Department of Energy



Washington, DC 20585 January 16, 2025

Via email: Corey_Dias@hotmail.com

Mr. Corey Dias Highbury Resources Inc. 10878 South 1300 East, Suite 120 Sandy, UT 84094

Subject: Highbury Resources Inc.

Uranium Leasing Program Mining Leases: DE–RO01–19LM70254, DE–RO01–19LM70255, DE–RO01–19LM70256, DE–RO01–19LM70257, DE–RO01–19LM70244, DE–RO01–19LM70238

Dear Mr. Dias:

The U.S. Department of Energy (DOE) Office of Legacy Management (LM) is issuing this letter as a follow-up to our letter on August 29, 2024, outlining a proposed conclusion to updating Highbury's performance bonds for the reclamation of their remaining permitted sites. The August letter followed the July 24, 2024, meeting where Highbury, Highbury's contractor BRS Engineering, Inc. and LM discussed the reclamation bond and the need to adjust the bond. Based on discussions during the July meeting, LM elected to simply adjust the reclamation estimates agreed upon in 2014 for inflation based off two cost indexes BRS proposed. In the August letter, LM requested that Highbury provide proof of bonding by January 8, 2025, four months after the August letter. Since then, LM has not received any further communication from Highbury regarding the proposed bonding adjustments.

In the August letter, LM proposed the following reclamation bond schedule:

- 1. The current total bond (\$1,928,243) held by DOE will be increased by 45.2% to \$2,799,900.
- LM would not consider a revision to the bonds for the leases to Lease Tracts C-JD-6, C-JD-8, C-JD-9, C-SM-18, and C-SR-11, except for the 45.2% outlined above, until at least January 2026. This would be predicated upon Highbury advancing and completing the reclamation work outlined in the Environmental Protection Plans for those lease tracts to DOE's satisfaction.
- 3. Highbury would provide DOE and Colorado Division of Reclamation, Mining and Safety an updated reclamation plan for Lease Tract C-JD-7 by January 8, 2025. From this updated plan, a scope and bond amount will be determined for Lease Tract C-JD-7.

LM still stands by this schedule with the understanding that bullet 3 is predicated upon Highbury completing its lessee Environmental Checklist which is currently with LM for review.

On August 21, 2024, Highbury also received an extension from the Colorado Mined Land Reclamation Board pushing the deadline to complete final reclamation to March 1, 2030. LM understands that since the Board's decision, Anfield has been engaged with other pursuits along with structural changes to its business; however, updating the bond to ensure reclamation is critical.

Currently, Highbury is out of compliance with its Leases until this gets resolved. To ensure that reclamation is completed, LM must have proof of updated bonding no later than March 10, 2025. If this timeframe is not met, LM will consider evaluating options to accomplish final reclamation if necessary or required.

LM will also continue to work with Highbury on their required Checklists and other required approvals to support the reclamation effort. Please contact me at (970) 640-6088 or at Ian.Shafer@lm.doe.gov if you have any questions.

Sincerely, IAN SHAFER

Digitally signed by IAN SHAFER Date: 2025.01.16 15:17:19 -07'00'

Ian Shafer Uranium Leasing Program Manager

cc via email: Josh Bleak, Highbury Doug Beahm, BRS Engineering Harold Hutson, BRS Engineering Stephanie Carter, BLM Dustin Czapla, DRMS Travis Marshall, DRMS Russ Means, DRMS Lucas West, DRMS William Burns, DOE-LM Candice Long, DOE-LM Polly Robinson, DOE-LM April Ayers, RSI Joel Doebele, RSI Brian Mangan, RSI Nolan McDonald, RSI Treyton Nusbaum-Davis, RSI Jason Ritter, RSI Ann K. Wei, RSI FOLD/20/332