



COLORADO

Parks and Wildlife

Department of Natural Resources

Southeast Region, Area 14
4255 Sinton Road
Colorado Springs, CO 80907
P 719.227.5200 | F 719.227.5223

August 13, 2021

Elliott Russell
Environmental Protection Specialist
Division of Reclamation, Mining and Safety
1313 Sherman St. Room 215
Denver, CO. 80203

Re: Mineral Mountain Project - File No. M2014-045, Mineral Mountain Gold, LLC
Amendment Application (AM-1)

Dear Mr. Russell,

Colorado Parks and Wildlife (CPW) is in receipt of the above referenced permit application and is familiar with the site located at or near Section 12, Township 15S, Range 70W, 6th Principal Meridian in Teller County. CPW staff offers the following comments for your consideration.

The storage of concentrated chemicals and the potential for spills or leaks poses a significant risk to wildlife at the site. If wildlife ingests the chemicals in concentrated form there are serious wildlife health concerns. Aquatic species are also at risk of exposure if spills of the concentrated chemical or run off from the tailings enter the groundwater or aquatic habitats at levels that are harmful to aquatic wildlife. CPW recommends that concentrated chemicals being stored on site that are potentially harmful to wildlife be contained within a secondary container to prevent any accidental exposure or spills. We also recommend that the froth floatation circuit be enclosed, if it isn't currently, to prevent access by wildlife to prevent exposure or ingestion of the chemical mixture.

Regarding the tailings pile, it is unclear what levels of xanthate are present or if there are limitations on the amount of the chemical that can be disposed of in the manner currently used by the mine operator. We recommend to have a liner under the mine tailings for containment of toxic chemicals to prevent any contamination of ground or surface water. At a minimum there should be some form of containment of the tailings as well as periodic testing



to verify that the levels of chemicals or other toxic materials in the tailings are not contaminating run off or pose a risk to terrestrial and aquatic wildlife.

In addition to the concerns with the tailings pile and potential chemical exposure CPW suggests care be taken during mining to avoid excess erosion or disturbance of more land than necessary to accomplish the project. An erosion control plan is recommended for the waste rock area and mine tailings.

We also suggest the area be reasonably reclaimed following mining. We recommend reusing the original top soil that is removed from the surface by placing it back in its original location after mining is completed. Once the original top soil is in place, we recommend planting the disturbed areas with native vegetation that matches the native vegetation already present in the surrounding area.

CPW recommends the development and implementation of a noxious weed control plan for the site. It is recommended that all disturbed soils in the area be monitored for noxious weeds and noxious weeds should be actively controlled until native plant revegetation and reclamation is achieved. It is recommended that all areas disturbed by the development be revegetated with native plant species.

If fill material will be used in the project, CPW recommends using a native fill material that would be conducive to growing native vegetation. Non-native vegetation can out-compete native vegetation and thus degrade valuable wildlife habitat.

Thank you for the opportunity to comment on this permit application. If you have any questions or require additional information please contact Assistant Area Wildlife Manager Tim Kroening at 719-227-5281 or via e-mail tim.kroening@state.co.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cody Wigner', with a stylized flourish at the end.

Cody Wigner
Area Wildlife Manager

Cc: Tim Kroening AAWM
SE Regional File
Area 14 File