



March 28, 2013

Dustin Czapla  
Colorado Division of Reclamation, Mining and Safety  
Grand Junction Field Office  
101 S. Third St, Room 301  
Grand Junction, Colorado 81501

**RECEIVED**  
APR 01 2013  
GRAND JUNCTION FIELD OFFICE  
DIVISION OF  
RECLAMATION MINING & SAFETY

RE: LP-21 Response to Adequacy Review 2

Mr. Czapla:

Attached are two copies of Cotter Corporation's (N.S.L.) Response to Adequacy Review 2 for the LP-21 Mine Permit # M-1977-305.

If you have any questions or concerns regarding the information submitted please call me at the number shown below.

Respectfully,

Glen Williams  
Vice President, Mining Operations

LP-21 resp to adeq rvw 2 ltr

**LP-21 MINE PERMIT AMENDMENT**  
**APPLICATION PERMIT No. M-1977-305**  
**Response to Adequacy Review #2**

***March 2013***

**Prepared by Cotter Corporation (N.S.L.)**

**AND**

**O'Connor Design Group, Inc.**



2350 G Road ~ Grand Junction, CO 81505 ~ (970) 241-7125

Cotter Corporation (N.S.L.) (“Cotter”) submits this response to the February 6, 2013, letter from Dustin Czapla, Division of Reclamation, Mining and Safety (“DRMS”), to Glen Williams, Cotter. The DRMS’s comments are in italics and Cotter’s responses are in bold.

- 1. A request to release 0.87 acres from the permitted area was incorporated with this application. A request to release acreage must be processed separate from this AMI application and in accordance with Rule 4.17. Additionally, the introduction to the AMI application states that 0.87 acres are requested for release from the permitted area. The first table in Exhibit A shows that 2.32 acres are to be removed from the permitted area (rows 8-11). The second table in Exhibit A shows that 1.71 acres are to be removed from the permitted area. The table in Exhibit D also shows that 2.32 acres are to be removed from the permitted area (rows 8-11). Please correct these inconsistencies prior to submission of the above noted release request.*

**The inconsistent acreages found in the application, the introduction, and the tables in Exhibit A and Exhibit D have been corrected. The original 0.87 acres associated with vent hole #1 and the 0.32 acres associated with vent hole #6 have been added back into the permitted acreages.**

**A revised pages 1, 5, 7, and 8 of the application, the introduction, Exhibit A, and page D-4 of Exhibit D are included as Attachment 1.**

**The second table in Exhibit A lists the vent hole and roads that were found to be inaccurately located in the original mining plan. Cotter is requesting that DRMS recognize that neither a vent hole nor any roads were ever constructed in these quarter-quarter sections. All the acreages associated with these roads and this vent hole have been accurately located and are included in the revised permit area.**

- 2. Exhibits D and U (pp. D-5 and U-4) of the AMI application and the Response to Adequacy Review #1 state that the high clay content of the soils underlying the proposed ore pad will contribute to limiting downward mobility of any potentially leachable constituents from the ore. Neither Exhibit D or Exhibit U include design details for the ore pad, nor a description of the properties of the clay soil underlying the ore pad, such*

*as clay type, thickness, cation exchange capacity, compaction, hydraulic conductivity, optimum moisture content, etc. Please submit design details for the proposed ore pad. The attached General Ore Pad Construction Criteria may be a useful resource for preparing the ore pad design.*

**SPLP tests were conducted on the waste rock at the LP-21 mine. Based on these tests, the LP-21 mine does not create a risk for acidic drainage.**

**Geochemical conditions of high alkalinity, montmorillonitic clay soils that exhibit high cation exchange capacities and an arid environment where infiltration of precipitation is limited to the upper few centimeters of soil all provide a sound technical position that downward mobility of any potentially leachable constituents will be limited and should not be a concern.**

**In order to address the DRMS concern of “potentially leachable constituents,” regardless of the limited potential environmental impacts as described above, Cotter will install a 40-mil synthetic liner under the ore pad area and cover the liner with 12 inches of soil to protect its integrity. Local soils that have high clay content will be preferentially selected to provide an additional level of protection. This liner and cover will provide a conservative measure of protection. A cross section of the ore pad is included as Attachment 2.**

3. *Exhibit E (pg. E-4) of the AMI application contains little detail regarding reclamation of the ore pad. The reclamation plan proposes to cap the ore pad with adjacent waste rock and to revegetate. The Division believes there is potential for uranium and related constituents to be leached from the ore stockpile. Therefore there is potential that the underlying clay material will contain elevated levels of radionuclide following mining. Please submit a plan for reclaiming the ore pad that will ensure that radionuclide levels will not exceed the baseline conditions submitted with the AMI application package.*

**The potential for migration of uranium-related constituents is minor, because of the limited storage time of the ore stockpile, limited recharge in**

the arid region, geochemical conditions restricting transport, and low permeability of the surrounding geologic formations. Cotter has proposed ore-handling procedures to DRMS that limit exposure of ore by using a first in/first out method. These procedures will minimize the time available for precipitation to penetrate the ore and leach potential constituents of concern. As discussed in the EPP, low precipitation and high evapotranspiration rates limit recharge to the upper soil surface. Since natural soils experience limited penetration of precipitation, this clay would restrict and sorb any material within the upper few inches. The montmorillonitic clay soils of the area have some of the highest cation exchange capacities observed for natural soils. Numerical modeling has shown that the transport of uranium-related constituents from surface sources is highly restricted, because of the lack of recharge, low permeability of the geologic formations and high sorption values.

During reclamation, the ore pad will be removed to a depth of 12 inches and placed in the mine approximately 100 feet down from the portal. The area will then be covered by available soil, pocked, and seeded.

4. *The AMI EPP states that there is a lack of well information, and that it is difficult to identify the upper-most aquifer (pg. U-14). Rule 6.4.21 (8) requires that the upper most aquifer underlying the proposed operation be identified. Please identify the upper-most aquifer per the requirements of Rule 6.4.21 (8).*

The best available information for the remote area where the LP-21 mine is located indicates that the Wingate Sandstone is the formation with the highest potential for containing the uppermost aquifer in the area.

Without direct information from existing or historic wells in the area, other sources of information, such as stratigraphic location, geologic structure, and availability of recharge, must be used to define the uppermost aquifer. On the basis of hydrologic information from across the Colorado Plateau, the

**Wingate Formation is the most consistent water-producing formation. The Pennsylvanian Formations, in particular the Hermosa Formation, are known to contain groundwater in the Colorado Plateau region, and these formations are in contact with the Dolores River in the Paradox Valley, which provides a reliable source of recharge. These formations are generally over a thousand feet *below* the Wingate Formation and are separated by low-permeability formations such as the Chinle and Moenkopi shales and mudstones. While there is some degree of uncertainty, Cotter's approach is conservative in assuming that the Wingate formation contains the uppermost aquifer and all potential environmental impacts are based on this conservative assumption.**

5. *The EPP states that the limited time the ore will be on the ore pad will contribute to limiting the adverse effects of the ore to groundwater (pg. U-4). Please inform the Division of the maximum amount of time that ore will be stored on the pad. Also, please inform the Division of the detailed methods the operator will take to ensure that ore is stored on the pad no longer than proposed.*

**Cotter's mining procedures use a first in/first out method of transporting ore from the stockpile. The site foreman is responsible for enforcing this procedure and ensuring that the ore is not left on the pad for more than 180 days.**

## **ATTACHMENT 1**

# STATE OF COLORADO

## DIVISION OF RECLAMATION, MINING AND SAFETY

Department of Natural Resources

1313 Sherman St., Room 215

Denver, Colorado 80203

Phone: (303) 866-3567

FAX: (303) 832-8106



### REGULAR (112d) DESIGNATED MINING OPERATION

#### RECLAMATION PERMIT

#### APPLICATION FORM

CHECK ONE: ☐ New Application (Rule 1.4.5) ☒ Amendment Application (Rule 1.10)  
☐ Conversion Application (Rule 1.11)

Permit No. M- 1977 - 305 (provide for amendments and conversions of existing permits)

The application for a Regular (112d) Designated Mining Operation Reclamation Permit contains three major parts: (1) the application form; (2) Exhibits A-T, Geotechnical Stability Exhibit, the Emergency Response Plan, and Addendum I, as required by the Office, and outlined in Rules 6.1, 6.2, 6.3, 6.4.19, 6.5, 8.0, and 1.6.2(1)(b); and, (3) the application fee. When you submit your application, be sure to include one (1) signed and notarized original and four (4) copies of the application form, five (5) copies of Exhibits A-T, Rule 6.5 Geotechnical Stability Exhibit, the Emergency Response Plan, Addendum I, and a check for the appropriate application fee (described under Section (4) on Page 2). Exhibits should not be bound or in a 3-ring binders; maps should be folded to 8 1/2" X 11" or 8 1/2" X 14" size. To expedite processing, please provide the information in the format and order described in this form.

#### GENERAL OPERATION INFORMATION

Type or print clearly, in the space provided, all information described below.

1. Applicant/operator or company name (name to be used on permit):

Cotter Corporation N.S.L.

1.1 Type of organization (corporation, partnership, etc.): Corporation

1.2 I.R.S. Tax ID No. or Social Security Number: 85-0125530

2. Operation name (pit, mine or site name): LP-21

3. Permitted acreage: (new or existing site)

13.2 permitted acres

3.1 Change in acreage (+) 5.12 acres

3.2 Total acreage in Permit area 18.32 acres



4. Fees:

4.1	<u>New</u> 112d(1) Application (affecting less than 50 acres and extracting less than 1 million tons per year) application fee	<u>\$4,025.00</u>
4.2	<u>New</u> 112d(2) Application (larger than above but affecting less than 100 acres and extract less than 5 million tons per year)	<u>\$6,900.00</u> application fee
4.3	<u>New</u> 112d(3) Application (any other operation)	<u>\$9,200.00</u> application fee
4.4	<u>Existing</u> 112d(1) Amendment Fee	<u>\$2,300.00</u> amendment fee
4.5	<u>Existing</u> 112d(2) Amendment Fee	<u>\$4,025.00</u> amendment fee
4.6	<u>Existing</u> 112d(3) Amendment Fee	<u>\$7,475.00</u> amendment fee
4.7	<u>New</u> 112d(1) Amendment Fee	<u>\$2,875.00</u> amendment fee
4.8	<u>New</u> 112d(2) Amendment Fee	<u>\$4,600.00</u> amendment fee
4.9	<u>New</u> 112d(3) Amendment Fee	<u>\$8,050.00</u> amendment fee
4.10	Conversion Fee	see above application fees

5. Primary commodity(ies) to be mined: Uranium Vanadium

6. Name of owner of surface of affected land: The Bureau of Land Management

7. Name of owner of subsurface rights of affected land: The U.S. Department of Energy  
If 2 or more owners, refer to Exhibit O.

8. Type of mining operation: ☐ Surface ☒ Underground

9. Location Information: the center of the area where the majority of mining will occur lies in:

COUNTY: Montrose

PRINCIPAL MERIDIAN (check one): ☐ 6th (Colorado) ☒ 10th (New Mexico) ☐ Ute

SECTION (write number): S 27

TOWNSHIP (write number and check direction): T 47 ☒ North ☐ South

RANGE (write number and check direction): R 17 ☐ East ☒ West

QUARTER SECTION (check one): ☐ NE ☒ NW ☐ SE ☐ SW

QUARTER/QUARTER SECTION (check one): ☐ NE ☐ NW ☐ SE ☒ SW

GENERAL DESCRIPTION (miles and direction from nearest town and approximate elevation):

The LP-21 Mine is located approximately 5 miles south of the abandoned town of Uravan at 6500 feet.

10. Primary Mine Entrance Location (report in either Latitude/Longitude OR UTM):

Latitude/Longitude:  
Example: (N) 39° 44' 12.98"  
(W) 104° 59' 3.87"

Latitude (N): deg 38 min 17 sec 55 33 (2 decimal places)  
Longitude (W): deg 108 min 44 sec 14 48 (2 decimal places)

OR

Example: (N) 39.73691°  
(W) -104.98449°

Latitude (N) \_\_\_\_\_ (5 decimal places)

Longitude (W) \_\_\_\_\_ (5 decimal places)

OR

Universal Transverse Mercator (UTM)

Example: 201336.3 E NAD27 Zone 13  
4398351.2 N

UTM Datum (specify NAD27, NAD83 or WGS 84) Nad 83 Zone 13

Easting \_\_\_\_\_

Northing \_\_\_\_\_

11. Primary future (Post-mining) land use (check one):

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Cropland(CR)                  | <input type="checkbox"/> Pastureland(PL)          | <input type="checkbox"/> General Agriculture(GA)         |
| <input type="checkbox"/> Rangeland(RL)                 | <input type="checkbox"/> Forestry(FR)             | <input checked="" type="checkbox"/> Wildlife Habitat(WL) |
| <input type="checkbox"/> Residential(RS)               | <input type="checkbox"/> Recreation(RC)           | <input type="checkbox"/> Industrial/Commercial(IC)       |
| <input type="checkbox"/> Developed Water Resources(WR) | <input type="checkbox"/> Solid Waste Disposal(WD) |  |

12. Primary present land use (check one):

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Cropland(CR)                  | <input type="checkbox"/> Pastureland(PL) | <input type="checkbox"/> General Agriculture(GA)         |
| <input type="checkbox"/> Rangeland(RL)                 | <input type="checkbox"/> Forestry(FR)    | <input checked="" type="checkbox"/> Wildlife Habitat(WL) |
| <input type="checkbox"/> Residential(RS)               | <input type="checkbox"/> Recreation(RC)  | <input type="checkbox"/> Industrial/Commercial(IC)       |
| <input type="checkbox"/> Developed Water Resources(WR) |  |  |

13. Method of Mining: ☐ Quarry (QR) ☐ Solution (SO)

13.1 Other: Briefly explain mining method (e.g. Placer, truck/shovel): \_\_\_\_\_

Ore will be mined using a modified room and pillar system, i.e. split shooting is used in conjunction with leaving waste pillars and ore pillars wherever necessary for roof support.

14. Correspondence Information:

APPLICANT/OPERATOR (name, address, and phone of name to be used on permit):

Contact's Name: Glen Williams Title: Manager  
Company Name: Cotter Corporation  
Street: 28151 Dd Road P.O. Box: 700  
City: Nucla  
State: Colorado Zip Code: 81424  
Telephone Number: ( 970 ) - 864-7347  
Fax Number: ( ) -

PERMITTING CONTACT (if different from applicant/operator above):

Contact's Name: \_\_\_\_\_ Title: \_\_\_\_\_  
Company Name: \_\_\_\_\_  
Street: \_\_\_\_\_ P.O. Box: \_\_\_\_\_  
City: \_\_\_\_\_  
State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Telephone Number: ( ) -   
Fax Number: ( ) -

INSPECTION CONTACT:

Contact's Name: Glen Williams Title: Manager  
Company Name: Cotter Corporation  
Street: 28151 Dd Road P.O. Box: 700  
City: Nucla  
State: Colorado Zip Code: 81424  
Telephone Number: ( 970 ) - 864-7347  
Fax Number: ( ) -

CC: STATE OR FEDERAL LANDOWNER (if any):

Agency: U.S. Department of Energy  
Street: 11025 Dover Street, Suit 1000  
City: Westminister  
State: Colorado Zip Code: 80021  
Telephone Number: ( 720 ) - 377-9683

CC: STATE OR FEDERAL LANDOWNER (if any):

Agency: \_\_\_\_\_  
Street: \_\_\_\_\_  
City: \_\_\_\_\_  
State: \_\_\_\_\_ Zip Code: \_\_\_\_\_  
Telephone Number: ( ) -

15. On Site Processing:

☐ Solution (SO)    ☐ Chemical (CH)    ☐ Thermal (TH)  
☐ Heap Leach (HL)    ☐ Vat Leach (VL)

List any designated chemicals or acid-producing materials to be used or stored within permit area: \_\_\_\_\_

NONE

Description of Amendment:

If you are amending or converting an existing operation, provide a brief narrative describing the proposed change(s):

Cotter is amending the original 112 permit to include an Environmental Protection Plan. Cotter is  
requesting an increase in acreages for proposed and existing ventholes, roads and the surface  
facility and waste dump in order to include drainage structures.

Maps and Exhibits:

Five (5) complete, unbound application packages must be submitted. One complete application package consists of a signed application form and the set of maps and exhibits referenced below as Exhibits A-T, the Geotechnical Stability Exhibit, the Emergency Response Plan, and Addendum I. Each exhibit within the application must be presented as a separate section. Begin each exhibit on a new page. Pages should be numbered consecutively for ease of reference. If separate documents are used as appendices, please reference these by name in the exhibit.

With each of the five (5) signed application forms, you must submit a corresponding set of the maps and exhibits as described in the following references to Rules 6.4, 6.5, 8, and 1.6.2(1)(b):

EXHIBIT A -	Legal Description
EXHIBIT B -	Index Map
EXHIBIT C -	Pre-Mining and Mining Plan Map(s) of Affected Lands
EXHIBIT D -	Mining Plan
EXHIBIT E -	Reclamation Plan
EXHIBIT F -	Reclamation Plan Map
EXHIBIT G -	Water Information
EXHIBIT H -	Wildlife Information
EXHIBIT I -	Soils Information
EXHIBIT J -	Vegetation Information
EXHIBIT K -	Climate Information
EXHIBIT L -	Reclamation Costs
EXHIBIT M -	Other Permits and Licenses
EXHIBIT N -	Source of Legal Right-To-Enter
EXHIBIT O -	Owners of Record of Affected Land (Surface Area) and Owners of Substance to be Mined
EXHIBIT P -	Municipalities Within Two Miles
EXHIBIT Q -	Proof of Mailing of Notices to County Commissioners and Conservation District
EXHIBIT R -	Proof of Filing with County Clerk and Recorder
EXHIBIT S -	Permanent Man-Made Structures
EXHIBIT T -	Designated Mining Operation Environmental Protection Plan
RULE 6.5 -	Geotechnical Stability Exhibit
RULE 8 -	Emergency Response Plan
ADDENDUM I -	Notice Requirements (sample enclosed) (Rule 1.6.2(1)(b))

The instructions for preparing Exhibits A-T, the Geotechnical Stability Exhibit, the Emergency Response Plan, and Addendum I, are specified under Rule 6.4, 6.5, 8, and 1.6.2(1)(b) of the Mineral Rules and Regulations. If you have any questions on preparing the Exhibits or content of the information required, or would like to schedule a pre-application meeting you may contact the Office at 303-866-3567.

Responsibilities as a Permittee:

Upon application approval and permit issuance, this application becomes a legally binding document. Therefore, there are a number of important requirements which you, as a permittee, should fully understand. These requirements are listed below. Please read and initial each requirement, in the space provided, to acknowledge that you understand your obligations. If you do not understand these obligations then please contact this Office for a full explanation.

- X 1. Your obligation to reclaim the site is not limited to the amount of the financial warranty. You assume legal liability for all reasonable expenses which the Board or the Office may incur to reclaim the affected lands associated with your mining operation in the event your permit is revoked and financial warranty is forfeited;
- X 2. The Board may suspend or revoke this permit, or assess a civil penalty, upon a finding that the permittee violated the terms or conditions of this permit, the Act, the Mineral Rules and Regulations, or that information contained in the application or your permit misrepresent important material facts;
- X 3. If your mining and reclamation operations affect areas beyond the boundaries of an approved permit boundary, substantial civil penalties, to you as permittee can result;
- X 4. Any modification to the approved mining and reclamation plan from those described in your approved application requires you to submit a permit modification and obtain approval from the Board or Office;
- X 5. It is your responsibility to notify the Office of any changes in your address or phone number;
- X 6. Upon permit issuance and prior to beginning on-site mining activity, you must post a sign at the entrance of the mine site, which shall be clearly visible from the access road, with the following information (Rule 3.1.12):
- a. the name of the operator;
  - b. a statement that a reclamation permit for the operation has been issued by the Colorado Mined Land Reclamation Board; and,
  - c. the permit number.
- X 7. The boundaries of the permit boundary area must be marked by monuments or other markers that are clearly visible and adequate to delineate such boundaries prior to site disturbance.
- X 8. It is a provision of this permit that the operations will be conducted in accordance with the terms and conditions listed in your application, as well as with the provisions of the Act and the Mineral Rules and Regulations in effect at the time the permit is issued.
- X 9. Annually, on the anniversary date of permit issuance, you must submit an annual fee (\$1,150), and an annual report which includes a map describing the acreage affected and the acreage reclaimed to date (if there are changes from the previous year), any monitoring required by the Reclamation Plan to be submitted annually on the anniversary date of the permit approval. Annual fees are for the previous year a permit is held. For example, a permit with the anniversary date of July 1, 1995, the annual fee is for the period of July 1, 1994 through June 30, 1995. Failure to submit your annual fee and report by the permit anniversary date may result in a civil penalty, revocation of your permit, and forfeiture of your financial warranty. It is your responsibility, as an operator, to continue to pay your annual fee to the Office until the Board releases you from your total reclamation responsibility.

**Certification:**

As an authorized representative of the applicant, I hereby certify that the operation described has met the minimum requirements of the following terms and conditions:

1. This mining operation will not adversely affect the stability of any significant, valuable and permanent man-made structure(s) located within two hundred (200) feet of the affected lands. (However, where there is an agreement between the applicant/operator and the persons having an interest in the structure that damage to the structure is to be compensated for by the applicant/operator (Section 834-32-115(4)(d), C.R.S. 1984, as amended), then mining may within 200 feet. Proof of an agreement must be submitted to the Office prior to the decision date.)
2. No mining operation will be located on lands where such operations are prohibited by law (Section 34-32-115(4)(f), C.R.S. 1984, as amended).
3. As the applicant/operator, I do not have any mining/prospecting operations in this state of Colorado currently in violation of the provisions of the Mined Land Reclamation Act (Section 34-32-120, C.R.S. 1984, as amended) as determined through a Board finding. \*(See below.)
4. I understand that statements in the application are being made under penalty of perjury and that false statements made herein are punishable as a Class 1 misdemeanor pursuant to Section 18-6-503, C.R.S. 1984, as amended.

*This form has been approved by the Mined Land Reclamation Board pursuant to Section 34-32-112, C.R.S., of the Mined Land Reclamation Act. Any alteration or modification of this form shall result in voiding any permit issued on the altered or modified form and subject the operator to cease and desist orders and civil penalties for operating without a permit pursuant to Section 34-32-123, C.R.S.*

Signed and dated this 27th day of March, 2013.

Cotter Corporation (N.S.L.)

Applicant/Operator Name

Signature: [Signature]

Title: PRESIDENT

State of California

)ss.

County of San Diego

If Corporation Attest (Corporate/ County Seal)

By: [Signature]

Corporate Secretary or Equivalent  
Town/City/County Clerk

The foregoing instrument was acknowledged before me this 27th day of March, 2013.

Kenneth J. Mushinski  
by \_\_\_\_\_ as President of Cotter Corporation (N.S.L.)



[Signature]  
Notary Public

My Commission expires: 9/10/16

**SIGNATURES MUST BE IN BLUE INK**

\*An exception is that the Mined Land Reclamation Board ("Board") issued Findings of Fact, Conclusions of Law, and Order, in the matter of Cotter Corporation's Possible Violations, Cease and Desist Order, Corrective Actions, and Civil Penalties, File No. M-1977-300, Notice of Violation No. MV-2010-018, dated August 11, 2010, as amended September 2012, relating to the Schwartzwalder Mine. This exception, however, is being resolved through an Agreement between Cotter Corporation (N.S.L.) and the Colorado Division of Reclamation, Mining and Safety entered into on September 12, 2012 ("Agreement") for addressing conditions at the Schwartzwalder Mine and through Application Amendment 4 to Mine Permit M-1977-300. The Board has approved the foregoing Agreement. In that Agreement, Cotter made no admissions.

Exhibit A  
Legal Description and Location Map  
LP-21 Mine Permit Amendment  
M-1977-305

The main entrance to the LP-21 Mine is located at 38°17'55.33" N 108°44'14.48" W at 6500 feet in elevation. From Colorado Hwy 141, approximately 2.5 miles northwest of Naturita, turn onto Colorado Hwy 90 (Paradox Valley Highway). Travel approximately 5 miles and turn right onto County Road EE22 (Long Park Road). Travel approximately 7.5 miles and turn right onto the entrance road, then travel 0.1 miles to the reclaimed waste rock pile. See Exhibit C, figure C3 - Maps for location of affected land, roads, structures and mine permit boundary.

Permitted acreage for LP-21 is located within the following quarter-quarter sections of T47N, R17W, NMPM, Montrose County, Colorado:

Section	Quarter-Quarter	Disturbance	Revised acreage	Original acreage
22	SW ¼ of SE ¼	*Road	n/a	0.24
27	SW ¼ of SE ¼	Road	0.24	n/a
27	SE ¼ of NW ¼	Vent hole # 2 and Road	2.12	0.99
27	SE ¼ of SW ¼	Road	.40	n/a
27	NW ¼ of SE ¼	Vent hole #3 and Road	1.02	n/a
27	SW ¼ of NW ¼	Vent hole #4A and Road	0.51	0.39
27	NE ¼ of SW ¼	Vent hole #4	0.40	n/a
27	SW ¼ of NW ¼	Vent hole #5 and Road	0.36	n/a
27	NW ¼ of SW ¼	Vent hole #6 outside of permitted road area	0.47	0.47
27	SW ¼ of NW ¼	Surface facilities dump, entrance roads	11.93	7.42
27	SW ¼ of NE ¼	Vent hole # 1 and Road	0.87	0.87
27	NE ¼ of NE ¼	*Vent hole and Road	n/a	0.60



27	NW ¼ of NE ¼	*Road	n/a	0.61
27	SE ¼ of NE ¼	*Road	Incorporated into acreage for vent hole #5	0.28
27	NE ¼ of NW ¼	*Road	Incorporated into acreage for vent hole #4	0.33
27	NE ¼ of SW ¼	*Road	Incorporated into acreage for vent hole #4A	0.50
27	NE ¼ of SE ¼	Road	Incorporated into acreage for vent hole #2	0.35
27	NW ¼ of SE ¼	Road	Incorporated into acreage for vent hole #3	0.15
TOTAL			18.32	13.20

\*The roads and vent hole located within the following quarter-quarter sections of T47N, R17W, NMPM, Montrose County, Colorado were found to be inaccurately described in the original mining plan. The correct quarter-quarter sections have been identified and the acreages for all roads have been incorporated into the acreages of the vent holes associated with each road.

Section	Quarter-Quarter	Disturbance	Acreage
27	NE ¼ of NE ¼	Vent hole and road	0.60
22	SW ¼ of SE ¼	Road	0.24
27	NW ¼ of NE ¼	Road	0.61
27	SE ¼ of NE ¼	Road	0.28
27	NE ¼ of NW ¼	Road	0.33
27	NE ¼ of SW ¼	Road	0.50
TOTAL			2.56

Table of Proposed Surface Disturbances

All sections below are located in T47N. R17W. NMPM, Montrose County, Colorado:

Section	Quarter-Quarter	Disturbance	Revised acreage	Original acreage
22	SW ¼ of SE ¼	*Road	n/a	0.24
27	SW ¼ of SE ¼	Road	0.24	n/a
27	NW ¼ of SE ¼ NE ¼ of SE ¼ (road)	Vent hole # 2 and Road	2.12	0.99
27	SE ¼ of SW ¼	Road	.40	n/a
27	NW ¼ of SE ¼	Vent hole #3 and Road	1.02	n/a
27	SW ¼ of NW ¼	Vent hole #4A and Road	0.51	0.39
27	NE ¼ of SW ¼	Vent hole #4	0.40	n/a
27	SW ¼ of NW ¼	Vent hole #5 and Road	0.36	n/a
27	NW ¼ of SW ¼	Vent hole #6 outside of permitted road	0.47	0.47
27	SW ¼ of NW ¼	Surface facilities dump, entrance roads	11.93	7.42
27	SW ¼ of NE ¼	Vent hole # 1 and Road	0.87	0.87
27	NE ¼ of NE ¼	*Vent hole and Road	n/a	0.60
27	NW ¼ of NE ¼	*Road	n/a	0.61
27	SE ¼ of NE ¼	*Road	Incorporated into acreage for vent hole #5	0.28
27	NE ¼ of NW ¼	*Road	Incorporated into acreage for vent hole #4	0.33
27	NE ¼ of SW ¼	*Road	Incorporated into acreage for vent hole #4A	0.50
27	NE ¼ of SE ¼	Road	Incorporated into acreage for vent hole #2	0.35
27	NW ¼ of SE ¼	Road	Incorporated into acreage for vent hole #3	0.15
TOTAL			18.32	13.20

## ATTACHMENT 2

