

STATE OF
COLORADO

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

Modification of Water Collection Frequency

1 message

Daniel Takami <danieltakami@gmail.com>

Wed, Jan 31, 2024 at 9:57 AM

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

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

Patrick,

Enclosed is our request for modification of water sample collection frequency and sampling points. We have collected and analyzed, via third party laboratory, 21 contiguous months (essentially 7 quarters) of site waters from the 7 monitoring points which were determined by DRMS. We consider that our obligation to provide DRMS with five consecutive quarters of groundwater monitoring data from the 7 sampling points has been met; water quality data indicates consistency for all WQCC's parameters and standards, and, therefore we request approval from DRMS to adjust the current sample collection from Monthly Sampling to Once per Quarter Sampling.

Respectfully,

Daniel J. Takami

President, Sustainable Metal Solutions, LLC

President, Grand Island Resources, LLC

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**Jan 31, 2024 - Request for Water Sample Frequency - Final.pdf**

590K



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

January 31, 2024

**RE: Request for Modification to Water Sample Collection Frequency and Sampling Points
- Cross Gold Mine, Permit No. M-1977-410.**

Mr. Lennberg,

On April 28, 2022, the Division of Reclamation, Mining and Safety (Division) approved Technical Revision application (TR-10) filed with the Division on February 28, 2022, addressing the following: *Modify the water management and treatment program and provide a surface water and groundwater monitoring program (in accordance with corrective action #1 of the Board Order issued for Violation No. MV-2021-017).*

The terms of TR-10 approved by the Division were thereby incorporated into Permit No. M-1977-410. All other conditions and requirements of Permit No. M-1977-410 remain in full force and effect. Grand Island Resources (The Operator) will need to provide five consecutive quarters of groundwater monitoring data that include all sampling parameters and standards required by WQCC's *"Interim Narrative Standard"*.

The Operator initiated the mandated water sample collection and testing in May of 2022. Upon review of the 2nd Quarter 2022 Report filed by the Operator, DRMS identified that the program being implemented by the Operator did not fully address DRMS' expectation and requested modifications to the program. The Operator improved the program on a continued basis working closely with DRMS. The Operator has collected and analyzed, via third party laboratory, 21 contiguous months (essentially 7 quarters) of site waters from the 7 monitoring points which were determined by DRMS. The Operator considers that their obligation to provide DRMS with five consecutive quarters of groundwater monitoring data from the 7 sampling points has been met; water quality data indicates consistency for all WQCC's parameters and standards, and, therefore, the Operator requests approval from DRMS the following adjustments to the current program:

Adjustment to Sampling Frequency

The Operator requests that the current sample collection is adjusted from Monthly Sampling to Once per Quarter Sampling.



Adjustment to Sampling Points

The Operator requests that the current 7 sample collection points (3 groundwater wells [Cross, Caribou and Compliance], 2 mine effluent points [Cross and Caribou Portals] and 2 surface water stations [one upstream and one downstream of the mine site], are adjusted to a single sample point for the site located at the Compliance Well.

Respectfully Submitted,

Daniel J. Takami
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