



Eschberger - DNR, Amy <amy.eschberger@state.co.us>

Mark Steen shared "CMC RESPONSE LTR TO DRMS NO. 5" with you.

1 message

Mark Steen <goldtontine@gmail.com>

Thu, Sep 12, 2019 at 2:42 PM

To: "amy.eschberger@state.co.us" <amy.eschberger@state.co.us>

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COLORADO MILLING COMPANY, LLC
P.O. Box 1523
Longmont, Colorado 80502

Colorado Division of Reclamation, Mining and Safety
Attention: Amy Eschberger
1313 Sherman Street – Room 215
Denver, Colorado 80203

September 12, 2019

Sent via email: amy.eschberger@state.co.us

**RE: Gold Hill Mill, Permit No. M-1994-117, Amendment Application
(Revision No. AM-01), Adequacy Review No. 5**

Attention: Amy Eschberger:

This is the Colorado Milling Company, LLC's Response Letter to the first five items listed in Amy Eschberger's July 23, 2019 Adequacy Review No. 5 of the Application for an Amendment to the Gold Hill Mill Limited Impact 110 (2) Permit No. M-1994-117, to formally add the previously permitted Left Hand Creek Pump Station, Gold Hill Mill Pipeline, and the Times Mine adit portal to the affected land boundary of the Gold Hill Mill Permit. These three features are collectively referred to as the Gold Hill Mill Waterline in this Response Letter. In order to ensure that the responses to the Division of Reclamation, Mining and Safety's request for additional information and clarification can be properly reviewed, the responses are set out below each of Amy Eschberger's Adequacy Review comments.

Exhibit C – Mining Plan (Rule 6.3.3):

- 1) The operator's response to Item no. 1(a) states the requested mine pool drawdown plan cannot be developed and submitted to the Division until a pumping test has been conducted at the site. Therefore, the Division has the following comments regarding this item:
 - a. Please provide a pumping test plan detailing the proposed procedures. This plan should include a detailed description of how water pumped from the workings will be managed during testing, and whether a discharge permit will be required from the CDPHE, WQCD.

CMC Response: The Times and Wynona Mines pump test has been designed to determine the mine pool volume above the collar of the winze that connects the Times Mine with the Wynona Mine workings. To perform this evaluation, mine pool drawdown data from a pumping test needs to be acquired. The pump test involves the following activity:

1. Measure and record static water levels in the Times Mine well and the Wynona Mine shaft.
 2. Start the Gould's Model 85GS pump currently installed in the Wynona Mine shaft.
 3. Establish a steady water flow rate from this pump.
 4. Measure and record water flow rates, totalized volumes and water levels in both the Times Mine well and the Wynona Mine shaft well every five (5) minutes and document these flow rates, totalized volumes, and water levels.
 5. The data from the pump test would then be used to create a mine pool elevation to capacity curve. Along with the pump test data, this curve would be used to develop a mine drawdown plan.
 6. The pumping test should help establish the elevation of the Wynona Mine 100 Foot Level, which will assist in determining the water volume above the Times Mine workings.
 7. Water pumped from the Wynona Mine shaft well will be pumped into the two steady head tanks located inside the Gold Hill Mill, where a totalizing flow meter will be installed to measure the discharge from the Wynona Mine shaft well.
 8. All of the mine water collected in the two steady head tanks will be contained in the large thickener tank located on the Flotation Level inside the Gold Hill Mill, which has the capacity to hold more than 50,000 gallons of water.
 9. The Times Mine Bulkhead pressure gauge will be monitored on a predetermined basis to determine the effects of different water levels in the Times and Wynona mines on the bulkhead pressure. The results obtained from these observations will help determine the actual amount of water that needs to be pumped from the underground mine workings to control the bulkhead pressure.
 10. No mine water will be discharged during the pump test. Therefore, a discharge permit from the CDPHE and the WQCD will not be required to conduct this pump test.
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b. Because the site is still under a Temporary Suspension by the BLM, please commit to demonstrating to the Division, prior to initiating the pumping test, that the BLM has authorized this activity to occur at the site.

CMC Response: CMC commits to demonstrating to the DRMS, prior to initiating the pumping test, that the BLM has authorized this activity at the Gold Hill Millsite. Based upon previous communications between CMC and the BLM, it does not appear that the BLM will not authorize this pumping test, since all of the underground mine workings where water is stored are located on patented mining claims owned by CMC.

c. Please be advised, submittal of the requested mine pool drawdown plan will be a stipulation of AM01 approval, requiring this plan be submitted in the form of a Technical Revision for Division review and approval, prior to mill operations commencing at the site. Please acknowledge your acceptance of this stipulation.

CMC Response: CMC acknowledges that a mine pool drawdown plan will be a stipulation of Revision AM 01 approval, requiring that this plan be submitted in the form of a Technical Revision for DRMS review and approval, prior to milling operations commencing at the Gold Hill Millsite.

- 2) The operator's response to Item no. 1(d) states the operator is awaiting the results of the Deere & Ault's mine pool control plan and monitoring plan to determine if it is necessary to maintain the water levels in the mine workings below the design standard for the Times Mine Bulkhead.

Please be advised, until the Division has reviewed and approved the new engineer bulkhead evaluation based on the results of the proposed pumping test, and including different recommendations than those included in the evaluation submitted to the Division on May 17, 2019, the operator must commit to maintaining water levels in the mine workings below the design standard for the bulkhead, 17.6 feet of head or an elevation of 8,360 feet during operations, including weekly monitoring of water levels.

CMC Response: CMC commits to maintaining water levels in the mine workings at an elevation of 8,360 feet during operations until the DRMS has reviewed and approved the new bulkhead evaluation based on the results of the proposed pumping test, which may include different recommendations than those included in the Deere & Ault Consultants evaluation of the Times Mine Bulkhead submitted on May 17, 2019. CMC commits to conduct weekly monitoring of water levels during operations.

- 3) The operator's response to Item no. 1(e) states the operator is awaiting the results of the Deer & Ault's mine pool control plan and monitoring plan to determine the actual Times Mine Bulkhead pressure and the effects of different water levels in the Times and Wynona Mines on the bulkhead pressure.

Please be advised, until the Division has reviewed and approved the new engineer bulkhead evaluation based on the results of the proposed pumping test, and including different recommendations than those included in the evaluation submitted to the Division on May 17, 2019, the operator must commit to maintaining the bulkhead pressure below the design standard for the bulkhead, 7.6 psi (with 17.6 feet of head) during operations, including weekly monitoring of bulkhead pressure.

CMC Response: CMC commits to maintaining the Times Mine Bulkhead pressure below 7.6 psi (with 17.6 feet of head) during operations until the DRMS has reviewed and approved the new bulkhead evaluation based on the results of the proposed pumping test, which may include different recommendations than those included in the Deere & Ault Consultants evaluation of the Times Mine Bulkhead submitted on May 17, 2019. CMC commits to conduct weekly monitoring of the Times Mine Bulkhead pressure during operations.

- 4) The operator's response to Item no. 1(f) states the operator is awaiting the results of the Deere & Ault's mine pool control plan and monitoring plan to determine the frequency of the inspection of the Times Mine bulkhead.

Please be advised, until the Division has reviewed and approved the new engineer bulkhead evaluation based on the results of the proposed pumping test, and including different recommendations than those included in the evaluation submitted to the Division on May 17, 2019, the operator must commit to inspecting the bulkhead on a weekly basis during operations to document conditions, including any increases in seepage or the development of any concentrated areas of flow.

CMC Response: CMC commits to inspecting the Times Mine Bulkhead to document conditions, including any increases in seepage or the development of any concentrated areas of flow on a weekly basis during operations, until DRMS has reviewed and approved the new bulkhead evaluation based on the results of the proposed pumping test, which may include different recommendations than those included in the Deere & Ault Consultants evaluation of the Times Mine Bulkhead submitted on May 17, 2019.

- 5) The operator's response to Item no. 1(g) states the operator has discussed the potential for concrete degradation of the Times Mine Bulkhead with Deere & Ault and prefer to let them

address the need to sample the water quality on a quarterly basis to evaluate the potential for concrete degradation of the bulkhead.

Please be advised, until the Division has reviewed and approved the new engineer bulkhead evaluation based on the results of the proposed pumping test, and including different recommendations than those included in the evaluation submitted to the Division on May 17, 2019, the operator must commit to monitoring water quality in the Times Mine on a quarterly basis (for the sampling parameters approved in AM-01) to evaluate potential concrete degradation of the bulkhead, and submitting these results to the Division in the quarterly groundwater monitoring report.

CMC Response: CMC commits to monitoring water quality in the Times Mine on a quarterly basis (for the sampling parameters approved in Revision No. AM-01) to evaluate potential concrete degradation of the Times Mine Bulkhead, and to submitting these results to the DRMS in the quarterly groundwater monitoring reports. Once the DRMS has reviewed and approved the new bulkhead evaluation based on the results of the proposed pumping test, which may include different recommendations than those included in the Deere & Ault Consultants evaluation of the Times Mine Bulkhead submitted on May 17, 2019.

CMC's representatives and consultants have been reviewing the answers to the remaining items in your Adequacy Review No. 5, and those will be forwarded to you as soon as they complete this process.

Sincerely,

Mark A. Steen

Colorado Milling Company, LLC