From: **Jerry Wright** <jwantero@me.com>
Date: Wed, Aug 25, 2021 at 2:22 PM
Subject: Leadville Mill M1990057 Union Milling Company LLC
To: <drms_info@state.co.us>
Cc: <smudge@co.lake.co.us>, <kmarcella@co.lake.co.us>, <jfiedler@co.lake.co.us>, <dnickum@tu.org>, Rick Helmick <helmick@gobrainstorm.net>

To: Colorado Division of Reclamation, Mining & Safety
Re: Leadville Mill M1990057
Union Milling Company LLC

Cc:
Sarah Mudge
Lake County Board of Commissioners

Kayla Marcella
Lake County Board of Commissioners

Jeff Fiedler
Lake County Board of Commissioners

David Nickum
Executive Director
Colorado Trout Unlimited

Rick Helmick
Vice President
Collegiate Peaks Chapter
Trout Unlimited

I am sending this letter concerning the operation application for the Leadville Mill, Leadville Colorado, by Union Milling Company LLC of Littleton Colorado.
This mill is located within California Gulch, an area known for gold and silver extraction and for a notorious Environmental Protection Agency Superfund Site-which provided a noxious mix of metals and acid pollution flowing into the Arkansas River. After millions of dollars and years of remediation to stabilize the source pollutants, the Arkansas River responded by creating the longest continuous Gold Medal fishery in Colorado. We don't want to go back to the way things were.

The application includes the use of vat leaching, incorporating sodium cyanide, an extremely toxic material. In addition to the vat leaching, the applicants wish to expand the permit area, expand the tailings facility and increase operating capacity from 200 tons/day to 400 tons/day. This process, as stated by the applicant, would require 1600 lbs of sodium cyanide per day or 24 tons of sodium cyanide per month even with recycling the sodium cyanide in the system. The applicant mentions neutralizing the cyanide as part of the process but it is unclear in the application which chemicals stored on site would be used for neutralization and whether an sufficient amounts would be on site in case of an emergency. The output of vat leaching is ounces of gold and tons of cyanide contaminated tailings stored in lined open tailings ponds.

The applicants state this is a closed system – that is, nothing escapes from the process loop. Any engineered process requires the designer to make assumptions about performance. These assumptions, albeit generally conservative and based on engineering principle, are in fact assumptions: assumed tailings-pond liner performance over time, assumed tailings embankment performance, assumed maximum rainfall entering the system, assumed diversion is sufficient size to handle runoff and not flood the tailings pond, assumed high pressure pumps and piping performance, assumed proper operation and maintenance. There is no such thing as a perfectly closed loop. It is true we all make assumptions to go forward with our day-to-day lives, but can we afford a breach in the cyanide vat leaching operations to spill into the Arkansas River? Can we risk the impact on the health and safety of the mill's neighbors, fish kill, aquatic invertebrates diversity damaged, flora and fauna impacts and fishing tourism economic impact. We don't want to go back to the way things were.

Sincerely,

Jerry Wright
Geologist

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