



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

March 5, 2021

Daniel Pollock
Grand Island Resources, LLC
4415 Caribou Rd
P.O. Box 3395
Nederland, CO 80466

RE: Cross Gold Mine, Permit No. M-1977-410, Comment Received on 110(2) Hard Rock Permit Amendment Application (AM-02)

Mr. Pollock:

On March 5, 2021, the Division of Reclamation, Mining and Safety (Division) received a comment letter from Boulder County Community Planning and Permitting (see enclosed) on your Amendment Application (AM-02). Please review the enclosed comment letter and inform the Division how the operator intends to address any issues detailed in the letter. This response may be included with your response to the Division's February 24, 2021 preliminary adequacy review.

If you have any questions, you may contact me by telephone at 303-866-3567, ext. 8129, or by email at amy.eschberger@state.co.us.

Sincerely,

Amy Eschberger
Environmental Protection Specialist

Encl: Comment letter from Boulder County Community Planning and Permitting, received on March 5, 2021

Cc: Richard Mittasch, Grand Island Resources, LLC
Michael Cunningham, DRMS



STATE OF
COLORADO

Eschberger - DNR, Amy <amy.eschberger@state.co.us>

Cross Gold Mine 4415 Caribou Road M-1977-410 AM-2

Rounds, Jesse <jrounds@bouldercounty.org>

Fri, Mar 5, 2021 at 12:20 PM

To: "amy.eschberger@state.co.us" <amy.eschberger@state.co.us>, "Sanchez, Kimberly" <ksanchez@bouldercounty.org>, "Sandoval, Kathy" <ksandoval@bouldercounty.org>, "Harden, Dyan" <dharden@bouldercounty.org>

Amy,

Attached, please find Boulder County's comment on the proposed modifications to operations at the Cross Gold Mine.

These comments were originally prepared by Kathy Sandoval and based on information you provided along with information obtained during a zoning violation investigation carried out by Dyan Harden and Kim Sanchez.

It appears that while some of the work contemplated by Grand Island Resources may be covered by the existing Special Use Development Agreement with Boulder County, a significant number of changes are proposed and Grand Island must submit a Modification Request to our department which will begin a determination of the appropriate process for local review of the proposed changes.

Sincerely,

Jesse

Jesse Rounds, Planning Manager for Code Compliance & Public Information*Work Schedule: M-Th 7 am – 5:30 pm*

Boulder County Community Planning & Permitting

2045 13th St., Boulder CO 80302 | Mailing address: PO Box 471 Boulder CO 80306

Direct: 303-441-3984 | Main: 303-441-3930

jrounds@bouldercounty.orgwww.BoulderCounty.org

Pronouns: he, him, his

Due to COVID-19, the Boulder County Community Planning & Permitting Department is conducting business and providing services virtually. Our physical office in Boulder is currently closed to the public. Please visit us online at <https://www.boco.org/cpp> for more information.

**Comment on AM-2 for Cross Gold Mine.docx**



Community Planning & Permitting

Courthouse Annex • 2045 13th Street • Boulder, Colorado 80302 • Tel: 303.441.3930

March 5, 2021

Amy Eschberger
Environmental Protection Specialist
Colorado Division of Reclamation, Mining, and Safety
1313 Sherman St
Room 215
Denver, CO 80203

RE: M-1977-410 AM-2

Dear Ms. Eschberger:

Boulder County Community Planning and Permitting (CPP) completed a review of AM-2 the modification of the Cross Gold Mine's permit with the Division of Mining, Reclamation and Safety. The proposal constitutes a modification of the existing SU-08-0006 approval between the mine's owners and Boulder County. Prior to any action that goes beyond the scope of the Development Agreement, Grand Island Resources must submit a Modification Determination request to Boulder County Community Planning & Permitting in order to determine the scale of the modifications proposed and what type of modification process will be required for the work to comply with the Boulder County Land Use Code.

In the existing Development Agreement for the Cross Mine, the Special Use recognized the existing mining use, approved the expansion of the operations which included a new mine tunnel, underground mine workings, construction and operation of a new onsite ore-processing facility, construction of a new ore storage building, development of a new internal access road, and other site improvements.

The following items do not appear to be contemplated in the Development Agreement and must be assessed as part of the Modification Determination:

- The new office and dry room at the Cross Mine site
- Grading and shoring of the Idaho Tunnel may need to be reviewed
- New waste rock storage may exceed the existing agreement limits

The addition of the new interior road from Cross Mine to Caribou Mine was noted in SU-08-0006, the new office building (1,710 sf) was not listed in the SU at this location and was referred to as the Ore Storage Building. It's unclear if this is the same building. The addition of a new waste rock pile by the warehouse at the Cross Warehouse was not listed in SU-08-0006. The waste rock dump was noted by the Caribou parking area.

Deb Gardner *County Commissioner*

Elise Jones *County Commissioner*

Matt Jones *County Commissioner*

The operator Grand Island Resources also notes in their letter that they want to convert their 110-mining permit to a 112 permit. DRMS noted in their correspondence to CPP that they believe it is related to giving them more workable space within the permit area, as the 9.9 acre limitation of the 110 permit doesn't give them a lot of room to operate without disturbing land off site. In addition, they want to construct a mill on site and that would require them to convert the 110 permits to a Designated Mining Operation (DMO). Per Resolution 2008-125, the extraction of ores at the Cross Mine shall be limited to 70,000 tons per year, as allowed by the State DRMS permit. It is likely that a change to a 112 permit will require a modification and Grand Island should engage Boulder County early in discussions on such a modification.

In addition, this mining operation is the subject of an on-going zoning violation that will need to be resolved and may be resolved through the Special Use Modification Process. It appears that many structures may have been built without permits, a violation of the existing Development Agreement.

Boulder County CPP appreciates the opportunity to review AM-2 and looks forward to reviewing the modifications proposed by Grand Island Resources. The modification review will take time and may require a significant amount of discussion.

Sincerely,



Jesse Rounds