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February 17, 2012

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*77 FR 2096*

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RULES AND DIRECTIVES  
BRANCH  
D-1103

Cindy Bladey, Chief  
Rules, Announcements, and Directives Branch  
Division of Administrative Services, Office of Administration  
Mailstop TWB-05-B01M  
Washington DC 20555-0001

Re: International Isotopes Fluorine Products Facility, Draft Environmental Impact Statement; NMGF Project No. 14847

Dear Ms. Bladey:

In response to your letter dated January 4, 2012, the New Mexico Department of Game & Fish (NMGF) has reviewed the above referenced document. The proposed IIFP facility will deconvert depleted uranium hexafluoride into uranium oxide for long-term stable disposal. It will also produce, as a by-product, specialty fluoride gas products for sale to industrial markets. The decision being considered under the National Environmental Policy Act process is whether to issue a Nuclear Regulatory Commission license to possess, use, transfer, or deliver source and byproduct materials. The project is located in Lea County, approximately 14 miles west of Hobbs NM. NMGF previously provided scoping comments on this project in a letter dated June 21, 2011 (Project No. 13058).

NMGF concurs with the DEIS conclusion of small impact to ecological resources. We stand by the recommendations made in our scoping comment letter, many of which have been included as recommendations in the DEIS. Pre-construction clearing, grading, road-building and utility installation are treated as cumulative effects in the DEIS, because no NRC license is required. However these actions are logically integral to construction and operation of the facility. We recommend that, prior to initiating clearing and grading, pre-construction clearance surveys should be conducted for the following species of concern which may occur on the project site: lesser prairie-chicken, burrowing owl and swift fox. Please contact NMGF for specific information on survey methodology and timing.

*SONSI Review Complete*  
*Template = ADM-013*

*E-RID 5 = ADM-03*  
*Cell = A. Malliakos (acm1)*

Thank you for the opportunity to comment on this DEIS. If there are any questions, please contact Rachel Jankowitz at 505-476-8159, or [rjankowitz@state.nm.us](mailto:rjankowitz@state.nm.us).

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Wunder". The signature is fluid and cursive, with the first name "Matthew" being more prominent than the last name "Wunder".

Matthew Wunder, Chief  
Conservation Services Division

cc: USFWS NMES Field Office  
George Farmer, SE Area Habitat Specialist, NMGF