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## Reply to Additional Information Required, 3rd quarter 2022 Ground and Surface Water Monitoring Report

1 message

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**Daniel Takami** <danieltakami@gmail.com>

Sat, Jan 7, 2023 at 12:58 PM

To: Patrick Lennberg - DNR <patrick.lennberg@state.co.us>

Cc: Sergio Rivera <sergio.rivera@novametallix.com>, Je'an-Paul Brewer <jpbrewer@nedmining.com>

Patrick,

Enclosed is our response to DRMS's letter dated December 9, 2022. Please let us know if you have any questions.

Respectfully,

**Daniel J. Takami**

President, Sustainable Metal Solutions, LLC

President, Nederland Mining Consultants Inc.

President, Grand Island Resources, LLC

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**2022.12.09 DRMS SW GW Additional Information Signed Response - v1r0a.pdf**

615K

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

**RE: Additional Information Required No. 2, 3<sup>rd</sup> Quarter 2022 Groundwater and Surface Water Monitoring Report; Cross Gold Mine, Permit No. M-1977-410**

Dear Mr. Lennberg:

This is in response to DRMS letter dated December 9, 2022. The letter in reference indicates that *“On December 1, 2022, the Division of Reclamation, Mining and Safety (Division/DRMS) received your responses to the Division’s request for additional information dated November 8, 2022, for the 3<sup>rd</sup> Quarter 2022 Groundwater and Surface Water Monitoring Report for the Cross Gold Mine. After review of the submission the Division has additional items that need to be addressed or clarified.”*

**DRMS COMMENT:**

**General**

1. *In the Operator’s response to the Division’s question #1, it is stated duplicate samples for groundwater and surface water locations were collected in September and effluent duplicate samples will be collected beginning in October. In the narrative sections for groundwater and surface water sampling it does not mention that duplicate samples were collected. Additionally, the only way the Division was able to verify that duplicate samples were collected was to review the field sheets. For future reporting, please include a narrative section that explains where duplicate and other QA/QC samples were collected. Finally, update the September sample result tables to include the results of the duplicate sample and clearly state what the parent sample for the duplicate was.*

**GIR RESPONSE:**

- 1.a) GIR will include in future reports narrative pertaining to Duplicate and other QA Sample Collection.
- 1.b) GIR will going forward, include on the monthly results tables duplicate sample results.
- 1.c) the September Sample Results Table below provides the duplicate sample results.



## Groundwater Test Results – September 2022 - Updated

The highlighted cells indicate test results higher than the reference values from Reg. 5 CCR 1002-41

**DRMS COMMENT:****General**

2. *Rinsate samples are collected to assess the adequacy of the decontamination process. If disposable one-time use or dedicated equipment is used to collect water samples then a rinsate sample is not needed but the field sheets should reflect the use of such equipment. However, if sampling equipment, including but not limited to buckets or dippers, are used on multiple sites then a rinsate is warranted. As stated above, a section in future reports should be included to describe which QA/QC were collected and an explanation why other samples were not collected or needed. Please note sample result tables need to include the results of the QA/QC samples.*

**GIR RESPONSE:**

GIR will utilize disposable one-time use equipment to collect water samples; this will be noted on the Field Sheets.

Should temporary equipment (non-single-use or disposable) be required, on occasion, due to field conditions, GIR will note the Field Sheets and Rinsate Samples will be collected and tested.

**DRMS COMMENT:****Groundwater**

3. The Division is seeking an explanation as to why the Winze groundwater elevation changes dramatically, from 9605' to 9667', between the August and September sampling events.

**GIR RESPONSE:**

From August 22nd to September 16th, rehabilitation work on the Cross Adit and Snowshed was conducted by mine operations; as a result, the power supply to the Winze Pump was disconnected and therefore no mine dewatering occurred during that period of time. It is likely that groundwater recovered as a result to the levels observed.

GIR appreciates the opportunity to submit clarification regarding our 3<sup>rd</sup> Quarter Water Collection and Testing in accordance with Technical Revision 10 (TR10).

Respectfully submitted

Grand Island Resources, LLC



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