SHEEP MOUNTAIN URANIUM PROJECT **CROOKS GAP, WYOMING**



US EPA Project Meeting April 7, 2011

TSX.V - TUE FRANKFURT - T4X



Introductions Greg Adams – VP Development Doug Beahm – BRS Engineering Toby Wright – Wright Env. Services



<u>AGENDA</u>

Introductions

- Greg Adams/Titan Uranium, VP Development
- Deborah Lebow-Aal/EPA Region 8 Air Program

Introduction to Titan Uranium USA Project Overview:

- Doug Beahm/BRS Engineering
- Toby Wright/Wright Env. Services

Issues for Discussion

TSX-V: TUE

- Status of 40 CFR 192 GW standards update
- Status of Active Heaps & Inactive Heaps
- Status of Process Ponds & Waste Storage Tanks

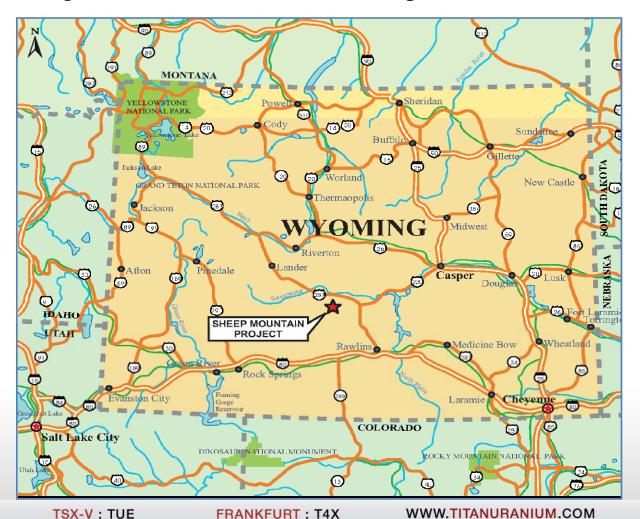


PROJECT OVERVIEW

- Location
- Project Scope
 - Mining
 - Milling



Sheep Mountain Project Location





PROJECT OVERVIEW

- Site Location
 - Fremont , Wyoming
 - Existing Uranium Mine Permit 381C
- Historical Operation
 - Western Nuclear Crooks Gap Project
 - •Mined 1956 1988, processed at Split Rock Mill
 - US Energy
 - •1988 Sheep Mountain Underground
 - •Partial reclamation since 1988, no new operation







Titan Sheep Mountain Project:

- Mine
 - Underground and Open Pit Mining
 - Current Mine Permit (381C)
 - Updating POO, Reclamation Plan & Bond
- Uranium Recovery
 - Heap Leach with Central Processing Plant
 - Within existing WDEQ Mine Permit (381C)

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Project Scope:

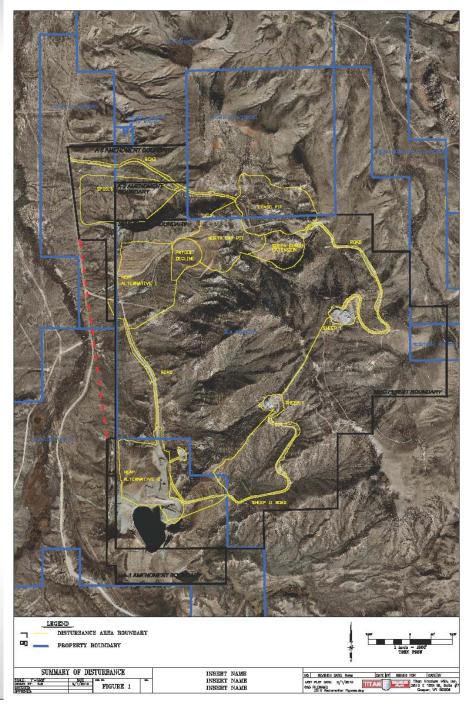
- Mine
 - •15 Year Mine Lifecycle, may be extended
 - Congo Pit Area
 - Mine waste trucked to South and West waste piles
 - •All mine waste to be returned to pit or used in reclamation
 - Sheep Mountain Underground
 - To extent possible all wastes reclaimed in old mine workings
 - Ore transported to the heap from underground via conveyors



Project Scope:

- •Mill
 - 15 year operational lifecycle, may be extended
 - Heap Leach Pads
 - •Double lined pads with leak detection, clay underliner
 - •Five 16 acre cells planned (approx. 80 acre footprint)
 - Up to 50 ft lifts being evaluated
 - Sulfuric acid lixiviant
 - •Double lined process ponds with leak detection, clay underliner
 - Barren/Pregnant
 - Liquid waste in evaporation ponds
 - Central Processing Plant
 - Solvent Extraction with IX Polishing
 - Vacuum Driers
 - Final Product is drummed yellow cake

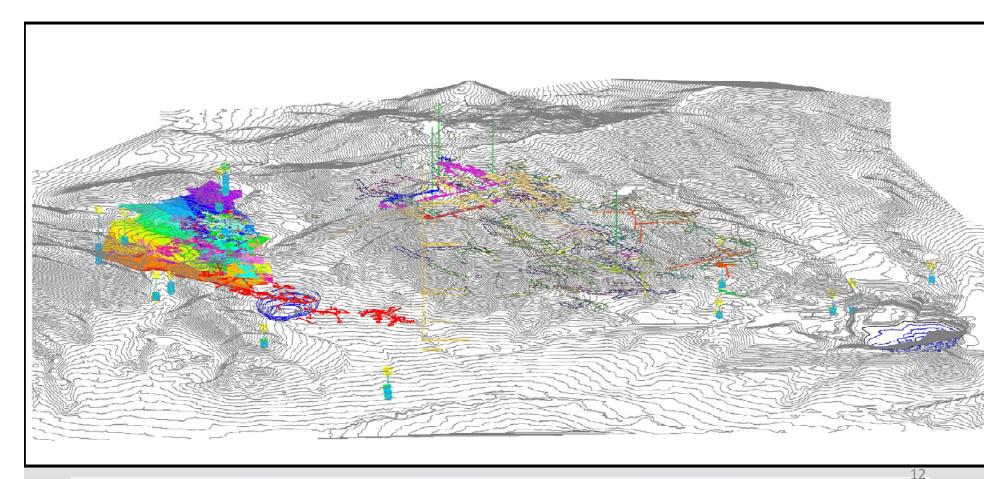
FRANKFURT: T4X



- Existing Mine Permit 381C
 - •3,625 acres total area
- Proposed Disturbance (667 acres)
 - Mine: 457 acres (258 Disturbed)
 - Congo/North Gap Pits
 - Sheep Mtn. Underground
 - Waste Rock/Topsoil Storage
 - Buildings & Infrastructure
 - •All proposed mine disturbance on previously disturbed land
 - <u>Licensed Area:</u> 210 acres (161 Disturbed)
 - Heap Leach Pads
 - Process/Waste Ponds
 - Central Processing Plant



3D View Mining and Monitor Wells





Status of Baseline Studies



Pre-Operational Baseline Studies Status

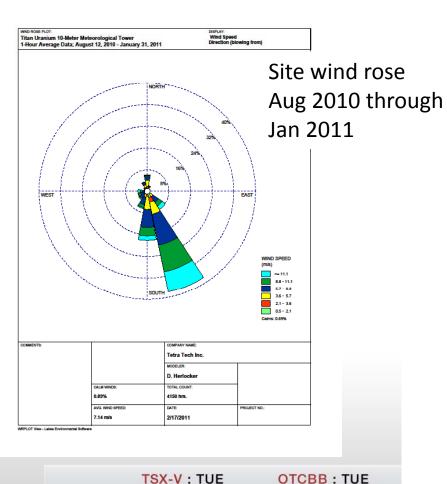
- Cultural Resources
- Wildlife
- Vegetation & Soils
- Surface Water
- Groundwater
- Radiological Characterization

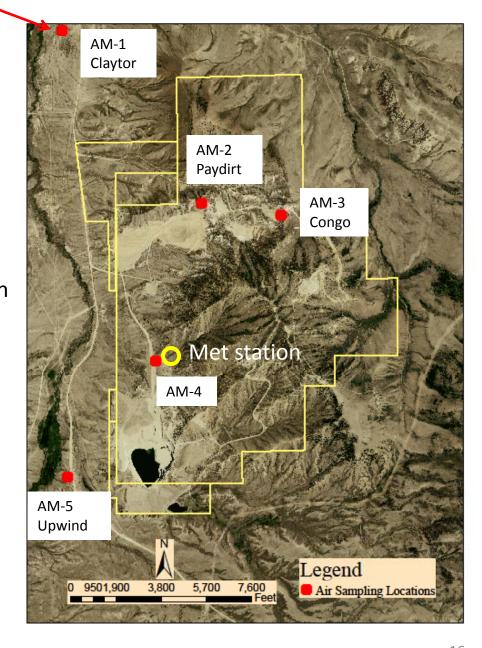


Topic Area	Status	Actions Pending	
Cultural Resources	Reviewed existing surveys	BLM Review	
	Consulted with BLM on scope of additional surveys	SHPO Review	
	Completed additional surveys	Incorporate results into ER	
	Submitted findings to BLM		
Wild Life	Raptor surveys complete	Incorporate results into ER	
	Songbird surveys complete		
	Waterfowl surveys complete		
	Small mammal surveys complete		
Vegetation	Vegetation surveys complete	Incorporate results into ER	
	No T&E Species present		
	One BLM sensitive species found		
	o Limber Pine		
	 No impacted by proposed disturbance 		
	Completed 3 rounds of veg. sampling as per Reg Guide 4.14		
Soils & Sediment	• Collected soil samples as per Reg. Guide 4.14 (surface & subsurface)	Incorporate results into ER	
	Collected sediment samples as per Reg. Guide 4.14 @ SW sampling		
	locations		
Surface Water	Quarterly SW flow measurements	Data analysis	
	Monthly flowing SW quality sampling	 Incorporate results into ER 	
	Quarterly Pit Lake quality sampling		
Groundwater	Quarterly Sampling	Data analysis	
	Reg. Guide 4.14 and WDEQ parameters	Incorporate results into ER	
Meteorological	Continuous data since July 2010	MILDOSE Modeling	
	2 m & 10 m instrumentation	 Update with 4 quarters of data 	
	Instrumentation meets most Reg. Guide 3.36 requirements		
Air Quality	Quarterly sampling from 5 locations since July 2010	Data analysis	
	All parameters and reporting limits as per Reg. Guide 4.14	Incorporate results into ER	
Socio\Env. Justice	Ongoing	Complete analysis	
		• Incorporate results into ER 15	

Air sampler locations:

Additional monitoring locations once radiation control boundary location is finalized







Groundwater Hydrogeology

- Historical Conceptual model
 - Battle Spring Fm. host upper most aquifer
 - •Fine to coarse grained sandstone with discontinuous siltstone and claystone lenses
 - Unconfined aquifer
 - Recharge from north
 - Regional discharge to south
- New Studies Ongoing
 - Sampling existing wells in place since 1988
 - Replacing historical wells abandoned in 2001
 - Evaluating aquifer properties



Status of NRC/BLM/State **Permit Applications & NEPA**



Coordinating Permitting & Licensing

- •NRC & BLM will develop separate EIS Documents
- Titan is planning on parallel WDEQ, BLM & NRC submittals
 - •Q3 2011
 - •WDEQ-LQD/BLM
 - •Plan of Ops, Rec. Plan & Bond Est., Env. Report
 - •NRC
 - Application with Technical Report & Env. Report
- Coordinating communications w/ NRC, BLM and WDEQ

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NRC Licensing & NEPA

- •Scope of NRC EIS Encompasses:
 - Milling: Heap Leach & Central Processing Plant
 - •Mining is a *Connected Action*
 - BLM would be a Cooperating Agency

Separate or combined NEPA processes require coordination and communication

Planning Application to NRC Submittal in Q3, 2011



BLM Permitting & NEPA

- •Scope of BLM EIS Encompasses:
 - •Mine: open pit and underground, mine dewatering, operations, reclamation
 - •Milling: Heap Leach & Central Processing Plant
 - •Includes long-term disposal of 11e.(2) byproduct material, land transfer
 - •BLM has indicated that they will reference rather than duplicate NEPA analyses for impacts addressed in the NRC NEPA process as much as possible
 - NRC would be Cooperating Agency
- Planning WDEQ\BLM Submittal in Q3, 2011

Separate or combined NEPA processes require coordination and communication



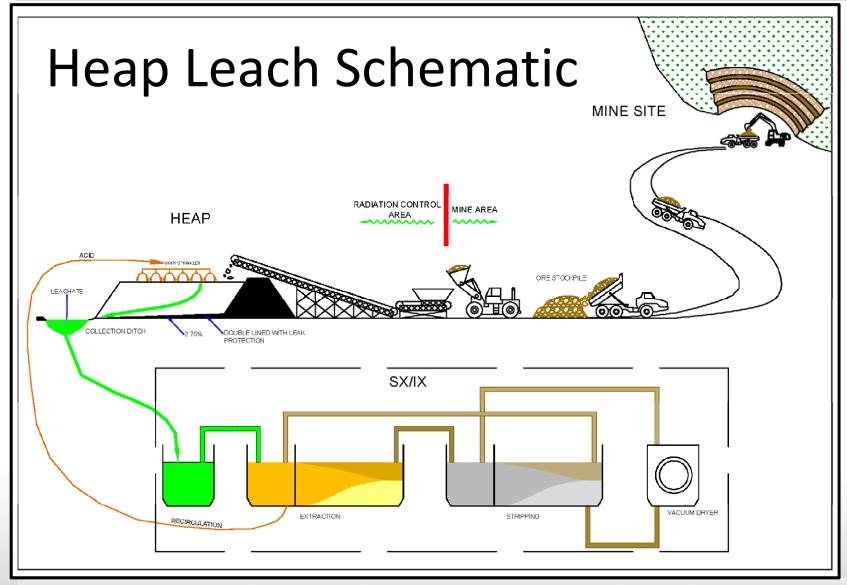
BLM Permitting & NEPA

- BLM anticipates publication in Q2 or Q3 2011
- •Titan has submitted to BLM a draft cost recovery MOU for 3rd Party NEPA Contractor
- •RFP for procurement of 3rd Party NEPA Contractor in process
 - Anticipate NEPA Contractor for bLM selection in Q2 2011



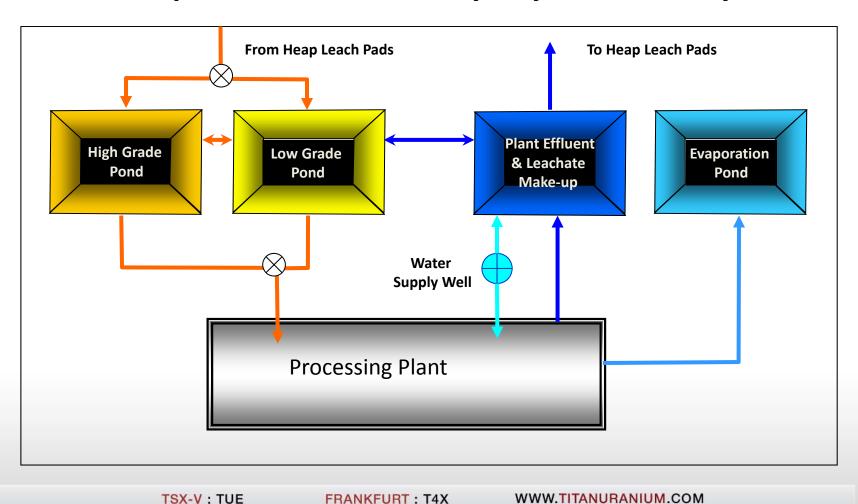
Heap Leach Process



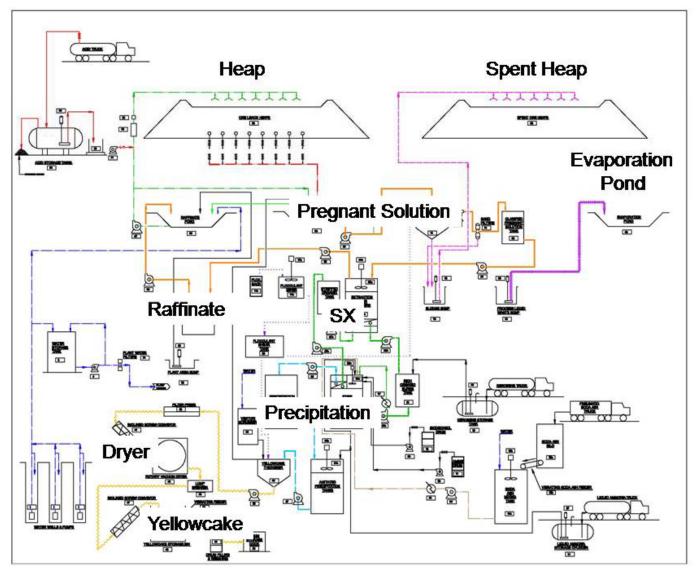




Conceptual Recovery System Layout





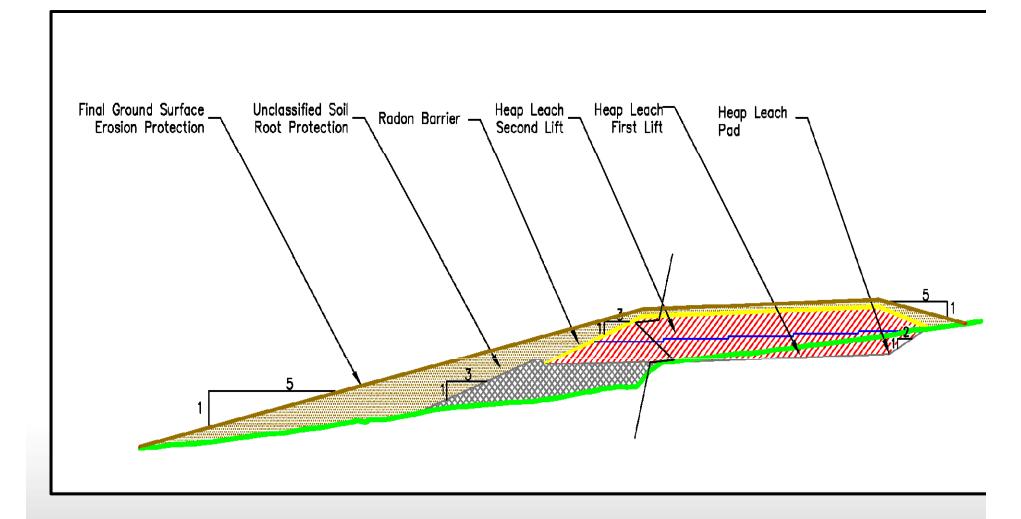




Key Points

- Active heap leach pad is part of the "mill" and the active leaching is milling
- Process Ponds are parts of the mill and will not contain any waste streams
- Milling begins with the stacking of the ore on the pad
- Milling ends when uranium recovery is complete





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Constituent	Initial Grade	Tails	Recovery	Leachate
	mg/Kg	mg/Kg		mg/L or pCi/L
Aluminum	2,920	2,810	4%	203
Arsenic	3.0	1.8	40%	1.1
Barium	10.0	10.4	-4%	0.1
Boron	4.0	3.6	10%	0.9
Cadmium	0.2	0.2	30%	0.3
Calcium	499.0	275.0	45%	445
Chromium	3.5	3.0	14%	1.1
Copper	6.0	3.4	43%	3.9
Iron	5,010	3,910	22%	498
Lead	15.0	10.9	27%	2.8
Magnesium	533	420	21%	250
Manganese	31.4	19.1	39%	10.5
Molybdenum	2.7	2.0	26%	0.0
Nickel	1.1	0.2	82%	0.8
Potassium	857	783	9%	58.0
Selenium	6.2	5.4	13%	0.0
Uranium	894	21	98%	1,047
Vanadium	4.8	3.6	25%	3
Zinc	11.3	8.6	24%	5
226Radium	237	233	2%	6,700
230Thorium	570	37	94%	587,290
210Lead	169	114	33%	29,400



Heap/ISR Comparison

•ISR

- Processing brings Formation Ground Water with elevated Radon into CPP.
- •Flow rates 3,500 7,000 gpm

•HEAP LEACH

- •98% of radium remains in the heap
- Short lixiviant residence time in heap
- Average Flow Rate @ Sheep 350 gpm
- Low radon levels expected in leachate sent to plant



Heap/Conventional Comparison

CONVENTIONAL MILLING PHYSICALLY ALTERS ORE

- Processing brings ore and associated radium into Mill
- Grinding reduces grain size
- Milling process separates sands and slimes
- •Slimes concentrate radium, retain moisture, have low strength
- •Resulting in lengthy process (decades) to stabilize and reclaim

•HEAP LEACH DOES NOT PHYSICALLY ALTER ORE

- •98% of radium remains in the Heap
- Heap remains comingled
 - •No grinding; no sand slime separation; no concentration of radium
- Built on a liner with a positive drain
- Reclamation can proceed efficiently



Mill Details

Heap & Pond Liner Details Heap Cap and Cover

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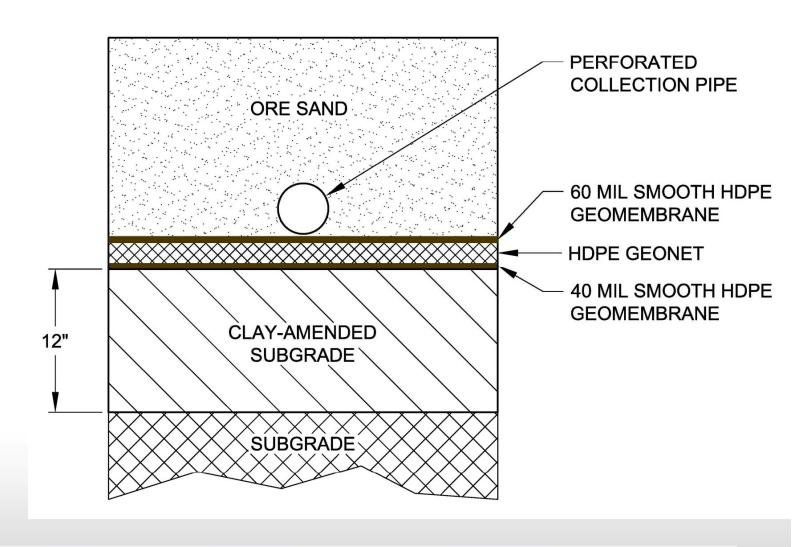
Heap Leach Facility Heap Leach Pad

- Double lined, leak detection, clay amended sub grade
- •Loading up to 2,600 tons/day, roughly 1,800 cy/day
- •25 ft lifts, maximum height 50 ft
- •200 ft wide by 1,600 ft long lifts installed via continuous stacker
- •Stacking and leaching of lifts is phased to minimize amount of uncovered spent heap (tailings)
- •Lixiviant is 1 normal H₂SO₄
 - •applied at 0.005 gpm/sq ft
- •Approx. 1.6 acres under primary leach at any one time
 - 360 gpm of leachate in process

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Heap Leach Facility (con't)

Active milling cycle includes:

- Stacking
- Primary leach
- •"Resting" heap to enhance recovery
- Secondary leach
- Rinse
- Draindown

Once active leaching and uranium recovery is complete, heap becomes *inactive* tailings

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Heap Leach Facility (con't)

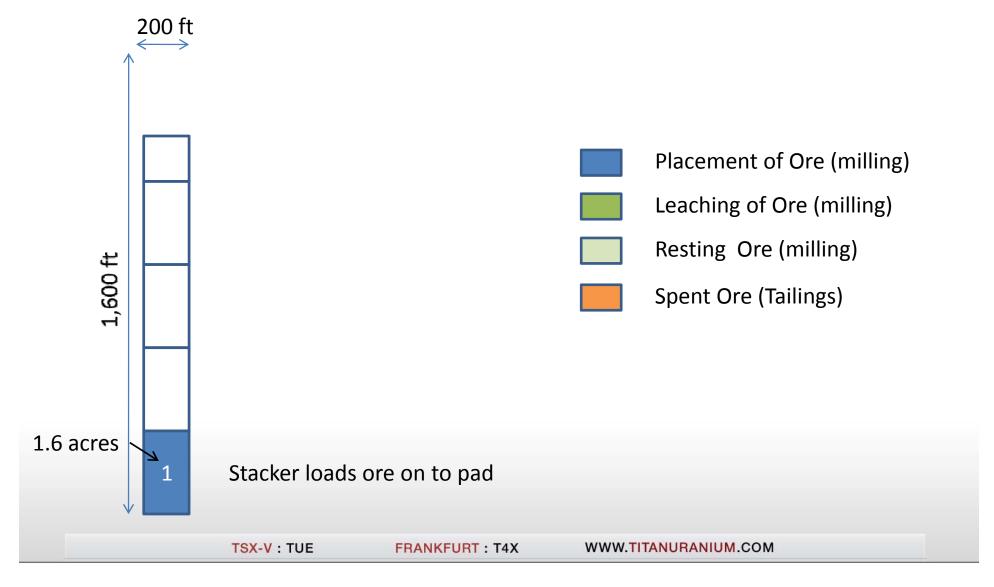
- •Up to 45 acres of heap open at any one time
 - < 40 acres would be spent heap (tailings)
- •A single heap leach pad (one continuous liner) may at any one time contain:
 - Open and unloaded pad
 - Un-leached ore
 - Ore under active leaching (milling)
 - Ore being "rested" between leach cycles (milling)
 - Ore being rinsed for final value recovery and heap detoxification (milling)
 - Spent ore (tailings) waiting to be covered
 - Spent ore (tailings) being covered
 - Covered spent ore (tailings)



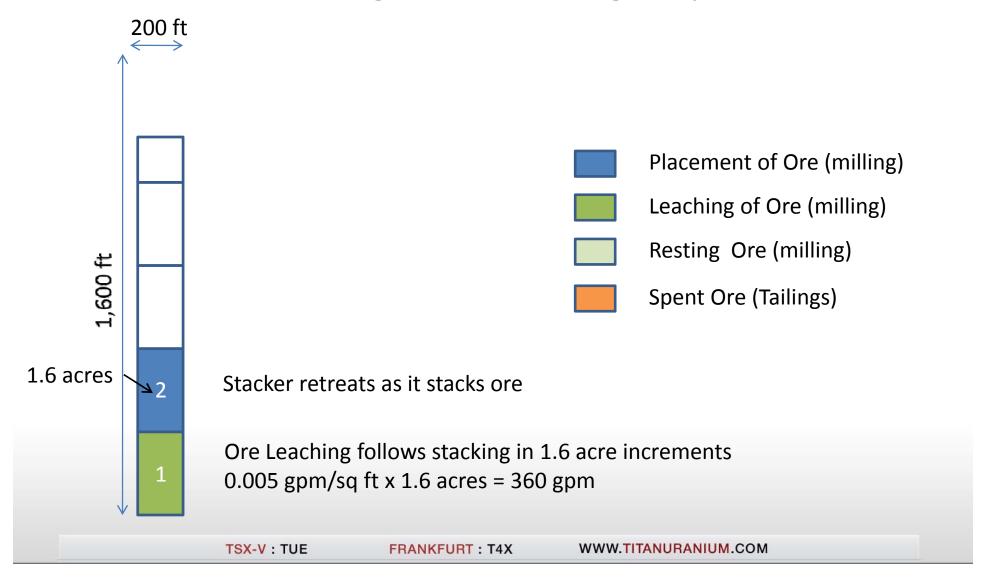
Conceptual Heap Sequencing

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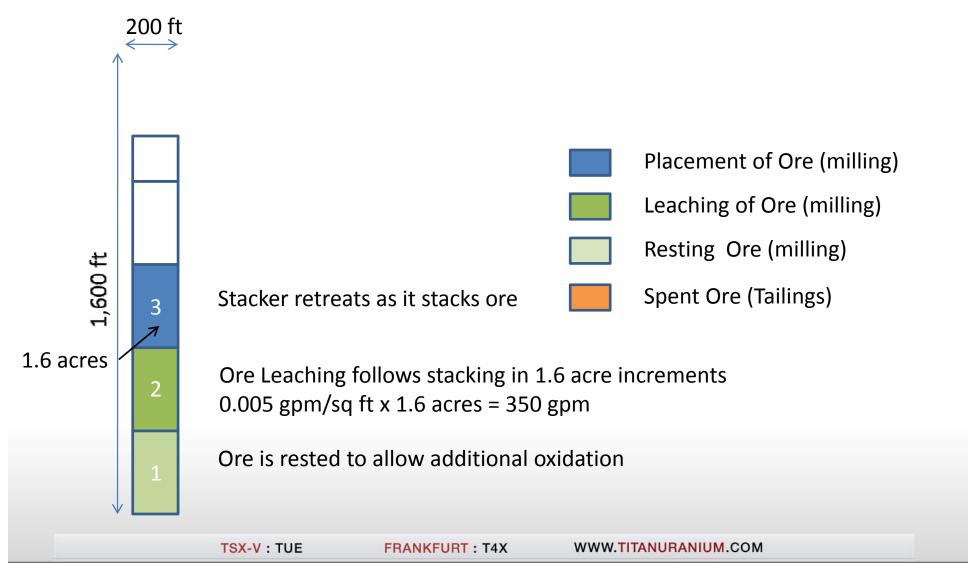




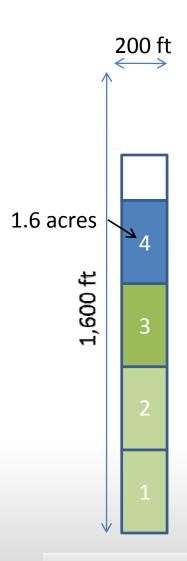




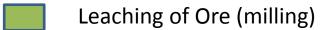


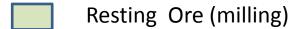










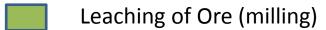


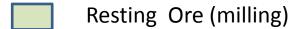










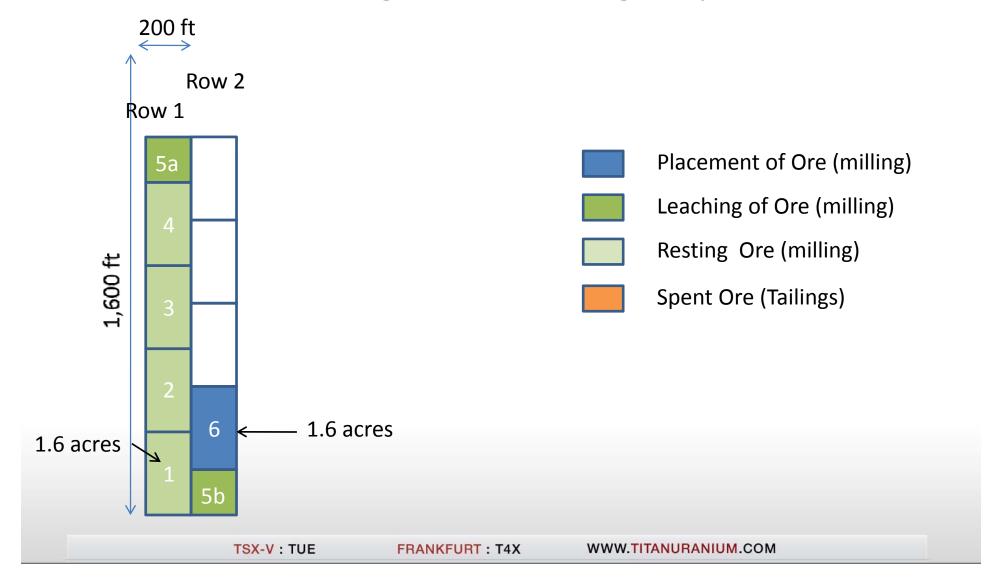




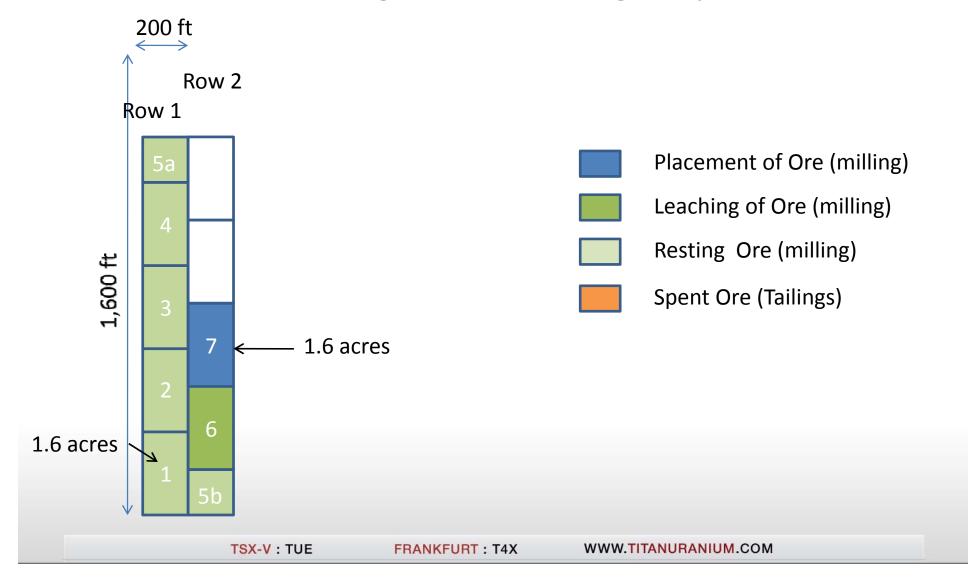


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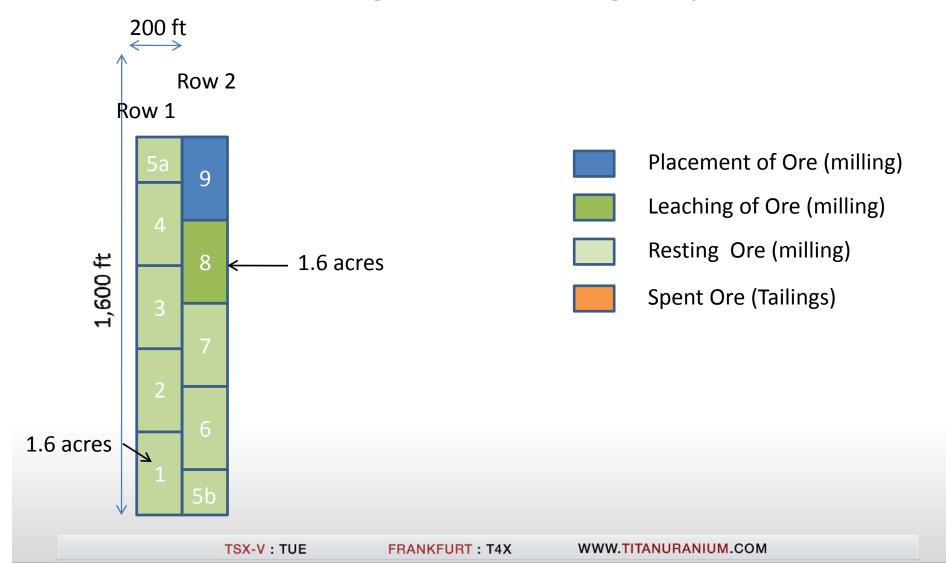




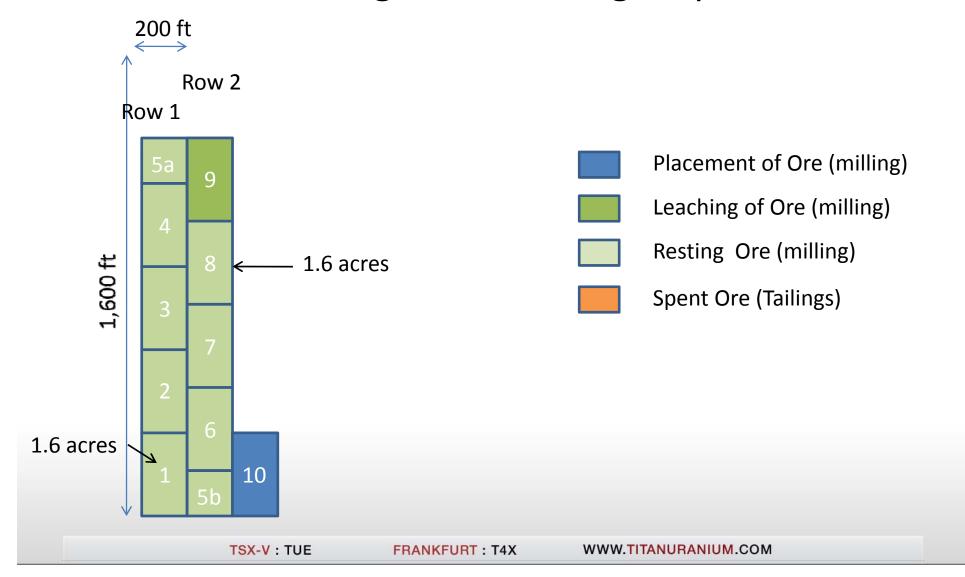




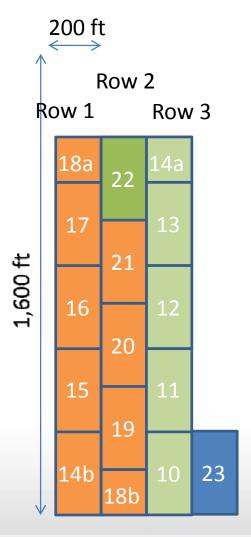






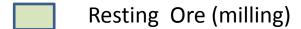






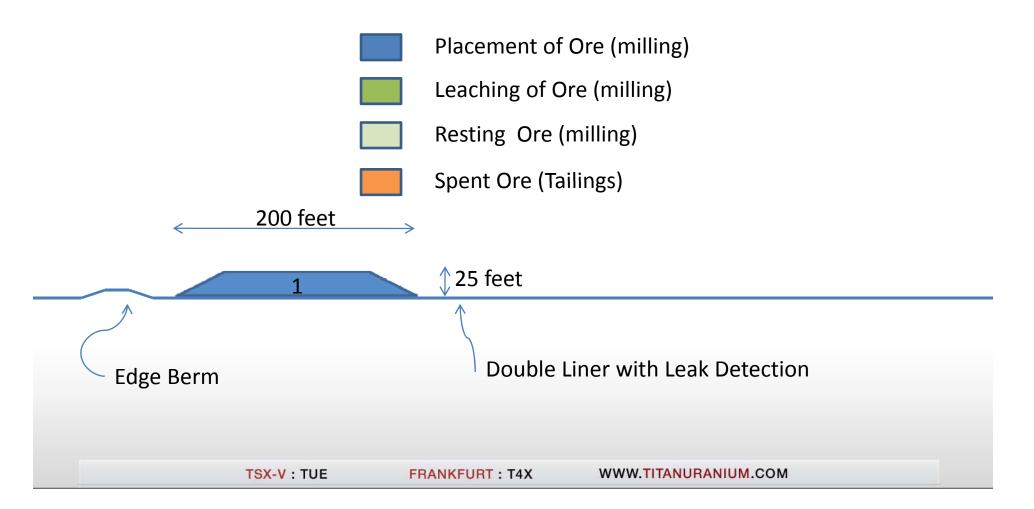














- Placement of Ore (milling)
- Leaching of Ore (milling)
- Resting Ore (milling)
- Spent Ore (Tailings)

1



- Placement of Ore (milling)
- Leaching of Ore (milling)
- Resting Ore (milling)
- Spent Ore (Tailings)

1 2 3



- Placement of Ore (milling)
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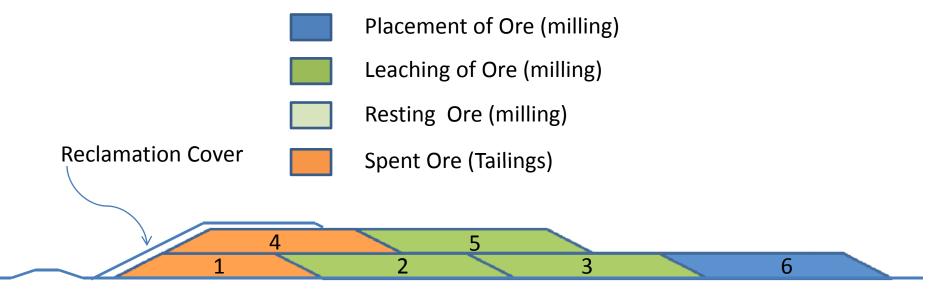
50 feet 4 1 2 3



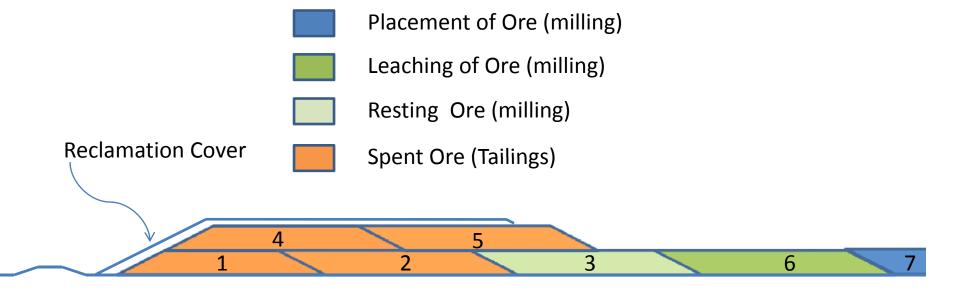
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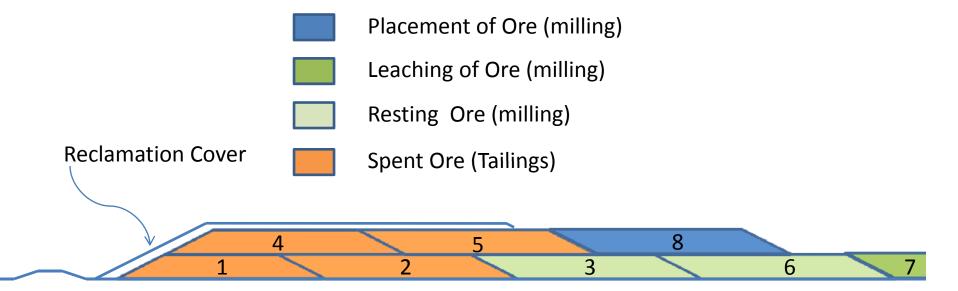




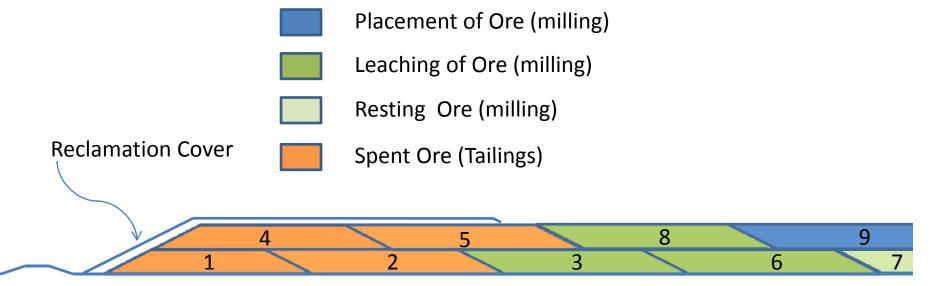




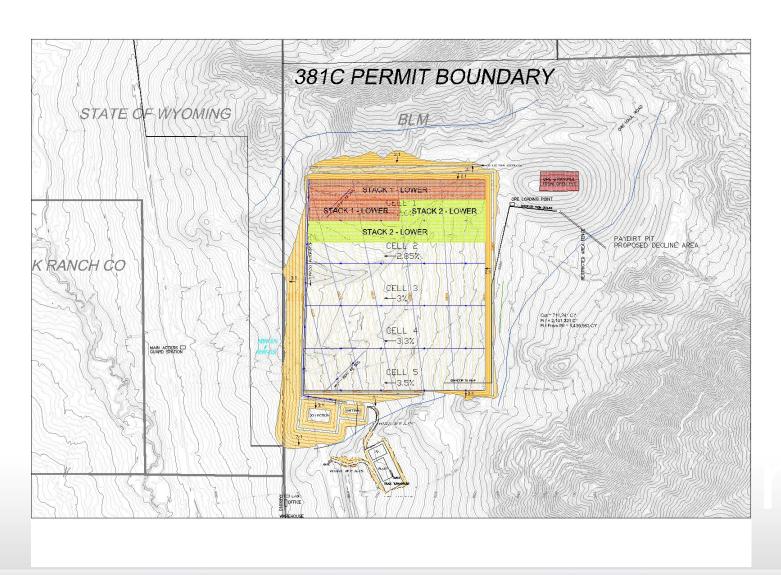




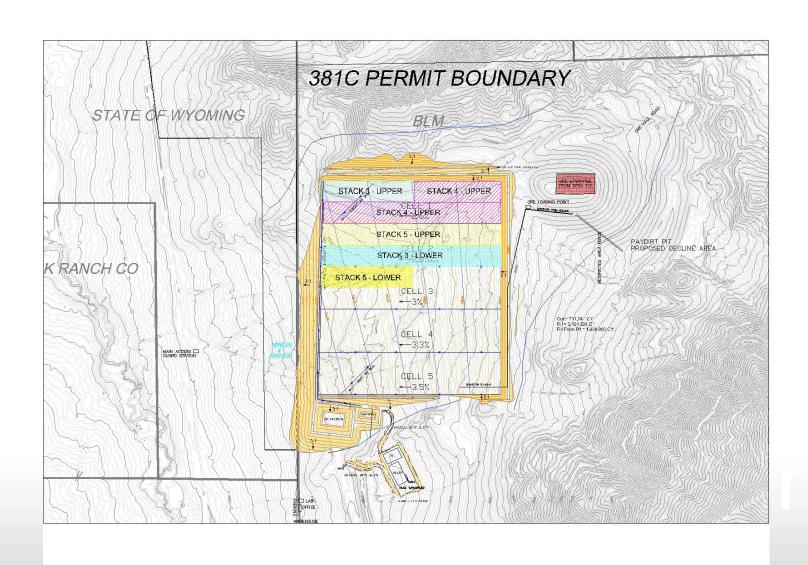




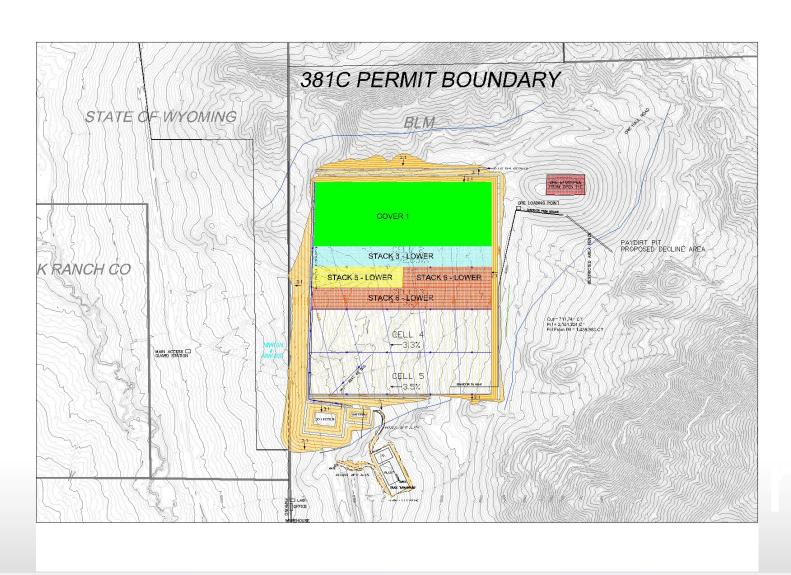




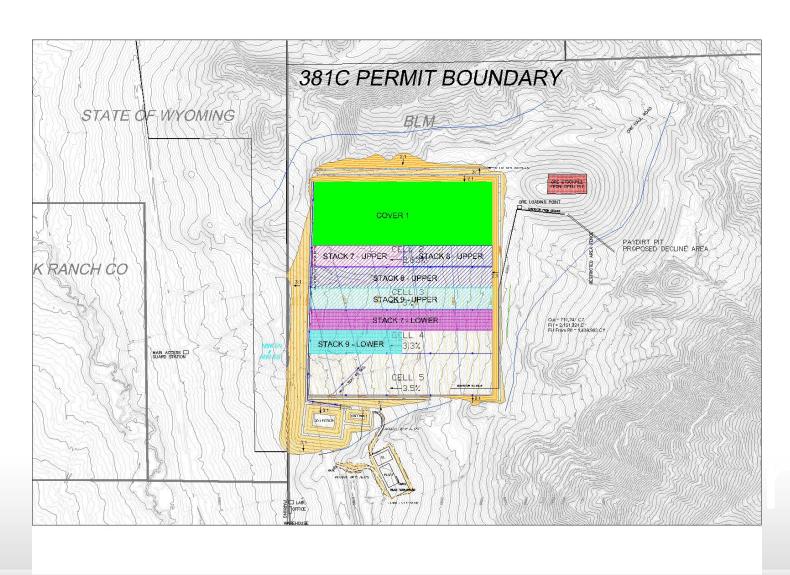




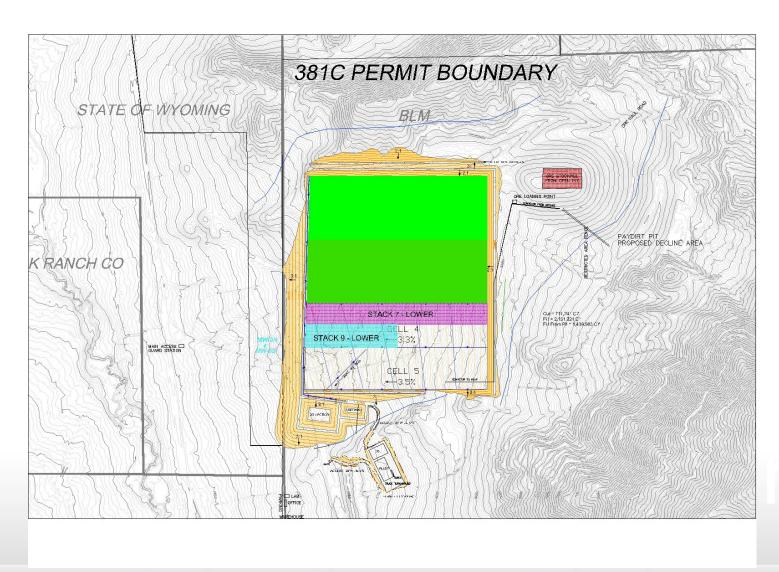




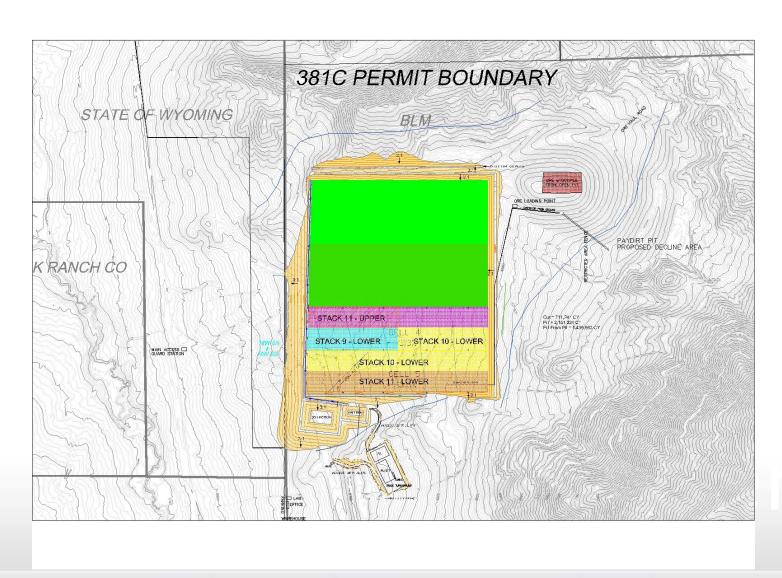




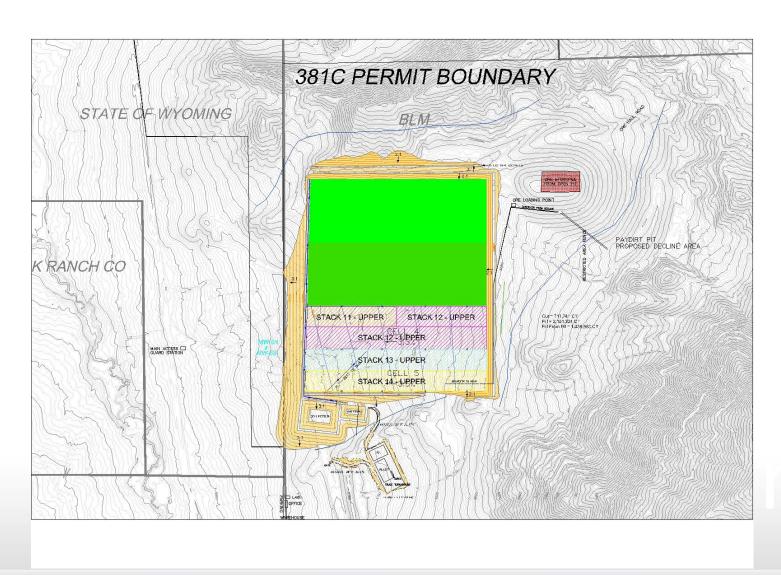










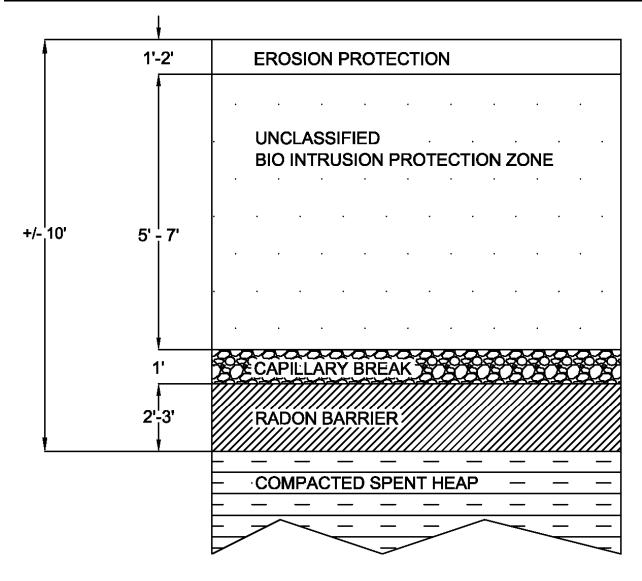




Heap Leach Facility (con't)

- •Start reclamation of spent heap surface after uranium recovery (milling) of heap section is complete on individual stacking rows:
 - Compaction and minor grading of heap surface
 - Placement of final radon barrier
 - Biointrusion layer
 - •Freeze/thaw protection
 - •Radon flux verification measurements
 - Erosion protection (rip rap)





Heap Cap and Cover Detail

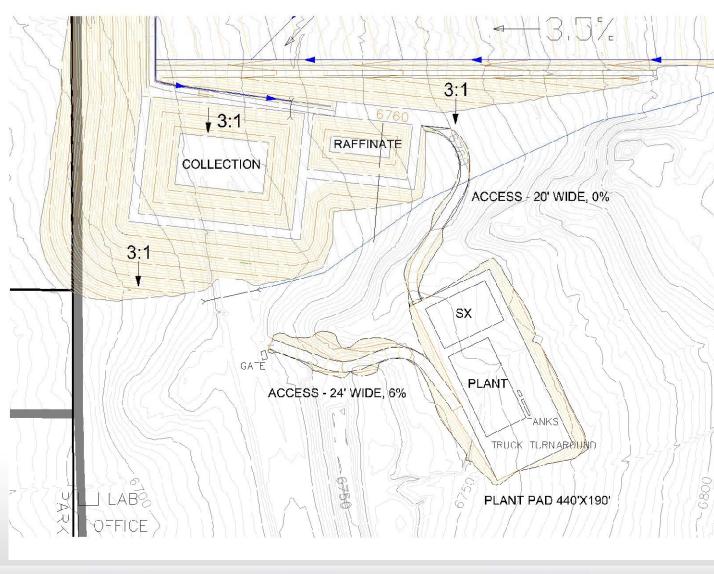


Heap Leach Facility (con't)

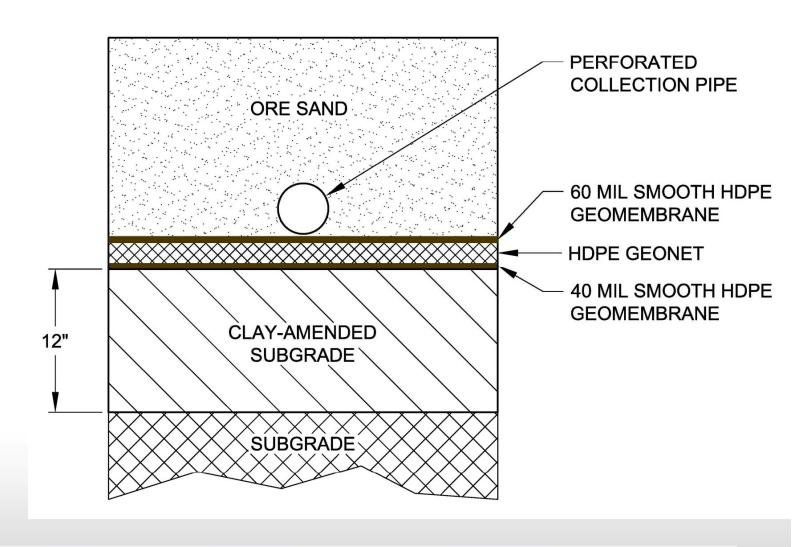
Process Ponds

- •Double lined, leak detection, clay amended sub-grade
- •Barren Pond (raffinate, lixiviant make up)
 - •acid addition
 - •make up water
- •Pregnant Pond (collection)
 - •Loaded raffinate
 - •Blending of leachates for grade control
- Analogous to mill leach process tanks
- •Will not contain any wastes or "tailings"
- •Active leach pads as well as process ponds are part of the mill, no wastes ever present
- •Only after uranium recovery is complete are tailings present

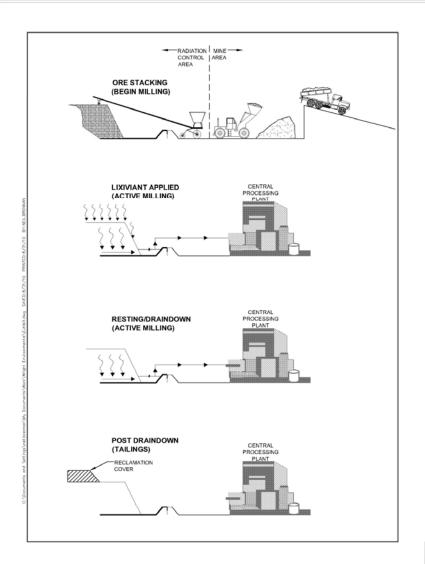












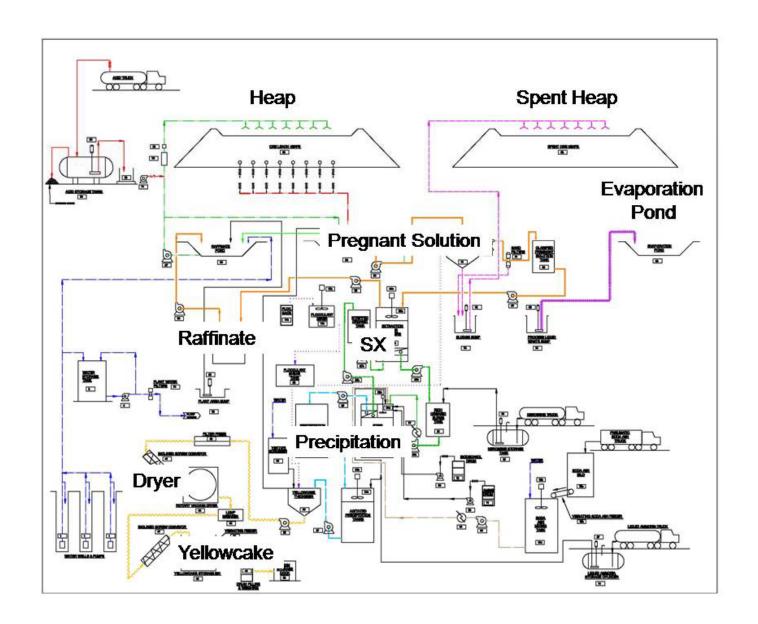
Status of Active Heaps and 10 CFR Part 61, subpart W

- Active heap is active "milling"
- Heap material during active milling is not 11e.(2) byproduct material
- •Have rad. monitoring and rad. protection programs to ensure public and occupational exposures remain ALARA
- "Resting" a heap is part of active milling
- •Heap becomes 11e.(2) when drain down and recovery of values is completed and the heap is inactive



Central Processing Plant

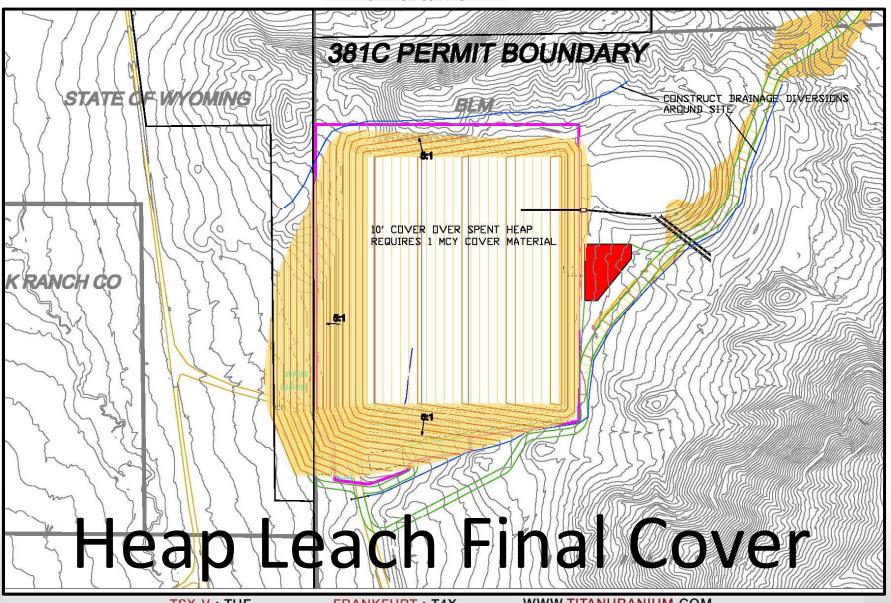
- •SX
- •IX Polishing
- Precipitation
- Vacuum Drying & Drumming
- Process Bleed to Tanks
- Operations
 - •Process flow rates approx. 360gpm,
 - •low anticipated Rn-222 levels
 - •Process bleed rates of 5% to 10%
 - •18 to 35 gpm
 - •10 gpm waste stream from precipitation circuit
 - •Liquid wastes will be managed in double lined evaporation ponds with leak detection and clay subliner





Mine and Reclamation Planning

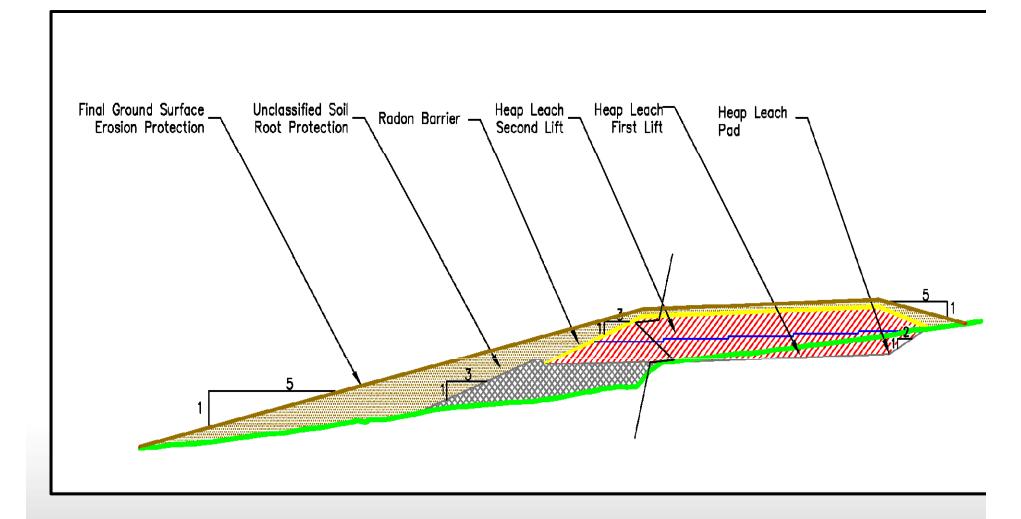




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Items for Discussion

Issues for Discussion

- Status of 40 CFR 192 GW standards update
- Status of Active Heaps & Inactive Heaps
- Status of Process Ponds
- Other?



Our Understanding

- There are no size limits on the size of active heaps
- Heap pad designs are approved solely by NRC
- Process ponds that will never contain wastes are part of the mill
- Process Pond designs are approved solely by NRC
- •Heap material only become tailings (11e.(2) byproduct material) once active uranium recovery is complete



Our Understanding (con't)

- Part 61, subpart W applies only to spent heap material (tailings)
- •We are practicing *phased disposal* of tailings
- We are allowed no more than two 40 acre cells in area of exposed tailings
- •We will have appropriate environmental monitoring and radiation programs in place to ensure compliance with 10 CFR Part 20 subpart B and subpart C requirements

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40 CFR Part 61.250 (subpart W)

- (b) <u>Continuous disposal</u> means a method of tailings management and disposal in which tailings are dewatered by mechanical methods immediately after generation. The dried tailings are then placed in trenches or other disposal areas and immediately covered to limit emissions consistent with applicable Federal standards.
- (c) <u>Dewatered</u> means to remove the water from recently produced tailings by mechanical or evaporative methods such that the water content of the tailings does not exceed 30 percent by weight.
- (e) Operational means that an impoundment is being used for the continued placement of new tailings [emphasis added] or is in standby status for such placement. An impoundment is in operation from the day that tailings are first placed in the impoundment until the day that final closure begins [emphasis added].
- (f) <u>Phased disposal</u> means a method of tailings management and disposal which uses lined impoundments which are filled and then immediately dried and covered to meet all applicable Federal standards.
- Section 101(8) of the Uranium Mill Tailings Radiation Control Act of 1978, 42 U.S.C. 7911(8).
 - "Tailings" means the remaining portion of a metal-bearing ore after some or all of such metal, such as uranium, has been extracted.