

STATE OF
COLORADO

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

Cross Gold Mine – Adequacy Review Response, Reclamation of Ponds 3A-C (Permit M-1977-410)

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To: "Lennberg - DNR, Patrick" <patrick.lennberg@state.co.us>
Cc: Ben Langenfeld <benl@lewicki.biz>

Tue, Aug 5, 2025 at 5:22 PM

Dear Mr. Lennberg,

On behalf of Cross Gold Mine, please find attached our formal **adequacy-review response** for *Ponds 3A, 3B & 3C* under Permit M-1977-410.

The response package consists of:

1. **Adequacy Response Letter (dated 5 August 2025)** – describes the proposed removal of the three ponds, sampling and analytical protocols (TCLP & TENORM), liner handling and disposal criteria, backfilling and grading plan, and onsite recycling of cleaned liner material.
2. **Attachment Map F-2 – Pond 3 Reclamation Plan** – illustrates the layout and post-reclamation drainage toward the south.

Summary of key actions

- Replace ponds with a buried piping system that conveys mine water directly to the existing treatment plant CONEX.
- Perform silt sampling in accordance with EPA SW-846 and 6 CCR 1008-1, Part 20.
- Excavate liners and sediments and dispose of them at an approved facility when leachate limits are exceeded; otherwise, send non-hazardous material to a landfill.
- Backfill and grade each pond to create stable pads that shed water downslope, eliminating winter ice hazards.
- Re-use cleaned plastic liner sheets as waterproofing on onsite buildings.

These measures address DRMS's adequacy comments by improving long-term water management, ensuring proper waste characterization/disposal, and restoring stable post-mining topography.

Please confirm receipt of this submission at your earliest convenience. If any additional information is required, do not hesitate to contact me or our consulting engineer, Ben Langenfeld, P.E., at (720) 842-5321 ext. 1.

Thank you for your continued review and guidance.

Kind Regards,

Richard Mittasch, Vice President

8/6/25, 9:07 AM

State.co.us Executive Branch Mail - Cross Gold Mine – Adequacy Review Response, Reclamation of Ponds 3A-C (Permit M-1977-410)

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Cross Gold Mine TR 15-Pond Reclamation Adeq Resp.pdf

143K

August 5, 2025

Colorado Division of Reclamation, Mining, and Safety
1313 Sherman St, Rm 215
Denver, CO 80203

RE: Cross Gold Mine, M-1977-410
Technical Revision – Reclamation of Ponds 3A, B, & C

Mr. Lennberg

Cross Gold Mine is proposing to remove and reclaim Ponds 3A, B, & C. The removal of these ponds improve water management at the mine. Currently the ponds frequently freeze over in the winter, if they have water in them at all. The ponds will be replaced with a piping system that will convey mine water to the water treatment plant CONEX onsite for treatment. The ponds will be reclaimed in the following manner:

- 1) Sampling of the silts in the pond bottoms, including Toxicity Characteristic Leaching Procedure (TCLP) and technologically enhanced naturally occurring radioactive materials (TENORM).
 - a. TENORM testing will be conducted under EPA (SW-846) protocols in accordance with 6 CCR 1008-1, Part 20.
- 2) Based on the results of these tests, one of two liner removal procedures will be followed
 - a. If the silt in the pond show leachate over applicable limits, the silt and liners will be excavated and hauled to a waste disposal facility licensed to take potentially leaching material.
 - b. If the silt in the pond tests do not show leachate over applicable limits the silt and liners will be excavated and hauled to a landfill.
- 3) Following liner removal or capping, the ponds will be backfilled and graded to create pads that naturally drain to the south, downhill.

Additionally, once the liner is cleaned of all silts, the plastic will be recycled onsite for use as water proofing material for onsite buildings.

See the attached Map F-2 for details.

Regards,



Ben Langenfeld, P.E.
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(720) 842-5321, ex. 1
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Attachments

Map F-2 – Pond 3 Reclamation Plan