Ore Stockpile Pad Design Report
Piñon Ridge Project
Montrose County, Colorado

Prepared for:

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October 2008

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EXECUTIVE SUMMARY

Energy Fuels Resources Corporation (EFRC) is in the process of completing designs for a uranium mill, termed the Piñon Ridge Project, located in Montrose County, Colorado. Golder Associates Inc. (Golder) was contracted to provide geotechnical design for construction of the tailings cells, evaporation ponds and ore pads at the Piñon Ridge Project. Golder's design scope of work for the ore stockpile pads includes:

- Conducting a geotechnical field and laboratory investigation of the proposed facility area;
- Reviewing available data and regulatory requirements, and development of project design criteria; and
- Design of the ore stockpile pads and associated stormwater collection pond.

Ore materials to be stockpiled at the Piñon Ridge Project are expected to be non-acid generating, with ore derived predominantly from the Salt Wash Unit of the Morrison Formation. The proposed 1-acre ore stockpile pad will be constructed with reinforced concrete immediately to the north and east of the dump hopper. The proposed 5-acre ore stockpile pad will be constructed with a liner and protective cover around the 1-acre pad to its north, south, and east, geometrically designed to minimize the haul distance from all areas of the pad to the hopper. It is anticipated that the ore stockpile pad will be accessed via loaders and trucks on a consistent basis.

One or more ore stockpiles will be placed on the pad to a maximum design height of 30 feet. The ore stockpile pad will be surrounded by berms on all sides to provide drainage isolation, with the base of the pad sloped to the northeast toward a lined channel connecting to the East Stormwater Collection Pond. The East Stormwater Collection Pond will be separated from the 5-acre ore pad by a concrete sediment trap, connected to a truck wash station (designed by others). Sediments collected in the sediment trap will be excavated as needed, and placed within the limits of the lined 5-acre ore pad. A dumping platform is proposed for construction on the east side of the 5-acre ore pad to limit haul truck traffic on the ore pad itself, while also limiting radiation exposure of the trucks.

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1.0 INTRODUCTION

Energy Fuels Resources Corporation (EFRC) is in the process of completing designs for a uranium mill, termed the Piñon Ridge Project, located in Montrose County, Colorado. Golder Associates Inc. (Golder) was contracted to provide geotechnical design for construction of the tailings cells, evaporation ponds and ore pads at the Piñon Ridge Project. Construction of two attached but distinct ore stockpile pads are proposed for the Piñon Ridge Project. A reinforced concrete 1-acre ore pad is proposed adjacent to the dump hopper, with a 5-acre lined ore pad extending radially north, south, and east from the 1-acre pad.

1.1 Property Location

The Piñon Ridge Project is located in Montrose County, Colorado in the Paradox Valley, approximately 15 miles northwest of the town of Naturita on Highway 90. The physical address of the site is 16910 Highway 90, Bedrock, Colorado. The site coordinates are approximately latitude 38° 15' N and longitude 108° 46' W, at approximately 5,500 feet above mean sea level (amsl). The property is located within Sections 5, 8, and 17, Township 46 North, and Range 17 West. The site lies in the gently sloping base of the northwest-trending Paradox Valley with steep ridges on either side. Drawing 1 presents a general location map for the Piñon Ridge property.

1.2 Scope of Work

Golder's design scope of work for the ore stockpile pads includes:

- Conducting a geotechnical field and laboratory investigation of the proposed facility area;
- Reviewing available data and regulatory requirements, and development of project design criteria; and
- Design of the ore stockpile pads and associated stormwater collection pond and site features.

The design for the proposed ore stockpile pads is presented in Drawings 1 through 14.

2.0 GENERAL SITE CONDITIONS

The Piñon Ridge Project is situated in the Paradox Valley of western Colorado at an approximate elevation of 5,500 feet above mean sea level (amsl). The site terrain is gently sloping toward the north, with shallow to moderately incised arroyos across the property. The northern half of the site is generally covered in dense sagebrush while the southern half is sparsely vegetated with grass and cacti.

From a geological perspective, the Paradox Valley was formed by an anticline heavy in evaporites. As the evaporites began to dissolve, part of the anticline sank forming the Paradox Valley. The bedrock underlying the site primarily consists of claystone and gypsum of the Hermosa Formation. The gypsum generally shows a massive texture, whereas the claystone is typically highly fractured. Less significant zones of sandstone, conglomerate, and siltstone of the Cutler and Moenkopi Formations were also encountered during the field investigation. Groundwater in the vicinity of the ore pads is deep, on the order of 400 feet below the ground surface. Refer to Golder (2008) for details of the geotechnical field investigation and laboratory test program.

2.1 Climate

The macro-climate of the Piñon Ridge Project area is classified by the Koppen Climate Classification System as a BSk, which indicates a semi-arid steppe with much of the characteristics of a desert (Kleinfelder, 2007a). Evaporation exceeds precipitation on average, and the mean average temperature is below 64.4 degrees Fahrenheit (Kleinfelder, 2007a). The predominant wind directions for the site are East and East-Southeast, with an average wind speed of 5.3 miles per hour (mph) (Kleinfelder, 2007b).

2.2 Seismicity

The design ground motions for the Piñon Ridge Project site were identified by Kleinfelder (2008), including a moment magnitude M 4.8 earthquake occurring at a distance of 15.5 kilometers (km) from the site. The design peak ground acceleration (PGA) is 0.11g. The Maximum Credible Earthquake (MCE) event corresponds to a PGA of 0.16g. Kleinfelder (2008) indicates that these values were derived from the International Building Code (IBC).

2.3 Geotechnical Conditions

The Phase 2 geotechnical field and laboratory investigation conducted for the Piñon Ridge Project is provided under separate cover in Golder (2008), with relevant portions summarized here. Drill holes GA-BH-44 through GA-BH-46 in the ore stockpile pad area were drilled to depths ranging from 39 to 50 feet. Bedrock was not encountered in any of these holes. Test pits GA-TP-09 and GA-TP-10, also excavated in the ore pad area, revealed overburden soils similar to those in the drill holes. Compared to test pit excavations across the remainder of the site, the required excavation effort in these two test pits was noticeably easier, indicative of softer soils. Additionally, Kleinfelder's Phase 1 investigation included borehole PR1-18 and Phase 2 geotechnical investigation included boreholes TB-4, TB-5, TB-9, TB-10, TB-15, and TB-20 in the ore stockpile pad area. Borehole PR1-18 was advanced using 8.5-inch hollow stem auger to 31.5 feet, and the Phase 2 borings were advanced using 6-inch diameter hollow stem auger to depths ranging from 19 to 50.5 feet.

The overburden soils generally consist of windblown loess (i.e., ML and SM) with occasional traces of debris flow alluvium (i.e., ML and SM with trace gravel and cobbles). Occasional layers of sandy clay were encountered in TB-4 and TB-9. Blowcounts in the overburden materials underlying the ore pad area ranged from 4 to refusal (i.e., greater than 50 blows per 6 inches).

Laboratory testing indicated that the loess has a potential to collapse upon wetting (i.e., hydro-collapse). Measured collapse of in-situ (i.e., undisturbed) soil samples ranged from 3.9 to 16.7 percent, averaging 7.3 percent. Applied loads during wetting (and collapse measurement) ranged from 2 to 8 kips per square foot (ksf). Hydro-collapse settlements of this magnitude could possibly lead to substantial differential settlements, which could disrupt surface drainage on the pad and possibly breach the ore pad containment features (i.e., reinforced concrete and GCL). Therefore, the design emphasizes construction of a continuous containment layer over a well prepared foundation, covered as needed with a protective layer to minimize the potential for damage from truck and loader traffic. A second layer of defense against hydro-collapse settlements beneath the ore pads will be provided during operations in the form of a regular inspection and maintenance program to identify locally distressed areas and allow timely repairs.

3.0 ORE PAD DESIGN

This section provides the engineering analyses and technical details to support design of the ore stockpile pads and associated facilities for the Piñon Ridge Project.

3.1 Design Criteria and Design Concepts

3.1.1 Design Criteria

Design criteria relevant to the design analyses for the ore stockpile pads and associated facilities are summarized below.

Key Regulatory Requirements:

Ore Stockpile Pad: State Board of Health, Licensing Requirements for Uranium and Thorium Processing, 6 CCR 1007-1, Part 18. Appendix A, Criterion 5H states, "Steps must be taken during stockpiling of ore to minimize penetration of radionuclides into underlying soils; suitable methods include lining and/or compaction of ore storage areas."

Seismic Design:

Maximum Credible Earthquake (MCE): 0.161g peak ground acceleration (PGA) based on a Magnitude 4.8 earthquake at 15.5 km (Kleinfelder, 2008).

Design Earthquake (DE): 0.107g PGA based on two-thirds of MCE PGA (Kleinfelder, 2008).

Stability Requirements:

Minimum Static Factor of Safety: 1.5 (industry standard practice).

Minimum Pseudo-static Factor of Safety: 1.1 (industry standard practice).

Seismic Coefficient for Stability: 50 percent of the horizontal PGA (Hynes & Franklin, 1984).

East Stormwater Collection Pond:

100-year, 24-hour Storm Event: 3.0 inches (Appendix B).

1,000-year, 24-hour Storm Event: 4.4 inches (Appendix B).

Design Capacity: Containment for the 100-year, 24-hour storm event falling over the contributing area, with spillway capacity (leading to the West Stormwater Pond) to accommodate the 1,000-year, 24-hour storm event falling over the contributing area after initial filling of the pond.

3.1.2 Ore Pad Liner System Design Concepts

The 1-acre ore pad will be lined with reinforced concrete and designed to minimize infiltration and maximize runoff to the adjacent 5-acre ore pad. Concrete design for the 1-acre ore pad includes water stops to minimize infiltration at construction joints.

The 5-acre ore stockpile pad will be lined with a reinforced geosynthetic clay liner (GCL) placed in contact with prepared subgrade materials. Cover soils will be constructed over the GCL layer to distribute loads and minimize the potential for damage from truck and loader traffic.

3.1.3 Dumping Platform Design Concepts

To allow for end-dumping haul trucks to deposit ore on the 5-acre ore pad without having to drive into the permit boundary, a raised dumping platform has been designed. In this design, end-dumping haul trucks will back up to and dump over a bumper extending above a retaining wall onto the 5-acre ore pad. By dumping ore over the permit boundary instead of driving into the permit boundary, the haul trucks are expected to remain "clean," thereby not requiring mandatory decontamination (i.e., washing). The radiation levels of the haul trucks will be confirmed prior to leaving the property, and the haul trucks will be washed if radiation levels exceed the acceptable levels. Haul trucks which travel directly on the ore pad will be required to go through the truck washing station prior to exiting the site.

A Hilfiker wall with welded wire mesh soil reinforcement is proposed to divide the ore end-dumping platform from the 5-acre ore pad. Backfill in the vicinity of the wall will consist of a free-draining aggregate, while the rest of the ore dumping platform will be constructed with compacted on-site soil. The 20 feet of the dumping platform closest to the wall will be surfaced with reinforced concrete (see Drawing 14), while the remaining 100 ft of platform width will be surfaced with aggregate base coarse materials.

The retaining wall is approximately 350 feet long, with a total constructed height of approximately 10 feet (plus an additional 1.5-foot bumper). This total height accounts for the 3.5 feet of cover fill placement over the ore pad liner material, with a minimum exposed wall height of approximately 8 feet. The 8-foot exposed wall height is estimated to accommodate a full end dump, assuming 24 tons of ore per load, an ore density of 100 pounds per cubic foot (pcf), an angle of repose of 40 degrees, and a dump truck spacing along the wall of 17.5 feet on center, without ore spilling back

over the wall. The face of the wall will be finished with reinforced shotcrete to provide protection to the Hilfiker wall facing units. The dump platform will be recessed 1.5 feet below the top of the wall to provide an axle-high bumper to prevent end dumps from backing over the wall. Drawings 8 through 11 show the general design layout, typical sections, and details associated with the dumping platform (provided by Hilfiker). The soil reinforcement lengths for the Hilfiker wall will be determined by the design-build contractor at the time of ore pad construction.

3.1.4 East Stormwater Collection Pond Design Concepts

The composite liner system being considered for the East Stormwater Collection Pond includes reinforced GCL consisting of a layer of sodium bentonite encapsulated between two geotextiles, overlain by a 60 mil smooth high density polyethylene (HDPE) geomembrane. The GCL proposed for the East Stormwater Collection Pond is Bentomat® ST manufactured by CETCO Lining Technologies, or an approved equivalent. The GCL will be placed over prepared subgrade.

A lined channel is designed to connect the 5-acre ore pad to the East Stormwater Collection Pond. The channel liner system is the same as that proposed for the East Stormwater Collection Pond.

The East Stormwater Collection Pond has been designed to contain the 100-year storm event as well as part of the 1,000-year, 24-hour storm event, with additional capacity being provided in the freeboard depth. A weirbox decant and pipe spillway leading to the West Stormwater Collection Pond (and ultimately to the Evaporation Ponds) is designed to transport the remaining runoff resulting from the 1,000-year storm event that cannot be contained within the pond. The required pond volume to provide containment for the 100-year, 24-hour storm event is approximately 4 acre-feet (see Appendix B). As the designed spillway is not capable of transporting the entire 1,000-year, 24-hour storm event, the capacity of the East Stormwater Collection Pond was increased to 4.65 acre-feet to accommodate the runoff that cannot be immediately handled by the spillway with a residual freeboard depth of 0.8 feet. Design calculations developed for sizing of the East Stormwater Collection Pond and associated channels and pipes were conducted by Kleinfelder and are presented in Appendix B. Water collected in the East Stormwater Collection Pond will be pumped back onto the stockpile for dust control as needed, or recycled for use in washing ore haulage trucks.

3.1.5 Sediment Trap Design Concepts

A sediment trap (designed by others) has been included along the channel leading from the ore pad to the East Stormwater Collection Pond. This sediment trap will essentially act as a stilling basin to retain sediment captured in runoff from the ore pad and from the truck wash. All vehicles traveling onto the ore pad will be washed immediately after exiting the pad, and all resulting contaminated water will flow directly into the sediment trap. Collected sediment will be periodically excavated from the sediment trap and deposited back onto the ore pad.

3.1.6 Closure Design Concepts

Closure of the ore pad at the end of the mine life will involve excavating all contaminated materials (concrete, liners, cushion material, etc.) and placing them within the lined limits of Tailings Cell C. A permanent closure cover will be constructed over the tailings cells. The closure cover design is described elsewhere.

3.2 Five-Acre Ore Pad Liner System Design

Cover material thickness over the lined 5-acre ore pad is designed to minimize stresses on the GCL liner from vehicular traffic. The proposed cushion material shall be constructed over the GCL by placement of cover material in lifts to achieve the required thickness, and moisture conditioned and compacted to a minimum specification of 95 percent of the standard Proctor maximum dry density. The total thickness of the cushion material was designed for the maximum anticipated equipment load (i.e., Caterpillar Model 988H Wheel Loader) based on a maximum allowable stress at the liner of approximately 8 pounds per square inch (psi). The cushion material thickness calculation is provided as Appendix A. Compaction of the cushion material will result in increased performance as a stress distribution layer.

The design cover material thickness of 3.5 feet is comprised of 1 foot of compacted Class 6 Aggregate Base Coarse Material over 2.5 feet of compacted on-site soils (cushion material). The compacted cover material over the GCL will act to further enhance the anticipated performance of the liner system as a flow barrier. The liner system (from top to bottom) includes:

- A 1.0-foot thick layer of compacted Class 6 Aggregate Base Coarse to act as a wearing surface;
- A 2.5-foot thick layer of compacted native site soils to act as the cushion layer;
- Reinforced GCL such as Bentomat® ST or equivalent; and
- Compacted subgrade.

The GCL proposed for the 5-acre ore stockpile pad is Bentomat® ST manufactured by CETCO Lining Technologies (CETCO), or an approved equivalent. Bentomat® ST is a reinforced GCL consisting of a layer of Volclay® sodium bentonite between two geotextiles, which are needlepunched together. The GCL will be placed directly over prepared subgrade. The proposed GCL provides good overall liner system stability at the proposed ore pad base grades, as well as providing a liner system with permeability characteristics appropriate for this application.

3.3 Stability Evaluation

Golder conducted global stability analyses for the proposed ore pad facility, excluding the retaining wall/dump platform. These analyses are presented in Appendix C. The cross-section analyzed considers the maximum embankment height combined with the maximum assumed ore stockpile height of 30 feet. These analyses consider three different failure zones: through the perimeter berm only, through the stockpile only, and global failure through the stockpile liner system. Post-closure analyses were not conducted as the ore pad will be excavated and placed in the tailings cells for permanent closure. Following excavation of the ore pad at closure, the site will be regraded to approximately its original topographic contours.

Stability analyses were conducted using RocScience's limit equilibrium program *SLIDE* (RocScience, 2000). Stability analyses considered both circular and non-circular slip surfaces when searching for the critical surface with the minimum factor of safety (*FS*). The stability analyses utilized the Spencer method (Spencer, 1967).

The pseudo-static coefficient for the stability analyses was developed by Kleinfelder (2008) for this evaluation based on the 2006 International Building Code (IBC). This seismicity analysis concluded that the peak ground acceleration (PGA) for the Maximum Credible Earthquake (MCE) is 0.161g. The peak ground acceleration for the design earthquake is 0.107g. Hence, the pseudo-static acceleration used in the stability analyses for operational considerations was 0.05g, or approximately 1-half of the design earthquake PGA (Hynes & Franklin, 1984).

The stability analyses show that the static and pseudo-static critical failure surfaces have factors of safety greater than the minimum allowable values of 1.5 under static loading conditions, and 1.1 under pseudo-static loading conditions. Internal stability of the retaining wall will be conducted by Hilfiker as part of the design-build contract at the time of retaining wall construction. Golder will conduct a global stability evaluation of the retaining wall/dump platform once reinforcement design is complete.

3.4 East Stormwater Collection Pond Design

The East Stormwater Collection Pond is designed to capture and reroute all runoff from the ore pads as well as runoff from surface areas adjacent to the ore pads. Upon reaching the height of the outlet works, solution collected in the pond is transported via an outlet pipe to the West Stormwater Collection Pond.

For pond sizing and design of the outlet, it was assumed that the 1,000-year storm event occurs immediately following the 100-year, 24-hour storm event (i.e., 4 acre-feet of water is stored in the pond prior to initiation of the 1,000-year, 24-hour storm event). Overflow from the East Stormwater Collection Pond will be conveyed through a weirbox to a 30-inch high density polyethylene (HDPE) pipe leading to the West Stormwater Collection Pond. Outflows from the West Stormwater Collection Pond ultimately lead to the Evaporation Ponds.

The East Stormwater Collection Pond contains three inlet structures. Two of these, the East Channel Inlet and West Channel Inlet, collect and convey surface runoff from areas adjacent to the ore pad facilities. The third inlet channel (on the south side of the pond) conveys runoff from the ore pad.

Kleinfelder performed the hydrologic analyses required for sizing the East Stormwater Collection Pond and associated inlet and outlet works, which are presented in Appendix B. The resulting pond can store 4.65 acre-feet of runoff while maintaining 0.8 feet of residual freeboard.

3.5 Concrete Design

Concrete design for the 1-acre ore pad, 20-foot wide ore dumping apron, and reinforced shotcrete for the retaining wall was performed by SM&RC Structural Engineers Inc. (SM&RC) of Lakewood, Colorado under subcontract with Golder. The wheel loads used for design were those associated with a CAT 988H Wheel Loader and a CAT 770 Off-Highway Truck. The wheel loader was specified by Golder, and the off-highway truck was conservatively chosen by SM&RC as only highway trucks are expected to travel on the ore pad and dumping platform areas. Highway haul trucks are expected to have gross operating weights (vehicle plus payload) of about 40 tons, while the design considers an off-highway truck with a gross operating weight of 78.5 tons. The finite element program *SAP 2000* was used to analyze the moments and shear forces resulting from loading by the design loader and truck. The concrete design assumes a modulus of subgrade reaction greater than or equal to 200 pounds per cubic inch (pci).

The resulting concrete design for the 1-acre ore pad and the dumping apron are the same. Major design concepts are as follows:

- Concrete slab thickness is 1.0 feet, tapering to 1.3 feet within 5 feet of the pad edges;
- In plan view, reinforcement is generally specified as No. 5 rebar spaced at 14 inches in both directions;
- The slab foundations should be comprised of compacted, non-frost susceptible soil to a minimum depth of 24 inches below the finished grade surface;
- Control joints are spaced at a maximum of 55 feet for the ore pad, and 40 feet for the dumping apron; and
- Water stops are prescribed for the 1-acre ore pad to minimize fluid migration through concrete joints, forcing runoff onto the lined 5-acre ore pad.

Design drawings and details provided by SM&RC are shown in Drawings 12 through 14. Calculations associated with the concrete design are provided in Appendix D.

4.0 USE OF THIS REPORT

This report has been prepared exclusively for the use of Energy Fuels Resources Corporation (EFRC) for the specific application to the Piñon Ridge Project. The engineering analyses reported herein were performed in accordance with accepted engineering practices. No third-party engineer or consultant shall be entitled to rely on any of the information, conclusions, or opinions contained in this report without the written approval of Golder and EFRC.

The site investigation reported herein was performed in general accordance with generally accepted Standard of Care practices for this level of investigation. It should be noted that special risks occur whenever engineering or related disciplines are applied to identify subsurface conditions. Even a comprehensive sampling and testing program implemented in accordance with a professional Standard of Care may fail to detect certain subsurface conditions. As a result, variability in subsurface conditions should be anticipated and it is recommended that a contingency for unanticipated conditions be included in budgets and schedules.

Golder sincerely appreciates the opportunity to support EFRC on the Piñon Ridge Project. Please contact the undersigned with any questions or comments on the information contained in this report.

Respectfully submitted,

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5.0 REFERENCES

6 CCR 1007-1, Part 18 – "*State Board of Health Licensing Requirements for Uranium and Thorium Processing*", specifically Appendix A (Criteria relating to the operation of mills and the disposition of the tailings or wastes from these operations).

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