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October 5, 2010

Mr. Edward Nichols  
State Historic Preservation Officer  
1560 Broadway, Suite 400  
Denver, Colorado 80202

RE: Piñon Mill Ridge Project

Dear Mr. Nichols:

ERO Resources Corporation (ERO), on behalf of Energy Fuels Corporation (EFC) and the Colorado Department of Public Health and Environment (CDPHE), is formally requesting review and consultation under the Colorado Register of Historic Places Act (CRS 24-80.1).

The Piñon Mill Project is a privately funded venture proposed on 880 acres of privately owned lands in Paradox Valley, Montrose County, Colorado. No federal land, permit, or funding is being applied to this project and, as such, the National Historic Preservation Act (NHPA, 1966, as amended) is not applicable. The project proponent, EFC, has undertaken a due diligence approach to cultural resource evaluation. All 880 acres were inventoried by ERO at an intensive level (Whitfield et al. 2007); an additional 80 acres were inventoried prior to well installation on the adjacent Cooper property (Whitfield et al. 2009).

In sum, the inventory of the 960 acres documented 24 cultural resources. Eight of the 24 sites were subject to controlled collection and analysis, six sites were trenched in order to evaluate their subsurface potential and to provide geomorphological context, and two sites were subject to archaeological treatment prior to anticipated ground disturbance (Sheptow and Larmore 2009). Several cultural resources identified during the inventory remain eligible for the National Register of Historic Places (NRHP). At this time, those sites that remain eligible for the NRHP will be avoided by ground-disturbing activities. A monitoring plan is recommended for implementation prior to project construction to mitigate the potential for unintended effects to eligible resources and for potential discoveries.

Please do not hesitate to contact me with any questions regarding this request. I may be reached at [slarmore@eroresources.com](mailto:slarmore@eroresources.com) or 970-422-2136.

Sincerely,

Sean Larmore  
Principal Investigator, Cultural Resources

cc: Phil Eigidi (CDPHE)  
Frank Filas (EFC)

## References

Whitfield, A., S. Larmore, and K. Croll

2007 Class III Cultural Resource Inventory and Evaluative Testing Results for the Energy Fuels Resources Pinon Mill Development Project, Montrose County, Colorado. Prepared for Kleinfelder, Albuquerque, NM.

Whitfield, A., S. Larmore, and K. Croll.

2009 Addendum: Class III Cultural Resources Inventory for Energy Fuels Resources Pinon Ridge Mill Project, Cooper Property, Montrose County, Colorado. Prepared for Energy Fuels Resources, Lakewood, CO.

Sheptow, D. and S. Larmore

2009 Addendum: III Cultural Resource Inventory and Evaluative Testing Results for the Energy Fuels Resources Pinon Mill Development Project, Montrose County, Colorado. Archaeological Treatment of Sites 5MN8269 and 5MN8270.