

December 29, 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, 110(2) Hard Rock Permit Amendment Application (AM-02), Adequacy Review No. 3**

Mr. Pollock:

The Division of Reclamation, Mining and Safety (Division) has completed its review of your adequacy response for Amendment No. 2 (AM-02), received on November 23, 2021. The Division has identified adequacy items in the application requiring clarification or additional information. These items are identified below under their respective exhibit heading, and are numbered sequentially.

**Application Form:**

- 1) On page 2, under Item 9 – Correspondence Information, the Applicant/Operator contact is listed as “Alfred F. Gerriets II”. This is a change from the current Applicant/Operator contact, which is Richard Mittasch. This means that after AM-02 approval, Mr. Gerriets would receive all important correspondence from our office regarding this permit. If this is correct, then no change is required to this section.

**Exhibit C – Mining Plan (Rule 6.3.3):**

- 2) On page 5 of this exhibit, the application states “The waste rock pile by the Cross Ore Building is an ore pile and it will remain an ore pile for the life of mine. It will have a maximum size of 1,000 yards. It will be exhausted then reclaimed at the end of mine.” Please be advised, until the operator has provided sufficient demonstration that mined material derived from both the Cross and Caribou mines does not have the potential to cause acid mine drainage or to release toxic- or acid-forming materials, all ore must be stored inside of the designated ore storage building. Therefore, please remove all ore material stored on the ground surface and provide photographic evidence this has been done. Additionally, please revise this exhibit to remove any language referring to continued ore storage outside of the Cross Ore Building. It should be noted, the question of whether this mine should be considered a designated mining operation will be explored outside of the AM-02 review process, during which, the Division will inform the operator of any additional information or testing required.
- 3) On page 5 of this exhibit, the application states the existing Caribou waste rock area will continue to be used for all waste rock generated on site. However, on Map 4, it appears the proposed new internal road



and fill material associated with the road will cover the majority of the existing waste rock pile. Additionally, it appears the existing waste rock pile could not be expanded to the north or east given its proximity to the permit boundary in these areas, or to the south given the proposed new road. Therefore, please explain how this existing waste rock pile will continue to be used by the operation for all waste rock generated on site. Will the storage area be expanded to the west? Please ensure the approximate location of the proposed storage area is accurately shown on all applicable maps.

- 4) The Division has the following comments regarding Table 1 – Disturbance Table:
  - a. The square feet and acreage values for several of the facilities listed do not correlate with the approximate dimensions provided. Some of these discrepancies lead to fairly large differences in the acreage amounts. For example, the acreage provided for “New Roadway Between Cross and Caribou Mines” is 0.653; however, the dimensions of 875 feet x 40 feet would result in 0.803 acre. The acreage provided for “Waste Rock Storage Area” is 0.277; however, the dimensions of 174 feet x 189 feet would result in 0.755 acre. The acreage provided for “Pond 3A, 3B, 3C (entire area)” is 0.1982; however, the dimensions of 93 feet x 157 feet would result in 0.335 acre. Just these three discrepancies alone would change the total disturbed area by 0.77 acre, which is fairly significant for a permit area of this size. Please ensure all disturbance values are correct and correlate with the corresponding values provided for that facility. The total disturbed area may need to be updated accordingly.
  - b. Please describe the “Land That Will be Reclaimed That Is Not Associated With a Reclamation Feature (includes \*)”, which is attributed 2.692 acres. Which types of disturbances are included in this acreage? The only facility listed in this table with an asterisk symbol is the “Cross Mine Decline Area”. Does that mean only this feature is included in the 2.692 acres?
  - c. For “Cross Mine Decline Area (will not be built)\*” no disturbance values are provided. Is this because the disturbance associated with this area is included in the “Land That Will be Reclaimed That Is Not Associated With a Reclamation Feature”? If not, please provide a disturbance acreage for this feature. Regardless of whether or not the decline will be built, the hillside disturbance already created in association with this feature will require reclamation, and must be included in the total disturbance acreage for the site.
- 5) On page 7 of this exhibit, the application states Coon Track Creek will be routed underneath the new internal road using twin 5 feet x 4 feet box concrete pre-cast culverts. According to Map 4, the new road would cross the existing creek channel three times. Does the operator intend to install twin box culverts at each of these locations?
- 6) In Table 2 – New Road Design Parameters, it states the surfacing thickness will be 24 inches. Please describe the type of surfacing anticipated.
- 7) On page 8 of this exhibit, the application states “A new two track road will be created to the Caribou 300 Level Portal area from USFS Road 505. This road will be 25 feet long and 12 feet wide. This will not be an engineered road but will be an access point for the area.” According to Maps 3 and 7, this new road will be located outside of the proposed permit area for the Caribou 300 Level Portal. Please

be advised, all proposed affected lands, including any existing roads that will be substantially upgraded to support the mining operation, or new roads, must be included in the proposed permit area. The permit area does not need to include off-site roads which existed prior to the date the application was made to the Division and which were constructed for purposes unrelated to the proposed mining operation and which will not be substantially upgraded to support the mining operation. Therefore, please remove this new road from consideration under AM-02 and modify this exhibit accordingly. The road may be added into the permit area under a subsequent Amendment application.

- 8) On page 8 of this exhibit, under the Operational Water section, the application states “Notice is provided here of required changes in permitting since last application. Historically, operations have used a pump located on the 4<sup>th</sup> level of the Cross Mine for dewatering.” There appears to be missing text in this section, as no explanation of the “required changes in permitting” was provided. Please describe any changes in permitting with regard to operational water, or if there are no changes, remove the confusing language which implies there are.
- 9) On pages 8 and 9 of this exhibit, the application discusses analyses conducted by Core Laboratories in 1994 on two composite samples from the Cross mine, indicating these results demonstrate the ore and waste rock from each of the two mines should not produce acid rock drainage. The application also states “Baseline water sampling over the last twenty years confirms these conclusions with consistently low metal loading and pH levels in the range of 6.4 to 7.6.” Please be advised, the Division does not accept the information provided thus far as sufficient demonstration that any material exposed by mining, placed in on-site solution containment systems or facilities, stockpiled, or disposed of on the affected land, does not have the potential to cause acid mine drainage or to release toxic- or acid-forming materials, per Rule 6.4.21(14). In fact, the recent water quality issues at the site resulting from the increased activities, including exceedances in discharge standards for zinc, cadmium, lead, copper, and silver, indicate the mine does have the potential to release toxic-forming materials. While no additional characterization is required for this application, this matter will be explored further outside of the AM-02 review process.
- 10) On page 9 of this exhibit, the application states “Appropriate water treatment is being provided at water treatment pond (Pond 1), sufficient to meet applicable water quality discharge standards, as specified in our CDPES permit”. As you are aware, the WQCD, CDPHE has recently issued a Notice of Violation and Cease and Desist Order for violations of this operation’s discharge permit, including exceedances in lead, cadmium, zinc, silver, and copper, some of which go back to May of 2020. The Mined Land Reclamation Board (Board) also found a violation related to the water quality issues at this site during the December 15, 2021 enforcement hearing. Therefore, the statement referenced above is not accurate. Please remove this statement, or replace it with an acknowledgement that the previous water treatment system is insufficient, and that a new treatment system will be proposed to the Division in a subsequent revision in accordance with the Board’s requirements.
- 11) On page 10 of this exhibit, the application states “As with groundwater, surface water quality impacts are not expected”. As described above, this statement is not accurate. Therefore, please remove this sentence or replace it with an acknowledgement of the recent exceedances observed at the discharge location, and that a new treatment system will be proposed to the Division in a subsequent revision in accordance with the Board’s requirements.

- 12) On page 10 of this exhibit, the application states “Permit conditions including numeric protection levels for unclassified groundwater uses and points of compliance will be provided to DRMS by December 31, 2021 in a water quality monitoring plan”. Also, on page 11 of this exhibit, the application states “The Groundwater Monitoring Plan for this facility will be submitted to DRMS by December 31, 2021”. As of the date of this letter, the Division has not received the information described above. However, per the enforcement hearing held on December 15, 2021, the Board requires the operator to submit, by February 28, 2022, a Technical Revision to modify the water management and treatment program for the site to sufficiently address all water quality issues, and provide a surface water and groundwater monitoring program that meets all applicable requirements of Rules 3.1.6, 3.1.7, 6.3.3, and 6.3.4. Therefore, the surface water and groundwater monitoring plan should be submitted in the Board-Ordered Technical Revision, and not through AM-02.

**Exhibit D – Reclamation Plan (Rule 6.3.4):**

- 13) The Division has the following questions regarding Table 1 – Site Components for Reclamation:
- a. Please ensure the acreages provided in this table correlate with the acreages provided in the Table 1 - Disturbance Table in Exhibit C (after they have been corrected as requested above). For example, the acreage provided for “New Roadways between Cross and Caribou Mines” is 0.6534; however, in the Exhibit C Table 1, the approximate dimensions for this feature are 875 feet x 40 feet, which would be equal to 0.803 acre. After all acreages in this table have been verified, please ensure the total disturbed acreage in this table (currently 4.4 acres) is also updated, if needed.
  - b. Please explain what is included in the acreage (2.692 acres) for “Land That Will be Reclaimed That is Not Associated With a Reclamation Feature”. Does this acreage include disturbance associated with the New Cross Mine Decline?
  - c. If the Caribou water treatment shed (Danny’s Den) will be reclaimed as shown on Map 6, please add it to this table. (Otherwise, Map 6 will need to be revised to show this structure will remain.)
  - d. If the Munitions Bunker (South) will be reclaimed as shown on Map 6, please add it to this table. (Otherwise, Map 6 will need to be revised to show this structure will remain.)
- 14) On page 3 of this exhibit, the application discusses closure plans for the Cross Mine Adit and Idaho Tunnel Portal, specifying the concrete block wall closure proposed for the Idaho Tunnel Portal will include installation of a 2 foot x 2 foot x 0.25 foot grated access door to provide for water inspection. Because the Cross Mine Adit is also a draining mine opening, will a similar grated access door be installed on its concrete block wall closure? If so, please add this language to the Cross Mine Adit reclamation plan.
- 15) On page 8 of this exhibit, the application states the rock pile by the Cross Ore Building is actually an ore pile which will have a maximum size of 1,000 cubic yards, it will remain an ore pile for the life of mine, and at closure, all ore will have been removed from the site and the ore pile footprint (approximately 0.106 acre) will be reclaimed. As stated above, the Division does not authorize this

location to be used for continued ore storage, and the existing ore material must be removed from the ground surface and placed inside the ore storage building (or hauled off site). While the footprint of the existing stockpile will need to be reclaimed as described in this exhibit, please remove any language indicating ore material will continue to be stored on the ground surface.

- 16) On page 9 of this exhibit, the application states ‘The two-track road to the Caribou 300 Level Portal will be reclaimed’ and that it “will be ripped, tilled, and regraded prior to revegetation”. According to Maps 3 and 7, this new road (25 feet x 12 feet) would be located outside of the proposed permit area. As noted above, all proposed affected lands, including any existing roads that will be substantially upgraded to support the mining operation, or new roads, must be included in the proposed permit area. Therefore, please remove this new road from consideration under AM-02 and modify this exhibit accordingly. The road may be added into the permit area under a subsequent Amendment application.
- 17) On page 9 of this exhibit, the application states there is no available soil on site for reclamation, and that topsoil will be sourced locally in Nederland, CO [approximately 155,250 cubic feet (5,750 cubic yards)]. The operator is proposing to replace 8-12 inches of topsoil on most disturbed areas, with 2 feet of topsoil to be placed on areas such as the waste rock storage footprint. In Table 1 – Site Components for Reclamation, the operator estimates a total of 4.4 acres will require reclamation. Therefore, it would appear the estimated 5,750 cubic yards of topsoil to be imported for reclamation is based on a topsoil replacement depth of just less than 10 inches. Because some areas will require much more topsoil (2 feet), the Division believes it would be more appropriate to estimate approximately 7,099 cubic yards of topsoil will need to be imported for reclamation (based on an average replacement depth of 12 inches on 4.4 acres). Please adjust this language accordingly. (This estimated topsoil volume may need to be modified if the proposed disturbance amount changes.)
- 18) On page 10 of this exhibit, the application states topsoil will be replaced at a depth of 8-12 inches in areas with thin and rocky soils (approximately 0.178 acre) and replaced at a depth of 2 feet in other areas such as the waste rock area footprint (approximately 1.25 acre). These estimated acreages total 1.428 acre, which is far less than the estimated 4.4 acres of disturbance which will require reclamation. Please explain and/or correct this discrepancy. What is the estimated total disturbed acreage which will be retopsoiled (and revegetated) for reclamation?
- 19) On pages 12 and 13 of this exhibit (and in Table 6 – Slopes Steeper Than 2:1 and 3:1), the application discusses existing slopes at the site (approximately 0.777 acres horizontal surface and 0.955 acres slope surface) which are steeper than 2:1, and indicates these slopes will be reconfigured to Approximate Original Contour (AOC) or less and will blend in with the surrounding topography or match the AOC. Please be advised, no disturbed land shall be left at a slope steeper than 2H:1V for reclamation. Therefore, please be sure any language in this exhibit (and the reclamation plan maps) reflects that all disturbed land will be graded to 2H:1V or flatter.
- 20) On page 13 of this exhibit, the application states the New Cross Decline Portal is not going to be constructed, and that a geotechnical assessment of the current slope stability will be performed to determine whether the slope requires stabilization or can be revegetated as-is (with the details of the proposed stabilization/reclamation plan to be provided to the Division in a Technical Revision). Please be advised, the Division will not accept leaving this disturbed hillside at its current steep gradient.

Additionally, a reclamation plan for this disturbance and costs for implementing the plan must be provided with this application. Therefore, please provide a reclamation plan for the New Cross Decline Portal area which would ensure the disturbed slopes are left no steeper than 2H:1V and are adequately stabilized and revegetated. If the operator wishes to revise this plan later, it can be done through the submittal of a Technical Revision.

- 21) On pages 13 and 14 of this exhibit, the application includes a list of mine components that will remain after reclamation. Please ensure this list correlates with the reclamation plan map(s) provided in the application. For example, the approximate location of some of the features in the list, including the Septic Tank and Leach Field, are not shown on Map 6. Additionally, some features in this list are shown to be reclaimed on Map 6, such as the Caribou Water Treatment Shed (Danny's Den) and Munitions Shed 2 (also called Munitions Bunker South).
- 22) The Division is currently reviewing the revised Reclamation Costs provided on page 15 of this exhibit and in Appendix III, and will inform the operator if additional information is required in order for the Division to calculate the required bond amount for AM-02 approval.

**Exhibit E – Maps (Rule 6.3.5):**

- 23) For Map 1, the Division has the following comments:
  - a. Please add "Exhibit E" to the map title.
  - b. The "Current Permit Boundary" indicated on the map (with a blue line) and stated in the legend to be 9.36 acres, is not accurate. The current permit area is 8.95 acres, as of the Division's approval of Acreage Reduction No. 1 on November 12, 2020. Please correct this boundary on the map and correct the acreage in the legend.
- 24) For Map 2, the Division has the following comments:
  - a. Please add "Exhibit E" and "Mining Plan Map" to the map title.
  - b. The "Current Permit Boundary" indicated on the map (with a blue line) and stated in the legend to be 9.36 acres, is not accurate. The current permit area is 8.95 acres, as of the Division's approval of Acreage Reduction No. 1 on November 12, 2020. Please correct this boundary on the map and correct the acreage in the legend.
  - c. Please add the proposed permit acreage (9.6 acres) for the Cross and Caribou mine area.
  - d. Please include the names of all landowners within 200 feet of the proposed permit boundary.
  - e. Please include the owners of record of all permanent or man-made structures located within 200 feet of the proposed permit boundary. Given the number of structures owned by GIR, the operator may choose to label only the non-GIR-owned structures, and add a feature to the legend explaining

that all structures not labeled are owned by GIR. It is the Division's understanding that Caribou Road, the power line, and the phone line shown on this map, are not owned by GIR.

- f. Please remove the "Ore Storage Area" shown in the Cross Mine area, as the Division does not authorize the operation to continue storing ore at this location (as described above).
- g. Please label the CDPHE discharge point.
- h. Please label the explosives storage area.
- i. Please show all water infrastructure, including pipelines (infrastructure specifically related to the new water treatment system should be submitted in the Board-Ordered Technical Revision and not in this application).

25) For Map 3, the Division has the following comments:

- a. Please add "Exhibit E" and "Mining Plan Map" to the map title.
- b. Please add the proposed permit acreage for the Potosi Shaft (0.06 acre) and Caribou 300 Level Portal (0.33 acre) areas.
- c. Please include the names of all landowners within 200 feet of the proposed permit boundaries.
- d. Please show all permanent or man-made structures located on and within 200 feet of the proposed permit area. For example, the Division is aware of some historic structures located within 200 feet of the proposed Potosi Shaft area, which are not shown on this map.
- e. Please include the owners of record of all permanent or man-made structures located within 200 feet of the proposed permit boundary. The operator may choose to label only the non-GIR-owned structures, and add a feature to the legend explaining that all structures not labeled are owned by GIR. It is the Division's understanding that Caribou Road and Forest Service Road 505 shown on this map, are not owned by GIR.
- f. The Caribou 300 Level Portal map includes a short access road off of Forest Service Road 505 (not included in the proposed permit area) which, according to Map 7 (and the proposed reclamation plan), will be reclaimed when mining concludes. As stated above, all proposed affected lands must be included within the proposed permit area, including any existing roads which will be substantially upgraded to support the mining operation, or new roads. Therefore, please remove this new road from consideration under AM-02 and modify this map accordingly. The road may be added into the permit area under a subsequent Amendment application.

26) For Map 4, the Division has the following comments:

- a. Please add "Exhibit E" and "Mining Plan Map" to the map title.

- b. The “Current Permit Boundary” indicated on the map (with a blue line) and stated in the legend to be 9.36 acres, is not accurate. The current permit area is 8.95 acres, as of the Division’s approval of Acreage Reduction No. 1 on November 12, 2020. Please correct this boundary on the map and correct the acreage in the legend.
- c. Please remove the “Ore Storage Area” shown in the Cross Mine area, as the Division does not authorize the operation to continue storing ore at this location (as described above).
- d. Please label the CDPHE discharge point.
- e. Please label the explosives storage area.
- f. Please show all water infrastructure, including pipelines (infrastructure specifically related to the new water treatment system should be submitted in the Board-Ordered Technical Revision and not in this application). How will water from the Cross and Caribou mines be directed to Pond 2 with the proposed new internal road to be constructed between these features?
- g. Please show the approximate location(s) for the box culverts to be installed beneath the proposed new internal road.
- h. This map shows the proposed new internal road covering the Munitions (South) structure. Will this structure be removed prior to construction of the road? (According to Map 6, the area where this structure is located will be reclaimed.)

27) For Map 5, the Division has the following comments:

- a. The Division does not believe Map 5 is necessary, since Map 6 seems to show how all disturbances at the Cross and Caribou mine area will be reclaimed. In fact, this map creates more confusion as it shows some areas to be backfilled (slope above Idaho Tunnel, Pond 3C, Ore Storage Area), but not others. This map seems to indicate the new internal road fill will remain in place for reclamation, while the reclamation plan indicates the road will be removed and the associated fill material graded to 3H:1V for reclamation. This map also creates confusion over which structures are proposed to remain for reclamation, since Map 6 shows several of the structures shown on this map to be “Reclaimed and Revegetated”. The Division recommends the operator remove Map 5 and ensure all reclamation details are included on Map 6.
- b. If the operator chooses to keep Map 5, the Division has the following comments:
  - i. Please add “Exhibit E” and “Reclamation Plan Map” to the map title.
  - ii. The “Current Permit Boundary” indicated on the map (with a blue line) and stated in the legend to be 9.36 acres, is not accurate. The current permit area is 8.95 acres, as of the Division’s approval of Acreage Reduction No. 1 on November 12, 2020. Please correct this boundary on the map and correct the acreage in the legend.

- iii. This map shows the proposed grading plan for the slope around the Idaho Tunnel Portal, Pond 3C, and the ore storage area. However, a grading plan is not provided for other disturbance features to be reclaimed such as Ponds 3A and 3B, Pond 1, Pond 2, the New Cross Mine Decline disturbance area, the new internal road, and the Caribou waste rock storage area. If the purpose of this map is to show the proposed slope grading for all disturbed areas, please be sure to include this information for all areas requiring backfilling and/or grading for reclamation.

28) For Map 6, the Division has the following comments:

- a. Please add “Exhibit E” to the map title.
- b. The “Current Permit Boundary” indicated on the map (with a blue line) and stated in the legend to be 9.36 acres, is not accurate. The current permit area is 8.95 acres, as of the Division’s approval of Acreage Reduction No. 1 on November 12, 2020. Please correct this boundary on the map and correct the acreage in the legend.
- c. In the “Typical Top Soil Cover Detail, it shows that 24 inches of topsoil will be placed on reclaimed areas. However, the proposed reclamation plan indicates that 8-12 inches will be placed on the majority of the disturbed land, with 24 inches to be placed only on the waste rock storage area. If 24 inches of topsoil will be replaced on all disturbed lands, please be sure the reclamation plan and bond estimate are updated accordingly. Otherwise, please revise the Typical Top Soil Cover Detail on this map to reflect the actual proposed topsoil replacement depth for most disturbed areas.
- d. Please remove the Cross Snowshed, since the proposed reclamation plan includes removing this structure.
- e. The proposed reclamation plan includes three different seed mixes for the site (Tables 3-5). Please show the approximate locations on this map that will receive each of the proposed seed mixes.
- f. If Map 5 is removed, as recommended above, please be sure to add the proposed slope gradients to this map.

29) For Map 7, the Division has the following comments:

- a. Please add “Exhibit E” to the map title.
- b. The current map title is “Cross and Caribou Mine – General Facility Arrangement: Caribou 300 and Potosi”. However, the Division believes this is an error, as this map appears to be a reclamation plan map. Therefore, please change “General Facility Arrangement” to “Reclamation Plan Map”.
- c. In the “Typical Top Soil Cover Detail, it shows that 24 inches of topsoil will be placed on reclaimed areas. However, the proposed reclamation plan indicates that 8-12 inches will be placed on the majority of the disturbed land, with 24 inches to be placed only on the waste rock storage area. If 24 inches of topsoil will be replaced on all disturbed lands, please be sure the reclamation plan is

updated accordingly. Otherwise, please revise the Typical Top Soil Cover Detail on this map to reflect the actual proposed topsoil replacement depth for most disturbed areas.

- d. The proposed reclamation plan includes three different seed mixes for the site (Tables 3-5). Please show the approximate locations on this map that will receive each of the proposed seed mixes.
- e. The Caribou 300 Level Portal map includes a short access road off of Forest Service Road 505 (not included in the proposed permit area), which is shown to be reclaimed when mining concludes. As stated above, all proposed affected lands must be included within the proposed permit area, including any existing roads which will be substantially upgraded to support the mining operation, or new roads. Therefore, please remove this new road from consideration under AM-02 and modify this map accordingly. The road may be added into the permit area under a subsequent Amendment application.

30) For Map 8, the Division has the following comments:

- a. Please add "Exhibit E" to the map title.
- b. The "Current Permit Boundary" indicated on the map (with a blue line) and stated in the legend to be 9.36 acres, is not accurate. The current permit area is 8.95 acres, as of the Division's approval of Acreage Reduction No. 1 on November 12, 2020. Please correct this boundary on the map and correct the acreage in the legend.

**Exhibit L – Permanent Man-Made Structures (Rule 6.3.12):**

- 31) This exhibit identifies four permanent or man-made structures located within 200 feet of the affected land boundary which are not owned by GIR, including County Road 128/Caribou Road (owned by Boulder County), a power line (owned by Xcel Energy), a phone line (owned by Century Link/AT&T), and USFS Road 505 (owned by the USFS). Of these, the operator has provided a structure agreement only for County Road 128/Caribou Road. Please provide the requested structure agreements for the three other structures not owned by GIR. Where such a structure is a utility, the operator may supply a notarized letter, on utility letterhead, from the owner(s) of the utility that the mining and reclamation activities, as proposed, will have "no negative effect" on their utility.

**Additional Item(s):**

- 32) Pursuant to Rule 1.6.2(1)(c), any changes or additions to the application on file in our office must also be reflected in the public review copy which was placed with the local County Clerk and Recorder. Pursuant to Rule 6.4.18, you must provide our office with an affidavit or receipt indicating the date this was done.

This concludes the Division's 3<sup>rd</sup> adequacy review of AM-02. The decision date for the application is currently set for **January 8, 2021**. Please submit your adequacy response with sufficient time prior to the decision date for the Division to complete its review process. If additional time is needed, you must submit an extension request to our office prior to the decision date.

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](mailto:amy.eschberger@state.co.us).

Sincerely,

A handwritten signature in blue ink that reads "Amy Eschberger". The signature is written in a cursive, flowing style.

Amy Eschberger  
Environmental Protection Specialist

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