



February 24, 2023

RE: Gold Hill Mill Conversion Application #M1994117

Colorado Department of Reclamation, Mining, and Safety,

Trout Unlimited is pleased to submit comments on Colorado Mining Company's recently completed conversion application for permit #M1994117 at the Gold Hill Mill. The Boulder Flycasters and St. Vrain Anglers chapters of Trout Unlimited are local watershed groups that are directly involved with water quality concerns in both the Boulder Creek and St. Vrain watersheds, including Left Hand Creek. As long-time watershed stakeholders representing our combined 1,200+ members, please consider our comments as they relate to water quality concerns with the Gold Hill Mill application.

Storage Concerns

- The tailings storage facility has been operating since 1970 with improvements in the 1980s and 90's. What improvements are planned to ensure tailings facility is up to 2023 standards? Surely, we cannot expect that 20+ year old liners beneath the facility are still in adequate condition.
- Times/Winona Water storage – Is the company confident that putting surface water into an underground working would not further contaminate the water by introducing it to potential pyrite, metals, and other contaminants that could be weathered from vein structure in underground workings? There is mention of a collar and casing. Is the company intending to put water into a cased well in the mine?

Water Right and Operational Concerns

- Given the limited perennial water resources in the area, how pertinent is it to pull water from Left Hand Creek for milling operations? What water right does the mill possess (85CW117 decree)? Will the mill operate at all times of the year or only when water rights are available from this limited resource?
- Regarding the water pipeline, has company investigated the feasibility of installation of pipeline given bedrock constraints commonly found in this area?
- Does the TSF also have a geosynthetic clay liner or bentonite subliner beneath the HDPE as a backup if HDPE is breached (I see on 100/372 that this was part of the as-built...has GCL been investigated for integrity since 1998 as those will crack over time)? Most TSFs typically have some sort of clay sub-liner. Also, are there toe drains or decants incorporated into the TSF to capture contaminated water?

Reclamation Plan

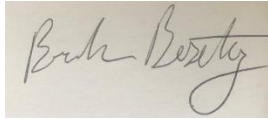
- TSF and Storage yard had previously mentioned incorporation of limestone layer into reclamation plans but do not identify that line item in cost estimate. Costs are grossly underestimated given 2023 values based on recently completed projects. Limestone at 15 tons/acre for a total of 30 tons (2 acre footprint) at \$165/ton would be \$4,950. Fertilizer should also be incorporated at 2000#/acre for a total of \$3,400. Contractor costs for incorporation of material would be \$13,000 in addition to erosion controls as silt fence, wattles or biodegradable mats at \$6,000. Additional excavator time at \$350/hr for 40 hours would be \$14,000 for a total additional cost of \$41,350. At a MINIMUM this should be added into the budget for reclamation of TSF and storage yard. Company should consider at least 15% contingency for all reclamation costs to be added as well given inflation and uncertainties during reclamation. At this point reclamation plan is inadequate with regards to costs.
- What is intended fate of existing topsoil pile referenced? Should be used in reclamation plan if viable.

Additional questions

- What units are GW results listed in? mg/L, ug/L?

Thank you for considering our comments and requests in your application process. We look forward to your responses.

Sincerely,



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