



GARY E. JOHNSON  
GOVERNOR

STATE OF NEW MEXICO  
**OFFICE OF CULTURAL AFFAIRS**  
**HISTORIC PRESERVATION DIVISION**

VILLA RIVERA BUILDING  
228 EAST PALACE AVENUE  
SANTA FE, NEW MEXICO 87501  
(505) 827-6320

3 June 1998

Joseph J. Holonich, Chief  
Uranium Recovery Branch  
Division of Waste Management  
Office of Nuclear Material Safety and Safeguards  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

Dear Mr. Holonich:

This is in response to your letter of 20 May 1998, received by this office 27 May 1998, which made recommendations about site eligibility based on opinions offered by the Museum of New Mexico, Office of Archaeological Studies (OAS), in their survey report for the Hydro Resources, Inc. (HRI) leach uranium mining facility proposed near Crownpoint, New Mexico (Archaeology Notes 214). Your letter also recommends a finding of "no effect" for the proposed mining activities.

Forty-one archaeological sites were found in Sections 8 (T16N, R16W) and 12 (T17N, R13W). No archaeological sites were found in Section 17 (T16N, R16W). My previous letter of 20 November 1997 supported the recommendations put forward by OAS, but included five sites on BLM land (LA 116116, 116117, 116119, 116121, and 117317) and one site on private land (LA 116129) whose eligibility cannot be determined with current information. Under National Historic Preservation Act definitions, these six sites are not technically "historic properties" as they are not definitively eligible for listing in the National Register of Historic Places.

Point 2 on page two of your letter states that "All eligible and potentially eligible historic properties on Sections 8 and 12 would be fenced, as necessary, to preclude intrusion during any construction, mining, or other ground-disturbing activity." This wording would appear to include sites LA 116116, 116117, 116119, 116121, 116129, and 117317 whose eligibility remains undetermined without additional information. If HRI intends to avoid these six sites and protect them with fencing, their eligibility can remain undetermined. If HRI cannot avoid these six sites, or if mining plans change, determining eligibility becomes a point still in need of resolution.

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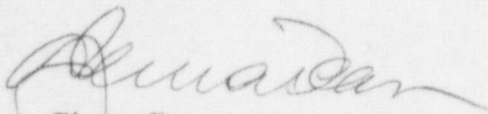
This office recommends that the eligibility of sites LA 116116, 116117, 116119, 116121, 116129, and 117317 be determined. Failing that, this office concurs that the project will have no effect on these six sites provided they are also fenced and avoided by construction, mining, or other ground-disturbing activities.

This office concurs that the proposed mining project will have no effect on the following eligible archeological sites, provided they are fenced and avoided by construction, mining, or other ground-disturbing activities:

LA 26158	LA 88875	LA 116123
LA 26159	LA 88876	LA 116124
LA 26160	LA 88877	LA 116125
LA 26162	LA 88878	LA 116126
LA 26163	LA 116111	LA 116127
LA 26164	LA 116112	LA 116128
LA 70610	LA 116114	LA 116130
LA 88871	LA 116115	LA 117314
LA 88872	LA 116118	LA 117316
LA 88873	LA 116120	LA 117319
LA 88874	LA 116122	

Please contact me with any questions you might have on these comments.

Sincerely,



Glenna Dean  
State Archaeologist

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