

September 23, 2021

Sean C. Muller Grand Island Resources LLC 4803 Caribou Road P.O. Box 3395 Nederland, CO 80466

RE: Wasterock Exploration Core Drilling, File No. P-2021-016, 2nd Notice of Deficiencies in a Notice of Intent to Conduct Prospecting Operations Application

Mr. Muller:

The Division of Reclamation, Mining and Safety (Division) has completed its review of your deficiency response received on September 15, 2021. The Division's review indicates the NOI application contains additional deficiencies that need to be addressed before the application can be approved. Please respond to the following deficiency items:

- On Page 2 of the application, under Section I General Information, Item 5 General Description, the text states the site is located "5 miles ENE of the town of Nederland". This is not correct, as the proposed site is actually located WNW of the town of Nederland. It is very important the location information in the application be accurate. Please correct this description to "5 miles ENE to the town of Nederland" or "5 miles WNW from the town of Nederland".
- 2) On Page 6 of the application, under Section III Project Description, Item 5, the text mentions an "emergent wetland" below the proposed site. However, there is no other mention of existing wetlands in the application. In fact, under Item 6(K), it states "no surface water or wetlands are within ½ mile of either wasterock area". Please remove this reference to wetlands if none exist near the proposed sites.
- 3) On Page 7 of the application, under Section III Project Description, Item 6(H), the total project area to be disturbed is said to be "16,000 sq ft or 0.312 acres". Firstly, 16,000 square feet is equal to 0.367 acres, and not 0.312 acres. Secondly, other portions of the application state each proposed drill pad will be approximately 80 feet x 100 feet in size with a disturbance of 0.184 acre. This would correspond with a total disturbance of 0.367 acres. Therefore, please correct the disturbance acreage from 0.312 acres to 0.367 acres.
- 4) The application proposes drilling 6-10 (2.5 inch diameter) holes into the tops of two existing waste rock piles to a total depth of approximately 1,500 feet. Please provide an estimated depth of waste rock the operation will need to drill through to get to the natural ground surface beneath each pile.



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- 5) Please provide a general description of the type of material present in each waste rock pile. Does this material have the potential to produce acid rock drainage?
- 6) The Division has calculated a required financial warranty for the site (see enclosed bond estimate) based on the proposed reclamation plan. Please review this estimate and provide any comments or questions with your response. The Division reserves the right to adjust this estimate as needed if the proposed reclamation plan is changed in any way through the adequacy review process. If no comments are provided (and the proposed reclamation plan is not revised), the total amount in the enclosed bond estimate (\$40,300) will be the set financial warranty amount for issuance of this NOI.

All deficiency items must be addressed by **November 9, 2021**. Please title your response with "Response to Deficiencies for NOI, File No. P-2021-016". Since no information in the application was designated as confidential per Rule 5.1.2(h), you may submit only a revised Form 2 (Public File) to address the deficiencies.

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

Sincerely,

any Erchenger

Amy Eschberger Environmental Protection Specialist

Encl: Division's bond estimate

Cc: Daniel Pollock, Grand Island Resources LLC Michael Cunningham, DRMS

COST SUMMARY WORK

	ption: c k Exploratio	Cost Summary on Core Pe	ermit Action:	New NOI 2021	Permit/Jol	b#: P2021016
te: Drilling PROJECT	IDENTIFIC	CATION		New NOI 2021	Fermit/30	0#. <u>F2021010</u>
Task #:	000	State:	Colorado		Abbreviation:	None
Task #: Date:	000 9/22/2021	State: County:	Colorado Boulder		Abbreviation: Filename:	None P016-000

TASK LIST (DIRECT COSTS)

Task	Description	Form Used	Fleet Size	Task Hours	Cost
001	Seal boreholes	BOREHOLE	1	40.00	\$26,074
002	Regrade 0.184 acre (Caribou drill pad)	DOZER	1	1.81	\$362
003	Regrade 0.184 (Silver Point drill pad)	DOZER	1	1.81	\$362
004	Mobilization/Demobilization	MOBILIZE	1	7.55	\$5,236
		<u>SUBTO</u>	TALS:	51.17	\$32,034

INDIRECT COSTS

OVERHEAD AND PROFIT:

Liability insurance:	2.02	Total =	\$647
Performance bond:	1.05	Total =	\$336
Job superintendent:	30.00	Total =	\$2,161
Profit:	10.00	Total =	\$3,203
		TOTAL O & P =	\$6,348
		CONTRACT AMOUNT (direct + $O \& P$) =	\$38,382

LEGAL - ENGINEERING - PROJECT MANAGEMENT:

Financial warranty processing (legal/related costs): Engineering work and/or contract/bid preparation: Reclamation management and/or administration:	\$0 0.00 5.00	Total = Total =	\$0 \$0 \$1,919
CONTINGENCY:	0.00	Total =	\$0
	TOTAL I	NDIRECT COST =	\$8,267
TOTAL BO	\$40,300		

BOREHOLE SEALING WORK

	Task description:	Seal boreho	les			
Site:	Wasterock Exploration Drilling	Core	Permit Action:	New NOI 2021	Permit/J	ob#: <u>P2021016</u>
<u>PROJE</u>	CT IDENTIFICATION	N				
Task # Date	: 9/22/2021	State: County:	Colorado Boulder		Abbreviation: Filename:	None P016-001
User	: <u>AME</u> Agency or organizat	tion name:	DRMS			

UNIT COSTS

Borehole Description	Sealing/Item Method	Diameter	Length	Quantity	Unit	Unit Cost	Total Cost
Seal (10) 2.5 in x 1,500 ft boreholes (Caribou drill pad)	Portland cement grout (Bag, material cost only94 lb. bag)	2.5	15,000	430.00	bag	\$19.95	\$8,578.50
Seal (10) 2.5 in x 1,500 ft boreholes (Silver Point drill pad)	Portland cement grout (Bag, material cost only94 lb. bag)	2.5	15,000	430.00	bag	\$19.95	\$8,578.50
Drill rig with mud pump	ATLAS COPCO ROC D3- 01,3.0 in.	NA	NA	40.00	EA	\$179.25	\$7,170.00
Truck with crew	Light Duty Pickup, 4x4, 1 T. Crew	NA	NA	40.00	EA	\$20.51	\$820.40
Water tanker	Water Tanker, 3,500 Gal.	NA	NA	20.00	EA	\$46.35	\$927.00

Job Hours: 40.00

Total Cost: \$26,074.00

BULLDOZER WORK

Drilling	ation Core	Per	mit Action:	New NOI 2021	Permit/Job#:	P2021016
PROJECT IDENT	TIFICATIO	N				
Task #: 002		State:	Colorado		Abbreviation:	None
Date: $9/22/20$	21	County:	Boulder		Filename:	P016-002
User: AME					-	
Agency or o	rganization n	ame: DF	RMS			
HOURLY EQUIP	MENT CO	ST				
	Cat D7R DS		Π			
Horsepower:	240					
Blade Type:	Semi-Univer	sal				
Attachment:	NA					
	1 per day					
Data Source:	(CRG)					
Cost Breakdown:						
				Utilization %		
Ownership Cost/Hou	ur:		\$81.02	NA		
Operating Cost/Hou	ur:		\$79.33	100		
Ripper own. Cost/Hou	ur:		\$0.00	NA		
Ripper op. Cost/Hor			\$0.00	0		
Operator Cost/Hor	ur:		\$40.04	NA		
MATERIAL QUA	NTITIES					
Swell factor: 1	500 1.125					
Swell factor: 1						
Swell factor: 1 Loose volume: 6 Source of estimated v	0.125 075 LCY olume:			= 0.184 ac x 1 ft deep		
Swell factor:1Loose volume:6	0.125 075 LCY olume:	80ft x 10 Cat Hand		= 0.184 ac x 1 ft deep		
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Job efficiency:	0.830	(1 SHIFT/DAY)
Spoil pile:	0.600	(FND-SF)
Push gradient:	1.000	(CAT HB)
Altitude:	1.000	(CAT HB)
Material Weight:	0.868	(CAT HB)
Blade type:	1.000	(PAT)
Net correction:	0.5230	
Adjusted unit production: 37	'3.58 LCY/hr	
Adjusted fleet production: 37	'3.58 LCY/hr	

JOB TIME AND COST

Fleet size:	1 Dozer(s)
Unit cost:	\$0.536/LCY

Total job time:	1.81 Hours
Total job cost:	\$362

BULLDOZER WORK

Wasterock Explo Drilling	oration Core	Per	mit Action:	New NOI 2021	Permit/Job#:	P2021016
PROJECT IDEN	TIFICATIO	N				
Task #: 003		State:	Colorado		Abbreviation:	None
Date: $9/22/2$	2021	County:	Boulder		Filename:	P016-003
User: AME						
	organization n	ame: Dl	RMS			
IOURLY EQUI	PMENT CO	ST				
Basic Machine:	Cat D7R DS		II			
Horsepower:	240					
Blade Type:	Semi-Univer	rsal				
Attachment:	NA					
Shift Basis:	1 per day					
Data Source:	(CRG)					
Cost Breakdown:						
				Utilization %		
Ownership Cost/H	our:		\$81.02	NA		
Operating Cost/H			\$79.33	100		
Ripper own. Cost/H	our:		\$0.00	NA		
Ripper op. Cost/H			\$0.00	0		
Operator Cost/H	our:		\$40.04	NA		
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Task # 003

Job efficiency:	0.830	(1 SHIFT/DAY)
Spoil pile:	0.600	(FND-SF)
Push gradient:	1.000	(CAT HB)
Altitude:	1.000	(CAT HB)
Material Weight:	0.868	(CAT HB)
Blade type:	1.000	(PAT)
Net correction:	0.5230	
Adjusted unit production: 3	73.58 LCY/hr	
Adjusted fleet production: 3	73.58 LCY/hr	

JOB TIME AND COST

Fleet size:	1 Dozer(s)
Unit cost:	\$0.536/LCY

Total job time:	1.81 Hours
Total job cost:	\$362

Page 1 of 2

EQUIPMENT MOBILIZATION/DEMOBILIZATION

Wasterock Exploration Co	obilization/Demo ore Permit	t Action:	01 2021	Damasi (/Lal	-# D202101 C
: Drilling		Inew IN	OI 2021	Permit/Jot	o#: P2021016
PROJECT IDENTIFICAT	<u>'ION</u>				
Task #: 004	State: C	Colorado		Abbreviation:	None
Date: 9/22/2021 User: AME	County: B	Boulder		Filename:	P016-004
Agency or organization	on name: DRMS	S			
EQUIPMENT TRANSPOL	<u>RT RIG COST</u>				
EQUIPMENT TRANSPOL	<u>RT RIG COST</u>		Sh	ift basis.	1 per dav
EQUIPMENT TRANSPO	<u>RT RIG COST</u>		Sh Cost Data		1 per day CRG Data
EQUIPMENT TRANSPO		ERIC ON-HIGHW	Cost Data	a Source: <u>C</u> ACTOR, 6X4, I	CRG Data
Truck Tractor Des	scription: GENI		Cost Data AY TRUCK TR 400 HP (2ND H	a Source: C ACTOR, 6X4, 1 ALF, 2006)	CRG Data
	scription: GENI	GENERIC FOLDI	Cost Data AY TRUCK TR. 400 HP (2ND H NG GOOSENEC	a Source: C ACTOR, 6X4, 1 ALF, 2006) K, DROP DEC	CRG Data
Truck Tractor Des Truck Trailer Des	scription: GENI	GENERIC FOLDI	Cost Data AY TRUCK TR 400 HP (2ND H	a Source: C ACTOR, 6X4, 1 ALF, 2006) K, DROP DEC	CRG Data
Truck Tractor Des Truck Trailer Des <u>Cost Breakdown:</u>	scription: GENI scription: C	GENERIC FOLDI TI	Cost Data AY TRUCK TR. 400 HP (2ND H NG GOOSENEC RAILER (25T, 50	a Source: C ACTOR, 6X4, 1 ALF, 2006) K, DROP DEC	CRG Data
Truck Tractor Des Truck Trailer Des <u>Cost Breakdown:</u> Available Rig Capacities	scription: GENI scription: C	GENERIC FOLDI TI 26-50 Tons	Cost Data AY TRUCK TR. 400 HP (2ND H NG GOOSENEC RAILER (25T, 50 51+ Tons	a Source: C ACTOR, 6X4, 1 ALF, 2006) K, DROP DEC	CRG Data
Truck Tractor Des Truck Trailer Des <u>Cost Breakdown:</u> <u>Available Rig Capacities</u> Ownership Cost/Hour:	scription: GENI scription: C 0-25 Tons \$21.28	GENERIC FOLDI TI 26-50 Tons \$37.94	Cost Data AY TRUCK TR. 400 HP (2ND H NG GOOSENEC RAILER (25T, 50 51+ Tons \$47.67	a Source: C ACTOR, 6X4, 1 ALF, 2006) K, DROP DEC	CRG Data
Truck Tractor Des Truck Trailer Des <u>Cost Breakdown:</u> <u>Available Rig Capacities</u> Ownership Cost/Hour: Operating Cost/Hour:	occupation: GENI scription: C 0-25 Tons \$21.28 \$26.55 \$26.55	GENERIC FOLDI TH 26-50 Tons \$37.94 \$50.48	Cost Data AY TRUCK TR. 400 HP (2ND H NG GOOSENEC: RAILER (25T, 50 51+ Tons \$47.67 \$56.21	a Source: C ACTOR, 6X4, 1 ALF, 2006) K, DROP DEC	CRG Data
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Machine	Weight/	Owner ship	Haul Rig	Fleet	Haul Trip	Return Trip	DOT Permit
Description	Unit	Cost/hr/ unit	Cost/hr/uni	Size	Cost/hr/	Cost/hr/ fleet	Cost/ fleet
-	(TONS)		t		fleet		
ATLAS COPCO	1.25	\$95.30	\$68.37	1	\$163.67	\$68.37	\$250.00
ROC D3-01,3.0 in.							
Cat D7R DS XR	32.01	\$81.02	\$132.49	2	\$427.02	\$264.98	\$250.00
Series II							

Subtotals: **\$590.69 \$333.35 \$500.00**

ROADABLE EQUIPMENT:

Machine Description	Total Cost/hr/ unit	Fleet Size	Haul Trip Cost/hr/ fleet	Return Trip Cost/hr/ fleet
Water Tanker, 3,500 Gal.	\$46.35	1	\$46.35	\$46.35
Light Duty Pickup, 4x4, 1 T. Crew	\$20.51	1	\$20.51	\$20.51
		Subtotals:	\$66.86	\$66.86

EQUIPMENT HAUL DISTANCE and Time

Nearest Major City or Town within project area region: Total one-way travel distance:	BOULDER 23.50	miles
Average Travel Speed:	40.00	mph
Total Non-Roadable Mob/Demob Cost * '* two round trips with haul rig:	\$5,157.34	
Total Roadable Mob/Demob Cost ** ** one round trip, no haul rig:	\$78.56	

Transportation Cycle Time:

	Non- Roadable Equipment	Roadable Equipment
Haul Time (Hours):	0.59	0.59
Return Time (Hours):	0.59	0.59
Loading Time (Hours):	1.30	NA
Unloading Time (Hours):	1.30	NA
Subtotals:	3.78	1.18

JOB TIME AND COST

Total job time: 7.55 Hours

Total job cost: **\$5,236**