



Energy Fuels Resources (USA) Inc.
225 Union Blvd. Suite 600
Lakewood, CO, US, 80228
303 974 2140
www.energyfuels.com

August 19, 2024

VIA PDF AND EXPEDITED DELIVERY

Daniel Czecholinski, Director
Division of Air Quality
Arizona Department of Environmental Quality
Technical Services Unit
1110 West Washington Street
Phoenix, AZ 85007

**Subject: Energy Fuels Resources (USA) Inc. Pinyon Plain Mine 2024 Annual
Environmental Soil Sampling Air Quality Class II Permit No. 88788**

Dear Mr. Czecholinski:

Attached please find the Annual Environmental Soil Sampling Results for the Pinyon Plain Mine for 2024. The Environmental Soil Monitoring Results are required by Section II.B.2.b of Attachment D to the Arizona Department of Environmental Quality ("ADEQ") Air Quality Class II Permit No. 88788 (the "Permit") for the Pinyon Plain Mine. Attachment D, Section II.B.2.b requires that soil samples be collected within 60 days of Permit issuance and subsequent samples be collected quarterly for one year and annually thereafter. Reporting of soil data is required within 30 days of data receipt. As previously noted, the final quarterly soil sampling data required by the Permit was submitted in November 2017. Beginning in 2018, soil samples were collected annually. Also attached is a certification signature as required by VIII of Attachment A to the Permit.

The soil results are below the trigger levels specified in the Permit. No additional reporting as contemplated in Attachment D, Section II.B.3.c and Section II.B.3.d is required.

If you have any questions or comments, please do not hesitate to contact me at 303-389-4131.

Yours very truly,

A handwritten signature in black ink that reads 'Jordan C. App'.

ENERGY FUELS RESOURCES (USA) INC.
Jordan C. App
Environmental Scientist

cc: Scott Bakken Tyler Martin
Travis Chiotti Nick Marin
Matt Germansen Kathy Weinel
Chris Greb
Tyler Martin

ANNUAL ENVIRONMENTAL SOIL MONITORING REPORT
FOR 2024
ENERGY FUELS RESOURCES (USA) INC.



PINYON PLAIN MINE
6.5 MILES SOUTHEAST OF TUSAYAN
COCONINO COUNTY, ARIZONA

August 19, 2024

PREPARED BY:
Energy Fuels Resources (USA) Inc.
225 Union Boulevard, Ste. 600
Lakewood, Colorado 80228

Contents

| | |
|---|---|
| 1.0 Introduction | 1 |
| 2.0 Radiation Monitoring Activities | 1 |
| 3.0 Trigger Levels..... | 2 |
| 4.0 Analysis of Findings | 2 |
| 5.0 Certification..... | 3 |

Appendices

| | |
|------------|-----------------------------------|
| Appendix A | Pinyon Plain Soil Results |
| Appendix B | Pinyon Plain Mine Laboratory Data |

FIGURES

| | |
|----------|--------------------------------------|
| Figure 1 | Sampling and Monitoring Location Map |
|----------|--------------------------------------|

Pinyon Plain Mine Air Quality Control Permit No. 88788

1.0 Introduction

The Pinyon Plain Mine (the “Mine”) is an underground uranium mine, operated by Energy Fuels Resources (USA) Inc. (“EFRI”). The Mine is located 6.5 miles southeast of Tusayan in Coconino County, Arizona. The Mine is capable of producing a maximum of 109,500 tons per year of uranium ore. Ore is hauled to the White Mesa Mill (the “Mill”), near Blanding, Utah for processing. No ore processing occurs on site when operating. The site contains a mine shaft, a ventilation shaft, an office building, a head-frame and associated hoist and maintenance building, a septic vault, ore stockpiles (when mining), development rock stockpiles (when mining), topsoil stockpiles, other facilities associated with the mine operation and a lined non-stormwater impoundment. The location of the Mine is shown on Figure 1.

Pursuant to Attachment D, Section II.A of the Arizona Department of Environmental Quality (ADEQ”) Air Quality Control Permit, Number 88788 (the “Permit”), EFRI is required to conduct soil and gamma monitoring at six locations outside of the mine site. The locations are shown on Figure 1. The frequency of monitoring is described in Section 2 below.

This report presents the soil monitoring results for the Mine as required by the Permit and as described below.

2.0 Radiation Monitoring Activities

Pursuant to the current Permit, approved on October 13, 2016, soil and passive gamma monitoring is required to be conducted in accordance with the ADEQ-approved standard Operating Procedures (“SOPs”) included as Appendices 2 and 3 to the Permit. Attachment D, Section II.B.1.b requires that Optically Stimulated Luminescence (“OSL”) monitors for passive gamma be collected on a calendar quarter basis. Attachment D, Section II.B.2.b requires that soil samples be collected within 60 days of Permit issuance and subsequent samples be collected quarterly for one year and annually thereafter. Reporting of both soil and gamma data is required within 30 days of data receipt. Pursuant to the Permit, 5 quarterly soil samples were collected from fourth quarter 2016 through fourth quarter 2017. Soil sampling was conducted annually starting in 2018. The annual 2024 results are reported herein.

Gamma data will be reported under separate cover within 30 days of data receipt in accordance with the Permit requirements.

3.0 Trigger Levels

Attachment D, Section II.B.3.c specifies Initial Action Trigger Levels (“trigger level”) for uranium and radium-226 in soil and passive gamma results. The ADEQ-approved trigger levels were developed as described in the ADEQ Technical Review and Evaluation of Application for Air Quality Significant Revision and in the report entitled *Development of the Proposed Trigger Levels for Energy Fuel’s Arizona Mines*.

The trigger level for uranium and radium-226 in soil are 60 mg/kg and 20 pCi/g respectively. The soil results reported herein will be compared to this trigger level.

4.0 Analysis of Findings


Soil and duplicate results are included in Appendix A.

The soil results are below the trigger levels specified in the Permit. No additional reporting as contemplated in Attachment D, Section II.B.3.c and Section II.B.3.d is required.

5.0 Certification

**ENERGY FUELS RESOURCES (USA) INC.
PINYON PLAIN MINE, AIR QUALITY CONTROL PERMIT NUMBER 88788
CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS**

Based on information and belief formed after reasonable inquiry, the statements and information in the foregoing document are true, accurate, and complete.



Signature of Responsible Official
Scott Bakken
Vice President, Regulatory Affairs

Date

APPENDIX A
PINYON PLAIN SOIL RESULTS

Summary of Soil Results for Pinyon Plain Mine

| Badge Location | Uranium Trigger Level (mg/kg) | Uranium Results (mg/kg) | Radium-226 Trigger Level (pCi/g) | Radium-226 Results (pCi/g) |
|------------------------------|--------------------------------------|--------------------------------|---|-----------------------------------|
| Fourth Quarter 2016 | | | | |
| Pinyon Plain South (66) | 60 | 1.02 | 20 | 1 ± 0.23 |
| Pinyon Plain West (67) | | 0.96 | | 1.1 ± 0.23 |
| Pinon Plain North (68) | | 0.65 | | 0.91 ± 0.25 |
| Pinyon Plain East (69) | | 0.57 | | 0.54 ± 0.16 |
| Duplicate (70) of East (69) | | 0.59 | | 0.88 ± 0.22 |
| First Quarter 2017 | | | | |
| Duplicate (65) of East (69) | 60 | 0.67 | 20 | 0.64 ± 0.19 |
| Pinyon Plain South (66) | | 0.75 | | 0.81 ± 0.19 |
| Pinyon Plain West (67) | | 0.93 | | 1.5 ± 0.27 |
| Pinon Plain North (68) | | 0.60 | | 1 ± 0.25 |
| Pinyon Plain East (69) | | 0.60 | | 0.41 ± 0.2 |
| Second Quarter 2017 | | | | |
| Duplicate (65) of South (66) | 60 | 1.66 | 20 | 2 ± 0.26 |
| Pinyon Plain South (66) | | 1.78 | | 1.3 ± 0.26 |
| Pinyon Plain West (67) | | 0.97 | | 1.2 ± 0.29 |
| Pinon Plain North (68) | | 0.64 | | 1.4 ± 0.3 |
| Pinyon Plain East (69) | | 0.58 | | 0.61 ± 0.27 |
| Third Quarter 2017 | | | | |
| Duplicate (65) of South (66) | 60 | 0.74 | 20 | 0.31 ± 0.14 |
| Pinyon Plain South (66) | | 0.81 | | 1 ± 0.2 |
| Pinyon Plain West (67) | | 0.84 | | 1 ± 0.2 |
| Pinon Plain North (68) | | 0.57 | | 0.8 ± 0.19 |
| Pinyon Plain East (69) | | 0.57 | | 0.3 ± 0.2 |
| Fourth Quarter 2017 | | | | |
| Duplicate (65) of South (66) | 60 | 0.81 | 20 | 0.77 ± 0.17 |
| Pinyon Plain South (66) | | 1.07 | | 0.87 ± 0.18 |
| Pinyon Plain West (67) | | 0.85 | | 1.2 ± 0.23 |
| Pinon Plain North (68) | | 0.58 | | 0.75 ± 0.22 |
| Pinyon Plain East (69) | | 0.54 | | 0.63 ± 0.18 |
| Annual 2018 | | | | |
| Duplicate (65) of North (68) | 60 | 0.59 | 20 | 1.2 ± 0.35 |
| Pinyon Plain South (66) | | 0.72 | | 0.74 ± 0.24 |
| Pinyon Plain West (67) | | 0.84 | | 1.1 ± 0.28 |
| Pinon Plain North (68) | | 0.54 | | 0.91 ± 0.2 |
| Pinyon Plain East (69) | | 0.52 | | 0.71 ± 0.19 |
| Annual 2019 | | | | |
| Duplicate of North (68) | 60 | 0.69 | 20 | 1.4 ± 0.31 |
| Pinyon Plain South (66) | | 0.70 | | 0.83 ± 0.17 |
| Pinyon Plain West (67) | | 0.89 | | 1.4 ± 0.27 |
| Pinon Plain North (68) | | 0.63 | | 1 ± 0.22 |
| Pinyon Plain East (69) | | 0.55 | | 1.1 ± 0.21 |

Summary of Soil Results for Pinyon Plain Mine

| Badge Location | Uranium Trigger Level (mg/kg) | Uranium Results (mg/kg) | Radium-226 Trigger Level (pCi/g) | Radium-226 Results (pCi/g) |
|-------------------------------|--------------------------------------|--------------------------------|---|-----------------------------------|
| Annual 2020 | | | | |
| Duplicate of West (67) | 60 | 0.86 | 20 | 1.4 ± 0.22 |
| Pinyon Plain South (66) | | 0.67 | | 1 ± 0.18 |
| Pinyon Plain West (67) | | 0.89 | | 1.2 ± 0.21 |
| Pinon Plain North (68) | | 0.64 | | 1.1 ± 0.25 |
| Pinyon Plain East (69) | | 0.55 | | 1 ± 0.23 |
| Annual 2021 | | | | |
| Duplicate of South (66) | 60 | 0.755 | 20 | 0.43 ± 0.14 |
| Pinyon Plain South (66) | | 0.801 | | 0.82 ± 0.17 |
| Pinyon Plain West (67) | | 0.937 | | 0.94 ± 0.19 |
| Pinon Plain North (68) | | 0.657 | | 0.92 ± 0.24 |
| Pinyon Plain East (69) | | 0.593 | | 0.52 ± 0.2 |
| Pinyon Plain Southwest (114) | | 0.849 | | 1.2 ± 0.24 |
| Pinyon Plain Southeast (115) | | 0.472 | | 0.25 ± 0.17 |
| Annual 2022 | | | | |
| Duplicate of East (69) | 60 | 0.571 | 20 | 0.57 ± 0.21 |
| Pinyon Plain South (66) | | 0.939 | | 0.43 ± 0.2 |
| Pinyon Plain West (67) | | 0.937 | | 0.91 ± 0.24 |
| Pinon Plain North (68) | | 0.637 | | 0.78 ± 0.22 |
| Pinyon Plain East (69) | | 0.577 | | 0.51 ± 0.26 |
| Pinyon Plain Southwest (114) | | 0.937 | | 1.1 ± 0.24 |
| Pinyon Plain Southeast (115) | | 0.608 | | 0.65 ± 0.19 |
| Annual 2023 | | | | |
| Pinyon Plain South (66) | 60 | 0.992 | 20 | 0.4 ± 0.15 |
| Pinyon Plain West (67) | | 0.972 | | 0.87 ± 0.24 |
| Pinon Plain North (68) | | 0.593 | | 0.62 ± 0.19 |
| Pinyon Plain East (69) | | 0.581 | | 0.38 ± 0.15 |
| Pinyon Plain Southwest (114) | | 0.747 | | 0.98 ± 0.18 |
| Pinyon Plain Southeast (115) | | 0.505 | | 0.32 ± 0.2 |
| Duplicate of Southeast (1115) | | 0.527 | | 0.8 ± 0.19 |
| Annual 2024 | | | | |
| Pinyon Plain South (66) | 60 | 0.998 | 20 | 0.71 ± 0.14 |
| Pinyon Plain West (67) | | 0.938 | | 0.92 ± 0.15 |
| Pinon Plain North (68) | | 0.631 | | 0.98 ± 0.19 |
| Pinyon Plain East (69) | | 1.050 | | 0.72 ± 0.15 |
| Pinyon Plain Southwest (114) | | 0.765 | | 1.4 ± 0.2 |
| Pinyon Plain Southeast (115) | | 0.868 | | 0.72 ± 0.15 |

APPENDIX B

PINYON PLAIN LABORATORY DATA

August 14, 2024

Report to:

Kathy Weinel
Energy Fuels Resources (USA) Inc.
225 Union Blvd. ,Suite 600
Lakewood, CO 80228

Bill to:

Accounts Payable
Energy Fuels Resources (USA) Inc.
225 Union Blvd. ,Suite 600
Lakewood, CO 80228

Project ID:

ACZ Project ID: L89098

Kathy Weinel:

Enclosed are the analytical results for sample(s) submitted to ACZ Laboratories, Inc. (ACZ) on July 19, 2024. This project has been assigned to ACZ's project number, L89098. Please reference this number in all future inquiries.

All analyses were performed according to ACZ's Quality Assurance Plan. The enclosed results relate only to the samples received under L89098. Each section of this report has been reviewed and approved by the appropriate Laboratory Supervisor, or a qualified substitute.

Except as noted, the test results for the methods and parameters listed on ACZ's current NELAC certificate letter (#ACZ) meet all requirements of NELAC.

This report shall be used or copied only in its entirety. ACZ is not responsible for the consequences arising from the use of a partial report.

All samples and sub-samples associated with this project will be disposed of after September 13, 2024. If the samples are determined to be hazardous, additional charges apply for disposal (typically \$11/sample). If you would like the samples to be held longer than ACZ's stated policy or to be returned, please contact your Project Manager or Customer Service Representative for further details and associated costs. ACZ retains analytical raw data reports for ten years.

If you have any questions or other needs, please contact your Project Manager.



Madeleine Murray has reviewed
and approved this report.



Energy Fuels Resources (USA) Inc.

Project ID:

Sample ID: PP #69

ACZ Sample ID: **L89098-01**

Date Sampled: 07/10/24 14:45

Date Received: 07/19/24

Sample Matrix: Soil

Metals Analysis

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-----------------------|------------|----------|--------|------|----|-------|-------|-------|----------------|---------|
| Uranium, total (3050) | EPA 6020B | 510 | 1.05 | | * | mg/Kg | 0.051 | 0.255 | 08/07/24 10:28 | aps |

Soil Analysis

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-----------------|------------|----------|--------|------|----|-------|-----|-----|---------------|---------|
| Solids, Percent | D2216-80 | 1 | 98.8 | | * | % | 0.1 | 0.5 | 07/31/24 4:17 | bdc |

Soil Preparation

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-------------------------|-------------------|----------|--------|------|----|-------|-----|-----|----------------|---------|
| Air Dry at 34 Degrees C | USDA No. 1, 1972 | | | | * | | | | 07/29/24 12:08 | rsh |
| Digestion - Hot Plate | EPA 3050B | | | | * | | | | 08/05/24 18:32 | rsh |
| Sieve-2000 um (2.0mm) | ASA No.9 15-4.2.2 | | | | * | | | | 08/01/24 12:55 | rsh |

Arizona license number: AZ0102

Energy Fuels Resources (USA) Inc.

Project ID:

Sample ID: PP #68

ACZ Sample ID: **L89098-02**

Date Sampled: 07/10/24 14:20

Date Received: 07/19/24

Sample Matrix: Soil

Metals Analysis

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-----------------------|------------|----------|--------|------|----|-------|--------|-------|----------------|---------|
| Uranium, total (3050) | EPA 6020B | 505 | 0.631 | | * | mg/Kg | 0.0505 | 0.253 | 08/07/24 10:33 | aps |

Soil Analysis

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-----------------|------------|----------|--------|------|----|-------|-----|-----|---------------|---------|
| Solids, Percent | D2216-80 | 1 | 98.5 | | * | % | 0.1 | 0.5 | 07/31/24 5:14 | bdc |

Soil Preparation

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-------------------------|-------------------|----------|--------|------|----|-------|-----|-----|----------------|---------|
| Air Dry at 34 Degrees C | USDA No. 1, 1972 | | | | * | | | | 07/29/24 12:34 | rsh |
| Digestion - Hot Plate | EPA 3050B | | | | * | | | | 08/05/24 18:48 | rsh |
| Sieve-2000 um (2.0mm) | ASA No.9 15-4.2.2 | | | | * | | | | 08/01/24 13:09 | rsh |

Arizona license number: AZ0102

Energy Fuels Resources (USA) Inc.

Project ID:
 Sample ID: PP #67

ACZ Sample ID: **L89098-03**
 Date Sampled: 07/10/24 14:05
 Date Received: 07/19/24
 Sample Matrix: Soil

Metals Analysis

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-----------------------|------------|----------|--------|------|----|-------|-------|-------|----------------|---------|
| Uranium, total (3050) | EPA 6020B | 510 | 0.938 | | * | mg/Kg | 0.051 | 0.255 | 08/07/24 10:35 | aps |

Soil Analysis

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-----------------|------------|----------|--------|------|----|-------|-----|-----|---------------|---------|
| Solids, Percent | D2216-80 | 1 | 98.0 | | * | % | 0.1 | 0.5 | 07/31/24 6:10 | bdc |

Soil Preparation

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-------------------------|-------------------|----------|--------|------|----|-------|-----|-----|----------------|---------|
| Air Dry at 34 Degrees C | USDA No. 1, 1972 | | | | * | | | | 07/29/24 13:00 | rsh |
| Digestion - Hot Plate | EPA 3050B | | | | * | | | | 08/05/24 19:05 | rsh |
| Sieve-2000 um (2.0mm) | ASA No.9 15-4.2.2 | | | | * | | | | 08/01/24 13:23 | rsh |

Arizona license number: AZ0102

Energy Fuels Resources (USA) Inc.

Project ID:

Sample ID: PP #66

ACZ Sample ID: **L89098-04**

Date Sampled: 07/10/24 15:35

Date Received: 07/19/24

Sample Matrix: Soil

Metals Analysis

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-----------------------|------------|----------|--------|------|----|-------|------|------|----------------|---------|
| Uranium, total (3050) | EPA 6020B | 500 | 0.998 | | * | mg/Kg | 0.05 | 0.25 | 08/07/24 10:37 | aps |

Soil Analysis

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-----------------|------------|----------|--------|------|----|-------|-----|-----|---------------|---------|
| Solids, Percent | D2216-80 | 1 | 99.3 | | * | % | 0.1 | 0.5 | 07/31/24 7:07 | bdc |

Soil Preparation

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|----------------------------|-------------------|----------|--------|------|----|-------|-----|-----|----------------|---------|
| Air Dry at 34 Degrees C | USDA No. 1, 1972 | | | | * | | | | 07/29/24 13:25 | rsh |
| Digestion - Hot Plate | EPA 3050B | | | | * | | | | 08/05/24 19:21 | rsh |
| Sieve-2000 um (2.0mm) | ASA No.9 15-4.2.2 | | | | * | | | | 08/01/24 13:37 | rsh |

Arizona license number: **AZ0102**

Energy Fuels Resources (USA) Inc.

Project ID:
Sample ID: PP #114

ACZ Sample ID: **L89098-05**
Date Sampled: 07/10/24 13:48
Date Received: 07/19/24
Sample Matrix: Soil

Metals Analysis

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-----------------------|------------|----------|--------|------|----|-------|-------|-------|----------------|---------|
| Uranium, total (3050) | EPA 6020B | 510 | 0.765 | | * | mg/Kg | 0.051 | 0.255 | 08/07/24 10:39 | aps |

Soil Analysis

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-----------------|------------|----------|--------|------|----|-------|-----|-----|---------------|---------|
| Solids, Percent | D2216-80 | 1 | 98.1 | | * | % | 0.1 | 0.5 | 07/31/24 8:03 | bdc |

Soil Preparation

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-------------------------|-------------------|----------|--------|------|----|-------|-----|-----|----------------|---------|
| Air Dry at 34 Degrees C | USDA No. 1, 1972 | | | | * | | | | 07/29/24 13:51 | rsh |
| Digestion - Hot Plate | EPA 3050B | | | | * | | | | 08/05/24 19:37 | rsh |
| Sieve-2000 um (2.0mm) | ASA No.9 15-4.2.2 | | | | * | | | | 08/01/24 13:50 | rsh |

Arizona license number: AZ0102

Energy Fuels Resources (USA) Inc.

Project ID:

Sample ID: PP #115

ACZ Sample ID: **L89098-06**

Date Sampled: 07/10/24 13:15

Date Received: 07/19/24

Sample Matrix: Soil

Metals Analysis

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-----------------------|------------|----------|--------|------|----|-------|-------|-------|----------------|---------|
| Uranium, total (3050) | EPA 6020B | 510 | 0.868 | | * | mg/Kg | 0.051 | 0.255 | 08/07/24 10:40 | aps |

Soil Analysis

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-----------------|------------|----------|--------|------|----|-------|-----|-----|---------------|---------|
| Solids, Percent | D2216-80 | 1 | 98.7 | | * | % | 0.1 | 0.5 | 07/31/24 9:00 | bdc |

Soil Preparation

| Parameter | EPA Method | Dilution | Result | Qual | XQ | Units | MDL | PQL | Date | Analyst |
|-------------------------|-------------------|----------|--------|------|----|-------|-----|-----|----------------|---------|
| Air Dry at 34 Degrees C | USDA No. 1, 1972 | | | | * | | | | 07/29/24 14:17 | rsh |
| Digestion - Hot Plate | EPA 3050B | | | | * | | | | 08/05/24 19:54 | rsh |
| Sieve-2000 um (2.0mm) | ASA No.9 15-4.2.2 | | | | * | | | | 08/01/24 14:04 | rsh |

Arizona license number: AZ0102

Energy Fuels Resources (USA) Inc.

Project ID:

Sample ID: PP #69

Locator:

ACZ Sample ID: **L89098-01**

Date Sampled: 07/10/24 14:45

Date Received: 07/19/24

Sample Matrix: Soil

Radium 226 (3050)

Prep Method:

EPA 903.1

| Parameter | Measure Date | Prep Date | Result | Error(+/-) | LLD | Units | XQ | Analyst |
|-------------------|---------------|-----------|--------|------------|------|-------|----|---------|
| Radium 226 (3050) | 08/13/24 0:00 | | 0.72 | 0.15 | 0.33 | pCi/g | * | ang |

Arizona license number: **AZ0102**

Energy Fuels Resources (USA) Inc.

Project ID:

Sample ID: PP #68

Locator:

ACZ Sample ID: **L89098-02**

Date Sampled: 07/10/24 14:20

Date Received: 07/19/24

Sample Matrix: Soil

Radium 226 (3050)

Prep Method:

EPA 903.1

| Parameter | Measure Date | Prep Date | Result | Error(+/-) | LLD | Units | XQ | Analyst |
|-------------------|---------------|-----------|--------|------------|------|-------|----|---------|
| Radium 226 (3050) | 08/13/24 0:00 | | 0.98 | 0.19 | 0.74 | pCi/g | * | ang |

Arizona license number: AZ0102

Energy Fuels Resources (USA) Inc.

Project ID:

Sample ID: PP #67

Locator:

ACZ Sample ID: **L89098-03**

Date Sampled: 07/10/24 14:05

Date Received: 07/19/24

Sample Matrix: Soil

Radium 226 (3050)

Prep Method:

EPA 903.1

| Parameter | Measure Date | Prep Date | Result | Error(+/-) | LLD | Units | XQ | Analyst |
|-------------------|---------------|-----------|--------|------------|------|-------|----|---------|
| Radium 226 (3050) | 08/13/24 0:00 | | 0.92 | 0.15 | 0.36 | pCi/g | * | ang |

Arizona license number: AZ0102

Energy Fuels Resources (USA) Inc.

Project ID:

Sample ID: PP #66

Locator:

ACZ Sample ID: **L89098-04**

Date Sampled: 07/10/24 15:35

Date Received: 07/19/24

Sample Matrix: Soil

Radium 226 (3050)

Prep Method:

EPA 903.1

| Parameter | Measure Date | Prep Date | Result | Error(+/-) | LLD | Units | XQ | Analyst |
|-------------------|---------------|-----------|--------|------------|------|-------|----|---------|
| Radium 226 (3050) | 08/13/24 0:00 | | 0.71 | 0.14 | 0.52 | pCi/g | * | ang |

Arizona license number: AZ0102

Energy Fuels Resources (USA) Inc.

Project ID:

Sample ID: PP #114

Locator:

ACZ Sample ID: **L89098-05**

Date Sampled: 07/10/24 13:48

Date Received: 07/19/24

Sample Matrix: Soil

Radium 226 (3050)

Prep Method:

EPA 903.1

| Parameter | Measure Date | Prep Date | Result | Error(+/-) | LLD | Units | XQ | Analyst |
|-------------------|---------------|-----------|--------|------------|------|-------|----|---------|
| Radium 226 (3050) | 08/13/24 0:00 | | 1.4 | 0.2 | 0.48 | pCi/g | * | ang |

Arizona license number: **AZ0102**

Energy Fuels Resources (USA) Inc.

Project ID:

Sample ID: PP #115

Locator:

ACZ Sample ID: **L89098-06**

Date Sampled: 07/10/24 13:15

Date Received: 07/19/24

Sample Matrix: Soil

Radium 226 (3050)

Prep Method:

EPA 903.1

| Parameter | Measure Date | Prep Date | Result | Error(+/-) | LLD | Units | XQ | Analyst |
|-------------------|---------------|-----------|--------|------------|-----|-------|----|---------|
| Radium 226 (3050) | 08/13/24 0:00 | | 0.72 | 0.15 | 1 | pCi/g | * | ang |

Arizona license number: AZ0102



Laboratories, Inc.

2773 Downhill Drive Steamboat Springs, CO 80487 (800) 334-5493

Inorganic Reference

Report Header Explanations

| | |
|----------------|--|
| <i>Batch</i> | A distinct set of samples analyzed at a specific time |
| <i>Found</i> | Value of the QC Type of interest |
| <i>Limit</i> | Upper limit for RPD, in %. |
| <i>Lower</i> | Lower Recovery Limit, in % (except for LCSS, mg/Kg) |
| <i>MDL</i> | Method Detection Limit. Same as Minimum Reporting Limit unless omitted or equal to the PQL (see comment #5). Allows for instrument and annual fluctuations. |
| <i>PCN/SCN</i> | A number assigned to reagents/standards to trace to the manufacturer's certificate of analysis |
| <i>PQL</i> | Practical Quantitation Limit. Synonymous with the EPA term "minimum level". |
| <i>QC</i> | True Value of the Control Sample or the amount added to the Spike |
| <i>Rec</i> | Recovered amount of the true value or spike added, in % (except for LCSS, mg/Kg) |
| <i>RPD</i> | Relative Percent Difference, calculation used for Duplicate QC Types |
| <i>Upper</i> | Upper Recovery Limit, in % (except for LCSS, mg/Kg) |
| <i>Sample</i> | Value of the Sample of interest |

QC Sample Types

| | | | |
|--------------|--|--------------|--|
| <i>AS</i> | Analytical Spike (Post Digestion) | <i>LCSSD</i> | Laboratory Control Sample - Water Duplicate |
| <i>ASD</i> | Analytical Spike (Post Digestion) Duplicate | <i>LFB</i> | Laboratory Fortified Blank |
| <i>CCB</i> | Continuing Calibration Blank | <i>LFM</i> | Laboratory Fortified Matrix |
| <i>CCV</i> | Continuing Calibration Verification standard | <i>LFMD</i> | Laboratory Fortified Matrix Duplicate |
| <i>DUP</i> | Sample Duplicate | <i>LRB</i> | Laboratory Reagent Blank |
| <i>ICB</i> | Initial Calibration Blank | <i>MS</i> | Matrix Spike |
| <i>ICV</i> | Initial Calibration Verification standard | <i>MSD</i> | Matrix Spike Duplicate |
| <i>ICSAB</i> | Inter-element Correction Standard - A plus B solutions | <i>PBS</i> | Prep Blank - Soil |
| <i>LCSS</i> | Laboratory Control Sample - Soil | <i>PBW</i> | Prep Blank - Water |
| <i>LCSSD</i> | Laboratory Control Sample - Soil Duplicate | <i>PQV</i> | Practical Quantitation Verification standard |
| <i>LCSW</i> | Laboratory Control Sample - Water | <i>SDL</i> | Serial Dilution |

QC Sample Type Explanations

| | |
|-------------------------|---|
| Blanks | Verifies that there is no or minimal contamination in the prep method or calibration procedure. |
| Control Samples | Verifies the accuracy of the method, including the prep procedure. |
| Duplicates | Verifies the precision of the instrument and/or method. |
| Spikes/Fortified Matrix | Determines sample matrix interferences, if any. |
| Standard | Verifies the validity of the calibration. |

EFRC

ACZ Project ID: **L89098**

NOTE: If the Rec% column is null, the high/low limits are in the same units as the result. If the Rec% column is not null, then the high/low limits are in % Rec.

Solids, Percent

D2216-80

| ACZ ID | Type | Analyzed | PCN/SCN | QC | Sample | Found | Units | Rec% | Lower | Upper | RPD | Limit | Qual |
|-----------------|------|----------------|---------|----|--------|-------|-------|------|-------|-------|-----|-------|------|
| WG594098 | | | | | | | | | | | | | |
| WG594098PBS | PBS | 07/30/24 14:10 | | | | U | % | | -0.1 | 0.1 | | | |
| L89084-01DUP | DUP | 07/30/24 16:03 | | | 87.8 | 88.4 | % | | | | 1 | 20 | |

Uranium, total (3050)

EPA 6020B

| ACZ ID | Type | Analyzed | PCN/SCN | QC | Sample | Found | Units | Rec% | Lower | Upper | RPD | Limit | Qual |
|-----------------|-------|----------------|-------------|------|--------|----------|-------|------|---------|--------|-----|-------|------|
| WG594716 | | | | | | | | | | | | | |
| WG594716ICV | ICV | 08/07/24 9:38 | MS240613-12 | .05 | | .05036 | mg/L | 101 | 90 | 110 | | | |
| WG594716ICB | ICB | 08/07/24 9:39 | | | | U | mg/L | | -0.0003 | 0.0003 | | | |
| WG593742PBS | PBS | 08/07/24 9:50 | | | | U | mg/Kg | | -0.15 | 0.15 | | | |
| WG594602PBS | PBS | 08/07/24 10:06 | | | | U | mg/Kg | | -0.15 | 0.15 | | | |
| WG594602LCSS1 | LCSS | 08/07/24 10:12 | PCN626769 | 47.2 | | 42.29721 | mg/Kg | | 36.2 | 58.2 | | | |
| WG594602LCSSD1 | LCSSD | 08/07/24 10:13 | PCN626769 | 47.2 | | 42.24028 | mg/Kg | | 36.2 | 58.2 | 0 | 20 | |
| L89097-01MS | MS | 08/07/24 10:17 | MS240613-4 | 12.5 | 3.62 | 15.56341 | mg/Kg | 96 | 75 | 125 | | | |
| L89097-01MSD | MSD | 08/07/24 10:19 | MS240613-4 | 12.5 | 3.62 | 16.88337 | mg/Kg | 106 | 75 | 125 | 8 | 20 | |

Energy Fuels Resources (USA) Inc.

ACZ Project ID: **L89098**

| ACZ ID | WORKNUM | PARAMETER | METHOD | QUAL | DESCRIPTION |
|--------|---------|-----------|--------|------|-------------|
|--------|---------|-----------|--------|------|-------------|

No extended qualifiers associated with this analysis

Report Header Explanations

| | |
|-------------------|--|
| <i>Batch</i> | A distinct set of samples analyzed at a specific time |
| <i>Error(+/-)</i> | Calculated sample specific uncertainty |
| <i>Found</i> | Value of the QC Type of interest |
| <i>Limit</i> | Upper limit for RPD, in %. |
| <i>LCL</i> | Lower Control Limit, in % (except for LCSS, mg/Kg) |
| <i>LLD</i> | Calculated sample specific Lower Limit of Detection |
| <i>PCN/SCN</i> | A number assigned to reagents/standards to trace to the manufacturer's certificate of analysis |
| <i>PQL</i> | Practical Quantitation Limit |
| <i>QC</i> | True Value of the Control Sample or the amount added to the Spike |
| <i>Rec</i> | Amount of the true value or spike added recovered, in % (except for LCSS, mg/Kg) |
| <i>RER</i> | Relative Error Ratio, calculation used for Dup. QC taking into account the error factor. |
| <i>RPD</i> | Relative Percent Difference, calculation used for Duplicate QC Types |
| <i>UCL</i> | Upper Control Limit, in % (except for LCSS, mg/Kg) |
| <i>Sample</i> | Value of the Sample of interest |

QC Sample Types

| | | | |
|-------------|-----------------------------------|---------------|-------------------------------------|
| <i>DUP</i> | Sample Duplicate | <i>MS/MSD</i> | Matrix Spike/Matrix Spike Duplicate |
| <i>LCSS</i> | Laboratory Control Sample - Soil | <i>PBS</i> | Prep Blank - Soil |
| <i>LCSW</i> | Laboratory Control Sample - Water | <i>PBW</i> | Prep Blank - Water |

QC Sample Type Explanations

| | |
|-----------------|--|
| Blanks | Verifies that there is no or minimal contamination in the prep method procedure. |
| Control Samples | Verifies the accuracy of the method, including the prep procedure. |
| Duplicates | Verifies the precision of the instrument and/or method. |
| Matrix Spikes | Determines sample matrix interferences, if any. |

ACZ Qualifiers (Qual)

| | |
|---|-------------------------------------|
| H | Analysis exceeded method hold time. |
|---|-------------------------------------|

Method Prefix Reference

| | |
|-----|---|
| M | EPA methodology, including those under SDWA, CWA, and RCRA |
| SM | Standard Methods for the Examination of Water and Wastewater. |
| D | ASTM |
| RP | DOE |
| ESM | DOE/ESM |

Comments

- (1) Solid matrices are reported on a dry weight basis.
- (2) Preparation method: "Method" indicates preparation defined in analytical method.
- (3) QC results calculated from raw data. Results may vary slightly if the rounded values are used in the calculations.
- (4) An asterisk in the "XQ" column indicates there is an extended qualifier and/or certification qualifier associated with the result.

For a complete list of ACZ's Extended Qualifiers, please click:

<https://acz.com/wp-content/uploads/2019/04/Ext-Qual-List.pdf>



Laboratories, Inc.
 2773 Downhill Drive Steamboat Springs, CO 80487 (800) 334-5493

**Radiochemistry QC
 Summary**

ACZ Project ID: **L89098**

EFRC

NOTE: If the Rec% column is null, the high/low limits are in the same units as the result. If the Rec% column is not null, then the high/low limits are in % Rec.

Radium 226 (3050) EPA 903.1 **Units: pCi/g**

| ACZ ID | Type | Analyzed | PCN/SCN | QC | Sample | Error | LLD | Found | Error | LLD | Rec% | Lower | Upper | RPD/RER | Limit | Qual |
|-----------------|---------|----------|-----------|----|--------|-------|------|-------|-------|------|------|-------|-------|---------|-------|------|
| WG594644 | | | | | | | | | | | | | | | | |
| WG594532PBS | PBS | 08/13/24 | | | | | 0.12 | .2 | 0.12 | 0.5 | | | 1 | | | |
| WG594532LCSS | LCSS | 08/13/24 | PCN626041 | 40 | | 0.92 | 0.43 | 35 | 0.92 | 0.43 | 88 | 43 | 148 | | | |
| L89097-01MS | MS | 08/13/24 | PCN626041 | 40 | 2.4 | 0.28 | 0.72 | 42 | 1.2 | 1.7 | 99 | 43 | 148 | | | |
| L89097-02DUP | DUP-RPD | 08/13/24 | | | 1.3 | 0.2 | 0.53 | 1.6 | 0.23 | 0.64 | | | | 21 | 20 | RG |
| L89097-02DUP | DUP-RER | 08/13/24 | | | 1.3 | 0.2 | 0.53 | 1.6 | 0.23 | 0.64 | | | | 0.98 | 2 | |
| L89098-06DUP | DUP-RPD | 08/13/24 | | | 0.72 | 0.15 | 1 | .7 | 0.14 | 0.45 | | | | 3 | 20 | |

Energy Fuels Resources (USA) Inc.

ACZ Project ID: **L89098**

| ACZ ID | WORKNUM | PARAMETER | METHOD | QUAL | DESCRIPTION |
|-----------|----------|-------------------|-----------|------|--|
| L89098-01 | WG594644 | Radium 226 (3050) | EPA 903.1 | RG | Sample concentration is less than 5x LLD; RPD was not used for data validation. Replicate Error Ratio (RER) is less than 2. Precision judged to be in control. |
| L89098-02 | WG594644 | Radium 226 (3050) | EPA 903.1 | RG | Sample concentration is less than 5x LLD; RPD was not used for data validation. Replicate Error Ratio (RER) is less than 2. Precision judged to be in control. |
| L89098-03 | WG594644 | Radium 226 (3050) | EPA 903.1 | RG | Sample concentration is less than 5x LLD; RPD was not used for data validation. Replicate Error Ratio (RER) is less than 2. Precision judged to be in control. |
| L89098-04 | WG594644 | Radium 226 (3050) | EPA 903.1 | RG | Sample concentration is less than 5x LLD; RPD was not used for data validation. Replicate Error Ratio (RER) is less than 2. Precision judged to be in control. |
| L89098-05 | WG594644 | Radium 226 (3050) | EPA 903.1 | RG | Sample concentration is less than 5x LLD; RPD was not used for data validation. Replicate Error Ratio (RER) is less than 2. Precision judged to be in control. |

Energy Fuels Resources (USA) Inc.

ACZ Project ID: **L89098**

Metals Analysis

The following parameters are not offered for certification or are not covered by AZ certificate #AZ0102.

| | |
|-----------------------|-----------|
| Uranium, total (3050) | EPA 6020B |
|-----------------------|-----------|

Radiochemistry

The following parameters are not offered for certification or are not covered by AZ certificate #AZ0102.

| | |
|-------------------|-----------|
| Radium 226 (3050) | EPA 903.1 |
|-------------------|-----------|

Soil Analysis

The following parameters are not offered for certification or are not covered by AZ certificate #AZ0102.

| | |
|-----------------|----------|
| Solids, Percent | D2216-80 |
|-----------------|----------|

The following parameters are not offered for certification or are not covered by NELAC certificate #ACZ.

| | |
|-----------------|----------|
| Solids, Percent | D2216-80 |
|-----------------|----------|

Energy Fuels Resources (USA) Inc.

ACZ Project ID: L89098
 Date Received: 07/19/2024 10:52
 Received By:
 Date Printed: 7/22/2024

Receipt Verification

| | YES | NO | NA |
|---|-----|----|----|
| 1) Is a foreign soil permit included for applicable samples? | | | X |
| 2) Is the Chain of Custody form or other directive shipping papers present? | X | | |
| 3) Does this project require special handling procedures such as CLP protocol? | | X | |
| 4) Are any samples NRC licensable material? | | | X |
| 5) If samples are received past hold time, proceed with requested short hold time analyses? | X | | |
| 6) Is the Chain of Custody form complete and accurate? | X | | |
| 7) Were any changes made to the Chain of Custody form prior to ACZ receiving the samples? | | X | |

Samples/Containers

| | YES | NO | NA |
|---|-----|----|----|
| 8) Are all containers intact and with no leaks? | X | | |
| 9) Are all labels on containers and are they intact and legible? | X | | |
| 10) Do the sample labels and Chain of Custody form match for Sample ID, Date, and Time? | X | | |
| 11) For preserved bottle types, was the pH checked and within limits? ¹ | | | X |
| 12) Is there sufficient sample volume to perform all requested work? | X | | |
| 13) Is the custody seal intact on all containers? | | | X |
| 14) Are samples that require zero headspace acceptable? | | | X |
| 15) Are all sample containers appropriate for analytical requirements? | X | | |
| 16) Is there an Hg-1631 trip blank present? | | | X |
| 17) Is there a VOA trip blank present? | | | X |
| 18) Were all samples received within hold time? | X | | |

NA indicates Not Applicable

Chain of Custody Related Remarks

Client Contact Remarks

Shipping Containers

| Cooler Id | Temp (°C) | Temp Criteria (°C) | Rad (µR/Hr) | Custody Seal Intact? |
|-----------|-----------|--------------------|-------------|----------------------|
| NA42430 | 25.1 | NA | 15 | Yes |

Was ice present in the shipment container(s)?

No - Wet or gel ice was not present in the shipment container(s).

Client must contact an ACZ Project Manager if analysis should not proceed for samples received outside of their thermal preservation acceptance criteria.

Energy Fuels Resources (USA) Inc.

ACZ Project ID: L89098

Date Received: 07/19/2024 10:52

Received By:

Date Printed: 7/22/2024

¹ The preservation of the following bottle types is not checked at sample receipt: Orange (oil and grease), Purple (total cyanide), Pink (dissolved cyanide), Brown (arsenic speciation), Sterile (fecal coliform), EDTA (sulfite), HCl preserved vial (organics), Na₂S₂O₃ preserved vial (organics), and HG-1631 (total/dissolved mercury by method 1631).

FIGURE

Legend

- Soil Sample and Gamma Monitoring Location
- Evaporative Water System
- Redwall-Muav Water Supply/Monitoring Well
- Coconino Monitoring Well
- USGS Coconino Well
- Surface Water Diversion
- Berm
- 4" PVC Discharge
- Fence Line - Facility Area
- Rip Rap
- Building/Structure
- Major Contour - 5 ft
- Minor Contour - 1 ft

N

0 50 100 200

Feet

0 25 50 100

Meters

CF Energy Fuels
Resources (USA) Inc

Pinyon Plain Mine

T29N, R03E, Section 20, Coconino County, AZ

Sampling and Monitoring Location Map

