

STATE OF
COLORADO

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

Cross Gold Mine, Permit No. M-1977-410, Clarification to certain activities approved by DRMS on December 22, 2021

Daniel Takami <danieltakami@gmail.com>

Mon, Dec 27, 2021 at 4:05 PM

To: "Eschberger - DNR, Amy" <amy.eschberger@state.co.us>, "Cunningham - DNR, Michael" <michaela.cunningham@state.co.us>, Sergio Rivera <sergio.rivera@novametallix.com>, Gabe Racz <gr@vrlaw.com>, Ed Byrne <edbyrne@smartlanduse.com>, Richard Mittasch <rmittasch@nedmining.com>, John Henderson <jrhcolaw@comcast.net>

Amy,

I trust you had an enjoyable holiday weekend. Enclosed you will find our responses clarifying the questions that were raised in the approval letter by DRMS dated December 22, 2021. Have a great rest of your week and a happy upcoming new year's weekend.

Respectfully,

Daniel J. Takami

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Dec 28, 2021 Response to DRMS Approval and clarification letter to GIR .pdf
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Division of Reclamation, Mining & Safety
c/o Ms Amy Eschberger
1001 E 62nd Ave,
Room 215
Denver, CO 80216

December 28, 2021

RE: Cross Gold Mine, Permit No. M-1977-410, Responses to DRMS' Responses to GIR's Proposed Activities letter dated December 21st, 2021.

Ms Eschberger,

Pursuant with DRMS' response requesting clarification to certain activities approved by DRMS on December 22nd, 2021, GIR provides answers below addressing each specific clarification point.

- 1) **DRMS** approves all proposed activities listed under "Priority 1".

GIR: appreciates the approval of the work by DRMS. Please note that most of the activities described in the request for approval are planned activities, some of which were underway prior to work stoppage as mandated by the December 15th Cease-and-Desist Order. The activities are part of normal mine operations and environmental management. GIR requested approval in three stages based on the revised schedule and reduction in personnel resulting from work stoppage.

- 2) While DRMS approves all Priority 1 activities, we (DRMS) would appreciate some clarification on the following Priority 1 activities:

- a. **DRMS:** Please provide additional information on the proposed activities related to ventilation (1.1.3 and 1.1.4). Will upgrading the ventilation system include any surface disturbances? Which mine openings will be used for ventilation?

GIR: *The ventilation system upgrade will not include any surface disturbance. All proposed work required will be implemented underground and will involve upgrading the existing fans at their respective locations with modern and efficient equipment. This is required to improve the air flow and quantity as required for personnel safety that will perform inspection activities of the water control, pumping and water conveyance systems. Please note this is consistent with the MSHA approved ventilation plan; as such, the Cross portal is the air intake, and the cross ventilation/escapeway shaft is the air exhaust, without making any modifications to these mine openings.*

- b. **DRMS:** Please provide additional information on the Ground Support Installation (1.1.5). Will these proposed activities occur completely underground?



GIR: *All ground support installations will occur underground exclusively and will consist of installing rock bolts, in accordance with our ground support policy, design and engineering such that employee safe access is addressed for maintenance and operation of the underground water control, pumping and conveyance sites.*

- c. **DRMS:** Please provide additional information on the “75” Sediment Control Sump Rehabilitation (1.2.2). What is the purpose of the “75” designation? Is this the 75th sump located in the Caribou Mine?

GIR: *The rehabilitation of the sump consists of clean-up (sediment and debris removal) within the sump such that the sump functions at higher efficiency for sediment removal. The “75” designation indicates that the sump is located three quarters of the way (0.75) between two underground survey control points. The number does not imply that it is the 75th sump.*

- d. **DRMS:** Please describe where sediment removed from underground sumps is laced.

GIR: *The sediment removed from the sumps is mucked with mine waste and placed within the approved surface waste rock area.*

- 3) DRMS approves all proposed activities listed under “Priority 2”, except for the Cross Shaft and Old Access Road Surface Reclamation (2.1.1), for which, DRMS has the following comments:

- a. **DRMS:** Please provide additional information on this proposed activity. For example, where is this mine opening located? Is this the mine opening referred to in Amendment No. 2 (AM-2) as the “Cross Ventilation Shaft”? If so, in AM-2, GIR is proposing to continue using this opening as a vent shaft during mining, and to reclaim it with a precast concrete panel closure. The current proposal to backfill this shaft seems to contradict the proposed plan in AM-2.

GIR: *The feature consists of a land subsidence which has recently been identified as a potential surface water influx to the underground workings. The proposed work consists of re-establishing the natural surface topography and natural surface drainage. This subsidence is not the Cross ventilation shaft referred to in AM-2.*

- b. **DRMS:** Would all proposed surface disturbances occur within the current approved permit area?

GIR: *The subsidence and area proposed for reclamation is within GIR’s current approved permit area. Access for reclamation activities would be via*



an existing mine road located along the boundary of GIR's approved disturbance zone.

- c. **DRMS:** This proposed activity was classified as “Priority 2 – Approval Requested by December 27, 2021”; does this mean GIR intends to perform the proposed earthwork activity in the coming weeks? Please explain why this activity is considered a high priority at this point in time.

GIR: *This activity has a very narrow window of opportunity which may have already passed; weather permitting, GIR would like to start backfill activities such that snow accumulation is prevented. Should the activities not be initiated at this time, access to the site may not be feasible until the summer of 2022 and the accumulated snow melt and run-off could enter the mine in spring.*

- 4) DRMS has the following comments regarding the proposed activities listed under “Priority 3”:

- a. **GIR:** Please provide additional information on the Winze Hoist and Winze Sump Rehabilitation (3.1.2). Where are these features located in the Cross Mine? Please be more specific in describing the proposed activities and explain why these activities are considered a high priority at this point in time.

GIR: *The winze (an internal underground shaft) is a historic but operational and essential part of the mine infrastructure which connects the main tunnel level with the underground lower levels. The winze hoist is the only means available for transporting equipment and timber to the lower levels of the mine and it also serves as an accessway for dewatering pipes. The activities related to the winze hoist rehab consist of upgrading and repairing the mechanical hoisting mechanism and repair of timberwork. As indicated previously, Winze rehabilitation is essential for safe access to the lower levels of the mine for rehabilitation and environmental management pertaining to groundwater management.*

- b. **DRMS:** Please provide additional information on the Sublevel Sediment Sumps Rehabilitation and Development (3.1.3). Please be more specific in describing the proposed activities and explain why these activities are considered a high priority at this point in time.

GIR: *The activities at the lower levels are critical to controlling water and sediments as the mine is being dewatered.*

- c. Please provide additional information on the Sediment Control Pond Upgrades (3.2.1). Is this referring to sediment ponds 3A-3C at the Caribou Mine? Please describe the type of “minor modifications” anticipated. DRMS approved the rehabilitation of sediment ponds 3A-3C through Technical Revision No. 8 (TR-



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8) and needs to assess whether the proposed activities will require an additional revision submittal.

***GIR:** The strategy simply comprises the installation of floating baffles (curtains) within the ponds to increase flow paths and reduce flow velocity aid in solids settling.*

5) DRMS has the following comments regarding the proposed Hydrogeologic Study (4):

- a. **DRMS:** Please provide the Scope of Work which details the anticipated activities for this study.

***GIR:** The Final Scope of Work and Schedule will be provided upon approval by GIR after receipt from the Hydrogeologic Independent Consultant. A Conceptual Hydrogeological Model will be prepared upon review of available geologic, hydrogeologic, topographic and historic mine dewatering records, among other data. Upon completion and acceptance by GIR of the Hydrogeologic Conceptual Model, a data collection strategy will be implemented. For purposes of Priorities 1 and 2, the Scope of Work will include discrete water source characterization prioritizing the Caribou Mine.*

If you have any additional questions or clarifications, please contact me and we will be happy to address your concerns.

Respectfully,

Daniel J. Takami
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