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

March 23, 2022

Mr. David Felderhof
Zephyr Gold USA Ltd.
1959 Upper Water St. Suite 1300
Halifax, Nova Scotia, CA B3J 3N2

Re: Dawson Gold Mine, Permit No. M-2021-046;
Second Adequacy Review

Dear Mr. Felderhof:

The Division of Reclamation, Mining and Safety (DRMS) has completed its review of your responses (received February 9, 2022) to our October 14, 2021 preliminary adequacy review (PAR) for the Dawson Gold Mine 112d-2 Reclamation Permit Application. **The current decision date for the application is March 31, 2022**.

Please be advised that if you are unable to satisfactorily address any concerns identified in this review before the decision date, it will be your responsibility to request an extension of the review period. If there are outstanding issues that have not been adequately addressed prior to the end of the review period, and no extension has been requested, the Division will deny this application.

The following adequacy questions have kept the numbering sequence for tracking purposes

RULE 3.1 - RECLAMATION PERFORMANCE STANDARDS

3.1.6 Water - General Requirements

1. Mine pool: The response is not adequate. Additional clarification and information is required. The response appears to indicate that mining the granitic host rock would yield little to no water quality concerns in the mine pool; while also stating "In the long term, it is expected groundwater quality within the mine workings will return to background levels." Please provide the following:
   a) Clarify expected water quality impacts on the mine pool; and
   b) Based on House Bill 19-1113, the DRMS requested a demonstration of "a reasonably foreseeable end date for any water quality treatment necessary to ensure compliance with applicable water quality standards". Your response only indicated that "long term" treatment would not be necessary. A reasonable end date is required.
2. Potential seepage treatment: The response is considered adequate.
3. Water rights: The response is considered adequate.

3.1.7 Groundwater – Specific Requirements

4. Groundwater protection: See groundwater comments presented under Exhibit G below.

3.1.9 Topsoiling

5. Vegetative piles: The response requires additional information, as only the mill site was discussed. Please expand the commitment to implement a beneficial use plan for the removed trees to all other areas that will be cleared, such as the FTSF and other stockpiles.

3.1.10 Revegetation

6. Weed control: The response is considered adequate.

RULE 6.4 - SPECIFIC EXHIBIT REQUIREMENTS - 112 RECLAMATION OPERATION

6.4.1 EXHIBIT A - Legal Description

7. Entrance Location: The response is considered adequate.

6.4.3 EXHIBIT C - Pre-mining & Mining Plan Map(s) of Affected Lands

8. Map requirements: The response requires additional submittals. The updated Exhibit C.3.2 was not signed. Please resubmit Exhibits C.3.2 with the preparer's signature (electronic is acceptable), date prepared and with the corrected Applicant's name.
9. Type of vegetation: The response is considered adequate.
10. Open Process Water Channels: The response is considered adequate.
11. Overburden storage pile: The response is considered adequate.
12. Filtered Tailings Storage Facility: The response is considered adequate.
13. Contingency Tailings storage Area: The response is considered adequate.
14. Utilities and roads: The response is considered adequate.

6.4.4 EXHIBIT D - Mining Plan

15. Mine dewatering to surface pond: The response is considered adequate.
16. Underground backfill: The response is considered adequate.
17. Blasting: The DRMS accepts the commitment to submit a blasting plan as a technical revision (TR). No blasting may occur until the TR is submitted and approved by the DRMS.
18. Ventilation raises: The response is considered adequate.
19. Mill Design secondary containment: The response is acceptable. Please be aware the Mill Facility will need to have adequate containment of 110% of all materials, including designated chemicals, ore slurry, tailings slurry etc. The containment structures may separate the Mill into sections to provide separated containment areas. Also please note that any bay or manway doors will need to be designed as to not provide a breach in containment (i.e., raised man doors with stairs and or ramp in/ramp out structures on all bay doors). The final review, design specifications, QA/QC documentation, incremental inspection schedule and schematics related to Mill and its components must be addressed through the Division's Revision Process prior to construction.

20. Mill final certification: The response is considered adequate.

21. Features external to the Mill Facility: The Applicant's commitments are acceptable. Please be aware all external tanks must possess a secondary containment structure as previously stated. In addition, any sump, flow or return lines that span from one containment structure to another, must have a secondary containment device. For example, lines running from the tailings thickener back to the Mill Facility must be double walled or have some other method of secondary containment.

22. Reagent Storage: The details included the updated section 2.4.5.6 "Reagents" regarding bulk reagent storage in a sea container is not adequate. In general, sea containers are not accepted as secondary containment for storing designated chemicals or hazardous materials, as they are prone to extreme temperature fluctuations and do not provide separation for containment of chemicals that could produce hazardous byproducts when mixed. A separate room or building will be required for bulk storage of reagents. The structure may be within or attached to mill facility itself, or may be a free standing structure. All practices regarding secondary containment, possible separation of reagents within the structure, loading and unloading containment, and containment during transfer from bulk storage to the reagent mixing area should be followed. Please submit a general concept and design of a bulk reagent storage facility including details regarding potential sumps, containment and separation structures. The engineering details, QA/QC documentation and incremental inspection schedule can be addressed in detail through the Division's Revision process prior to construction.

    Additionally, please revise section 2.4.5.6 "Reagents" to address all elements of Rule 6.4.21(6) for designated chemicals handling. Specifically Section (6)(b)(i) regarding how all designated chemicals used in the metallurgical process will be handled during active mining operations, during periods of Temporary Cessation and disposed or detoxified at the conclusion of operations.

Note: The February 9, 2022 response letter skipped the DRMS original Comment #23, at least in format. It appears Comment #23 may have been responded to at the end of the Comment #22 response. The response numbered 23, responds to our Comment #24. This trend continued through Comment #31 (which was the DRMS's Comment #32). Your February 9th letter provided responses to our Comment #32 in both your Comment responses numbered 31 and 32, thereby syncing up the number sequence starting with Comment #32. Comment #23 below, accounts for what appears to be your response at the end of your Comment #22 response.

23. PAG waste rock: The response is not adequate and requires additional clarification. The response at the end of Comment 22 implies no PAG material is expected. However, it also states additional exploration and sampling would occur underground to confirm this. Furthermore, in Section 2.4.6 it is stated there will be 130,500 tons of PAG material generated. Please explain the discrepancy. If PAG material is generated, what are the long term hydrologic effects of PAG material used as backfill within the mine working and subsequently inundated by groundwater after the mining has completed?

24. Underdrain protection: The response is considered adequate.

6.4.5 EXHIBIT E - Reclamation Plan

25. Growth Medium Materials: The response is considered adequate.

26. Mine Portal and Ventilation Raise Closing: The response is considered adequate.
27. Sediment ponds and drainage structures: The response is considered adequate.
28. Revegetation: The response is considered adequate.

6.4.6 EXHIBIT F - Reclamation Plan Map

29. Map requirements: The response is not adequate. Two maps were submitted as Sheets 1 of 2 and 2 of 2. Neither sheet contained a signature, north arrow, or the Applicant's name. In addition, Sheet 2 did not include a legend; and Sheet 1 does not show the "Shaft or Adits" referenced in the Note related to "Designed Filling". Pursuant to Rule 6.2.1(2), maps shall show: a) name of the Applicant; b) be prepared and signed by a qualified person; c) show the date prepared; d) identify and outline the area that corresponds with the application; and e) presented with a scale not be larger than 1 inch = 50 feet nor smaller than 1 inch = 660 feet, with a map scale, appropriate legend, map title, date and a north arrow included. Please resubmit these maps with corrections as required.
30. Reclamation slope length: The response is considered adequate.
31. Reclamation grading of FTSF: The response is considered adequate.
32. Closure stormwater controls: The response is not adequate and requires additional information. Please address the following:
    a. The DRMS notes existing and proposed culverts are shown in Appendix N prepared by Jesik. However the following is missing and needs to be provided:
        - Culvert sizing (i.e., hydraulic performance including entrance/inlet head and discharge velocity for the purpose of determining potential road overtopping/scour and designing apron protection, respectively);
        - Drainage basin map showing the delineation of the "six basins with 6 subbasins" (ref. p. 7, "Minor Drainage Basins").
    b. The DRMS notes an apparently thorough analysis was performed, but it lacks design parameter selection rationale. Manning's "n" and times of concentration appear high. Hydrologic soil groups are provided, but no rationale for rational method runoff coefficient "C" or SCS curve numbers. Please provide the following:
        - Time of concentration methodology and calculations;
        - Rationale for SCS curve number and rational method C selection;
        - Rationale for Manning's "n" selection (*note: best practice, per Mile High Flood District {formerly Urban Drainage & Flood Control District}* is to consider a minimum "n" for erosion potential and a maximum "n" to assess channel capacity).
33. Existing vs new roads: The response is considered adequate.
34. Contact water pond: The response is considered adequate.
35. Process water channels: The response is considered adequate.

6.4.7 EXHIBIT G - Water Information

36. Sedimentation and stormwater ponds: The response is considered adequate.

37. Figure 2: The response is not adequate. Figure 1 has been updated from the original application. Please update the legend to describe the new features on this map. It appears there are five new monitoring well locations that are not identified, the boxes with dots are not defined, and the permit boundary is not clearly identified. The Keller Well is not shown or indicated nor are wells 73772, and 99071.

    Figure 2 is adequate for depicting there is faulting in the general area. Please add the permit boundary.

38. Well screen intervals: The response is considered adequate.

39. Boring logs: The response is not adequate. The well construction details are incomplete. Please provide the size and type of filter pack used, the interval of filter pack placement, and describe what was placed above the filter pack between the cement seal. Please comment on what effects on monitoring there will be with each monitoring well having a 20 foot sump.

    Section 2.7.1, third paragraph, there is a reference to an unnamed steeply dipping east-west fault. Is this fault the Wet Mountain Frontal Fault as named in Figure 2.4.2-1 Property Geology?

    How did the Applicant arrive at a 20 foot drop in water level within a well as needing to be addressed when modelling indicates a 5 foot or less drop in water level associated with mining activities? Shouldn't the trigger be at least 5 feet? Does the Applicant propose to monitor water levels within water walls to get baseline water level data for comparison purposes?

40. Monitoring well network: The response requires additional clarification. Figures 1 and 3 are difficult to follow along with what has been presented in the text. Please update both figures with a common well identifying convention, i.e. MW-1, MW-2, MW-3. Please update the text to reflect these changes.

    Additional clarification is needed, it appears the point-of-compliance well is Well No.3 in Figure 1 but it is not reflected in the text or Figure 3.

    Table 2.7.4-1 needs to be updated to reflect which standards are dissolved results and those that are not.

    It appears the Applicant is proposing a new monitoring well to be located outside and to the west of the proposed permit and affected land boundary. The Division must have access to all monitoring wells over the life of the mine and during the final reclamation of the wells. All monitoring wells need to be located within the proposed affected land boundary. Please clarify the location of the western most monitoring well and include the costs for abandoning all wells.

    Please update Figure 3 to distinguish between surface and groundwater sampling locations.

    Pursuant to Rule 3.1.7(9)(b) please provide information on how the monitoring wells will be completed (general construction details), how the wells will be sampled, what is the anticipated formation that each well is projected to monitor, and what is the schedule for well installation.

41. Compliance well: The response requires additional clarification. Please confirm that Well No. 3 is to be the point-of-compliance well.

    Section 2.7.4.1, last paragraph, the Applicant states if there is an exceedance detected at the point-of-compliance they will contact the nearby well owners to verify the exceedance and begin well testing and supply an alternate water source for consumption. The Applicant shall update the text to include a statement that a groundwater investigation will be initiated to determine the source of contamination and begin groundwater mitigation efforts as soon as possible to prevent continued negative groundwater quality and/or quantity impacts. Please note pursuant to Rule 3.1.7(9) an Operator must provide the Division a written report within five (5) working days when there is evidence of groundwater discharges exceeding applicable groundwater standards.

42. Quality Assurance Project Plan: The response requires additional information. In the QAPP it identifies the quality assurance officer (QAO) that will submit monthly reports to the Dawson Gold Mine Manager. Please designate this person, if at this time this person cannot be designated provide a time frame and a commitment for when this person will be designated. Please note this person needs to be designated prior to quarterly groundwater monitoring.

    The QAPP references Appendix F addressing groundwater sampling, monitoring parameters of the contact water pond, FTFS, and others. While the QAPP does mention the rate of duplicate and equipment blank collection it is not consistent with Appendix F. Appendix F, Section 5.0, addresses only environmental monitoring for the FTFS not monitoring of the site. Additionally, there are no details related to how the wells will be sampled, how they will be monitored during sampling, what QC protocols will be followed, and there are no details for sampling surface water. The parameters groundwater samples will be analyzed for are not consistent with Exhibit G, please update. Please provide a sampling and analysis plan (SAP) that addresses the missing items. The Division recommends developing Standard Operating Procedures (SOPs) to include in the SAP so ensure both surface water and groundwater samples are collected in a consistent manner over the life of mine.

43. WQCC Regulation 41: The response requires additional clarification. Table 2.7.4-1 needs to be updated to reflect which standards are dissolved results and those that are not.

44. Baseline Groundwater Quality: The DRMS and the Applicant are continuing discussions on baseline data.

45. Domestic well 73772: The response requires additional information. Figure 1 does not clearly indicate the location of well 73772, was the Applicant able to verify the well existence?

    Provide an updated Exhibit C map that meet the following, pursuant to Rule 6.4.12(8)(a) the Applicant is to provide an Exhibit C map that shows all tributary water courses, wells, springs, stock water ponds, reservoirs and ditches, on the affected land and on adjacent lands where such structures or waters are within two (2) miles of the proposed affected lands.

46. Mine pool: The response requires additional information:

    a. The response states the mine pool will be included into the monitoring network and will follow the QAPP. The QAPP does not mention the mine pool or how it will be

monitored. Furthermore, Appendix F does not address monitoring the mine pool. Provide the details how the mine pool water quality will be monitored during mine activity.

b. Provide the details of how the mine pool water quality will be monitored during mine inactivity.

47. Grape Creek flow: The response is not adequate. Section 2.7.2 needs additional clarification. In the second paragraph it is stated that Grape Creek may be affected by mine activities where there are no faults or structures between the mine and the creek. In the third paragraph it is stated the mine will have no measurable impacts to the creek because of faulting between the mine and the creek. Does the Applicant believe the Grape Creek will not be affected by the mine or that it will only be affected in select areas?

    The Applicant's proposed surface water monitoring location is in an area where there is abundant faulting between the mine and creek but there is no monitoring location in an area where there is no faulting between the creek and mine. The monitoring locations need to be updated to account for an area of the creek that may be affected by mining where there are no barriers to flow.

    Appendix F does not provide suitable details on how the surface water locations will be sampled. Please provide the missing sampling details.

48. Fracture system: The response id considered adequate at this time.

6.4.8 EXHIBIT H - Wildlife Information.

49. Townsend big-eared bat: The response requires additional information. Please provide documentation from CPW stating it is suitable for the Applicant to plug and abandon the adits used for roosting.

50. Raptors: The response is considered adequate. The DRMS accepts the Applicant's commitment to performing annual raptor nest survey.

6.4.12 EXHIBIT L - Reclamation Costs

51. Omitted tasks: The requested responses to Items a through c below are considered adequate. However, your response to Comment 13 adds a 15,600-gallon Tailings Filter Feed Stock Tank, which will require demolition for final reclamation. Item d is added below:

    a. Reclamation of the FTSF - adequate,

    b. Removal of the contact water pond liner and embankment - adequate,

    c. Construction of the required EPF area diversion channels – adequate

    d. Demolition of 15,600-gallon Tailings Filter Feed Stock Tank

    Please revise Exhibit L to include Item d above, or explain where they are covered in the provided Exhibit L.

6.4.13 EXHIBIT M - Other Permits and Licenses.

52. Water rights and EPA UIC: The response is considered adequate.

6.4.14 EXHIBIT N - Source of Legal Right to Enter.

53. Patented claims: The response is considered adequate.
54. Fremont Co Assessor Schedule 3943000000021: The response is considered adequate.
55. Fremont Co Assessor Schedule 17000040: The response is considered adequate.

6.4.15 EXHIBIT O - Owner(s) of Record of Affected Land and Substance to be Mined.

56. Mineral owners: The response is considered adequate.

6.4.21 EXHIBIT U – Designated Mining Operation Environmental Protection Plan

57. EPP for Waste Rock: The response is considered adequate at this time. However, if PAG material is to be stored above ground, it will require both primary and secondary containment, and likely a leak detection system.
58. Jurisdictional Agencies: The response is considered adequate.
59. Disposal, decommissioning, detoxification: The response is considered adequate.
60. Secondary containment: The response is considered adequate. The DRMS accepts the Applicant's commitment to constructing secondary containment with a capacity of 110% of the all the storage containers within a given area.
61. Pumped mine water: The response is considered adequate.
62. SPCC: The response is considered adequate. The DRMS accepts the Applicant's commitment to submit the SPCC plan prior to site development. The submittal of the SPCC must be done through our technical revision process.
63. Environmental Protection Plan: The response is not adequate. While the summary has been revised to reflect the use of Designated Chemicals, the narrative still does not adequately address the requirements of Rule 6.4.21(5)(a). Please provide a narrative describing the known potential to affect human health, property or the environment for each of the Designated Chemicals to be stored and used on site.
64. Environmental Protection Facilities: The response is inadequate and requires additional information. Section 6.4.21(7) of Exhibit U was revised, however it only provides a general discussion as it relates to the Filtered Tailings Storage Facility. As stated in the October 14th PAR, the Mill Facility, Reagent Storage Area, all storm water control structures, surface water diversions, and the Filtered Tailings Storage Facility including the underdrain system, starter buttresses and contact water pond have been designated as Environmental Protection Facilities. For each of these facilities, please revise the narrative giving and in depth facilities evaluation pursuant to 6.4.21(7). The narrative should be specific to each facility and address all requirements of that rule. Additionally, please commit to addressing the engineering specifications, construction schedule, QA/QC protocols and incremental inspection schedules

through the Division's Revision Process prior to the construction of each Environmental Protection Facility.

65. Contact Water Pond transfer: The response is inadequate and requires additional information. The DRMS understands that pH neutralization and possible treatment of the contact water will not be required. The response did not indicate how water will be transferred from the Contact Water Pond to the mill for re-use. Please describe the method of delivery to be employed in transferring the Contact Water Pond to the Mill Facility.

66. Emergency Response Plan: The response is considered adequate.

67. Stormwater Management: The response is not adequate. In addition to the concerns in Comment 32, no water balance for the contact water pond was provided. Please provide the requested water balance, taking into account the concerns presented in Comment 69.

68. Figure 1: The response is considered adequate.

69. Climate: The response is not adequate. Regardless of accepted design practice, Rule 6.4.21(13)(b)(i) requires one set of data for the wettest year on record for the area. Furthermore, the requested water balance for the contact water pond was not provided (reference Comment 67). As no water balance was provided, it is not clear whether a probabilistic or deterministic approach is to be used, thus having an impact on whether or not the wettest year on record is to be needed. Please provide this data set.

70. Exfiltration pond: The response is not adequate. Immediately below is a screen capture from Section 6.4.21(14) on the top of p. 70 of the original submittal, which mentions discharge to an exfiltration pond.

> 2. Direct discharge via an exfiltration pond
>
> Evaporation within the contact pond. The report is provided in Appendix B.
>
> **[6.4.21(15)] Construction Schedule Information**
>
> No less than 30 days prior to commencement of GMR milling, the FTSF and ancillary structures will be constructed. The structures ancillary to the FTSF include the stormwater diversion channel that diverts stormwater from running into the FTSF area, FTSF monitoring wells and the contact water pond.

The same reference is on p. 77 of the revised submittal:

> Based on the seepage quality estimate, contact water can be discharged from the contact water pond through one or a combination of the following:
>
> 1. Recycle to the mineral process plant
> 2. Direct discharge via an exfiltration pond
>
> Evaporation within the contact pond. The report is provided in Appendix B.

If there is no such pond proposed, please remove it from the text. Otherwise, describe its purpose and show it on the Exhibit C maps.

71. Construction Schedule: The commitment to submit the detailed construction schedule upon receipt from the site development contractor and civil engineer is acceptable

72. Quality Assurance and Quality Control: The response is considered adequate.

73. Wildlife protection: The response is considered adequate.

6.5 GEOTECHNICAL STABILITY EXHIBIT

74. Missing stability analyses: The response is not adequate. The DRMS reference to Exhibit 6.5 relates to the Rule 6.5 in "Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for Hard Rock, Metal, and Designated Mining Operations" where requirements for stability analyses are provided. We apologize if this caused confusion.

    Your response stated: "FTSF Stability Evaluations are found in AMEC Section 9.3 beginning on page 33 of the report." This section only provides a seismic hazard assessment. No stability analyses were found, only a summary of results (*see pdf p. 148/AMEC report p. 35*). We require the analyses themselves. Furthermore, Section 9.3 references Appendix H, which is the NRCS soil survey (as indicated in the Table of Contents List of Appendices – the appendices themselves were not received by the DRMS). Finally, as stated in our October 14, 2021 PAR, none of the 10 appendices listed in the Appendix E Design report were included with the original submittal. The analyses we require may very well be in one or more of those appendices, but we cannot review what we don't have.

    The Division requires stability analyses for both the FTSF and the Contact water Pond embankment. Please provide these stability analyses.

75. Blasting: The response to submit a blasting plan as part of a subsequent adequacy response is acceptable.

Appendix A

76. Ventilation raise: The response is considered adequate.

77. Figure 2: The response is considered adequate.

Appendix B

78. Interim Status: The response is considered adequate.

79. Development rock: The response is considered adequate.

80. Geochemistry Sample locations: The response id not adequate. Your response states "Core locations are provided in the GEM report in Table 1: Geochemistry Sample Description". The only identifying information found in Table 1 is the "Hole ID", which is not a location. Please provide a map showing the location of each sample.

81. Long-term seepage: The response is considered adequate.

Appendix E

82. Windy Gulch: The response is considered adequate.

83. Technical Specifications: Thank you for providing the technical specifications. The DRMS has reviewed these document and has the following question:

a) Section 02200, paragraph 4.5.2 describes how "underdrain tailings" are to be placed. There is no definition for this material in Section 02200. What are underdrain tailings?

84. Seepage and Contact Water Management: The response is considered adequate.

85. Underdrain System: The response is not adequate. As stated in Comment 74, none of the 10 appendices listed in the Appendix E/AMEC Design report were included with the original submittal (excepting the technical specifications requested in Comment 83). Please provide the analyses.

86. Underdrain extents: The response is considered adequate. The DRMS accepts the Applicant's commitment to extend the underdrain to the edge of the FTSF.

87. Starter Buttress: The response is not adequate. The DRMS understands the starter buttress is not to be constructed using tailings material. The concern is related to the gradation, placement and compaction of the proposed granite material, such that voids large enough to allow the migration of the much finer grain and non-plastic filtered tailings is avoided over time. Please provide designs demonstrating how fine particle (tailings) migration will be prevented through the rock fill starter buttress (e.g., Terzaghi filter criteria).

88. Diversion drop structures: The response is considered adequate. The DRMS accepts the Applicant's commitment to limit gabion baskets to where the surface water structure is temporary; and replace them with grouted structures where the structure is required post-reclamation.

89. Contingency tailings storage and management: The response is considered adequate.

90. Riprap: The response is considered adequate.

91. Geotechnical Monitoring: The response is considered adequate. The DRMS accepts the Applicant's commitment to formalize the FTSF performance assessment methods in AMEC's Section 10.4 prior to commencement of construction of the FTSF. The submittal of the FTSF performance assessment methods must be done through our technical revision process.

92. Instrumentation plan: The response is considered adequate.

Appendix K

93. Incomplete groundwater sampling: *See note below Comment 98.*

94. Field sheets: *See note below Comment 98.*

95. Field sampling: *See note below Comment 98.*

96. Field QA/QC procedures: *See note below Comment 98*.

97. Field filtering and preservation: *See note below Comment 98.*

98. Laboratory report Dated October 2014: *See note below.*

Note: The Applicant has acknowledged the deficiencies of items 93 – 98 and will address these items through the new baseline study.

General Comments

99. The Division received 200 letters of objection, provided to you via file share. No response was provided. Please provide responses to relevant concerns and comments.

100. Rule 1.6.2(1)(e) Notices: The response is considered adequate.

101. Additional changes to Application: The response is considered adequate.

102. Agency comments: No response required.

Please remember that the decision date for this application is March 31, 2022. As previously mentioned if you are unable to provide satisfactory responses to any inadequacies prior to this date, it will be your responsibility to request an extension of time to allow for continued review of this application. If there are still unresolved issues when the decision date arrives and no extension has been requested, the application may be denied. If you have any questions, please contact me at (303) 328-5229.

Respectfully,

Timothy A. Cazier, P.E.
Environmental Protection Specialist

ec: Michael, Cunningham, DRMS
Patrick Lennberg, DRMS
Lucas West, DRMS
DRMS file
Angela Bellantoni, PhD, EAI