



**Ute Mountain Ute
Tribal Historic Preservation Office**

P.O. Box 468
Towaoc, CO 81334



TO: Bureau of Land Management Utah State Office – Jacob Palma (Field Manager Monticello Field Office)

Date: May 19th, 2025

RE: Velvet Wood Mine Plan Modification

The Ute Mountain Ute (UMU) Tribal Historic Preservation Office (THPO) appreciates receiving information on the project dated; *May 13th, 2025*. In regards to this, please refer to the following statement(s) below:

Thank you for providing the Ute Mountain Ute (UMU) Tribe the opportunity to review and respond to the above proposed project Velvet Wood Mine Plan Modification

Please be advised we have reviewed the information provided the Velvet Wood Mine Plan Modification and the scope of work for each as follows (Part I: Undertaking Description, Part II: Identification Efforts, and Part III: Minimization and Avoidance):

- “Anfield Resources Holding Corp. (proponent) submitted a proposed Plan of Operations (PoO) Modification for the Velvet-Wood Mine to the Bureau of Land Management (BLM) Monticello Field Office (MFO) in April 2025 to mine uranium and vanadium. Uranium is identified as one of the minerals in EO114156. This proposal would modify the existing PoO for the Velvet Mine (UTU-68060) and add the Wood mineralization. The Velvet Mine is an existing conventional underground uranium/vanadium mine located near Lisbon Valley, in the central portion of the Colorado Plateau in southeastern Utah. It is approximately 10 miles south of La Sal and about 19 miles northeast of Monticello, Utah, in San Juan County. The mine is accessed from Utah Highway 191 via County Road B113 (Big Indian Road) and County Road B112 (Little Valley Road).
- The original Velvet Mine PoO was authorized under a Record of Decision (UT-069-88-36) issued by the BLM, Monticello Field Office in 1988. The proponent holds mining and exploration rights at the Velvet-Wood Mine area through 91 federal mineral claims and a Utah Mining Lease (No. ML 54557) of approximately 677 acres. The Plan provides for a total of about 28 acres of surface disturbance, the majority of which (approximately 25 acres) is located within areas of previous disturbance such as designated county roads, non-designated two-track routes, reclaimed mine portals and vent shafts. Most new surface disturbance will take place in the western portion of the project area at the Velvet Mine.

- At the Velvet Mine, the proponent's updated PoO includes re-opening the reclaimed mine portal, constructing temporary surface facilities such as an office, machine shop, fueling station, and other mine operation materials (northwest of the main works – see enclosures). The access road to the main locus would be extended beyond the current end of CR B112, widened to about 40 feet and maintained for trucks to come in and out. The Velvet water treatment facility would be constructed 0.5 miles (840m) to the east, off of a designated two track in a previously disturbed area. The water treatment facility would include a water pipeline (buried where possible) that would connect back to the main portal. This would be installed along the edge of an existing but non-designated two track road with a small trencher. The proponent would construct a second water treatment facility and pipeline at the Wood Mineralization. Three existing vent shafts would be re-opened and improved, and four new vent shafts would be constructed with a maximum surface disturbance area of 50 foot x 50 foot. The final footprint of the vent shafts after construction would be a 14 foot x 14 foot concrete pad with vent, fan (with sound dampeners), escape hatch, and a small temporary control room or “doghouse”. The two tack access roads to water treatment, vent shafts, and the explosives cache would not be widened or resurfaced but would need to be improved and maintained for safe use. All roads included in the PoO currently exist due to past mining activity, but some are non-designated and have either been reclaimed at the end of the last period of use, by abandoned mine land work, or have reclaimed naturally due to lack of use.”

We are informed our tribe has 7 days to replay or comment to this project. Were also informed about the Class III pedestrian survey were used for the current undertaking in Part II: Identification Efforts.

- “A consultant, who is permitted by the BLM to do archaeological survey work in San Juan County, Utah, was hired by the proponent to complete the Class III pedestrian survey for the Velvet-Wood Mine. A total of 223 acres were surveyed under U23HQ0750 (186.75 ac. on BLM lands, 30.25 ac. on State Trust Land Administration lands) with 5 sites recorded. A simultaneous survey (U23HQ0068) by the same archaeological contractor was ongoing for a separate undertaking that covered the Woods Portion of the project, near the northern boundary of the project. The survey for U24HQ0068 was determined adequate by the BLM for identification efforts for this undertaking and two sites recorded in that survey intersect the current undertaking. These two surveys cover the proposed ground disturbance and buffers to include construction, use and maintenance.
- The BLM identified two other sites, 42SA10413 and 42SA100414, within the project area through a literature search that were missed in the initial identification efforts. Both sites are small lithic scatters with less than 10 flakes each, considered ineligible at the time of original recording. The BLM was unable to identify these sites on the ground, and it is assumed they were misplotted during the records digitization effort and will not be affected by the undertaking.

We are informed of Part IIII minimization and avoidance of the sites (sites and description listed below provided by your agency).

- The BLM will avoid and minimize adverse effects to the three sites determined eligible to the National Register of Historic Places, noted in the above table.

- The first eligible site, 42SA27479 is a prehistoric lithic scatter and rock shelter with existing impacts from road construction, erosion and illegal looting near the Velvet mineralization. Use of the existing roads will not adversely affect the site. Road improvement work in the site, as proposed, will include replacing a culvert, and adding gravel to the road prism. All work within the site boundary will require the presence of an archaeological monitor. A water treatment facility is proposed in a previously disturbed location outside of the site boundary to the north. The proponent proposes to discharge water into a nearby drainage which could attract livestock and potentially cause indirect effects to the site. In order to avoid effects to the site, the BLM, range specialists, grazing allotment permittees, and the proponent will collaborate to implement measures to prevent livestock from congregating or trailing through the site boundary to access the water.
- Site 42SA18916 is a long-term residential prehistoric site, within a lithic procurement landscape. The site boundary was expanded to include several smaller sites during the current survey. Existing impacts from roads within the site, grazing, and recreational visitation are documented in previous recordings. Features are largely concentrated on the northern portion of the site boundary and will not be affected by use of the existing designated roads. The proposed mine plan of operations includes a water treatment site, water discharge pipeline, construction of new vent openings, and road improvements of existing but non-designated routes at the Wood mineralization. The pipeline to dispose of excess water from the treatment facility will be on the surface, and will follow the designated route out of the site boundary to the west. Despite previous ground disturbance in the proposed project area, the BLM will require the presence of an archaeological monitor for any ground disturbing construction activities within the site boundary. Through these avoidance and monitoring requirements, adverse effects to the site will be limited.
- Site 42SA18419 is a multicomponent site dating to the Middle Archaic through formative period overlain by historic homesteading and mining activity. Numerous features, diagnostic artifacts and an estimated 250,000 lithic flakes are documented within the boundary. Existing impacts from roads are well documented within the site boundary. Continued use of the existing roads as proposed will not affect the site. The BLM will require an archaeological monitor for any improvements to the existing road within the site boundary.
- The BLM has included the above measures, such as archaeological monitoring, other stipulations and project design features that the proponent has agreed to and must follow in order to avoid and minimize effects to historic properties.”

Thank you for providing the Ute Mountain Ute (UMU) Tribe the opportunity to review and respond to the above proposed project Velvet Wood Mine Plan Modification. We have determined, “NONCURRENCE” with this project due to some concerns listed below,

- When the uranium is extracted from the Velvet Wood Mine where is the uranium going to be relocated? Where is the designated location?
- Would there be any effect to current aquifers?
- Is there going to be a lining for the proposed water tank/reservoir after siphoning the water out of the mine to proceed with the project.
- Is the proposed water tank/ reservoir going to be fenced off?

We would like to consult with the POA, by phone calls, video calls, emails, in-person meetings, and site visits all based on weather conditions. You can contact Keely Yanito (UMU) THPO

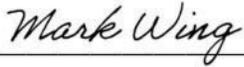
Program Managers, email: kyanito@utemountain.org, office phone: (970)238-6988, and Mark Wing UMU THPO Cultural Specialist, email: MWing@utemountain.org, Office Phone: (970)238-6792.

Ute Mountain Ute tribe appreciates your continued tribal engagement and consultation, and collaborations in protecting and preserving places of cultural resources importance.

If any cultural or human remains are encountered during the construction or implementation of this project work must immediately cease and notify the UMU THPO. Contact information: Office Phone (970)238-2988, or can be reached by email: kyanito@utemountain.org.

Sincerely,

Keely Yanito
Ute Mountain Ute (UMU)
Tribal Historic Preservation Office (THPO) Program Manager



Mark Wing
Ute Mountain Ute (UMU)
Tribal Historic Preservation Office (THPO) Culture Specialist

127 Hagen Road
San Felipe Pueblo, NM 87001



Phone: (505) 867-3381/3382
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Office of the Governor

May 16, 2025

The Honorable Doug Burgum
Secretary of the Interior
U.S. Department of the Interior
1849 C Street NW
Washington, DC 20240
Chairman Westerman and Ranking Member Huffman

RE: Strong Opposition to the Velvet-Wood Uranium Mine “Energy Emergency” Permitting Process

Dear Secretary Burgum:

On behalf of the Pueblo of San Felipe, I write to express our unequivocal opposition to the Interior Department’s decision to fast-track the environmental permitting process for the proposed Velvet-Wood uranium mine project in San Juan County, Utah.

This deeply flawed decision—executed under the false pretense of an “energy emergency”—not only threatens irreplaceable cultural and environmental resources but also undermines decades of federal law, policy, and trust responsibilities owed to Tribal Nations. That this action is being justified as part of a national energy strategy while advancing the interests of a Canadian-owned company mining U.S. public lands royalty-free under the 1872 Mining Law is both outrageous and indefensible.

The site of the proposed mine lies within proximity to Bears Ears National Monument, a landscape of profound cultural, spiritual, and historical significance to our Pueblo and many other Tribal Nations. The project’s rushed environmental review—limited to just 7-14 days—fails to meet even the most basic standards of environmental due diligence or federal consultation obligations under the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA).

We are gravely concerned by the following:

- Dewatering of the mine site will release contaminated water into culturally sensitive areas, including downstream ecosystems held sacred by our people.

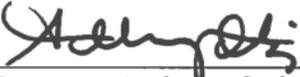
- Hauling uranium ore through the Bears Ears region increases the risk of environmental contamination and desecration of sacred lands, while inexplicably bypassing the nearby operational White Mesa uranium mill in favor of a historically defunct facility in Ticaboo.
- The complete absence of tribal consultation in this process is a direct violation of both the spirit and the letter of the federal trust responsibility.

Let us be clear: uranium mining on lands of deep cultural and spiritual importance to Tribal Nations—especially under such reckless and politically motivated conditions—represents a grave threat to our heritage, public health, and sovereignty. Fast-tracking this process not only deprives Tribal Nations of their legal right to consultation, it betrays the very foundation of trust upon which our government-to-government relationship is built.

We call on the Department of the Interior to immediately suspend the expedited review of the Velvet-Wood uranium mine, initiate formal consultation with impacted Tribal Nations, and commit to a full environmental and cultural review as required under federal law.

The Pueblo of San Felipe will continue to oppose this project in every available forum. We urge you to reverse course before irreparable harm is done—not only to the land, but to the federal government’s standing with the Tribal Nations it is bound to protect.

Sincerely,



 Governor Anthony Ortiz
 Pueblo of San Felipe



 Lt. Governor James Tenorio
 Pueblo of San Felipe

cc:

- The Honorable Martin Heinrich
- The Honorable Ben Ray Luján
- The Honorable Teresa Leger Fernandez
- The Honorable Melanie Stansbury
- The Honorable Gabe Vasquez
- Bears Ears Inter-Tribal Coalition
- Advisory Council on Historic Preservation
- Cara MacDonald, Acting Assistant Secretary for Land and Minerals Management
- Jon Raby, Acting Director of BLM
- David Berry, Regional Director for the Western Regional Office, Office of Surface Mining Reclamation and Enforcement
- Matt Preston, Acting Utah State Director, BLM
- Melanie Barnes, New Mexico State Director, BLM
- BLM Monticello Field Office, Assistant Field Manager for Cultural and Planning

[EXTERNAL] RE: Velvet-Wood Mine Plan of Operations Notification

From Lopez, Fermin <FLopez@pojoaque.org>

Date Fri 5/16/2025 8:40 AM

To Lundell, Michael (Jared) <mlundell@blm.gov>

Cc Palma, Jacob E <jepalma@blm.gov>; Pefferman, Audrey R <apefferman@blm.gov>; Gaddis-Wyatt, Nicolle R <ngaddiswyatt@blm.gov>; Helton, Emilee J <ehelton@blm.gov>; Stephenson, Jill A <jstephenson@blm.gov>

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Good morning, Jared. I pray you are in good health and good spirits.

I am in receipt of your email request for consultation regarding the above-mentioned project.

Considering the length of time allotted for review of this project, The Pueblo of Pojoaque Tribal Historic Preservation Office will not have the opportunity to review the project in its entirety nor provide meaningful indigenous consultation to this project. Seven (7) days for review of any project including this one (we have great concerns about the lithic scatter and all sites within the mining area) should not be conducted in this manner and the Pueblos including any affiliated tribes should be given ample time to provide meaningful consultation regarding projects that have the potential to have a direct effect on our cultural sites. Indigenous community's cultural heritage is at stake when consultation is conducted in this manner and the amount of time given for this and future projects should be reconsidered by BLM and all associated Federal Departments.

Have a great day.

Thank You!

Fermin Lopez
Tribal Historic Preservation Officer
Pueblo of Pojoaque Historic Preservation Office
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From: Lundell, Michael (Jared) <mlundell@blm.gov>

Sent: Tuesday, May 13, 2025 2:57 PM

Cc: Palma, Jacob E <jepalma@blm.gov>; Pefferman, Audrey R <aeppefferman@blm.gov>; Gaddis-Wyatt, Nicollee R <ngaddiswyatt@blm.gov>; Helton, Emilee J <ehelton@blm.gov>; Stephenson, Jill A <jstephenson@blm.gov>

Subject: Velvet-Wood Mine Plan of Operations Notification

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Dear Tribal Leader,

Please see the attach letter for information and notification about the Velvet-Wood Mine plan of operations review and modification.



Jared Lundell

Assistant Field Manager for Cultural and Planning

Bureau of Land Management - Bears Ears National Monument

Monticello Field Office

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Phone (desk): 435-587-1535

email: mlundell@blm.gov

"I will support and defend the Constitution of the United States against all enemies foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the the duties of the office on which I am about to enter"