MINED LAND RECLAMATION BOARD BOARD ORDER FILE NO. M-1977-410, MV-2021-017 QUARTERLY REPORT SECOND QUARTER 2025 REV-7-July-2025 GRAND ISLAND RESOURCES LLC CROSS AND CARIBOU MINES NEDERLAND, COLORADO

PREPARED BY: GRAND ISLAND RESOURCES LLC CROSS AND CARIBOU MINES 4415 CARIBOU ROAD NEDERLAND, CO 80466

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1. CERTIFICATION

Name & Location of Project:

Grand Island Resources, LLC – Cross and Caribou Mines 4415 Caribou Road, Nederland, CO 80466

Operator:

Name: Richard Mittasch, Vice President – Grand Island Resources Address: 4415 Caribou Road, Nederland, CO 80466

I hereby certify that the information contained in this Second-Quarter 2025 report is true and correct to the best of my knowledge and belief.

Signed:

Richard Mittasch, Vice President Grand Island Resources *Date:* 7 July 2025

2. INTRODUCTION

The Colorado Mined Land Reclamation Board ("Board") on 18 February 2022 issued Findings of Fact, Conclusions of Law and Order in Notice of Violation **MV-2021-017**, imposing a cease-and-desist on underground activities and four corrective actions. The Order remains the controlling framework for quarterly reporting. The Company has submitted compliant quarterly reports since Q1-2022, most recently the **First-Quarter 2025** report.

This report was first transmitted to DRMS on 3 July 2025. At DRMS's request (e-mail from Patrick Lennberg dated 7 July 2025), it has been revised to discuss the Colorado Department of Public Health and Environment ("CDPHE") Operator-Certification Notice of Violation OW-250625-1 issued 25 June 2025. Section 4.4 below provides the requested background, corrective-action narrative, and forward schedule.

3. MLRB ORDER

3.1 Cease & Desist – Underground Activities

Board Order: Underground work is prohibited except for Division-approved activities required to protect water quality, public health and safety, or fulfil the Order.

Operator Actions: Table 3.1.2-1 updates the status of each approved activity as of **30 June 2025**. Activities and original approval dates mirror those set out in previous quarters .

Priority	Location	Activity	Final DRMS Approval	Progress % (Q1-25)	Progress % (Q2-25)
1	Cross	Snowshed rehabilitation	incidental	10 %	20 %
2	Cross	Apache / Potosi sump at "G" Station	22-Dec-21	55 %	65 %
3	Cross	Winze hoist & sump rehabilitation	18-Feb-22	20 %	35 %
3	Cross	Sub-level sediment sumps rehab	18-Feb-22	5 %	15 %
4	Site-wide	Hydro-geologic study (pending)	_	0 %	0 %

All Priority-1 infrastructure (discharge lines, utilities, ventilation, freeze-protection) remains fully operational (100 %).

3.2 Corrective Actions

3.2.1 Water-Treatment Technical Revision TR-10

Quarterly sampling continues under **TR-10** and **TR-15**. Compliance samples for Q2-2025 were taken **13 March 2025** and **17 June 2025**; laboratory certificates were forwarded to DRMS on 24 June 2025. No exceedances of permit limits were reported.

3.2.2 Financial Warranty

The site remains fully bonded at US \$546,751; no adjustments were requested or required during the quarter .

3.2.3 Quarterly Reporting

This report fulfils the continuing quarterly-report requirement established in the Board Order and subsequent stipulations.

3.2.4 112(d) Designated Mining Operation (DMO)

The formal 112(d) application submitted 12 December 2024 is under DRMS review. No additional information requests were received during Q2-2025.

3.2.4 112(d) Designated Mining Operation (DMO)

The formal § 112(d) application submitted **12 December 2024** remains under Division review. **On 9 May 2025 the Division issued its Preliminary Adequacy Review** covering the submittal. The review identified four subject areas requiring supplemental detail (geochemistry, hydrology, mine-sequencing narrative, and financial warranty calculation). Grand Island Resources is compiling the requested information and will transmit a consolidated response no later than **September 30, 2025.** No additional adequacy comments were received after 9 May, and the project schedule remains on track.

4. CDPHE – Water Quality Control Division

4.1 Discharge Compliance Summary

Mr John Rinko, Jr. continues to manage the water-treatment plant. All parameters for Outfall 001 remained within permit CO-0032751 limits throughout April–June 2025. As in previous quarters, potentially dissolved Ag and Cd were reported "B" (below reporting limit) with MDLs below permit limits. Final laboratory reports for the second June sample become available mid-July and will appear in the Q3-2025 report.

4.2 Activities Completed as of 30 June 2025

- DMRs submitted for January 2022 June 2025 without a single effluent violation.
- Continuous electronic logging of groundwater levels (Caribou, Cross & Compliance wells) and discharge flow-rates.
- Completion of annual maintenance dredging of Pond 2 sludge (9–13 June 2025); manifests and TCLP analyses will be provided upon disposal facility acceptance.
- 112(d) application DRMS conducted completeness review site visit (28 May 2025); no deficiencies noted.

4.3 Third-Quarter 2025 Planned Activities

- 1. Complete concrete lining and outfitting of Cross Drift (target: 90 % by 30 Sept 2025).
- 2. Install final timber sets in Snowshed and re-open portal access road.
- 3. Excavate catchment berms at Cross fractured zones (Priority 3.1.1 commence August 2025).
- 4. Continue Winze hoist refurbishment (motor rebuild scheduled 15 Aug 2025).
- 5. Submit Q2-2025 DMRs and initiate Q3 sampling (week of 15 September 2025).

4.4 Notice of Violation OW-250625-1 – Operator Certification

4.4.1 Background

On 25 June 2025 the CDPHE Water Quality Control Division ("WQCD") issued Operator-Certification Notice of Violation OW-250625-1 ("NOV") to Grand Island Resources LLC ("GIR") for Permit CO-0032751. The NOV alleged that, contrary to § 25-9-110(2)(a), C.R.S., and 5 CCR 1003-2 § 100.10.1(a), Mr. John Rinko served as the facility's Operator-in-Responsible-Charge (ORC) through the end of Q2 2025. He repeatedly advised management that he was awaiting CDPHE to schedule his Industrial Wastewater Class C certification examination, and we were confident he possessed the requisite experience to obtain that credential. However, once the CDPHE issued the Notice of Violation on 25 June 2025, the Company determined that further delay was not acceptable and therefore retained a fully certified Class A operator, Mr. David Lewis, who assumed the ORC role effective 1 July 2025. The facility had been cited twice previously via compliance advisories (5 July 2024 and 29 November 2024).

4.4.2 Corrective Action Completed

Item	Action	Completion Date	Evidence
1	Appointed Mr David ("Dave") Lewis – Industrial Wastewater Class A Operator (Certificate No. CWP-IA-01260-0515, exp 31-Dec-2027) as ORC	1 Jul 2025	Section III-1 of GIR's formal answer to NOV
2	Filed CDPHE Change-of-Contact / ORC Designation form listing Mr Lewis	2 Jul 2025	Attachment 1 to answer letter
3	Implemented internal compliance calendar tracking operator credentials & expiry dates	2 Jul 2025	Section III-3
4	Authorized Mr Lewis to enroll back-up operators for redundancy	2 Jul 2025	Section III-3

As of 2 July 2025, all NOV-specified corrective actions have been fully implemented.

4.4.3 Remaining Requirements & Abatement Schedule

Although the root violation is cured, GIR has established the following schedule to ensure sustained compliance:

Task	Deliverable	Responsible Person	Target Date
А	Submit copy of Class A certificate & receipt of CDPHE acceptance to DRMS	ORC (D. Lewis)	15 Jul 2025
В	Enroll two back-up operators in CDPHE Industrial WW Class C course and record in compliance calendar	VP Operations	31 Aug 2025
С	Quarterly internal audit of operator credentials (add line item to Q3-2025 report)	Compliance Manager	15 Oct 2025
D	Review and, if necessary, renew ORC certification six months prior to expiry	ORC / HR	30 Jun 2027

4.4.4 Status Summary

- Current compliance status: IN COMPLIANCE Certified Class A ORC on record.
- **No impact** to effluent limits or Discharge Monitoring Reports (DMRs) resulted from the NOV.
- DRMS and CDPHE will be kept informed via the schedule above; any deviation will be reported within ten (10) business days.

5. CLOSING

Grand Island Resources appreciates DRMS's prompt feedback and confirms that all items in NOV OW-250625-1 have been abated. We remain committed to proactive communication to prevent future compliance lapses.

Grand Island Resources, its directors and personnel remain committed to full compliance with the Board Order and to continuous improvement of site environmental performance. We appreciate the Board's guidance and DRMS/CDPHE cooperation and will continue to invest the resources necessary to bring the Cross Gold Mine into long-term compliance and sustainable operation.

Respectfully submitted,

Richard Mittasch, Vice President Grand Island Resources 7 July 2025

Attachments: •CO0032751_DMRcov_2025_05

•CO0032751_DMRcov_2025_04

•CO0032751_DMRcov_2025_03

•Answer to Operator-Certification NOV OW-250625-1 (2 July 2025) – full letter and certification statement.

•Executed Change-of-Contact / ORC Designation Form (Permit CO-0032751).

RINKO, LLC

Rinko, LLC 12081 W. Alameda Pkwy. #254 Lakewood, Colorado 80228 E-Mail: johnrinko@yahoo.com

April 22, 2025

Permits and Enforcement Section Water Quality Control Division Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, CO 80246

Subject: Cross and Caribou Mines Discharge Permit #CO-0032751 March 2025 Discharge Monitoring Reports

To whom it may concern:

The March 2025 Discharge Monitoring Reports (DMRs) were submitted on April 22, 2025 for the above referenced site. In March and the first quarter of 2025 there were no exceedances of the permit limits at Outfall 001.

Potentially dissolved silver and potentially dissolved cadmium were reported as below detection limit (B) for the 30-day averages as the permit limit is lower than the Reporting Limit (RL) from the analytical laboratory used, Eurofins Denver. The laboratory's Method Detection Limits (MDLs) for these two parameters were less than the RLs and the Practical Quantitation Limits (PQLs). The analytical results were non detect at the MDL levels.

The two quarterly DMRs for low level mercury (LLHg) and chronic whole effluent toxicity (WET) testing were submitted for the first quarter 2025. There was no statistically significant toxicity detected in the discharge water and the effluent passed WET testing requirements. LLHg was detected at 1.9 nanograms per Liter (ng/L) or 0.0019 ug/L, slightly above the method detection limit of 0.5 ng/L. This value is consistent with past results.

Please feel free to contact me at (303) 601-9230 or at johnrinko@yahoo.com with any questions, comments, or additional requests regarding this DMR submittal.

Sincerely,

() in A

John Rinko, Jr. Principal

RINKO, LLC

Rinko, LLC 12081 W. Alameda Pkwy. #254 Lakewood, Colorado 80228 E-Mail: johnrinko@yahoo.com

May 28, 2025

Permits and Enforcement Section Water Quality Control Division Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, CO 80246

Subject: Cross and Caribou Mines Discharge Permit #CO-0032751 April 2025 Discharge Monitoring Report

To whom it may concern:

The April 2025 Discharge Monitoring Report (DMR) was submitted on May 28, 2025 for the above referenced site. In April 2025 there were no exceedances of the permit limits at Outfall 001.

Potentially dissolved silver and potentially dissolved cadmium were reported as below detection limit (B) for the 30-day averages as the permit limit is lower than the Reporting Limit (RL) from the analytical laboratory used, Eurofins Denver. The laboratory's Method Detection Limits (MDLs) for these two parameters were less than the RLs and the Practical Quantitation Limits (PQLs). The analytical results were non detect at the MDL levels.

Please feel free to contact me at (303) 601-9230 or at johnrinko@yahoo.com with any questions, comments, or additional requests regarding this DMR submittal.

Sincerely,

John Rinko, Jr. Principal

RINKO, LLC

Rinko, LLC 12081 W. Alameda Pkwy. #254 Lakewood, Colorado 80228 E-Mail: johnrinko@yahoo.com

June 28, 2025

Permits and Enforcement Section Water Quality Control Division Colorado Department of Public Health and Environment 4300 Cherry Creek Drive South Denver, CO 80246

Subject: Cross and Caribou Mines Discharge Permit #CO-0032751 May 2025 Discharge Monitoring Report

To whom it may concern:

The May 2025 Discharge Monitoring Report (DMR) was submitted on June 28, 2025 for the above referenced site. In May 2025 there were no exceedances of the permit limits at Outfall 001.

Potentially dissolved silver was reported as below detection limit (B) for the 30-day average as the permit limit is lower than the Reporting Limit (RL) from the analytical laboratory used, Eurofins Denver. The laboratory's Method Detection Limits (MDLs) for this parameter was less than the RLs and the Practical Quantitation Limits (PQLs). The analytical results were non detect at the MDL levels.

Please feel free to contact me at (303) 601-9230 or at johnrinko@yahoo.com with any questions, comments, or additional requests regarding this DMR submittal.

Sincerely,

John Rinko, Jr. Principal



Subject: Answer to Operator Certification Notice of Violation OW-250625-1 (Permit CO0032751)

To:

Colorado Department of Public Health and Environment

Water Quality Control Division - Clean Water Enforcement Unit

Attention: Mr. Jacob Dyste, Enforcement Specialist

Mail Code: WQCD-CWE-B2 4300 Cherry Creek Drive South, Denver, CO 80246-1530 E-mail (electronic copy): jacob.dyste@state.co.us E-mail (Change-of-Contact form): cdphe.wgrecordscenter@state.co.us

I. Introduction

Pursuant to § 25-9-110(3), C.R.S., and **Paragraph 19** of Operator Certification Notice of Violation **OW-250625-1** ("ORCNOV"), Grand Island Resources LLC ("GIR") hereby submits its **answer** to each allegation contained in the ORCNOV and provides evidence that all corrective actions have been completed.

II. Answer to Findings and Alleged Violation

ORCNOV ¶	Division's Finding	GIR's Answer
1 – 5	Corporate status, facility description, permit coverage and classification	Admit.
6	Statutory requirement to operate under a properly certified ORC	Admit.
7	Requirement to notify the Division of ORC information within 30 days	Admit.
8	Facility classified as Industrial Wastewater Class C	Admit.
9 – 10	22 Mar 2024 change-of-contact form designated Mr. John Rinko (Class D) as ORC	Admit.
11	Compliance advisories of 5 Jul 2024 and 29 Nov 2024	Admit.

ORCNOV ¶	Division's Finding	GIR's Answer
12	No subsequent demonstration of a properly certified ORC as of 25 Jun 2025	Admit that no documentation had been provided prior to 25 Jun 2025; see Section III for corrective action completed 1 Jul 2025.
13	Resulting violation of § 25-9-110(2)(a), C.R.S., and 5 CCR 1003-2 § 100.10.1(a)	Admit the violation existed; violation has been fully corrected as of 1 Jul 2025.

III. Corrective Actions Completed

- 1. Appointment of a Class A Operator in Responsible Charge (ORC).
 - Name: Mr. David ("Dave") Lewis
 - Certification: Industrial Wastewater Class A (Certificate No. CWP-IA-01260-0515. Expires 12-31-2027) – two levels higher than the required Class C.
 - Effective Date: 1 July 2025.

2. Change-of-Contact Submission.

- A fully executed Change of Contact / ORC Designation form for Permit CO0032751 naming Mr. Lewis as ORC was e-mailed today to <u>cdphe.wqrecordscenter@state.co.us</u> as instructed in your 25 June 2025 e-mail.
- A copy of the form is attached for convenience.

3. Future Compliance Assurance.

- GIR has implemented an internal compliance calendar that tracks license expiration dates and classification requirements to prevent recurrence.
- Mr. Lewis has been authorized to enroll additional back-up operators in the State certification program to provide redundancy.

IV. Hearing Request

GIR **does not request a hearing** pursuant to § 25-9-110(4), C.R.S., at this time, as the violation has been remedied and all corrective actions are complete.

V. Certification Statement

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

VI. Conclusion

With the submission of the Change-of-Contact form and this formal answer, GIR has satisfied **all** corrective actions specified in the ORCNOV. Kindly confirm receipt and advise if any additional information is required.

Respectfully submitted,

Richard D. Mittasch Vice President | Grand Island Resources LLC 12567 W. Cedar Dr., Suite 110 | Lakewood, CO 80228 Phone: 720-893-3749 E-mail: <u>rmittasch@nedmining.com</u>

cc (electronic):

- Dave Lewis, ORC
- Stephanie Meyers, EPA Region 8
- Kelly Morgan, CDPHE
- Facility File CO0032751

Attachment:

1. Executed Change-of-Contact/ORC Designation Form (CO0032751)



PERMIT, CERTIFICATION, OR AUTHORIZATION NUMBER ______ (This number does not end in 0000)

(A separate form must be prepared for each Permit, Certification, or Authorization covered by these changes.)

PERMITTEE ORGANIZATION FORMAL NAME (If more than one please add additional pages) :

The legally responsible organization is either the owner or operator of the facility or project to which the permit has been issued, or both if designated as co-permittees by the Division. Changing the Permittee Organization name requires a modification of the permit and/or certification documents.

FACILITY NAME

ENTER ALL OF THE INFORMATION FOR EACH CONTACT WHERE THERE IS A CHANGE

1. **PERMITTEE** the person **authorized to sign and certify** the permit application. This person receives all permit correspondences and is **legally responsible** for compliance with the permit.

Responsible Positi	ion (title)	_	
Held by (person)			
Telephone #	email address		
Organization			
Mailing address			
City	State	Zip	

This form <u>must be signed</u> by the <u>Permittee</u> to be considered complete.

Per Regulation 61 In all cases, it shall be signed as follows:

a) In the case of corporations, by a responsible corporate officer. For the purposes of this section, the responsible corporate officer is responsible for the overall operation of the facility from which the discharge described in the application originates.

- b) In the case of a partnership, by a general partner.
- c) In the case of a sole proprietorship, by the proprietor.

d) In the case of a municipal, state, or other public facility, by either a principal executive officer or ranking elected official



CHANGE OF CONTACT(S) FOR ALL WQCD PERMITS, CERTIFICATIONS, AND AUTHORIZATIONS

Schedule submittals, reports (i.e. DMR's)	AL (i.e. authorized agent) the person authorized to sign and certify the by the permit, including Discharge Monitoring Reports (DMR's), Annual Rep , and other information requested by the Division. The Division will transn to this person. If more than one person, please add additional pages. DT SIGN APPLICATION FORMS.	
Responsible Position (title)		
Held by person)		
Telephone #	email address	
Organization		
Mailing address		
City	State Zip	
permit for the facil	T local contact for questions relating to the facility and discharge authoriz lity	ed by this
	email address	
Organization		
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Mailing address	State Zip	
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CHANGE OF CONTACT(S) FOR ALL WQCD PERMITS, CERTIFICATIONS, AND AUTHORIZATIONS

5. BILLING CONTACT				
Responsible Position (title)				
Held by person)				
Telephone # email address				
Organization				
Mailing address				
City	State Zip			
6. OTHER CONTACT TYPES (check below) Add pages if necessary. Responsible Position (title)				
Held by person)				
Telephone #	Telephone # email address			
Organization	Organization			
Mailing address				
City	State Zip			
Pretreatment Coordinator	Compliance Contact			
Environmental Contact	Stormwater MS4 Responsible Party			
Biosolids Responsible Party	Stormwater Authorized Representative			
Inspection Facility Contact	Property Owner			
Consultant	□ Other			

REQUIRED CERTIFICATION SIGNATURE [Reg 61.4(1)(h)]

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Date
_Title
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