INDEX SHEET FOR PERMIT AMENDMENTS OR REVISIONS

MINE COMPANY NAME: Strata Energy, Inc. **MINE NAME:** Ross ISR Uranium Recovery Project **TFN 5 6/110**

SUBJECT: Preliminary Baseline Sampling Plan

Pages included for pagination purposes are not specifically noted below.

VOL. NO.	SECTION	PAGE, MAP OR OTHER PERMIT ENTRY TO BE REMOVED	PAGE, MAP OR OTHER PERMIT ENTRY TO BE ADDED	DESCRIPTION OF CHANGE
I	Cover	Cover	Cover	Updated Business Address (8/10)
I	TOC	iii	iii	Updated to show the addition of Appendices D and E. (5/10)
I	1	Pg 2	Pg 2	Updated Figure 1. Generalized Ore-Body Locations (8/10)
I	2	Pg 6	Pg 6	Updated Figure 2. Generalized Hydro-Stratigraphic Column (8/10)
I	5	Pg 15	Pg 15	Updated Table 1. Summary of Surface Water Monitoring Sites (8/10)
I	5	Pg 17	Pg 17	Updated Table 2. Surface Water/Groundwater Monitoring Constituents (8/10)
I	5	Pg 21	Pg 21	Updated text to show the addition of Appendix E. (5/10)
I	6	Pg 27	Pg 27	Updated Figure 4. Proposed Air Quality Monitoring Stations (8/10)
I	Appendices	Appendix C Drawing	Appendix C Drawing	Updated Appendix C Drawing, Proposed Well Installation Methods (8/10)
I	Appendices		Appendix D	Submitted separately. (5/10)
I	Appendices		Appendix E	Inserted Appendix E(5/10)
I	Exhibits	Exhibit 1	Exhibit 1	Updated Exhibit 1, General Location Map (810/)
I	Exhibits	Exhibit 4	Exhibit 4	Updated Exhibit 4, Proposed Surface Water Monitoring Locations (8/10)
I	Exhibits	Exhibit 5	Exhibit 5	Updated Exhibit 5, Groundwater Monitoring Well Cluster Locations and Completions (8/10)

WWC ENGINEERING
1849 Terra Avenue - Sheridan, WY 82801 - (307) 672-0761
Fax (307) 674-4265 - Email: infoshr@wwcengineering.com

May 20, 2010

Mr. Mark Taylor
Senior Analysist
Wyoming Department of Environmental Quality
1866 South Sheridan Avenue
Sheridan, WY 82801

RE: Comment Responses to Ross ISR Uranium Recovery Project Preliminary Baseline Sampling Plan – TFN 5 6/110

Mr. Taylor:

Enclosed, please find comment responses regarding the Ross ISR Uranium Recovery Project Preliminary Baseline Sampling Plan, a change index, and the affected pages.

Please contact me if you have questions regarding this revision to the preliminary baseline sampling plan.

Respectfully,

Ben Schiffer

Enclosures: as noted
K:\Peninsula_Minerals\09142\Strata\010 Pre-Op Sampling Plan\PreOp DEQ Letter_5_20_10.doc

DRAFT Appendix E

Aquifer Testing Work Plan (Ross Project)

COMMENT 1:

Introduction: The introductory paragraph (page 1) indicates aquifer testing may occur at as few as one of the six baseline monitoring well clusters, however the second paragraph seems to suggest the ore zone wells will be pumped at each of the well clusters. I recommend conducting aquifer testing at more than one well cluster, given, the likely variability in the hydrologic properties across the proposed mining area. However, should Strata opt to conduct these pump tests at only one well cluster, these tests should be performed at a well cluster nearest to the proposed mining centroid (i.e., well cluster 14-18 or 34-18).

RESPONSE 1:

Strata proposes to conduct the multi-well test for determination of horizontal and vertical anisotropy at the 12-18 cluster, because this cluster is located closest to where mining will be initiated. Additionally, less extensive aquifer testing will be conducted at each cluster. Appendix E text has been revised accordingly

COMMENT 2:

Well Completions: The three additional ore zone observation wells should be constructed at least 1.5 times the thickness of the aquifer away from the pumping well so that the vertical component becomes negligible. Any closer and the vertical component will give results that tend to be less than the actual aquifer parameters.

RESPONSE 2:

Because the ore zone pumping well is fully penetrating, the vertical flow component in the observation wells will be negligible. Further, it is Strata's intent to complete the observation wells in a partially penetrating fashion, then pump one of the observation wells in order to measure vertical anisotropy within the ore zone. If the observation wells are located too far from the partially penetrating pumping well, the vertical component becomes negligible, and the ratio of Kh to Kv is not measurable. (No text was revised in response to this comment)

COMMENT 3:

Pumping Test Program: What are the pressure ratings, limits of accuracy, and sensitivity of the pressure transducers to be used during the pump tests?

RESPONSE 3:

Pertinent transducer information has been added to Appendix E.

COMMENT 4:

4) Pumping Test Program: In addition to recording pressures during the pump tests, I recommend recording the groundwater levels (i.e., hydrostatic pressures) and corresponding barometric pressures for 3 days prior and 3 days after the pump test interval

RESPONSE 4:

Background water level and barometric data collection began (date). Data are collected continuously; background water level data are recorded on an hourly basis. During stress (sampling or testing) water level data are recorded by the minute. Barometric data are collected every hour. Continuous collection of water level and barometric pressure will continue until permit approval. Text to this effect has been added to Appendix E, Antecedent Conditions

COMMENT 5:

Test Discharge Rate and Duration: I assume each well will be pumped using a conventional electric submersible pump powered by a portable generator and the pumps will be set at or near the bottom of each well?

RESPONSE 5:

Each well is equipped with a dedicated submersible pump set 10 feet above the screen. Text to this effect has been added to this section.

COMMENT 6:

Test Procedures and Methods of Analysis: All raw pump test data should be submitted to LQD in a spreadsheet format (i.e., columns with time, pump rate, displacement {feet of drawdown}) which will easily import into the automated curve matching software (AGTESOLV) used by LQD.

RESPONSE 6:

Duly noted. Text to this effect has been added to the test procedures section

COMMENT 7:

Methods of Analysis: This text indicates the pumping test data will be analyzed using methods including “partial penetration” (i.e., Hantush {1964}). Given, all three methods of well completion shown on Appendix C illustrate full penetration it seems improper to use a “partial penetration” method.

RESPONSE 7:

As discussed in the response to comment 1. Partial penetration methods of analysis will be used to determine the ratio of vertical anisotropy in the ore zone.

INDEX SHEET FOR PERMIT AMENDMENTS OR REVISIONS

MINE COMPANY NAME: Strata Energy, Inc. **MINE NAME:** Ross ISR Uranium Recovery Project **TFN 5 6/110**

SUBJECT: Preliminary Baseline Sampling Plan

Pages included for pagination purposes are not specifically noted below.

VOL. NO.	SECTION	PAGE, MAP OR OTHER PERMIT ENTRY TO BE REMOVED	PAGE, MAP OR OTHER PERMIT ENTRY TO BE ADDED	DESCRIPTION OF CHANGE
I	TOC	iii	iii	Updated to show the addition of Appendices D and E.
I	CH 5	21	21	Updated text to show the addition of Appendix E.
I	Appendices		Appendix D	Submitted separately.
I	Appendices		Appendix E	

WWC ENGINEERING
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May 11, 2010

Larry Barbula
Senior Analyst
Wyoming Department of Environmental Quality
1866 South Sheridan Avenue
Sheridan, WY 82801

RE: Minor Revision to ISR Uranium Recovery Project Preliminary Baseline Sampling Plan – TFN 5 6/110: Removal of Precipitation Gage at P-1

Mr. Barbula:

Per my conversation with you on May 10, 2010, WWC will be making a slight change to the Preliminary Baseline Sampling Plan for the Ross ISR Uranium Project. WWC will not install the precipitation gage at site P-1, which was to be associated with the upstream surface water monitoring station SW-2 (Table 1). This revision will not eliminate the precipitation monitoring for SW-2 but would relocate it to an existing gage at the air quality metrological monitoring site (Met-Upwind) located approximately 1.5 miles north of SW-2 (Figure 1). As you are aware, the original intent of P-1 was to collect precipitation data that could be correlated with surface flows at SW-2. These data can be obtained at the nearby Met-Upwind without a loss of site specific data and Met-Upwind has the added benefit of being capable of collecting precipitation data year round.

Please contact me if you have questions regarding this revision to the preliminary baseline sampling plan.

Respectfully,

John Berry,

jdb

Enclosures: as noted

cc: Tony Simpson
Ben Schiffer, WWC Engineering

K:\Peninsula_Minerals\09142\Strata\010 Pre-Op Sampling Plan\PreOp WWC Cover Letter_01_20_10.doc

Table 1. Summary of Surface Water Monitoring Sites

Site I.D.	Facility Name	Location	Monitoring Devices	Type and Frequency of Measurements
SW-1	Little Missouri River - Downstream	SESE, Sec. 7, T53, R67	R, C, S, PS	R, C, S, G
SW-2	Little Missouri River - Upstream	SENW, Sec. 24,T53, R68	R, C, S, PS, ~~P~~	R, C, S, ~~P,~~ G
SW-3	Deadman Creek	NESW, Sec. 13,T53, R68	R, C, S, PS	R, C, S, G
~~P-1~~	~~Little Missouri River - Upstream~~	~~SENW, Sec. 24,T53, R68~~	~~P~~	~~P~~
R-1	TW RES 01	SESE, Sec. 7,T53, R67	None	G
R-2	Oshoto Reservoir	SWNE, Sec. 18,T53, R67	None	G
R-3	CS RES 03	SESE, Sec. 18,T53, R67	None	G
R-4	CS RES 04	SESE, Sec. 18,T53, R67	None	G
R-5	CS RES 02	SWNE, Sec. 19, T53, R67	None	G
R-6	P15506S	NWNW, Sec. 19, T53, R67	None	G
R-7	P17592S	SWSW, Sec. 18, T53, R67	None	G
R-8	P15508S	NESE, Sec. 13, T53, R68	None	G
R-9	P15507S	NWSE, Sec. 13, T53, R68	None	G
R-10	Unknown	NWSE, Sec. 13, T53, R68	None	G
R-11	Unknown	NESW, Sec. 13, T53, R68	None	G

Monitoring Devices
R = Continuous stage recorder
C = Crest-stage gage
S = Staff gage
PS = Pump sampler
P = Rain gage

Type and Frequency of Measurements
R = Continuous stage recorder and pump sampler water quality sample on event basis
C = Crest stage gage measurement (monthly)
S = Staff gage measurement (monthly)
~~P = Continuous rainfall data~~
G = Grab sample (quarterly)

Note: Continuous stage recorders, pump samplers, and rain gages inactive from first hard freeze or October 1, whichever is first, through approximately April 30, weather permitting.

Comment Responses
Ross Project Baseline Sampling Plan– TFN 5 6/110

Mark Taylor's Comments:

Comment 1: What are the tentative dates of the upcoming quarterly meetings?

Response 1: The tentative dates of quarterly meetings are: 2nd week of February, 1st week of October with an application submittal in December 2010.

Comment 2: Appendix B: Please provide all water quality and monitoring well information in the format provided on LQD's Uranium Mining Data Submission Spreadsheets (ref: http://deq.state.wy.us/lqd/Uranium_Data).

Response 2: The Appendix B form has been revised to indicate that it is a field form. Text on pages 16, 18, and 20 was revised to indicate that water quality analysis results will be provided in a format consistent with the above mentioned WDEQ format.

Comment 3: Strata should provide Wyoming Public Lands and BLM a "heads-up" on this project.

Response 3: Strata has met with the BLM about this project both nationally and at the state level. WWC anticipates meeting with the State Land Board in early February.

Comment 4: Pages 9 & 10: Why are you citing Coal Rules & Regulations?

Response 4: Pages 9 & 10 have been revised to remove the reference to Coal Rules and Regulations and to cite Noncoal Rules and Regulations.

Comment 5: Page 18, Groundwater Hydrology: Strata must provide a list and a map of all groundwater rights within three (3) miles of the permit boundary.

Response 5: Text was added to page 18 stating that a map and list will be provided with the required information.

Comment 6: Strata must provide discussion concerning the historical uses of groundwater within and adjacent to the permit boundary.

Response 6: Text has been added to page 18 stating that a discussion of the historical uses of groundwater will be provided.

Comment 7: Page 18, The plan should discuss water quality sampling frequency and duration.

Response 7: Text was added to page 20 stating that water quality samples will be collected on a quarterly basis for four quarters to determine baseline values.

Comment 8: Table 2: For clarity the title should be changed to include "groundwater".

Response 8: The title of Table 2 was revised to read Surface/Ground Water Monitoring Constituents.

Comment 9: Page 21: Strata should commit to submitting aquifer test plans for LQD and NRC review and input prior to installing any additional wells or conducting any pumping.

Response 9: Text was added to page 21 stating that aquifer test plans will be submitted to LQD and NRC prior to installing any additional wells or conducting any pumping.

Comment 10: Page 24: Strata needs to discuss any air quality monitoring plans directly with AQD and send LQD a copy of agreements reached.

Response 10: Text was added to page 24 stating that Strata will discuss the air quality monitoring plans with AQD.

Comment 11: Page 29 (bottom): Why are you citing Coal Rules and Regulations?

Response 11: Page 30 have been revised to remove the reference to Coal Rules and Regulations and to cite Noncoal Rules and Regulations.

Comment 12: Page 29, Cultural Resources: Strata must contact SHPO directly concerning their plans and send a copy of any agreements to LQD.

Response 12: Text was added to page 30 stating that SHPO will be contacted directly to discuss the monitoring plan and any agreements will be submitted to LQD.

Comment 13: Page 45, Wetlands: Strata must contact ACOE directly concerning their plans and send a copy of any agreements to LQD.

Response 13: Text was added to page 47 stating that Strata will contact ACOE to discuss the effects of the Ross Project on wetlands and any agreement will be submitted to LQD.

Comment 14: Page 48, Wildlife: Strata must contact WGFD directly concerning their plans and send a copy of any agreements to LQD.

Response 14: Text was added to page 50 stating that Strata will contact WGFD to discuss the effects of the Ross Project on wildlife species and any agreement will be submitted to LQD.

Larry Barbula's Comments:

Comment 1: It is inferred that the surface water gauging sites include water quality sampling equipment. Will water quality be sampled at the surface water gauge sites? If so please state that fact directly in the sampling plan. If sampling is not intended at the gauge site it should be, especially at the downstream station.

Response 1: Text on page 16 was revised to indicate that the monitoring devices and monitoring frequency at the surface water gauge sites are included in Table 1.

Comment 2: Surface water quality should be sampled all 4 quarters of the year to account for any seasonal variation, even if the flow gauge sites are shut down due to freeze-up. Samples are usually available even if the surface is frozen. Please add a commitment to sample surface water during all 4 quarters of water is present.

Response 2: Page 15 (Table 1) was revised to indicate that grab samples would be taken quarterly. The table indicates a quarterly monitoring frequency for surface water sites.

Stacy Page's Comments:

Comment 1: Please submit a map of the proposed permit area with the vegetation communities mapped 0.5 miles surrounding the proposed permit boundary.

Response 1: Text has been added to page 42 stating that a map showing the vegetation communities within the proposed permit boundary as well as 0.5 miles surrounding the proposed permit boundary will be submitted.

Comment 2: Please submit a table with the acreages of each vegetation community in the proposed permit area.

Response 2: Text has been to page 42 stating that a table will be submitted with the acreages of each vegetation community.

Comment 3: Please state that sampling will be done between the beginning of June and the end of July and once started will be completed in a three week period.

Response 3: Text was added to page 43 stating that the sampling will be conducted between the beginning of June and the end of July and once started will be completed in a three week period.

Comment 4: Please state that cover sampling will be done for each vegetation community unless there is a crop or Hayland community.

Response 4: Text was added to page 43 stating that cover sampling will be done for each vegetation community unless there is a crop or Hayland community.

Comment 5: Please state that photos will be taken of each community.

Response 5: Text was added to page 42 stating that photos will be taken of each community.

Comment 6: Please state that the photo locations and transect locations will be shown on the map submitted with the Appendix D-8 Vegetation Baseline.

Response 6: Text was added to page 42 that the photo locations and transect locations will be shown on the map submitted with the Appendix D-8 Vegetation Baseline.

Subject: DRAFT App. E Aquifer Testing Work Plan - TFN 5 6/110
From: "Taylor, Mark" <mtaylo@wyo.gov>
Date: 4/21/2010 10:25 AM
To: "Ray Moores" <rmoores@wwcengineering.com>, "Ben Schiffer " <bschiffer@wwcengineering.com>
CC: "Rogaczewski, Mark" <mrogac@wyo.gov>

Ben & Ray: see my comment and questions below:

DRAFT Appendix E

Aquifer Testing Work Plan (Ross Project)

My comments/questions:

1) Introduction: The introductory paragraph (page 1) indicates aquifer testing may occur at as few as one of the six baseline monitoring well clusters, however the second paragraph seems to suggest the ore zone wells will be pumped at each of the well clusters. I recommend conducting aquifer testing at more than one well cluster, given, the likely variability in the hydrologic properties across the proposed mining area. However, should Strata opt to conduct these pump tests at only one well cluster, these tests should be performed at a well cluster nearest to the proposed mining centroid (i.e., well cluster 14-18 or 34-18).

2) Well Completions: The three additional ore zone observation wells should be constructed at least 1.5 times the thickness of the aquifer away from the pumping well so that the vertical component becomes negligible. Any closer and the vertical component will give results that tend to be less than the actual aquifer parameters.

3) Pumping Test Program: What are the pressure ratings, limits of accuracy, and sensitivity of the pressure transducers to be used during the pump tests?

4) Pumping Test Program: In addition to recording pressures during the pump tests, I recommend recording the groundwater levels (i.e., hydrostatic pressures) and corresponding barometric pressures for 3 days prior and 3 days after the pump test interval?

5) Test Discharge Rate and Duration: I assume each well will be pumped using a conventional electric submersible pump powered by a portable generator and the pumps will be set at or near the bottom of each well?

6) Test Procedures and Methods of Analysis: All raw pump test data should be submitted to LQD in a spreadsheet format (i.e., columns with time, pump rate, displacement {feet of drawdown}) which will easily import into the automated curve matching software (AGTESOLV) used by LQD.

7) Methods of Analysis: This text indicates the pumping test data will be analyzed using methods including “partial penetration” (i.e., Hantush {1964}). Given, all three methods of well completion shown on Appendix C illustrate full penetration it seems improper to use a “partial penetration” method.

MDT_4_21_2010

Mark Taylor, PG
Groundwater Project Geologist
Land Quality Division, District 3
Wyoming Department of Environmental Quality
1866 South Sheridan Ave., Sheridan WY 82801
307-673-9337
mtaylo@wyo.gov

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Subject: Vegetation Sampling for Ross ISR Uranium, STRATA ENERGY, TFN5 6/110
From: "Page, Stacy" <spage@wyo.gov>
Date: 12/3/2009 2:42 PM
To: "Bschiffer@WWCEngineering.com" <Bschiffer@WWCEngineering.com>
CC: "Taylor, Mark" <mtaylo@wyo.gov>

Ben,
The methodology for the sampling plan Section 9.0 is fine however there are some specifics that I require prior to approving the sampling plan for the area. The specifics listed below should be submitted at least a month before you actually begin sampling so that there is time for my review. This would mean submitting in early May.

1. Please submit a map of the proposed permit area with the vegetation communities mapped .5 mile surrounding the proposed permit boundary.
2. Please submit a table with the acreages of each vegetation community in the proposed permit area.
3. Please state that sampling will be done between the beginning of June and the end of July and once started will be completed in a three week period.
4. Please state that cover sampling will be done for each vegetation community unless there is a crop or hayland community.
5. Please state that photos will be taken of each community.
6. Please state that the photo locations and transect locations will be shown on the map submitted with the Appendix D-8 Vegetation Baseline.

If you have questions please call me at 673-9337 or email me.

Sincerely,

Stacy Page

E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.

Subject: Ross Project - TFN 5/6/110
From: "Taylor, Mark" <mtaylo@wyo.gov>
Date: 12/1/2009 1:30 PM
To: "Bschiffer@WWCEngineering.com" <Bschiffer@WWCEngineering.com>
CC: "Rogaczewski, Mark" <mrogac@wyo.gov>

Ben:

I have completed my review of the preliminary baseline sampling plan submitted under your letter of 11/3/2009. The following are my questions and comments:

1) What are the tentative dates of the upcoming quarterly meetings?
2) Appendix B: Please provide all water quality and monitoring well information in the format provided on LQD's Uranium Mining Data Submission Spreadsheets (ref: http://deq.state.wy.us/lqd/Uranium_Data).
3) Strata should provide Wyoming Public Lands and BLM a "heads-up" on this project.
4) Pages 9 &10: Why are you citing Coal Rules & Regulations?
5) Page 18, Groundwater Hydrology: Strata must provide a list and a map of all groundwater rights within three (3) miles of the permit boundary.
6) Strata must provide discussion concerning the historical uses of groundwater within and adjacent to the permit boundary.
7) Page 18, The plan should discuss water quality sampling frequency and duration.
8) Table 2: For clarity the title should be changed to include "groundwater".
9) Page 21: Strata should commit to submitting aquifer test plans for LQD and NRC review and input prior to installing any additional wells or conducting any pumping.
10) Page 24: Strata needs to discuss any air quality monitoring plans directly with AQD and send LQD and a copy of agreements reached.
11) Page 29 (bottom): Why are you citing Coal Rules & Regulations?
12) Page 29, Cultural Resources: Strata must contact SHPO directly concerning their plans and send a copy of any agreements to LQD.
13) Page 45, Wetlands: Strata must contact ACOE directly concerning their plans and send a copy of any agreements to LQD.
14) Page 48, Wildlife: Strata must contact WGFD directly concerning their plans and send a copy of any agreements to LQD.
15) I am aware that Larry Barbula has already sent you his comments…you could also anticipate receiving comments from Stacy Page in the near future.

Mark Taylor, PG
Groundwater Geologist
Land Quality Division, District 3
Wyoming Department of Environmental Quality
1866 South Sheridan Ave., Sheridan WY 82801
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Subject: Ross ISL (TFN 5/6/110) Preliminary Baseline Sampling Plan
From: "Taylor, Mark" <mtaylo@wyo.gov>
Date: 11/18/2009 8:26 AM
To: "Page, Stacy" <spage@wyo.gov>, "Sweet, Jonathan" <jsweet@wyo.gov>, "Mooney, Glenn" <gmoone@wyo.gov>
CC: "Rogaczewski, Mark" <mrogac@wyo.gov>, "Barbula, Larry" <lbarbu@wyo.gov>, "Bschiffer@WWCEngineering.com" <Bschiffer@WWCEngineering.com>

Stacy (Vegetation), Jon (Soils), Glenn (General Completeness & Geology):

Ben Schiffer's letter of November 3, 2009 requests LQD's review of this preliminary baseline sampling plan. Looking at the correspondence letter "sign-off" it shows all of you have had a chance to review this plan. Please email Mr. Schiifer directly at Bschiffer@WWCEngineering.com and CC me whether or not (please specify any deficiencies) you feel this preliminary monitoring plan will fulfill your baseline portions of the WDEQ requirements for a ISL application. Thanks.

Mark Taylor, PG
Groundwater Geologist
Land Quality Division, District 3
Wyoming Department of Environmental Quality
1866 South Sheridan Ave., Sheridan WY 82801
307-673-9337
mtaylo@wyo.gov

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Subject: TFN 5/6/110 Ross ISL Project
From: "Taylor, Mark" <mtaylo@wyo.gov>
Date: 11/12/2009 9:51 AM
To: "Ben Schiffer" <bschiffer@wwcengineering.com>, "Tony Simpson " <tsimpson@peninsulaminerals.com.au>

Gentlemen:

This project has been designated temporary file number (**TFN 5/6/110**). To assist our records keeping please begin using this designation on all future correspondence. Thanks

Mark Taylor, PG
Groundwater Geologist
Land Quality Division, District 3
Wyoming Department of Environmental Quality
1866 South Sheridan Ave., Sheridan WY 82801
307-673-9337
mtaylo@wyo.gov

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