STATE OF COLORADO

Girardi - DNR, Chris <chris.girardi@state.co.us>

Farmers Sand Application M2024057- Responses to Objections

1 message

Lisa Shea <lshea@erccolorado.net> Mon, Apr 21, 2025 at 1:31 PM
To: "Girardi - DNR, Chris" <chris.girardi@state.co.us>
Cc: Jared Ebert - DNR <jared.ebert@state.co.us>, Scott Edgar <Scott@farmersres.com>, Shelly Hoover <shoover@erccolorado.net>, "Todd Messenger (tmessenger@fwlaw.com)" <tmessenger@fwlaw.com>, Katie Moisan <KMoisan@fwlaw.com>

Chris,

Please find attached our letter with responses to the objections for the subject mine permit application. Please let Shelly or me know if you have any questions.

Lisa Shea

Ecological Resource Consultants, LLC

ERC

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April 21, 2025

Chris Girardi
Environmental Protection Specialist
Colorado Division of Reclamation, Mining & Safety
1313 Sherman Street, Room 215
Denver CO 80203
Chris.Girardi@state.co.us

RE: Farmers Sand File No. M-2024-057 – Objection Responses

Dear Chris,

The following document addresses the objections submitted to the Colorado Division of Reclamation, Mining and Safety (DRMS) regarding the mining permit application for Farmers Sand (File No. M-2024-057). To enhance clarity and prevent redundancy, the responses are organized by categories rather than by individual objection, as several similar comments were made by multiple objectors.

Aesthetics - Obstruction of View

There were objections that mining will negatively impact the view from properties that are located to the west of the Farmers Sand site. The Farmers Reservoir and Irrigation Company ("FRICO"), which owns Milton Reservoir, is dredging the lake to remove decades of accumulated sediments that affect the capacity of the reservoir. That dredging operation is allowed by law and also represents an obligation that FRICO has to its stockholders.

The visual impacts complained of result from the stockpiles of materials necessitated by the ongoing dredging operations, which do not require a DRMS permit. The DRMS permit will allow Farmers Sand to remove the materials from the site, which will actually tend to mitigate the visual impacts because the removal of materials will draw down the stockpiles over time.

In the absence of a mining permit, the stockpiles will be maximized to contain all dredged materials. Based on the amount of material that must be excavated from the reservoir, in some areas, stockpiles could grow to heights exceeding 100 feet. Below is a summary of active and planned stockpiles.

Area Map

- Existing Stockpile 1 – Stockpile 1 is within FRICO's property and sits close to but outside of the high-water level in the Milton reservoir. It is adjacent to the In-Res Settling Ponds, which facilitates efficient material transfer between the two facilities. Once the sand plant becomes operational (assuming a mining permit is obtained), processing and removing material from this stockpile will become a primary focus. It is anticipated that Stockpile 1 will be substantially depleted within one to two years as materials are processed and transported off-site. Thereafter, Stockpile 1 will remain active but on a reduced scale, serving as a temporary staging area where materials are stockpiled and directed to the sand plant. The West Stockpile will serve as a visual barrier to Stockpile 1 from the west. The West Stockpile will be seeded and monitored for vegetative growth such that it blends better into the existing landscape to have a similar aesthetic view of the existing conditions.

- Existing West Stockpile – This stockpile is positioned along the west side of the property next to land owned by the State of Colorado. The maximum height of this stockpile is approximately 40

feet. If FRICO is granted a mining permit, some materials from this stockpile will be removed, however, it may be beneficial to keep a portion of this stockpile to buffer between the sand plant and the residents to the west. The side slopes and finished surface of the stockpile will be seeded and mulched to establish native vegetation for blending into the surrounding land.

- North Stockpiles – Currently, there is one existing stockpile, designated **N1**, at the north end of the reservoir. This is where the active dredging operations are depositing materials. The goal over the next few years is to redirect dredged materials to **Stockpile 1**, with the intent of transferring them promptly to the sand plant and then onto trucks for off-site removal. This is contingent on FRICO successfully obtaining a mining permit.

  If a mining permit is not secured, all anticipated dredged material will be stored on-site, resulting in the expansion of the northern stockpiles to heights exceeding 100 feet. No applicable regulations limit stockpile height. The stability of the stockpiles is all that is required. To minimize dust and promote blending with the surrounding landscape, the stockpiles will be vegetated (seeded and mulched) during active filling operations. While the site's topography will be altered by the formation of these large mounds, views of the lake and the existing tree buffer from the west will remain unobstructed.

- Existing North Settling Ponds – These were designed and constructed to stay below the existing topography elevations in the area to preserve views from the west. Additionally, the outer pond slopes were seeded with a native seed mixture and mulched with the intention of achieving plant growth typical to the surrounding area. Plant growth is being monitored, and any reseeding/mulching or other necessary remedial measures will be taken to ensure strong plant growth such that these areas visually blend into the surrounding areas.

- Proposed South Settling Ponds - These were designed to stay below the existing topography elevations in the area to preserve views from the west. Similar to the north ponds, the slopes will be seeded and mulched to obtain surfaces that are visually consistent with the surrounding landscape.

Mining Operations End Date

At the current dredging production rate, the sediment removal process may take 20 years or more. However, if any economic, business, or permitting changes occur that render the project no longer feasible, operations may be suspended at any time. Regardless of the end date or temporary suspension of operations, the land will be reclaimed to meet DRMS standards and permit requirements.

Permits

FRICO has been actively working on obtaining a mining permit, Weld County Use by Special Review (USR) permit, and Air Pollution Emission Notice (APEN). FRICO already has four approved Certification to Discharge Under CDPS General Permit COR400000 Stormwater Associated with Construction Activity Permits and an Eagle Incidental Take Permit.

On June 15, 2021, the U.S. Army Corps of Engineers determined that "Milton Reservoir and associated wetlands, identified within your study area, are excluded waters and do not meet the definition of waters of the U.S. Based on the information submitted, the Corps has determined that no permit is required for activity (dredging) described in your permit application."

Air Quality

FRICO is working with the Colorado Air Pollution Control Division (APCD) on obtaining an Air Pollutant Emission Notice (APEN) for the mining operation dust emissions. In addition, FRICO is actively wetting disturbed areas (e.g. stockpiles, haul roads, etc.) with water to control dust emissions, revegetating areas (e.g. settling basin berms and areas of disturbance), and maintaining gravel on haul roads. FRICO will apply a soil binder to exposed slopes that are prone to wind erosion. The predominant wind direction is in an easterly direction, which is away from the Pelican Lakes Ranch residential neighborhood.

Traffic

All traffic related to the mining operations will access the site through the southwest corner of the property, where Weld County Road (WCR) 30 connects with Cavanaugh Road (WCR 43). It is expected that off-site transport trucks entering and exiting the site will have a 50 percent distribution rate, with trucks traveling both north-south and east-west. These trucks will travel minimally within the mine area, as the proposed sand plant and load-out stockpile are located near the entrance. Furthermore, the West stockpile will serve as a barrier, screening the Pelican Lake Ranch residents from the plant site and associated truck traffic, minimizing the impact on the nearby neighborhood.

Haul trucks moving within the mine site will travel along the existing haul roads as shown in the mine plan. Most of the hauling will consist of moving materials from the settling ponds to stockpiles.

In addition to the above, all heavy mining equipment used in connection with FRICO's mining operations will be transported exclusively via the bridge constructed by Chevron Corporation. Pursuant to that Letter Agreement dated March 7, 2025 between FRICO and the Beebe Draw Farms Authority, FRICO will not use any other bridges for the transportation of heavy mining equipment.

Traffic associated with the mining operations will not be allowed to access roads that enter Pelican Lakes Ranch development.

FRICO has commissioned a Traffic Study to support its county land use entitlements and will be implementing the requirements of the study as required by applicable Weld County regulations.

Speed limits in the mine area will be limited to 30 mph.

Noise

In conjunction with its county land use entitlements, FRICO has commissioned a Noise Study to assess the anticipated noise levels at the affected land boundaries and nearest residences due to the mining operation (dredging and material processing). The Noise Study will evaluate the worst case predicted sound levels and identify critical receptors based on complying with the Weld County Code, Chapter 14, Article IX – Noise. Upon completion of the Noise Study, FRICO will implement the requirements of the study to ensure compliance with the Weld County Code.

https://library.municode.com/co/weld_county/codes/charter_and_county_code?nodeId=CH14HEAN_ARTIXNO

Municipalities Within Two Miles – Beebe Draws Farms Authority and Pelican Lakes Ranch

Pelican Lakes Ranch is a residential subdivision. It is not constituted as a unit of government of any sort. The Beebe Draw Farms Authority was formed by agreement between two metropolitan districts that were formed pursuant to Title 32, C.R.S. Such agreements are authorized by C.R.S. § 29-1-203. The Beebe Draw Farms Authority is not constituted as a "municipality" because municipalities are created pursuant to specific procedures and requirements set out in Title 31, Article 2, C.R.S. Those procedures and requirements do not include agreements authorized by C.R.S. § 29-1-203.

Light Disturbance

In accordance with Colorado Parks and Wildlife's (CPW) nighttime artificial lighting recommendation, all outdoor lighting will be downcast and appropriately shielded, directed away from sensitive habitats, and in compliance with USFWS/American Bird Conservancy recommendations. In addition, lighting will be warm-spectrum LEDs (2200K–2700K) and lower correlated color temperatures (CCT<3000 Kelvin degrees) to minimize wildlife disturbance. Lighting of this spectrum is recommended by the National Park Service to maintain safety and minimize impacts on human health and wildlife. It is also consistent with the "five principles for responsible outdoor lighting" developed by DarkSky International. The down-shielding will funnel light downward (away from the sky) minimizing light pollution. FRICO will continue to have CPW involved with the planning process for this proposed project as it moves through the permitting and planning process, and throughout the mining operations. The use of shielding, directional controls, and warm color temperatures will minimize light disturbance while maintaining safe operations at the site. Maintenance of the existing west stockpile as a barrier between the operation and the residential uses to the West will further mitigate lighting concerns.

Wildlife Buffer Zones and Ecological/Wildlife Impact

Colorado Parks and Wildlife species activity mapping (SAM) identifies buffer zones and other distribution data for general wildlife species. Some wildlife use areas that are part of the SAM program fall within the proposed mining operation area. The specific CPW-mapped wildlife use areas within the mining areas and across the site are summarized in the Wildlife Report, Table 2 (Exhibit H). In addition, the Wildlife Report includes site-specific evaluation of wildlife habitat and use within the affected land based on existing vegetation communities, potential migratory birds, and potential federal and state listed threatened or endangered species and/or habitat that could exist on or immediately surrounding the affected land. This report evaluates the potential impacts of the proposed project on wildlife and vegetation communities within the site. This report was prepared to support the 2024 Mine Plan permit application (Revised March 2025).

Colorado Parks and Wildlife reviewed the proposed project (Farmers Sand - Division of Reclamation, Mining and Safety Mine Permit (File No. M-2024-057)) and provided comments in a letter dated January 4, 2025 (herein, "2025 CPW Letter."). This revised Wildlife Report incorporates wildlife protective measures and recommendations outlined in the 2025 CPW letter. FRICO will continue to involve CPW in the planning process for this proposed project as it moves through the permitting and planning processes, and throughout the mining operations.

Lack of Notification of Mining Operation

In accordance with *Mineral Rules and Regulation of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials, Section 1.6.2 General Applicant Procedures*, the mining application notice was published in the Greeley Tribune on November 29, 2024, January 1, 8, 15, 22, and 25, 2025, and February 1, 8, and 15, 2025. A copy of the notice published in the Greeley Tribune was sent via certified mail to all owners of record of 1) the surface and mineral rights of the affected land, and 2) all land surface within 200 feet of the boundary of the affected land. The notices were sent via certified mail to all these owners on January 6 and 8, 2025 and again on January 28, 2025. The applicant has met its heavy burden under applicable law to provide notice.

Alleged Conflicts of Interest

Some objectors have suggested that Mr. Edgar's role as General Manager of FRICO and his role on the Beebe Draw Farms Authority Board ("Board") create a conflict of interest. As an initial matter, the relationship between Mr. Edgar's role as General Manager of FRICO and as Board member is not germane to the DRMS permit application and cannot be considered during application processing. However, DRMS should take comfort in the fact that there is no conflict of interest. At all times when a FRICO-related issue has come before the Board for a vote, Mr. Edgar has recused himself and an alternate director has taken his place. This consistent practice ensures that any potential conflict (or appearance of conflict) is

appropriately avoided. Moreover, the Board operates independently of FRICO and has its own legal counsel.

Land Dispute/Improper Transfer of Land

Some objectors have alleged that land was improperly conveyed by Beebe Draw Farms Authority to REI, LLC. REI, LLC's ownership is established by a deed that was recorded in the public records of Weld County on April 18, 2022, at Reception No. 4819699. Beebe Draw Farms Authority originally took title to the subject property by way of a series of warranty and special warranty deeds from REI, LLC. Consequently, the objectors' allegations regarding the propriety of the transfer push perilously close to slander of title.

More importantly, the objectors' allegations regarding the propriety of the transfer of land are not germane to the DRMS permit application and cannot be considered during application processing for the following reasons:

- DRMS is not the appropriate agency to resolve title disputes;
- The propriety of conveyances from the Beebe Draw Farms Authority to REI, LLC has not been challenged in Court, let alone adjudicated;
- No quiet title action against FRICO's property has been filed by a party asserting a superior title.

Illegal Operation

One objector contends, among other things, that FRICO has been operating "illegally, damag[ing] infrastructure, and endanger[ing] public health." These and related allegations are not supported by fact or law. First, FRICO has a right—and arguably an obligation—to dredge Milton Reservoir to remove decades of sediments and restore its decreed capacity. Second, the dredging operation, by itself, does not require permits at the federal, state, or county level. In fact, the U.S. Army Corps of Engineers has specifically disclaimed jurisdiction (see "Permits," *supra*), there are no applicable state permitting requirements, and Weld County Code § 8-12-30.D.6. specifically exempts reservoir cleaning from grading permit requirements. FRICO seeks a DRMS permit not to "legalize" its ongoing dredging operation (which will continue regardless of the outcome of the DRMS process), but to be cooperative with the legal interpretations applied by state and local regulatory authorities with respect to the sale of dredged materials and the transportation of those materials from the site over public roads.

Communications and Transparency

One or more objectors criticized FRICO regarding transparency. The critique is not germane to the DRMS permit application and cannot be considered during application processing. That said, DRMS should take comfort in the fact that Mr. Edgar hosted a town hall meeting at the Beebe Draw Farms maintenance building on February 26, 2025, during which he provided an hour-long presentation regarding the proposed project to approximately 50 people, some of which attended virtually. Additionally, all application materials are available for public review on the DRMS web site.

Lake Christina Sediment Accumulation

FRICO acknowledges that some solids from the cyclone/stockpiling process settled into the south bay of Lake Christina. This was not the intended outcome. The original plan was to direct water solely through the Evans #2 ditch, with its eventual outflow to the Gilmore Ditch.

FRICO, in agreement with Beebe Draw Farms Authority, has committed to removing these materials and began excavating this material out of Lake Christina in mid-March 2025. Excavation of the remaining materials is scheduled to occur after November 2025 when water levels recede and allow for continued work in the lake.

Upon examining the cut face (~2 feet thick) that was made during the initial excavation, two material stratums were noticeable: an upper few inches of a darker zone of wet fine sediment type materials (likely from the cyclone operation), and a lower, harder clay layer that appears to have accumulated and consolidated over time. Roots and organic matter were absent from the upper layer but observed in the lower layer further suggesting that the lower layer materials have been present in the basin for an extended period while the upper few inches represent the material that was recently deposited. FRICO will excavate beyond the estimated sediment thickness to ensure thorough removal of the materials. This process will occur over the next year as materials can only be excavated when the south bay is dry, which typically occurs during the non-irrigation season (November through March). Going forward, water generated from the mining operation will be directed to the Milton reservoir and prevented from entering Lake Christina.

Chemical Properties of Dredge Soils and Sediments

An assessment was carried out to evaluate the composition of the existing dredged materials. To characterize their chemical properties, soil samples were collected from the existing stockpiles (North, West, and Stockpile 1) as well as from the north settling basin located just west of Lake Christina. Additional samples were taken from the south bay of Lake Christina, as the sediment in this area consists of both material from dredging operations and earlier natural or historical deposits.

1. Existing Stockpiles - Six samples (N1-1, N1-2, W-1, W-2, 1-1, and 1-2) were collected on February 25, 2025.
2. Lake Christina - Four samples (LC-1, -2, -3, and -4) were collected on March 13, 2025.
3. North Settling Basin – One sample (LCE-1) was collected on March 26, 2025.

The following figure shows the location where samples were collected.

Sample Location Map

The soil testing was completed by eAnalytics in Loveland, CO and ALS Environmental in Houston, TX. The soil samples were analyzed using the following Environmental Protection Agency (EPA) Methods:

Category of Testing	EPA Test Method	Constituent
RCRA 8 Metals	SW6020A-SPLP	Arsenic (As), Barium (Ba), cadmium (Cd), Chromium (Cr), lead (Pb), Selenium (Se), and Silver (Ag)
	SW7470A-SPLP	Mercury
Semi-Volatile Organic Compounds (SVOC)	SW8270-SPLP	Existing Stockpiles - Tested for 11 Constituents
		Lake Christina/North Basin - Tested for 50 Constituents
Volatile Organic Compounds (VOC)	SW8260-SPLP	Existing Stockpiles - Tested for 57 Constituents
		Lake Christina/North Basin - Tested for 64 Constituents

Existing Stockpiles within the proposed mining area were sampled and analyzed for the typical SPLP (Synthetic Precipitation Leaching Procedure) analyte list to determine the potential for compounds to leach out of solid waste materials and into groundwater. Subsequent samples of Lake Christina related sediments were analyzed for the full list of volatile and semi-volatile compounds.

The test results were compared to the regulatory standards outlined in CDPHE's Code of Colorado Regulations, Regulation No. 41 (Table A and Tables 1 through 3) to determine whether any values exceeded the specified limits. Below is a summary of the results.

RCRA 8 METALS TEST RESULTS

EXISTING STOCKPILES:

- Ag, Cd, Cr, Pb, Se, As, and Hg were all below the Method Detection Limit (MDL).
- Ba concentrations were well below the regulatory standard.

LAKE CHRISTINA AND NORTH SETTLING BASIN:

- Cd, Ag, and Hg were detected at levels below the MDL.
- As, Ba, Cr, and Pb were present at concentrations well below the regulatory standard.

VOCs TEST RESULTS

EXISTING STOCKPILES:

- All constituents tested were reported at levels below the MDL.

LAKE CHRISTINA AND NORTH SETTLING BASIN:

- Although Colorado does not have specific regulations for Methylene chloride (MC) in soil, it was detected above the regulatory groundwater standard in samples LC-3, LC-4, and LCE-1.
- Vinyl acetate was detected in sample LC-4; however, no regulatory standard has been established for this constituent.
- The other 48 constituents reported were at levels below the MDL.

SVOCs TEST RESULTS

EXISTING STOCKPILES:

- All constituents tested were reported at levels below the MDL.

LAKE CHRISTINA AND NORTH SETTLING BASIN:

- Dimethyl phthalate was detected in all five samples; however, there is no regulatory standard currently established for this constituent.
- The results indicated that 63 of the 64 constituents reported were either below the MDL or detected at levels below the Quantitation Limit.

The following table is a summary of test results that included atypical or elevated detections.

Testing Category	Constituent	Units	CO Regulation 41 Standard	LC-1	LC-2	LC-3	LC-4	LCE-1
VOC	Methylene Chloride	ug/L	5.6	3.9	5	6.2	400	26
VOC	Vinyl Acetate	ug/L	No Standard	< 0.50	< 0.50	< 0.50	40	< 0.50
SVOC	Dimethyl phthalate	ug/L	No Standard	0.88	0.89	0.8	0.86	1.9

ug/L – micrograms per Liter

< - Less than the Method Detection Limit

The complete results of the soils testing are summarized on **Tables 1 through 6 in Exhibit A**.

Chemical Properties of Water Samples

In addition to the soil samples, water samples were collected from Milton Reservoir and Lake Christina for analytical testing. Two samples (LCS-1 and LCN-1) were collected from Lake Christina, and one sample was collected from Milton Reservoir. The water samples were analyzed using the following EPA methods:

- SW6020A (arsenic, barium, cadmium, chromium, lead, selenium, and silver) & SW7470A (Mercury) - Dissolved RCRA 8 Metals
- SW8260 - VOCs – Tested for 55 Constituents
- SW8270 - SVOCs – Tested for 66 Constituents

Below is a summary of the results.

- RCRA 8 Metals: All constituents were detected at concentrations below their respective regulatory standards.
- VOCs: All constituents were reported at levels below the MDL.
- SVOCs: All constituents were reported at levels below the MDL.

The results of the water testing are summarized on **Tables 1 through 6 in Exhibit B.**

Dredge Operation Use of Hazardous Substances

The only chemicals used in the operation—primarily fuels and oils—are those required to run the dredge, pumps (for moving material from the dredge to the surface and from the mixing tank to the cyclone), and earthmoving equipment such as bulldozers and haul trucks. No chemicals are added to the sand during the dredging, dewatering, or stockpiling processes. The chemicals stored on site are all within containment as shown in the table below. None of these chemicals are items that were identified in the soils or water testing.

Capacity (Gallons)	Container Type	Quantity	Material of Construction	Product Stored	Secondary Containment Type
8,000	AST	1	Steel	Diesel	Double-walled
5,000	AST	1	Steel	Diesel	Double-walled
2,000	AST	1	Steel	Diesel	Double-walled
2,000	AST	1	Steel	Diesel	Double-walled
500	AST	1	Steel	Gasoline	Double-walled
55	Drum	up to 3	Steel	Motor Oil	Plastic Pallet
55	Drum	up to 2	Steel	Hydraulic Oil	Plastic Pallet
55	Drum	1	Steel	Used Oil	Plastic Pallet
55	Drum	1	Steel	Brake Cleaner	Plastic Pallet
55	Drum	1	Steel	Waste Chemicals	Plastic Pallet

Chemical Analysis Key Points

- The laboratory analytical data indicates that the dredge material and reservoir water are not contaminated with toxic substances (VOCs, SVOCs, and RCRA 8 metals) and does not pose a human health and/or environmental risk.

- Results of the soils tests indicate that most constituents were either below the MDL or detected at levels below the Quantitation Limit with the exception of methylene chloride.

- Methylene chloride was detected in the Lake Christina and North Settling Basin sediments. It is unclear as to the origination of the methylene chloride; however, methylene chloride is predominantly used as a solvent in paint strippers and removers; as a process solvent in the manufacture of drugs, pharmaceuticals, and film coatings; as a metal cleaning and finishing solvent in electronics manufacturing; and as an agent in urethane foam blowing. Methylene chloride is also used as a propellant in aerosols for products such as paints, automotive products, and insect sprays. O&G operations use it for well drilling, fracturing and cleaning equipment. It is not something that is used in the dredging process. Methylene chloride has possibly accumulated in the native soils in this area over time from some of the aforementioned uses.

- Dimethyl phthalate (DMP) was detected in the five samples from Lake Christina and the North Settling Basin; however, there is no regulatory standard currently established for this constituent. DMP was previously used in mosquito repellents, which may explain its presence in the analytical results. It is not used in the dredging process.

- Vinyl acetate was detected in sample LC-4 collected from the southeast side of Lake Christina. Products that contain vinyl acetate glues, adhesives, and packing materials. It is not used in the dredging process.

- None of the refined or stored products used or kept on-site contain methylene chloride, vinyl acetate, or dimethyl phthalate.

- Some brake cleaner products available in the past may have contained methylene chloride; however, likely did not contain vinyl acetate or DMP. As of 2024, MC has been removed from such products.

- "Waste chemicals" refer to residual materials resulting from excess or leftover stored substances. None of the three compounds in question are expected to be generated through these waste processes in concentrations that would result in detectable levels.

- FRICO is required to comply with the Spill Prevention, Control, and Countermeasure (SPCC) Plan, which mandates regular inspections and reporting to ensure containment systems and surrounding areas are well-maintained. Any necessary repairs or replacements must be promptly addressed to uphold high standards of housekeeping and environmental compliance.

We hope you find this letter helpful in addressing the objections submitted to DRMS regarding the mining permit application for Farmers Sand (File No. M-2024-057). Please let us know if you have any questions or comments.

Sincerely,
ECOLOGICAL RESOURCE CONSULTANTS

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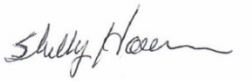

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cc: Scott Edgar, FRICO
Todd Messenger, Fairfield & Woods
Katie Moisan, Fairfield & Woods

EXHIBIT A
EXISTING STOCKPILES OF DREDGE MATERIALS
RESULTS OF ANALYTICAL TESTING

TABLE 1
FARMERS SAND MINING OPERATIONS
SOIL ANALYTICAL RESULTS

Volatile Organics-SPLP
Date Sampled: **2/25/2025**
Date Analyzed: **3/2/2025**
Method: **EPA 8260/SPLP**

Compound	Reg 41 Table A Standards (ug/L)	Reg 41 Table A Standards (mg/L)	Result (mg/L) Sample: N1-1	Sample: W-1	Sample: 1-1	Sample: 1-2	Sample: W-2	Sample: N1-2
2-Butanone (MEK)	NS	NS	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050
1,1,1,2-Tetrachloroethane	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,1,1-Trichloroethane	14,000 or 200M	14 to 0.2M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,1,2,2-Tetrachloroethane	0.18	0.00018	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,1,2-Trichloroethane	2.8 to 5M	0.0028 to 0.005M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,1-Dichloroethane	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,1-Dichloroethene	7	0.007M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,1-Dichloropropene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,2,3-Trichlorobenzene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,2,4-Trichlorobenzene	70M	0.07M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,2,4-Trimethylbenzene	67	0.067	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,2-Dibromoethane	0.018	0.00002	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
1,2-Dichlorobenzene	600M	0.6M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,2-Dichloroethane	0.38 to 5M	0.00038 to 0.005M	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
1,2-Dichloropropane	0.52 to 5M	0.00052 to 0.005M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,3,5-Trimethylbenzene	67	0.067	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,3-Dichlorobenzene	94	0.094	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,3-Dichloropropane	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
1,4-Dichlorobenzene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
2,2-Dichloropropane	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
2-Chlorotoluene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
4-Chlorotoluene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
4-Isopropyltoluene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Benzene	5.0M	0.005M	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001
Bromobenzene	56	0.056	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Bromochloromethane	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Bromodichloromethane	0.56	0.00056	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Bromoform	4	0.004	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Bromomethane	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Carbon tetrachloride	0.5 to 5M	0.0005 to 0.005M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005

Compound	Reg 41 Table A Standards (ug/L)	(mg/L)	Result (mg/L) Sample: N1-1	Sample: W-1	Sample: 1-1	Sample: 1-2	Sample: W-2	Sample: N1-2
Chlorobenzene	100M	0.1M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Chloroethane	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Chloroform	3.5	0.0035	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003
Chloromethane	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
cis-1,2-Dichloroethene	14 to 70M	0.014 to 0.07M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
cis-1,3-Dichloropropene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Dibromochloromethane	14	0.01400	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Dibromomethane	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Ethylbenzene	700M	0.7M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Hexachlorobutadiene	0.45	0.00045	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Isopropylbenzene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Methylene chloride	5.6 or 5M	0.0056 to 0.005M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
MTBE	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Naphthalene	140	0.140	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
n-Butylbenzene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
n-Propylbenzene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
sec-Butylbenzene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Styrene	100M	0.1M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
tert-Butylbenzene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Tetrachloroethene	17 or 5M	0.017 to 0.005M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Toluene	560 to 1,000M	0.56 to 1M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Total Xylenes	1,400 to 10,000M	1.4 to 10M	<0.015	<0.015	<0.015	<0.015	<0.015	<0.015
trans-1,2-Dichloroethene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
trans-1,3-Dichloropropene	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Trichloroethene	5M	0.005M	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Trichlorofluoromethane	NS	NS	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Vinyl chloride	0.023 to 2M	0.000023 to 0.002M	<0.002	<0.002	<0.002	<0.002	<0.002	<0.002

Notes:

NS - No Standard

M - Drinking Water Maximum Contaminant Level (MCL)

ug/L - micrograms per Liter

mg/L - milligrams per Liter

< - Less than the Laboratory Reporting Limit

TABLE 2
FARMERS SAND MINING OPERATIONS
SOIL ANALYTICAL RESULTS

Semi-Volatile Organics-SPLP
Date Sampled: **2/25/2025**
Date Analyzed: **3/3/2025**
Method: **EPA SW8270**

Compound	Reg 41 Table A Standards (ug/L)	Laboratory Reporting Limit (ug/L)	Result (ug/L)					
			Sample: N1-1	Sample: W-1	Sample: 1-1	Sample: 1-2	Sample: W-2	Sample: N1-2
2,4,5-Trichlorophenol	700	5.0	ND	ND	ND	ND	ND	ND
2,4,6-Trichlorophenol	3.2	5.0	ND	ND	ND	ND	ND	ND
2,4-Dinitrotoluene	0.11	5.0	ND	ND	ND	ND	ND	ND
2-Methylphenol	NS	5.0	ND	ND	ND	ND	ND	ND
3&4-Methylphenol	NS	5.0	ND	ND	ND	ND	ND	ND
Hexachlorobenzene	0.022 to 1.0M	5.0	ND	ND	ND	ND	ND	ND
Hexachlorobutadiene	0.45	5.0	ND	ND	ND	ND	ND	ND
Hexachloroethane	0.88	5.0	ND	ND	ND	ND	ND	ND
Nitrobenzene	14	5.0	ND	ND	ND	ND	ND	ND
Pentachlorophenol	0.088 to 1.0M	5.0	ND	ND	ND	ND	ND	ND
Pyridine	NS	5.0	ND	ND	ND	ND	ND	ND

Notes:
NS - No Standard
M - Drinking Water Maximum Contaminant Level (MCL)
ug/L - micrograms per Liter
ND - Not Detected at the Laboratory Reporting Limit

TABLE 3
FARMERS SAND MINING OPERATIONS
SOIL ANALYTICAL RESULTS

RCRA 8 Metals-SPLP
Date Sampled: **2/25/2025**
Date Analyzed: **3/2/2025**
Method: **EPA 6020/SPLP**

Compound	Reg 41 Table 1 Standard (mg/L)	Result (mg/L)					
		Sample: N1-1	Sample: W-1	Sample: 1-1	Sample: 1-2	Sample: W-2	Sample: N1-2
Ag - Silver	0.05	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
Ba - Barium	2.0	0.251	0.29	0.239	0.163	0.336	0.265
Cd - Cadmium	0.005	<0.004	<0.004	<0.004	<0.004	<0.004	<0.004
Cr - Chromium	0.10	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
Pb - Lead	0.05	<0.010	0.023	<0.010	<0.010	<0.010	<0.010
Se - Selenium	0.05	<0.010	<0.010	<0.010	<0.010	<0.010	<0.010
As - Arsenic	0.01	<0.008	<0.008	<0.008	<0.008	<0.008	<0.008
Hg - Mercury	0.002	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

Notes:
mg/L - milligrams per Liter
< - Less than the Laboratory Reporting Limit

TABLE 4
FARMERS SAND MINING OPERATIONS
WATER ANALYTICAL RESULTS

Volatile Organics
Date Sampled: **2/25/2025**
Date Analyzed: **3/2/2025**
Method: **EPA 8260**

Compound	Reg 41 Table A Standard (ug/L)	Reg 41 Table A Standard (mg/L)	Result (mg/L) Sample: MLK
1,1,1,2-Tetrachloroethane	NS	NS	<0.005
1,1,1-Trichloroethane	14,000 or 200M	14 to 0.2M	<0.005
1,1,2,2-Tetrachloroethane	0.18	0.00018	<0.005
1,1,2-Trichloroethane	2.8 to 5M	0.0028 to 0.005M	<0.005
1,1-Dichloroethane	NS	NS	<0.005
1,1-Dichloroethene	7	0.007M	<0.005
1,1-Dichloropropene	NS	NS	<0.005
1,2,3-Trichlorobenzene	NS	NS	<0.005
1,2,4-Trichlorobenzene	70M	0.07M	<0.005
1,2,4-Trimethylbenzene	67	0.067	<0.005
1,2-Dibromoethane	0.018	0.00002	<0.001
1,2-Dichlorobenzene	600M	0.6M	<0.005
1,2-Dichloroethane	0.38 to 5M	0.00038 to 0.005M	<0.001
1,2-Dichloropropane	0.52 to 5M	0.00052 to 0.005M	<0.005
1,3,5-Trimethylbenzene	67	0.067	<0.005
1,3-Dichlorobenzene	94	0.094	<0.005
1,3-Dichloropropane	NS	NS	<0.005
1,4-Dichlorobenzene	NS	NS	<0.005
2,2-Dichloropropane	NS	NS	<0.005
2-Chlorotoluene	NS	NS	<0.005
4-Chlorotoluene	NS	NS	<0.005
4-Isopropyltoluene	NS	NS	<0.005
Benzene	5.0M	0.005M	<0.001
Bromobenzene	56	0.056	<0.005
Bromochloromethane	NS	NS	<0.005
Bromodichloromethane	0.56	0.00056	<0.005
Bromoform	4	0.004	<0.005
Bromomethane	NS	NS	<0.005
Carbon tetrachloride	0.5 to 5M	0.0005 to 0.005M	<0.005
Chlorobenzene	100M	0.1M	<0.005
Chloroethane	NS	NS	<0.005
Chloroform	3.5	0.0035	<0.003
Chloromethane	NS	NS	<0.005
cis-1,2-Dichloroethene	14 to 70M	0.014 to 0.07M	<0.005

Compound	Reg 41 Table A Standard (ug/L)	Reg 41 Table A Standard (mg/L)	Result (mg/L) Sample: MLK
cis-1,3-Dichloropropene	NS	NS	<0.005
Dibromochloromethane	14	0.01400	<0.005
Dibromomethane	NS	NS	<0.005
Ethylbenzene	700M	0.7M	<0.005
Hexachlorobutadiene	0.45	0.00045	<0.005
Isopropylbenzene	NS	NS	<0.005
Methylene chloride	5.6 or 5M	0.0056 to 0.005M	<0.005
MTBE	NS	NS	<0.005
Naphthalene	140	0.140	<0.005
n-Butylbenzene	NS	NS	<0.005
n-Propylbenzene	NS	NS	<0.005
sec-Butylbenzene	NS	NS	<0.005
Styrene	100M	0.1M	<0.005
tert-Butylbenzene	NS	NS	<0.005
Tetrachloroethene	17 or 5M	0.017 to 0.005M	<0.005
Toluene	560 to 1,000M	0.56 to 1M	<0.005
Total Xylenes	1,400 to 10,000M	1.4 to 10M	<0.015
trans-1,2-Dichloroethene	NS	NS	<0.005
trans-1,3-Dichloropropene	NS	NS	<0.005
Trichloroethene	5M	0.005M	<0.005
Trichlorofluoromethane	NS	NS	<0.005
Vinyl chloride	0.023 to 2M	0.000023 to 0.002M	<0.002

Notes:

NS - No Standard

M - Drinking Water Maximum Contaminant Level (MCL)

ug/L - micrograms per Liter

mg/L - milligrams per Liter

< - Less than the Laboratory Reporting Limit

TABLE 5
FARMERS SAND MINING OPERATIONS
WATER ANALYTICAL RESULTS

Semi-Volatile Organics
Date Sampled: **2/25/2025**
Date Analyzed: **3/3/2025**
Method: **EPA SW8270**

Compound	Reg 41 Table A Standards (ug/L)	Result	Report Limit (ug/L)
		Sample: MLK	
1,1´-Biphenyl	NS	ND	0.20
2,4,5-Trichlorophenol	700	ND	0.20
2,4,6-Trichlorophenol	3.2	ND	0.20
2,4-Dichlorophenol	21	ND	0.20
2,4-Dimethylphenol	140	ND	0.20
2,4-Dinitrophenol	14	ND	1.0
2,4-Dinitrotoluene	0.11	ND	0.20
2,6-Dinitrotoluene	NS	ND	0.20
2-Chloronaphthalene	NS	ND	0.20
2-Chlorophenol	35	ND	0.20
2-Methylnaphthalene	NS	ND	0.10
2-Methylphenol	NS	ND	0.20
2-Nitroaniline	NS	ND	0.20
2-Nitrophenol	NS	ND	0.20
3&4-Methylphenol	NS	ND	0.20
3,3´-Dichlorobenzidine	NS	ND	0.20
3-Nitroaniline	NS	ND	0.20
4,6-Dinitro-2-methylphenol	NS	ND	1.0
4-Bromophenyl phenyl ether	NS	ND	0.20
4-Chloro-3-methylphenol	210	ND	0.20
4-Chloroaniline	NS	ND	0.20
4-Chlorophenyl phenyl ether	NS	ND	0.20
4-Nitroaniline	NS	ND	0.20
4-Nitrophenol	56	ND	1.0
Acenaphthene	420	ND	0.10
Acenaphthylene	NS	ND	0.10
Acetophenone	NS	ND	0.20
Anthracene	2100	ND	0.10
Atrazine	3.0M	ND	0.20
Benz(a)anthracene	0.16	ND	0.10
Benzaldehyde	NS	ND	0.20
Benzo(a)pyrene	0.016	ND	0.10
Benzo(b)fluoranthene	0.16	ND	0.10

Compound	Reg 41 Table A Standards (ug/L)	Result	Report Limit (ug/L)
		Sample: MLK	
Benzo(g,h,i)perylene	NS	ND	0.10
Benzo(k)fluoranthene	1.6	ND	0.10
Bis(2-chloroethoxy)methane	NS	ND	0.20
Bis(2-chloroethyl)ether	NS	ND	0.20
Bis(2-chloroisopropyl)ether	NS	ND	0.20
Bis(2-ethylhexyl)phthalate	NS	ND	0.20
Butyl benzyl phthalate	1,400	ND	0.20
Caprolactam	NS	ND	1.0
Carbazole	NS	ND	0.20
Chrysene	16	ND	0.10
Dibenzofuran	NS	ND	0.10
Diethyl phthalate	5,600	ND	0.20
Dimethyl phthalate	NS	ND	0.20
Di-n-butyl phthalate	700	ND	0.20
Di-n-octyl phthalate	NS	ND	0.20
Fluoranthene	280	ND	0.10
Fluorene	280	ND	0.10
Hexachlorobenzene	0.022 to 1.0M	ND	0.20
Hexachlorobutadiene	0.45	ND	0.20
Hexachlorocyclopentadiene	42 to 50M	ND	0.20
Hexachloroethane	0.88	ND	0.20
Indeno(1,2,3-cd)pyrene	0.16	ND	0.10
Isophorone	140	ND	0.20
Naphthalene	140	ND	0.10
Nitrobenzene	14	ND	0.20
N-Nitrosodiphenylamine	7.1	ND	0.20
Pentachlorophenol	0.088 to 1.0M	ND	0.20
Phenanthrene	NS	ND	0.10
Phenol	2,100	ND	0.20
Pyrene	210	ND	0.10
Pyridine	NS	ND	1.00

Notes:

NS - No Standard

M - Drinking Water Maximum Contaminant Level (MCL)

ug/L - micrograms per Liter

ND - Not Detected at the Laboratory Reporting Limit

TABLE 6
FARMERS SAND MINING OPERATIONS
WATER ANALYTICAL RESULTS

RCRA 8 Metals-SPLP

Date Sampled: **2/25/2025**

Date Analyzed: **3/2/2025**

Method: **EPA 200.8/6020**

Compound	Reg 41 Table 1 Standard (mg/L)	Result (mg/L) Sample: MLK
Ag - Silver	0.05	<0.010
Ba - Barium	2.0	<0.050
Cd - Cadmium	0.005	<0.004
Cr - Chromium	0.10	<0.010
Pb - Lead	0.05	<0.010
Se - Selenium	0.05	<0.010
As - Arsenic	0.01	<0.008
Hg - Mercury	0.002	<0.001

Notes:

mg/L - milligrams per Liter

< - Less than the Laboratory Reporting Limit

EXHIBIT B
LAKE CHRISTINA AND NORTH SETTLING BASIN
RESULTS OF ANALYTICAL TESTING

TABLE 1
FARMERS SAND MINING OPERATIONS
LAKE CHRISTINA SOIL ANALYTICAL RESULTS

Volatile Organics-SPLP

Date Sampled: 3/13/2025 & 3/26/2025
Date Analyzed: 3/20/2025, 3/21/2025 & 4/2/2025
Method: EPA SW8260 - SPLP

Compound	Reg 41 Table A Standards (ug/L)	Result (ug/L) Sample: LC-1	Sample: LC-2	Sample: LC-3	Sample: LC-4	Sample: LCE-1
1,1,1-Trichloroethane	14,000 or 200M	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
1,1,2,2-Tetrachloroethane	0.18	< 0.50	< 0.50	< 0.50	< 2.5	< 0.50
1,1,2-Trichlor-1,2,2-trifluoroethane	NS	< 0.40	< 0.40	< 0.40	< 2.0	< 0.40
1,1,2-Trichloroethane	2.8 to 5M	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
1,1-Dichloroethane	NS	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
1,1-Dichloroethene	7	< 0.50	< 0.50	< 0.50	< 2.5	< 0.50
1,2,4-Trichlorobenzene	70M	< 0.50	< 0.50	< 0.50	< 2.5	< 0.50
1,2-Dibromo-3-chloropropane	0.2M	< 0.50	< 0.50	< 0.50	< 2.5	< 0.50
1,2-Dibromoethane	0.018	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
1,2-Dichlorobenzene	600M	< 0.40	< 0.40	< 0.40	< 2.0	< 0.40
1,2-Dichloroethane	0.38 to 5M	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
1,2-Dichloropropane	0.52 to 5M	< 0.40	< 0.40	< 0.40	< 2.0	< 0.40
1,3-Dichlorobenzene	94	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
1,4-Dichlorobenzene	NS	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
2-Butanone	NS	< 0.40	< 0.40	< 0.40	< 2.0	< 0.40
2-Hexanone	35	< 0.80	< 0.80	< 0.80	< 4.0	< 0.80
4-Methyl-2-pentanone	NS	< 0.60	< 0.60	< 0.60	< 3.0	< 0.60
Acetone	6300	< 1.0	< 1.0	< 1.0	< 5.0	< 1.0
Benzene	5.0M	< 0.20	< 0.20	< 0.20	< 1.0	< 0.20
Bromochloromethane	NS	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
Bromoform	4	< 0.40	< 0.40	< 0.40	< 2.0	< 0.40
Bromomethane	NS	< 1.0	< 1.0	< 1.0	< 5.0	< 1.0
Carbon disulfide	NS	< 0.70	< 0.70	< 0.70	< 3.5	< 0.70
Carbon tetrachloride	0.5 to 5M	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30

Compound	Reg 41 Table A Standards (ug/L)	Result (ug/L) Sample: LC-1	Sample: LC-2	Sample: LC-3	Sample: LC-4	Sample: LCE-1
Chlorobenzene	100M	< 0.20	< 0.20	< 0.20	< 1.0	< 0.20
Chloroethane	NS	< 0.50	< 0.50	< 0.50	< 2.5	< 0.50
Chloroform	3.5	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
Chloromethane	NS	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
cis-1,2-Dichloroethene	14 to 70M	< 0.40	< 0.40	< 0.40	< 2.0	< 0.40
cis-1,3-Dichloropropene	NS	< 0.40	< 0.40	< 0.40	< 2.0	< 0.40
Cyclohexane	NS	< 0.50	< 0.50	< 0.50	< 2.5	< 0.50
Dibromomethane	NS	< 0.40	< 0.40	< 0.40	< 2.0	< 0.40
Dichlorofluoromethane	NS	< 1.0	< 1.0	< 1.0	< 5.0	< 1.0
Ethylbenzene	700M	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
Isopropylbenzene	NS	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
m,p-Xylene	NS	< 0.60	< 0.60	< 0.60	< 3.0	< 0.60
Methyl acetate	NS	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
Methyl tert-butyl ether	NS	< 0.20	< 0.20	< 0.20	< 1.0	< 0.20
Methylcyclohexane	NS	< 0.40	< 0.40	< 0.40	< 2.0	< 0.40
Methylene chloride	5.6 or 5M	3.9	5.0	6.2	400	26
o-Xylene	NS	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
Styrene	100M	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
Tetrachloroethene	17 or 5M	< 0.40	< 0.40	< 0.40	< 2.0	< 0.40
Toluene	560 to 1,000M	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
trans-1,2-Dichloroethene	NS	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30
trans-1,3-Dichloropropene	NS	< 0.40	< 0.40	< 0.40	< 2.0	< 0.40
Trichloroethene	5M	< 0.20	< 0.20	< 0.20	< 1.0	< 0.20
Trichlorofluoromethane	NS	< 0.40	< 0.40	< 0.40	< 2.0	< 0.40
Vinyl acetate	NS	< 0.50	< 0.50	< 0.50	40	< 0.50
Xylenes, Total	1,400 to 10,000M	< 0.30	< 0.30	< 0.30	< 1.5	< 0.30

Notes:

NS - No Standard

M - Drinking Water Maximum Contaminant Level (MCL)

ug/L - micrograms per Liter

< - Less than the Method Detection Limit (MDL)

Sample results exceeds the respective Colorado Regulation 41 Standard

TABLE 2
FARMERS SAND MINING OPERATIONS
LAKE CHRISTINA SOIL ANALYTICAL RESULTS

Semi-Volatile Organics-SPLP

Date Sampled: 3/13/2025 & 3/26/2025
Date Analyzed: 3/19/2025 & 4/2/2025
Method: EPA SW8270 - SPLP

Compound	Reg 41 Table A Standards (ug/L)	Result (ug/L) Sample: LC-1	Sample: LC-2	Sample: LC-3	Sample: LC-4	Sample: LCE-1
1,1´-Biphenyl	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
2,4,5-Trichlorophenol	700	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
2,4,6-Trichlorophenol	3.2	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
2,4-Dichlorophenol	21	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
2,4-Dimethylphenol	140	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
2,4-Dinitrophenol	14	< 0.080	< 0.080	< 0.080	< 0.080	< 0.080
2,4-Dinitrotoluene	0.11	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
2,6-Dinitrotoluene	NS	< 0.060	< 0.060	< 0.060	< 0.060	< 0.060
2-Chloronaphthalene	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
2-Chlorophenol	35	< 0.060	< 0.060	< 0.060	< 0.060	< 0.060
2-Methylnaphthalene	NS	< 0.050	0.11 J	0.20 J	< 0.050	< 0.050
2-Methylphenol	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
2-Nitroaniline	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
2-Nitrophenol	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
3&4-Methylphenol	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
3,3´-Dichlorobenzidine	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
3-Nitroaniline	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
4,6-Dinitro-2-methylphenol	NS	< 0.080	< 0.080	< 0.080	< 0.080	< 0.080
4-Bromophenyl phenyl ether	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
4-Chloro-3-methylphenol	210	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
4-Chloroaniline	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
4-Chlorophenyl phenyl ether	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
4-Nitroaniline	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
4-Nitrophenol	56	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050

Compound	Reg 41 Table A Standards (ug/L)	Result (ug/L)				
		Sample: LC-1	Sample: LC-2	Sample: LC-3	Sample: LC-4	Sample: LCE-1
Acenaphthene	420	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Acenaphthylene	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Acetophenone	NS	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Atrazine	3.0M	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Benz(a)anthracene	0.16	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Benzaldehyde	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Benzo(a)pyrene	0.016	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Benzo(b)fluoranthene	0.16	< 0.060	< 0.060	< 0.060	< 0.060	< 0.060
Benzo(g,h,i)perylene	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Benzo(k)fluoranthene	1.6	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Bis(2-chloroethoxy)methane	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Bis(2-chloroethyl)ether	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Bis(2-chloroisopropyl)ether	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Bis(2-ethylhexyl)phthalate	NS	< 0.10	< 0.10	< 0.10	< 0.10	< 0.10
Butyl benzyl phthalate	1,400	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Caprolactam	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Carbazole	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Chrysene	16	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Di-n-butyl phthalate	700	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Di-n-octyl phthalate	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Dibenz(a,h)anthracene	0.016	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Dibenzofuran	NS	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Diethyl phthalate	5,600	< 0.050	0.05 J	< 0.050	0.069 J	< 0.050
Dimethyl phthalate	NS	0.88	0.89	0.80	0.86	1.9
Fluoranthene	280	< 0.050	< 0.050	0.055 J	< 0.050	< 0.050
Fluorene	280	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Hexachlorobenzene	0.022 to 1.0M	< 0.060	< 0.060	< 0.060	< 0.060	< 0.060
Hexachlorobutadiene	0.45	< 0.060	< 0.060	< 0.060	< 0.060	< 0.060
Hexachlorocyclopentadiene	42 to 50M	< 0.060	< 0.060	< 0.060	< 0.060	< 0.060
Hexachloroethane	0.88	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Indeno(1,2,3-cd)pyrene	0.16	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Isophorone	140	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
N-Nitrosodi-n-propylamine	0.005	< 0.080	< 0.080	< 0.080	< 0.080	< 0.080
N-Nitrosodiphenylamine	7.1	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050

Compound	Reg 41 Table A Standards (ug/L)	Result (ug/L)				
		Sample: LC-1	Sample: LC-2	Sample: LC-3	Sample: LC-4	Sample: LCE-1
Naphthalene	140	< 0.050	< 0.050	0.053 J	< 0.050	< 0.050
Nitrobenzene	14	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Pentachlorophenol	0.088 to 1.0M	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Phenanthrene	NS	< 0.050	< 0.050	0.17 J	< 0.050	< 0.050
Phenol	2,100	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050
Pyrene	210	< 0.050	< 0.050	< 0.050	< 0.050	< 0.050

Notes:

NS - No Standard

M - Drinking Water Maximum Contaminant Level (MCL)

ug/L - micrograms per Liter

< - Less than the Method Detection Limit (MDL)

J - Analyte detected below the Quantitation Limit

TABLE 3
FARMERS SAND MINING OPERATIONS
LAKE CHRISTINA SOIL ANALYTICAL RESULTS

RCRA 8 Metals-SPLP

Date Sampled: 3/13/2025 & 3/26/2025
Date Analyzed: 3/20/2025, 4/2/2025 & 4/3/2025
Method: EPA SW6020A - SPLP Mercury SW7470A - SPLP

Compound	Reg 41 Table 1 Standard (mg/L)	Result (mg/L) Sample: LC-1	Sample: LC-2	Sample: LC-3	Sample: LC-4	Sample: LCE-1
As - Arsenic	0.01	0.00192 J	0.00273 J	0.000783 J	0.00223 J	0.00512
Ba - Barium	2.0	0.0645	0.0545	0.0441	0.0671	0.0584
Cd - Cadmium	0.005	< 0.000200	< 0.000200	< 0.000200	< 0.000200	< 0.000200
Cr - Chromium	0.10	0.0252	0.0048 J	0.00939	0.0205	0.00143 J
Pb - Lead	0.05	0.00307 J	0.00198 J	0.000954 J	0.00236 J	0.00196 J
Se - Selenium	0.05	0.00251 J	0.00312 J	0.00237 J	0.00405 J	0.00770
Ag - Silver	0.05	< 0.000200	< 0.000200	< 0.000200	< 0.000200	< 0.000200
Hg - Mercury	0.002	< 0.0000300	< 0.0000300	< 0.0000300	< 0.0000300	< 0.0000300

Notes:
mg/L - milligrams per Liter
< - Less than the Method Detection Limit (MDL)
J - Analyte detected below the Quantitation Limit

TABLE 4
FARMERS SAND MINING OPERATIONS
LAKE CHRISTINA WATER ANALYTICAL RESULTS

Volatile Organics

Date Sampled: 3/13/2025
Date Analyzed: 3/18/2025
Method: EPA SW8260

Compound	Reg 41 Table A Standards (ug/L)	Result (ug/L) Sample: LCN-1	Sample: LCS-1
1,1,1-Trichloroethane	14,000 or 200M	< 0.20	< 0.20
1,1,2,2-Tetrachloroethane	0.18	< 0.50	< 0.50
1,1,2-Trichlor-1,2,2-trifluoroethane	NS	< 0.50	< 0.50
1,1,2-Trichloroethane	2.8 to 5M	< 0.30	< 0.30
1,1-Dichloroethane	NS	< 0.20	< 0.20
1,1-Dichloroethene	7	< 0.20	< 0.20
1,2,4-Trichlorobenzene	70M	< 0.50	< 0.50
1,2-Dibromo-3-chloropropane	0.2M	< 0.39	< 0.39
1,2-Dibromoethane	0.018	< 0.20	< 0.20
1,2-Dichlorobenzene	600M	< 0.50	< 0.50
1,2-Dichloroethane	0.38 to 5M	< 0.20	< 0.20
1,2-Dichloropropane	0.52 to 5M	< 0.50	< 0.50
1,3-Dichlorobenzene	94	< 0.40	< 0.40
1,4-Dichlorobenzene	NS	< 0.40	< 0.40
2-Butanone	NS	< 0.50	< 0.50
2-Hexanone	35	< 0.87	< 0.87
4-Methyl-2-pentanone	NS	< 0.70	< 0.70
Acetone	6300	< 0.92	< 0.92
Benzene	5.0M	< 0.20	< 0.20
Bromochloromethane	NS	< 0.20	< 0.20
Bromoform	4	< 0.40	< 0.40
Bromomethane	NS	< 0.40	< 0.40
Carbon disulfide	NS	< 0.60	< 0.60
Carbon tetrachloride	0.5 to 5M	< 0.50	< 0.50
Chlorobenzene	100M	< 0.30	< 0.30
Chloroethane	NS	< 0.30	< 0.30
Chloroform	3.5	< 0.20	< 0.20
Chloromethane	NS	< 0.20	< 0.20
cis-1,2-Dichloroethene	14 to 70M	< 0.20	< 0.20
cis-1,3-Dichloropropene	NS	< 0.10	< 0.10
Cyclohexane	NS	< 0.30	< 0.30
Dibromomethane	NS	< 0.30	< 0.30
Dichlorofluoromethane	NS	< 0.30	< 0.30

Compound	Reg 41 Table A Standards (ug/L)	Result (ug/L) Sample: LCN-1	Sample: LCS-1
Ethylbenzene	700M	< 0.30	< 0.30
Isopropylbenzene	NS	< 0.30	< 0.30
m,p-Xylene	NS	< 0.50	< 0.50
Methyl acetate	NS	< 0.46	< 0.46
Methyl tert-butyl ether	NS	< 0.20	< 0.20
Methylcyclohexane	NS	< 0.30	< 0.30
Methylene chloride	5.6 or 5M	< 0.54	< 0.54
o-Xylene	NS	< 0.30	< 0.30
Styrene	100M	< 0.30	< 0.30
Tetrachloroethene	17 or 5M	< 0.30	< 0.30
Toluene	560 to 1,000M	< 0.20	< 0.20
trans-1,2-Dichloroethene	NS	< 0.20	< 0.20
trans-1,3-Dichloropropene	NS	< 0.20	< 0.20
Trichloroethene	5M	< 0.30	< 0.30
Trichlorofluoromethane	NS	< 0.30	< 0.30
Vinyl acetate	NS	< 0.20	< 0.20
Xylenes, Total	1,400 to 10,000M	< 0.30	< 0.30

Notes:

NS - No Standard

M - Drinking Water Maximum Contaminant Level (MCL)

ug/L - micrograms per Liter

< - Less than the Method Detection Limit (MDL)

TABLE 5
FARMERS SAND MINING OPERATIONS
LAKE CHRISTINA WATER ANALYTICAL RESULTS

Semi-Volatile Organics

Date Sampled: 3/13/2025
Date Analyzed: 3/19/2025
Method: EPA SW8270

Compound	Reg 41 Table A Standards (ug/L)	Result (ug/L)	
		Sample: LCN-1	Sample: LCS-1
1,1´-Biphenyl	NS	< 0.024	< 0.024
2,4,5-Trichlorophenol	700	< 0.057	< 0.057
2,4,6-Trichlorophenol	3.2	< 0.048	< 0.048
2,4-Dichlorophenol	21	< 0.043	< 0.043
2,4-Dimethylphenol	140	< 0.040	< 0.040
2,4-Dinitrophenol	14	< 0.10	< 0.10
2,4-Dinitrotoluene	0.11	< 0.058	< 0.058
2,6-Dinitrotoluene	NS	< 0.042	< 0.042
2-Chloronaphthalene	NS	< 0.021	< 0.021
2-Chlorophenol	35	< 0.036	< 0.036
2-Methylnaphthalene	NS	< 0.019	< 0.019
2-Methylphenol	NS	< 0.045	< 0.045
2-Nitroaniline	NS	< 0.041	< 0.041
2-Nitrophenol	NS	< 0.034	< 0.034
3&4-Methylphenol	NS	< 0.036	< 0.036
3,3´-Dichlorobenzidine	NS	< 0.044	< 0.044
3-Nitroaniline	NS	< 0.049	< 0.049
4,6-Dinitro-2-methylphenol	NS	< 0.020	< 0.020
4-Bromophenyl phenyl ether	NS	< 0.051	< 0.051
4-Chloro-3-methylphenol	210	< 0.032	< 0.032
4-Chloroaniline	NS	< 0.039	< 0.039
4-Chlorophenyl phenyl ether	NS	< 0.044	< 0.044
4-Nitroaniline	NS	< 0.035	< 0.035
4-Nitrophenol	56	< 0.047	< 0.047
Acenaphthene	420	< 0.027	< 0.027
Acenaphthylene	NS	< 0.015	< 0.015
Acetophenone	NS	< 0.024	< 0.024
Anthracene	2100	< 0.014	< 0.014
Atrazine	3.0M	< 0.033	< 0.033
Benz(a)anthracene	0.16	< 0.033	< 0.033
Benzaldehyde	NS	< 0.12	< 0.12
Benzo(a)pyrene	0.016	< 0.020	< 0.020
Benzo(b)fluoranthene	0.16	< 0.023	< 0.023

Compound	Reg 41 Table A Standards (ug/L)	Result (ug/L) Sample: LCN-1	Sample: LCS-1
Benzo(g,h,i)perylene	NS	< 0.014	< 0.014
Benzo(k)fluoranthene	1.6	< 0.019	< 0.019
Bis(2-chloroethoxy)methane	NS	< 0.030	< 0.030
Bis(2-chloroethyl)ether	NS	< 0.026	< 0.026
Bis(2-chloroisopropyl)ether	NS	< 0.070	< 0.070
Bis(2-ethylhexyl)phthalate	NS	< 0.037	< 0.037
Butyl benzyl phthalate	1,400	< 0.019	< 0.019
Caprolactam	NS	< 0.045	< 0.045
Carbazole	NS	< 0.025	< 0.025
Chrysene	16	< 0.021	< 0.021
Dibenz(a,h)anthracene	0.016	< 0.024	< 0.024
Dibenzofuran	NS	< 0.020	< 0.020
Diethyl phthalate	5,600	< 0.030	< 0.030
Dimethyl phthalate	NS	< 0.041	< 0.041
Di-n-butyl phthalate	700	< 0.020	< 0.020
Di-n-octyl phthalate	NS	< 0.020	< 0.020
Fluoranthene	280	< 0.010	< 0.010
Fluorene	280	< 0.030	< 0.030
Hexachlorobenzene	0.022 to 1.0M	< 0.044	< 0.044
Hexachlorobutadiene	0.45	< 0.030	< 0.030
Hexachlorocyclopentadiene	42 to 50M	< 0.030	< 0.030
Hexachloroethane	0.88	< 0.059	< 0.059
Indeno(1,2,3-cd)pyrene	0.16	< 0.022	< 0.022
Isophorone	140	< 0.025	< 0.025
Naphthalene	140	< 0.020	< 0.020
Nitrobenzene	14	< 0.024	< 0.024
N-Nitrosodi-n-propylamine	0.005	< 0.032	< 0.032
N-Nitrosodiphenylamine	7.1	< 0.025	< 0.025
Pentachlorophenol	0.088 to 1.0M	< 0.079	< 0.079
Phenanthrene	NS	< 0.021	< 0.021
Phenol	2,100	< 0.035	< 0.035
Pyrene	210	< 0.019	< 0.019
Pyridine	NS	< 0.030	< 0.030

Notes:

NS - No Standard

M - Drinking Water Maximum Contaminant Level (MCL)

ug/L - micrograms per Liter

< - Less than the Method Detection Limit (MDL)

TABLE 6
FARMERS SAND MINING OPERATIONS
LAKE CHRISTINA WATER ANALYTICAL RESULTS

RCRA 8 Metals-SPLP

Date Sampled: 3/13/2025
Date Analyzed: 3/20/2025
Method: EPA SW6020A Mercury SW7470A

Compound	Reg 41 Table 1 Standard (mg/L)	Result (mg/L) Sample: LCN-1	Sample: LCS-1
As - Arsenic	0.01	0.00154 J	0.00267
Ba - Barium	2.0	0.0953	0.0754
Cd - Cadmium	0.005	< 0.000200	< 0.000200
Cr - Chromium	0.10	0.00132 J	0.00486
Pb - Lead	0.05	< 0.000600	< 0.000600
Se - Selenium	0.05	0.00178 J	0.00177 J
Ag - Silver	0.05	< 0.000200	< 0.000200
Hg - Mercury	0.002	< 0.0000300	< 0.0000300

Notes:
mg/L - milligrams per Liter
< - Less than the Method Detection Limit (MDL)
J - Analyte detected below the Quantitation Limit