

Cross Shaft Surface Depression Remediation

1 message

Daniel Takami <danieltakami@gmail.com>

Mon, Oct 31, 2022 at 9:15 AM To: Patrick Lennberg - DNR <patrick.lennberg@state.co.us>, Sergio Rivera <sergio.rivera@novametallix.com>, Richard Mittasch <rmittasch@nedmining.com>

Patrick,

Enclosed is the Cross shaft surface depression remediation report providing details of the remedial activities performed in compliance with DRMS's request. If you have any questions please feel free to contact me.

Respectfully,

Daniel J. Takami

President, Sustainable Metal Solutions, LLC President, Nederland Mining Consultants Inc. President, Grand Island Resources, LLC danieltakami@gmail.com 501.256.4444

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2	Signed Cross Depression 2285K	Reclamation	Letter Re	eport.pdf
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October 31, 2022

Division of Reclamation, Mining & Safety c/o Mr. Patrick Lennberg 1001 E 62nd Ave, Room 215 Denver, CO 80216

RE: Cross Gold Mine, Permit No. M-1977-410, Cross Shaft Surface Depression Remediation

Mr. Lennberg,

On June 10, 2022, Grand Island Resources (Operator) requested approval from DRSM to perform reclamation of a surface feature consisting of a land depression that had the potential of increasing surface water influx into the underground workings of the Cross Mine. The Operator discussed remediation details and rationale with DRMS on June 3, 2022, during a Site Inspection. DRMS approved the request on June 23, 2022.

The proposed work consisted of re-establishing the natural surface topography and natural surface drainage via backfilling, slope, topsoil placement, and revegetation, in accordance with Amendment #2.

This Letter Report provides details of the remedial activities performed by the Operator and complies with Per DRMS request *"Provide the Division photographic documentation of the activities during and post remediation and a brief summary of when activities began and ended, and approximately how much material was used for remediation."*

Remediation Summary

Start Date Activity: August 1, 2022

End Date Activity: August 12, 2022

Materials and Quantities:

- Waste rock as backfilling material, 1,500 yrd3



- Rocky mountain native seed mix per AM-2 description, 16 lbs. (Table 3)
- Biosolid soil amendment, 100 lbs.
- Triton Environmental WinterstrawTM, erosion control blankets, 7 rolls 112.5'x8'

Activities Narrative

On the 1st of August, the activity began with clearing an equipment access path to the depression (excavator and dump trucks). Sequential backfilling and fill material activities were performed. Upon reaching the lower rim of the depression, compaction was increased via excavator tracking. The final slope of the reclaimed slope was graded to a slope of 2 horizontal to 1 vertical in accordance with Amendment #2.

Revegetation of the filled depression and access path were covered with a layer or screened soil mixed with soil amendments. A native seed mix was broadcasted over the amended soil mix at approximately 1lbs per 1,000 square feet. To prevent erosion while vegetation is established, erosion control blankets were placed over the reclaimed area.



Detailed Activities

Depression Backfill narrative per	Actual Depression backfill activity
AM-2	
The historic shaft disturbance, shown in	The proposed work consists of re-
Exhibit E, maps 5 and 8, will be	establishing the natural surface
reclaimed using waste rock.	topography and natural surface drainage
	via backfilling, slope, topsoil
	placement, and revegetation, in
	accordance with Amendment #2.
	Rock was used as backfill material
The depression in this area will be	2:1 slope was achieved.
regraded to 2:1, re-vegetated using local	
topsoil, and covered with a sub- alpine	
seed mix.	Screened soil + 100 lbs. biosolid forte
	fertilizer and soil amendment was
	placed over the rockfill (subgrade)prior
	to revegetation.
	Sub-alpine seed mix per AM-2 was
	broadcasted over the reclaimed surface.
Surfaces for revegetation will be	Revegetation surfaces had roughed
roughed to gain a mechanical bond	finish through the backfilling activities
between the subgrade and the replaced	and layered with amended soil upon
topsoil. Where the subgrade is of	retreat of the construction equipment.
acceptable quality, it may include disc	Disc plowing was not required and was
plowing the topsoil and subgrade	also not employed for safety reasons.
together where there is access and safety	
is not compromised.	
	AM-2 The historic shaft disturbance, shown in Exhibit E, maps 5 and 8, will be reclaimed using waste rock. The depression in this area will be regraded to 2:1, re-vegetated using local topsoil, and covered with a sub- alpine seed mix. Surfaces for revegetation will be roughed to gain a mechanical bond between the subgrade and the replaced topsoil. Where the subgrade is of acceptable quality, it may include disc plowing the topsoil and subgrade together where there is access and safety



AM-2	Depression Backfill narrative per	Actual Depression backfill activity
Section	AM-2	
	The seedbed will be loosened (four to	After compaction of the backfill area a
		1
	six inches (4" to 6") deep) and	layer of screened soil was loosely laid
	smoothed.	over the fill prior to seeding, fertilizing
		and erosion control.
	GIR will replace topsoil in as even a	Amended soil was used for reclamation.
	manner as equipment allows. Topsoil	
	will be sourced locally in Nederland, CO	
	(approximately 264,492 ft3 (9,796 yd3).	
	Because of the shallow, cobbly and	
	rocky soil types at this site, there is no	
	available site soil for reclamation.	
	Soil amendments will be as	The seed vendor, Arkansas Valley
	recommended by the local NRCS.	Seed, which is also used by DRMS and
	Currently, they recommend that if soil	is familiar with the area, recommended
	tests are not performed, forty (40)	the use of 100 lbs Biosol Forte soil
	pounds per acre of each of the major	amendment and fertilizer for the 0.5
	nutrients (nitrogen and phosphoric acid	acre of disturbed area. The biosol was
	[H3PO4]) be applied. If phosphoric	mixed with the cover material.
	acid is applied, it will be applied on the	
	overburden prior to plant growth	
	medium replacement. This nutrient is	
	not mobile. Placing it in the root zone	
	prior to plant growth medium	
	replacement will ensure optimal	
	utilization by plant roots.	
	Soils having been compacted by traffic	As loose screened soil layer was place
	or other equipment will be tilled	over the compacted fill material, no
	(approximately 0.7387 acres) (deep	tilling was requried.



AM-2	Depression Backfill narrative per	Actual Depression backfill activity
Section	AM-2	
	chiseled or ripped if necessary) breaking	
	up restrictive or compacted layers, and	
	then harrowed and rolled or packed to	
	produce the required firm seedbed.	
	Seed will be drill seeded. The seedbed	Seed was hand-seeder broadcasted over
	will be settled and fairly firm, but left	the amended soil.
	rough enough to catch the seed and	
	allow some coverage by soil when	
	tracked in by equipment or harrowed	Approximately 30 lbs of seed per acre
	and packed into the soil surface.	was used per the vendors
	Seedbed preparation will be avoided	recommendations.
	when the soil is wet to prevent seedbed	
	compaction.	
	Topsoil will be replaced to a depth of 8	Amended soil was placed prior to
	to 12 inches in most areas	seeding.
	(approximately 3.5439 acres [Costs in	
	Appendix III reflect soil to 12	
	inches.]). This includes the Cross-	
	Caribou mine, Potosi Shaft, and Caribou	
	300 Portal areas. Soil will need to be	
	deep enough to encourage root growth.	
	Because this is an underground mine, no	The operation did not conduct backfill
	overburden was removed and none will	activities as would be for an open pit or
	be replaced.	strip mine.



AM-2	Depression Backfill narrative per	Actual Depression backfill activity
Section	AM-2	
	The operation will not conduct backfill	
	operations as one would expect for open	
	pit or strip mine.	
	There is always the possibility some	This project is considered to be a minor
	minor backfilling may occur (ponds).	backfilling activity.
	Where backfilling should occur, it will	
	be done in such a manner that the	
	backfilled material will be appropriately	The backfilled material was properly
	compacted to prevent slippage or	layered and sequentially compacted
	settling, provided it can be done in a	with the excavator in a safe manner.
	manner not endangering operators and	
	equipment.	
No toxic or acid forming material will		The waste rock on site was used, which
be backfilled on site. Therefore, leaching		has undergone ABA testing.
of toxic or acid forming materials shall		
not occur.		
		The screened soil underwent Soil test
		analysis. The test results show no toxic
		or acid forming material were present.
Section 1.10	The seed and planting mixes suggested	The recommended seed mix was
(page 10)	below were developed from the	presented to Arkansas Valley Seeds,
Seed Mixes	vegetation descriptions contained in	which prepared the mix for Grand
	Exhibit B, recommendations from	Island Resources. No trees or shrubs
	DRMS, and reports from O'Shea-Stone	were planted.
	and Ash (2008). Seeds and plantings	
	may change because of availability at	
	the time of reclamation or if site	
	conditions change. Revegetation will be	



AM-2	Depression Backfill narrative per	Actual Depression backfill activity
Section	AM-2	
	primarily to restore areas to meadow	
	conditions not to replace all trees and	
	shrubs.	
	The designated seed mixture will be	The seed was sown uniformly using
	sown uniformly on the prepared areas	handheld seed spreaders. This occurred
	during the fall to take advantage of	during late summer/early fall while the
	winter moisture and cover. Seeding shall	ground was not frozen.
	not be conducted if the ground is frozen.	
	The seedbed will be settled and fairly	The seedbed was firm, but rough
	firm, but left rough enough to catch the	enough to accept seeding.
	seed.	
	The seed mix recommended by the	The DRMS recommended seed mix
	DRMS Inactive Mine Lands Program	was presented to Arkansas Valley
	for high elevations will be used for	Seeds, which prepared the mix for
	revegetation. The following seed mix	Grand Island Resources.
	(Table 3) is the DRMS recommended	
	reclamation seed mix from Table 20-5	
	DRMS (2009) and is the suggested seed	
	mix for areas above 9,000 ft. to	
	timberline and contains species currently	
	at the site.	
	Seed will be drilled. The seeded areas	Seed was spread with a seed spreader.
	will be hydro mulched and crimped or	Hydro mulching operations were not
	tacked to control wind and water	conducted due to safety constraints and
	erosion.	to prevent additional disturbance
		required by the hydroseeding
		equipment.
		* *



AM-2	Depression Backfill narrative per	Actual Depression backfill activity
Section	AM-2	
		Erosion control blankets were used, instead. The blankets secured with stakes and rocks.
	Because these are fertile, mountain soils, we do not intend to routinely take subsoil and topsoil soil samples for analysis. However, where soil amendments are necessary, they will be	100 lbs. of Biosolid Forte soil amendment and fertilizer for the 0.5 acre of disturbed area, per recommendations of the seed vendor.
	applied as appropriate (see Exhibit D, Section1.10).	The Operator will monitor vegetation establishment success on regular basis and will reseed as necessary to achieve project objectives.



Table3			
Subalpine Vegetation Areas {9,000' to tree line}			
The below rates are for drilled seeding. The rates for broadcast seeding are double the drilled rate.			
Species	Scientific Name	Variety	lbs/acre
Yarrow*	Achillea lanulosa	-	0.1
Groundsel	Senecio atratus	-	0.1
Lupine	Lupinus alpestris	-	LO
Slender wheatgrass	Elymus trachycaulus	San Lois	1.4
Nodding brome	Bromus anomalous		2.5
Sheep fescue	Festuca ovina	Cover	0.5
Hard fescue	Festuca ovine duriuscula	Durra	0.5
Red fescue	Festuca rubra	Penn lawn	0.5
Tufted hairgrass	Deschampsia caespitosa		0.5
Species	Scientific Name	Variety	lbs/acre
Redtop	Agrostis alba		0.1
Blue wildrye	Elymus glaucus		1.15
Mutton grass	Poa fendleriana	San Lois	0.5
TOTAL pls lbs./acre (drilled)			9.45

*To be bagged separately from mix. Bag to be attached outside of primary seed bag.



Pre-Remediation Photographs





During Reclamation and Post-Remediation Photographs





















GRAND ISLAND RESOURCES





If you have any questions, please contact me.

Respectfully,

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