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Cc: BLM_UT_SO_UT912[blm_ut_so_ut912@blm.gov]; Lisa Bryant[lmbryant@blm.gov]
From: Barangan, Jayson
Sent: 2017-08-30T22:49:47-04:00
Importance: Normal
Subject: Draft decision memos - Daneros and La Sal
Received: 2017-08-30T22:50:54-04:00
[Daneros Uranium Mine Decision Document FINAL DRAFT_jb_8.30.17.doc](#)
[La Sal Uranium Mine Decision Document_jb_FINAL DRAFT_8.30.17.doc](#)

All -

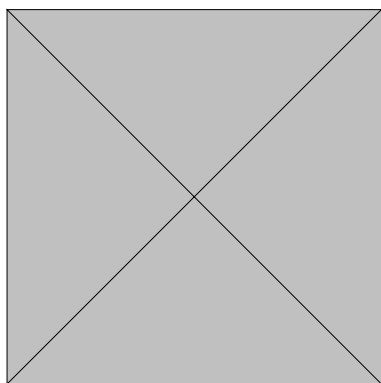
Attached are the draft decision memos for next week's pre-brief. I took a very tight and succinct approach with the memos considering the intended audience. The briefing papers and comm plans for both fed the content for the decision memos, but there will definitely need to be additional final touches before we can greenlight - please note the comments and be prepared to discuss.

Considering both projects are in Canyon Country, it makes sense for Lance to lead the brief. For the WO briefing we will not be using PPT. We'll probably need to provide maps and photos. If ASLM will be on the briefing, 600 has advised that we have the Canyon Country TO and a list of current vacancies handy.

Much thanks to Lisa and Ryan for the initial legwork with the BP and comms plan for both projects. We'll need to finalize the comms plans when we get the go ahead to make the decisions. Thanks!

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Respectfully,



Jayson Barangan

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DATA CALL ON PROPOSED RECORDS OF DECISION AND OTHER SIGNIFICANT DECISION DOCUMENTS

Date: September 11, 2017

To: James E. Cason, Acting Deputy Secretary of the Interior

Through: Katharine S. MacGregor, Acting Assistant Secretary
Land and Minerals Management

From: Michael D. Nedd, Acting Director of the Bureau of Land Management

Bureau/Office: Bureau of Land Management Utah

Title of Document: La Sal Uranium Mines Complex Plan Modification

ONE PARAGRAPH SUMMARY OF PROPOSED DECISION

The Moab Field Office and the Manti Sal National Forest plan to sign decisions approving a mine plan modification to the La Sal Uranium Mines Complex (Pandora, La Sal, Beaver Shaft and Snowball mines) near the town of La Sal in San Juan County. The decision would consolidate two plans of operation for the four mines, authorizing expanded operations in phases new facilities and mine portals on BLM lands; exploration drilling and ventilation shaft installation on BLM, USFS, Utah School and Institutional Trust Lands Administration (SITLA) and private lands resulting in 38 and 24 acres of surface disturbance on BLM and USFS lands, respectively. Projected ore production would be up to 945,000 tons over 20 years. Ore would be transported about 75 miles to the White Mesa Mill. The EA was completed in June 2017; its associated FONSI and DR are prepared and ready for signature. The BLM was the lead in preparing the EA, with USFS as a cooperating agency. Manti Sal National will issue a separate, concurrent decision based on the EA

NEED AND DEADLINE FOR ISSUANCE

In 2009, Denison Mines Corporation submitted an application to modify the La Sal complex mining plan of operations to the BLM and USFS; Energy Fuels acquired the complex in 2012. If approved, expansion activities would commence in INSERT DATE. If a decision is delayed, these activities would likely be postponed until INSERT DATE. With the current upward trend in the uranium market, a delay would prevent potential employment opportunities to the local community. As such, deadline for issuance is as soon as possible. This project aligns with the President's America First energy Plan.

POSITIONS OF AFFECTED STAKEHOLDERS

Organizations including Uranium Watch, Living Rivers, Canyonlands Watershed Council, Grand Canyon Trust, Center for Biological Diversity and Sierra Club submitted joint comments for the

Attachment 1 1

Commented [BJC1]: This is information extracted from the draft comms plan and BP. These are proposed activities described in the modification, correct?

Commented [BJC2]: In the BP and the draft comms plan, this figure is disclosed in cubic feet. The Daneros materials express the projected ore production in tons. Converted the cubic feet figure in tons so there is consistency between the Daneros and La Sal decision documents.

Commented [BJC3]: The comm plan and BP indicate that the analysis was joint. I am assuming that BLM was the lead agency. In the comm plan's project timeline, it is not clear. Is "separate, concurrent" the appropriate language?

Commented [BJC4]: In the draft comms plan and BP, it is not if Energy Fuels "inherited" Denison's application or if they had to submit a new application for modification.

environmental assessment and proposed an “Environmental Protection Alternative” the proposed alternative was not analyzed in detail as components of this alternative were already present in other considered alternatives

Commented [BJC5]: This was extracted from the comm plan and BP, but it doesn't really state what their positions were.

Members for the general public expressed concerns about wildlife, noise pollution, radiation and plans to ensure successful reclamation. The environmental assessment assessed these impacts, and the modified mining plan of operation includes measures to minimize these impacts and outlines a detailed reclamation plan.

Commented [BJC6]: Please make sure this is accurate.

OTHER RELEVANT CONSIDERATIONS

[Include: public lands affected, revenue, and jobs]

The proposed mining plan of operations modification would disturb 38 acres on BLM and 24 acres on USFS. Approving the modification would employ up to 130 miners and support personnel and generate \$XXX in revenue, thereby providing a robust economic driver to the local economy.

Commented [BJC7]: Do we have a forecast for this?

ACTING DEPUTY SECRETARY'S DECISION:

_____ APPROVE _____ DISAPPROVE

COMMENT:

Date

James E. Cason

DATA CALL ON PROPOSED RECORDS OF DECISION AND OTHER SIGNIFICANT DECISION DOCUMENTS

Date: September 11, 2017

To: James E. Cason, Acting Deputy Secretary of the Interior

Through: Katharine S. MacGregor, Acting Assistant Secretary
Land and Minerals Management

From: Michael D. Nedd, Acting Director of the Bureau of Land Management

Bureau/Office: Bureau of Land Management Utah

Title of Document: Daneros Mine Plan Modification

SUMMARY OF PROPOSED DECISION

The Monticello Field Office plans to sign a decision approving a mine plan modification at the Daneros Mine, an underground uranium mine 67 miles west of Blanding in western San Juan County. Forty miles of haul route occurs on existing county roads and a State Highway within the Bears Ears National Monument. The decision would authorize expanded operations in phases new facilities at the previously mined Bullseye and South Portal Areas, additional exploration drilling, improve access roads, install a water supply well and install up to eight ventilation shafts resulting in an increase in surface disturbance from 4.6 to 46 acres. The decision also allows for expansion into three existing waste rock dump sites, which would eventually be reclaimed. Projected ore production would increase up to 100,000 tons over seven years and up to 500,000 tons over 20 years. Ore would be transported about 60 miles to the White Mesa Mill. The EA was completed in June 2017; its associate FONSI and DR are prepared and ready for signature.

Commented [B3C1]: This could be omitted from the document if we are prepared to discuss specifics of the mine plan modification proposal.

NEED AND DEADLINE FOR ISSUANCE

In 2013, Energy Fuels submitted an application to modify its existing mining plan of operations. If approved, expansion activities would commence in INSERT DATE. If a decision is delayed these activities would likely be postponed until INSERT DATE. With the current upward trend in the uranium market, a delay would prevent potential employment opportunities to the local community. As such, deadline for issuance is as soon as possible. The project aligns with the President's America First Energy Plan.

Commented [B3C2]: Can we state this?

POSITIONS OF AFFECTED STAKEHOLDERS

BLM is partnering with DOE, and Utah Division of Oil, Gas and Mining to inventory the area's mines and assess reclamation opportunities. The Daneros Mine plan modification and its proposed reclamation plan supports this partnership.

Attachment 1 1

The Southern Utah Wilderness Alliance and Uranium Watch organizations are generally opposed to the project.

The National Park Service expressed concerns for fugitive dust and gaseous pollutants, noise pollution and impacts to night skies. The environmental assessment assessed these impacts and the modified mining plan of operation includes measures to minimize these impacts.

The Ute Mountain Ute Tribe expressed concerns about potential impacts of mill operations to the White Mesa community. The environmental assessment concludes that the production quantities outlined in the proposed mining plan of operations at the Daneros Mine would have negligible indirect and cumulative impacts to the White Mesa community.

Commented [BJC3]: What about direct impacts?

The Navajo Nation claims ancestral and cultural affiliation to prehistoric cultural groups that occupied the area. They expressed concern about sacred sites located in the Valley of the Gods, which is about 60 miles from the Daneros Mine. After the environmental assessment was revised to clarify their affiliation, they had no further concerns and asked to be kept informed should NAGPRA issues arise.

The Hopi Tribe also claims ancestral and cultural affiliation to prehistoric cultural groups in the area and expressed opposition to uranium mining. They did not provide comments on the environmental assessment.

OTHER RELEVANT CONSIDERATIONS

[Include: public lands affected, revenue, and jobs]

The proposed mining plan of operations modification would expand the Daneros Mine by 41 acres. Approving the modification would employ to 40 miners and support personnel and generate \$XXX in revenue, thereby providing a robust economic driver to the local economy.

Commented [BJC4]: Do we have a forecast for this?

ACTING DEPUTY SECRETARY'S DECISION:

_____ APPROVE _____ DISAPPROVE

COMMENT:

Date

James E. Cason