EXHIBIT G

UTE MOUNTAIN UTE TRIBE
ENVIRONMENTAL PROGRAMS DEPARTMENT

Exhibit G to December 16, 2011 Comments on DUSA RML Renewal
Re: Ute Mountain Ute Tribe Environmental Programs Department Review of "Nitrate Corrective Action Plan for the White Mesa Mill Site- Docket No. UGW09-03-A and Amended Stipulated Consent Agreement Executed September 30, 2011"

The report,"Nitrate Corrective Action Plan for the White Mesa Mill Site- Docket No. UGW09-03-A and Amended Stipulated Consent Agreement Executed September 30, 2011" (CAP) was submitted by Denison Mines (USA) Corp. (DUSA) on November 29, 2011 to the Utah Division of Radiation Control (DRC) as required under the Amended Stipulated Consent Agreement Executed September 30, 2011 between DUSA and DRC to address nitrate + nitrite (hereinafter referred to as "nitrate") contamination in the groundwater beneath the White Mesa Uranium Mill (the "site" or the "mill"), located near the Ute Mountain Ute Community of White Mesa, San Juan County Utah. The CAP was prepared for DUSA by its private contractor Hydro Geo Chem, Inc (HGM) based out of Tucson, Arizona.

Nitrate contamination at the site was first detected in 1999 in wells that were installed to address a different contaminant plume on the site, chloroform. Pumping of chloroform contaminated water began in 2003 and continues to the present day under White Mesa Uranium Mill: Notice of Violation and Groundwater Corrective Action Order, Docket No. UGW20-01.

In a letter dated December 1, 2009, DRC Co-Executive Secretary of the Utah Water Quality Board (the "Executive Secretary") recommended that DUSA also address and explain elevated chloride concentrations contaminating the groundwater at the site along with the nitrate pollution. DUSA's CAP is required to meet Utah State requirements specified in the Utah Administrative Code Rule, R317- 6-6.15.D.

This review has found the CAP to be deficient under the requirements of R-317-6-6.15.D-E. *See* R-317-6-6.15.E.2.a, requiring the CAP "To be protective of the public health and the environment;" R-317-6-6.15.E.4a, "Action shall Produce a Permanent Effect;" and R-317-6-6.15.E.4b, "any cap or other method of source control shall be designed so that the discharge from the source following corrective action achieves groundwater quality standards or, if approved by the Board, alternate corrective action concentration limits (ACACLs)."

Specific deficiencies in the CAP under Utah Administrative Code (UAC) are detailed below following a brief description of the CAP.

The CAP describes three phases of action. Phase one (source control) and Phase two (remediation) are addressed in the CAP. Phase three (a long term solution) is defined but is not covered in detail. DUSA proposes a separate CAP for phase three if DRC deems it necessary.

1. DUSA Proposed Corrective Actions

Phase One: DUSA proposes to delineate the physical extent of soil contamination around the ammonium sulfate chemical tanks and estimate the volume of contaminated soil, cover the area with concrete, and move this volume of contaminated soil to the tailings impoundments at closure of the facility. DUSA proposes to update the surety estimate to cover this activity.

Phase Two: DUSA proposes pumping from four wells in an attempt to hydraulically control the nitrate plume to actively remove pollutant mass (or cycle it) and passively count on "natural attenuation.," This is essentially waiting and hoping that environmental cycles diminish the pollution over time.

Phase Three: DUSA describes possibilities of continuing phase one and/or phase two activities with additional monitoring, evaluation and the possibility of additional remediation "as necessary." DUSA also raises the possibility of petitioning DRC to allow alternate corrective action concentration limits, which would raise the legal criteria for nitrate and chloride concentrations levels in groundwater.

2. CAP Deficiencies

This CAP negligently considers ammonium sulfate tanks as the sole source of potential nitrate contamination and does not identify any additional source for the chloride pollution. DUSA's failure to seriously assess the tailings cells as a potential source for the nitrate and chloride contamination is scientifically unsupportable, as is DRC's lack of resolve to require this analysis. The failure to address this issue puts the health and safety of the public, UMU Tribal members, and the environment at risk of substantial long term risks and fails to protect both in violation of R317-6-6.15E2. If the tailings cells are the source of the contamination, the nitrate and chloride currently in the groundwater are the leading indicators of a pollutant plume that may contain radionuclides, heavy metals and volatile organic chemicals that will persist in the environment for many generations, constituting an incalculable risk.

DUSA dismisses the most likely source of groundwater pollution on-site, the tailings cells. DUSA states that the hydrologic travel times through the shallow aquifer would not have allowed leakage from the tailings to travel far enough from the source to cause the current extent of pollution and that the amount of leakage necessary to result in the current contamination would generate a groundwater mound that would be approximately five feet high under the tailings.

First, travel times for groundwater through the shallow aquifer are uncertain regarding vertical and horizontal groundwater travel times and hydrologic conductivity in the shallow aquifer. DUSA has calculated travel times ranging from 0.22 ft/yr to 123 ft/yr (TABLE 3 Estimated Hydraulic Conductivities and Perched Zone Pore Velocities, Nitrate Investigation

Report, December 30, 2009). This same report states that DUSA believes it is possible that contamination may have moved 2,100 feet in 26 years, an average of 88 feet per year. However, in the "Nitrate Investigation Report, December 2009, DUSA stated that leakage from the tailings could not have migrated 1,000 feet.

DUSA states in the CAP that the ammonium sulfate tanks are the one remaining potential source of the nitrate pollution in the groundwater (page 1, CAP). Why would pollution sourced from soils beneath the ammonium sulfate tanks be able to travel through the shallow aquifer to a great spatial extent while this would be impossible for pollution from the tailings? With measurable chloride and nitrate groundwater pollution in tandem, and both chloride and nitrate solutions in the tailings, it is unacceptable to assume the source potential of these contaminants in the CAP be from the ammonium sulfate tanks, which does not include a source potential for chloride contamination.

DUSA also states that the amount of leakage from the tailings necessary to cause the nitrate pollution would generate a groundwater mound five feet high. There is no evidence of this. Of course, it is impossible to know if a mound this size exists because the current groundwater monitoring network is not sophisticated enough to detect groundwater mounding of this magnitude. Mounding around the wildlife ponds is detected at a resolution of ten feet.

The University of Utah's isotopic report (Utah Division of Radiation Control Summary of work completed, data results, interpretations and recommendations For the July 2007 Sampling Event At the Denison Mines, USA, White Mesa Uranium Mill Near Blanding, Utah Prepared by T. Grant Hurst and D. Kip Solomon Department of Geology and Geophysics University of Utah Submitted May 2008) is inappropriately used to dismiss the tailings as a potential source of the nitrate and groundwater contamination. However, the report concluded that groundwater flow in the shallow aquifer is active and only sampled two wells that are at the far southern boundary of the nitrate contamination (MW-30 and MW-31). Why didn't DUSA offer to repeat the isotopic sampling methods used in the University of Utah study with samples from wells at the epicenters of the contamination such as TW4-24 or TWN-2?

Additionally, phase two of the CAP proposes pumping contaminated water into the tailings cells. As outlined above, it is the Tribe's opinion that the tailings have not been seriously assessed as the source of the pollution, and placing contaminated material there may well result in further contamination of the aquifer and greater endangerment to public and environmental health. The Tribe has detailed specific and substantial concerns regarding the status of the liners and the inadequate leak detection systems (LDS) for the tailings cells. *See* Comment Letter Section III(A).

The proposed pumping and resulting hydrologic changes to the shallow aquifer may mask leakage from unaddressed actual sources of contamination, such as the tailings cells. If the pumping network hydraulically captures and alters contaminant plumes originating from the tailings cells this could result in false negative results in the point of compliance well network. Consequently leakage could remain undetected into the future leaving a contamination problem will be impossible or at the least very expensive and complicated to clean up; this is a serious potential situation that puts public and environmental health at risk.

It also appears that neither of the proposed phases in the CAP will produce a permanent effect (R317-6-6.15.E.4a.) since DUSA has not been required to adequately identify or address the tailings as a logical source of the nitrate contamination and has not identified a source of the chloride pollution at all. In fact, page 23 of the CAP states, “actual sources have not been identified and quantified.”

Also, the CAP is not designed so that the discharge from the source following corrective action achieves groundwater quality standards (R317-6-6.15.E.4.b.) in any reasonable amount of time. The corrective action concentration limit for nitrate is 10 mg/L, and relying on natural attenuation for remediation of an unidentified source without control will not achieve compliance with groundwater quality standards.