

**FOURTH QUARTER 2008 DATA REPORT
(THIRD QUARTER OF BASELINE)
FOR AMBIENT AIR MONITORING
ENERGY FUELS RESOURCES CORPORATION
URANIUM MILL LICENSING SUPPORT
PIÑON RIDGE MILL
MONTROSE COUNTY, COLORADO
KLEINFELDER PROJECT NO. 83088**

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1.0 INTRODUCTION

This Quarterly Report provides data required for the assessment of air quality. These data will be used for the environmental baseline study at Energy Fuels Resources Corporation (EFR) proposed Piñon Ridge Mill (the "Site") located in Montrose County, Colorado. Data were collected at five air monitoring stations (network). Three stations are located on site, with one station upwind and one downwind of the site vicinity in order to obtain a representative block of data for assessment.

The project is under the regulation of the Colorado Department of Public Health and Environment (CDPHE) and the mill license (radioactive source materials license), will be issued and administered by CDPHE. Monitoring sites were chosen according to guidance outlined in Nuclear Regulatory Commission (NRC) Regulatory Guide (Reg. Guide) 3.63 Onsite Meteorological Measurement Program for Uranium Recovery Facilities – Data Acquisition and Reporting (NRC Reg. Guide 3.63); NRC Reg. Guide 4.14 Radiological Effluent and Environmental Monitoring at Uranium Mills (NRC Reg. Guide 4.14); and Environmental Protection Agency (EPA) Meteorological Monitoring Guidance for Regulatory Modeling Applications (MMGRMA) (EPA-454/R-99-005).

The Site is located 14 miles northwest of Naturita at 16910 Highway 90, Montrose County, Colorado. The property consists of approximately 880 acres that include the Southwest $\frac{1}{4}$ of the Southeast $\frac{1}{4}$ of Section 5, all of Section 8, the North $\frac{1}{4}$ of Section 17, and the Southeast $\frac{1}{4}$ of the Northwest $\frac{1}{4}$ of Section 17, Township 46 North, Range 17 West, of the New Mexico Principal Meridian. See Figure 1 for the property layout.

2.0 PROGRAM DESCRIPTION AND MONITOR SITE DESCRIPTIONS

2.1. Ambient Air Monitoring Time Period

Based on NRC Reg. Guides 3.63 and 4.14, pre-operational particulate matter air monitoring must occur for at least twelve months prior to the submittal of the radiation permit application at Sites #1 and #2 (see Figures 1 and 2 for monitoring site locations). The Tisch Hi-Vol samplers are used to monitor radionuclides at all five monitoring locations. Particulate matter ≤ 10 microns (PM10) samples are also collected at Sites #1 and #2 under Environmental Protection Agency (EPA) sampling protocol.

This report summarizes the monitoring activities conducted during the fourth quarter 2008, which is the third three months (third quarter baseline) of the twelve months required for the radiation permit application. This report provides data collected between October 1, 2008 and December 31, 2008.

2.2. Selection of Monitoring Sites

Selection of air monitoring station locations was based on both the pre-operational and operational air monitoring criteria set forth in NRC Reg. Guide 4.14. Three monitoring locations were selected near the Site boundaries. A fourth location was selected as a background location to the northwest and a fifth location was selected at the nearest residence located to the southeast. Wind direction is predominantly from northwest and from the southeast depending on time of day due to the presence of a down-valley/up-valley flow through the area.

The five selected monitoring locations are discussed below:

Air Monitoring Site #1: This location is also referred to as Met Site #1 and is located near the northern boundary of the Site. This location includes the 10 meter (10m) meteorological tower, one of the two onsite PM₁₀ monitoring locations, and an air monitor for radionuclide sampling.

Air Monitoring Site #2: This location is also referred to as Met Site #2 and is located near the eastern boundary of the Site. This location includes the 30 meter (30m) meteorological tower, one of the two on-site PM₁₀ monitoring locations, and an air monitor for radionuclide sampling.

Air Monitoring Site #3: This location is also referred to as the West Site and is located near the western boundary of the Site. This location includes an air monitor for radionuclide sampling.

Air Monitoring Site #4: This location is also referred to as the Cooper Site and is located northwest of the Site. This site is assumed to be upwind. This site will be the background site following startup of operations. This location includes an air monitor for radionuclide sampling.

Air Monitoring Site #5: This location is also referred to as the Carver Site and is located southeast of the Site. This site is assumed to be a downwind site, and was chosen as the site of the nearest residence. This location includes an air monitor for radionuclide sampling.

2.3. Locations

The Site is located at 16910 Highway 90, Montrose County, Colorado. See Table 1 and Figures 1 and 2 for locations of the monitoring sites.

Table 1 – Monitor Site Locations

Locations	UTM Zone 12 (NAD83)	
	Easting	Northing
Site #1 (North Site) – 10m Tower	695211.43	4237487.24
Site #2 (East Site) – 30m Tower	695930.42	4235452.56
Site #3 (West Site)	694443.09	4235724.28
Site #4 (Cooper Site) – Upwind Resident	691915.11	4239229.41
Site #5 (Carver Site) – Downwind Resident	700247.01	4232787.61

3.0 DATA COLLECTION AND COMPLETENESS

According to the Prevention of Significant Deterioration (PSD) regulations, the data recovery goal for meteorological data is 90% data recovery per quarter. The PSD data recovery goal for pollutant data is 80% per quarter. The minimum annual acceptable data recovery for PM₁₀ data is 75% valid data.

3.1. Meteorological Data

Meteorological data were collected continuously at Sites #1 and #2 from October 1 through December 31 2008 and are reported in Appendix A. EPA Air Quality System (AQS) data qualifiers were used to flag invalid data. Data qualifiers used for meteorological data this

quarter include: BA – Maintenance/Routine Repairs, AQ – Collection Error, AT – Calibration, AZ – Audit, and IL – Seasonally Out of Service.

Daily, weekly, and monthly checks were performed on meteorological equipment at each site according to standard operating procedures (SOPs) presented in the Energy Fuels Resources Corporation Uranium Mill Licensing Support Ambient Air Monitoring Plan Piñon Ridge Mill Site, 2008.

Site #1 includes the 10m tower and the following parameters are measured based on EPA MMGRMA guidance:

- wind speed, wind direction, and sigma theta
- vertical wind speed,
- temperature,
- relative humidity,
- delta temperature,
- barometric pressure,
- solar radiation,
- precipitation, and
- evaporation.

At the 10m level, wind speed, wind direction, sigma theta, vertical wind speed, and delta temperature are measured. At the 2m level, temperature, relative humidity, delta temperature, barometric pressure, and solar radiation are measured. At the ground level, precipitation and evaporation are measured.

Evaporation data is scheduled for collection between April 1 and October 31 of each year. The evaporation pan and gauge were taken offline on November 12, 2008 and will be stored until the beginning of the next operational season. Evaporation pan operation includes routine cleaning, addition and/or removal of water, and calibration. Evaporation data were flagged with the maintenance/routine repairs data qualifier, BA, and the calibration data qualifier, AT. The IL data qualifier will be used to flag the evaporation column of data during the off season. Average evaporation data are reported for the month of October in Table 6.

Site #2 includes the 30m tower and the following parameters are measured based on EPA MMGRMA guidance:

- wind speed, wind direction, and sigma theta,
- vertical wind speed,
- temperature,
- relative humidity,
- delta temperature,
- barometric pressure, and
- solar radiation.

At the 30m level, wind speed, wind direction, sigma theta, vertical wind speed, and delta temperature are measured. At the 2m level, temperature, relative humidity, delta temperature, barometric pressure, and solar radiation are measured.

Sigma theta values for both sites are calculated from wind monitor readings. Wind gusts are measured at both of the sites. The measurement indicates the speed of the gust based on a 3-second average of the wind speed, along with the gust direction and time of the gust.

Data recovery was calculated for each parameter at both of the meteorological sites. For 100 percent data completeness each parameter would have 2208 hourly values. As shown in Table 2, data completeness at Site #1 was 99.7 percent for all parameters, except for evaporation, which had data recovery of 90.2 percent, and precipitation which had data recovery of 99.6 percent. Data completeness for evaporation data were calculated only for the month of October, due to the seasonal schedule for collecting these data. The evaporation pan was taken offline on November 12, 2008 and will be stored until the next operational season. There were three freezing events noted by the operator where at least half of the evaporation pan had a thin layer of ice present. However, there are other episodes, which were not noted by the site operator, but appear from further review of both evaporation and temperature data to be events during which the evaporation pan experienced freezing. As discussed on the following page, the data completeness for precipitation will be computed after further evaluation of the data. Data recovery at Site #2, also shown in Table 2, was 99.8 percent for all parameters, except 2m temperature which had 99.7 percent completeness, and 30m temperature and Delta Temperature which had 99.6 percent data completeness.

Table 2 – Data Recovery for Meteorological Parameters

Meteorological Parameter	Data Recovery Site #1	Data Recovery Site #2
Wind Speed	99.7%	99.8%
Wind Direction	99.7%	99.8%
Sigma Theta Wind	99.7%	99.8%
Vertical Wind Speed EPS Avg	99.7%	99.8%
Vertical Wind Speed EPS Std	99.7%	99.8%
Vertical Wind Speed CFT Avg	99.7%	99.8%
Vertical Wind Speed CFT Std	99.7%	99.8%
2m Temperature	99.7%	99.7%
10m Temperature	99.7%	N/A
30m Temperature	N/A	99.6%
DeltaT Avg	99.7%	99.6%
Precipitation Total*	99.6%	N/A
Relative Humidity Avg	99.7%	99.8%
RH Temperature Avg	99.7%	99.8%
Barometric Pressure	99.7%	99.8%
Solar Radiation Avg	99.7%	99.8%
Evaporation Level Avg	90.2%	N/A
Gust Speed	99.7%	99.8%
Gust Direction	99.7%	99.8%
Gust Time	99.7%	99.8%

* Precipitation data are suspect, see Section 3.1

All required parameters at both sites meet the required 90 percent data recovery. However, there were operational issues with the precipitation gauge at Site #1 which cause some of the data collected during the fourth quarter 2008 to be suspect. Prior to the fourth quarter 2008 calibration, performed on October 8, 2008, a verification was run on the precipitation gauge and the gauge failed this verification. The precipitation gauge was subsequently calibrated and passed a third party audit. Table 3 summarizes precipitation data collected between April 1, 2008 and December 31, 2008 at the Energy Fuels Resources Corporation (EFR) meteorology Site #1 and the Nucla, CO Remote Automated Weather Station (RAWS) site, and data collected from April 1 through November 30, 2008 for the four EFR surface water sites. Data are included in this table if one of the six sites recorded measurable precipitation. Data for the four EFR surface water sites were averaged for this comparison. As can be seen by comparing these measurements, precipitation events can be highly variable; thus further evaluation of the precipitation data from these sites will be conducted after a full year of data have been collected.

Precipitation measurements are continuously collected at the EFR meteorology Site #1 and at the Nucla RAWS site and hourly totals are used for calculating the daily total. The daily total for these two sites is calculated using measurements from midnight to midnight. Data for the manual gauges at the EFR surface water sites is gathered if operators have reason to believe precipitation has occurred; therefore precipitation events recorded at these manual gauges can be recorded on the day of or the day following an event. For example, the precipitation event captured on October 11, 2008 by the two real time gauges (meteorology Site #1 and Nucla RAWS site), was recorded on October 12 for the surface water sites. Precipitation events can be over/under estimated for the surface water sites depending on when the precipitation occurred, the time of day the measurement was taken, and if precipitation was falling at the time of the measurement. For example, if precipitation fell in the night, the real time gauges would record the measurements for the hours precipitation fell, and if precipitation fell after midnight that event would be recorded for the following day. The manual gauge would be recorded as one measurement and recorded on the day of the site visit.

As can be seen in Table 3, the precipitation gauge at meteorology Site #1 measured precipitation events. However, due to the verification failure, and the difference in measurements seen between the Site #1 gauge, the Nucla RAWS, and EFR surface water sites, the precipitation data will undergo further evaluation to determine which data are valid and which are not. Precipitation data are being collected at meteorology site #1 by EFR for support of designing the evaporation ponds for the proposed mill. The evaporation pond for the mill has already been designed for the 100-year event, thus the suspect precipitation data should not be considered a shortfall for 90 percent data completeness for meteorological parameter requirements.

Table 3 – Precipitation Measurements

	EFR Site #1	Nucla RAWS Site	EFR Surface Water Sites
	Total Daily Precip (inches)	Total Daily Precip (inches)	Average Precip (from 4 sites) (inches)
4/9/2008	0.06	0.55	
4/10/2008	0.03	0.27	
4/11/2008	0.01	0	
5/7/2008	0.01	0.08	
5/8/2008	0	0	0.10
5/12/2008	0.2	0.26	
5/13/2008	0	0.4	0.50
5/21/2008	0.02	0.23	
5/23/2008	0.01	0	
5/24/2008	0.02	0.01	0.01
6/3/2008	0.02	0	
6/4/2008	0.01	0.01	
6/5/2008	0	0.32	0.45
6/6/2008	0.02	0	
6/23/2008	0	0.01	
6/26/2008	0	0.01	
6/30/2008	0	0.02	
7/5/2008	0	0.01	
7/6/2008	0	0.02	
7/7/2008	0	0.05	
7/8/2008	0.01	0	0.01
7/11/2008	0.13	0	
7/16/2008	0	0.26	

	EFR Site #1	Nucla RAWs Site	EFR Surface Water Sites
7/17/2008	0.01	0.03	0.15
7/20/2008	0	0.02	
7/22/2008	0	0.21	
7/23/2008	0	0	0.04
7/24/2008	0.1	0	
8/4/2008	0	0.01	
8/5/2008	0.02	0.14	0.04
8/6/2008	0	0.43	
8/7/2008	0.09	0.56	0.50
8/8/2008	0	0.01	
8/25/2008	0.01	0.1	
8/26/2008	0	0	0.20
8/31/2008	0	0.12	0.10
9/1/2008	0	0	0.06
9/9/2008	0	0.02	
9/10/2008	0	0.06	0.05
9/11/2008	0.03	0.03	0.10
9/12/2008	0	0.02	
9/17/2008	0	0	0.38
9/18/2008	0	0	0.01
9/27/2008	0.03	0.04	
9/28/2008	0	0	0.48
10/4/2008	0	0.18	0.30
10/5/2008	0	0.27	
10/6/2008	0	0	0.78
10/11/2008	0.05	0.04	
10/12/2008	0	0	0.04
10/22/2008	0	0	0.04
11/2/2008	0.03	0	
11/4/2008	0.01	0.01	
11/5/2008	0	0.05	
11/10/2008	0.04	0.03	
11/11/2008	0	0	0.04
11/26/2008	0.03	0	
11/27/2008	0.89	0.65	0.35
11/28/2008	0.19	0.15	0.60
11/30/2008	0	0	0.01
12/2/2008	0.02	0.02	
12/3/2008	0	0.01	
12/8/2008	0.25	0.28	
12/9/2008	0	0.05	
12/13/2008	0.14	0	
12/14/2008	0.15	0	
12/15/2008	0.08	0	
12/16/2008	0.08	0	
12/17/2008	0.06	0.02	
12/18/2008	0.36	0.1	
12/19/2008	0	0.01	
12/22/2008	0.28	0.09	
12/23/2008	0.07	0.01	
12/24/2008	0.05	0	
12/25/2008	0.48	0.08	
12/26/2008	0.6	0.07	

	EFR Site #1	Nucla RAWs Site	EFR Surface Water Sites
12/29/2008	0	0.01	
12/30/2008	0	0.05	
12/31/2008	0	0.03	
Total	4.72	6.52	5.31
* Highlighted values were recorded as "trace" and assumed to be 0.01" for calculations			

3.2. PM₁₀ Data

PM₁₀ data were collected at two of the five monitoring sites (Site 1 and Site 2) following the EPA Ambient Particulate Monitoring Sample Day Schedule for 1-in-6 day sampling.

Daily, weekly, and monthly checks were performed on the Partisol PM₁₀ monitors at each site according to standard operating procedures (SOPs) presented in the Energy Fuels Resources Corporation Uranium Mill Licensing Support Ambient Air Monitoring Plan Piñon Ridge Mill Site, 2008.

Data completeness (Table 4) was calculated for each site and both sites had 100 percent data recovery, exceeding the 75 percent requirement for data recovery.

Table 4 – Data Recovery for PM₁₀ Samples

PM₁₀	Site 1	Site 2
Total # Samples per Quarter	15	15
# of Samples Collected	15	15
% Completeness	100.0	100.0

3.3. Radionuclide Data

Filters for radionuclide data analysis were collected at each of the five monitoring sites (Sites #1, #2, #3, #4, and #5). Hi-Vol monitors were run continuously on a 14-day filter exchange schedule. Site 3 had the lowest percentage of data collection at 98.7 percent due to downtime for generator service, maintenance, and operational issues (Table 5).

Daily, weekly, and monthly checks were performed on the Tisch Hi-Vol monitors at each site according to standard operating procedures (SOPs) presented in the Energy Fuels Resources Corporation Uranium Mill Licensing Support Ambient Air Monitoring Plan Piñon Ridge Mill Site, 2008.

Table 5 – Data Recovery for Radionuclide Samples

Radionuclide	Site 1	Site 2	Site 3	Site 4	Site 5
Total Run Time (hrs)	2208.0	2209.1	2210.7	2214.2	2216.4
Actual Run Time (hrs)	2204.0	2205.7	2182.2	2212.1	2214.3
Data Recovery	99.8%	99.8%	98.7%	99.9%	99.9%

4.0 METEOROLOGICAL DATA ANALYSIS

The monthly averages of meteorological parameters are summarized in Table 6.

Table 6 – Monthly Average Meteorological Parameters

Meteorological Parameter	October		November		December	
	Site #1	Site #2	Site #1	Site #2	Site #1	Site #2
Wind Speed (m/s)	2.68	2.42	1.94	1.67	2.33	2.25
Wind Direction (deg)	184.78	242.85	184.66	246.04	206.96	243.03
Sigma Theta Wind	27.85	30.38	29.99	30.40	28.99	29.99
Vertical Wind Speed EPS (cm/s)	2.19	4.93	1.25	4.10	1.56	4.55
Vertical Wind Speed EPS Std	20.00	33.63	13.74	22.69	16.36	29.58
Vertical Wind Speed CFT (cm/s)	7.04	10.19	3.59	8.45	7.11	12.54
Vertical Wind Speed CFT Std	20.66	37.53	13.55	24.45	16.83	33.68
2m Temperature (°C)	10.77	11.45	4.55	5.40	-2.39	-1.89
10m Temperature (°C)	11.56	N/A	5.54	N/A	-1.65	N/A
30m Temperature (°C)	N/A	12.42	N/A	6.54	N/A	-1.06
DeltaT	0.79	0.98	0.98	1.14	0.74	0.83
Relative Humidity (%)	37.24	34.66	50.48	47.69	70.47	67.34
RH Temperature (°F)	51.73	53.53	40.98	42.63	28.51	29.53
Barometric Pressure (inHg)	24.72	24.65	24.70	24.63	24.59	24.51
Solar Radiation (W/m²)	173.97	175.46	125.49	121.73	96.53	91.25

	October		November		December	
Gust Speed (m/s)	5.77	5.52	4.08	3.94	5.02	5.14
Gust Direction (deg)	170.05	249.88	158.81	262.32	212.02	247.59
Total Precipitation* (in)	0.13	N/A	1.19	N/A	2.62	N/A
Total Evaporation (in)	3.89	N/A	N/A	N/A	N/A	N/A
Average Daily Evaporation (in)	0.13	N/A	N/A	N/A	N/A	N/A

* Some precipitation data are suspect, see Section 3.1

The wind roses for Sites 1 and 2 are shown in Figures 3 and 4 respectively. These wind roses should be considered as draft, because in order to create the wind roses, data underwent processing using the EPA AERMET software and the processed data have not gone through the final quality assurance process, which will occur after a full year of data have been collected.

As can be seen in Figure 3, the wind direction at the 10 m tower site (Site 1) is predominantly from the southeast, with a less frequent, yet still prominent northwest component. The southeast/northwest wind directions depict the down-valley/up-valley flow through the area. The wind direction at the 30m tower site (Site 2) wind rose (Figure 4) is predominantly from the northwest.

Figure 3 – Site 1: 10m Wind Rose

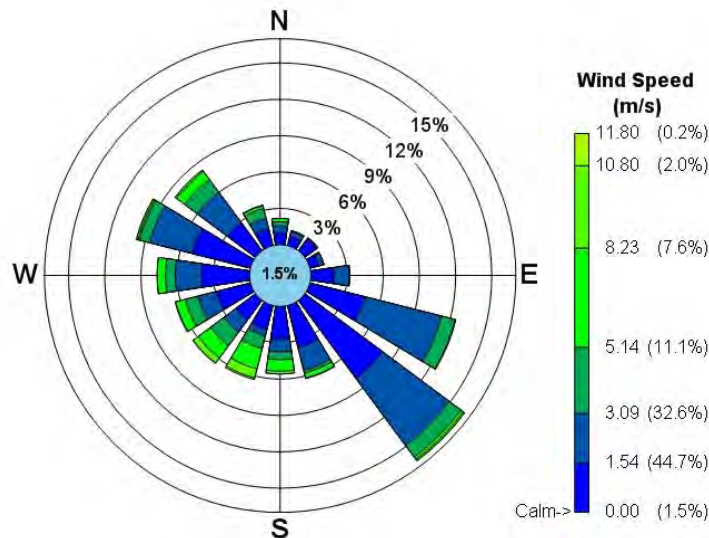
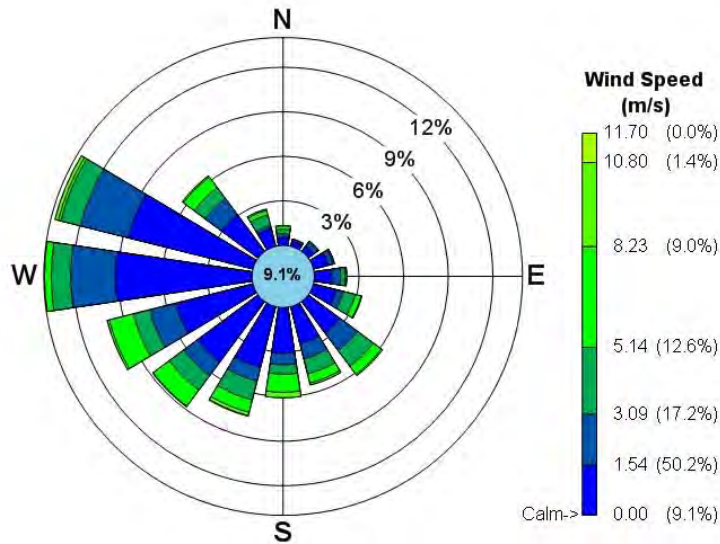


Figure 4 – Site 2: 30m Wind Rose



5.0 QUALITY ASSURANCE PROGRAM

5.1. Quarterly Calibrations

Calibrations were performed on particulate matter equipment on October 8, 2008 by Inter-Mountain Laboratories. A copy of the calibration report is included in Appendix D.

5.2. Independent Quarterly Audit Program

Independent auditing on meteorological and particulate matter equipment was performed by VSI on October 8, 2008. A copy of the audit report from VSI is included in Appendix E.

Acceptable audit performance limits can be found in the Energy Fuels Resources Corporation Uranium Mill Licensing Support Ambient Air Monitoring Plan Piñon Ridge Mill Site, 2008.

5.3. Internal Quality Control Procedures

In the event of any operational errors or missed sampling events, a corrective action procedure will be implemented. The monitoring project manager for the site, as well as the monitoring project manager for Kleinfelder, will investigate the cause and effect of the incident, take corrective action, and prepare a letter to the CDPHE Air Pollution Control Division (APCD) and the Radiation Management Unit (RMU).

6.0 PERSONNEL

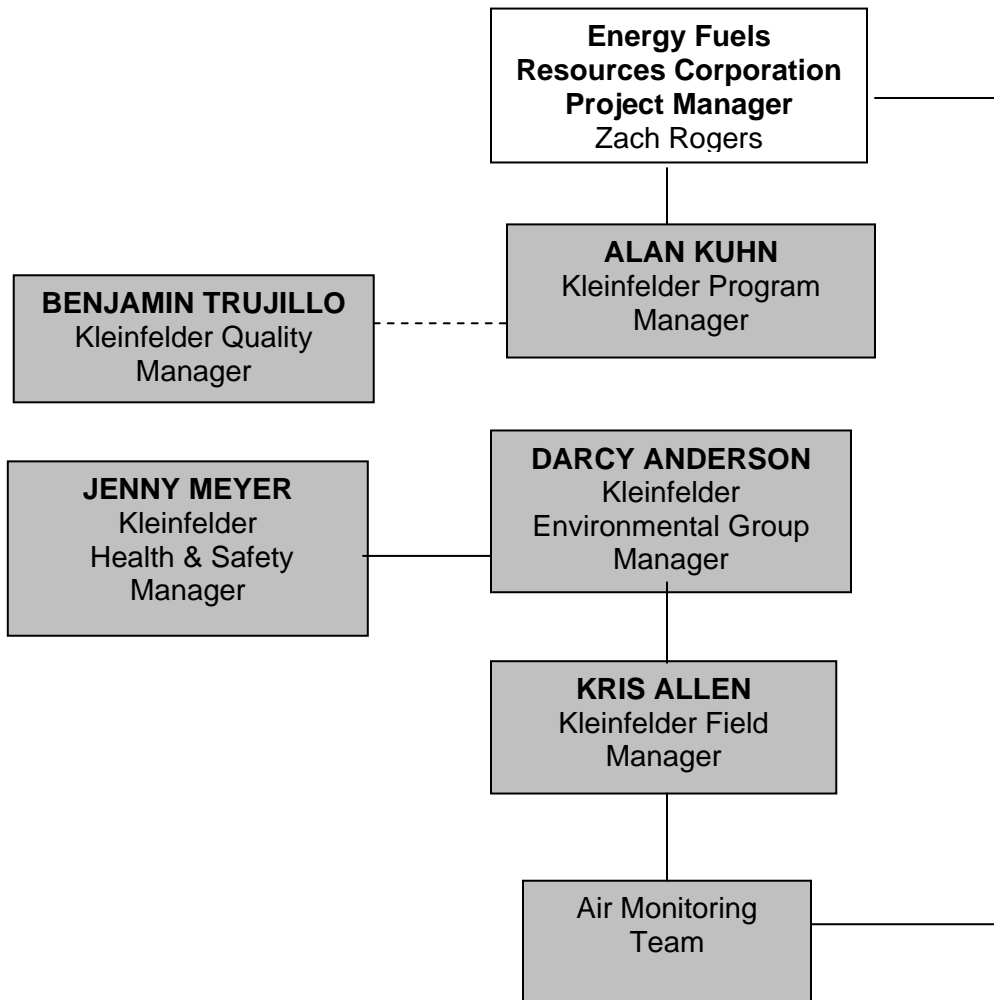
6.1. Project Staff

Kleinfelder's project staff and their respective roles are detailed in Table 7. The overall project organization is shown schematically in Figure 5.

Program management, administration, and quality assurance oversight will be conducted out of Kleinfelder's regional office located in Albuquerque, New Mexico. The Field Manager (FM) will provide onsite oversight and will assist the field team with technical, operational, or other project-related issues.

6.2. Organization Chart

Figure 5 - Project Organization Chart



6.3. Division of Responsibilities

Table 7 – Roles and Responsibilities

Name	Project Role	Responsibilities	Experience
Alan Kuhn	Program Manager	Program Management Controls, Client Interaction	Engineering, Licensing, Operations Management
Benjamin Trujillo	Quality Manager	Quality Assurance	Quality Assurance, Quality Control
Jenny Meyer, CIH	Health and Safety Manager	Kleinfelder Health & Safety Plan and Compliance	Industrial Hygiene. Field Investigations
Darcy Anderson	Environmental Group Manager	Project Technical Oversight	Environmental Sciences, Project Management
Thomas Lavery	Senior Technical Staff	Technical Reviewer	Environmental Sciences
Kris Allen	Field Project Manager/Site Safety Officer	Field Management, Ambient Air Sampling, Logistical Coordinator	Air Quality, Field Management, Meteorology
Sarah Walters	Technical Staff	Ambient Air and Meteorological Data Collection	Air Quality, Meteorology
EFR	Field Staff	Sampling	Field Work, Environmental Science, Health and Safety

7.0 LIMITATIONS

Kleinfelder prepared this report in accordance with generally accepted standards of care that exist in Colorado at this time. This report may be used only by Energy Fuels Resources Corporation and only for the purposes stated. All information gathered by Kleinfelder is considered confidential and will be released only upon written authorization by Energy Fuels Resources Corporation or as required by law. Non-compliance with these requirements by Energy Fuels Resources Corporation or anyone else, unless specifically agreed to in advance by Kleinfelder in writing, will release Kleinfelder from any liability resulting from the use of this report by any unauthorized party and Energy Fuels Resources Corporation agrees to defend, indemnify, and hold harmless Kleinfelder from any claim or liability associated with such unauthorized use or non-compliance.

8.0 STANDARDS AND REFERENCES

Energy Fuels Resources Corporation Uranium Mill Licensing Support Ambient Air Monitoring Plan Piñon Ridge Mill Site, 2008.

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