



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

July 28, 2025

Richard Mittasch
Grand Island Resources LLC
12567 West Cedar Road, Suite 110
Lakewood, CO 80228

RE: Preliminary Adequacy Review; Technical Revision (TR-16) – Technical Revision Detailing How the 3-Series Ponds will be Reclaimed; Cross Gold Mine, Permit No. M-1977-410

Dear Mr. Mittasch,

On July 13, 2025, the Division of Reclamation, Mining and Safety (Division/DRMS) received your request for Technical Revision 16 (TR-16) providing a plan and details for reclaiming the 3-series ponds at the Cross Gold Mine, Permit No. M-1977-410. Please be advised that on August 12, 2025, the application for TR-16 may be deemed inadequate and denied unless the following items are addressed to the Division's satisfaction.

1. The submittal of the Technical Revision incorrectly assigned the revision number to be 17 (TR-17). The Division has assigned the revision number to be 16 (TR-16). The most recent technical revision for the permit was TR-15 which was approved on September 12, 2024. No comment needed.
2. In the proposal, the sediments contained within the ponds will only be sampled for Acid-Base-Accounting (ABA). In the conversion application currently under review it is stated that the host rock, ore and overburden materials are non-acid generating materials. The Division does not think that only ABA testing is appropriate to determine proper sediment disposal and will require additional sampling.
3. The ponds have been in use at the site since before the current Operator began activities at the site. The sources of the sediment along with the possibility of exposure to additives used during water treatment by the previous Operator's activities warrant additional testing. In the Division's 2Q2024 inspection report it recommended at the very least the sediment to be analyzed using TCLP or similar analysis. The Division will require that pond sediments be analyzed using TCLP or similar analysis (SPLP). Additionally, the Division will require TENORM testing of the sediments.



4. Please reaffirm the following, depending on the results of laboratory testing the liner material will be disposed of at a landfill or at an appropriately licensed disposable facility. At this time the Division does not believe that burial of the liner materials is appropriate.

This concludes the Division's preliminary adequacy review of your application. The Division reserves the right to further supplement this document with additional adequacy items and/or details as necessary.

The decision date for your application is set for **August 12, 2025**. If additional time is needed to respond, an extension request must be received by our Office by the decision date. If on the decision date, outstanding adequacy items remain, and no extension request has been received, your revision may be denied and the file terminated.

If you need additional information, please contact me by email at patrick.lennberg@state.co.us.

Sincerely,



Patrick Lennberg
Environmental Protection Specialist

cc: Jared Ebert; DRMS

ec: Richard Mittasch, Grand Island Resources, LLC, rmittasch@nedmining.com
Ben Langenfeld, Lewicki & Associates, PLLC, benl@lewicki.biz