Energy Fuels Resources (USA) Inc.
225 Union Blvd. Suite 600
Lakewood, CO, US, 80228
303 974 2140
www.energyfuels.com

February 18, 2025

Amy Yeldell
DRMS Room 215,
1001 E 62nd Ave,
Denver, CO 80216

Re: Whirlwind Mine, Permit No. M-2007-044, Response to Technical Revision (TR-2), Adequacy Review-2

Dear Ms. Yeldell:

Energy Fuels Resources (USA) Inc. ("**EFRI**") is in receipt of the Division of Reclamation, Mining and Safety ("**DRMS**") Adequacy Review-2 dated February 6, 2025. EFRI requested and received approval for an extension of time from DRMS to respond by February 24, 2025. EFRI's responses to the DRMS request for additional information are as follows.

Exhibit E - Reclamation Plan

1. Pages E-7 and E-8. With regards to burying on place the three HDPE pipelines is any sort of capping measures required?

***EFRI Response*:** According to the BLM, no capping will be required. The pipeline would be placed at the very bottom of the decline.

a. Provide documentation from BLM that you have approval for the pipelines to be buried in place for final reclamation.

***EFRI Response*:** The documentation approving burial of the pipelines is in the BLM-approved Plan of Operations, Exhibit 6, Section 6, pg 6-9. A copy of that page is attached. HDPE is considered an inert material and burying HDPE pipe is an accepted method of reclamation for the BLM.

Exhibit L - Reclamation Costs

2. What are the anticipated job hours associated with the following user provided items?
   a. BH1 Whirlwind decline bulkhead
   b. 01W Water treatment sludge disposal -paste backfill
   c. 01W Water treatment liner disposal
   d. 01W Disposal of ion exchanger units

***EFRI Response*:** The quotes provided by third parties include job supervisor/superintendent hours for a. through d. above.

3. Please clarify if the quote from WRT for $10,000 was per ion exchanger, so $20,000 for both on site, OR for the system and a total of $10,000 for disposal of the system.

***EFRI Response*:** The quote from WRT for $10,000 is for the system (i.e., IX unit removal and proper disposal of resin beads).

If you have any questions please contact me at (307)351-9165 or dkolkman@energyfuels.com, or Scott Bakken at sbakken@energyfuels.com.

Sincerely,

Dawn Kolkman Digitally signed by Dawn Kolkman Date: 2025.02.18 17:16:56 -07'00'

ENERGY FUELS RESOURCES (USA) INC.
Dawn Kolkman
Permitting Manager, Regulatory Affairs

Encl. BLM Plan of Operations, Page 6-9

cc: M. Munson (DOGM), J. Whittington (BLM),
S.Bakken, T. Groves, N. Martin (EFRI)

- Water Treatment Tanks (3 tanks that must be disassembled and hauled off site) Removal cost: $1,200
- Shop and office building, 60 feet x 43 feet size, One story (fixed building which must be dismantled) Removal cost: $6,000
- Dry change facility, 50’ x 20’, One story (fixed building which must be dismantled) Removal cost: $2,500
- Storage Trailer (portable) 12 feet x 40 feet
- Generator Trailer (portable) 12 feet x 40 feet, assumes that it is still on site even though power is expected to be delivered to the mine at an early stage.
- A skid-mounted oil storage shed with nominal dimensions of eight feet by ten feet located adjacent to the maintenance shop (portable).
- Helipad (20 feet x 20 feet) Removal cost: $1,000
- Four 500-gallon diesel fuel tanks on the Whirlwind Pad area as shown on Map C-2, called the fuel station, immediately west of the ore pad. These tanks will be installed within larger livestock tanks (approx. 700-gallons each). Removal cost: $2,200
- Magnesium Chloride Tank located near the portal. The tank size is 1,000 gallons and it will be contained within a soil berm. Removal cost: $500
- Propane tank (portable), 500 gallons.
- Fence around water treatment area and mine entrance. Removal cost: $1,500
- Concrete sump (6 feet x 6 feet) which drains from the ore pad area to a pipe (the HDPE pipe will remain buried in the backfill) Removal cost: $1,000
- 2 powder magazines: Removal cost $1,000.
- Watchman’s trailer: (portable)

Subtotal of removal costs: $16,900.

The following structures will be removed at the Packrat Portal area:

- Retaining wall, approximately 300 feet in length, with an average height of 8 feet and a maximum height of 22 feet. This wall will be made of steel supports with wood beams. Removal cost: $10,000.