

Subject: Yesterday's DOI order regarding northern Arizona uranium mining, and DOI public statements and actions clearly indicating ongoing failure of the Grand Canyon EIS NEPA process
From: Larry Turner <dirxploration@fastmail.us>
Date: Tue, 21 Jun 2011 12:06:58 -0600
To: Scott Florence <Scott_Florence@blm.gov>
CC:

Dear Mr. Florence:

Please see USGS Director McNutt's "12% of total uranium resource in northern Arizona" comment made yesterday (6/20/11) concerning the northern Arizona uranium resource and the proposed withdrawal area reported at <http://www.mineweb.com/mineweb/view/mineweb/en/page68?oid=129781&sn=Detail&pid=102055>. According to the article cited, "U.S. Geological Survey Director Marcia McNutt estimated that 3,000 mining claims may be impacted; adding the lands which could be withdrawn represented only 12% of total uranium resource in northern Arizona."

Judging from this remark made by Ms. McNutt yesterday, DIR's observations of clear geological fact provided to the BLM in DIR's DEIS comment letter dated April 23, 2011, have been ignored by the USGS, leading to an unfortunate biasing of Secretary Salazar's current thinking with regard to the withdrawal decision at hand. See http://www.blm.gov/pgdata/etc/medialib/blm/az/pdfs/withdraw/deis/comments/w-attach.Par.94257.File.pdf/04-25-11_DIR.pdf in the event you have forgotten the nature of the information earlier provided by DIR to the BLM, lead agency for the ongoing EIS analysis. The data presented in the DIR DEIS comment letter show that the proposed withdrawal will affect about 76% (6.33x's the initial USGS estimate) of the total uranium resource in northern Arizona, not the 12% figure still being represented as being unbiased scientific data by the USGS.

You will recall that on 6/6/11 we wrote to you of our observation that DIR's comment letter concerning this particular subject had been, as of that date, left off of the BLM DEIS public comments webpage, and expressed to you our concern that this omission suggested that it was the BLM's intention to disregard the technical information provided to the agency by DIR. Naturally, Ms. McNutt's public statements yesterday did nothing at all to dispel DIR's earlier doubts and suspicions regarding the reasons behind the BLM's initial omission of DIR's DEIS comment letter from the public record.

From <http://www.examiner.com/grand-canyon-hiking-in-national/top-ranking-official-hikes-hermit-trail-to-dripping-springs-before-press-event>, we learned of the following statements also made by Interior representatives yesterday on the same general topic:

"Let us be cautious and let us be patient," exhorted Salazar who introduced Marcia McNutt, Director of the U.S. Geological Survey (USGS) as being from the "best earth science agency on earth."

The "USGS is very proud of its tradition of providing unbiased scientific data." stated McNutt. According to the USGS, the underground uranium affected by today's order would meet domestic needs for about six years -- based on current consumption."

Accepting as "unbiased scientific data" the USGS estimate that "12%" of the northern Arizona uranium resource is equivalent to 6 years of domestic needs under current consumption rates, the geological evidence provided to the BLM in DIR's DEIS comment letter indicates that the proposed withdrawal area actually contains something more like thirty-eight years worth of domestic fuel at current US nuclear reactor fuel consumption rates. This corrected estimate is arrived at by multiplying the initial USGS estimate of the percentage (12%) of the northern Arizona uranium resource in the proposed withdrawal area by 6.33 in order to take account of the distinct regional structural control of the distribution of Arizona's economic breccia pipe uranium mineralization. This distinct regional structural control, as explained, described, and illustrated in DIR's DEIS public comments letter, has geologically functioned to focus 76% of the economic uranium resource available to miners before July 2009 into the boundaries of the proposed withdrawal area.

Note further that the 6.33x USGS estimate-correction factor contained in the DIR DEIS comment letter did not take into account the further uranium ore resources 'multiplier effect' that evidently occurred in the much more numerous buried or hidden breccia pipes known to be present within the proposed withdrawal area (Figure 2 of http://www.blm.gov/pgdata/etc/medialib/blm/az/pdfs/withdraw/deis/comments/w-attach.Par.40252.File.pdf/05-02-11_Quaterra.pdf). As you may recall, these buried or hidden breccia pipes have only been relatively recently targeted by mineral exploration and mining companies working in the region because of the previously unsolved technical difficulty of locating these structures during mineral exploration work.

According to Figure 4 of DIR's DEIS comment letter, this buried pipe uranium mineralization resource multiplier effect probably has a value of about 4x per buried pipe, all other things being equal. (See the vertical gap between the line-of-best-fit for through-going breccia pipes and the single Hack 2 buried pipe example illustrated in DIR's DEIS comment letter Figure 4 graph to gauge the in-pipe uranium resource multiplier effect likely to be present in mineralized buried or hidden breccia pipes compared to more weakly mineralized breccia pipes that come all the way through to the present weathering surface). Referencing geological and geochemical theory, it is suspected that the anomalously large uranium resource found in the buried Hack 2 Mine breccia pipe type example was the direct result of such interrelated factors as slower mineralizing fluid flow rates through this particular type of breccia pipe, greater accumulations of uranium reductant (hydrocarbons) in such an unbreached petroleum reservoir, and more efficient solute precipitation reactions consequent of both slower within-pipe flow rates and comparatively larger within-pipe uranium-reductant accumulations. The influence of this mineralization resource 'multiplier effect' on future mine production from buried or hidden pipes in the proposed withdrawal area should extend the domestic uranium resource base from federal lands in northern Arizona proposed for withdrawal well beyond the minimum 38 years of current domestic need for nuclear fuel described here.

Thanks for your attention. We trust this email will help you and the BLM to correct the understanding of the Department of Interior and the USGS (i.e., the "best earth science agency on earth", "proud of its tradition of providing unbiased scientific data") concerning these matters well before the final version of the EIS is completed, and well before Mr. Salazar seeks to make a fully informed decision concerning the proposed withdrawal.

Cordially,

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President/Managing Geologist

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