

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 Reed Dils. 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*

Contact Type *

- ☒ Individual
☐ Group
☐ Agency
☐ Attorney

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

Your First Name *

Reed

Your Last Name *

Dils

Your Address *

29940 CR 353E

Your Address 2

Your City *

Buena Vista

Your State

CO

Your Zip Code *

Maximum of 10 digits. (Example) 80202

81211

Email Address *

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

karendils4@gmail.com

Your Phone Number *

Used only to follow up.

7193958949

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 *

First, I'm wondering if this comment period should be extended. Many of us just downstream are just now hearing about this, even our mine reclamation person for National Trout Unlimited hasn't had time to delve into it.

Should this not be extended, Union must use the proposed geosynthetic clay liner (GCL) only as a secondary liner and not a primary liner. Given the proximity to other water sources and the downstream Arkansas River, a GCL should be overlain by an impermeable plastic HDPE or chemically resistant liner. GCLs can crack under the right conditions and over time, and this is not a chance we want to take in this watershed. There have been other devastating leaks of sodium cyanide into rivers. The Arkansas is a Gold Medal River and we don't want that to happen. Too much economic and recreational activity depend on it. I was here during the bad days where few fish lived due to pollution from Leadville mines.

The Union Mill, if done properly, has the potential to receive tailings and waste from other areas of the State to re-process them. This would help improve the waterways where the tailings are being pulled from, while also yielding a more-benign tailings product with the metals stripped out of it.

However, without more information and more time, I would be opposed to this use of sodium cyanide at this point, especially if the extra precautions mentioned above are not taken.

Permit Number *

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

M1990057

Permitting Action Type

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

Permit Type**County ***

Lake

Enter one county only

Site Name**Permittee/Operator Name**

Union Milling

Comment or Objection *

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

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.