



State of Utah

GARY R. HERBERT
Governor

GREG BELL
Lieutenant Governor

Department of
Environmental Quality

Amanda Smith
Executive Director

DIVISION OF RADIATION CONTROL
Rusty Lundberg
Director

DRC-2010-006141



November 30, 2010

CERTIFIED MAIL
(Return Receipt Requested)

Ms. Jo Ann Tischier
Director, Compliance and Permitting
Denison Mines (USA) Corp. (DUSA)
1050 17th Street, Ste. 950
Denver, CO 80225

Dear Ms. Tischier:

SUBJECT: June 29, 2010 DUSA Submittal of Revision 3.2 of White Mesa Mill Reclamation Plan, Submitted in the form of an Addendum to Approved Reclamation Plan Revision 3.1; Utah RAM License No. UT1900479, Condition 9.11; Request for Information

We received the subject proposed Revision 3.2 of the Reclamation Plan (the Plan) via your cover letter dated June 29, 2010. As described in the letter, this revision was submitted in the form of an Addendum to existing approved Reclamation Plan 3.1. The purpose of Revision 3.2 was to provide closure design for the facility, including Tailings Cell 4B. We have reviewed subject Reclamation Plan Revision 3.2, and have the following comments:

1. The Table of Contents for the Plan needs to be adjusted as a consequence of the subject Addendum to the existing Reclamation Plan.
2. On page 1-1 of the redline copy, please retain the last sentence of the second full paragraph and the list of the facilities to be decommissioned on pages 1-1 through 1-2.
3. Existing Figure A-5.1-2 in approved Revision 3.1 appears to contain cross sections and details which are essential to be retained in the Reclamation Plan.
 - a. Therefore, existing Figure A-5.1-2 must somehow be retained and not replaced by the Addendum.
 - b. In other elements of the Plan, the existing Figure A-5.1-2, and Figure A-5.1-4 in the existing plan need to include, as appropriate, the design as well as the associated drawings for a sub rip-rap tailings filter blanket.
4. In accordance with the subject License Condition 9.11, the Plan needs to describe the use of new permanent fixtures or facilities that have been installed or are contemplated to be constructed in conjunction with the reclamation of Cells 4A and 4B. We suggest this be accomplished by referencing the specific as-built drawings, DMT, and BAT O&M Plans for these facilities.

5. Existing Figure 3.2.3-1 is contained in Reclamation Plan 3.1. This figure is a site map of the mill and ore pad. However, the figure does not reference the distinct boundaries of the ore storage pad as provided by a map in the DMT Plan, and as defined by coordinates in Part I.D.3.f of the Ground Water Discharge Permit. Please incorporate these references in the Plan, or adjust the figure appropriately to include these boundaries.
6. We request that the cover and the text of Reclamation Plan be revised to state that Reclamation Plan Revision 3.2 is in the form of an Addendum to Reclamation Plan 3.0 and 3.1.
7. Attachment C to the subject Plan included a revised surety estimate that is out-dated. We acknowledge more recent surety cost estimates provided by DUSA on March 3, August 19, and October 15, 2010. We have also most recently asked DUSA to modify its 2010 surety estimate in a November 16, 2010 Request for Information letter. Therefore, please be advised that any future DRC approval of Revision 3.2 will not include any approval of the existing Attachment C.
8. The revised Plan edition of Reclamation Plan Revision 3.2 (i.e. the Addendum) will need to be identified by a unique edition name, but still retain the Reclamation Plan Revision 3.2 label, e.g. "Edition A," or other method for identifying the unique edition.

Please review the above comments, and respond in writing submitting a unique revised edition of Reclamation Plan Revision 3.2 for approval. Per my telephone conversation with Mr. Harold Roberts of DUSA on November 30, 2010, he committed that DUSA will fully respond to the above within 15 calendar-days of receipt of this letter. If you have any questions on the above, please contact me.

Sincerely,



David A. Rupp, P.E.
Geotechnical Services Section

DAR:dr