propose to construct permanent roads that would remain after final closure of the project.” – describe how roads will be reclaimed. And what size will remain.
69	2.8.2.3	“Each incline would be backfilled with waste rock material, extending from the portal bulkhead to outside the actual portal.” à Where is this waste rock sourced from? What is the cu. yd expected to be placed?
70	2.8.2.3	Escape raise closure – MMD will require a P.U.F. plug and cement cap. See previous comment.
71	2.8.2.3	What is the total expected “height” and diameter of the escape raise cover? With 4-5 feet of rock material, a foot of growth material as well as, upwards of a 6-foot sized mound. What is the slope of the sides? How will this be designed to blend into the surrounding topography?
72	2.8.2.4	“Waste rock materials removed from the underground operations do not represent any potential for acid rock drainage.” à This statement will need to be supported by waste rock characterization data as well as testing for RAD content as part of a material handling plan.
73	2.8.2.5	As described in mine development, is there a similar staged approach for replacing growth medium?

74	2.8	Laramide proposes to estimate reclamation costs based on the 1996 MMD Closeout Plan Guidelines in accordance with final closure and reclamation plans. Details required in the final reclamation cost estimate are expected to satisfy the bonding requirements of both the state and USFS. MMD will require a proposed closure cost as Laramide progresses further down the permitting process.
75	2.11	“toxic drainage” - this needs to include that material is suitable as “waste rock” and is not low-grade ore or uranium bearing.
76	2.11	Any changes in site facilities/design should be submitted to MMD for review as this could require a modification to the permit.
77	2.12	This figure needs to be provided as a standalone figure for better resolution, as previously mentioned. Additionally, this figure will need more details provided such as slopes and features that will minimize mass movement.
78	Figure 2.10	In accordance with 19.10.6.603(C)(7) & 603(D): MMD requires additional information on how geotechnical risks have been evaluated and mitigated. No supporting geotechnical analyses for engineering features have been provided to justify the proposed designs being considered stable. Please clarify what ‘other means of mechanical stabilization’ are being considered and provide detailed geotechnical design information demonstrating how site stability will be ensured.
79	2.12	“Pursuant to Section 106 of” – MMD is also following the state requirements for Tribal Consultation under the State Tribal Collaboration Act, which should additionally be referenced.
80	4.1.2	Given the Mt. Taylor TCP designation, please describe how Laramide’s reclamation of the Permit area incorporates measures to preserve the viewshed and the cultural character of the site.
81	4.1.2	MMD needs better clarification on this section, previously mentioned plans for trucking in water should be described in this section, to include the source of the water.
82	4.1.3	Hydrologic Balance – MMD has requested additional baseline data regarding the potential occurrence of water within the mesa. This section will need to be updated to reflect baseline data. The hydrologic evaluation should include supporting data on the mesa’s geology, including the presence of critical fracture zones, the potential for perched aquifer zones, the groundwater systems within and beneath the mesa, and the groundwater flow directions. These data are necessary to substantiate the assumption that no groundwater is present within La Jara Mesa
83	4.1.3	Laramide should also note that 19.10.6.603(C)(4) does not only pertain to aquifer hydrology at the site, but also the surface hydrology of the site. This section should include regulations listed under this rule.
84	4.1.3	This section should include regulations listed under this rule.

85	4.1.7	Citing partial backfill of waste rock is inconclusive. How much material is expected to remain in the mined out areas that would prevent subsidence? Subsidence is also a safety factor during operations, not just for end of mine life/collapse of surface of the mesa.
86	4.1.7	Best management practices: Are there any plans to monitor for mass movement for the project? (Underground, or waste rock structures)
87	4.1.8	Please provide the data supporting this statement. Specifically address Aquifers present below the mine workings.
88	4.1.10	“the nonmineralized character of the waste rock stockpile”…“toxic releases” includes material with increased RAD activity. See Material Handling plan/waste rock testing comments.
89	G102	Site map: What size is the Water storage tank (#3)?

La Jara Mesa Uranium Mine Project - USFS Comments on MORP Attachment to 03/05/2026 Letter Correspondence						
Comment #	**Resource Code**	**PDF Page #**	**Section**	**Subsection**	**Highlight Text**	**USFS Comment**
1	Geo1	5	1	1 Introduction	1 Introduction	This introduction needs to include USFS applicable regulations since NM state code is in this section. United States mining laws govern locatable mineral operations on public lands, including NFS land. Locatable minerals operations on NFS land are subject to regulations at 36 CFR 228, Subpart A, which require operations to be conducted, where feasible, to minimize adverse environmental impacts on NFS surface resources. As defined in 36 CFR 228.3(a), mineral operations include “all functions, work, and activities in connection with prospecting, exploration, development, mining, or processing of mineral resources, and all uses reasonably incident thereto, including roads and other means of access on lands subject to the regulation in this part, regardless of whether said operations take place on or off mining claims.”
2	Geo1	14	2	.1.6 Bulk Samplir	2.1.6 Bulk Sampling	This section needs more information on its activity description. It is unclear when the clay-lined surface will be constructed to hold the material from the proposed bulk sampling activity. Bulk sampling is described during Phase I – Underground Development Activities and the clay lined surface is not mentioned until in Phase 2 – Underground Mine Production. The MORP implies Phase 1 will happen first prior to Phase 2. In Section 2.4.1, there is discussion of the bulk samples on the clay-lined surface and transported to an off-site mill, this needs to be included in Section 2.1.6 even if redundant. The BMPs for the mineralized uranium material need to be described as thoroughly as the ore dumps since radioactive material will be exposed and stored on the surface.
3	Geo2	16	2	2.1.8	Surface	Need estimated size for water truck, motor grader, dozer, backhoe.
4	Geo2	21	2	2.3.4 Surface Development Phase 4	Surface Area of Disturbance	Clarification on why there is a drastic difference in total surface disturbance and "Estimated area of industrial activity at your facility exposed to stormwater (to the nearest quarter acre): 80.25 acres "mining activities only" and 95.75 acres ”mining activities with access roads" pg. 1 of the SWPPP
5	Geo2	21	2	2.3.4 Surface Development Phase 4	Reclamation activities, such as regrading and\rreseeding, are expected to require	3 months appears to be a short timeline for reclamation and closure. Please provide a more detailed reclamation schedule and what will occur in that three months. Is this only speaking about the regrading and reseeding work and not the full reclamation schedule?
6	Geo2	21	2	2.3.4 Surface Development Phase 4	and make\rimprovements to bring water	Please expland on the statement that improvement to bring water to the site could occur. It was CNF understanding that drilling a well was removed as an option so what other improvments is Laramide considering?
7	Geo2	22	2	2.4.1 Leach Pads, Heaps, Ore Dumps, and Stockpile	stockpiled on a flattened, clay-lined surface next to the portal,	How will fugitive dust from this ore pile be managed? Will it be monitored for windblown particles? Provide more construction details for the clay lined pad. Will it meet standards to prevent uranium transport to subsurface soils? How will the clay lined surface be tested that it is still sufficient and would Laramide consider a composite liner system?
8	Geo2	22	2	2.4.2 Impoundments	control downstream release.	Is down stream release of potentially contaminated/contaminated water allowed? Is evaporation and disposal of sediment preferred?
9	Geo2	22	2	2.4.2 Impoundments and Stormwater Control	Water in the upper pond would be used for\roperations and dust control in non-mining areas. Water in the lower pond would	Will this potentially contaminated/contaminated water be used outside of the mine facilities footprint for dust abatement on the access road?
10	Geo2	22	2	2.4.2 Impoundments	hydrologic\rmodel	The hydrologic and hydraulic model will need to be evetually provided to the CNF for environmental analysis.
11	Geo2	23	2	2.4.2.2 Two-Stage Stormwater	discharge expected\rvolumes from successive storms.	Will this potentially contaminated/contaminated water be used outside of the mine facilities footprint for dust abatement on the access road?
12	Geo2	23	2	2.4.2.2 Two-Stage Stormwater	discharge expected\rvolumes from successive storms.	Is down stream release of potentially contaminated/contaminated water allowed? Is evaporation and disposal of sediment preferred?
13	Geo2	24	2	2.4.3.1 Sewage Disposal	via a septic tank and leach field system.	Reclamation of the specifc tank and leach field system needs to be described.
14	Geo2	25	2	2.4.7 Water Use and Management	Storage tanks may be used to store and collect water.	Proposed tank sizes are needed. Tanks will considered temporary structures for RCE and sizing to calculate removal cost is required.
15	Geo2	26	2	2.4.7 Water Use and Management	Projected Water Use Estimates	Noting that estimates have gone up. Is there a reason estimates increased from the previous Plan of Operations?
16	Geo2	26	2	2.4.7 Water Use and Management	A binder, MgCl,	First mention of an additive for dust suppression. Need to include description of use in other appropriate sections for inclusion.
17	Geo2	26	2	2.4.7 Water Use and Management	Water would be used to suppress wind-blown dust from mineralized run-of-mine ore temporarily placed\ron the pad adjacent to the portal to await loading for transport, as necessary. Given seasonal variations\rand day-to-day fluctuations at the various La Jara Mesa facilities, a 10 percent contingency has been\rused.	Would Laramide considered a covered structure for the run-of-mine ore?

18	Geo2	27	2	2.4.8.2 Maintenance Shop with Equipment Parking and Storage Area	2.4.8.2 Maintenance Shop with Equipment Parking and Storage Area	Are there proposed features or mitigations for the release of hazardous substances from vehicles? Or temp storage containers for hazardous substances needing to be disposed of?
19	Geo2	30	2	2.4.10 Waste Rock Dumps	Laramide does not propose to backfill\rwaste rock in the main underground inclines for closure.	Noting that this is a change from previous plan of operations.
20	Geo2	31	2	2.4.11.1 Site Access	Currently, access to the surface portal is via Forest Service Road 450. Future access would be from NM\r605 via an existing unimproved private surface road, where a gate and signage will restrict public access\rto the site. This road is about 3.7 miles across property owned by Homestake and Elkins Ranch. It once\rprovided access to the F-33 Mine. The road is currently not maintained but is still used as a two-track by\rranchers and others. It would be widened, graded, and possibly surfaced for use as a haul road.	This section is missing the construction of the new straight section of the haul road to NFS road 450 to remove the bend into the corral.
21	Geo2	31	2	2.4.11.1 Site Access	Road 450,	450 & 450F. Need to also check in on motorized trail at the end of 450f to the north (not the unnamed two track mentioned).
22	Geo2	31	2	2.4.11.1 Site Access	placement of appropriate sub-base material and gravel,	source location? No need for on forest borrow pits?
23	Geo2	32	2	2.4.11.5 Power Supply	Above- or below-ground\rservice to the mine would then be constructed.	Where? Will need more details on location.
24	Geo2	32	2	2.4.11.7 Communications	Laramide would install telephone and Internet communications to the site using area providers.	How and where will these utilities come from and into the mine site?
25	Geo2	33	2	2.4.11.10 Security and Fencing	Security and Fencing	Will Laramide consider fencing along the haul road from the facility to the junction of 450 and private road? For cows
26	Geo2	33	2	2.5 Wildlife Mitigation and Contingency Plan	The USFS is expected to make a determination of no effect with regard to federally listed species.	Please remove this statement, this will be covered in NEPA and has not been discussed with Laramide.
27	Geo2	37	2	2.8.2.2 Removal of Structures and Facilities	Unsalvageable portions of any facilities, such as a concrete pad used at the temporary maintenance\rshop, would be broken up and buried on site in accordance with solid waste regulations of the New\rMexico Environmental Improvement Board (i.e., definition of â€œclean fillâ€ under Title 20, Environmental\rProtection, Chapter 9, Solid Waste, Part 2, Solid Waste Management General Requirements). As\rapplicable, the CNF would determine the location and depth of the disposal if it is located on CNFmanaged\rlands.	Stating "as applicable" is confusing because the example provided of the type of "clean fill" proposed (concrete pad for maintance/shop) to be buried for reclamation will be constructed on National Forest System lands. What situation would result in Laramide not proposing to bury "clean fill"? If there isn't, please remove "if applicable" and confirm that Laramide will consult with CNF on disposal of clean fill.

28	Geo2	38	2	2.8.2.4 Recontouring and Regrading	Waste rock materials removed from the underground operations do not represent any potential for acid\rrock drainage.	This would be a good place to reference waste rock characteristic data.
29	Geo2	38	2	2.8.2.4 Recontouring and Regrading	Waste rock materials removed from the underground operations do not represent any potential for acid\rrock drainage.	Why is this not considered a permanent waste rock impoundment?
30	Geo2	38	2	2.8.2.5 Growth Medium Replacement	2.8.2.5 Growth Medium Replacement\rGrowth medium material that has been salvaged and stockpiled during site facilities development would\rbe distributed across recontoured and re-graded areas prior to fertilizing, mulching, and seeding.	If not enough growth medium can be salvaged are there plans to import material? Will this be found somewhere on NFS lands via a borrow pit or purchased from a private seller?
31	Geo2	39	2	2.9 Reclamation Schedule	Closure will be\rinitiated immediately following the end of ore production and is expected to require approximately 2 to 3\rmonths of concentrated on-site work.	3-months of reclamation work seems fast. Please provide a more detailed schedule on what will occur in those three months. Will this be enough time for the proposed work?
32	Geo2	40	2	2.11 Post Mining Acid or Other Toxic Drainage	Updated baseline data for the current project proposal is expected in\rsummer 2026.	We would like to see this baseline data once it is available to verify that waste rock will be non acid or non toxic draining.
33	Geo2	40	2	2.11 Post Mining Acid or Other Toxic Drainage	In previous baseline data collection and testing, most samples demonstrated net acid-neutralizing\rpotential.	Where is this data? Can it be referenced and attached to the plan?
34	Geo2	42	4	4.1.1 Signs, Markers, and Safeguarding	Signs would be placed in accordance with MSHAspecific\rstandards and regulations.	Signage will need to take into consideration FS standards and regulations on NFS roads since certain roads will still be open to public access.
35	Geo2	43	4	4.1.3 Hydrologic Balance	Underground mining operations would be limited to geologic formations that are above the regional\rgroundwater aquifer. Operations will not impact aquifers.	Will data to support this statement be provided as a reference in the plan?
36	Geo2	22	2	2.4.1 Leach Pads, Heaps, Ore Dumps, and Stockpile	Mineralized uranium material (bulk samples) removed during underground development work would be\rstockpiled on a flattened, clay-lined surface next to the portal, then loaded onto highway trucks for\rtransport to off-site mills.	What does the dashed line around the stockpile area in the Figures represent? See Figures G102 & G103
37	Geo2	25	2	2.4.7 Water Use and Management	Water use and management will be important for the project.	Is water from impoundment ponds being proposed for use? Figures show a raw water supply line from the first impoundments pond to the portal area.
38	Geo2	45	4	4.1.5 Impoundments	Growth medium stockpiles would be protected from wind and water erosion. Because these stockpiles\rwould remain in place for the duration of the mining, they would be seeded during the first normal planting\rseason following their completion.	How is this related to impoundments? This paragraph appears out of place.

39	Geo2	46	4	4.1.9 Explosives	The only surface blasting that might be used will involve the â€œface-upâ€areas for the two planned portal\rentries. In this case, Laramide will conduct blasting to minimize â€œflyrock.â€	Please confirm that Laramide will provide CNF with blasting plan once one is available for both surface and underground operations. Laramide will need to coordinate surface blasting with CNF since area around the mine site is open to the public.
40	Geo2	23	2	2.4.2.1 Contact Water (Process) Pond	2.4.2.1 Contact Water (Process) Pond	If a covered facility for the ore stock pile is considered this could eliminate the need for a pond of this size and could be scaled down or eliminated fully.
41	Geo2	23	2	2.4.2.1 Contact Water (Process) Pond	Evaporation was explicitly incorporated into the design basis by applying seasonal pan evaporation rates\rover the pond surface area during the non-monsoon period (approximately September through May) and\rcombining this with a continuous process water withdrawal of about 10 gallons per minute for\runderground operations. Using this approach, the annual precipitation and evaporation water balance\rdemonstrates that the process pond can store up to 1 year of stormwater inflows from the ore stockpile\runder the conservative storm sequence assumptions and be drawn down by operational reuse prior to\rthe onset of the subsequent monsoon season. Runoff into this process pond will only be allowed to\revaporate or will be returned underground for use in operations and dust control.	Can Laramide confirm this water has adequately water quality to be reused as is without treatment? or is settling enough? May be a mute point if a structure is considered and pond eliminated or downsized.
42	Geo3	6	2	2 Overview of Mining Operations	the unmineralized â€œdevelopment rockâ€ excavated would be used to build a waste rock stockpile at the\rportal site.	Will the "unmineralized" development rock be characterized? In addition, how will the the material be characterized to ensure constituents are not leached from the material?
43	Geo3	8	2	2.1 Phase I—Underground Development Activities	If the results of the development work and associated economic evaluations indicate that commercial\rmining is not feasible at the location, Laramide would stop the development work and reclaim disturbed\rareas pursuant to the Reclamation Plan.	What timeline would be feasible for testing the deposit's characteristics and collecting the results in order to determine this decision?
44	Geo3	17	2	2.2 Phase 2—Underground Mine Production	main flow of ventilation, which provides targeted ventilation to active areas.	What regions of the underground mine will be considered the main ventilation? What areas are considered active? Would these areas be the active areas that are actively being mined?
45	Geo3	21	2	2.3.4 Surface Development Phase 4	Reclamation activities, such as regrading and\rreseeding, are expected to require approximately 3 months to complete (further reclamation details are\rprovided in Section 2.8).	The timeline of 3 months for the reclamation activities seems like a short time-frame. Is the 3 months considered the timeline for only regrading and reseeding during reclamation? (Would it be more prudent to give a longer time-frame considering the possible changes that could occur during the project and the activities that may be required to complete final reclamation?) Please provide a table with a more specific schedule for the proposed reclamation activities.
46	Geo3	22	2	2.4.2 Impoundments and Stormwater Control	To appropriately design and size these controls, precipitation records and models were evaluated using a\rhydrologic model.	Considering the facilities such as the stormwater controls and ponds , please attach hydrological model used to design these features.

47	Geo3	23	2	2.4.2.2 Two-Stage Stormwater Contact Pond	Multi-Sector General Permit	Within the SWPPP the expiration date listed for the the Multi-Sector General Permit (in Attachment D) is on February 28th, 2026. The permit will likely need to be updated or resubmitted for the project.
48	Geo3	25	2	2.4.3.2 Solid Waste Disposal	Any petroleum waste products would be stored in approved containers on-site, separate from\rother waste, and transported off-site for recycling or disposal at an approved facility.	Petroleum waste products will need secondary containment and spill containment prevention.
49	Geo3	25	2	2.4.6 Mills	Ore mined from the underground workings at the La Jara Mesa Project site would be transported to an\roff-site mill for processing.	Verbally the Energy Fuels White Mesa Mill in Blanding, Utah was discussed. Would the off-site mill proposed in the MORP be the mill in Blanding, Utah?
50	Geo3	25	2	2.4.7 Water Use and Management	Water for the project would be purchased. Multiple sources may be identified to provide a sufficient\rsupply.	What are the sources for water supply proposed to be purchased for the project and what infrastructure would be needed to support the water supply source options? If this is not answered during this environmental analysis and the infrastructure is a significant enough deviation from the proposed action, a supplment to the plan of operations will be required and another environmental analysis may be needed in the future.
51	Geo3	27	2	2. 4 . 8 .1 Employee and Visitor Parking	During development work, parking may be provided for 20 to 25 vehicles expected to transport workers to\rthe site.	Would the project site area be able to accommodate this number (20-25) of vehicles to transport workers to the site? Confirm that the mine footprint would not change to accommodate this parking
52	Geo3	28	2	2. 4 . 8 .5 Materials and Supplies	Table 2-7 Materials and Supplies	How often would the materials and supplies listed in Table 2-7 be refueled for the mine operation?
53	Geo3	29	2	2. 4 . 8 .5 Materials and Supplies	These substances would be transported and\rdisposed of by certified vendors.	When and how frequently would waste from these various sources be disposed of off-site during the life of the project?
54	Geo3	29	2	2. 4 . 8 .5 Materials and Supplies	Laramide would maintain Safety Data Sheets (SDSs) for chemicals\rstored on site.	Please include these SDS for the proposed chemicals to be stored on site with the MPO submission.
55	Geo3	31	2	2. 4 .11. 1 Site Access	A driveway access permit would be obtained prior to constructing the haul\rroad improvements in the NMDOT ROW.	NMDOT ROW: Please clarify would ROW stand for right of way?
56	Geo3	34	2	2.5 Wildlife Mitigation and Contingency Plan	Diesel fuel and gasoline would be stored in accordance with an approved Spill Prevention Control and\rCountermeasure (SPCC) Plan for the operation as required by federal oil spill prevention regulations\r(40CFR112).	A SPCC for the operation will need to be submitted to the Forest Service.
57	Geo3	34	2	2.6 Erosion and Sediment Control Plan	Laramide would implement BMPs to minimize or eliminate erosion and\rsubsequent down-drainage sedimentation.	Please clarify that BMPs stand for Best Management Practices within the document. How were these BMPs determined, for example are they based on Forest Service standards? Additionally provide sources for these BMPs.
58	Geo3	36	2	2.8.2 Final Reclamation	Reclamation would include the\rmine portals, the escape raise, surface facility areas, and the site access road (the portion not needed for\rlong-term land use purposes).	Please clarify what portion of the site access road which will not be needed for long-term land use purposes and that Laramide will coordinate with CNF on how the roads will be reclaimed on NFS lands.
59	Geo3	38	2	2. 8 . 2 .4 Recontouring and Regrading	Waste rock materials removed from the underground operations do not represent any potential for acid\rrock drainage.	How was this statement determined? Please provide the reasoning and sources that determined the low potential for acid rock drainage.

60	Geo3	38	2	2. 8 . 2 .4 Recontouring and Regrading	This, coupled with the relatively low precipitation in the area and the proposed stormwater\rdiversion design around the waste rock storage area, would minimize the potential for pollutant release.	*What other practices besides the proposed stormwater diversion design would be utilized to minimize pollutant release from activities associated with the mining project? In addition, how would this be monitored throughout the mine project?
61	Geo3	39	2	2.8.2.6 Fertilizing, Mulching, and Seeding	Straw mulch or other approved stabilizing material would be applied to the growth medium material to\rreduce erosion, promote stabilization, and enhance seed germination.	Considering the velocity of winds that may occur in the project area, what other mulch besides the proposed straw mulch would be proposed for the project?
62	Geo3	40	2	2.11 Post Mining Acid or Other Toxic Drainage	Updated baseline data for the current project proposal is expected in\rsummer 2026.	Would the updated baseline data collection still be scheduled for summer of 2026 with the current update to the schedule?
63	Geo3	40	2	2.11 Post Mining Acid or Other Toxic Drainage	Testing to simulate metal leaching by precipitation found that, with few exceptions, metals were\rnot leached in amounts that exceeded accepted guidelines.	Please provide more information on the 'few exceptions' of the constituents that were analyzed during these leach experiments.
64	Geo3	41	2	2.12 Geotechnical Inspections and Observations	The site facilities, including excavation and fill placement, will be developed based on the\ravailable geological and hydrogeological information. Therefore, the potential for geotechnical risk has\rbeen mitigated.	How was the potential for geotechnical risk mitigated? Please provide the sources for this last statement and what geological and hydrogeological information this is based on. What geotechnical studies have been conducted on the project area?
65	Geo3	43	4	4.1.3 Hydrologic Balance	Underground mining operations would be limited to geologic formations that are above the regional\rgroundwater aquifer.	Though the underground mining operations is above the regional groundwater aquifer, more detail on the geologic formations between the mine operations and the surface in regards to the hydrologic balance is recommended. How far below is the regional aquifer in relation to the mine operations? There is not supporting evidence in the MORP that this is a dry mine such as past drilling results, nearby wells, etc. If water is encountered during underground development, what mitigations would be put in place? Will operations immediately stop and would Laramide have to reasses mine construction?
66	Geo3	43	4	4.1.3 Hydrologic Balance	Operations will not impact aquifers. The proposed mine would impact three\rephemeral arroyos in the permit area and disturb a limited area for its surface facilities, minimizing effects\rto the surface hydrologic balance.	Due to the fact that 3 ephemeral arroyos would be impacted, how would surface hydrologic balance effects be minimized?
67	Air	8	2	2.1 Phase 1--Underground Development Activities	Proposed mine development and mining technique details are described in the following sections. The underground development stage is anticipated to generate waste rock. Estimated volumes of waste rockare presented in Table 2-1.	Describe air quality and air quality protection measures for radioactive dust and the associated radiation. Monitoring of radioactive dust movement, if planned, should be included in the MORP too. Include: ore bays, ore pads, drill pads, roads, all rock and soil stockpiles. How is the mine assessing dust movement and radiation? "Nonoccupational radiation exposures to the general population can occur from airborne dispersal of radioactive particulates to off-site locations, including subsequent resuspension, or gases from mining operations, processing facility exhausts, waste rock, wastewater impoundments, or tailings. Exposures may also occur by release of contaminated water or leaching of radioactive materials into surface or groundwater sources where they may eventually end up in potable water supplies. Radon and its decay products can also be transported off-site, especially from tailings or waste areas, in the form of radon gas or radon decay products. The potential for internal radiation exposure from drinking water contaminated with radionuclides (e.g., 226Ra, 228Ra, 230Th, uranium) that have been leached or otherwise released from tailings or other wastes is a common health concern for the public (Landa and Gray, 1995; Baker, 2010). Another health concern for people living near mines and processing facilities is the potential for off-site radiation exposure from atmospheric deposition of ore or tailings dust (e.g., dust containing uranium, 226Ra, 230Th, 210Pb, 210Po, and other radionuclides). Even though such fugitive dusts are extensively diluted once they leave the plant or mine boundaries (Thomas, 2000), accumulation in the food chain can occur with subsequent human consumption of wild or domestic animal meat, fish, or milk."Reference: page 132 of National Academies of Sciences, Engineering, and Medicine. 2012. Uranium Mining in Virginia: Scientific, Technical, Environmental, Human Health and Safety, and Regulatory Aspects of Uranium Mining and Processing in Virginia. Washington, DC: The National Academies Press. https://doi.org/10.17226/9398.

68	Air	21		2.3.4 Surface Development Phase 4 Table 2-5 Surface Area of Disturbance	Portal Area (ventilation fan and compressor)1,2	Additional information is needed for air quality. To assess air quality impacts, the exact number of compressors, type and size of compressors, fuel, type, and operating hours are needed. The request would be to provide the estimated emissions (PM10, PM2.5, NOx, SOx, VOCs, HAPS, etc) from the compressors , vents, and all other equipment per year for each year of the project. This comprehensive emissions inventory would be documented in a table along with the maximum potential to emit in one hour, and one day. The consultant will also need to provide the assumptions and methods used to create that data, i.e. EPA AP42...It is also possible that the state of NM-Air Quality Division requires operating permits for the compressors, drill rigs, and anything that might remain stationary for awhile.
69	Air	22	2	2.4.2 Impoundments and Stormwater Control	Water in the upper pond would be used for operations and dust control in non-mining areas.	Clarify the use of water trucks for dust control. Add this information into an Air Quality section. Specifically, will dust control occur throughout the life of the mine including the reclamation? Will dust control occur on piles of excavated dirt? pads? fill material piles? Ore piles? storage of topsoil? access roads? areas where vegetation has been removed?
70	Air	23	2	2.4.2.1 Contact Water (Process) Pond	Given the activity associated with the waste rock and ore stockpiles (placement and removal of materials with heavy equipment), the use of a synthetic liner (i.e., HDPE) could result in ripping or tearing of the liner, impairing its purpose.	Will there be monitoring for movement of radioactive dust during operations and remediation closure such as bucket monitoring or PM or TSP monitoring? Dust fallout sampling measures the fallout of windblown settleable dust. Single bucket fallout monitors can be deployed following the American Society for Testing and Materials standard method for collection and analysis of dust fall (ASTM D1739). What other air monitoring will there be at the mine? The main sources of PM10 emission contributions are likely windblown dust, vehicle entrainment on unpaved roads, and operations. "Much of the dust caused by mining operations consists of fine particles that are generated from the mechanical disturbance of rock and soil, bulldozing, blasting, and vehicles traveling on dirt roads. Particles can also be mobilized by wind blowing over ore stockpiles. Radioactivity monitoring at the fenceline, as well as at selected off-site locations can be used to verify the modeling predictions about off-site contamination. The Mine Safety and Health Administration (MSHA) requires radon monitoring of exhaust air from underground uranium mines for the purpose of estimating worker exposure, but these measurements have application for offsite exposure assessments as well. Continuous monitoring for air emissions at the fenceline, including dust, radon, and radon progeny, is an accepted practice by industry (see Chapter 8 for a discussion of monitoring best practices). Reference: "Potential Environmental Effects of Uranium Mining, Processing, and Reclamation." National Research Council. 2012. Uranium Mining in Virginia: Scientific, Technical, Environmental, Human Health and Safety, and Regulatory Aspects of Uranium Mining and Processing in Virginia. Washington, DC: The National Academies Press. doi: 10.17226/13266. --- from main document: National Academies of Sciences, Engineering, and Medicine. 2012. Uranium Mining in Virginia: Scientific, Technical, Environmental, Human Health and Safety, and Regulatory Aspects of Uranium Mining and Processing in Virginia. Washington, DC: The National Academies Press. https://doi.org/10.17226/9398.
71	Air	26	2	2.4.7 Water Use and Management Table 2-6 Projected Water Use Estimates	Activity/Facility	Do any of these facilities by themselves or in conjunction with others require an air pollution permit from the State of NM?
72	Air	27	2	2.4.8 Storage Areas for Equipment, Vehicles, and Chemicals	2.4.8 Storage Areas for Equipment, Vehicles, and Chemicals	Recommend the company develop a wildfire communication plan that outlines procedures for contacting the incident command team at any wildfire incident nearby. This alerts the command team of uranium facilities nearby since firefighters may be placed anywhere around the fire perimeter including in and adjacent to the mine site. This also allows the mine to communicate to firefighters the locations and quantities of flamables and explosives. Coordinating fire suppression activities is essential if the mine is going to operate their own fire fighting team for on-site accidental fires. Additionally, wildfire and the associated winds can cause dust to become entrained and move long distances. Wildfire also can mobilize dust that has settled on vegetation and other surfaces. The movement of radioactive dust and heavy metals can create a hazard for anyone working in the area over a sustained period of time. Specifically, "Radiation exposures to the general population resulting from off-site releases of radionuclides (e.g., airborne radon decay products, airborne thorium-230 (230Th) or radium-226 (226Ra) particles, 226Ra in water supplies) present some risk. The potential for adverse health effects increases if there are uncontrolled releases as a result of extreme events (e.g., foods, fire, earthquakes) or human error. The potential for adverse health effects related to releases of radionuclides is directly related to the population density near the mine or processing facility.... Significant potential environmental risks are associated with extreme natural events and failures in management practices. Extreme natural events (e.g., hurricanes, earthquakes, intense rainfall events, drought) have the potential to lead to the release of contaminants if facilities are not designed and constructed to withstand such an event, or fail to perform as designed." Reference: page 6 "Summary" of National Academies of Sciences, Engineering, and Medicine. 2012. Uranium Mining in Virginia: Scientific, Technical, Environmental, Human Health and Safety, and Regulatory Aspects of Uranium Mining and Processing in Virginia. Washington, DC: The National Academies Press. https://doi.org/10.17226/9398.) Several wildfires occurred near or within uranium facilities in 2025 in multiple western states. The Forest Service developed its own communication protocols specifically for wildland fire personnel working in contaminated areas.

73	Arc	10	2	2.1.3 Escape Raise	A small diameter drill hole would be drilled from the surface to the selected area underground and then "pulled" back to the surface, allowing underground rock to fall into the underground workings. From there, it would be removed, hauled to the portal, and placed in the surface waste rock stockpile.	Clarify that all waste rock generated from the escape raise - not just from drilling the pilot hole - would fall into the underground workings.
74	Arc	10	2	2.1.3 Escape Raise	To provide additional underground safety (i.e., both ventilation and secondary escape), Laramide proposes to install an escape raise on the north side of the “Dena Rich” mineralized zone.	Describe the ventilation fans and associated noise levels, either here or somewhere else in the document, i.e. 2.4.11.4 Ventilation Facilities.
75	Arc	26	2	2.4.7 Water Use and Management	Underground operations and drilling would require water for dust control, removal of drill cuttings, and cooling of drill bits.	What happens to the water used in the mine that comes into contact with uranium-bearing rock? Is there treatment?
76	Arc	32	2	2.4.11.4 Ventilation Facilities	Smaller secondary booster fans may be placed underground to increase ventilation. This may include a booster exhaust fan near the bottom of the escape raise. These secondary fans would assist in directing ventilation to and from working areas.	What can be expected as far as noise at the top of the escape raise from the fans?
77	Arc	32	2	2.4.11.4 Ventilation Facilities	Smaller secondary booster fans may be placed underground to increase ventilation. This may include a booster exhaust fan near the bottom of the escape raise. These secondary fans would assist in directing ventilation to and from working areas.	What particulates can be expected to be in this air, especially if it is being pushed out from inside the mine?
78	Arc	32	2	2.4.11.4 Ventilation Facilities	Smaller secondary booster fans may be placed underground to increase ventilation. This may include a booster exhaust fan near the bottom of the escape raise. These secondary fans would assist in directing ventilation to and from working areas.	Will air be pushed out or pulled in through the escape raise?
79	Arc	32	2	2.4.11.5 Power Supply	Above- or below-ground service to the mine would then be constructed.	We need more description of either option, or at least, confirmation that the above or below ground service will be within the haul road corridor without additional disturbance being needed. Also, if the power will be above ground to provide general description for a analysis on visual impacts.
80	Arc	32	2	2.4.11.7 Communications	Laramide would install telephone and Internet communications to the site using area providers.	Will you be running hardlines or using cellular service to the mine site? Please describe the components of how this will be accomplised.
81	Arc	33	2	2.4.11.8 Outdoor Lighting	Lighting would meet applicable night sky standards and minimize light pollution impacts on nocturnal wildlife.	Please describe in more detail the applicable night standards Laramide is proposing to be complying with, as it will affect the visual impacts of the Mt Taytor TCP as well.
82	Arc	37	2	2.8.2.3 Portal and Escape Raise Closure	The escape raise would be closed.	Clearly address that all activities (equipment, laydown, etc.) to open and close the escape raise. Would this all be able to occur within the fenced area? If it won't, describe the area it will require.

83	Arc	43	4	4.1.2 Cultural Resources	Laramide expects to become a signatory to and comply with a Memorandum of Understanding to identify and address effects, define roles, and define mitigation responsibilities associated with historic properties such as the Mount Taylor TCP and eligible sites.	Please edit this sentence to be a "Memorandum of Agreement".
84	Arc	46	4	4.1.8.1 Mining Beneath Perennial Streams	There would be no mining beneath perennial streams, as none are located in the permit area	This should be re-worded. Mining would occur far outside the mine permit area. Suggest removing "as none are located in the permit area." and replace with "as none are located above underground operations."
85	Arc	37	2	2.8.2.3 Portal and Escape Raise Closure	A reinforced concrete slab would be placed over the borehole on firm bedrock and anchored into solid bedrock.	Text states a concrete slab would be used; Figure 2-9 shows either concrete or steel. Please make these match.
86	Arc	37	2	2.8.2.3 Portal and Escape Raise Closure	Growth material (estimated at 12 inches) will be spread on top of the rock fill, and the site will be seeded with the mixture presented in Table 2-8.	Text says 12 inches, Figure 2-9 shows 6 inches. Please make them match.
87	Bio	6	2	2 Overview of Mining Operations	An escape raise, which would provide ventilation and an emergency escape route from the underground mine workings, would be located on the surface of La Jara Mesa, generally atop the uranium deposits (see Figure 2-1).	Will there be a fan lacated at the top of the escape raise?
88	Bio	11	2	2.1.5 Underground Support Services	Two drill rigs are proposed for underground long hole drilling, each supplied with compressed air, fresh or recycled water, a drain line, and electricity. Water is expected to be required for lubrication.	Where is this water coming from, how much will be used, and where will waste water be stored and/or disposed of? Will it be treated, and how? Are there uncovered storage tanks or ponds that will regularly hold water? If so, what is the plan to prevent incidental wildlife drowning?
89	Bio	30	2	2.4.9 Topsoil Handling	This application rate may be revised, as appropriate, based on growth medium nutrient sampling and future recommendations from a qualified soil scientist and/or soils laboratory.	Include a statement that a agencies will review and approve any changes based sampling results.
90	Bio	31	2	2.4.11.1 Site Access	However, no need to construct improvements has been identified.	What is the expected frequency of mine-related travel on this road? If it is significant, a road maintenance plan may be needed.
91	Bio	32	2	2.4.11.4 Ventilation Facilities	The primary ventilation fan would be located at the surface portal facilities.	What is the noise threshold of the primary ventilation fan?
92	Bio	32	2	2.4.11.5 Power Supply	Power needed for mine operations would be obtained from a local provider. Above- or below-ground service to the mine would then be constructed.	Please provide a map showing where electrical lines be routed/located. If they are above ground, they should comply with these BMPs to reduce avian collisions and mortalities due to overhead power lines and associated infrastructure: https://www.aplic.org/documents. If they are buried lines, what disturbance corridor (width/buffer) would be associated?
93	Bio	32	2	2.4.11.6 Compressor Facility	They would be protected from the weather in a structure enclosed with siding to muffle sound.	What is the expected decibel range expected with this compressor muffled?
94	Bio	32	2	2.4.11.7 Communications	Laramide would install telephone and Internet communications to the site using area providers.	Where would these lines be located on their route to the mine? Will they be above ground or buried? Please provide a map showing where lines be routed/located. If they are above ground, they should comply with these BMPs to reduce avian collisions and mortalities due to overhead lines and associated infrastructure: https://www.aplic.org/documents. If they are buried lines, what disturbance corridor (width/buffer) would be associated?
95	Bio	33	2	2.4.11.10 Security and Fencing	A four-strand barbed wire perimeter fence would be installed around the La Jara Mesa Project surface facilities area.	What is the goal for fencing the perimeter? If it is meant to also keep out large ungulates, it would need to be at least 8 ft. It would need to be mesh wire at the bottom half if it were also to keep out smaller wildlife.

96	Bio	33	2	2.5 Wildlife Mitigation and Contingency Plan	Fencing would be installed around the surface facilities area and escape raise to prevent access by livestock and to limit wildlife access.	Does the operator want to limit wildlife access or exclude it? If exclude, see comment 10 about fencing recommendations.
97	Bio	33	2	2.5 Wildlife Mitigation and Contingency Plan	If electric transmission or distribution power poles are needed, they would include electrocution prevention features to protect raptors.	Electrocution is not the only danger to birds. Collisions with power lines and guy lines is also an issue. If installing overhead powerlines, use these BMPs: https://www.aplic.org/documents
98	Bio	34	2	2.5 Wildlife Mitigation and Contingency Plan	Site clearing and grading would occur outside of the general migratory bird nesting season, or preconstruction surveys would be provided to identify occupied nests on the site for avoidance or permitting. Timing restrictions applicable to raptor nesting may be imposed based on baseline data.	What dates are you using for "general migratory bird nesting season"? This nesting window it quite large for some migratory birds. I recommend narrowing the list of migratory birds to what is likely to occur in/near the project area.
99	Bio	36	2	2.8.1 Construction Reclamation	Control measures that may be implemented include hand-pulling, hand-digging, and biological control to prevent and restrict the spread of noxious weeds.	The FS does not typically use biological methods to control noxious weeds. More often, mechanical removal or chemical treatment with approved herbicides is used. If the use of chemicals is included in the proposal, please specify that.
100	Hyd1	6	1	1 Introduction Map 1-2 Topography of the Proposed Permit Area	Map 1-2 Topography of the Proposed Permit Area	Please include either in an existing figure or as a new separate figure landownership for the project area.
101	Hyd1	6	1	1 Introduction Map 1-2 Topography of the Proposed Permit Area	Map 1-2 Topography of the Proposed Permit Area	Why is the permit area related to the primary mining operations truncated through the bottom center of the polygon? Is the intent to exclude the bottom portion of the polygon? There is a descrepency between this polygon and the provided disturbance/facility GIS that was provided. Please ensure consistancy throughout figures, GIS, and plan descriptions.
102	Hyd1	6	1	1 Introduction Map 1-2 Topography of the Proposed Permit Area	Map 1-2 Topography of the Proposed Permit Area	Please include a figure depictiong the access route that will be taken from the main mine facility to the emergency escape raise at the top of La Jara Mesa.
103	Hyd1	7	2	2 Overview of Mining Operations Figure 2-1 Subsurface Geology of the Proposed Permit Area	Figure 2-1 Subsurface Geology of the Proposed Permit Area	Which of these formations is likely to include groundwater flows? While it appears the bulk of the mineralized zone is located in the brushy basin formation, it appears the shafts and raise will transect the westwater and lower formations. Are these water-bearing aquifer zones? What testing and sampling has been conducted to determine aquifer formations affected by mining activities? Also, please provide clearer figures with more legible text.
104	Hyd1	9	2	2.1.1 Portal Face-Up and Excavation Table 2-1 Development Stage Waste Rock Volumes	Muck Bays (along inclines)3 20 x (30' x 12' x 15') 108,000 4,000	What sampling/testing of this waste rock will be conducted to determine its characterization and safety for use as bench fill? What are the drainage, ore/stockpile storage, and stormwater management plans during these operations since there are no ponds, ditches, or other features that seem to be constructed at this stage? How will this preliminary phase address erosion, sediment control, and possible issues with contact stormwater?
105	Hyd1	9	2	2.1.1 Portal Face-Up and Excavation Table 2-1 Development Stage Waste Rock Volumes	Assume 100 drill stations at various locations along the development laterals. These are also used as temporary muck stations. Drill stations will be about 30 feet long.	Since these muck stations are considered waste rock but likely could be mixed with mineralized materials during drilling, will they sampled and stored following standards for hazardous and radioactive waste? Is there any way for to keep muck station waste from intermixing with other mineralized ore stockpiles? How would separation occur?
106	Hyd1	10	2	2.1.2 Incline Excavation	2.1.2 Incline Excavation	What is the plan should groundwater or aquifer formations be intercepted? How will groundwater quality be protected and intermixing be avoided? What measures would be implemented to address and groundwater inflows?

107	Hyd1	10	2	2.1.2 Incline Excavation	Underground front-end loaders would deliver broken rock to specially designed underground trucks for delivery to the surface, where it would be used for the construction of the surface pad. The	Since other sections seem to imply this waste rock could be comprised of mineralized materials, what is the sampling/testing frequency proposed to ensure the constructed pad is not comprised of radioactive materials? This pad itself likely will need to have all stormwater runoff contained and directed to a location designed to treat toxic and radioactive runoff.
108	Hyd1	11	2	2.1.3 Escape Raise	The dimensions of the surface area to be used for escape raise facilities will be approximately 50 by 100 feet, or approximately 0.1 acre.	Does this acreage reflect the total disturbance for all of the proposed construction, drilling, infrastructure, fuel storage, ventilation equipment, parking, site access, and operational footprint for development, operation, and reclamation of all mining activities at this shaft? There is no clear drawing for features at this location.
109	Hyd1	11	2	2.1.3 Escape Raise	A diesel generator with associated fuel storage would be located at the escape raise.	What is the proposed size and operational duration of this generator? Will it have any type of noise reducing design features?
110	Hyd1	11	2	2.1.3 Escape Raise		Please include Forest Service Road 544 as an access road for the project. Describe the activities that will occur on this road for construction of th escape raise.
111	Hyd1	11	2	2.1.5 Underground Support Services	One objective of underground development work is to collect information about uranium mineralization at the site. This is done using gamma probes that are inserted into long-hole drill holes. Underground drilling would be conducted from drill stations in laterals beneath the expected mineralized zones. Approximately 75 to 100 individual underground drill holes are expected. These would be drilled at various angles to lengths ranging from 250 to 500 feet.	How will drilling, incline, raise, and shaft construction interact with groundwater or aquifers in the project area? How will formation and aquifer mixing be avoided or minimized during these operations?
112	Hyd1	11	2	2.1.5 Underground Support Services	Two drill rigs are proposed for underground long hole drilling, each supplied with compressed air, fresh or recycled water, a drain line, and electricity. Water is expected to be required for lubrication. Any used oils, residue, or waste from drilling would be disposed of in a permitted off-site facility	What is the proposed source of the water used, and how will water for disposal be collected during operations? Where will the drain lines discharge to? What type of equipment cleaning and spill prevention will be implemented for this equipment? What offsite facility would be used for these underground equipment operations, and is that the same or different than the surface maintenance disposal?
113	Hyd1	14	2	2.1.5 Underground Support Services Figure 2-4 Escape Raise Map and Cross-Section	Figure 2-4 Escape Raise Map and Cross-Section	What are the criteria for installing shotcrete in the escape raise, and would using this better reduce any groundwater interflow or contamination?
114	Hyd1	14	2	2.1.6 Bulk Sampling	Bulk samples would be temporarily stored on the surface of a compacted clay liner on the waste rock dump prior to transport to the mill for testing. Haulage of material to off-site testing facilities would be conducted periodically to eliminate the need for a large stockpile.	Please provide additional details on the design of bulk ore sample cells in the waste rock facility to include stormwater management, water quality monitoring and dust abatement. What is the proposed disposition of runoff from bulk sample cells? Will these cells be temporary and abandoned once full production begins, or will they be maintained?
115	Hyd1	16	2	2.2 Phase 2—Underground Mine Production	Mined-out areas would be backfilled with waste rock (uneconomic) material to minimize the amount of waste rock hauled to the surface.	Would any characterization or sampling be conducted prior to backfill? What type of contact with groundwater is anticipated? How will these activities affect GW in these formations, and what PDCs or BMPs would be implemented to reduce potential for intermixing and contamination?

116	Hyd1	17	2	2.3.1 Surface Development Phase 1	Implement stabilized entrances at access points to reduce sediment tracking off-site	Are further details provided in the SWPPP? Later it does not appear that stormwater management through all phases of bench installation and mine development have been developed or indicated in drawings.
117	Hyd1	17	2	2.3.1 Surface Development Phase 1	Construct temporary ditches or berms to divert clean runoff around the disturbed area and access road, minimizing contact with exposed soils	The water quantity and water quality design storms and hydraulic design details of these features need further clarity. The figures are difficult to read, and the capacity, function, hydrologic and hydraulic interface within and between the operational areas and the surrounding landscape are unclear. If there is stormwater run-on from proximate CERCLA sites, will there be upgradient water quality monitoring and gaging to determine conditions prior to site inundation? How will the hydrologic/hydraulic functions of the existing arroyos be protected and restored? Are upgradient, mid-, and down-gradient features within these arroyos proposed in order to provide better channel stability, sediment, and erosion control, such as zuni bowls, one-rock dams, or other similar features as waters move onto and through the mining operational area? At the receiving channels downstream of these constructed features, what type of erosion control and channel stability features are proposed. What type of water quality monitoring and sampling will be done at the discharge locations?
118	Hyd1	17	2	2.3.1 Surface Development Phase 1	Construct a pad at 7275 feet (msl) of cut material and waste rock at the portal site of the inclines	What sort of sampling, monitoring, and mineral characterization will occur for this pad construction, particularly if there is a chance of mineralized, radioactive or toxic materials comprising this pad foundation? How will air and water quality be monitored before and throughout operations to ensure this pad is not discharging or emitting toxic or radioactive water or gases? Will the pad be entirely composed of waste rock, or will additional materials be brought in from the outside? Will any of this rock be used for road access fill?
119	Hyd1	18	2	2.3.1 Surface Development Phase 1	The upgrade will remain within the planned property limits along the route and will accommodate all drainage and floodplain considerations identified during the final hydraulic and hydrology modeling.	Where are the property limits indicated in the figures? When will modeling be completed that is necessary to determine design and construction feasibility?
120	Hyd1	18	2	2.3.2 Surface Development Phase 2	Extend 7,275 feet of waste rock stockpile to the south using development waste rock Planned disturbance of 9.3 acres (2.0 acres additional from Phase 1)	Provide additional detal about WRS expansion, for example: Does this mean the drainage ditches and stormwater management would then be reconstructed around the new pad? How will water be managed and routed during the expansion transition? Will new lined pits and channels be constructed?
121	Hyd1	18	2	2.3.2 Surface Development Phase 3	Expand BMP installation to encompass all new disturbances--this will accommodate runoff from the entire developed site at this phase	Does this imply that prior to this stage NOT all runoff was captured or treated? Does this mean the drainage ditches and stormwater management would be reconstructed again around the new Stage 3 pad, or is Stage 3 the only stage withstormwater capture and containment? Is there full stormwater capture and containment at any stage? How will water be managed and routed during each expansion transition? Will new lined pits and channels be constructed each time?
122	Hyd1	18	2	2.3.4 Surface Development Phase 4	Continue to build the 7,275-foot portal pad with development waste rock (waste rock dump reaches 266,740 cubic yards)	Please update the MORP to include details of proposed stormwater management, water quality monitoring, and dust abatement for each phase of surface development, and final buildout.
123	Hyd1	19	2	2.3.4 Surface Development Phase 4 Figure 2-5 Preliminary Site Development Plan, Phase 1	Figure 2-5 Preliminary Site Development Plan, Phase 1	If the plan is to completely fill the existing arroyos running through the center of the eventual multi-stage operations pads, first one half side/bank (Phase 1), then the other (Phase 2), what type of geotechnical studies have been completed to ensure there are adequate cut fill ratios and that the base of the operational pad won't be washed out or undermined by subsurface or surface flows that are not adequately captured by the upgradient diversion channel? Will this operating pad have some sort of top layer fill so that any stormwater or inflow does not simply infiltrated through the pad and back into the infilled natural drainage channel ?
124	Hyd1	19	2	2.3.4 Surface Development Phase 4 Figure 2-5 Preliminary Site Development Plan, Phase 1	Figure 2-5 Preliminary Site Development Plan, Phase 1	Additionally, it is difficult to tell where access roads will be located relative to ditches and berms for stormwater. How/where do the ditch and roadways intersect? It appears they may overlap? If there are not planned roads to the growth medium stockpile, how will it be accessed?
125	Hyd1	19	2	2.3.4 Surface Development Phase 4 Figure 2-5 Preliminary Site Development Plan, Phase 1	Figure 2-5 Preliminary Site Development Plan, Phase 1	it is difficult to discern how the grading and possible diversion ditch construction here corresponds with the depictions in later plan sheets 102, 103, etc. Is the linear feature at the northeast end a berm, a road, a ditch, or does it function as all 3? The grading and staging of diversion flows, stormwater channels, etc. is unclear.

126	Hyd1	19	2	2.3.4 Surface Development Phase 4 Figure 2-6 Preliminary Site Development Plan, Phase 4	Figure 2-6 Preliminary Site Development Plan, Phase 4	What is the feature that aligns with the arroyo that bisects the proposed mine pad of operations? Is it a road, or some other diversion feature from upgradient where it appears to originate? Is it planned to use or decommission this feature during these early phases?
127	Hyd1	19	2	2.3.4 Surface Development Phase 4 Figure 2-5 Preliminary Site Development Plan, Phase 1	Figure 2-5 Preliminary Site Development Plan, Phase 1	In other figures, it also appears there is some sort of road, or other feature associated with this drainage that will eventually be filled under the center of the operations pad. It is unclear how this feature will be incorporated or how its continuity will be affected by the pad fill.
128	Hyd1	20	2	2.3.4 Surface Development Phase 4 Figure 2-8 Preliminary Site Development Plan, Phase 4	Figure 2-8 Preliminary Site Development Plan, Phase 4	How will percolation and leach field in the proposed septic system interact with the drainage ditch from Phase 3, the intercept with the drainage ditch from phase 1, and the phase 4 treatment ponds? How will septic movement into the phase 3 drainage be avoided? What type of testing and monitoring is proposed, especially considering the septic is likely to receive radioactive contamination from cleaning of personnel PPE
129	Hyd1	20	2	2.3.4 Surface Development Phase 4 Figure 2-8 Preliminary Site Development Plan, Phase 4	Figure 2-8 Preliminary Site Development Plan, Phase 4	The proposed treatment ponds appear to be located within the existing contours of the naturally occurring arroyo and intersect the unidentified feature. How will these ponds be constructed so that they do not intermix with the remaining natural hyporheic flows that are likely to continue subsurface from the upgradient drainage?
130	Hyd1	20	2	2.3.4 Surface Development Phase 4 Figure 2-8 Preliminary Site Development Plan, Phase 4	Figure 2-8 Preliminary Site Development Plan, Phase 4	It does not appear these ponds in Phase 4 will be capturing any of the stormwater flows from any of the pads other than the one constructed in Phase 3, and possibly phase 2. What are all the areas these ponds are meant to treat? What areas, stockpiles, and pads and will not have any diversion into the ponds? What is the proposed water quality and water quantity design storm that was used? What treatment methods are proposed besides evaporation?
131	Hyd1	21	2	2.3.4 Surface Development Phase 4 Table 2-5 Surface Area of Disturbance	4) The escape raise surface area will be accessed by Forest Road 544. Laramide does not plan any upgrades to this road.	Please indicate this on the figures and describe what type of regular maintenance would be implemented over the life of the operations and reclamation. Will gates, barriers, cattle guards or any other features be constructed on these access roads? How will BMPs and crossing maintenance be addressed to ensure stable road hydrology is maintained over the lifetime of use?
132	Hyd1	21	2	2.3.4 Surface Development Phase 4	Over the life of the project, surface disturbance would be limited to the extent necessary to construct surface development of the mine, improve access and haul roads, construct the escape raise, and make improvements to bring water and power to the site, within the 96 acre permit area.	*What is the proposed source and annual and total amount of water proposed for use at the site? Different parts of the narrative seem to point to different sources, including contact stormwater. What are all activities the water would be used for? Where is the water infrastructure detailed on the figures and plan sheets? Where are details about the power capacity and infrastructure being brought to the site?*
133	Hyd1	21	2	2.3.4 Surface Development Phase 4	Over the life of the project, surface disturbance would be limited to the extent necessary to construct surface development of the mine, improve access and haul roads, construct the escape raise, and make improvements to bring water and power to the site, within the 96 acre permit area.	Suggest including a section in the MORP of comprehensive road information. For example, Clarity and specifics are needed about which roads will have what treatments, and what will be their final disposition. Will access and haul roads be decommissioned per NFS standards?
134	Hyd1	21	2	2.3.4 Surface Development Phase 4 Table 2-5 Surface Area of Disturbance	1) The portal area will be accessed by approximately 5.7 miles of existing roads (3.7 miles on private property, 2 miles on Forest Road 450, and 0.5 miles on an unnumbered forest road).	Please indicate this access on the figures and describe what type of regular maintenance would be implemented over the life of the operations and reclamation. Will gates, barriers, cattle guards or any other features be constructed on these access roads? How will BMPs and crossing maintenance be addressed to ensure stable road hydrology is maintained over the lifetime of use? Typically an un-numbered road is not a system road, so it is likely this could be a user-created road that does not meet NFS standards and would need upgraded to meet standards.

135	Hyd1	22	2	2.4.2 Impoundments and Stormwater Control	Diversions would be constructed to divert potential run-on stormwater from the surrounding landscape upgradient of the mine.	What is the road/linear feature located within/adjacent to the middle bisecting drainage and running both up and down-gradient from the proposed fill in that drainage channel? Will it be removed, replaced, relocated? What is its current function and how will it be addressed through each phase of mine development and operation?
136	Hyd1	22	2	2.4.1 Leach Pads, Heaps, Ore Dumps, and Stockpile	Mineralized uranium material (bulk samples) removed during underground development work would be stockpiled on a flattened, clay-lined surface next to the portal, then loaded onto highway trucks for transport to off-site mills. The	Please provide design details for the ore stockpile liner system.
137	Hyd1	22	2	2.4.1 Leach Pads, Heaps, Ore Dumps, and Stockpile	A truck scale will be located adjacent to the ore pile and the contact water pond	The pond shown in the design drawings adjacent to the truck scale is labelled as a process water pond - is this the pond being referred to here? Is this contact water pond meant to collect all stormwater from all of the pad operational areas and stockpiles? Given that this collection pond is located in the middle of the existing arroyo, how will the proposed design interact with subsurface flows moving down the drainage?
138	Hyd1	22	2	2.4.2 Impoundments and Stormwater Control	Diversions would be constructed to divert potential run-on stormwater from the surrounding landscape upgradient of the mine.	What is the estimated baseline volume of water and materials transported through these natural drainages that bisect the proposed mining operations site?
139	Hyd1	22	2	2.4.2 Impoundments and Stormwater Control	Diversions would be constructed to divert potential run-on stormwater from the surrounding landscape upgradient of the mine.	For these drainages, are any other instream or upland structures proposed up or downstream from the diversion interception to ensure channel and hillslope stability, for example Zuni bowls, one rock dams, plantings, or any other slope stabilization methods?
140	Hyd1	22	2	2.4.2 Impoundments and Stormwater Control	Runoff from the disturbed surface facilities area and the waste rock stockpile would be directed toward a 4.9-acre-feet, 2-stage contact stormwater basin at the downgradient end of the mine property. The upper portion of this pond (1.5 acre-feet) would be lined to maximize water retention for operational use, and the lower portion of the pond (3.4 acre-feet) would be sized to manage large storm events and control downstream release. Water in the upper pond would be used for operations and dust control in non-mining areas. Water in the lower pond would be allowed to evaporate, percolate into the ground, or be used in site dust control (Figure 2-2 or C-102 in the design set). To appropriately design and size these controls, precipitation records and models were evaluated using a hydrologic model.	Based on this description and the figures, it is unclear whether any water quality treatment or separation of water in contact with ore stockpiles is proposed for site stormwater, including contact stormwater that is likely to have concentrations of dissolved toxic and radioactive constituents. How will water in these stormwater ponds, both lined and unlined, be sampled and tested to ensure it is safe for any land application, dust abatement, or other uses? If retention for reuse is proposed in the lined pond, how will pollutants and sediments be treated and removed?
141	Hyd1	22	2	2.4.2 Impoundments and Stormwater Control	Diversions would be constructed to divert potential run-on stormwater from the surrounding landscape upgradient of the mine.	What are the designs for these diversions? Are they ditches, berms, or both? Are they lined? What is their capacity? From the figures it appears the constructed diversion channels are meant to intercept run-on flows from the upgradient channels that run through the middle of the processing area, and the interception points will be at nearly perpendicular angles to the insitu drainage channels. How will both the surface and subsurface flows in these drainages be captured sufficiently to avoid their intermixing, inundation, and undermining of the constructed pad and SW pond features, infrastructure, etc.? How will the proposed location of the bulk of the operations not be washed down the drainages and slopes? In other portions of the narrative and figures it does not seem that these critical design pieces have been developed. It is difficult to determine the scale and feasibility of the site design when water management will be critical to maintaining site stability and contact water containment.

142	Hyd1	23	2	2.4.2.1 Contact Water (Process) Pond	This contact water pond on the upper bench has been designed to accommodate the contact water runoff generated in the ore stockpile catchment under conservative, multi-day design storms, specifically a 7.5-inch, 100-year, 45-day event and an 8.1-inch, 200-year, 45-day event.	Is water meant to remain in this pond for 15 days or more after an event, based on the narrative column in Table B-2? If water is meant to remain in this pond, what protections will be put in place avoid contamination contact to birds or wildlife in the area?
143	Hyd1	23	2	2.4.2.1 Contact Water (Process) Pond	Evaporation was explicitly incorporated into the design basis by applying seasonal pan evaporation rates over the pond surface area during the non-monsoon period (approximately September through May) and combining this with a continuous process water withdrawal of about 10 gallons per minute for underground operations. Using this approach, the annual precipitation and evaporation water balance demonstrates that the process pond can store up to 1 year of stormwater inflows from the ore stockpile under the conservative storm sequence assumptions and be drawn down by operational reuse prior to the onset of the subsequent monsoon season. Runoff into this process pond will only be allowed to evaporate or will be returned underground for use in operations and dust control.	What is the proposed maintenance and maintenance schedule for the sludge and sediment build up in this pond and others?
144	Hyd1	23	2	2.4.2.2 Two-Stage Stormwater Contact Pond	The MSGP stormwater pond was sized similarly to the process pond, considering successive monsoon and wet seasons. This pond has a total design capacity of 209,000 cubic feet (4.8 acre-feet) and will be used for both dust control and additional percolation from the unlined portion to discharge expected volumes from successive storms. The two-stage configuration allows operational water storage to be maintained in the upper, lined portion, while providing maximum storm containment in the lower, unlined portion.	Clarify inpust to the MSGP pond, for example: Is this pond receiving any water from ore pond upgradient? There appears to be some sort of pipe, drainage or connection from the processes water pond. What is that feature? Is this MSG pond receiving contact runoff water from the parking lots, fuel depot, machine shop, or other facilities?

145	Hyd1	23	2	2.4.2.2 Two-Stage Stormwater Contact Pond	The MSGP stormwater pond was sized similarly to the process pond, considering successive monsoon and wet seasons. This pond has a total design capacity of 209,000 cubic feet (4.8 acre-feet) and will be used for both dust control and additional percolation from the unlined portion to discharge expected volumes from successive storms. The two-stage configuration allows operational water storage to be maintained in the upper, lined portion, while providing maximum storm containment in the lower, unlined portion.	Given the upgradient proximity of the septic leach field, how is that feature expected to interact with or intercept the stormwater flows being routed to the MSGP pond located downgradient?
146	Hyd1	23	2	2.4.2.2 Two-Stage Stormwater Contact Pond	The MSGP stormwater pond was sized similarly to the process pond, considering successive monsoon and wet seasons. This pond has a total design capacity of 209,000 cubic feet (4.8 acre-feet) and will be used for both dust control and additional percolation from the unlined portion to discharge expected volumes from successive storms. The two-stage configuration allows operational water storage to be maintained in the upper, lined portion, while providing maximum storm containment in the lower, unlined portion.	How will both stages of the pond interact with the existing drainage arroyo bisecting the proposed location, particularly since there seems to be a segment of this drainage proposed for some sort of additional drainage work upstream of the pond inlet? What is the water quality character and flow range of the water in the existing natural channel, and how will that additional flow affect the capacity of the ponds proposed within this drainage channel? In particular, how will the stormwater flow interact with any intercepted groundwater or subsurface flows within this portion of the natural channel, particularly since the bottom portion of the pond is meant to allow untreated stormwater to percolate through? How will these ponds not be washed away or undercut by the existing hydrologics and hydraulics of the surrounding landscape?
147	Hyd1	23	2	2.4.2.2 Two-Stage Stormwater Contact Pond	The MSGP stormwater pond was sized similarly to the process pond, considering successive monsoon and wet seasons. This pond has a total design capacity of 209,000 cubic feet (4.8 acre-feet) and will be used for both dust control and additional percolation from the unlined portion to discharge expected volumes from successive storms. The two-stage configuration allows operational water storage to be maintained in the upper, lined portion, while providing maximum storm containment in the lower, unlined portion.	Since this pond is also receiving untreated contact stormwater, how will it be sampled, tested, and treated to ensure that it is not discharging these pollutants when it is percolating into the groundwater table and underground receiving aquifers, or that it is safe to use for dust abatement and other land application?

148	Hyd1	23	2	2.4.2.1 Contact Water (Process) Pond	Evaporation was explicitly incorporated into the design basis by applying seasonal pan evaporation rates over the pond surface area during the non-monsoon period (approximately September through May) and combining this with a continuous process water withdrawal of about 10 gallons per minute for underground operations. Using this approach, the annual precipitation and evaporation water balance demonstrates that the process pond can store up to 1 year of stormwater inflows from the ore stockpile under the conservative storm sequence assumptions and be drawn down by operational reuse prior to the onset of the subsequent monsoon season. Runoff into this process pond will only be allowed to evaporate or will be returned underground for use in operations and dust control.	How much water is needed per anum and for the lifetime of the mine for underground operations? This is the first mention of water for underground operations. Given the likely contaminated nature of this process water, how would its use underground be protective of groundwater and surface waters it would come into contact with? Where would this used process water end up during the underground operations?
149	Hyd1	24	2	2.4.2.2 Two-Stage Stormwater Contact Pond	Emergency Spillway Peak Flow: 100-year/24-hour	Is this spillway design only applicable at the MSGP lined pond, or unlined pond? What was the emergency spillway peak flow design for the process pond? Was that the 200-yr 45-day event?
150	Hyd1	24	2	2.4.2.2 Two-Stage Stormwater Contact Pond	Internal Ditches Peak Flow: 25-year/6-hour (1.76 inches of precipitation) Diversion Ditches Peak Flow: 100-year/6-hour (2.24 inches of precipitation)	What is the purpose and design of each of these ditches and ditch types? Please provide clearer, better labeled, and more detailed plans and drawings. Other portions of the narrative seem to indicate these design storms and ditch capacity have not been modeled or determined. In some cases it looks as if these ditches are meant to intercept contact flows from the ore stockpile at the portal. However, it also appears some of these ditches could either bypass the MSGP pond, or could be diverted into the pond. It is unclear if some of these ditches are being constructed to reduce contact/run-on to the site, but in other cases it looks like they may be used to collect water in the MSGP ponds. In all cases, it does not appear any water quality treatment is being proposed other than flow detention and attenuation. This is particularly concerning since some of these channel appear to penetrate the safety berms at the ore stockpile which ostensibly help to keep radioactive toxic contact water separated from stormwater and runon from other areas of the mining operations. What separation and water quality treatment methods are proposed for water being discharged away from or reused onsite? What water quality standards and parameters are proposed, and what are the criteria thresholds for use? The rationale and design of surface and subsurface flow management on, around, and through the site is unclear and concerning.
151	Hyd1	24	2	2.4.2.2 Two-Stage Stormwater Contact Pond	Culverts Peak Flow: 100-year/24-hour or 10-year/24-hour (1.8 inches of precipitation) with a 24-inch-diameter culvert as a minimum size	Would the 100-yr or 10-yr event be used to size the culverts? If a 10 yr event is used, what is the anticipated depth of inundation over the roadway when uranium ore is being hauled out? What factor of safety was used for determining crossing sizing on the haul routes?
152	Hyd1	24	2	2.4.2.2 Two-Stage Stormwater Contact Pond	Construction Sediment Basins Volume: 2-year/24-hour storm, or 3,600 cubic feet for per acre of drainage	Where are these construction sediment basins located relative to the other MSGP, process pond, and diversion channels that are mentioned? What is the function of these basins relative to the other features that have been mentioned? Why are they not reflected on any of the drawings and figures?
153	Hyd1	24	2	2.4.2.2 Two-Stage Stormwater Contact Pond	This would be achieved by performing routine inspections and preventive maintenance of stormwater drainage systems, source controls, treatment systems, and plant equipment and systems that could fail, resulting in discharges of pollutants via stormwater.	Besides attenuating a certain design storm, what type of water quality treatment and to what effluent standards is being proposed? What plan, source controls, equipment, or other systems would be implemented besides detention ponds and percolation of untreated potentially contact-hazardous stormwater? There has been no mention of pond maintenance, liner inspections, offsite sludge disposal, etc. It is unclear how pond capacity or effluent treatment would be maintained over the life of the operations.
154	Hyd1	24	2	2.4.3.1 Sewage Disposal	Sewage waste will be disposed of via a septic tank and leach field system. The waste disposal system would be connected to the project facility trailers or buildings.	Given this septic waste is likely to come into contact with radioactive PPE from personnel, how will the septic system and leach field be monitored to ensure radio active waste is not being percolated into the groundwater or subsurface flows of the adjacent drainages?

155	Hyd1	25	2	2.4.3.1 Sewage Disposal	During initial construction and underground development work, sanitary waste would be collected in a system of portable chemical toilets, periodically cleaned and emptied, and transported off-site for disposal by a contractor.	How will PPE decontamination be addressed during this phase?
156	Hyd1	25	2	2.4.3.2 Solid Waste Disposal	2.4.3.2 Solid Waste Disposal	Please update to clarify that waste disposal containers will be designed and managed to wildlife-proof.
157	Hyd1	25	2	2.4.7 Water Use and Management	Storage tanks may be used to store and collect water.	Please update to clarify potential water sources and if any water will be sourced from NFS lands. Update figures to show proposed water tank locations.
158	Hyd1	26	2	2.4.7 Water Use and Management Table 2-6 Projected Water Use Estimates	Table 2-6 Projected Water Use Estimates	In other parts of the narrative drawings there is a raw water line going to the shop and the wheel wash from the ponds. Why is that water use for those activities not reflected in this table?
159	Hyd1	26	2	2.4.7 Water Use and Management Table 2-6 Projected Water Use Estimates	4) Assume a 3,000-gallon capacity water truck, applying full water load each hour for 5â€“8 hours per day during dry periods of the year. 5) Access road dust suppression is calculated as 0.06 gallons/ft2/day during dry periods. A binder, MgCl, or other approved material would be applied annually to minimize maintenance and reduce water use for dust control.	Please provide detail on the water source for the water truck, i.e. Is the stormwater from the industrial pond the primary assumed source water for this activity? How will water be collected from this pond for this activities?
160	Hyd1	26	2	2.4.7 Water Use and Management	A standard filtration system, such as a "Greensand Filter" would be installed at the site.	Where would this facility be located, and what is the anticipated water source feeding this filtration system?
161	Hyd1	27	2	2.4.8.3 Fuel Storage	Piping would extend from tanks to an adjacent fueling station.	What type of containment or spill prevention and response is proposed at the fueling station?
162	Hyd1	29	2	2.4.8.5 Materials and Supplies	These products would be delivered by a vendor and stored in approved containers within or directly adjacent to the temporary maintenance shop facility and within the contact/process water pond containment area.	This comment applies to both oils and lubricants as well as solvents proposed for storage within the containment berm for the mineralized stockpile. What type of risk is there having these materials potentially exposed to the contact water and sediment/sludge that could accumulate within the berm and containment area? How would these materials be separated from the uranium mineralized contact water? Is runoff from the shop and maintenance facility expected to intermix with the ore body runoff? Is this shop containment area supposed to provide source water for the mine operations as referenced earlier? Is it getting source water from the stormwater ponds?
163	Hyd1	29	2	2.4.9 Topsoil Handling	Salvaged growth medium material would be stockpiled either in windrows adjacent to the area where it was removed or placed in growth medium stockpiles. Bulldozers, front-end loaders, and/or scrapers will be used to remove the growth medium material. Stockpiled growth medium, including grubbed woody vegetation, would be protected from wind and water erosion and configured to promote temporary revegetation.	In other parts of the narrative and figures, it appears there is only one stockpile proposed, but here it sounds as if there could be several. What are the exact number and location of growth medium stockpiles? What specific wind and water erosion protection measures are proposed for these stockpiles? How will they be effective during wind and storm events? What sort of mats or other coverage is proposed while plant establishment is underway?

164	Hyd1	31	2	2 . 4 . 1 1 . 1 Site Access	The selected typical section provides a 12- to 18-foot gravel traveled way with 2-foot shoulders and adjacent ditches (approximately 24–30 feet total disturbed width), with additional widening at curves, grades, intersections, and designated pull-outs to allow safe passing and turning movements for loaded trucks and light vehicles.	see previous suggestion regarding comprehensive road section in MORP - Include proposed pullouts on figures.
165	Hyd1	34	2	2.6 Erosion and Sediment Control Plan	Stormwater management facilities such as ponds would be graded to pre-mine contours, and arroyos re-established as necessary to drain the reclaimed site.	What are the specifics of the reclamation for all of the proposed ponds; how will the toxic and radioactive sediments and sludge be removed, and what is proposed for the disposition of the liners? Is any of this material proposed for disposal into the mine? How will the many different diversion and re-routing channels be graded to restore the natural drainage patterns? What sort of sediment sampling and testing is proposed for these ponds and other constructed water features?
166	Hyd1	35	2	2.6 Erosion and Sediment Control Plan	Diversion channels would be designated and constructed for long-term stability.	Clarify whether some diversion channels are intended to be permanent features, and how are these channels distinct from the ones that would be re-graded? If channels are intended to be permanent identify as such on figures.
167	Hyd1	35	2	2.6 Erosion and Sediment Control Plan	Drainage from undisturbed areas would be routed around the surface facilities.	Does this offsite run-on drainage include drainage that originates from the upgradient CERCLA site? What other drainage from undisturbed areas would need management if the areas are not disturbed?
168	Hyd1	35	2	2.8 Reclamation Plan	The emphasis of the reclamation plan would be to close and seal mine portals (and the escape raise), remove surface facilities and infrastructure, and establish a vegetative community on the disturbed surface areas to restore the site to the desired post-mine use.	Does any part of the reclamation plan include any disposal of equipment or materials into the mine shafts or portals? Confirm that except for waste rock all materials, equipment, etc. Will be removed from the underground mine and surface lands of NFS.
169	Hyd1	37	2	2 . 8 . 2 . 2 Removal of Structures and Facilities	Unsalvageable portions of any facilities, such as a concrete pad used at the temporary maintenance shop, would be broken up and buried on site in accordance with solid waste regulations of the New Mexico Environmental Improvement Board (i.e., definition of â€œclean fillâ€ under Title 20, Environmental Protection, Chapter 9, Solid Waste, Part 2, Solid Waste Management General Requirements). As applicable, the CNF would determine the location and depth of the disposal if it is located on CNFmanaged lands.	What sort of testing and sampling is proposed for any potentially contaminated and saturated concrete pads, sump sediments, etc. to ensure hazardous and toxic wastes are not being buried on NFS lands?
170	Hyd1	38	2	2 . 8 . 2 . 4 Recontouring and Regrading	Final slopes of the portal pad area would be graded to a slope of 3H:1V or less. Compacted areas such as roads and the top of the portal pad would be ripped, disked, or otherwise left in a roughened condition prior to the replacement of growth medium material.	Because it has been noted that these pads would be comprised of potentially low-grade mineralized rock, and because pads and waste rock are serving as foundations for stormwater ponds receiving water that has contacted mineralized ore and potentially other shop and equipment related discharge, how will it be sampled and characterized to determine it is not toxic or radioactive such that it should be removed from the site? In particular, how will all stormwater ponds, catchment basins, and any other features that have received and accrued sedimentation and waste water be tested and sampled so these wastes are not left buried on NFS lands?

171	Hyd1	40	2	2.11 Post Mining Acid or Other Toxic Drainage	In accordance with19.10.6.602 D (15) (j), no description of post-mining acid or other toxic drainage is included, as no toxic drainage is expected from the proposed project. The acid-generating and acidneutralizing potential of rock samples representative of the waste rock stockpile was measured during the previous baseline data collection . Updated baseline data for the current project proposal is expected in summer 2026.	Please update to discuss potential draininge from reusing process water ponds and contact water re-use, and there are proposed MSGP stormwater ponds, what type of sampling and testing would be implemented to ensure the concentrated sediments and sludge within contact of these pads an features do not exceed safe levels?
172	Hyd1	41	2	2.11 Post Mining Acid or Other Toxic Drainage Figure 2-10 Post Mining Contour Map Contemporaneous Reclamation	Figure 2-10 Post Mining Contour Map Contemporaneous Reclamation	Given the former location of stormwater detention ponds and process water ponds within natural drainages, some of them lined ponds, how will hydrology be restored in the previously filled channels, and how will the materials be sampled to ensure remaining materials are not contaminated? Why is the network of the other proposed diversion channels not reflected on this figure? Will they be re-graded, or left in place? How will the newly re-excavated channels and banks be stabilized for restored hydrologic functions? What type of in channel and bank restoration features would be implemented? Will the channel armouring be left in place or removed for the southeastern-most arroyo? Will regrading occur in the same stages that construction of the benches and roadways occurred? Are the roads proposed to remain after grading?
173	Hyd1	42	2	2.12 Geotechnical Inspections and Observations	Installing appropriate geotechnical and/or hydrology monitoring instrumentation	Is there any existing instrumentation? It is unclear whether this instrumentation is proposed as part of the plan, or if it would only be installed if there are concerns later after design. Given the erosive potential of the landscape and the upgradient CERCLA site, what is the rationale for potentially foregoing this monitoring? What specific instrumentation is proposed for implementation throughout the life of the operation?
174	Hyd1	43	4	4.1.3 Hydrologic Balance	Underground mining operations would be limited to geologic formations that are above the regional groundwater aquifer. Operations will not impact aquifers.	What mitigation offsets or reclamation are proposed to address these potential changes in the hydrologic balance related to possible aquifer effects in quantity and quality?
175	Hyd1	43	4	4.1.3 Hydrologic Balance	Underground mining operations would be limited to geologic formations that are above the regional groundwater aquifer. Operations will not impact aquifers.	The characterization of groundwater flows and aquifers affected by drilling and mining have not been well described or defined. It also appears the drilling will intercept the westwater canyon formation which has been noted as a regional water source elsewhere.
176	Hyd1	43	4	4.1.4 Stream Diversions	There are no intermittent or perennial streams in the Permit Area.	Is there SDAM data or other survey results to substantiate this statement? Has a PJD or AJD been completed?
177	Hyd1	45	4	4.1.5 Impoundments Figure 4-1 Stormwater Detention Pond 60-Percent Design Grading Plan	Figure 4-1 Stormwater Detention Pond 60-Percent Design Grading Plan	Is there a proposed drainage channel between the upper pad and the parking/office pad? Are any of these diversion channels lined? If not, what is meant to keep the water from flowing subsurface and developing piping flows that could cause subsurface erosion and slope or pond failure?
178	Hyd1	46	4	4.1.10 Non-Point Source Releases	4.1.10 Non-Point Source Releases Given the planned safeguards for fuel and other chemical storage at the La Jara Mesa Project, the nonmineralized character of the waste rock stockpile, the absence of mine tailings, and the acid-neutralizing character of the native rocks in the project area, Laramide does not expect any acid or toxic releases either during or following mining operations.	How is this statement being substantiated given the other comments in the narrative about sampling needs, the potential re-use of contact stormwater, and the incompleteness of the drainage and stormwater designs?

179	Hyd1	48	Appendix A 60 Percent Designs	COVER SHEET G100	G100 B	Why is there no separate drawing sheet detail for the escape raise?
180	Hyd1	48	Appendix A 60 Percent Designs	COVER SHEET G100	G100 B	Why is the access road to the escape raise not reflected in this sheet?
181	Hyd1	49	Appendix A 60 Percent Designs	60% DESIGN EXISTING CONDITIONS G101	G101 B	Provide updates in the narritive section of the MORP to discuss Which ephemeral channel(s) receives upgradient flow from the proximate CERCLA site? Is/are the channel(s) within the proposed project area? What type of monitoring is proposed to characterize water quality conditions of the watering entering the proposed project area?
182	Hyd1	49	Appendix A 60 Percent Designs	60% DESIGN EXISTING CONDITIONS G101	G101 B	Is the road bifucating the proposed pads from NE to SW a NFS system road, and is it contiguous? Please label system road numbers.
183	Hyd1	50	Appendix A 60 Percent Designs	MINE SITE FACILITIES PLAN G102	MINE SITE FACILITIES PLAN G102	What is the intention for locating the generators within the footprint of the ore body stockpile? Are there any safety concerns with potential discharge intermixing?
184	Hyd1	50	Appendix A 60 Percent Designs	MINE SITE FACILITIES PLAN G102	MINE SITE FACILITIES PLAN G102	The OE (assume overhead electric) is only shown to the substation and is not shown to any of the other structures. What is the plan for powering each of the buildings and features requiring power?
185	Hyd1	50	Appendix A 60 Percent Designs	MINE SITE FACILITIES PLAN G102	MINE SITE FACILITIES PLAN G102	What is the feature or structure directly west of the ore pile? Is it a wheel wash or rumble strip? Why is it not contained or completely included within the proposed containment lines? Will water from this area flow into the storm sewer and catch basin indicated at the interception of the storm sewer, drainage ditch, and catch basin? Will this water enter the processing pond or the industrial stormwater pond? Will it receive any water quality treatment or monitoring?
186	Hyd1	50	Appendix A 60 Percent Designs	MINE SITE FACILITIES PLAN G102	MINE SITE FACILITIES PLAN G102	Why does the raw water line indicated only go to the wheel wash? Will raw water be used inside the mine, as indicated in the narrative? Will raw water from the industrial stormwater pond be used elsewhere, as dust control, etc? What sort of testing and monitoring is proposed for this raw water to ensure it is safe for land application or aquifer exposure? What is the source of the water for the maintenance and safety shops with the sanitary sewer lines? Is the raw water source primarily the industrial stormwater pond? Where are all water sources reflected in the drawing, and what is the the expected character of the water used for the shops, wheel wash, and other facilities? It appears the raw water from the industrial stormwater pond will be recycled in the shop and the wheel wash, and where it would then flow into the sanitary sewer. It seems unclear and likely that the industrial stormwater pond also will contain contact water exposed to mineralized ore piles and/or depositional pathways. What type of testing and monitoring will be implemented to ensure this contact water is safe for intermixing with shop chemicals, subsurface formation contact, and for discharge into septic drain fields?
187	Hyd1	50	Appendix A 60 Percent Designs	MINE SITE FACILITIES PLAN G102	MINE SITE FACILITIES PLAN G102	Is there any proposed separation between the waste rock stockpiles and the ore stockpiles? If so, where is that indicated on the drawings? Is all stormwater from the ore pads, the waste rock stockpile, the maintenance facility, and the wheel wash all expected to intermix? It appears this flow will only partially be captured and only part of it will be sent to the process water pond on top, and some to the industrial stormwater pond downgradient. How does the water make it around the indicated berms into the process water pond?
188	Hyd1	51	Appendix A 60 Percent Designs	MINE SITE FACILITIES MAIN BENCHES PLAN G103	MINE SITE FACILITIES MAIN BENCHES PLAN G103	Why are the growth stockpiles #22 labeled both north and south of the diversion ditch in this figure? Is there an intention to have additional growth stockpiles north and adjacent to the municipal stormwater pond?
189	Hyd1	51	Appendix A 60 Percent Designs	MINE SITE FACILITIES MAIN BENCHES PLAN G103	MINE SITE FACILITIES MAIN BENCHES PLAN G103	What feature is the black solid line coming both into and out of the maintenance shop, extending down to the wheel wash and then into the wheel wash, extending from there southeast towards the intersection of the sanitary and storm sewer line NW of the 13 label?
190	Hyd1	51	Appendix A 60 Percent Designs	MINE SITE FACILITIES MAIN BENCHES PLAN G103	MINE SITE FACILITIES MAIN BENCHES PLAN G103	What type of feature is the black-hyphenated process water containment boundary, and what is its design? It is unclear how it functions for complete or partial containment as it seems to overlap with or intercept multiple features including containment berms, storm sewer pipe indicators, and blue containment diversion ditches that flow out of the boundary. It is unclear what flows this area is meant to contain and how it is achieving this given its multiple openings and potential exposure interceptions with breaks in the berms, with containment diversion channels, and potentially with the storm sewer lines.
191	Hyd1	52	Appendix A 60 Percent Designs	DRAINAGE PLAN G104	DRAINAGE PLAN - G104	How will proposed roads that appear to be adjacent to several of these drainage/diversion ditches interface/interact with the function and design of these features?
192	Hyd1	52	Appendix A 60 Percent Designs	DRAINAGE PLAN G104	DRAINAGE PLAN - G104	Why is there no drainage plan or SWPPP for the proposed access and haul routes?

193	Hyd1	52	Appendix A 60 Percent Designs	DRAINAGE PLAN G104	DRAINAGE PLAN - G104	Include discussion of the catch basin and process water pipeline in the narrative section of the MORP to include proposed inlet into process water pond. Also include in the figure legend.
194	Hyd1	52	Appendix A 60 Percent Designs	DRAINAGE PLAN G104	DRAINAGE PLAN - G104	Are any additional downstream erosion protection and control features proposed within the natural drainage downstream of the final pond and channel discharge points, particularly given the channel realignments and the volume of water that is proposed to be added to the existing natural drainage system?
195	Hyd1	52	Appendix A 60 Percent Designs	DRAINAGE PLAN G104	DRAINAGE PLAN - G104	Why are there no erosion control features indicated at: the outlet of the drop culverts from the green diversion channels, the south/lower east ephemeral drainage/diversion, or the decant outlet structure, all re-entering the natural drainage channel below the graded benches? Later in the SWPP it has arrows pointing, but no feature; what are the extent and design of these features?
196	Hyd1	52	Appendix A 60 Percent Designs	DRAINAGE PLAN G104	DRAINAGE PLAN - G104	what erosion protection measures are proposed for the intersection slopes at the head of the north secondary bench containment channel? How will flows surmount the indicted MHSA safety bench? Will any of these flows from this bench be able to enter the exit road containment channel?
197	Hyd1	52	Appendix A 60 Percent Designs	DRAINAGE PLAN G104	DRAINAGE PLAN - G104	How are drainage channels labeled road containment and exit road containment on the northwestern and southeastern perimeters meant to contain flows if they are also meant to function as drainage
198	Hyd1	52	Appendix A 60 Percent Designs	DRAINAGE PLAN G104	DRAINAGE PLAN - G104	Where are the proposed inlet and outlet to the process water pond described in the narrative? How, where, or does it connect with the diversion channels and industrial stormwater pond? Exactly what drainage area will the process pond receive, and what drainage area will be omitted from the process pond? What areas of the pad will flow directly to the industrial stormwater pond, and what areas of the pads will drain directly to the diversion ditches without entering one or more of the stormwater ponds?
199	Hyd1	52	Appendix A 60 Percent Designs	DRAINAGE PLAN G104	DRAINAGE PLAN - G104	At points of interception where each cuts perpendicularly across existing drainage features, how will the green diversion channels be designed to intercept these flows without washing out? Are any erosion control features proposed upgradient within the natural channel or in the constructed drainage features below the channel interception points?
200	Hyd1	52	Appendix A 60 Percent Designs	DRAINAGE PLAN G104	DRAINAGE PLAN - G104	Why is there a break in proposed erosion protection where the norteastern diversion enters perpendicularly to the exisitng channel, which appeears to be rerouted into a different constructed green diversion channel that resumes erosion downstream from the northeastern inlet? Why is there a channel realignment, and how will erosion be addressed in the short segment, given the 90 degree turn the constructed channels are imposing?
201	Hyd1	52	Appendix A 60 Percent Designs	DRAINAGE PLAN G104	DRAINAGE PLAN - G104	Please update the MORP to include a narrative on the diversion channels and structures, to include: the function of the northernmost blue diversion erosion protection structure that seems to be shunted to a upper northwest storm sewer line and catch-basin. Where does the catchbasin flow to or release; is it into the same storm sewer pipe? What is the exact function, capacity, flow direction, and design of all of these features and structures? Is the storm sewer a pipe structure, and what is the capacity of it and the catch basin? Where do these features outlet, including their immediate and final discharge points? How do they interface with the proximate vent access ? How to these features connect and interface with the proposed green diversion channel?
202	Hyd1	52	Appendix A 60 Percent Designs	DRAINAGE PLAN G104	DRAINAGE PLAN - G104	At the intersecting location between the northwest storm sewer and green diversion channel it appears the green diversion channel flow is graded to the interior center of the mining operation, and the outlet, flow volumes, or capacity is unclear. What is the intended flow volume, direction, and disposition of these intercepted flows? Is the diversion channel meant to flow to the base of the pad, or are the arrows just pointed in the wrong directions? Is there any type of erosion control structure or engineered feature proposed at the interception of the storm sewer with the green diversion channel?
203	Hyd1	53	Appendix A 60 Percent Designs	SWPP EROSION CONTROL PLAN G105	SWPP EROSION CONTROL PLAN G105	Please provide details on erosion control in earlier construction phases, not just for the final buildout.
204	Hyd1	53	Appendix A 60 Percent Designs	SWPP EROSION CONTROL PLAN G105	SWPP EROSION CONTROL PLAN G105	What sort of wildlife and aviary protections are proposed for the stormwater ponds, including the process water pond, since it sounds like there is intention that standing water remain in these ponds for some duration of time?
205	Hyd1	53	Appendix A 60 Percent Designs	SWPP EROSION CONTROL PLAN G105	SWPP EROSION CONTROL PLAN G105	What sort of measures are proposed for ESC and stormwater related to the growth medium stockpile?
206	Hyd1	53	Appendix A 60 Percent Designs	SWPP EROSION CONTROL PLAN G105	SWPP EROSION CONTROL PLAN G105	How are the SWPP plan and drainage plans distinct? The SWPP does not reflect locations of any temporary or permanent erosion and sediment control measures. Why is the SWPPP/ESCP limited to the mining operations bench, when disturbance and activities will occur along roadways and at the escape raise location as well?
207	Hyd1	53	Appendix A 60 Percent Designs	SWPP EROSION CONTROL PLAN G105	SWPP EROSION CONTROL PLAN G105	What was the rationale for the location and design of the proposed sediment dam, and why is only one within the existing channel that will be armored considered sufficient? What is the proposed maintenance for this sediment dam, and will it be left in place at reclamation? Is source water from upgradient or sediment testing at the dam proposed to characterize the water quality in this redirected channel?

208	Hyd1	54	Appendix A 60 Percent Designs	GRADING C100	GRADING C100	Why is the loading pad not fully contained within the containment boundary? Where will contact stormwater from this location flow to? Is this portion of the bench lined?
209	Hyd1	54	Appendix A 60 Percent Designs	GRADING C100	GRADING C100	Is it likely that the raw water pumped to the equipment wash has source water from all stormwater runoff, including contact water from the process pond? Is it proposed that the raw equipment wash water be discharged into the sanitary sewer, or into any of the diversion ditches that could bypass the stormwater ponds?
210	Hyd1	54	Appendix A 60 Percent Designs	GRADING C100	1. CUT/FILL SLOPES, BENCHING, AND RETAINING REQUIREMENTS ARE CONSERVATIVE BUT PRELIMINARY; FINAL SLOPES AND STABILIZATION MEASURES WILL BE BASED ON GEOTECHNICAL ASSESSMENT HAS BEEN SCHEDULED, BUT AS SITE MATERIAL BECOMES AVAIALBLE IT WILL BE ASSESSED FOR GEOTECHNICAL PARAMETERS AND DESIGN ADJUSTED WHERE NECESSARY.	Without a complete geotechnical evaluation, what cut/fill volume calculations have been estimated to ensure enough volume of material is available to build a sufficient bench composed of clean mine materials that will be sufficiently stable/durable to withstand the erosiveness of the bisecting drainages? It's understandable that the plan is to build the bench in stages, but the drainage and SWPPP plans all seem to rely on an existing process water pond and then separate industrial stormwater ponds. These do not appear planned until phase 4. What type of ore storage and stormwater controls will be in place in the first 3 phases of construction and development?
211	Hyd1	55	Appendix A 60 Percent Designs	PROCESS WATER POND PLAN & SECTION C101	PROCESS WATER POND PLAN & SECTION C101	Please update figures to show flow direction on storm sewer and sanitary sewer lines.
212	Hyd1	55	Appendix A 60 Percent Designs	PROCESS WATER POND PLAN & SECTION C101	PROCESS WATER POND PLAN & SECTION C101	What is the MHSA safety berm composed of? Is it permeable? What is the "inlet break berm"? Can any of the stormwater runoff from the entirety of the main bench reach the process pond without going through the inlet pipe?
213	Hyd1	56	Appendix A 60 Percent Designs	PROCESS WATER POND PLAN & SECTION C102	PROCESS WATER POND PLAN & SECTION C102	What sort of pump infrastructure and power source is proposed for the raw water line back to the operations bench?
214	Hyd1	56	Appendix A 60 Percent Designs	PROCESS WATER POND PLAN & SECTION C102	PROCESS WATER POND PLAN & SECTION C102	Because the plans seems to excavate deeper below the existing grade of the natural arroyo, are either the upper Industrial stormwater pond or lower unlined pond likely to intercept flows from the natural drainage channel that bisects the design? Is there a chance that subsurface flows will be intercepted and mixed with stormwater flows? How will each/both interact with the groundwater table and subsurface flows likely in the existing natural drainage? How will this interaction affect the integrity of the pond liner?
215	Hyd1	56	Appendix A 60 Percent Designs	PROCESS WATER POND PLAN & SECTION C102	PROCESS WATER POND PLAN & SECTION C102	How does the proposed design address the natural channel between the upper and lower pond cells?
216	Hyd1	57	Appendix A 60 Percent Designs	PROCESS & MSGP INDUSTRIAL STORMWATER POND DETAILS C103	DETAIL: PROCESS WATER POND AREA LINER	What is the proposed depth and type of drainage aggregate? What is the proposed material for the 6" buffer layer? What is the proposed depth of the clay layer? How was that depth selected as sufficient to withstand operational and maintenance activities for the lifetime of its use? Where is the geomembrane placement relative to these layer depictions?
217	Hyd1	57	Appendix A 60 Percent Designs	PROCESS & MSGP INDUSTRIAL STORMWATER POND DETAILS C103	DETAIL: PROCESS WATER POND AREA LINER	What is the plan if these liners fail, crack, or leak?
218	Hyd1	57	Appendix A 60 Percent Designs	PROCESS & MSGP INDUSTRIAL STORMWATER POND DETAILS C103	DETAIL: PROCESS WATER POND AREA LINER	Why was 80mil selected, and are there other stronger thicknesses that would ensure better durability? How will the membrane be protected from tearing during normal operations and maintenance activities? What protections are proposed for maintaining the integrity of the membrane and pond seal?
219	Hyd1	58	Appendix A 60 Percent Designs	DRAINAGE DETAILS C200	SECTION: DIVERSION DITCH (TYP)	Given the locations of these ditches bisecting operational benches and intersecting upgradient flows, along with the erosive nature of water and general site conditions, will these ditches be lined, permeable, or semipermeable, and to what extent with what materials? How will these designs avoid piping and subsurface flows penetrating the benches?
220	Hyd1	58	Appendix A 60 Percent Designs	DRAINAGE DETAILS C200	SECTION: CONTAINMENT DITCH (TYP)	Besides channel bottom designs, what is the distinction in design and function between diversion and containment ditches? Given the locations of these ditches bisecting operational benches and intersecting upgradient flows, along with the erosive nature of water and general site conditions, will these ditches be lined, permeable, or semipermeable, and to what extent with what materials? How will these designs avoid piping and subsurface flows penetrating the benches? How will they keep contaminated contact water from re-entering the system without treatment?

221	Hyd1	60	Appendix A 60 Percent Designs	ROAD SECTION & DETAILS C300	ROAD SECTION & DETAILS C300	Please provide additional details on the outboard road ditches, for example: how will these designs interact to ensure contact and contaminated flows do not start flowing subsurface, contaminating other portions of the waste rock fill, and start piping through the benches?
222	Hyd1	61	Appendix A 60 Percent Designs	ACCESS ROAD OVERVIEW PLAN C400	ACCESS ROAD OVERVIEW PLAN C400	Why is the southern road tail at station 200 missing? Where is the escape vent access? What is the proposed design storm for these crossings? What other channel stability features are proposed up and downstream of the crossings?
223	Hyd1	62	Appendix A 60 Percent Designs	ACCESS ROAD PLAN & PROFILE STA 0+00 TO 50+00 C401	ACCESS ROAD PLAN & PROFILE STA 0+00 TO 50+00 C401	Is there a culvert proposed at ST 45? Where is the proposed road fill coming from; is it from the first phases of mine excavation? What is the origin of the proposed fill, for this and for all the fill profiles along the access routes?
224	Hyd1	66	Appendix A 60 Percent Designs	ACCESS ROAD PLAN & PROFILE STA 200+00 TO 250+00 C405	ACCESS ROAD PLAN & PROFILE STA 200+00 TO 250+00 C405	Is there a culvert or other crossing structure missing at stations 221 and 240? For this particularly steep stretch, and for all sections, where are proposed runout ditches and waterbars proposed? While culvert sizing is indicated as incomplete, there is not mention of other roadway drainage and design BMPs to manage roadway hydraulics in a manner protective of the existing area hydrology and drainages. The only mention is ditches, which have little to no design detail and no discussion of reducing and retaining flows and sediment runoff from this access route.
225	Hyd1	69	Appendix B Process and Stormwater Pond Sizing	Figure B-1 Process Pad Collection Area	Figure B-1 Process Pad Collection Area	It appears the design of the upslope diversion ditch intends to intercept multiple arroyo/drainages at nearly right angles, including 2 significant converging drainages that meet near the proposed ore stockpile and pond, one of which appears to have some sort of constructed feature (fuel line??) within/adjacent to it. Given the natural flowpaths are determined by upstream topography and gradients, it does not seem reasonable to assume the contributing upstream drainage area will be easily turned to right angles around the proposed pad and portal shaft. The design or these diversions is unclear and does not seem to account for upgradient forces of gravity and channelized flow that will be pushing against and eroding the diversion channel as well as the constructed fill of the elevated pad. There also does not seem to be any accounting for subsurface flows that also move through these channelized features. It is concerning that the small diversion channel and fill elevation are expected to sufficiently separate run-on flows from contact flows at the mineralized ore site. There does not seem to be any water quality treatment proposed before the contact water is re-discharged to the surface channels downgradient, or infiltrated into the groundwater table. It is also very concerning that the proposed treatment pond is located as fill over the top of the existing drainage channe
226	Hyd1	70	Appendix B Process and Stormwater Pond Sizing	Table B-1 Sizing Scenarios Scenario 1 Assumes (Curve Number is 99)	Precipitation depth, 200-year, 45-day storm	Provide updates to include criteria for chosen design storms. Also, what type of inundation and depth occurs during more frequently occuring storm events? What size events are crossing infrastructure designed for?
227	Hyd1	70	Appendix B Process and Stormwater Pond Sizing	Table B-1 Sizing Scenarios Scenario 2 Assumes (Curve Number is 99)	Scenario 2 Assumes (Curve Number is 99)	How are assumptions in scenario 2 different from scenario 1 if both are 200-yr, 45 day storm events?
228	Hyd1	70	Appendix B Process and Stormwater Pond Sizing	Table B-1 Sizing Scenarios Scenario 3 Assumes (Curve Number is 99)	Precipitation depth, 200-year, 45-day storm	Is this supposed to reflect a 500-year event rainfall depth?
229	Hyd1	71	Appendix B Process and Stormwater Pond Sizing	Table B-2 Estimated Water Demands	15-Day Water Demand (Ac-Ft)	What is the proposed water source after the 15-day source from the 200-year event is depleted?
230	Hyd2	7	2	2 Overview of Mining Operations Figure 2-1 Subsurface Geology of the Proposed Permit Area	Figure 2-1 Subsurface Geology of the Proposed Permit Area	Where is the aquifer that is mentioned later? Would be good to show how far from the adit it is.

231	Hyd2	9	2	2.1.1 Portal Face-Up and Excavation	During the initial portal excavation work, when there is a potential for flyrock on the surface, precautions applicable to surface blasting operations would be followed.	Please include an attachment describing what precautions will be followed during surface blasting operations to mitigate the potential for flyrock.
232	Hyd2	9	2	2.1.1 Portal Face-Up and Excavation	Once below ground, subsurface blasting procedures would apply.	Please include an attachment describing what precautions will be followed during subsurface blasting operations.
233	Hyd2	14	2	2.1.6 Bulk Sampling	Bulk samples would be temporarily stored on the surface of a compacted clay liner on the waste rock dump prior to transport to the mill for testing.	Is there a remediation plan for the clay liner? How is it checked to make sure it does not allow leaching, and then will it be removed later?
234	Hyd2	18	2	2.3.1 Surface Development Phase 1	Culvert sizes, inverts, and locations are preliminary and shall be finalized upon completion of detailed hydrologic modeling, hydraulic capacity checks, and roadside drainage design.	Provide template or list outputs that will be provided, maybe in an appendix.
235	Hyd2	18	2	2.3.1 Surface Development Phase 1	Conduct inspections weekly and after any significant storm event to ensure controls are functioning and sediment is removed as needed.	Specify what is defined as a significant storm that will trigger the inspection.
236	Hyd2	18	2	2.3.2 Surface Development Phase 2	Expand best management practice (BMP) installation to encompass all new disturbances	Specify which BMPs or reference if listed elsewhere.
237	Hyd2	22	2	2.4.2 Impoundments and Stormwater Control	Following the conservative event-based assessment, the project team developed a 1-year precipitation versus evaporation hydrologic and hydraulic (H&H) model to further refine pond performance and storage requirements for the ore stockpile scenario.	The data and/or information from the assessment is not described and would provide rationale that the impoundments and stormwater controls have a proper design.
238	Hyd2	26	2	2.4.7 Water Use and Management Table 2-6 Projected Water Use Estimates	4) Assume a 3,000-gallon capacity water truck, applying full water load each hour for 5–8 hours per day during dry periods of the year.	Please provide more information regarding this note so we can follow along with calculations. When is considered the dry period of the year?
239	Hyd2	34	2	2.6 Erosion and Sediment Control Plan	Growth-medium material removal activities would be scheduled for the dry periods to reduce the potential for erosion and soil losses.	Elaborate, does this mean avoiding monsoon season, or meaning when the soil is dry?
240	Hyd2	6	2	2 Overview of Mining Operations	The dual inclines would each be approximately 5,000 feet long, and the unmineralized “development rock” excavated would be used to build a waste rock stockpile at the portal site. An escape raise, which would provide ventilation and an emergency escape route from the underground mine workings, would be located on the surface of La Jara Mesa, generally atop the uranium deposits (see Figure 2-1).	Figure 2-1 shows the escape raise going through many different formations. Are any of them water bearing, is there a general understanding of the groundwater flow system, and how would the water be protected (casing, BMPs, bulkhead shape, etc.).

241	Hyd2	18	2	2.3.4 Surface Development Phase 4	2.3.4 Surface Development Phase 4	This section does not have the "Expand BMP installation ..." bullet. This section has a drainage and water management plans that should be highlighted in the BMPs.
242	Hyd2	22	2	2.4.2 Impoundments and Stormwater Control	The upper portion of this pond (1.5 acre-feet) would be lined to maximize water retention for operational use, and the lower portion of the pond (3.4 acre-feet) would be sized to manage large storm events and control downstream release. Water in the upper pond would be used for operations and dust control in non-mining areas. Water in the lower pond would be allowed to evaporate, percolate into the ground, or be used in site dust control (Figure 2-2 or C-102 in the design set).	Explain why water quality is good enough to allow the water to be used for operational use and percolation.
243	Hyd2	23	2	2.4.2.1 Contact Water (Process) Pond	Runoff into this process pond will only be allowed to evaporate or will be returned underground for use in operations and dust control.	Explain why water quality is good enough to allow the water to be used for dust control.
244	Hyd2	37	2	2.8.2.3 Portal and Escape Raise Closure	The project site portals would be closed in accordance with NMAC Section 9.10.6.603 C (1)(a). A concrete, cemented cinder block, or similar constructed bulkhead will be installed inside each portal. Each incline would be backfilled with waste rock material, extending from the portal bulkhead to outside the actual portal.	Confirm if there are or are not any of the geologic zones in the project area water bearing and there is groundwater flow potential?
245	Hyd2	40	2	2.11 Post Mining Acid or Other Toxic Drainage	Updated baseline data for the current project proposal is expected in summer 2026.	How will mineralized material be treated other than uranium if encountered, and how will it be tested to ensure the rock will not cause acid-leaching or other issues from deleterious elements?
246	Hyd2	40	2	2.9 Reclamation Schedule	Following the completion of physical closure and revegetation, a post-closure monitoring period would begin to assess vegetation establishment, drainage performance, overall stability of reclaimed areas, and other metrics.	If anything new comes from baseline data updates in summer 2026, additional water quality monitoring would be good to ensure no leaching or runoff from stormwater.
247	Pln	29	2	2.4.9 Topsoil Handling	Available growth medium materials would be stabilized using BMPs (such as seeding, mulch, organic matter, etc.).	Some BMPs are outlined in the SWPPP. MPO generally mentions BMPs with no detail. Please include BMPs as attachements. Recommend considering USDA Forest Service National BMPs for Water Quality Management on NFS Lands, Guidance for Invasive Species Management in the Southwest Region. This recommendation would apply here [topsoil handling] and to other BMP considerations relating to water, soil, revegetation, weed management throughout the MPO.
248	Pln	18	2	2.3.2 Surface Development Phase 2	Expand best management practice (BMP) installation to encompass all new disturbances	During surface development phase 2 and phase 3, what does it mean to expand best management practice installation? Please include the BMPs as an appendix.

249	Pln	21	2	2.3.4 Surface Development Phase 4	Over the life of the project, surface disturbance would be limited to the extent necessary to construct surface development of the mine, improve access and haul roads, construct the escape raise, and make improvements to bring water and power to the site, within the 96 acre permit area.	Describe what the improvements required to bring water and power to the site will be?
250	Pln	25	2	2.4.3.2 Solid Waste Disposal	Any petroleum waste products would be stored in approved containers on-site, separate from other waste, and transported off-site for recycling or disposal at an approved facility.	MPO describes storage of various hazardous substances. Is a spill prevention and containment plan available? Please include as an appendix.
251	Pln	34	2	2.6 Erosion and Sediment Control Plan	Vegetation would be removed only from areas directly affected by the La Jara Mesa Project activities. Other areas will not be cleared.	How much of the proposal area is expected to be cleared in acres? Could clearing take into account scenery objectives to reduce contrast of the site with the landscape (e.g., vegetative screening, or vegetative variety to improve texture, promoting site that is visually subordinate to natural surroundings)
252	Pln	35	2	2.8 Reclamation Plan	2.8 Reclamation Plan	Please include a plan to address interim reclamation requirements for unforeseen shutdown and temporary cessation?
253	Pln	36	2	2.8.1 Construction Reclamation	Undesirable invasive and noxious weeds can infest disturbed areas, both in the short and long term.	In addition to weed management during reclamation, will the site be assessed for invasive and noxious weeds prior to development and will weed monitoring/management be conducted throughout the life of the mine to prevent spread outside site boundary?
254	Ran	14	2	2.1.6 Bulk Sampling	Haulage of material to off-site testing facilities would be conducted periodically to eliminate the need for a large stockpile.	Is there a trigger in size "e.g. cubic yards" for the hauling?
255	Ran	14	2	2.1.6 Bulk Sampling	Haulage of material to off-site testing facilities would be conducted periodically to eliminate the need for a large stockpile.	Is there a way we could get a better idea of what "periodically" consists of? e.g. estimated number of trips per month or season or volume threshold.
256	Ran	16	2	2.1.8 Equipment Table 2-3 Mobile Equipment List	Surface	
257	Ran	31	2	2.4.11.1 Site Access	It is expected that approximately 12 to 15 truckloads of ore would be hauled from the mine daily, though this would be determined by actual production rates.	Is there a expected MPH requirement that your employees are required to adhere to? It may be more appropriate for vehicles that are taking larger loads along FS 450 to stay within 15-20 mph to prevent accidents to livestock.
258	Ran	32	2	2.4.11.4 Ventilation Facilities	The primary ventilation fan would be located at the surface portal facilities. Smaller secondary booster fans may be placed underground to increase ventilation. This may include a booster exhaust fan near the bottom of the escape raise.	It will be important to incorporate some noise mitigation measures for ventilations fans to comply with applicable ambient noise standards to prevent levels over 40-50 dBA. Some possible suggestions to mitigate could consist of incorporating fan silencers/mufflers, acoustic enclosures or shrouds, or incorporating a variety of speed drives on the fans.

259	Ran	36	2	2.8.1 Construction Reclamation	Undesirable invasive and noxious weeds can infest disturbed areas, both in the short and long term. Control measures that may be implemented include hand-pulling, hand-digging, and biological control to prevent and restrict the spread of noxious weeds. Certified noxious weed-free mulch and seed mixtures would be used to reclaim disturbed areas and control the spread of weedy species.	It would be helpful that you specify that you will incorporate the CNF EA for Integrated Pest Management of Noxious/Invasive Plants from June 2010. That you will coordinate with the CNF before you plan or invasive plant work to incorporate all necessary mitigations and appropriate pesticides.
260	Rec	35	2	2.8 Reclamation Plan	2.8 Reclamation Plan	Roads expanding and improved. Will roads be reclaimed to their pre-disturbed condition?
261	Rec	31	2	2 . 4 . 1 1 . 1 Site Access	The road upgrade work would accommodate highway-legal trucks used to haul uranium ore from the site. This road is intended for low-volume mixed traffic, including on-highway trucks. I	With the use of OHV and other dispersed rec in area along NFS road 450, 450F, and NFS motorized trail 401. Is there a traffic control plan being crafted for mixed-traffic use?
262	Tri	11	2	2.1.5 Underground Support Services	Any used oils, residue, or waste from drilling would be disposed of in a permitted off-site facility.	How frequent will used oils, residue, or waste from drilling be disposed of in a permitted off-site facility?
263	Tri	11	2	2.1.5 Underground Support Services	Underground drilling would be conducted in two 10-hour daily shifts on a 10-day on, 4-day off schedule.	Is the operation expected to operate year-round, 365 days a year? Will there be any down-time where operations are quiet and no activities occur? Will there be any reduction in noise or light levels during the maintenance periods?
264	Tri	23	2	2.4.2.1 Contact Water (Process) Pond	2.4.2.1 Contact Water (Process) Pond	During reclamation, inlcude how the excess water will be manage for final mine closure.
265	Tri	25	2	2.4.3.2 Solid Waste Disposal	Trash and garbage would be contained on-site in bins and hauled off-site for disposal at an approved landfill.	How frequent will garbage be hauled off-site? Wil lthe bins be wildlife proof?
266	Tri	31	2	2 . 4 . 1 1 . 1 Site Access	Laramide would be responsible for ongoing road maintenance, including snow removal, to provide safe and efficient year-round access to the surface portal facilities area.	Describe what ongoing road maintenance activities could entail throughout the mine operation.
267	Tri	32	2	2 . 4 . 1 1 . 8 Outdoor Lighting	For safety reasons, outdoor lighting would be required during hours of darkness.	Please describe in more detail the applicable night standards Laramide is proposing to be complying with, as it will affect the visual impacts of the Mt Taytor TCP as well.
268	Tri	39	2	2.8.2.6 Fertilizing, Mulching, and Seeding	Post-reclamation revegetation monitoring and sampling are required for a minimum of 2 years of the liability period.	How regular will the revegetation monitoring occur by Laramide?
269	Tri	45	4	4.1.5 Impoundments	Growth medium stockpiles would be protected from wind and water erosion. Because these stockpiles would remain in place for the duration of the mining, they would be seeded during the first normal planting season following their completion.	How is this related to impoundments? How would the stockpiles be protected from wind and water? Would the newly planted area be monitored theyear after planting the seeds to ensure successful vegetation?

NM_Dept of Wildlife Comments

Comment #	Section	Subsection	Agency Comment	Laramide Response/
1			In Section 2.4.2.1 Contact Water (Process) Pond, the Department is concerned that the contact water pond(s) might contain contaminated water that is potentially hazardous to wildlife. The Department requests that Laramide address the potential for contact with water ponds to be hazardous to wildlife and, if necessary, what measures will be taken to exclude both terrestrial and volant wildlife from accessing those areas.	
2			In Section 2.4.11.10 Security and Fencing, it states that "a four-strand barbed wire perimeter fence would be installed around the La Jara Mesa Project surface facilities area". The Department recommends that Laramide use wildlife-friendly fencing (e.g., Recommendations for Constructing Wire Fences for Livestock in Big Game Habitats). Wildlife-friendly fencing will control cattle in most situations and allow for easier wildlife passage. Fences should have top wires low enough for large adult animals to jump and bottom wires high enough for smaller wildlife to crawl under and to minimize the chance of animals becoming entangled. The Department recommends the following for wildlife-friendly fencing: • A top wire or rail preferably no more than 40 inches and an absolute maximum of 42 inches above the ground. • At least 12 inches between the top two wires. • A bottom wire or rail at least 16 inches and preferably 18 inches above the ground. • Smooth wire or rail for the top and smooth wire on the bottom.Preferably, no vertical stays between posts, and if stays are used, consider stiff plastic or composite stays with 10-foot spacing between posts and stays. • Fence posts should be located at 10-foot up to 16.5-foot intervals.	
3			In Table 2-8 Reclamation Seed Mixture, the proposed native seed mixture is tentative pending U.S. Forest Service approval. The proposed seed mix only contains cool- and warm-season grasses. The Department recommends that forb species should also be included and recommends adding the following: Lewis's flax (Linum lewisii), white prairie clover (Dalea candida), and blanket flower (Gaillardia pulchella) to the proposed seed mix. The species list in Table 2-8 only provides the common names and should also include the scientific names for clarity.	

NMED Combined Comments

Comment #	Section	Subsection	Agency Comment	Laramide Response/ Attachment
1	General		General Comment – MECS has previously stated a discharge permit will be needed for the La Jara Mesa Project. However, additional permitting in the form of a Notice of Intent may be needed for mine development activities. MECS requests additional details be provided for these activities when they are available if they are intended to occur before the submittal of a discharge permit application.	
2	General		Groundwater monitoring is not discussed in the MORP. Groundwater background chemistry needs to be fully established prior to any site development or construction activities.	
3	General		In meetings on the project, MECS was informed the project would be designed to be non-discharging. The designs presented here for pad construction, road construction, mine facilities, impoundments, stormwater controls, sewage and other waste disposal, storage areas (fuel and explosive), and shops have the potential to discharge and impact groundwater. MECS will address the design of these facilities in the discharge permit application.	
4	2		MORP Section 2.0 "unmineralized "development rock" excavated would be used to build a waste rock stockpile at the portal site". As discussed in the 2024 MECS comments on the Baseline Data Report (BDR), information is lacking on the characterization of the development rock.	
5	2.4.10		MORP Section 2.4.10 Waste Rock Dumps – MECS does not support the plan of surface waste dumps regraded without soil cover at final closure. The details of the soil cover will be determined by the geochemical properties of the placed material and the impacts from operations at the time of closure.	
6	2.8.2.3		MORP Section 2.8.2.3 Portal and Escape Raise Closure – MECS does not support the proposed design of the portal closure since the groundwater production of the geologic units encountered have not been provided as stated in the 2024 BDR comments. MECS will work with EMNRD to determine an appropriate closure protocol when the hydrologic conditions of the portals and escape raise are known.	
7	2.3.1		SWQB Comment 1 – All mobile equipment used in the project area must be pressure washed and/or steam cleaned off-site before the start of the project to facilitate noxious weed management and inspected daily for leaks to ensure surface waters are protected from contaminants. Keep a written log of inspections and maintenance activities.	
8	2.3.1		SWQB Comment 2 – Comply with guidelines described in the Bureau of Land Management "Gold Book"1 for the use of overland travel and site selection, design, and construction of well pads, reserve pits, and roads. Suspend construction, maintenance activities, or off-road travel during periods when the soil is too wet to adequately support heavy equipment without causing surface disturbance. The operator should commit to repairing any surface disturbance they cause.	
9	2.3.1		SWQB Comment 3 – Setback roads, pads, and other facility structures a minimum of 100 feet from any watercourses, including springs, wetlands, and ephemeral stream channels, when feasible. If a 100-foot natural buffer is not possible, engineering controls should be implemented to provide comparable protection to waterbodies.	
10	2.4.2		SWQB Comment 4 – Models were used to estimate annual precipitation. SWQB recommends that annual precipitation estimates take climate change into consideration. The New Mexico Bureau of Geology and Mineral Resources reports in "Climate Change in New Mexico Over the Next 50 years: Impacts on Water Resources" that the true precipitation from the 100-yr storm may be closer to that which is currently projected for a 500-yr storm2.	
11	2.4.2.1		SWQB Comment 5 – The SWQB suggests using the 500-yr, 24-hour storm events to design the contact water (process) pond and the two-stage stormwater contact pond.	
12	2.4.2.1		SWQB Comment 6 – Before using water from the two-stage stormwater contact pond for dust suppression, water quality samples should be collected and analyzed to ensure contaminants are not being spread.	
13	2.4.2.1		SWQB Comment 7 – A groundwater discharge permit or a state surface water discharge permit may require groundwater and/or surface water monitoring and reporting. These requirements will be determined by NMED during the permitting process. NMED SWQB is still in the process of developing a surface water quality state permitting program that is expected to begin issuing state permits in 2027. Laramide Resources will need to contact SWQB and ensure the La Jara Mesa project has appropriate permit coverage.	
14	2.4.2.1		SWQB Comment 7 – A groundwater discharge permit or a state surface water discharge permit may require groundwater and/or surface water monitoring and reporting. These requirements will be determined by NMED during the permitting process. NMED SWQB is still in the process of developing a surface water quality state permitting program that is expected to begin issuing state permits in 2027. Laramide Resources will need to contact SWQB and ensure the La Jara Mesa project has appropriate permit coverage.	
15	2.4.3.1		SWQB Comment 8 – Ensure regular inspections and maintenance occur for the septic tank and leach field. For large capacity (greater than 5,000 gallons per day) septic tank leach field systems, contact NMED-GWQB. For small septic systems, contact NMED-Environmental Health Bureau's Onsite Wastewater Program and ensure that the septic system is adequately installed and maintained	
16	2.4.8.3		SWQB Comment 9 – Appropriate spill clean-up materials such as absorbent pads must always be available onsite during road construction, site preparations, and drilling activities to address potential spills. Report all spills immediately to the NMED as required by the New Mexico Water Quality Control Commission Regulations (20.6.2.1203 NMAC). For non-emergencies during normal business hours, call 505-428-2500. For nonemergencies after hours, call 866-428-6535. For emergencies only, call 505-827-9329 twenty-four hours a day (New Mexico Department of Public Safety). For spills that reach Surface Waters of the State (SWOTS), including ephemeral streams, report via email at SWQ.reporting@env.nm.gov.	
17	4.1.4		SWQB Comment 10 – Three unnamed arroyos are located within the permit boundary and are subject to 20.6.4.98 NMAC. Designated uses include livestock watering, wildlife habitat, marginal warmwater aquatic life and primary contact. Mining activities that have the potential to contribute pollutants to waters of the states must be implemented with appropriate and reasonable Best Management Practices (BMPs) in order to prevent impacts to water quality.	
18	4.1.10		SWQB Comment 11 - Any discharge of a water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, must be reported to the Environment Department within twenty-four hours (20.6.2.1203 NMAC).	

Comment #	Section	Subsection	Agency Comment	Laramide Response/
NM SHPO - No comment at this time				

Comment #	Section	Subsection	Agency Comment	Response/ Attachment
			NM OSE - No comment at this time as Applicant Purchasing water	

Comment #	Section	Subsection	Agency Comment	Laramide Response/
NM Botany - No comment at this time.				