



City of Boulder Utilities

December 18, 2025

VIA ELECTRONIC SUBMITTAL

Mr. Patrick Lennberg
Environmental Protection Specialist
Colorado Division of Reclamation and Mining Safety
Colorado Department of Natural Resources
1313 Sherman St. Room 215
Denver, CO 80203

Re: Cross Gold Mine-File No. M-1977-410, Grand Island Resources LLC
Permit Conversion Application (CN-1)
Conversion Application to a Designated Mining Operation

Dear Mr. Lennberg:

The City of Boulder (“City”) is writing in response to Grand Island Resources’ (“GIR”) December 9, 2025, request to extend the review period and decision date for its Designated Mining Operation Conversion Application for the Cross Mine (“Application”) until February 6, 2026. GIR has also requested that the Division of Reclamation and Mining Safety (“Division”) support any “additional extension requests as needed, up to a total of approximately seven (7) months, to allow a complete and fully responsive record.”

The City strongly opposes any additional extension of time beyond February 6, 2026, for GIR to respond to adequacy items identified by the Division.

Since 2022, when the Division determined that GIR was required to submit a DMO Application, GIR has received multiple extensions of time to satisfy this requirement, including two separate one-year extensions. The second request for a one-year extension was granted only after a full hearing before the Mined Land Reclamation Board (“Board”), which specifically determined that if the Application “does not obtain approval from the Division within the statutory time limit, no additional time for Division consideration of the DMO Application will be granted and the life of the mine shall be ended and [GIR] must begin final reclamation in accordance with all applicable rules.” *See April 11, 2024, Mined Land Reclamation Board Findings of Fact, Conclusions of Law and Order at p. 3 (the “Order).* These conditions were specifically requested by the Division. *Id.* at 2.

Following submittal of a complete application, the applicable statute and rules provide a maximum of 365 days for the applicant to respond to adequacy requirements and for the Division to issue a

recommendation. Because the Application was deemed complete on February 6, 2025, the deadline is February 6, 2026. By that time, GIR will have had almost four years to submit its application and any additional information requested by the Division.

Providing the Applicant with additional time to meet its obligations unnecessarily consumes the resources of the Division, the Board and the public. The City respectfully requests that, in accordance with the Board's previous Order, no additional time beyond February 6, 2026, be provided for GIR to respond to the Division's adequacy reviews, and that the Division's recommendation be issued on or before that date.

Sincerely,



Joe Taddeucci
City of Boulder, Director of Public Works – Utilities

Cc: Kate Dunlap, City of Boulder, Drinking Water Quality Manager
Meghan Wilson Outcalt, City of Boulder, Water Quality Senior Manager
Kim Hutton, City of Boulder, Water Resources Manager
Leila Behnampour, City of Boulder, Assistant City Attorney



STATE OF
COLORADO

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

City of Boulder objections related to M-1977-410

Dunlap, Kate <DunlapK@bouldercolorado.gov>

Thu, Dec 18, 2025 at 1:01 PM

To: "Patrick Lennberg, DRMS" <patrick.lennberg@state.co.us>

Cc: "Taddeucci, Joe" <Taddeuccij@bouldercolorado.gov>, "Wilson Outcalt, Meghan" <WilsonM@bouldercolorado.gov>, "Hutton, Kim" <Huttonk@bouldercolorado.gov>, "Behnampour, Leila" <BehnampourL@bouldercolorado.gov>

Dear Patrick,

Please find attached the City of Boulder's objections to Grand Island Resource's (M-1977-410) request for additional application extensions beyond the required deadline of February 6, 2026. We appreciate the opportunity to comment on this application and please let us know if you have any questions. Thanks,

Kate

Kate Dunlap (she/ella)

Drinking Water Quality Manager



**City of Boulder
Utilities**

dunlapk@bouldercolorado.gov

303.413.7402

Utilities Department

[5605 N. 63rd Street | Boulder, CO 80301](https://www.bouldercolorado.gov/water)

[Bouldercolorado.gov/water](https://www.bouldercolorado.gov/water)

[2025.12.18_CityofBoulder_Objection_to_GIR_Extension.pdf](#)
225K



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

City of Boulder objections related to M-1977-410

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

Thu, Dec 18, 2025 at 1:03 PM

To: "Dunlap, Kate" <DunlapK@bouldercolorado.gov>

Cc: "Taddeucci, Joe" <Taddeuccij@bouldercolorado.gov>, "Wilson Outcalt, Meghan" <WilsonM@bouldercolorado.gov>, "Hutton, Kim" <Huttonk@bouldercolorado.gov>, "Behnampour, Leila" <BehnampourL@bouldercolorado.gov>

Thank you.

I will place a copy in the permit file and send a copy to the Operator.

Patrick

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Patrick Lennberg
Environmental Protection Specialist



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

P 720.665.0836 | F 303.832.8106

Physical Address: [1313 Sherman Street, Room 215, Denver, CO 80203](https://drms.colorado.gov)

Address for FedEx, UPS, or hand delivery:

1001 E 62nd Ave, Denver, CO 80216

Patrick.Lennberg@state.co.us | <https://drms.colorado.gov>



STATE OF
COLORADO

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

City of Boulder objections related to M-1977-410

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

Thu, Dec 18, 2025 at 1:04 PM

To: Richard Mittasch <rmittasch@nedmining.com>, Ben Langenfeld <benl@lewicki.biz>

Good Afternoon,

Please see the attached letter from the City of Boulder.

Thank you,

Patrick

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 2025.12.18_CityofBoulder_Objection_to_GIR_Extension.pdf
225K