



July 27, 2020

Amy Eschberger
Environmental Protection Specialist
Michael Cunningham
Senior Environmental Protection Specialist
Colorado Division of Reclamation, Mining and Safety

Subject: Timing of Amendment required by Condition #2 for the former Schwartzwalder Mine Site, Golden Colorado

Dear Amy and Michael,

As requested in your inspection report dated July 7, 2020, CLL is providing the required estimated timeline for submitting the Amendment Application required by SO-1 within 30 days (by 8/6/20).

Colorado Legacy Land, LLC (CLL) is currently conducting important environmental monitoring (i.e. quarterly surface water and groundwater monitoring, mine pool elevation and chemistry, in-situ treatment including a mine pool tracer test with two tracers, and a pilot bioreactor and wetland study) at the Site. The results of the ongoing monitoring programs will form the basis of an Amendment Application that is required by DRMS in Condition No. 2 of the SO-1 approval, which we anticipate will be submitted in 2021.

As you have seen and been routinely inspecting, since taking over the Site in 2018, CLL has been actively pursuing the reclamation and closure of the Site in the following ways:

- CLL began excavating known contaminated alluvial soils from the Ralston Creek Valley, and this has continued in 2019 and 2020. Because this is a labor-intensive process that requires transloading to move materials underground and frequent radiological surveys of the excavation areas, it has been a laborious process, but we anticipate finishing this work in 2020.
- In 2Q 2019, CLL began a pilot bioreactor and wetland study to evaluate the biological treatment effectiveness for Site constituents of concern.
- In 2Q 2019, CLL began collecting additional flow data from Ralston Creek to refine our understanding of mass loading from the Site.
- In 4Q 2019, CLL successfully dewatered the mine pool to a level of 246 feet below the Steve Adit that allowed for the planned seasonal shut down of the water treatment plant (WTP), where it remained shut down until April 18, 2020.
- CLL has installed a deeper 60hp pump in the Jeffrey Air Shaft and plans to dewater the mine pool further during the operating season in 2020, and thereby enable an over winter shut down for 6 months (anticipated November 2020 to May 2021). We will monitor the recharge response from this seasonal pumping and shut down periods.
- In 1Q 2020, CLL completed the in-situ injection treatment of the mine pool that included two tracers; CLL is currently monitoring the effect of this in situ treatment on the chemistry of the mine pool and the mixing and dewatering of the tracers as we dewater and treat the mine water during 2020.



- CLL is also currently installing the North Waste Rock Pile diversion channel which is expected to eliminate any potential runoff seepage into the North Waste Rock Pile.

It is expected these environmental reclamation, treatment, and monitoring programs will continue through 2020, and the data analysis of the effects of these actions will occur beginning in 1Q 2021. As this analysis is necessary to the submittal of the Amendment Application, CLL intends to submit the Amendment Application with the relevant data in 3Q 2021.

If you have any questions on this estimated timeline, please do not hesitate to ask.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim M. Harrington". The signature is fluid and cursive, with a large initial "J" and a stylized "H".

Jim Harrington, Managing Director

COLORADO LEGACY LAND

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cc:

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