



The Union Milling Contractors

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VIA E-MAIL

October 8, 2020

Mr. Dustin Zapala
Colorado Division of Reclamation Mining and Safety
Environmental Specialist
101 South Third Street -Suite 301
Grand Junction, Colorado 81501
Dustin.zapala@state.co.us

**RE: Technical Revision 05 - Movement and Consolidation of Historically Tailings
Union Milling Company
13815 Highway 24
Lake County, Colorado
80461**

Dear Dustin,

Please find attached TR-05 for your consideration and approval to move acid producing tailings located between the existing mill building and the tailings storage facility (TSF). The tasks outlined (see attached report) are represent the first step in placing them in the TSF per our permit requirement. The second step will be reprocessing them in the facility and pump them into the TSF.

The Mill address is:
13815 Highway 24
Lake County, Colorado 80461

Work will commence upon approval with an anticipated completion date on or before December 1, 2020. Upon approval, a technical revision processing fee for a 112d-1 permit of \$1,006 will be submitted to the Division.

Sincerely,

A handwritten signature in black ink, appearing to read "George M.L. Robinson", is written over a light gray rectangular background.

George M.L. Robinson
Authorized Representative

Attachment
Technical Revision 5
cc: Cc Nick Michael

October 8, 2020

**M-1990-057-TECHNICAL REVISION 05
PHASE 1 MOVING OF HISTORIC TAILS TO TAILINGS STORAGE FACILITY**

LOCATION

**LEADVILLE MILL
13815 HIGHWAY 24
LEADVILLE, LAKE COUNTY, COLORADO, 80461**

CONTACT

MILL CONTACT

Mr. Steve Craig-MILL MANAGER -303.877-9701

scraig@unionmilling.com

TECHNICAL CONTACT

MR. GARY SLIFKA -OPERATIONS MANAGER-719-293-3417

gslifka@unionmilling.com

SUMMARY

- Estimated Acid Generating Tail Volume: 1,100 yd³,
- Estimated cut to create a lined pad is estimated to be 4,500 ft². approximately 15 feet, stacked at a 30-degree angle of repose,
- One-way trip is approximately 1,750 feet.
- Proposed start Date, October 19, 2020.
- Estimated End Date, October 23, 2020.
- Site activities will be conducted during daylight hours,
- Relocated tailings will be hauled on existing mill roads (See Figure 1),
- Acid generating tails have been assayed and suitable for milling and economically characterized,
- No change in bonding is required.
- Activities will be completed within the existing permitted and disturbed areas,
- No topsoil will be required to be salvaged,

COMMITMENTS

- Site activities will be under the supervision and direction of the mill manager-Mr. Steve Craig -303.877-9701 scraig@unionmilling.com
- Activities will comply with the approved mill permit M-1990-057 regulatory requirements and commitments,
- The work will be performed by a qualified (MSHA certified) contractor, who will also, provide the required equipment. Equipment will include a front-end loader and truck.
- Relocated tailings will be placed on a pad (approximately 4,500ft²) that is lined,
- The liner will be equal to or greater than 7mil thick,
- The liner will be held in place with boulders, wattles or used tires,
- Relocated tails will be temporarily covered with visqueen and stabilized with used tires, prior to mill processing,
- Erosion will be controlled using the cover, and where necessary, wattles will be installed,
- Surface water runoff from the tailings stockpiled will be directed to the Tailings Storage Facility (TSF) retention ponds,
- When mill is commissioned. the historic tails will be processed, pumped, and disposed in the TSF
- The visqueen cover will be wasted and disposed in an approved landfill,
- The pad liner will be recycled or disposed in an approved landfill,

