

September 7, 2011



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 Resources Corporation (Energy Fuels), the project proponent, and the Colorado Department of Public Health and Environment (CDPHE), is formally requesting review and consultation for the above referenced project. A determination of “no adverse effect” to historic properties is recommended for the project because no historic properties are located within the area of potential effect.

The Piñon Mill Project is a privately funded venture proposed on 880 acres of privately owned lands in Paradox Valley, Montrose County, Colorado. Other than an air permit approval from the Environmental Protection Agency (EPA), no federal land, permit, or funding is being applied to this project. The EPA has stated they will not require the applicant to comply with Section 106 of the National Historic Preservation Act (NHPA, 1966, as amended). A note to this effect will be provided in Energy Fuels’ project file. Regardless, Energy Fuels has undertaken a due diligence approach to cultural resources. ERO inventoried all 880 acres 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). All of the above-referenced reports have been submitted to the State Historic Preservation Office for review and consultation.

In sum, the inventory of the 960 acres documented 24 cultural resources. Of the 24 sites, 8 were subject to controlled collection and analysis thereby exhausting their data potential; 6 sites were trenched in order to evaluate their subsurface potential and to provide geomorphological context; and 2 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. The approved plan for cultural resources will be implemented prior to project construction (see attachment).

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

Sincerely,

A handwritten signature in black ink that reads 'Sean Larmore'.

Sean Larmore
Principal Investigator, Cultural Resources

Denver
1842 Clarkson St.
Denver, CO 80218
303.830.1188

Boise
3314 Grace St.
Boise, ID 83703
208.373.7983

Durango
1065 Main Ave., Ste. 200
Durango, CO 81301
970.422.2136

Western Slope
P.O. Box 932
161 South 2nd St.
Hotchkiss, CO 81419
970.872.3020

cc: Phil Eigidi (CDPHE)
Frank Filas (EFRC)
Dr. Angelique Diaz (EPA)

References Cited

Energy Fuels Resources Corporation and Visus Consulting Group, Inc.

2009 Operational Monitoring Plan, Pinon Ridge Mill Facility, Montrose County, Colorado. Prepared for the Colorado Department of Public Health and Environment, Radiation Management Program, Denver.

Sheptow, D. and S. Larmore

2009 *Addendum: Class 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.* Prepared for Energy Fuels Resources, Lakewood, CO.

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.