
Request for Technical Revision 13

1 message

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Mon, Jun 12, 2023 at 12:00 PM

To: Patrick Lennberg - DNR <patrick.lennberg@state.co.us>, Sergio Rivera <sergio.rivera@novametallix.com>, Je'an-Paul Brewer <jpbrewer@nedmining.com>

Patrick,

Enclosed is our request for Technical Revision #13 (TR13) from Grand Island Resources, LLC. The changes address inconsistencies between sections 7.5 and 6.2 of the original Technical Revision #10 (TR10) document regarding field blank sample collection. To resolve the confusion, TR13 proposes collecting a single field blank sample per sampling event, regardless of the event's duration. Please let me know if you have any questions.

Respectfully,

Daniel J. Takami

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President, Nederland Mining Consultants Inc.

President, Grand Island Resources, LLC

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*****Confidentiality Statement*****

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M-1977-410_TR13 - Final.pdf

648K



COLORADO DIVISION OF RECLAMATION, MINING AND SAFETY

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REQUEST FOR TECHNICAL REVISION (TR) COVER SHEET

File No.: M- _____ Site Name: _____

County _____ TR# 13 (DRMS Use only)

Permittee: _____

Operator (If Other than Permittee): _____

Permittee Representative: _____

Please provide a brief description of the proposed revision: _____

As defined by the Minerals Rules, a Technical Revision (TR) is: “a change in the permit or application which does not have more than a minor effect upon the approved or proposed Reclamation or Environmental Protection Plan.” The Division is charged with determining if the revision as submitted meets this definition. If the Division determines that the proposed revision is beyond the scope of a TR, the Division may require the submittal of a permit amendment to make the required or desired changes to the permit.

The request for a TR is not considered “filed for review” until the appropriate fee is received by the Division (as listed below by permit type). Please submit the appropriate fee with your request to expedite the review process. After the TR is submitted with the appropriate fee, the Division will determine if it is approvable within 30 days. If the Division requires additional information to approve a TR, you will be notified of specific deficiencies that will need to be addressed. If at the end of the 30 day review period there are still outstanding deficiencies, the Division must deny the TR unless the permittee requests additional time, in writing, to provide the required information.

There is no pre-defined format for the submittal of a TR; however, it is up to the permittee to provide sufficient information to the Division to approve the TR request, including updated mining and reclamation plan maps that accurately depict the changes proposed in the requested TR.

Required Fees for Technical Revision by Permit Type - Please mark the correct fee and submit it with your request for a Technical Revision.

<u>Permit Type</u>	<u>Required TR Fee</u>	<u>Submitted</u> (mark only one)
110c, 111, 112 construction materials, and 112 quarries	\$216	<input type="checkbox"/>
112 hard rock (not DMO)	\$175	<input type="checkbox"/>
110d, 112d(1, 2 or 3)	\$1006	<input type="checkbox"/>



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Section 1: Introduction and Description of the Site

Introduction

This document, known as Technical Revision #13 (TR13), is an official submission from Grand Island Resources, LLC (GIR), detailing the proposed adjustment to Water Collection Protocols described in Technical Revision #10 (TR10) for the Grand Island Resources Cross/Caribou Site.

The proposed adjustment pertains specifically to the collection of a Single Field Blank Sample, whether a sampling event takes place in one day or more than one consecutive days. Inconsistent narrative found in Section 7.5 Groundwater and Surface Sampling QA/QC (Revised Monitoring Plan) and Section 6.2 Field Blanks (Standard Operating Procedure Groundwater, Surface Water and Effluent Sample Collection and QA/QC) of the TR10 Original Document dated April 26, 2022, has created confusion and sampling inconsistencies. TR10 resulted from MLR Board Order issued to Grand Island Resources (the Operator) on February 18, 2022.

Site Location

The Cross-Caribou mine site, owned by GIR, is situated approximately four miles northwest of Nederland, Colorado, and adjoins the Roosevelt National Forest. The site is positioned at an elevation of approximately 9,700 feet above mean sea level (MSL). The location is specifically described as being in Section 9, Township 1 South, Range 73 West of the 6th Principal Meridian, County of Boulder, State of Colorado. As of now, the property is not engaged in active mining operations. The latest revision to the mine permit M-1977-410 occurred through Amendment No. 2 (AM-2), which was approved in February 2022.



Section 2: TR10 Field Blank Narratives

7.5 Groundwater and Surface Sampling QA/QC (Revised Monitoring Plan)

“... To ensure data defensibility and to prevent any shipping or laboratory error or cross contamination, a trip a field blank of distilled water provide by the laboratory to be taken to the field for each container; a duplicate from one sample location to determine laboratory reproducibility; a field blank at each location using distilled water pour at each respective site...”

6.2 Field Blanks (Standard Operating Procedure Groundwater, Surface Water and Effluent Sample Collection and QA/QC)

“... Collect one field blank sample for every 20 samples primary collected, so that a rate of at least 5 percent of primary samples collected is achieved. For example, if you collect from 1 to 20 primary samples during a sampling event, collect one field blank sample; and if you collect from 21 to 40 primary samples during a sampling event, collect two field blank samples....”

Proposed Narrative

GIR will collect a Single Field Blank Sample, whether a sampling event takes place in one day or more than one consecutive days.