

**Enclosure No.7**

7-10-2009 A MMD Compilation of Agency Reviews for the Roca Honda April 2009 SAP-MK025RN

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Enclosure to July 13, 2009 letter to John DeJoia—Review and Comments on Sampling and Analysis Plan, RHR, LLC, Roca Honda Mine, Permit No. MK025RN

**7-10-2009 A MMD Compilation of Agency Reviews and Comments for the Roca Honda Resources Sample an Analysis Plan in support of Permit No. MK025RN**

The following set of tables is a compilation of review comments generated from agency reviews of Roca Honda Resources' April 2009 Sample and Analysis Plan. The reviewing agencies are; NM Mining and Minerals Division, NM Environmental Division, NM Department of Game and Fish, NM Department of Cultural Affairs, NM State Forestry Division, and the NM Office of the State Engineer. Each agency reviewed those specific sections relevant to their agency subject-matter expertise and purview. Formal transmittal letters from each reviewing agency to MMD, with their respective comments, has been provided to you in this transmittal package.

**Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, General  
Rev. April 2009**

| <b>Agency:</b><br>MMD |                                                    |              | <b>Review Date:</b><br>July 10, 2009                                                                                                                                                                                                            |
|-----------------------|----------------------------------------------------|--------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Item #</b>         | <b>Section/Page<br/>(or general)<br/>Section 2</b> | <b>Topic</b> | <b>Comment</b>                                                                                                                                                                                                                                  |
| 1.                    | General                                            | Maps         | <ol style="list-style-type: none"> <li>1. Please put elevations on contour lines. Please put elevations on plateaus, peaks, and proposed discharge points.</li> <li>2. Please label all monitoring wells and elevations on all maps.</li> </ol> |
| 2.                    | General                                            | Shape Files  | Please provide shape files (GIS/GPS coordinates in UTM coordinates, NAD 83, Zone 13) for wells, arch sites, proposed mine foot print and lay-out(s), and all <u>existing</u> and proposed exploration boreholes.                                |

Section 1 Introduction

| <b>Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 1</b><br><b>Rev. April 2009</b> |                                           |                                         |                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------|-------------------------------------------|-----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Reviewer:</b><br>NMED SWQB Comments<br><b>Agency:</b><br>NMED                                                   |                                           |                                         | <b>Review Date:</b><br>May 29, 2009                                                                                                                                                                                                 |
| Item #                                                                                                             | Section/Page<br>(or general)<br>Section 2 | Topic                                   | Comment                                                                                                                                                                                                                             |
| 3.                                                                                                                 | Section 1.2                               | Discharge water to surface watercourses | Section 1.2 does not indicate whether, where, or how much water would be discharged to surface watercourses. This is addressed elsewhere, but it should be clarified here (such as by indicating the arroyo to receive these waters |

Section 2 Meteorology and Air Quality

| <b>Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 2</b><br><b>Rev. April 2009</b> |              |                                    |                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------|--------------|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Reviewer:</b><br>NMED SWQB Comments<br><br><b>Agency:</b><br>NMED                                               |              |                                    | <b>Review Date:</b><br>May 29, 2009                                                                                                                                                                     |
| Item #                                                                                                             | Section/Page | Topic                              | Comment                                                                                                                                                                                                 |
| 1.                                                                                                                 | Section 2.1  | Location of SOPs                   | SWQB was unable to locate the SOPs described in Section 2.1 and Appendix A.                                                                                                                             |
| 2.                                                                                                                 | Section 2.5  | Editorial—use of word “expedient”. | “The samples will be shipped via the most expedient means available.” A definition of “expedient” is “a means to an end; not necessarily a principled or ethical one”. Please substitute “expeditious”. |

**Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 2  
Rev. April 2009**

| <b>Reviewer:</b><br>NMED SWQB Comments |                          | <b>Review Date:</b><br>May 29, 2009 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----------------------------------------|--------------------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Agency:</b><br>NMED                 |                          |                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Item #</b>                          | <b>Section/Page</b>      | <b>Topic</b>                        | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 1.                                     | General                  | Other Meteorological Data           | Baseline meteorological data should include historical meteorological data collected for more than a one year from stations within the vicinity of the permit area. Data collected should have assurance that the instrumentation and data recorder meet the criteria of either NOAA or WRCC guidelines.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2.                                     | Sections 2.4.2 and 2.4.3 | Radon Detectors                     | The collection and methodology for radiation data described in Sections 2.4.2 and 2.4.3 need to be moved to Section 10.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 3.                                     | Section 2.1              | Precipitation                       | <p>It needs to be stated that the meteorological data collected will include average daily and annual daily precipitation, standard deviations, highs, lows, and years and times when these measurements were or will be taken. This provides a background as to time-frame of (and expected and outlier values) for extremes, highs, lows, and daily and seasonal averages.</p> <p>Also, seasonal averages and extremes within the vicinity should be obtained via NOAA and WRCC data sets to corroborate local meteorological and assess differences between local and regional data.</p> <p>NOAA data may be downloaded at the following site<br/><a href="http://www.weather.gov/climate/xmacis.php?wfo=abq">http://www.weather.gov/climate/xmacis.php?wfo=abq</a></p> <p>WRCC data may be downloaded at the following site<br/><a href="http://www.wrcc.dri.edu/">http://www.wrcc.dri.edu/</a></p> |
| 4.                                     | Section 2.1              | Pan Evaporation values needed       | In order to get an estimate of expected evaporation in the Roca Honda area, the parameter used should be 'pan evaporation'. Pan evaporation integrates evaporation affected by temperature, humidity, solar radiation (which can be affected by air particulates), and wind. For the southwest there are months when pan evaporation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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| <b>Reviewer:</b><br>NMED SWQB Comments |                     | <b>Review Date:</b><br>May 29, 2009 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| <b>Agency:</b><br>NMED                 |                     |                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Item #</b>                          | <b>Section/Page</b> | <b>Topic</b>                        | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                        |                     |                                     | is very high, accounting for most of the annual pan evaporation. If there are no pan evaporation measurements within the vicinity of the proposed site, then a 'Class A' pan evaporation needs to be installed as part of your suite of meteorological station instruments.<br><br>Because pan evaporation rates are actually generally higher than what is achieved in natural evaporative environments, standard practice is to use between 50% and 70% of the pan evaporation rate for design of retention facilities. Additionally, what is needed is to apply reference evaporation rates based on geographic similarities. |
| 5.                                     | Section 2.1         | Wind-speed                          | Background information for wind-speed information should be cited.<br><br>The wind-speed data to be collected needs to provide the high, low, average daily values and principle directions. This provides a background as to time-of-day and season when expected and directional extremes will occur.                                                                                                                                                                                                                                                                                                                          |
| 6.                                     | Section 2.1         | Air quality                         | In the background information please provide what is meant by EPA's classification of the area as an 'attainment' area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 7.                                     | Section 2.2         | Sampling Objectives                 | <ol style="list-style-type: none"> <li>1. In the meteorological section the obvious sampling objective is to collect relevant and accurate <u>baseline</u> meteorological data, temperature, precipitation, wind-speed, RH, etc. . This is not stated in the sampling objective; please include these parameters in your sampling objectives.</li> <li>2. Background radiological conditions - The radiological discussion and sampling protocols need to be moved to Section 10, <i>Radiological Survey Plan</i>.</li> </ol>                                                                                                    |
| 8.                                     | Section 2.3         | 'Data needs'                        | In the first sentence you cite, ' <i>data needs were identified for meteorology data (Baseline Data Summary, Section 2.0, and "Climatology")</i> '. There is no such section in this report. Please correct.                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 9.                                     | Section 2.4         | Methods of                          | As stated in EPA 2000 (see references at the end of this section), the user should                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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| <b>Reviewer:</b><br>NMED SWQB Comments |                     | <b>Review Date:</b><br>May 29, 2009 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <b>Item #</b>                          | <b>Section/Page</b> | <b>Topic</b>                        | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                        |                     | Collection                          | acquire enough meteorological data and at discrete time intervals to ensure worst-case meteorological conditions are adequately represented. It is these worse case scenarios that can cause maximal impacts on topography, vegetation, and air quality.<br><br>Meteorological stations should be set-up meeting NOAA's SOP. Additionally, per standard NOAA data collection methodology, all meteorological data should be collected in 15-minute intervals.                                                                                                                                                                |
| 10.                                    | Section 2.4         | Air Quality Monitoring              | The passage ' <i>Data from the Gulf Mt. Taylor Environmental Report (1979-drafted for the proposed uranium mill) indicated ambient particulate matter in the San Mateo Valley above ambient standards. Radiological data results were not reported and the trace metals were below limits.</i> ' needs a citable reference.<br><br>This information needs to be included in Section 13.                                                                                                                                                                                                                                      |
| 11.                                    | Section 2.4         | Air Quality Monitoring              | The Hi-Vol sampler installation locations and calibration needs to be part of this SAP. Please include.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 12.                                    | Section 2.4.1       | Air Particle Pump                   | Suspended air particles data needs to be identified as one of the parameters to be collected in Table 2-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 13.                                    | Section 2.4.3       | Use of TLD and placement            | <b><u>(Note, the Thermoluminescent Dosimeters (TLDs) information needs to needs to also be addressed in Section 10</u></b><br><br>TLD detectors located at ~1-m above ground level are meant to monitor 'exposure' at chest level of alpha emitting radiation. Because there has been past uranium mining in the area, and the area has high NORM values, there may be elevated radiation due to erosional or wind-born NORM or TENORM material. To assure you have pre-mining baseline and background radon levels measured RHR needs have radon detectors located at the planned waste-rock storage locations, ore storage |

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| <b>Reviewer:</b><br>NMED SWQB Comments |                          | <b>Review Date:</b><br>May 29, 2009                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| <b>Item #</b>                          | <b>Section/Page</b>      | <b>Topic</b>                                                 | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                        |                          |                                                              | facilities, vents, shafts, canyon apexes, stream banks downstream from the mining, sites of existing exploration boreholes, locations where mine water is discharged. Therefore numerous TLDs need to be placed around the site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 14.                                    | Section 2.4.2            | Radon Detectors                                              | <b><u>(Note, the information on radon TLD detectors needs to also be addressed in Section 10</u></b><br>Because there has been past uranium mining in the area, there may be elevated radiation due to erosional or wind-born NORM or TENORM material. In order to evaluate baseline alpha radiation, alpha-emitting radiation needs to be measured <u>at ground level</u> throughout the site. Therefore, RHR needs take baseline measurements of alpha radiation using air- or gas-proportional detectors. Measurements need to be taken at the planned waste-rock storage locations, ore storage facilities, vents, shafts, canyon apexes, stream banks downstream from the mining, sites of existing exploration boreholes, and locations where mine water is discharged. The intention is to detect whether the RHR mining activity has introduced elevated values of alpha emitting particles to the surface when similar measurements are taken during and after mining ceases. |
|                                        | Sections 2.4.2 and 2.4.3 | Radon Detectors                                              | The text describing the installation of the alpha and gamma dosimeters needs to be put in a separate QA/QC procedural section. (Again, all of text on radiation needs to be moved to section 10.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                        | Section 2.8.1            | Meteorological Station – Instrument ranges and sensitivities | There are no instrument specifications, operating ranges and sensitivities in this section. Please include.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|                                        | Section 2.8.1            | Meteorological Station - units                               | To be 'defensible' and consistent with other sanctioned weather station data, the meteorological data needs to be collected, verified, and monitored per NOAA sanctioned guidelines. Standardized SI units for recording data need to be specified as listed below.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |



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| <b>Agency:</b><br>NMED                 |                                     |

| Item #                                                        | Section/Page  | Topic                               | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
|---------------------------------------------------------------|---------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|------------|-------|--------|-------------------|---------------|---------------|--|------------|--------|--|--|-----------------------------|-------|----|------|-------------------------------|----|---|-----|---------------------------------|----|----|------|------------------------|------|-----|------|----------------------------|------|---|-----|------------------------|---------|-----|------|-----------------------------|----------|-------|-------|----------------------------------------|--------|----|-----|---------------------------------------------------------------|---------|----|------|------------------------------|---------|-------|------|------------------------------------------------|---------|----|------|
|                                                               |               |                                     | <table border="1"> <thead> <tr> <th>Parameter</th> <th>Short Name</th> <th>Units</th> <th>Format</th> </tr> </thead> <tbody> <tr> <td>(1) DateTimeStamp</td> <td>DateTimeStamp</td> <td>m/d/yyyy h:mm</td> <td></td> </tr> <tr> <td>(2) Record</td> <td>Record</td> <td></td> <td></td> </tr> <tr> <td>(3) Average Air Temperature</td> <td>ATemp</td> <td>°C</td> <td>00.0</td> </tr> <tr> <td>(4) Average Relative Humidity</td> <td>RH</td> <td>%</td> <td>000</td> </tr> <tr> <td>(5) Average Barometric Pressure</td> <td>BP</td> <td>mb</td> <td>0000</td> </tr> <tr> <td>(6) Average Wind Speed</td> <td>WSpd</td> <td>m/s</td> <td>00.0</td> </tr> <tr> <td>(7) Average Wind Direction</td> <td>Wdir</td> <td>°</td> <td>000</td> </tr> <tr> <td>(8) Maximum Wind Speed</td> <td>MaxWspd</td> <td>m/s</td> <td>00.0</td> </tr> <tr> <td>(9) Maximum Wind Speed Time</td> <td>MaxWspdT</td> <td>hh:mm</td> <td>hh:mm</td> </tr> <tr> <td>(10) Wind Direction Standard Deviation</td> <td>SDWDir</td> <td>sd</td> <td>000</td> </tr> <tr> <td>(11) Total Precipitation<br/>(recorded in 15 minute intervals)</td> <td>TotPrcp</td> <td>mm</td> <td>00.0</td> </tr> <tr> <td>(12) Average Battery Voltage</td> <td>AvgVolt</td> <td>volts</td> <td>00.0</td> </tr> <tr> <td>(13) Cumulative Precipitation (24 hour period)</td> <td>CumPrcp</td> <td>mm</td> <td>00.0</td> </tr> </tbody> </table> | Parameter | Short Name | Units | Format | (1) DateTimeStamp | DateTimeStamp | m/d/yyyy h:mm |  | (2) Record | Record |  |  | (3) Average Air Temperature | ATemp | °C | 00.0 | (4) Average Relative Humidity | RH | % | 000 | (5) Average Barometric Pressure | BP | mb | 0000 | (6) Average Wind Speed | WSpd | m/s | 00.0 | (7) Average Wind Direction | Wdir | ° | 000 | (8) Maximum Wind Speed | MaxWspd | m/s | 00.0 | (9) Maximum Wind Speed Time | MaxWspdT | hh:mm | hh:mm | (10) Wind Direction Standard Deviation | SDWDir | sd | 000 | (11) Total Precipitation<br>(recorded in 15 minute intervals) | TotPrcp | mm | 00.0 | (12) Average Battery Voltage | AvgVolt | volts | 00.0 | (13) Cumulative Precipitation (24 hour period) | CumPrcp | mm | 00.0 |
| Parameter                                                     | Short Name    | Units                               | Format                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (1) DateTimeStamp                                             | DateTimeStamp | m/d/yyyy h:mm                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (2) Record                                                    | Record        |                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (3) Average Air Temperature                                   | ATemp         | °C                                  | 00.0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (4) Average Relative Humidity                                 | RH            | %                                   | 000                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (5) Average Barometric Pressure                               | BP            | mb                                  | 0000                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (6) Average Wind Speed                                        | WSpd          | m/s                                 | 00.0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (7) Average Wind Direction                                    | Wdir          | °                                   | 000                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (8) Maximum Wind Speed                                        | MaxWspd       | m/s                                 | 00.0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (9) Maximum Wind Speed Time                                   | MaxWspdT      | hh:mm                               | hh:mm                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (10) Wind Direction Standard Deviation                        | SDWDir        | sd                                  | 000                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (11) Total Precipitation<br>(recorded in 15 minute intervals) | TotPrcp       | mm                                  | 00.0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (12) Average Battery Voltage                                  | AvgVolt       | volts                               | 00.0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
| (13) Cumulative Precipitation (24 hour period)                | CumPrcp       | mm                                  | 00.0                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
|                                                               | Section 2.8.1 | Meteorological Station – general    | General – The plan needs to specifically state all the required QA/QC checks (item by item) are performed per the <i>Campbell Scientific</i> CR1000 standard operating procedures (SOP) for the Meteorological Monitoring Station.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |
|                                                               | Section 2.8.1 | Meteorological Station – wind-speed | Measuring wind-speed –There should be assurance that common data collection errors are avoided.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |           |            |       |        |                   |               |               |  |            |        |  |  |                             |       |    |      |                               |    |   |     |                                 |    |    |      |                        |      |     |      |                            |      |   |     |                        |         |     |      |                             |          |       |       |                                        |        |    |     |                                                               |         |    |      |                              |         |       |      |                                                |         |    |      |

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|                                                                                                                             |                     |                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------------------------------------------------------------------------|---------------------|-------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Reviewer:</b><br>NMED SWQB Comments                                                                                      |                     | <b>Review Date:</b><br>May 29, 2009 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Agency:</b><br>NMED                                                                                                      |                     |                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Item #</b>                                                                                                               | <b>Section/Page</b> | <b>Topic</b>                        | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                                                                                             |                     |                                     | <p><b>It should be stated</b> that a weekly orientation check is performed to ensure the wind speed indicator is always pointing true north.</p> <p>Where is the anemometer located above the ground surface, 2-, 5-, or 10-m? The plan must specify the location.</p>                                                                                                                                                                                                                                                        |
|                                                                                                                             | Section 2.8.1       | Meteorological Station –            | <p>Measuring Precipitation - There should be assurance that common data collection errors are avoided.</p> <p><b>It should be stated that</b> the tipping bucket rain gauges are functioning properly. (These tend to jam up. Common problems arise due to roosting birds ‘tampering’ with the instrument causing it to clog, get stuck, or become off-balance.) A weekly check for these types of malfunctions needs to be specified in the SOP. RHR states they are using a Campbell Scientific meteorological station.</p> |
|                                                                                                                             | 2.10                | EPA references                      | The EPA 2007 references are not adequately identified. Please provide a full citation in the reference section.                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p>References:<br/>EPA, 2000. Meteorological Monitoring Guidance for Regulatory Modeling Applications EPA-454/R-99-005.</p> |                     |                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|----------------|-------------------------|-------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Item #         | Section/Page            | Topic                                                 | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 1.             | Section 2.4.2 and 2.4.3 | Measurement of alpha radiation                        | The collection and methodology for radiation data described in Sections 2.4.2 and 2.4.3 need to be moved to Section 10.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2.             | Section 2.1             | Precipitation                                         | It needs to be stated that the meteorological data collected will include average daily and annual daily precipitation, standard deviations, highs, lows, and years and times when these measurements were or will be taken. This provides a background as to time-frame of (and expected and outlier values) for extremes, highs, lows, and daily and seasonal averages.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 3.             | Section 2.1             | Lake evaporation not appropriate for arid environment | The value of a 'lake evaporation' cited for typical evaporation values in this area is not appropriate. Lake evaporation measurements are interrelated with, and affected by, the large water body of the 'lake'. The lake, or large water body, will affect the parameter values that go into a 'lake evaporation' measurement and can be extremely different than what controls evaporation in arid environments (such as Roca Honda). Inputs to lake evaporation, such as relative humidity, the heat storage capacity of a large water body (which includes depth, turbidity, surface area) and the outgoing short- and long-wave radiation (also affected by large water bodies) and air temperature just above the water surface, wind (both affected by the lake surface area and depth) are very different than that in an arid environment. Please take out any reference to lake evaporation values |
| 4.             | Section 2.1             | Pan Evaporation values needed                         | In order to get an estimate of expected evaporation in the Roca Honda area, the parameter used should be 'pan evaporation'. Pan evaporation integrates evaporation affected by temperature, humidity, solar radiation (which can be affected by air particulates), and wind. For the southwest there are months when pan evaporation is very high, accounting for most of the annual pan evaporation. If there are no pan evaporation measurements within the vicinity of the proposed site, then a 'Class A' pan evaporation needs to be installed as part of your suite of meteorological station instruments.                                                                                                                                                                                                                                                                                              |
| 5.             | Section 2.1             | Wind-speed                                            | Background information for wind-speed information should be cited.<br><br>The wind-speed data to be collected needs to provide the high, low, average daily values and principle directions. This provides a background as to time-of-day and season when expected and directional extremes will occur.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 6.             | Section 2.1             | Air quality                                           | In the background information please provide what is meant by EPA's classification of the area as an 'attainment' area.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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| Item #         | Section/Page | Topic                     | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 7.             | Section 2.2  | Sampling Objectives       | <p>3. In the meteorological section the obvious sampling objective is to collect meteorological data, temperature, precipitation, wind-speed, RH, etc. . This is not stated in the sampling objective; please include these parameters in your sampling objectives.</p> <p>4. Background radiological conditions - The radiological discussion and sampling protocols need to be moved to Section 10, <i>Radiological Survey Plan</i>.</p>                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 8.             | Section 2.3  | 'Data needs'              | In the first sentence you cite, ' <i>data needs were identified for meteorology data (Baseline Data Summary, Section 2.0, and "Climatology")</i> '. There is no such section in this report. Please correct.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 9.             | Section 2.4  | Location of met stations. | Due to the variability in topography and land orientation there will be multiple and variable micro-climates in the proposed mining area. This variability will affect transport of dust, dust collection and dust accumulation points. Depending on orientation and area (i.e., north or south facing slopes, within a small canyon or open mesa) there will be variable diurnal wind speed and direction and temperatures and relatively high or low pan evaporation within the mine site. Therefore, there needs to be more than one meteorological station installed to collect site-wide meteorological variability. A meteorological station, or a 'mini'- stations, should be installed on high ridges, north facing and south facing valleys and coves, open lower and upper plateaus, proposed haul roads, along the flatter areas of the stream banks. |
| 10.            | Section 2.4  | Methods of Collection     | <p>As stated in EPA 2000, the user should acquire enough meteorological data and at discrete time intervals to ensure worst-case meteorological conditions are adequately represented. It is these worse case scenarios that can cause maximal impacts on topography, vegetation, and air quality.</p> <p>Meteorological stations should be set-up meeting NOAA's SOP. Additionally, per standard NOAA data collection methodology, all meteorological data should be collected in 15-minute intervals.</p>                                                                                                                                                                                                                                                                                                                                                      |
| 11.            | Section 2.4  | Air Quality Monitoring    | The passage ' <i>Data from the Gulf Mt. Taylor Environmental Report (1979-drafted for the proposed uranium mill)</i> indicated ambient particulate matter in the San Mateo Valley above ambient standards.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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| <b>Agency:</b><br>MMD |                          |                                                              | <b>Review Date</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                  |                   |              |               |                    |               |               |  |
|-----------------------|--------------------------|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|--------------|---------------|--------------------|---------------|---------------|--|
| <b>Item #</b>         | <b>Section/Page</b>      | <b>Topic</b>                                                 | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                  |                   |              |               |                    |               |               |  |
|                       |                          |                                                              | <p><i>Radiological data results were not reported and the trace metals were below limits.</i> needs a citable reference.</p> <p>This information needs to be included in Section 13.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                  |                   |              |               |                    |               |               |  |
| 12.                   | Section 2.4              | Air Quality Monitoring                                       | The Hi-Vol sampler installation locations and calibration needs to be part of this SAP. Please include.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                  |                   |              |               |                    |               |               |  |
| 13.                   | Section 2.4.1            | Air Particle Pump                                            | Suspended air particles data needs to be identified as one of the parameters to be collected in Table 2-1.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                  |                   |              |               |                    |               |               |  |
| 14.                   | Section 2.4.2            | Use of TLD and placement                                     | <b><u>Note, the Thermoluminescent Dosimeters (TLDs) information needs to needs to also be addressed in Section 10</u></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                  |                   |              |               |                    |               |               |  |
| 15.                   | Section 2.4.2            | Radon Detectors                                              | <b><u>Note, the information on radon detectors needs to also be addressed in Section 10</u></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                  |                   |              |               |                    |               |               |  |
| 16.                   | Sections 2.4.2 and 2.4.3 | Radon Detectors                                              | The text describing the installation of the alpha and gamma dosimeters needs to be put in a separate QA/QC procedural section. (Again, all of text on radiation needs to be moved to section 10.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                  |                   |              |               |                    |               |               |  |
| 17.                   | Section 2.8.1            | Meteorological Station – Instrument ranges and sensitivities | There are no instrument specifications, operating ranges and sensitivities in this section. Please include.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                  |                   |              |               |                    |               |               |  |
| 18.                   | Section 2.8.1            | Meteorological Station - units                               | <p>To be 'defensible' and consistent with other sanctioned weather station data, the meteorological data needs to be collected, verified, and monitored per NOAA sanctioned guidelines. Standardized SI units for recording data need to be specified as listed below.</p> <table border="0" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;"><u>Parameter</u></th> <th style="text-align: left;"><u>Short Name</u></th> <th style="text-align: left;"><u>Units</u></th> <th style="text-align: left;"><u>Format</u></th> </tr> </thead> <tbody> <tr> <td>(14) DateTimeStamp</td> <td>DateTimeStamp</td> <td>m/d/yyyy h:mm</td> <td></td> </tr> </tbody> </table> | <u>Parameter</u> | <u>Short Name</u> | <u>Units</u> | <u>Format</u> | (14) DateTimeStamp | DateTimeStamp | m/d/yyyy h:mm |  |
| <u>Parameter</u>      | <u>Short Name</u>        | <u>Units</u>                                                 | <u>Format</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                  |                   |              |               |                    |               |               |  |
| (14) DateTimeStamp    | DateTimeStamp            | m/d/yyyy h:mm                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                  |                   |              |               |                    |               |               |  |

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| Item #         | Section/Page  | Topic                               | Comment                                                                                                                                                                                                                                                                                                                                                                              |          |             |
|                |               |                                     | (15) Record                                                                                                                                                                                                                                                                                                                                                                          | Record   |             |
|                |               |                                     | (16) Average Air Temperature                                                                                                                                                                                                                                                                                                                                                         | ATemp    | °C 00.0     |
|                |               |                                     | (17) Average Relative Humidity                                                                                                                                                                                                                                                                                                                                                       | RH       | % 000       |
|                |               |                                     | (18) Average Barometric Pressure                                                                                                                                                                                                                                                                                                                                                     | BP       | mb 0000     |
|                |               |                                     | (19) Average Wind Speed                                                                                                                                                                                                                                                                                                                                                              | WSpd     | m/s 00.0    |
|                |               |                                     | (20) Average Wind Direction                                                                                                                                                                                                                                                                                                                                                          | Wdir     | ° 000       |
|                |               |                                     | (21) Maximum Wind Speed                                                                                                                                                                                                                                                                                                                                                              | MaxWspd  | m/s 00.0    |
|                |               |                                     | (22) Maximum Wind Speed Time                                                                                                                                                                                                                                                                                                                                                         | MaxWspdT | hh:mm hh:mm |
|                |               |                                     | (23) Wind Direction Standard Deviation                                                                                                                                                                                                                                                                                                                                               | SDWDir   | sd 000      |
|                |               |                                     | (24) Total Precipitation<br>(recorded in 15 minute intervals)                                                                                                                                                                                                                                                                                                                        | TotPrcp  | mm 00.0     |
|                |               |                                     | (25) Average Battery Voltage                                                                                                                                                                                                                                                                                                                                                         | AvgVolt  | volts 00.0  |
|                |               |                                     | (26) Cumulative Precipitation (24 hour period)                                                                                                                                                                                                                                                                                                                                       | CumPrcp  | mm 00.0     |
| 19.            | Section 2.8.1 | Meteorological Station – general    | General – The plan needs to specifically state all the required QA/QC checks (item by item) are performed per the <i>Campbell Scientific</i> CR1000 standard operating procedures (SOP) for the Meteorological Monitoring Station.                                                                                                                                                   |          |             |
| 20.            | Section 2.8.1 | Meteorological Station – wind-speed | <p>Measuring wind-speed –There should be assurance that common data collection errors are avoided.</p> <p><b><u>It should be stated</u></b> that a weekly orientation check is performed to ensure the wind speed indicator is always pointing true north.</p> <p>Where is the anemometer located above the ground surface, 2-, 5-, or 10-m? The plan must specify the location.</p> |          |             |

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|--------------------------------------------------------------------------------------------------------------------|---------------------|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Agency:</b><br>MMD                                                                                              |                     |                          | <b>Review Date</b>                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Item #</b>                                                                                                      | <b>Section/Page</b> | <b>Topic</b>             | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 21.                                                                                                                | Section 2.8.1       | Meteorological Station – | Measuring Precipitation - There should be assurance that common data collection errors are avoided.<br><br><b><u>It should be stated that</u></b> the tipping bucket rain gauges are functioning properly. (These tend to jam up. Common problems arise due to roosting birds ‘tampering’ with the instrument causing it to clog, get stuck, or become off-balance.) A weekly check for these types of malfunctions needs to be specified in the SOP. |
| 22.                                                                                                                | 2.10                | EPA references           | The EPA 2007 references are not adequately identified. Please provide more specific identification for the EPA 2007 references.                                                                                                                                                                                                                                                                                                                       |
| References:<br>EPA, 2000. Meteorological Monitoring Guidance for Regulatory Modeling Applications EPA-454/R-99-005 |                     |                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

Section 3 Topography

| <b>Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 3<br/>Rev. April 2009</b> |                     |                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| <b>Agency:</b><br>MMD                                                                                        |                     |                                         | <b>Review Date:</b><br>July 10, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Item #</b>                                                                                                | <b>Section/Page</b> | <b>Topic</b>                            | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                                                                              | Figure 3-1          | Contour elevations                      | Please put elevations on the contour lines.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                                                                              | Figure 3-1          | Observation well - labels               | Please label observation wells on map and include elevations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|                                                                                                              | Figure 3-1          | Road labels                             | Please provide labeling of all paved and dirt roads.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|                                                                                                              | Figure 3-1          | Projected mine operations and buildings | Data collection that should be associated with proposed building locations. Consequently, please provide a general lay-out of mine operations: buildings, ponds, vents, waste piles, burrow locations, mine discharge pipes, parking, and sidewalks etc., etc., such that this layout will minimally impact canyon and arroyo up-cutting gouges and erosion. Additionally, it should be mentioned that the footprint of the mine and mine operations, because of data collection, as describe in the SAP, will may be modified due to knowledge, inferences and conclusions that the data will provide. |



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| <b>Reviewer:</b><br>NMED SWQB Comments |                     |                       | <b>Review Date:</b><br>May 29, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------------------------------|---------------------|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Agency:</b><br>NMED                 |                     |                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Item #</b>                          | <b>Section/Page</b> | <b>Topic</b>          | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 1.                                     | Section 3.4         | Stream-channel survey | From Section 3.4, "Stream-bed contours will be prepared using aerial photographs for the area immediately adjacent to the permit area and ground level surveys for areas further downgradient (as described in Section 8 of this SAP)." The pre-mining stream channel morphology should be better defined, including channel plan, profile, and cross-section. These conventional surveys should be sufficient in number and location to characterize pre-mining channel morphology. These pre-mining data should be used to design reclamation channels that are naturally stable. (This appears to be at least partially addressed in Section 8.5.1.8.) |

## Section 4 Vegetation

| <b>Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 4<br/>Rev. April 2009</b> |                      |                                                            |                                                                                 |
|--------------------------------------------------------------------------------------------------------------|----------------------|------------------------------------------------------------|---------------------------------------------------------------------------------|
| <b>Agency:</b><br>MMD                                                                                        |                      |                                                            | <b>Review Date 5/26/09</b>                                                      |
| <b>Item #</b>                                                                                                | <b>Section/Page</b>  | <b>Topic</b>                                               | <b>Comment</b>                                                                  |
| 1.                                                                                                           | Section 4.1          | Introduction and Background                                | Copies of Wood 2006a & 2006b should be provided for our review.                 |
| 2.                                                                                                           | Figures 4-1 thru 4-3 | Maps                                                       | All maps need to show elevations and/or contour intervals.                      |
| 3.                                                                                                           | 4.3, pg. 4-3         | List of Data to be Collected                               | Provide rationale for transect & enclosure locations and reference area chosen. |
| 4.                                                                                                           | “ “                  | “ “                                                        | Discussion needed on pre-mining impacts from livestock grazing. (see 17. below) |
| 5.                                                                                                           | Fig. 4-2             | Vegetation Transect Line Locations and Enclosure Locations | Explain what the symbol “Pool” represents.                                      |
| 6.                                                                                                           | Fig. 4-3             | Transect Line Locations and Enclosure Locations            | Explain why no arroyo transects are proposed in the reference area.             |
| 7.                                                                                                           | Section 4.4.1.3      | Invasive and Non- Native Species                           | Which list of noxious weeds will be used (e.g., NM Dept. of Ag.)?               |
| 8.                                                                                                           | Section 4.4.2        | Vegetation Descriptions                                    | Veg. cover, total grd. Cover, etc. will be documented for reference area, too?  |
| 9.                                                                                                           | Section 4.4.2.2      | Data Collect...                                            | What is the purpose of arroyo transects & how will they be taken?               |
| 10.                                                                                                          | “ “                  | “ “                                                        | Are all six veg. types found in the reference area?                             |

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|                       |                     |                                            |                                                                                                  |
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| <b>Agency:</b><br>MMD |                     |                                            | <b>Review Date</b> 5/26/09                                                                       |
| <b>Item #</b>         | <b>Section/Page</b> | <b>Topic</b>                               | <b>Comment</b>                                                                                   |
| 11.                   | " "                 | " "                                        | For point-intercept method, 15 transects minimum are required (MMD Guidelines).                  |
| 12.                   | " "                 | " "                                        | For belt transects, 15 transects minimum are required (MMD Guidelines).                          |
| 13.                   | " "                 | " "                                        | Insert the word herbaceous in the following, "All herbaceous plant material".                    |
| 14.                   | Section 4.9         | Brief Discussion<br>Supporting<br>Proposal | Explain how ocular estimates of relative abundance will mitigate shortcomings of point intercept |
| 15.                   | Section 4.10        | References                                 | Were NRCS rangeland conditions reviewed and considered?                                          |

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|                                        |                     |                                                                  |                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Reviewer:</b><br>NMED SWQB Comments |                     |                                                                  | <b>Review Date:</b><br>May 29, 2009                                                                                                                                                                                                                                                                                                                                       |
| <b>Agency:</b><br>NMED                 |                     |                                                                  |                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Item #</b>                          | <b>Section/Page</b> | <b>Topic</b>                                                     | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                            |
| 1.                                     | Section 4.3         | native<br>riparian/wetland<br>vegetation along<br>unnamed arroyo | This section makes reference to "potential impacts of high water volume discharge in an unnamed arroyo draining to San Mateo Creek". Associated data should support reclamation that includes the use of native woody riparian and/or wetland species in areas that support such vegetation -- whether or not those areas supported such vegetation before the discharge. |

## Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 4

| <b>Agency:</b><br>NM Department of Game and Fish |              |                                               | <b>Review Date:</b><br>May 21, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| Item #                                           | Section/Page | Topic                                         | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 1.                                               | Section 4    | Vegetation                                    | Introduction and Background. NMDGF is in possession of the Wood et al. 2006 report regarding the special status plant species survey of Section 16. We do not have a copy of the report for the Sections 9 and 10 surveys conducted that same year. Please provide NMDGF with a copy of that report.                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 2.                                               | Figure 4.3   | Transect Line Locations in the Reference Area | We advise that vegetation types be indicated on the reference area map that corresponds to those delineated for the project area. Also, we suggest that the number of transects be identified in each vegetation type per location (project area and reference). Also, productivity exclosures in the reference area should be added or an explanation provided for their absence.                                                                                                                                                                                                                                                                                                                                                                    |
| 3.                                               | 4.4.2.2      | Data Collection and Analysis of Cover         | How will overlapping hits on the line intercept transects be recorded and interpreted? Also, in addition to height, we recommend that diameter at ground level be recorded for juniper and pinon trees. The project area supports a large number of old trees and for these species; diameter is a better index than height to approximate the age of the tree. Given the importance of large diameter pinon and juniper trees for bat roost needs, particularly summer maternity roosts, we recommend that cores are collected from a subset of measured trees and that site-specific correlation of diameter with age is performed as well (for the purpose of documenting the extent of mature woodland, as opposed to recent brush encroachment). |
| 4.                                               | 4.8          | Laboratory and Field Quality Assurance Plan.  | The personnel section of the QAP has been cut and pasted from the Wildlife section. The wildlife biologist qualifications need to be replaced with qualifications specific to botany personnel.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

Section 5 Wildlife

| Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 5 |              |                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| Agency:<br>NM Department of Game and Fish                                         |              |                              | Review Date:<br>May 21, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Item #                                                                            | Section/Page | Topic                        | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 1.                                                                                | Section 5    | Permits                      | NMDGF recommends that the project consultants obtain a scientific take permit from the state. While permits are not strictly required for this type of activity, if a state threatened or endangered species is inadvertently destroyed during the survey work, in the absence of a permit, the take would be a violation of state law. Permit application forms can be found at <a href="http://www.wildlife.state.nm.us/conservation/documentsLwildlifeforscientificeducation.pdf">http://www.wildlife.state.nm.us/conservation/documentsLwildlifeforscientificeducation.pdf</a> .                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 2.                                                                                | Section 5    | Introduction and Background. | NMDGF is in possession of the Wood et al. 2006 report for the Section 16 special status wildlife species survey. We do not have a copy of the report for the Section 9 and 10 surveys conducted that same year, and request that a copy be provided to us. Only those species with federal status were included in the 2006 report. However, there are a number of state listed and sensitive species that are not included in the survey, notably the state threatened gray vireo and spotted bat, for which habitat may be present on the project area. We have enclosed a list of special status species known to occur in McKinley and/or Cibola County, and request that targeted surveys be conducted for state protected species without federal status, especially the gray vireo and spotted bat.<br><br><i>Existing Habitat.</i> Scientific binomial designations for plant species should be used when discussing them for the first time in the document. Also note that Colorado rubberweed, <i>Hymenoxys richardsonii</i> , is a perennial sub-shrub, not an annual as described in the SAP. |
| 3.                                                                                | Figure 5-1   | Wildlife Habitat Types.      | We recommend that the SAP depicts the "potential wetland riparian areas within and below the permit area," referred to on Table 5-1, and to briefly describe these areas in the text. Also, depict the "intermittent/topographic" habitat types (rock/ cliffside and arroyo/ drainages) as referred to in 5.4.2.2 Sampling Design, and describe their extent and nature in the text.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 4.                                                                                | 5.4.1        | Wildlife Species Inventory   | The surveys conducted in 2006 on Section 16 do not provide full baseline data regarding comprehensive lists of species and habitat types and associations. Surveys were conducted only in the fall and winter and habitat associations are reported only for species with federal special                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

**Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 5**

| <b>Agency:</b><br>NM Department of Game and Fish |                     |                                         | <b>Review Date:</b><br>May 21, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Item #</b>                                    | <b>Section/Page</b> | <b>Topic</b>                            | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|                                                  |                     |                                         | status. We request that similar transect surveys be conducted in the spring and summer seasons and habitat associations be reported for all species observed. As noted above, we are not in possession of survey reports from Sections 9 and 10.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 5.                                               | 5.4.2.3             | Field Methodology.                      | We recommend that you provide detailed survey protocols for all species groups listed. Use federal or state standard protocols for special status species where available (NMDGF can provide specific protocols for burrowing owl, raptors and gray vireo). Also, we recommend that the SAP describe and identify the location of standing water where bat netting will take place as well as other wildlife-available waters on or near the permit area. Due to the potential presence of a number of sensitive bat species, and one threatened species, the apparent presence of good roosting habitat (older junipers with dead branches and loose bark and deeply creviced, vertical rock faces) and the limited availability of appropriate netting locations, NMDGF recommends that netting surveys be supplemented with acoustic inventory techniques. |
| 6.                                               | Figure 5-2          | Wildlife Survey and Transect Locations. | We recommend that survey stations for medium-large mammals and herpeto/faunal small mammals in Section 10 be added, or that an explanation is provided for why no survey stations are located in that section.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

Section 6 Topsoil

| <b>Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 6<br/>Rev. April 2009</b> |                     |                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| <b>Agency:</b><br>MMD                                                                                        |                     |                | <b>Review Date:</b><br>May 27, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Item #</b>                                                                                                | <b>Section/Page</b> | <b>Topic</b>   | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>1.</b>                                                                                                    | <b>Section 6</b>    | General        | <p>The term “topsoil” is usually restricted to A-horizons. In semi-arid climates good suitable materials may be salvaged from A+B+C and even some - materials. A better term for salvageable materials should be referred to as “suitable topdressing,” “suitable soils” or similar.</p> <p>Not all materials identified as “high quality” will be salvageable. There may be good quality resources on slopes too steep to salvage or within areas to avoid. Calculations of salvage volumes should consider these limitations. RHR should also allow for some loss during handling/storage, and higher post-reclamation compaction, collectively estimated as 10-15% loss by many operators.</p> <p>MMD recommends that steep slopes be reclaimed with materials containing high proportions (up to 60%, depending on matrix texture) of gravel or rock. RHR should plan to identify and handle these materials separately.</p> <p>Depending upon the variability of soils in the mine design limits, soil quality and intensity of sampling in this effort, RHR may be required to do additional mapping and sampling before mine facilities are constructed.</p> <p>Saline and sodic soils may be acceptable for salvage, depending upon the degree of effect, texture, slope position and other factors at the time of reclamation.</p> |
| <b>2.</b>                                                                                                    | Section 6.4         | <b>Methods</b> | RHR can easily misjudge salvageable topsoil with inaccurate information, with expensive consequences. The lack of alignment between USFS and NRCS map units (Fig. 6-2) is                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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| <b>Agency:</b><br>MMD |                     |                           | <b>Review Date:</b><br>May 27, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| <b>Item #</b>         | <b>Section/Page</b> | <b>Topic</b>              | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                       |                     |                           | disconcerting and should be resolved. A soil scientist with a good deal of experience in “local” soils should be used to characterize soil resources for RHR. Many characteristics such as salinity can be extremely difficult to determine in the field without a keen eye and a “feel” for appropriate laboratory sampling.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>3.</b>             | <b>Section 6.4</b>  | <b>Composite sampling</b> | <p>MMD will not accept composite sampling for soil character. Soils in the area transition from one type to another in ways that do not always equate to topographic or vegetation changes.</p> <p>An arbitrary number of samples should not be determined beforehand. Each common soil component (not unit!) should be sampled at least once within each unit and fully exposed by <u>backhoe</u> for a thorough view/characterization of the profile.</p> <p>The field soil scientist should have some leeway if field checks reveal more or less variability than is indicated in higher-order maps. Again, MMD stresses that an experienced soil mapper at the beginning can prevent expensive mistakes at the end of the salvage/storage/reclaim cycle.</p>                                                                                                                                                                                                                                                      |
| <b>4.</b>             | <b>Section 6.4</b>  | Depth-wise sampling       | <p>Soils in the area will have well defined strata that will not correspond with arbitrary sampling depth intervals such as 0”-6”. RHR should NOT sample from specified depth intervals but attempt to define individual horizons at a sampling location and the depth of “breaks” or transition zones between them. By locating breaks, a more accurate salvage volume can be estimated for a particular area without mixing horizons of different character.</p> <p>See item 2 above: A soil scientist may randomly or (better) locate sampling points within chrono- or toposequences to better characterize an “average” and “deviation” of soils from existing maps for an area. Each location may be described by changes in texture, color, etc. from location to location, though sampling for laboratory tests from a single “representative” type-profile may suffice for an area of similar soil.</p> <p>Unless buried soils are encountered or expected, RHR should limit sampling to materials above</p> |



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| <b>Agency:</b><br>MMD |                     |              | <b>Review Date:</b><br>May 27, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| <b>Item #</b>         | <b>Section/Page</b> | <b>Topic</b> | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                       |                     |              | Ck horizons that have >10% carbonates or any induration.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 5.                    | Table 6-3           | Parameters   | <p>The field soil scientist should be prepared to and frequently perform analysis of soils for pH and electrical conductivity in order to “field-calibrate” for these important parameters and judge sampling needs.</p> <p>In addition to a hydrometer texture, please sieve for the break between medium, fine and very fine sands (#60 and #140 sieves). Sieve data should be proportioned to total sample mass (from hydrometer data). This will enable better RUSLE or SedCad modeling later.</p> <p>Rather than test for macro- and micronutrients RHR should instead test samples for soluble B, hot-water soluble Se, and total U, Ra (or gross alpha and beta in lieu of U, Ra). N-P-K testing may be helpful immediately before reclamation, tested from stockpiled materials, though N and P values will be reliably below any agronomic values.</p> <p>Please add inorganic carbon testing to the parameter suite. (to the nearest 0.1% CaCO<sub>3</sub> equiv.)</p> <p>Soil SAR (sodicity) data should include component parameters of paste Ca, Mg and Na in units of me/L</p> |

Section 7 Geology

| <b>Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 7<br/>Rev. April 2009</b> |                                      |              |                                                                                                                                 |
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| <b>Reviewer:</b><br><b>Agency:</b><br>MMD                                                                    |                                      |              | <b>Review Date:</b><br>July 10, 2009                                                                                            |
| <b>Item #</b>                                                                                                | <b>Section/Page<br/>(or general)</b> | <b>Topic</b> | <b>Comment</b>                                                                                                                  |
| 1.                                                                                                           | Section 7/ page<br>18                | Geology      | General comment: the thickness of the Dilco Coal is probably less than five feet thick.                                         |
| 2.                                                                                                           | Section 7/ Page<br>12                | Geology      | Include a set of the recent borehole logs from 2007 with the tops marked and target ore zones indicated as RHR interprets them. |

Section 8 Surface Water

| <b>Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 8<br/>Rev. April 2009</b> |                                            |                      |                                                                                                                                                                                                                                                                                               |
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| <b>Agency:</b><br>OSE                                                                                        |                                            |                      | <b>Review Date:</b><br>May 29, 2009                                                                                                                                                                                                                                                           |
| <b>Item #</b>                                                                                                | <b>Section/Page</b>                        | <b>Topic</b>         | <b>Comment</b>                                                                                                                                                                                                                                                                                |
| <b>1.</b>                                                                                                    | <u>Section 8.1.4,</u><br><u>page 8-12.</u> | springs              | The springs mentioned are dismissed as having any connection to the proposed mine dewatering. In the final report for the SAP results, please provide a more detailed explanation which formations the spring are emanating from and why that excludes any connection to the mine dewatering. |
| <b>2.</b>                                                                                                    | <u>Section 8.1.4,</u><br><u>page 8-12.</u> | Surface water rights | In the final report for the SAP results, please provide details on surface water rights associated with the springs in the vicinity of San Mateo Creek and the proposed Roca Honda Mine.                                                                                                      |

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| <b>Agency:</b><br>MMD |                                      | <b>Review Date :</b><br>May 8, 2009                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| <b>Item #</b>         | <b>Section/Page<br/>(or general)</b> | <b>Topic</b>                                                               | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 1.                    | Sections , 8.1,<br>8.2, 8.3          | General                                                                    | The plan does a fairly good job of identifying the data gaps and subsequent data needs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| 2.                    | Sections. 8.1,<br>8.2, 8.3           | General                                                                    | The text needs to be clarified throughout by making more consistent and specific reference to laboratory analysis for WQCC water quality standards and constituents instead of “other water quality parameters”. This is in addition to all the other parameters (cations/anions, volatiles, semi-volatiles) proposed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3.                    | Section 8.5.1.3                      | <b><u>Baseline Water Quality –<br/>_division of<br/>stream reaches</u></b> | The first sentence of Section 8.5.1.3 makes mention of “reaches will be characterized...,” but nowhere is it explained how the reaches have been broken out or distinguished. The text should provide a better description of how the drainage system was segmented, and what reasoning was employed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 4.                    | Section 8.5.1.3                      | <b><u>Baseline Water Quality – sample<br/>populaton</u></b>                | <p>The document should explain how it was determined that a sample population seven samples would suffice? It seems a minimum sample size of at least 10 would be pursued in order to minimally define the variance within the sample population. It should be better described how the sample locations are determined, and what dictates the proposed number of samples.</p> <p>Describe sample collection in terms of measured field parameters and filtration (totals, dissolved). What is needed is a sample and analysis plan the defines protocols, i.e., the planned volume of the samples collected, will there be any field parameters taken (conductivity, EH, pH, etc.? ) are you going to collect volatiles and semi-volatiles, filtered and unfiltered samples, size of filters, will samples be stored at a specific temperature.</p> |

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| <b>Agency:</b><br>MMD |                                      |                                                                    | <b>Review Date :</b><br>May 8, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Item #</b>         | <b>Section/Page<br/>(or general)</b> | <b>Topic</b>                                                       | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 5.                    | Section 8.5.1.3                      | <b><u>Baseline Water Quality – laboratory detection limits</u></b> | There should be some mention and/or description of the method detection limits that will be employed in the laboratory. The methods are all provided but not the respective detection limits.                                                                                                                                                                                                                                                                                                                                                                                                 |
| 6.                    | Section 8.5.1.4                      | Sediment Constituents                                              | <p>This section needs a discussion on what particle size fraction will be collected for lab analysis.</p> <p>Document needs a discussion as to the sample types; surface point, transect composite, and/or point depth composite.</p> <p>How will samples be collected? What volume of sediment will be collected? How will the sample be prepared (sieving) in the field? Compositing? Split samples for QA/QC?</p> <p>Explain if geomorphic features were considered when selecting sample locations. Describe where sediments will be collected (active channel, bars, overbanks, etc)</p> |
| 7.                    | Section 8.5.1.5                      | Soluble Constituents in Sediments                                  | The text needs to describe any modification to Synthetic Precipitation Leaching Procedure (SPLP) (water/soil ratio, pH adjustments?)                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

**Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 8  
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| <b>Agency:</b><br>Forestry |                              |                                                                   | <b>Review Date:</b><br>May 27, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| Item #                     | Section/Page<br>(or general) | Topic                                                             | Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 1.                         | <u>Page 8-3</u>              | Inter-relationship between potentially impacted springs and flora | <p>The surface water hydrology section in the Roca Honda SAP will investigate these springs, but a botanist and hydrologist also should look at them. And will the ground water that supplies these surface springs be diminished or polluted by the mining operation?</p> <p>My concerns combine a rare plant species with hydrology. Parish's alkali grass occurs on wet, highly alkaline or salty soils around low elevation springs and seeps – not in the adjacent mountains. Do all the springs and seeps along San Mateo Creek have Parish's alkali grass? I know it occurs in the saltgrass cienega around a spring about 2 miles west of San Mateo (Bridge Spring on SAP map page 8-3) and probably on the adjacent North Spring and South Spring along San Mateo Creek.</p> |

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| <b>Reviewer:</b><br>NMED SWQB Comments |                              |       | <b>Review Date:</b><br>May 29, 2009 |
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| <b>Agency:</b><br>NMED                 |                              |       |                                     |
| Item #                                 | Section/Page<br>(or general) | Topic | Comment                             |
|                                        | <b>Section 2</b>             |       |                                     |

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| <b>Reviewer:</b><br>NMED SWQB Comments<br><b>Agency:</b><br>NMED |                                                    |                                                                 | <b>Review Date:</b><br>May 29, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| <b>Item #</b>                                                    | <b>Section/Page<br/>(or general)<br/>Section 2</b> | <b>Topic</b>                                                    | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 1.                                                               | Section 8.1                                        | San Mateo Creek, Rio San Jose, and the Rio Puerco stream types. | Contrary to Section 8.1, San Mateo Creek, the Rio San Jose, and the Rio Puerco may be, at least in reaches, intermittent streams. This is indicated by the presence of woody riparian vegetation that commonly requires water flows beyond mere direct response to storms. Likewise, SWQB disputes that “the drainage and the portions of San Mateo Creek that will be affected directly by discharged water are ephemeral.” This comment is supported by the existence of local springs described in Section 8.1.4. |
| 2.                                                               | Section 8.1                                        | Proposed discharge impact on ephemeral streams                  | Section 8.1 says that “the Roca Honda permit area is drained by ephemeral arroyos....” This text should make clear that the proposed discharge would change at least one of those ephemeral streams to a perennial flow regime.                                                                                                                                                                                                                                                                                      |
| 3.                                                               | Section 8.1.2                                      | Impacts of discharge to ephemeral surface waters                | Regarding Section 8.1.2, the SWQB asserts that at least some of the ephemeral surface waters will become intermittent or perennial during and after the discharge of pumped ground water.                                                                                                                                                                                                                                                                                                                            |
| 4.                                                               | Section 8.5.1.1                                    | mapping of woody riparian vegetation                            | The analysis described in Section 8.5.1.1 should include mapping of woody riparian vegetation, as this can indicate hydrologic conditions such as springs or a non-ephemeral flow regime.                                                                                                                                                                                                                                                                                                                            |
| 5.                                                               | Section 8.5.1.2                                    | Survey and mapping of intermittent reaches                      | According to Section 8.5.1.2, “Once the aerial photographic analysis is completed, a ground survey will be conducted to confirm the location of perennial water bodies and the location and use of structures.” Intermittent reaches should also be ground-surveyed and mapped, rather than lumped with ephemeral reaches.                                                                                                                                                                                           |
| 6.                                                               | Section 8.5.1.2                                    | Determination                                                   | Section 8.5.1.2 says that “The presence or absence of water in the alluvium at the base of the                                                                                                                                                                                                                                                                                                                                                                                                                       |

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| <b>Reviewer:</b><br>NMED SWQB Comments<br><b>Agency:</b><br>NMED |                                                    |                                          | <b>Review Date:</b><br>May 29, 2009                                                                                                                                                                                                                                                                                                                                                 |
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| <b>Item #</b>                                                    | <b>Section/Page<br/>(or general)<br/>Section 2</b> | <b>Topic</b>                             | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                  |                                                    | that arroyo is ephemeral or intermittent | stream bed will be used to determine if the unnamed arroyo and San Mateo Creek are ephemeral or intermittent.” This should not be the only criterion – woody riparian vegetation (i.e., vegetation that is distinct from the uplands) can also indicate flow regimes beyond ephemeral.                                                                                              |
| 7.                                                               | Section 8.5.1.7                                    | Stream bed and channel armoring          | Section 8.5.1.7 describes Stream Bed Armoring. This section should acknowledge that vegetation, particularly in response to perennial flow, could also affect channel morphology.                                                                                                                                                                                                   |
| 8.                                                               | Section 8.5.1.9                                    | Stream rating tables                     | Section 8.5.1.9 describes stream rating tables. The SWQB is concerned that insufficient flow measurements (such as during times of non-wadeable flows) may preclude development of a reliable rating table. The section should address modeling a rating table to fill such data gaps. The SWQB appreciates efforts to relate discharge “break points” with morphological features. |
| 9.                                                               | Section 8.8                                        | Representative Water sampling            | Section 8.8 addresses sampling of flowing water. This section should discuss methods to ensure collection of representative samples, specifically integration through the water column.                                                                                                                                                                                             |
| 10.                                                              | Section 8.9                                        | Baseline channel morphology data         | Section 8.9 should acknowledge that these data will also help establish “baseline” channel morphology.                                                                                                                                                                                                                                                                              |
| References:                                                      |                                                    |                                          |                                                                                                                                                                                                                                                                                                                                                                                     |



Section 9 Ground Water

| <b>Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 9<br/>Rev. April 2009</b> |                                      |              |                                                                                                                                                                                                                          |
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| <b>Agency:</b><br>MMD                                                                                        |                                      |              | <b>Review Date:</b><br>July 10, 2009                                                                                                                                                                                     |
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| 1.                                                                                                           | Section 9<br>Page 5                  | Ground water | MMD advised the drilling of another Dakota well and Gallup well near the production well to monitor leakance from these formations during the Westwater aquifer test.                                                    |
| 2.                                                                                                           | Section 9                            | Groundwater  | General comment:<br>The SAP should indicate that the permit application will provide a discussion on water rights.                                                                                                       |
| 3.                                                                                                           | Section 9                            | Groundwater  | General comment:<br>Need construction diagrams of production and monitor wells.                                                                                                                                          |
| 4.                                                                                                           | Section 9<br>Page 7                  | Groundwater  | Describe the source of drinking water for the community of San Mateo, and explain what monitoring will take place to investigate what effect might the proposed mine dewatering might have on their source of water?     |
| 5.                                                                                                           |                                      |              |                                                                                                                                                                                                                          |
| 6.                                                                                                           | Section 9<br>Page 7                  | Groundwater  | The plan should address obtaining permission from the Lee's to monitor their irrigation well during the aquifer test.                                                                                                    |
| 7.                                                                                                           | Section 9<br>Page 30                 | Groundwater  | Table 9-11 needs to include the Dakota Formation as one of the aquifers to be monitored.                                                                                                                                 |
| 8.                                                                                                           | Section 9<br>Page 33                 | Groundwater  | Table 9-13, needs to identify whether S1, S3, or S4 is to be the Pumping Well so that the related monitoring wells can be appropriately placed. The placement of the other monitoring wells, then need to be identified. |
| 9.                                                                                                           |                                      |              |                                                                                                                                                                                                                          |
| 10.                                                                                                          |                                      |              |                                                                                                                                                                                                                          |

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| <b>Agency:</b><br>OSE |                                             |                                                     | <b>Review Date:</b><br>May 29, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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| 1.                    | Section 9                                   | General                                             | The NM OSE Hydrology Bureau has reviewed the April 2009 Sampling and Analysis Plan (SAP) for the proposed Roca Honda mine, located in Sections 9, 10 and 16 of Township 13 North and Range 8 West in McKinley County. Amongst other permits, the proposal indentifies two required state permits from NM OSE for mine dewatering and appropriation of underground water permits (Section D.11-permits required, page 10 of the SAP Phase 1 Permit application for MK025RN dated 4-20-09). The SAP will, in part, collect information in support of these permit applications. Overall, the surface and ground water sections of the SAP are adequate. An implementation schedule for the SAP may be useful to the State Agencies. Several specific details should be clarified related to the number, duration of aquifer tests within Westwater Canyon member of the Morrison formation. Also, the timing and number of additional wells relative to these aquifer tests needs clarification. A licensed New Mexico driller must drill and install wells in accordance with 19.27.4 NMAC. |
| 2.                    | <u>Section 9.1.3.1, page 9-12</u>           | Alluvium water quality values                       | Note that the text refers to a wide range of water quality for the alluvium while the corresponding Table 9-1 and 9-2 shows one sample. Also, the well's location and number 131 in Table 9-1 does not seem to correspond with any alluvial well in Section 25 of the Plate 1. It may correspond to well 121 in Section 24.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 3.                    | <u>Tables 9-1 and 9-2, page 9-13.</u>       | Metal values                                        | Please check metals values for lead, manganese, aluminum, zinc and copper. These tables appear to have inadvertently left off the less than sign for below the detection limit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 4.                    | <u>Section 9.1.3.7, pages 9-22 to 9-23.</u> | 1950 – 1980 mine water discharges to surface waters | Please clarify in subsequent documents that 1950s-1980s surface discharges of mine water (and residual salts) likely contributed to the poor water quality recharge through the alluvium and into the Morrison formation. As presented, water quality of recharge from the uncontaminated alluvial aquifer would not explain the higher TDS values in the Morrison along San Mateo Creek at the confluence with Arroyo del Puerto.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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| 5.                    | <u>Tables 9-1 and 9-2, page 9-13</u>                    | DOE wells                                                          | Note that there are other US DOE wells that were sampled in this area along with a US NRC Homestake Mill evaluation for an alluvial aquifer study along San Mateo Creek. Uranium and Selenium have been detected in the alluvial aquifer at some locations along San Mateo Creek.                                                                                                                                                                                                                         |
| 6.                    | <u>Section 9.5, page 9-33</u>                           | Well drilling                                                      | The SAP indicates that in geologic formations other than Morrison wells will be installed and developed in accordance to standing operating procedures. No standard operation procedures were provided. NM OSE requires that a licensed driller follow 19.27.4 NMAC Regulations to drill and complete wells. Since artesian conditions exist in the area for some aquifers, an artesian well plan of operation may be a required for submittal, review and approval in accordance with 19.27.4.31.A NMAC. |
| 7.                    | <u>Section 9.5 and Table 9-14, pages 9-33 and 9-34.</u> | Installation of 'shallow wells'                                    | Please clarify whether the shallower wells will be installed prior to the aquifer tests at wells S1, S3 and S4 in the Westwater Canyon member of the Morrison formation. In Section 9.5 it appears that the wells will be installed prior to the aquifer testing. However, Table 9-14 and the Appendix on aquifer testing procedures indicates more uncertainty about the timing of the well installation for the alluvial, Menefee formation, and Point Lookout sandstone.                               |
| 8.                    | <u>Table 9-15, pages 9-35 and 9-36.</u>                 | Incomplete metals list                                             | Table 9-15 repeats itself without including a complete list of metals for analysis.                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 9.                    | <u>Section 9.5 and Table 9-14, pages 9-33 and 9-34.</u> | monitoring of existing or new wells in Gallup and Dakota sandstone | The SAP does not indicate the Gallup Sandstone and Dakota sandstone units would be monitored while pumping the Westwater Canyon member of the Morrison formation and whether wells would be installed in these units. Please clarify whether there will be any monitoring of existing or new wells screened across the Gallup and Dakota sandstones during the aquifer tests.                                                                                                                             |

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| 10.                   | <u>Section 9.5,</u><br><u>page 9-34.</u>                           | quantity of discharge water estimations | The SAP states that the data collected will be used to estimate the quantity of water that will be discharged during dewatering activities. The Roca Honda Project likely will need water quantity evaluations on regional and local scales to assess impacts. Please clarify the methodologies that will be used to make such estimates.               |
| 11.                   | <u>Section 9.5,</u><br><u>Table 9-13 and</u><br><u>Appendix A.</u> | Time span of aquifer test               | Please clarify the specific length of the aquifer tests, which may be 24, 72, or undetermined according to the SAP.                                                                                                                                                                                                                                     |
| 12.                   | <u>Section 9.5,</u><br><u>page 9-33.</u>                           | Well inventory                          | The SAP mentions a well inventory and some field check of wells in comparison to the NM OSE WATERS database. Please include the Water Rights file number, point of diversion (POD) number and well diversion in the tabulated well information.                                                                                                         |
| 13.                   | <u>Table 9-10.</u>                                                 | storativity values                      | Please add Storativity to Table 9-10 or create a separate table with such information. In the event Storativity values are not available for the Westwater Canyon member of the Morrison Formation, one consideration may be that the aquifer test duration should be long enough, if possible, to generate a drawdown response in an observation well. |
| 14.                   | <u>Section 9.1,</u><br><u>page 9-1.</u>                            | Water level data available              | Please note that around 2005 the Rio Algom Mining Company in the Ambrosia Lake area evaluated the USGS model (Kernodle, 1996) using more recent water level data since underground mining and leaching have ceased. The information may be useful in preparing a potentiometric map of the area.                                                        |
| 15.                   | <u>Section 9.9,</u><br><u>page 9-38.</u>                           | Type of GW model?                       | The SAP mentions that a ground water model will be used to assess impacts. Please clarify the type of model(s) and whether the evaluation can address both local and regional scale impacts.                                                                                                                                                            |
| 16.                   | <u>Appendix A.,</u><br><u>Pre-Test</u>                             | Frequency of Background                 | Please clarify the time interval of water level measurements for wells prior to the aquifer tests and during the recovery phase. There is mention of hourly barometric readings without a                                                                                                                                                               |

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|                       | <u>Activities No. 3 &amp; 4.</u>                                                                                                                                                                                                                                                                   | water level measurements            | corresponding frequency for water level measurements. For background transducer measurements a more frequent measurement interval (e.g., every 15 minutes) would better assess the barometric effect on the water levels.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 17.                   | <u>Appendix A, Constant Rate Test - Introduction; Constant Rate Test No. 13; General Test Guidelines No. 5; Pre-Test No. 9; General Test No. 2 &amp; 8; Constant Rate Test No. 9 &amp; last paragraph; Constant Rate Test, Tables A-1 &amp; A-2; Pre-Test No. 5; and Constant Rate Test No. 8.</u> | Aquifer test procedures             | NM OSE concurs and in some instances expands upon for greater emphasis on the following aquifer testing procedures: allow full recovery of water levels to background after the step test and before the constant rate test; continue measurements during recovery phase for possibly weeks until full recovery of water levels is reached; refuel and maintain the generator without shutting down pump during the test; record in the field log all adjustments to valve position and flow rate even when flow checks result in no changes; append field log to data tables; and collect more frequent transducer data for early and late time recording because the data may be useful in identifying regional background trends and indicating equipment malfunctions |
| 18.                   | <u>Appendix A, General Test No. 3; and Pre-Test No. 7.</u>                                                                                                                                                                                                                                         | Flow meter                          | Check manufacturer specifications for totalizing flow meter placement relative to discharge plumbing such as the proximity to elbows, valves, diameter changes and the gate valve for proper function.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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| 19.                   | <u>Appendix A, General Test No. 3; and Constant Rate No. 9.</u> | Orifice meter                           | Check manufacturer specifications for correct use of orifice meter and manometer (or orifice plate and manometer) regarding proximity to plumbing transition and limitation for diameters selected.                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 20.                   | <u>Appendix A, Pre-Test No. 5.</u>                              | Transducers for water level measurement | Check the ratings of the transducers, particularly in the pumped well, to avoid exceeding the tolerance of the device. This would most likely be an issue with setting the transducer near maximum submergence, then having pumping shut off in a transmissive aquifer, where recovery bounce occurs, possibly exceeding original static water level vigorously. It might also occur subtly if there is a regional rise in water level over the duration of data collection, and again the transducers were set at extreme submergence. Transducers provide most accurate data when operated in the middle of their pressure range. |

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| <b>Reviewer:</b><br>NMED GWQB comments |                                      | <b>Review Date:</b><br>May 29, 2009 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| <b>Agency</b><br>NMED                  |                                      |                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| 1.                                     | General                              | Groundwater Permit requirements     | <p>Pursuant to the New Mexico Water Quality Control Commission Regulations (WQCC), Roca Honda Resources has submitted a Ground Water Discharge Permit Application for a proposed mine (DP-1717). The above referenced SAP is included as an attachment to this application and detailed review and comment will be an integral part of the technical review of the Discharge Permit Application. As NMED moves forward with the permitting process detailed comments on the SAP will be provided to the applicant and MMD will be copied on all correspondence related to this effort.</p> <p>Establishment of existing ground water quality within the permit area, and within areas down gradient of the proposed mine site and discharge locations is outlined within the SAP. The New Mexico Mining Act regulations require the collection of baseline data related to ground water. Detailed characterization of ground water relevant to establishment of baseline conditions will be required as part of the discharge permitting process. Pursuant to the WQCC Regulations, the numerical standards as set forth in Section 20.6.2.3103 are applicable unless the applicant makes a statistically valid demonstration that existing water quality exceeds one or more of those standards. Although this is not discussed within the SAP, this will also be addressed through the Discharge Permit process.</p> <p>The SAP mentions collection of additional data not provided within the SAP including, sampling and analysis of existing wells within the general permit area (much of which has been conducted) and installation of additional ground water monitoring wells to collect data from overlying water bearing formations from the target zone. No schedule is provided for installation and sampling of additional monitoring wells, nor</p> |

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| <b>Reviewer:</b><br>NMED GWQB comments |                                      |              | <b>Review Date:</b><br>May 29, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| <b>Agency</b><br>NMED                  |                                      |              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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|                                        |                                      |              | <p>are explicit monitoring well locations proposed. NMED will require a number of additional wells, to both characterize ground water quality within and down gradient of the proposed mine and discharge location(s), as well as for ongoing ground water monitoring during operations. This will also be addressed through the Discharge Permit process.</p> <p>As mentioned above, technical review of the Discharge Permit Application is ongoing, and MMD will be copied on detailed correspondence relative to the SAP and MMD Permit No. MK025RN.</p> |



Section 10 Radiological Survey

| <b>Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 10,<br/>Rev. April 2009</b> |                                      |                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| 1.                                                                                                             | General                              | Radon Survey            | Note - The TLD radon 'survey' needs to be in Section 10 not Section 2.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2.                                                                                                             | General                              | Survey details          | The proposed mining activity may introduce elevated ionizing radiation levels to the proposed mining area. Ionizing radiation levels will be heavily scrutinized during the mining operation and when mining ceases. Therefore, there needs to be a traceable and defensible pre-mining data collection that characterizes pre-mining radiation levels, specifically gamma radiation levels.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3.                                                                                                             | General                              | Data Quality Objectives | <p>There needs to be a clearly stated Data Quality Objective. The objective needs to include the purpose of the survey and the 3 types of surveys needing to be performed.</p> <p>Collecting radiological data is a two-part process in which the intended data will be used in the years following mining commencement. The collected data is meant to ascertain 'background' or 'baseline' radiological levels prior to mining. The background data will be used as baseline values to determine whether there may be elevated gamma, as a result of RHR mining activities. Therefore, the survey should be composed of 3 types of measurements as described in (EPA et. al., 2000, MARSSIM Section 2.2 page 2-3 ) data collection;</p> <p>1) the scanning (of which you have described),<br/>                 2) soil sampling, and<br/>                 3) direct measurement using the NaI scintillation counter.</p> |
| 4.                                                                                                             | Section 10.3                         | Direct                  | <i>As part of the survey RHR needs to include numerous <u>direct radiological sampling</u> (not to</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

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|                       |                                      | <i>Radiological Sampling</i>        | <p><i>be confused with the scanning survey) with the NaI probe. The process for a 'direct measurement' sampling is defined in MARSSIM (EPA et. al., 2000, Section 2.2, page 2-3) as, samples obtained by placing a detector near the media being surveyed and inferring the radioactivity level directly from the detector response.</i></p> <p><i>Furthermore, the guidance for the stationary count time provided by MARSSIM (EPA et. al., 2000, Section 6, Page 10) is as follows,</i></p> <p><i>Direct measurements are taken by placing the instrument at the appropriate distance<sup>2</sup> above the surface, taking a discrete measurement for a pre-determined time interval (e.g., 10 s, 60 s, etc.), and recording the reading. A one minute integrated count technique is a practical field survey procedure for most equipment.</i></p> <p><i>MARSSIM (EPA et. al., 2000, Section 6.4.1.1, Page 11) recommends, at a minimum, a 10-second count for expected low-energy concentrations. The minimum 10-second count is not specified, and without this time-count being specified at discrete locations and elevations, the regression from 'cps' to activity at a specific location is not defensible.</i></p> |
| <b>5.</b>             | Section 10.4.2                       | Survey design                       | The presence of snow, ground moisture, humidity, dust, will affect the NaI scintillation response to gamma-rays. It needs to be specified in your survey design the weather and ground conditions at the time of survey. There needs to be stated what weather conditions will mask a response, thus warranting the survey to be postponed and resumed when more suitable conditions exist.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>6.</b>             | Section 10.4.1 - general             | Probe elevation                     | In order to determine background, or baseline radiation levels of the soil and rock formations, the collecting instrument (in this case the NaI scintillation probe) position should be at ground surface or no more the 6 cm above the ground surfaces (MARSSIM, EPA et. al., 2000, 6.4.2.1., Page 14). The elevation of the probe is not specified in the SAP, please specify the elevation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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|                       |                                      |                     | of the probe relative to the ground surface, and assure that it will be placed within 6-cm of the surface                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>7.</b>             | Section 10                           | Shield on NaI Probe | In order to screen-out (as much as possible) gamma-ray <i>shine</i> the NaI probe needs to be shielded to assure you are obtaining gamma-ray readings at a specific location (minimally influenced by 'shine'). Additionally, the dimensions of the shield need to be stated, as different shield dimensions will screen and block different gamma-ray quantities.<br><br>It is not stated whether the NaI probe is shielded or unshielded and the shield dimensions. The probe needs to be shielded in minimize shine and shield dimensions need to be specified.                                                                                                                                                |
| <b>8.</b>             | Section 10.4.2.1                     | Scan Area           | RHR needs to include baseline more detailed radiological sample measurements (discrete 10-second counts) along the proposed and existing roads (along Highway 605 in Sections 16, 9, and 10). These baseline values are important in order to determine whether there will be U-bearing ore spilled on roadways as it is hauled off the site.                                                                                                                                                                                                                                                                                                                                                                     |
| <b>9.</b>             | Section 10.4.2.1                     | Check source        | Per guidance from NUREG/CR 5879 - Section 5.3 - Instrument Calibration should be traceable to NIST (national institute of standards and technology) standards. -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>10.</b>            | Section 10.4.2.1                     | Calibration         | RHR needs to include calibration process specifics. Such as;<br><br><ol style="list-style-type: none"> <li>1. The instrument should have a 'response records' taken at the DOE calibration pads located on Highway 605 in order to derive the correlation between set counts/minute to a known <sup>226</sup>Ra concentration (at each pad). This allows cross-checks when future surveys are performed with different instruments.</li> <li>2. From MARSSIM (Section 6.5., Page 22) and NUREG (Section NUREG/CR 5849 - Section 5.3) <i>NaI probes should be calibrated against a pressurized ion chamber (PIC)</i>. To assure different probes accurately measure radiation levels at different times</li> </ol> |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                      |              | during mine operations the above guidance needs to be followed.                                                                                                                                                                                                                                                                                                                                                                       |
| 11.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Section 10.4.2.2                     | Procedure    | There needs to be objective evidence that the listed procedures have been developed to comply with the appropriate regulatory and peer reviewed standards and requirements. Provide the procedures and make sure they comply with requirements given regulatory or professional standards and requirements such as EPA QA/R-5 (EPA 1994), ASME NQA-1 (ASME 1989), ISO 9000 (ISO 1987), (IAEA). 1971 or similar regulatory procedures. |
| 12.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                      |              |                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p>References:</p> <p>ASME NQA-1 (ASME 1989) - DOE Order 5700.6c (DOE 1991c)MIL-Q-9858A (DOD 1963) ISO 9000 (ISO 1987)</p> <p>EPA. 1994. <i>EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations</i>. EPA QA/R-5, EPA, Draft Interim Final, Quality Assurance Management Staff, Washington, D.C.</p> <p>EPA et. al., 2000. MARSSIM (EPA 402-R-97-016 REV1, NUREG-1575 REV1, DOE/EH 1624 REV1)</p> <p>EPA 1980. <i>Interim Guidelines and Specifications for Preparing Quality Assurance Project Plans</i>. QAMS-005/80, EPA, Washington, D.C.</p> <p>International Organization for Standardization (ISO). 1987.</p> <p>IAEA. 1971. <i>Handbook on Calibration of Radiation Protection Monitoring Instruments</i>. IAEA, Technical Report Series 133, Vienna.</p> <p>ISO 9000/ASQC Q9000 Series. American Society for Quality Control, Milwaukee, Wisconsin.</p> <p>ISO 9000-1, <i>Quality Management and Quality Assurance Standards - Guidelines for Selection and Use</i>.</p> <p>ISO 9001-1, <i>Quality Systems - Model for Quality Assurance in Design/Development, Production, Installation and Servicing</i>.</p> <p>ISO 9002, <i>Quality Systems - Model for Quality Assurance in Production and Installation, and Servicing</i>.</p> <p>ISO 9003, <i>Quality Systems - Model for Quality Assurance in Final Inspection and Test</i>.</p> |                                      |              |                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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| <b>Agency:</b><br>MMD |                                      |              | <b>Review Date</b><br>July 10, 2009                                                                                                                                                                                                            |
| <b>Item #</b>         | <b>Section/Page<br/>(or general)</b> | <b>Topic</b> | <b>Comment</b>                                                                                                                                                                                                                                 |
|                       |                                      |              | ISO 9004-1, <i>Quality Management and Quality System Elements - Guidelines</i> .<br>NUREG -1507, <i>Minimum Detectable Concentrations with Typical Radiation Survey Instruments for Various Contaminants and Field Conditions</i> . June 1998. |

Section 11 Historical Places and Cultural Properties

| <b>Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 11<br/>Rev. April 2009</b> |                     |                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>Agency:</b><br>Office of Cultural Affairs                                                                  |                     |                                                                                                                                        | <b>Review Date:</b> May 26, 2009                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Item #</b>                                                                                                 | <b>Section/Page</b> | <b>Topic</b>                                                                                                                           | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>1.</b>                                                                                                     | Section 11          | Sites on- or eligible for listing -on either the National Register of Historic Places and/or the State Register of Cultural Properties | According to 19.10.6.602 NMAC, a sampling and analysis plan shall include a list and accompanying map indicating all sites on or eligible for listing on either the National Register of Historic Places and/or the State Register of Cultural Properties and known cemeteries and human burials within the proposed permit area, along with a description of effects the proposed mining operations may have on these sites and any proposed mitigation measures. Although such a list was not provided, to satisfy this requirement, two cultural resource survey reports were submitted: one for the Cibola National Forest Land in Township 13 North, Range 8 West, Sections 9 and 10; and one for the State Trust land in Township 13 North, Range 8 West, Section 16. These surveys were conducted in 2006 although this office just received the reports as part of the sampling and analysis plan. In addition, Section II, Historic Places and Cultural Properties were submitted as part of the sampling and analysis plan. |
| <b>2.</b>                                                                                                     | Section 11          | Disparity between number of recorded arch sites survey and those listed in reported.                                                   | Section 11 does not indicate whether there are cultural properties listed on or eligible for listing on either the National Register of Historic Places and/or the State Registers of Cultural Properties. However, 148 archaeological sites were recorded with the permit area during the cultural resource surveys. Please note that this number was generated from a review of the reports, the section 11 sampling and analysis plan has a slightly different total. The cultural resource survey reports recommend that 74 archaeological sites are eligible for listing to the National Register and 62 sites are of undetermined eligibility for listing. The remainder of the sites is recommended as not eligible for listing.                                                                                                                                                                                                                                                                                               |

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| <b>Agency:</b><br>Office of Cultural Affairs |                     | <b>Review Date:</b> May 26, 2009                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| <b>Item #</b>                                | <b>Section/Page</b> | <b>Topic</b>                                                  | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 3.                                           | Section 11          | Mount Taylor TCP encompasses the a portion of the permit area | In addition to the above archaeological sites, the Mount Taylor Traditional Cultural Property (TCP) encompasses the portion of the permit area that includes the Cibola National Forest land. The Mount Taylor TCP was added to the State Register of Cultural Properties on June 14,2008 on a temporary basis and was determined to be eligible for listing to the National Register of Historic Places on March 14,2008. On June 5, 2009, a decision will be made on whether the Mount Taylor TCP will 'be listed on the State Register on a permanent basis. The portion of the permit area that lies on State Trust land in Township 13 North, Range 8 West, Section 16 is located just outside the boundaries of the TCP.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4.                                           | Section 11          | No discussion of proposed mitigation measures.                | Section 11 also did not include a discussion of the potential effects or any proposed mitigation measures; however, Strathmore's April 13, 2009 letter responding to MMD comments on an earlier draft of the sampling and analysis plan states that the mitigation measures for any archaeological sites either eligible for listing or of undetermined eligibility for listing on either the National Register of Historic Places or State Register of Cultural Properties is avoidance. The Historic Preservation Division (HPD) concurs that avoidance is the best option at this time for activities that will be conducted as part of the sampling and analysis plan. However, it is not clear how Strathmore will ensure that archaeological sites will be avoided. Some of the quality-related work activities in the Field Quality Assurance Plan (FQAP) will include ground disturbance and thus there needs to be a plan in place to ensure avoidance and protection of all of the archaeological sites regardless of whether they are eligible or not. While maps are provided showing the location of each activity proposed under the sampling and analysis plan, to ensure avoidance and protection of sites it would be best to have a single map that shows the locations of archaeological sites in relation to each proposed activity. |
| 5.                                           | Section 11          | Revise Section 11 that will                                   | HPD would like to see a revised Section 11, one that accurately summarizes the number of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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|        |              | accurately summarize # of arch sites and relation to TCP.      | archaeological sites that were recorded during the cultural resources surveys, identifies the presence of the Mt. Taylor TCP, provides a map showing the location of archaeological sites in relation to the proposed activities that will be carried out under the sampling and analysis plan, and provides a plan for avoidance of all archaeological sites. As you know, the map showing the locations of archaeological sites will have to be made confidential, and should only be provided to this office for review. Upon receipt of this revised plan we can review the information and determine if the proposed sampling and analysis plan will have an effect on cultural resources. |
| 6.     | Section 11   | Review needed by Cibola National Forest and State Land office. | Lastly, the Cibola National Forest and the State Land Office must be given the opportunity to review and consult on the sampling and analysis plan. These agencies must also review the cultural resource survey reports and provide their determinations of eligibility for our concurrence. They may or may not agree with the archaeological consultant's determinations. In addition to providing determinations of eligibility for each archaeological site, the Cibola National Forest must consider the effects on cultural resources under their jurisdiction pursuant to Section 106 of the National Historic Preservation Act.                                                        |



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| 1.                    | Section 11.1.1      | Section 9-10                      | “The permit area was previously surveyed as part of a larger survey (Koczan and Doleman 1976)” – This is irrelevant to the SAP; the information goes in the actual reports for Sections 9-10 - delete this sentence (1 <sup>st</sup> paragraph)                                                                                                                                                                                                                                             |
| 2.                    | Section 11.1.1      | Section 9-10                      | “No cemeteries or human burials were found during the survey.” – This is irrelevant to the SAP - delete this sentence (beginning of 2 <sup>nd</sup> paragraph)                                                                                                                                                                                                                                                                                                                              |
| 3.                    | Section 11.1.1      | Section 9-10                      | “The report recommended that the “eligible” and “undetermined” sites be avoided while conducting <i>site</i> activities.” – replace the word “ <i>site</i> ” with “ <u>ground-disturbing</u> ”                                                                                                                                                                                                                                                                                              |
| 4.                    |                     |                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 5.                    | Section 11.1.2      | Sections 16                       | “The field survey conducted on Section 16 identified <u>54 archaeological sites</u> ; 24 sites <u>are</u> recommended for nomination to the National Register of Historic Places.” (make underlined additions)                                                                                                                                                                                                                                                                              |
| 6.                    | Section 11.1.2      | Section 16                        | “If avoidance is not feasible, then testing and <i>full recording</i> of the sites should be performed.” Replace “ <i>full recording</i> ” with “ <u>possibly data recovery</u> ”                                                                                                                                                                                                                                                                                                           |
| 7.                    | Section 11.3        | List of Date to be Collected      | “The entire permit area (1920 acres) will be surveyed for the presence of archaeological and cultural resources <i>of significance</i> ” – Delete <i>of significance</i> ; all sites are recorded; significance is determined later                                                                                                                                                                                                                                                         |
| 8.                    | Section 11.4        | Methods of Collection             | “ <i>The file searches were conducted using the legal descriptions of the project area and a 1.6-km radius surrounds the project area. The search areas included Sections 8, 9, 10, 15, 16, 17, 20, 21, and 22 in T13N, R8W. The results of these literature searches are summarized in the cultural resources survey reports for Sections 9 and 10, and Section 16 (LMASI 2006a and 2006b).</i> ” – Delete this whole paragraph – it’s enough to know that a records review was conducted. |
| 9.                    | Section 11.4        | Methods of Collection             | Following the literature searches, <u>LMASI</u> field personnel conducted a <u>walk-over an archaeological</u> survey of the Roca Honda permit area, evaluating                                                                                                                                                                                                                                                                                                                             |

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|                       |                     |                                   | existing archaeological sites identified from the literature searches and identifying and evaluating new sites not previously recorded. <u>Transects were spaced m apart (we need to know transect spacing. 15 m?)</u> Delete a walk-over                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 10.                   | Section 11.4        | Methods of Collection             | <p><i>“A site can be variable in size and content and range from a cluster of several objects or materials to large areas including structures with associated objects and features. In lieu of State of New Mexico guidelines regarding site definition standards, LMASI used the USFS Region 3 guidelines (NMCRIS No. 101072) to identify cultural sites. Under these guidelines, sites must be greater than fifty years old and have:</i></p> <ol style="list-style-type: none"> <li><i>1. One or more features</i></li> <li><i>2. One formal tool, if associated with other cultural material, or more than one formal tool</i></li> <li><i>3. An occurrence of cultural material that contains:</i><br/><i>Three or more types of artifacts or material</i><br/><i>Two types of artifacts in a density of at least 10 items per 100 square miles</i></li> </ol> <p><i>Sampling and Analysis Plan Section 11.0- Historic Places and Cultural Properties Roca Honda Mine April 2009 Page 11-3</i></p> <p><i>A single type of artifact in a density of at least 25 items per 100 square miles</i></p> <p><i>Isolated occurrences, on the other hand, are cultural remains that do not qualify as sites and generally consist of single artifacts or artifact scatters that are of extremely low density and are widely dispersed, or represent a single activity. Redeposited material that lacks significant locational context may also be determined to be an isolated occurrence.” – Delete all of this – not necessary in text</i></p> |
| 11.                   | Section 11.4        | Methods of                        | Last paragraph: “Sites were plotted on USGS quadrangle maps,” – <u>was this</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|                       |                     | Collection                           | <u>really done in the field? Usually GPS data is downloaded and plotted on a map back in the office</u>                                                                                                                                                                                                                                                                                                   |
| 12.                   | Section 11.4        | Methods of Collection                | In the text, “When isolated occurrences were encountered, they were recorded in the field and <i>then</i> <u>their locations</u> plotted on the USGS quadrangle map”. Delete <i>then</i>                                                                                                                                                                                                                  |
| 13.                   | Section 11.5        | Parameters                           | Add at beginning: <u>all of Sections 10, 11, and 16 were surveyed.</u>                                                                                                                                                                                                                                                                                                                                    |
| 14.                   | Section 11.5        | Parameters                           | “The field surveys <i>identified</i> <u>documented</u> 94 new archaeological sites and 160 isolated occurrences in Sections 9, 10, and <u>50</u> <u>54</u> new archaeological site and 72 isolated occurrences in Section 16.” Delete italicized and add underlined.                                                                                                                                      |
| 15.                   | Section 11.6        | Maps....                             | A map needs to be provided showing the mining footprint overlaid on a map of the archaeological sites. The map must include the “LA #” for each site.                                                                                                                                                                                                                                                     |
| 16.                   | Section 11.7        | Sampling Frequency                   | “ <i>Cultural resources are located and identified during walkover surveys in the field. These surveys have been completed for purposes of a pre-mining assessment.</i> ” Delete, and replace with <u>One hundred percent of the project area was surveyed.</u>                                                                                                                                           |
| 17.                   | Section 11.8        | Lab and Field QA                     | “ <i>The Contractor retained to perform the work is certified by the State of New Mexico to perform the historic and cultural surveys. These experienced professionals followed the accepted field procedures to conduct the surveys, mark and map the findings, and report the results.</i> ” Delete, and replace with <u>The archaeologists are permitted by the State of NM and the USFS (Cibola).</u> |
| 18.                   | Section 11.9        | Brief Discussion Supporting Proposal | “The objective of the cultural resources surveys are to locate all <u>archaeological</u> sites <i>on or eligible for listing on either the NRHP and /or the State Register of Cultural Properties and known cemeteries and human burials</i> within the proposed permit area” insert archaeological                                                                                                       |

Section 12

| <b>Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 12</b><br><b>Rev. April 2009</b> |              |                                   |                                                                                                                                                                                                                                                                              |
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| <b>Agency:</b><br><b>MMD</b>                                                                                        |              | <b>Review Date: July 10, 2009</b> |                                                                                                                                                                                                                                                                              |
|                                                                                                                     | Section/Page | Topic                             | Comment                                                                                                                                                                                                                                                                      |
| 1.                                                                                                                  | General      | Exploratory boreholes             | An account of when exploration boreholes were drilled needs to be discussed in this section. This needs to include specifics, including, if possible the company that drilled these holes, not a general statement that boreholes were drilled between a certain time-frame. |

Section 13 Prior Mining Operations

| <b>Review of Strathmore SAP Document for the Roca Honda Uranium Mine Site, Section 13</b><br><b>Rev. April 2009</b> |                           |                         |                                                                            |
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| <b>Agency:</b><br><b>MMD</b>                                                                                        |                           |                         | <b>Review Date</b>                                                         |
| Item #                                                                                                              | Section/Page (or general) | Topic                   | Comment                                                                    |
| 1.                                                                                                                  | Figure 13-1               | Contour elevations      | Please put elevations on the contour lines.                                |
| 2.                                                                                                                  | Figure 13-1               | Observation well labels | Please label observation wells on the map and their respective elevations. |

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| <b>Agency:<br/>MMD</b> |                                      |                       | <b>Review Date</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| <b>Item #</b>          | <b>Section/Page<br/>(or general)</b> | <b>Topic</b>          | <b>Comment</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 3.                     | Section 13.1                         | Exploratory boreholes | There needs to be a survey planned that;<br>1) identifies all exploratory boreholes and provides their UTM NAD-83 GPS/GIS coordinates (these should be included in shape files provided in the report) in the proposed mining sections,<br>2) depth of these boreholes,<br>3) diameter of the exploratory boreholes, and<br>4) type of plugging.                                                                                                                                                                                                                                                                                                   |
| 4.                     | Section 13.2                         | Mt. Taylor dewatering | It is acknowledged that Mt. Taylor mine has been in operation from the mid-1970s to early 1980s. The mine had extensive dewatering and discharge to San Mateo creek. As a surrogate to proposed RHR mining activities, the SAP should discuss the process by which RHR will acquire and analyze data related to dewatering activities and aquifer recovery at the Mt. Taylor Mine. The SAP should also discuss the process by which RHR will acquire and analyze data that would provide information related to the impacts of Mt. Taylor discharge water to surface stream water quality, and precipitates in the alluvium.                       |
| 5.                     | Section 13.2                         | Lee Ranch Mine shaft  | The SAP should indicate that details of the Lee Ranch mine shaft which is located approximately 0.5 miles west of Section 16 will be addressed in the permit application. The following questions need to be addressed; 1) How deep is the shaft? 2) Is it open? 3) How is the shaft currently being used? 4) Does the shaft serve as a ground water sink? 5) Has the shaft construction affected water in the Dakota, Gallup, or Westwater Sandstones within the vicinity of the proposed mine operations (Sections 9, 10, and 16)? 6) Is the shaft currently being used as a water well? 7) Is there going to be monitoring of this 'shaft/well' |