

August 26, 2021

Steve Craig
Union Milling Company, LLC
P.O. Box 620490
Littleton, CO 80162



1313 Sherman Street, Room 215
Denver, CO 80203

RE: Leadville Mill, Permit No. M-1990-057, Objection to CN-01 Application

Mr. Craig:

On August 25, 2021 the Division of Reclamation, Mining and Safety (Division) received an objection to your conversion application (CN-01) from Jerry Wright. The objection is attached to this letter.

Please provide your response, to the jurisdictional issues presented in the objection, to the Division by September 24, 2021.

If you require additional information, or have questions or concerns, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dustin Czapla', with a long horizontal flourish extending to the right.

Dustin Czapla
Environmental Protection Specialist
Division of Reclamation, Mining and Safety
Phone: (303) 866-3567, ext. 8188



DRMS Comment OR Objection Intake Tool



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

By submitting this form, you are providing a comment or objection to the public record of a permitting action currently under review by the Division of Reclamation, Mining and Safety.

CONTACT INFORMATION

Date of Comment or Objection

08/25/2021

*** Indicates a Required Field**

Comment or Objection *

- ☐ Objection
- ☐ Support
- ☒ General Comment
- ☐ Agency Comment

Contact Type *

- ☒ Individual
- ☐ Group
- ☐ Agency
- ☐ Attorney

Please select the appropriate option above to identify who you represent.

Your First Name *

Jerry

Your Last Name *

Wright

Your Address *

12587 CR 261K

Your Address 2

Your City *

Nathrop

Your State

CO

Your Zip Code *

Maximum of 10 digits. (Example) 80202

81236

Email Address *

Enter a valid email address in this field to receive a confirmation e-mail.

jwantero@me.com

Your Phone Number *

Used only to follow up.

3038880201

Extension**Alternate Phone Number**

Used only to follow up.

Alternate Phone Extension**Connection to Operation ***

Select all that apply

- ☐ Land Owner of affected land
- ☐ Mineral Owner
- ☐ Adjacent Land Owner
- ☐ Government Agency

- ☐ Structure Owner within 200' of affected land
- ☐ Nearby Resident
- ☒ Concerned Citizen
- ☐ Other

DESCRIPTION OF COMMENT OR OBJECTION

(Please be as specific as possible)

Comment/Objection Narrative *

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
12587 CR261K
Nathron CO 81236

Permit Number *

Enter valid letter and then numbers, for example M122112211 or C123456789.

M1990057

Permitting Action Type

Amendment

Select revision type or leave blank if comment pertains to a new permit application or NOI

Permitting Action Sequence *

Review

Permit Type

milling

County *

Lake

Enter one county only

Site Name

Leadvill Mill

Permittee/Operator Name

Union Milling Company LLC

ADDITIONAL INFORMATION

Are there supporting photos, maps, or documents you wish to upload? *

☐ Yes ☒ No

By submitting this form electronically you agree to receive any/all follow up correspondence from the Division of Reclamation, Mining, and Safety at the email address you have provided.