ASPHALT SPECIALTIES CO.
345 W. 62nd Ave. • Denver, CO 80216 • (303) 289-8555 • Fax: (303) 289-7707

May 2, 2025

Ms. Nikie Gagnon
Environmental Protection Specialist
Colorado Division of Reclamation, Mining, and Safety

Re: April 2025 Confirmation Sample Result and Trend Discussion for Manganese in Chavers Mining Resource (DRMS Permit No. M-2015-030) Down-Gradient/POC Monitoring Well MW-4

Ms. Gagnon:

As requested in the DRMS letter dated April 14, 2025, ASCI is submitting the April 2025 groundwater confirmation sample result for Manganese in MW-4 (Down-gradient/POC Well) along with a graph of historic Manganese concentrations in groundwater reported in MW-4 and up-gradient wells MW-2 & MW-3. Below is a discussion of the results and trends identified.

MW-4 (Down-gradient/POC Well) April 2025 Confirmation Sample Result

The result for Manganese reported in the April 2025 groundwater confirmation sample collected from MW-4 indicates the concentration is below the groundwater quality standard of 0.397 mg/L. The Manganese result reported is shown below.

- April 2025 Confirmation Sample Result for Manganese in MW-4 = **0.0576 mg/L**

A copy of the laboratory report is presented in Attachment 1.

Discussion of Historic Manganese Concentrations and Trends in MW-4 and Up-Gradient Wells MW-2 & MW-3

The exceedance reported for Manganese in MW-4 from the 1st Quarter 2025 sampling event in March (i.e., 0.4032 mg/L) only slightly exceeded the groundwater quality standard of 0.397 mg/L by 0.0062 mg/L. While technically an exceedance, ASCI considers the result to be within the general range of background concentrations previously reported at the Site. When evaluating historic Manganese results and trends in MW-4, it is also relevant to review the historic concentrations reported in up-gradient wells MW-2 and MW-3 to demonstrate the sporadic nature of elevated Manganese concentrations that can occur at the Site. A graph of historic Manganese concentrations reported for MW-2, MW-3, and MW-4 is presented in Attachment 2. As shown, it is not uncommon for elevated Manganese concentrations to temporarily occur, especially given the multiple industrial and agricultural land uses that are present up-gradient of the Chavers mine. As these off-site land uses would be the source of the elevated Manganese concentrations in up-

gradient wells MW-2 and MW-3, they could also potentially be the source of Manganese impacts in MW-4 given the similar concentration levels.

Based on the trend data presented in the graph and decreased Manganese concentration reported for the April 2025 confirmation sample, the slight exceedance for Manganese in MW-4 above the groundwater quality standard during the 1st Quarter 2025 sampling event in March is considered to have been temporary and within the normal range of fluctuations that have previously been documented at the Site.

Future Monitoring Activities

ASCI will continue to monitor groundwater quality conditions at the Site by conducting quarterly sampling events at the Site. The next sampling event (2nd Quarter 2025) is scheduled for June.

Please contact me at (303) 289-8555 or GregG@asphaltspecialties.com if you have any questions.

Sincerely,

Greg Geras
Land Resource Manager
Asphalt Specialties Co., Inc.

Attachment 1 – April 2025 Laboratory Sample Results

Attachment 2 – Graph of Manganese Concentrations Reported in Groundwater from Chavers Monitoring Wells MW-2 (Up-gradient), MW-3 (Up-gradient), and MW-4 (Down-gradient)

Colorado Analytical LABORATORIES, INC.

Analytical Results

TASK NO: 250416114

Report To: Greg Geras
Company: Asphalt Specialties
345 W. 62nd Avenue
Denver CO 80216

Bill To: Accounts Payable
Company: Asphalt Specialties
345 W. 62nd Avenue
Denver CO 80216

Task No.: 250416114
Client PO: 4050.980.17000.117
Client Project: Chavers GW Wells

Date Received: 4/16/25
Date Reported: 4/22/25
Matrix: Water

Customer Sample ID MW-4
Sample Date/Time: 4/16/25 10:45 AM
Lab Number: 250416114-01

Test	Result / Units	Method	RL	MDL	Date Analyzed	QC Batch ID	Analyzed By
Dissolved							
Manganese	**0.0576 mg/L**	EPA 200.8	0.0008	0.00001	4/18/25	QC81172	AMJ

Abbreviations/ References:

RL = Reporting Limit = Minimum Level
MDL = Method Detection Limit
mg/L = Milligrams Per Liter or PPM
ug/L = Micrograms Per Liter or PPB
mpn/100 mls = Most Probable Number Index/ 100 mls
Date Analyzed = Date Test Completed

(d) RPD acceptable due to low duplicate and sample concentrations.
(s) The accuracy of the spike recovery value is reduced due to the analyte concentration in the sample being disproportionate to the spike level. The laboratory control sample recovery was acceptable

ND = Not Detected at Reporting Limit.

Colorado Analytical LABORATORIES, INC.

Analytical QC Summary

TASK NO: 250416114

Report To: Greg Geras
Company: Asphalt Specialties

Receive Date: 4/16/25
Project Name: Chavers GW Wells

Test	QC Batch ID	QC Type	Result	Method	Prep Date
Manganese	QC81172	Method Blank	ND	EPA 200.8	4/16/25

Test	QC Batch ID	QC Type	Limits	% Rec	RPD	Method
Manganese	QC81172	LCS	90 - 110	91.3	-	EPA 200.8
		MS -250416006-01	70 - 130	106.6	-	
		MSD -250416006-01	0 - 10	-	0.0	

All analyses were performed in accordance with approved methods under the latest revision to 40 CFR Part 136 unless otherwise identified. Based on my inquiry of the person or persons directly responsible for analyzing samples and generating the report (s), the analyses, report, and information submitted are, to the best of my knowledge and belief, true, accurate, and complete.

DATA APPROVED FOR RELEASE BY

Abbreviations/ References:

RL = Reporting Limit = Minimum Level
MDL = Method Detection Limit
mg/L = Milligrams Per Liter or PPM
ug/L = Micrograms Per Liter or PPB
mpn/100 mls = Most Probable Number Index/ 100 mls
Date Analyzed = Date Test Completed

(d) RPD acceptable due to low duplicate and sample concentrations.
(s) The accuracy of the spike recovery value is reduced due to the analyte concentration in the sample being disproportionate to the spike level. The laboratory control sample recovery was acceptable

ND = Not Detected at Reporting Limit.

Chain of Custody Form

Colorado Analytical LABORATORIES, INC.

Commerce City Lab
10411 Heinz Way
Commerce City CO 80640

Lakewood Service Center
610 Garrison St, Unit E
Lakewood CO 80215

Phone: 303-659-2313

www.coloradolab.com

Report To Information	**Bill To Information** (If different from report to)	**Project Name / Number**
Company Name: Asphalt Specialties Co., Inc.	**Company Name:** _____	Chavers GW Wells
Contact Name: Greg Geras	**Contact Name:** _____	_____
Address: 345 W. 62nd Ave.	**Address:** _____	**Task Number** (Lab Use Only)
City Denver **State** CO **Zip** 80216	**City** **State** **Zip**	CAL Task 250416114 JML
Phone: 303-289-8555	**Phone:**	
Email: gregg@asphaltspecialties.com	**Email:**	
Sample Collector: Greg Geras		
Sample Collector Phone: 303-495-9888	**PO No.:4050.980.17000.117**	

Sample Matrix (Select One Only)

- **Water** ☒ **(CWA / NPDES)** Includes wastewater, non-potable samples not intended for drinking water use.
- **Drinking Water** ☐ **(SDWA)** Includes finished drinking water, raw (untreated) water samples intended for human consumption.
- **Solid (Sludge)** ☐ **(503 Regs / RCRA/ SW-846)** Solid and Semi Solid Samples

Tests Requested

Date	Time	Sample ID	No. of Containers	Grab	or (Check One Only) Composite	Manganese(Dissolved)
4/16/25	1045	MW-4	1	☒	☐	☒
				☐	☐	☐
				☐	☐	☐
				☐	☐	☐
				☐	☐	☐
				☐	☐	☐
				☐	☐	☐
				☐	☐	☐
				☐	☐	☐
				☐	☐	☐

Instructions: *Lab to filter samples (0.45 micron)*

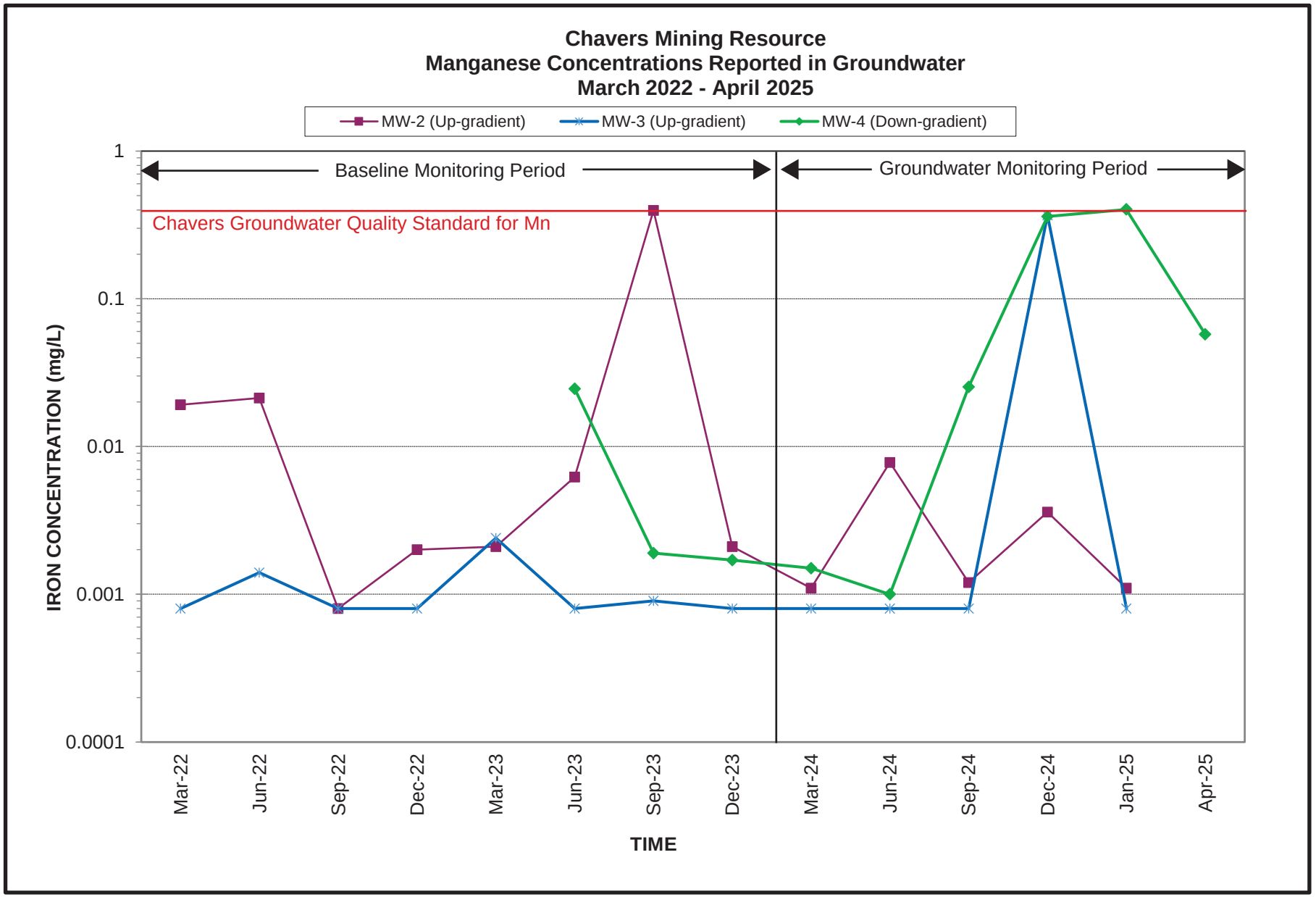
C/S Info:

Deliver Via: HAND   C/S Charge ☐

Seals Present Yes ☐ No ☐

Temp. 20 C/Ice N   Sample Pres. Yes ☐ No ☒

Relinquished By:	Date/Time:	Received By:	Date/Time:	Relinquished By:	Date/Time:	Received By:	Date/Time:
[signature]	4/16/25/1128					[signature]	4/16/25


Chavers Mining Resource
Manganese Concentrations Reported in Groundwater
March 2022 - April 2025
MW-2 (Up-gradient)
MW-3 (Up-gradient)
MW-4 (Down-gradient)
Baseline Monitoring Period
Groundwater Monitoring Period
Chavers Groundwater Quality Standard for Mn
IRON CONCENTRATION (mg/L)
1
0.1
0.01
0.001
0.0001
Mar-22
Jun-22
Sep-22
Dec-22
Mar-23
Jun-23
Sep-23
Dec-23
Mar-24
Jun-24
Sep-24
Dec-24
Jan-25
Apr-25
TIME