REPUBLIC OF BULGARIA
MINISTRY OF THE ENVIRONMENT AND WATER

BASIN DIRECTORATE "EASTERN BLACK SEA REGION"

Ref. No. PU-01-183 (5) Plovdiv,...26.05.2023

To

MS MARIANA VALCHEVA
DIRECTOR OF
RIOSV - HASKOVO
14 DOBRUJA STREET, FLOOR 5 6300, HASKOVO
6300, HASKOVO RE: Opinion pursuant to Art. 155, para. 1, item 23 of the Water Act on "Extraction and processing of polymetallic ores from the "Razlog" deposit in the territory of

Re: Opinion pursuant to Article 155, paragraph 1, item 23 of the Water Act on "Extraction and processing of polymetallic ores from the Rosino deposit, Tintyava area," commissioned by Tintyava Exploration AD.

DEAR MS. VULCHEVA,

In response to your letters ref. No. PD-279-(4)/21.02.2023 requesting an opinion pursuant to Article 4a, paragraph 1 of the EIA Ordinance, after reviewing the attached notification and additional information received, The East Aegean Sea Basin Directorate*[4](EASBD) expresses the following opinion:

I. Assessment of the admissibility of the investment proposal in relation to the environmental protection objectives and measures set out in the River Basin Management Plan for the Eastern Black Sea Region (RBMP for the EBR) and in the Flood Risk Management Plan for the Eastern Black Sea Region (FRMP for the EBR).

1 .1. Characteristics and purpose of the IP: The investment proposal of the contracting authority provides for the extraction and processing of polymetallic (gold-silver) ores from the "Rozino" deposit, Tintyava area, with the future concession area amounting to 3044.7 decares, of which the disturbed area will be 1308.5 decares. The main activities included in the proposal are:

- open-pit mining of polymetallic ores:
- processing of the ore by flotation to obtain concentrate;
- construction and operation of the necessary accompanying infrastructure - roads, water supply, electricity supply, material storage facilities, mining waste facilities, etc.;
- phased recultivation of the affected areas.

The investment proposal is new and is not related to the expansion or modification of existing activities.

The first two years are planned to be devoted to mine construction, with the following to be achieved by the end of the second year: sufficient exposed and ready reserves for extraction will be secured; the ore processing plant will be built; the retaining wall of the tailings pond will be completed to a height of 360 m, as well as the adjacent infrastructure; the retaining wall and adjacent infrastructure for the contact water reservoir will be built, with a retaining wall height of 311 m; the retaining wall and adjacent infrastructure for the non-contact (conditionally clean) water reservoir will be built, with a height of 305 m; approximately 90% of the soil and humus masses from the project areas will be selectively collected and deposited. These will be selectively deposited in two separate landfills for soil and humus (soil material).

The rock overburden (mining waste) at the Rozino deposit is solid rock that does not contain any useful components but covers the ore-bearing rocks or is mixed with them. For this purpose, it is necessary to remove it selectively. For this purpose, drilling and blasting works (DBW) will be carried out, with a millisecond delay, to separate the sterile part from the massif, loading by excavator onto dump trucks and transport to dumps for sterile rock mass.

For the conditions of the Rosino deposit, separate disposal is planned for:

Topsoil;

Sterile rock overburden.

The technology includes the following sequential processes:

Crushing, sorting, and transport;

- Storage of crushed ore (covered piles);
- Grinding (ball mill);
- Flotation;
- Thickening of flotation tailings;
- Thickening of the concentrate and filtration;
- Deposition of flotation waste.

The deposit will be developed using an open-pit method, through PVR. Once the ore reserves have been exposed and prepared for extraction, they will be separated from the massif by means of millisecond blasting of the J1OHEJI type. The open-pit mine will be divided into two mining areas to allow for timely, phased recultivation. The extracted ore will be loaded and transported to the crushing plant.

The ore crushing scheme consists of three crushing stages: primary jaw crusher, followed by secondary and tertiary cone crushers. The grinding area consists of a ball mill operating in a closed circuit with a group of cyclone classifiers.

The flotation process flow diagram will consist of two tanks with agitators for pulp preparation, four cells for primary flotation, two cells for purification, and two cells for final flotation. The flotation plant will be designed to process up to 1.75 million tons of ore per year. The nominal capacity of the flotation plant is 217 tons (dry material) per hour. The main enrichment process for separating gold and silver from the ore will be carried out by flotation. It will be implemented in flotation machines, where the separation of the useful component from the rock mass is carried out on the basis of the different surface properties of the minerals and the rock mass. The useful component, in this case gold-silver concentrate, in the form of foam, flows over the edges of the flotation cell and enters the next stage of the operation. The waste from ore enrichment by flotation (mining waste) is discharged from the bottom of the cell and deposited in a tailings pond. The flotation line is fed with pulp from the hydrocyclones in the grinding section by gravity. For the flotation process to take place, it is necessary to add reagents such as a foaming agent (methyl isobutyl carbinol - MIBC), a collector (potassium amyl xanthate - PAX), etc. The most cost-effective solution is to deposit compacted (semi-dry) flotation waste. The deposit technology will be based on the "Downstream" method - building a sand prism from flotation waste. After separation in the enrichment process, the waste is compacted in a thickener (settler) and then transported by slurry pumps to the mining waste facility - tailings storage facility. It is planned to store 8,575 million tons (6,125 million м3) of mining waste over a period of 6 years. After the sixth year, the waste, which is classified as non-hazardous because laboratory tests and analyses show that it does not contain hazardous and priority hazardous substances, will be used to backfill the pit of Section 2 of the mine. After this period, the tailings storage facility will no longer be used and will be recultivated. A drainage system is planned under the tailings pond to collect filtered water, including rainwater.

The extraction of polymetallic ores from the Rosino deposit has an expected operating period of 9 years, with:

- an average annual open-pit production of 3,310,546 tons or 1,362,365 m³ over a period of X years;
- average annual ore production of 1,750,000 tons or 720,165 m^3over a period of 6.5 years.

The approved 9-year operating period includes 2 years of mine construction, 6.5 years of main extraction and processing, and 0.5-4 years of a winding-down period, during which only low-grade raw material ( ) will be processed.

The implementation of the investment project will require quantities of water for production needs in the enrichment plant, for irrigation during dust suppression, and for drinking and domestic needs of the personnel.

According to the information in the notification, a hydrological survey, defined in a hydrogeological report, was conducted to determine the availability of water resources from surface water bodies, and it was found that during the period January-May, when there is sufficient flow in the river, it is possible to use water from Arpa

Dere, in the area of the Rosino pumping station (PS) at a flow rate that would provide a minimum water quantity of 50 1/s (expected total volume of 648,000 m³), equal to 10% of the average annual water quantity, as well as guarantee the ecological minimum in the river. During this period, through continuous water pumping, an open reservoir for non-contact water will be filled.

A possible option for water pumping is the construction of a pumping station in the area of the existing PS "Rozino", which is used for the supply of drinking water to the village of Rozino. Due to the higher flow rate in February, March, and April, a higher flow rate of about 100 1/s can be used during these months to fill the non-contact water reservoir on days with higher rainfall.

Rainwater will accumulate within the catchment area in the Rosino mine pit, depending on the exposure of the mine over the years. This water will be drained into an open reservoir for contact water and will be used in the technological process.

The hydrogeological study conducted in the area of the deposit found that the underground water has an insignificant flow rate and its extraction is extremely insufficient for technological needs.

For optimal water consumption, part of the water will be reused, for which an open contact water tank will be built.

Bottled water will be provided for drinking purposes. Water from the non-contact tank will be used for domestic purposes (for sanitary facilities).

The activity does not envisage the emission of priority or hazardous substances that come into contact with water. All facilities where chemicals are used will be closed and isolated from the ground surface.

The following wastewater is expected to be generated at the site: production wastewater from the flotation and dewatering of the concentrate, and domestic and fecal wastewater from the workers at the mining site. All this water will be recycled, with the open contact water tank serving as a buffer volume.

The implementation of the investment proposal does not envisage the discharge of production wastewater into water bodies or into the sewage system of populated areas.

Two options are being considered for the treatment of domestic sewage:

- to build watertight underground septic tanks, which will be serviced by a company holding the relevant rights under the applicable legislation; or
- to install a local treatment plant (operating with active microbiological sludge), with the treated water being discharged into the contact tank.

Surface rainwater and water from mine drainage will be collected and discharged into the contact water tank.

During the procedure, the BD IBR officially requested information on the location of all water intake facilities for drinking and domestic water supply for which the BD IBR has no information and which are located in the territories of the settlements in the area of the Rosino deposit, Tintyava area, respectively from the Municipality of Ivaylovgrad, the Municipality of Krumovgrad, and "V and K" EOOD, Haskovo. Letters were submitted from the Municipality of Ivaylovgrad, ref. No. PU-01-183(3)/10.05.2023, Municipality of Krumovgrad with ref. No. PU-01-183(4)712.05.2023 and "V and K" EOOD, Haskovo with ref. No. PU-01-183(2)703.05.2023

1.2. Location: According to the information provided (coordinate register of the contours of the Rosino deposits, Tintyava area), the IP is located within the scope of underground water body **BG3G000PtPg049 - Fissured waters - Eastern Rhodope complex.** Underground water bodies according to Section 111 of the RBMP of the IBR are declared as drinking underground water bodies within the meaning of Article 119, paragraph 1, item 1, in conjunction with paragraph 4, item 1 of the Water Act. There are designated water protection zones in the groundwater bodies under Article 119a, paragraph 1, item 1 of the Water Act (WA). The deposit is not located in a vulnerable water protection zone included in Section 3, point 3.3.1 of the RBMP of the IBR. The IP is not located within the boundaries of an established sanitary protection zone around groundwater sources.

The closest water sources for drinking and domestic water supply from groundwater in the area of the Rosino deposit are:

- About 2000 m south of point 7 describing the contour of the future concession area is located the TC of PS "Gugutka" for drinking and domestic water supply to the villages of Gugutka and Byal Gradets, municipality of Ivaylovgrad, Haskovo region. There is no SHP built around the water intake facility in accordance with Ordinance No. 3/10.10.2000. There is no sanitary protection zone around the water intake facility in accordance with Ordinance No. 3/10.10.2000.
- There is no sanitary protection zone built around the water intake facility in accordance with Ordinance

No. 3/10.10.2000. About 500 m east of point 6 describing the contour of the future concession area is the "Rozino" water intake facility, located in the territory of the village of Pastrok, municipality of Ivaylovgrad, for drinking and domestic water supply, owned by the State Forestry. There is no sanitary protection zone around the water intake facility in accordance with Ordinance No. 3710.10.20001*.

The Rozino deposit falls within the boundaries of the surface water body (WB) **"Biala River and its tributaries" with code BG3MA100R270.** There are designated water protection zones (33) in the water body pursuant to Article 119a, paragraph 1, item 5 of the Water Act (WA). The IP does not fall within a sensitive area under Article 119a, paragraph 1, item 3, letter "i" of the WA, described in Section 3 of the RBMP of the IBR. The IP does not fall within water protection zones designated under Article 119a, paragraph 1, items 2 and 4 of the WA.

The IP falls within the boundaries of water protection zone 33 "Eastern Rhodopes" with code BG0001032, designated in accordance with Article 119a, paragraph I, item 5 of the Water Act, included in Section 3, point 3.5.1 of the RBMP of the IBR. The IP falls within the boundaries of water protection zone 33 "Biala Reka" with code BG0002019, designated in accordance with Article 119a. para. 1, item 5 of the Water Act, included in Section 3, point 3. 5. 2. of the RBMP of the IBR (only 1.12 describing the boundaries of the concession area is located outside the zone).

The Rosino deposit is located outside the areas identified as having a significant potential risk of flooding in the IBR and does not fall within areas that may be flooded according to the maps of areas at risk of flooding, under the scenarios specified in Article 146e of the Water Act.

1.3. Status of water bodies and environmental protection objectives;

1.3.1. **Status according to the RBMP of the IBR:** According to Section 4, points 4.2.2 and 4.2.3 of the RBMP of the IBR, groundwater body **BG3G00()PtPg049** is in good chemical status and good quantitative status. The environmental protection objective for groundwater body **BG3GOOOPtPgU49** is to maintain good chemical status and prevent deterioration.

Surface water body with code **BG3MA100R270** has been determined to be in good ecological status and good chemical status. The environmental protection objective for this specific water body (in accordance with the provisions of Chapter X, Section III of the Water Act) is to preserve its good ecological status and prevent its deterioration, to preserve its good chemical status and prevent its deterioration, and to achieve the objectives for water protection areas.

1.3.2. Status according to the latest annual assessment: The surface water body **"Vata River and its tributaries" has code BG3MA100R270.** According to data from monitoring carried out in 2021, it has been determined to be in good ecological status and good chemical status.

1.3.3. Conclusion on the availability of data on the deterioration or improvement of the status of the water body compared to that assessed in the RBMP. For water body code **BG3MA100R270**, the ecological and chemical status has been maintained in accordance with point 1.3.1.

1.4. Measures provided for in the RBMP and the IBR's RBMP:

1.4.1. Measures in the RBMP of the IBR. The measures for achieving the objectives for the protection of groundwater and surface water bodies and water protection areas are described in the annexes to Section 7 of the 11URB of the IBR. The following measures can be applied to the specific I11:

- Measure: Prevention of deterioration of water status from projects and activities at the investment proposal stage, code RM 9. Action for implementation of the measure - Prevention of the implementation of investment proposals leading to negative changes in the status of water bodies, code RM 9 2.
- Measure: Restoration and protection of river banks and river beds from erosion, with measure code HY 1 1, action for implementation of the measure: 8. Prohibition of cutting natural coastal vegetation, with action code HY 1 1.
- Measure: "Improvement of the hydromorphological status of rivers" is measure code HY 7, action for implementation of the measure: Prevention of new negative changes in the hydromorphological regime (caused by hydroelectric power plants, removal of sediment deposits from reservoirs, new water intakes, etc.) in water bodies designated as or falling within water protection areas, with code HY 7 1.

For PWT BG3G000PtPg049 - Fissured waters - Eastern Rhodope complex, the following measure applies:

- Study to determine pollution of surface and groundwater is measure code OS3, with Action for implementation of the measure - 3. Conducting exploratory monitoring to identify sources of pressure in cases of established deterioration of the status of the water body and unidentified sources of this pressure, with action code OS 3 3 and Specification of the action - Conducting monitoring to identify sources of pressure in cases of established deterioration of the status of the water body and unidentified sources of this pressure. The measure applies to the entire groundwater body.

- In Annex 4, Section 7 of the RBMP for the IBR, a measure is provided for with code: I. General measures; 1. The planning and implementation of all activities within the framework of the RBMP shall not conflict with the regimes of the protected areas established by the orders for their declaration and management plans, as well as with the regimes of the protected territories introduced by the Protected Areas Act, the orders for their declaration and management plans. The measure has code I_ I.

1.4.1.1. Specific requirements and measures in the RBMP related to water **protection areas**. The entire concession area falls within the scope of protected area 33 "Eastern Rhodopes" with code BG0001032 and 33 "Biala Reka" with code BG0002019 (only point 12 describing the boundaries of the concession area is located outside the zone), which were declared by Order No. RD-267 of March 31, 2021, and RD-575/08.09.2008, introducing a number of prohibitions and restrictions.

The RBMP of the IBR (2016-2021) provides for a measure with code HY_1_1 8. Prohibition of logging of natural coastal vegetation, action code HY 1 1, relating to the part of the water bodies falling within the water protection zones under Article 119a, paragraph 1, item 5 of the Water Act.

The planned concession area covers a large part of the catchment area of the Yuren Dere River, a right tributary of the Arpa Dere River, and it is possible that there is natural coastal vegetation to which the prohibition on cutting applies. No measures are planned for water protection areas.

1.4.2. Measures in the IBR's PUD: The measures from the IBR's PUD Program of Measures are described in the Annexes to Section 5 of the IBR's PUD. No measures are provided for in the IBR's PUD for the area of the specific IP.

1.4.2.1. Assessment of the possible increase in flood risk upon implementation of the IP. We believe that the implementation of the IP will not lead to a significant increase in flood risk.

2. Prohibitions and restrictions provided for in the Water Act with regard to this type of investment intentions.

2.1. Prohibitions, restrictions, and requirements included in the Water Act:

According to Article 116, paragraph 1, item 4 of the Water Act, all waters and water bodies shall be protected from depletion, pollution, and damage in order to maintain the necessary quantity and quality of water and a healthy environment, preserve ecosystems, conserve the landscape, and prevent economic damage, including ensuring the development of aquatic ecosystems and related terrestrial ecosystems.

The prohibitions of Art. 118, Art. 118a, para. 1, items 1, 2, 3, and 4 of the Water Act for the protection of groundwater from pollution shall be observed.

In accordance with the provisions of Article 46(2) of the Water Act, the construction of structures, engineering structures, buildings, and others, where contact with groundwater occurs and/or is possible, shall be carried out under the conditions and in accordance with the procedure of the Spatial Development Act, in compliance with the requirements for the protection of groundwater under Chapter VIII of 3R

In compliance with the provisions of Article 156a, paragraph 1, item 2 of the Water Act, it is necessary at all stages of planning, design, construction, and maintenance of the facilities to be built to provide for measures to protect the waters of underground water bodies from pollution.

Water abstraction from surface or groundwater is subject to a permit regime pursuant to Article 44(1) of the Water Act.

The construction of new facilities in a water body is subject to a licensing regime pursuant to Article 46(1)(1) of the Water Act.

2.2. Prohibitions, restrictions, and requirements included in subordinate legislation to the Water Act: For water abstraction facilities that do not have an established sanitary protection zone in accordance with Ordinance No. 3/16.10.2000 on the conditions and procedure for the study, design, approval, and operation of sanitary protection zones around water sources and facilities for drinking water supply and around mineral water sources used for therapeutic, prophylactic, drinking, and hygiene needs (published in State Gazette No. 88 of 27.10.2000), it is necessary to take into account the measures in Annex No. 1 to the National Catalogue of Measures for the RBMP, R List of activities, prohibitions, or restrictions in drinking water protection zones in the section on groundwater, additional prohibited activities, 2. in the buffer zone within a radius of 1000 m from the water intake facility, where no sanitary protection zone has been established.

For groundwater bodies or parts thereof located in the first horizon (which is exposed on the surface), the following prohibitions apply:

- Extraction of underground resources, including inert and construction materials, below the water level.
- Activities that lead to the indirect discharge of hazardous substances into the water body from the earth's surface or between the earth's surface and the water level.

- Activities that lead to the indirect discharge of harmful substances into the water body between the earth's surface and the water level.

Activities that are not prohibited but may be permitted if special studies (EIA procedure) prove that they will not affect the condition of the waters in the protection zone and/or as a result of which no additional treatment will be required to ensure the necessary quality of drinking water, to the same annex, for groundwater bodies or parts thereof located in the first horizon (which is exposed on the surface) include:

-Extraction of underground resources, including inert and construction materials between the earth's surface and the water level;

-Extraction of underground resources in the area of water abstraction for drinking and domestic water supply to the population, without specific studies and research proving that the extraction activity does not lower the groundwater level and there is no risk of deterioration of its quality;

- Construction of geological, hydrogeological, and engineering-geological research facilities, including water intake facilities for groundwater in the underground water body (aquifer).

- Activities that lead to the indirect discharge of harmful substances from the earth's surface into the water body.

Conclusion: The investment proposal **is acceptable** from the point of view of the RBMP and the RBMP of the IBR (2016-2021), the Water Act and its subordinate legislation, subject to the following conditions:

- No pollution of surface and groundwater bodies from the activities related to the operation of the investment proposal shall be allowed.
- No activities that could lead to a negative change in the status of water body **BG3MA100R270** shall be allowed**.**
- No direct or indirect discharge of hazardous and harmful substances into groundwater shall be allowed during the implementation of the IP.
- No cutting of natural coastal vegetation shall be allowed.
- Water abstraction from surface or groundwater shall be carried out after a permit has been issued in accordance with Article 44(1) of the Water Act.
- The construction of facilities in a water body shall be carried out after a permit has been issued in accordance with Article 46(1)(1) of the Water Act.
- Protection of drinking water sources in the area of the investment project in terms of their quantity and quality.
- The construction of drainage ditches around the perimeter of the mine field and the open pit mine shall be provided for in order to collect rainwater and snowmelt from higher elevations and prevent surface water from entering the mine pit.
- Given your intentions to fill the reservoir for non-contact water from the Arpa Dere River, in the area of the pumping station (PS) "Rozino," the Company needs to take appropriate and applicable measures to introduce the reuse of rainwater, wastewater, and drainage water, which should be included in a closed cycle, in order to reduce the planned water intake and ensure the efficient use of water.
- To assess the presence of negative changes in the hydromorphological regime of the Arpa River resulting from the implementation of the investment project and related to the planned water intake for filling the non-contact reservoir, prepared by experts in the relevant field.
- The construction and operation of the tailings pond shall comply with the requirements of the Spatial Development Act (SDA), the Underground Resources Act (URA), and the Ordinance on the Management of Mining Waste. The standards for the design of concrete and reinforced concrete structures for hydraulic engineering facilities. The standards for the design of retaining walls. The standards for the design of hydraulic engineering facilities. The necessary conditions to ensure the short-term and long-term safe disposal of waste.

- No mining activities shall be carried out within a radius of 1000 m from water intake facilities around which no sanitary protection zone has been established.
- A characteristic description of the hydrogeological conditions and factors (based on hydrogeological studies and a hydrogeological report submitted to the IBAR database) affecting the quantity and quality of groundwater in the area should be made in order to clarify the impact of the exploitation of the Rosino deposit on groundwater, specifically on the water sources for drinking and domestic water supply to the settlements in the area of the

deposit. The study should also include information on the existence of water intake facilities submitted by the Municipality of Ivaylovgrad with ref. No. PU-01-183(3)710.05.2023, the Municipality of Krumovgrad, ref. No. PU-01-183(4)712.05.2023, and V and K EOOD, Haskovo, ref. No. PU-01-183(2)703.05.2023.

• Drilling and blasting works will be used for the exploitation of the Rosino deposit. In this regard, an assessment must be made of the impact of drilling and blasting works on groundwater in the area of the investment project and, in particular, on water sources for drinking and domestic water supply. A report on the impact of drilling and blasting operations on groundwater in the Rosino deposit area should be submitted to the BDIBR.

• At the next stage, the planned extraction depth should be specified.

• The possible impact of the investment proposal on surface waters should be examined in terms of compliance with the provisions of Article 116(1)(4) of the Water Act and the measures set out in the IBR's G1URB (2016-2021) relevant to the current IP.

• Regarding the plan to use the flotation waste after the sixth year to backfill the pit of Section 2 of the mine, a description of the mining waste should be prepared at the next stage of the procedure in order to determine its properties and behavior.

• A watertight cesspool should be constructed in accordance with technical and sanitary-hygienic requirements. The waste water generated should be periodically cleaned and transported to a regulated site by persons holding the necessary documents in accordance with the legislation in force. Please note that only domestic sewage may be discharged into the watertight pit. in accordance with Article 46(4)(2) of the Water Act in conjunction with Article 87(1) of the Spatial Development Act.

• No contamination of the extraction site with fuel and lubricants from technical equipment and other pollutants shall be allowed.

• The prohibitions specified in the orders declaring 33 ..Rhodopes - East" with code BGOOOIO32 and 33 ..Biala Reka" with code BG0002019 shall be observed.

3. Information on existing and permitted impacts of the nature of the IP. There is no systematic information on the nature of the IP **in the** IBAR **database**.

4. Information on available water resources in the part of the groundwater body where water abstraction is planned.

5. A reasoned assessment of the significant impact on water and aquatic ecosystems.

Considering that:

- there is no description of the hydrogeological conditions and factors (based on hydrogeological studies and a hydrogeological report submitted to the IBAR database) affecting the quantity and quality of groundwater in the area, in order to clarify the impact of the exploitation of the Rosino deposit on groundwater, specifically on the water sources for drinking and domestic water supply to the settlements in the area of the deposit;

- there is no characterization of mining waste in order to determine its properties and behavior;

- there is no assessment of the impact of drilling and blasting operations on groundwater in the area of the investment proposal and, in particular, on water sources for drinking and domestic water supply;

- there is no analysis of the possible impact of the investment proposal on surface waters in terms of compliance with the provisions of Article 116(1)(4) of the Water Act and the measures set out in the IBR's RBMP (2016-2021) relevant to the present IP.

In view of the circumstances described above, the IBR DB considers that the operation of the IP is likely to have a negative impact on the waters and aquatic ecosystems in the Rosino deposit area.

6. Conclusion on the applicability of Article 93, paragraph 9, item 3 of the Environmental Protection Act. We consider that Article 93, paragraph 9, item 3 of the Environmental Protection Act is not applicable to the investment proposal, as the investment proposal does not fall within the scope of Article 156c, paragraph 3, items 2 and 3 of the Water Act.

Attachments: 1. A copy of the letter is ref. No. PU-01-183(3)/10.05.2023 from the Municipality of Ivaylovgrad;

2. Copy of letter ref. No. PU-01-183(4)712.05.2023 from the Municipality of Krumovgrad;

3. Copy of letter ref. No. PU-01-183(2)/03.05.2023 from ..V and K" EOOD, town of Haskovo.

Yours sincerely,

VASIL UZUNOV
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