

January 3, 2024

Left Hand Canyon Residents  
8350 Left Hand Canyon  
Jamestown, CO 80455

**RE: Gold Mill Hill, M-1994-117**  
**Designated Mining Operation Conversion Application**  
**Further Information**

Colorado Milling Company thanks you for your comments with regards to the Gold Hill Mill's Designated Mining Operation conversion application. The conversion updates the Gold Hill Mill state reclamation to be inline with modern regulations and rules without expansion of the operations. Below is a list of concerns brought to Colorado Milling Company's attention by yourself and other parties, and Colorado Milling Company's answers.

Feel free to distribute this letter to any concerned citizens in the Gold Hill community.

*1. The old waterline should be removed before the new one is installed.*

Agreed! CMC will remove the old waterline as part of new waterline installation. Conducting installation and removal in one step will minimize activity and equipment presence in Lick Skillet Gulch.

*2. Will the waterline exacerbate flood challenges in Left Hand Canyon? Is a diesel pump necessary?*

Pumps, generators, and other larger equipment will be located outside of the 500-yr floodplain for safety. The only equipment in the floodplain and close to the creek will be the water pipe itself. This pipe will be laid on the ground instead of burial to minimize land disturbance due to the pipe and to ease maintenance access. A diesel fueled generator is required to power the pump; it will be enclosed in CONEX container to contain noise. Pumping will only occur during the irrigation season.

*How will Left Hand Creek diversions be monitored?*

Diversions of water according to the decreed water right will be tracked by a totalizing flow meter located in the pump house. Water volume pumped will be recorded at least weekly during pumping and reported to Left Hand Ditch Company as required.

*What happens if Left Hand Creek dries up or reduces in flows?*

Gold Hill Mill is entitled to 20 shares of the Left Hand Creek flow according to the water right decree. As these are shares of the creek water, they are dependent on the flow in the creek. If Gold Mill Hill is not legally or physically able to divert water from Left Hand Creek, it will not.

*Will water be returned to Left Hand Creek? What discharges will come from the mill?*

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*How will reagents be stored, transported, and handled?*

All reagents will be stored according to manufacturer specifications and MSDS guidance. The Emergency Response Plan contained within the CDRMS permit lays out chemical and operational specific controls in detail. Transport of reagents to and from the mill will be via licensed supplier only. Suppliers will follow CDOT, Boulder County, and OSHA requirements for safe material transport. Reagent deliveries will be minimized by the mill inherently to keep costs down. They are not anticipated to take place more than 2 times per month. Sunshine Canyon Road is a public road, open to all citizens of Boulder County for transport. This includes necessary mill chemicals. All appropriate signage and documentation regarding chemicals stored at the mill will be maintained in accordance with MSHA requirements.

*Are operations changing, expanding, or growing as part of this DMO? Will offsite mines start up? Will offsite waste dumps be processed?*

The DMO conversion application does not authorize the expansion of the Gold Hill Mill in any way. 100% of the affected area within the conversion application was approved for operation in Amendment 01 in 2019.

The DMO conversion will incorporate into the operation additional levels of environmental protection in accordance with Colorado law. The DMO conversion is the next step in a long train of efforts by CMC to clean up problems and issues caused by previous mill operators. CMC realizes that the history of the GHM has been frustrating and problematic for area residents and regulators. Since the departure of Mount Royal Ventures in 2015, CMC has been working diligently to straighten the mill permit and operations out.

The DMO conversion does not authorize the startup of any other mines. Mill disturbance extents local operations are specifically authorized and limited by the conservation easement in place with Boulder County.

Processing of material from sites in the region is a possibility, but Colorado Milling Company is not planning on processing this material in the near future. Such activity would require separate approvals and permits for each waste dump targeted for reclamation. For the time being, the DMO conversion application establishes certain minimum sampling and reporting requirements for any material brought to the Gold Hill Mill to be processed. CMC would gladly be a participant in these activities as waste dump processing is a cost-effective method of waste dump reclamation but will not pursue such activities without proper approval from CDRMS, Boulder County, and other agencies.

*What is the water like in the Times-Wynona Mine? Will it pollute offsite? Is it acid-mine water?*

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1980s. That last pumped in Left Hand Creek water is still in the Times-Wynona Mine. Currently, water levels in the Times-Wynona are limited by the installed bulkhead. CMC has permitted with CDRMS a new bulkhead for installation in the Times-Wynona Mine to allow for fuller use of it as a water storage facility. However, this new bulkhead has yet to be built as CMC is not ready to pump additional water into the Times-Wynona Mine.

The Times-Wynona Mine is separated from the Town of Gold Hill geologically by the Hoosier Reef and the low-permeability, low-porosity nature of the Boulder Creek granodiorite host rock. Detailed explanations of the area geology and ground water hydrology can be found in the revised and updated DMR application, specifically in Exhibit B.

The minerals present in the Times-Wynona workings have long been completely oxidized by contact with air and water during the Times-Wynona's initial use as a water storage system. No new workings or mineralogy has been developed in the intervening years that would be source of sulfides or other acid generating compounds.

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A full list of contacts to be made in the event of an emergency at the Mill is included in the Emergency Response Plan. This includes CDRMS, Boulder County, and CDPHE contacts.

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*The Gold Hill Mill is going to be another disaster like the Captain Jack Mine spill!*

The Captain Jack Mine discharge in 2018 is fundamentally different from activity at the Gold Hill Mill. The discharge of acid-mine water from the Captain Jack Mine in 2018 is not possible at the Gold Hill Mill. A number of differences between the two operations and sites are:

- The Gold Hill Mill is not a pre-law mine in a sulfide-heavy mineral district that historically discharged to local water. No water is discharged from the Gold Hill Mill.
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Please feel free to contact my office with any further questions on Gold Hill Mill.

Regards,

A handwritten signature in blue ink, appearing to read 'Ben Langenfeld', with a stylized flourish at the end.

Ben Langenfeld, P.E.  
Lewicki & Associates, PLLC  
(720) 842-5321, ex. 1  
[benl@lewicki.biz](mailto:benl@lewicki.biz)

January 3, 2024

Amy Fortunato  
4891 Lickskillet Rd  
Jamestown, CO 80455

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Lewicki & Associates, PLLC  
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January 4, 2024

John Daspit  
8600 Lefthand Canyon Drive  
Jamestown, CO 80455

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*Won't the Gold Hill Mill just be another spill, like the Captain Jack a few years ago?*

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Pine Brook Water District  
Rober de Haas, Manager  
1903 Linden Drive  
Boulder, CO 80304

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It should be noted that the Pine Brook commissioned a study of Gold Hill Mill by Morrison Geotechnical Solutions that states, with regards to risk to Four Mile Creek Drainage water quality:

"Though permitting of the mine and mill may be viewed as a significant risk for the operator, this risk is generally viewed to have limited effect on water quality in the Four Mile Creek Drainage watershed. However, on-going site monitoring, site safety, and proper closure/reclamation for a permitted operation with an active operator is significantly improved over that of an abandoned operation. As such, it may be in Pine Brook's best interest for the site to be properly permitted, operated, and reclaimed. Based on a likelihood of permitting risks of "Likely" combined with an impact of "Minor" to degradation of water quality in the Four Mile Creek Drainage watershed, this risk is considered Low to Medium."

-PRELIMINARY REVIEW AND RISK ASSESSMENT  
CASH MINE & GOLD HILL MILL, BOULDER COUNTY,  
COLORADO, pg. 27

Colorado Milling Company is pursuing the appropriate permits to operate and eventually reclaim the Gold Hill Mill, just as recommend by Pine Brooks own consultant. Converting the CDRMS permit to a DMO will lead to better environmental controls and oversight of milling operations, further reducing the already "Low" environmental risk identified by Morrison Geotechnical Solutions.

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Gold Hill Fire Protection District  
1011 Main – Gold Hill  
Boulder, CO 80302

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*What happens if Left Hand Creek dries up or reduces in flows? Will firefighting water be interfered with?*

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Gold Hill Mill recognizes the need for firefighting water in the area and maintains its long standing offer to the Gold Hill Fire Protection District that water in the Times-Wynona Mine is available for fire-fighting uses.

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Agreed! CMC will remove the old waterline as part of new waterline installation. Conducting installation and removal in one step will minimize activity and equipment presence in Lick Skillet Gulch.

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The DMO conversion does not authorize the startup of any other mines.

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No decant system is needed within the tailings pond. It contains tailings permanently and allows for water evaporation. No discharge of water takes place from the tailings pond.

*Full details of the tailings pond design and installation can be found within the DMO conversion, under Exhibits C & U. The Gold Hill Mill is going to be another disaster like the Captain Jack Mine spill!*

The Captain Jack Mine discharge in 2018 is fundamentally different from activity at the Gold Hill Mill. The discharge of acid-mine water from the Captain Jack Mine in 2018 is not possible at the Gold Hill Mill. A number of differences between the two operations and sites are:

- The Gold Hill Mill is not a pre-law mine in a sulfide-heavy mineral district that historically discharged to local water. No water is discharged from the Gold Hill Mill.
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Please feel free to contact my office with any further questions on Gold Hill Mill.

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[benl@lewicki.biz](mailto:benl@lewicki.biz)

January 3, 2024

Brendan Besetzny  
Trout Unlimited  
PO Box 541  
Boulder, CO 80306

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January 3, 2024

Left Hand Ditch Company  
c/o Clark G. Edwards  
921 Walnut St., Suite 200  
Boulder, CO 80302

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In accordance with the water right in place for the Gold Hill Mill to divert water from Left Hand Creek, ownership ceased irrigation activities with said water when the water right was procured. If irrigation has taken place on the same land since then, it is outside the authority or control of Colorado Milling Company.

*How will Left Hand Creek diversions be monitored?*

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8398 Lefthand Canyon Drive  
Jamestown, CO 80455

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1740 Four Mile Canyon Drive  
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No decant system is needed within the tailings pond. It contains tailings permanently and allows for water evaporation. No discharge of water takes place from the tailings pond.

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The Captain Jack Mine discharge in 2018 is fundamentally different from activity at the Gold Hill Mill. The discharge of acid-mine water from the Captain Jack Mine in 2018 is not possible at the Gold Hill Mill. A number of differences between the two operations and sites are:

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- As the Gold Hill Mill does not discharge in any manner, there is no water discharge that could carry contaminants to a watershed like in the Captain Jack situation. If, for any reason, water within the Times Wynona Mine could not be pumped into the mill, it would simply sit in the Times-Wynona Mine behind an approved bulkhead and not be discharged to any watershed. The quality of that water, sitting in a container and not discharging, would be irrelevant. Said water would pose no risk to Left Hand Creek.
- It is the reclamation plan at Gold Hill Mill to consume all the water with the Times-Wynona Mine and leave it empty at the end of operations. This will also prevent there being any discharge or spill related risks.

Please feel free to contact my office with any further questions on Gold Hill Mill.

Regards,



Ben Langenfeld, P.E.  
Lewicki & Associates, PLLC  
(720) 842-5321, ex. 1  
[benl@lewicki.biz](mailto:benl@lewicki.biz)

May 1, 2023

Deb Hummel  
The Watershed Center  
6800 Nimbus Road  
Longmont, CO 80503

**RE: Gold Mill Hill, M-1994-117**  
**Designated Mining Operation Conversion Application**  
**Further Information**

Colorado Milling Company thanks you for your comments with regards to the Gold Hill Mill's Designated Mining Operation conversion application. The conversion updates the Gold Hill Mill state reclamation to be inline with modern regulations and rules without expansion of the operations. ***Revised exhibits and documents have been submitted to CDRMS throughout the adequacy review process to address numerous technical items. Please see those exhibits and documents for details.***

Below is a list of concerns brought to Colorado Milling Company's attention by yourself and other parties, and Colorado Milling Company's answers.

*The old waterline should be removed before the new one is installed.*

Agreed! CMC will remove the old waterline as part of new waterline installation. Conducting installation and removal in one step will minimize activity and equipment presence in Lick Skillet Gulch.

*Will the waterline exacerbate flood challenges in Left Hand Canyon? Is a diesel pump necessary?*

Pumps, generators, and other larger equipment will be located outside of the 500-yr floodplain for safety. The only equipment in the floodplain and close to the creek will be the water pipe itself. This pipe will be laid on the ground instead of burial to minimize land disturbance due to the pipe and to ease maintenance access. A diesel fueled generator is required to power the pump; it will be enclosed in CONEX container to contain noise. Pumping will only occur during the irrigation season.

*How will Left Hand Creek diversions be monitored?*

Diversions of water according to the decreed water right will be tracked by a totalizing flow meter located in the pump house. Water volume pumped will be recorded at least weekly during pumping and reported to Left Hand Ditch Company as required.

*What happens if Left Hand Creek dries up or reduces in flows?*

Gold Hill Mill is entitled to 20 shares of the Left Hand Creek flow according to the water right decree. As these are shares of the creek water, they are dependent on the flow in the creek. If Gold Mill Hill is not legally or physically able to divert water from Left Hand Creek, it will not.

*Will water be returned to Left Hand Creek? What discharges will come from the mill?*

The mill is a zero-discharge facility. 100% of water pumped to the mill for processing will be used in processing. No water will be returned to Left Hand Creek. Water in the tailings pond will evaporate; there will be no discharge from the tailings pond.

*How will reagents be stored, transported, and handled?*

All reagents will be stored according to manufacturer specifications and MSDS guidance. The Emergency Response Plan contained within the CDRMS permit lays out chemical and operational specific controls in detail. Transport of reagents to and from the mill will be via licensed supplier only. Suppliers will follow CDOT, Boulder County, and OSHA requirements for safe material transport. Reagent deliveries will be minimized by the mill inherently to keep costs down. They are not anticipated to take place more than 2 times per month. Sunshine Canyon Road is a public road, open to all citizens of Boulder County for transport. This includes necessary mill chemicals. All appropriate signage and documentation regarding chemicals stored at the mill will be maintained in accordance with MSHA requirements.

*Are operations changing, expanding, or growing as part of this DMO? Will offsite mines start up?  
Will offsite waste dumps be processed?*

The DMO conversion application does not authorize the expansion of the Gold Hill Mill in any way. 100% of the affected area within the conversion application was approved for operation in Amendment 01 in 2019.

The DMO conversion will incorporate into the operation additional levels of environmental protection in accordance with Colorado law. The DMO conversion is the next step in a long train of efforts by CMC to clean up problems and issues caused by previous mill operators. CMC realizes that the history of the GHM has been frustrating and problematic for area residents and regulators. Since the departure of Mount Royal Ventures in 2015, CMC has been working diligently to straighten the mill permit and operations out.

The DMO conversion does not authorize the startup of any other mines. Mill disturbance extents local operations are specifically authorized and limited by the conservation easement in place with Boulder County.

Processing of material from sites in the region is a possibility, but Colorado Milling Company is not planning on processing this material in the near future. Such activity would require separate approvals and permits for each waste dump targeted for reclamation. For the time being, the DMO conversion application establishes certain minimum sampling and reporting requirements for any material brought to the Gold Hill Mill to be processed. CMC would gladly be a participant in these activities as waste dump processing is a cost-effective method of waste dump reclamation but will not pursue such activities without proper approval from CDRMS, Boulder County, and other agencies.

*What is the water like in the Times-Wynona Mine? Will it pollute offsite? Is it acid-mine water?*



The Times-Wynona Mine has functioned as water storage for the Gold Hill Mill for over 40 years. The water currently in the Times-Wynona has been within the mine since pumping ceased in the 1980s. That last pumped in Left Hand Creek water is still in the Times-Wynona Mine. Currently, water levels in the Times-Wynona are limited by the installed bulkhead. CMC has permitted with CDRMS a new bulkhead for installation in the Times-Wynona Mine to allow for fuller use of it as a water storage facility. However, this new bulkhead has yet to be built as CMC is not ready to pump additional water into the Times-Wynona Mine.

The Times-Wynona Mine is separated from the Town of Gold Hill geologically by the Hoosier Reef and the low-permeability, low-porosity nature of the Boulder Creek granodiorite host rock. Detailed explanations of the area geology and ground water hydrology can be found in the revised and updated DMR application, specifically in Exhibit B.

The minerals present in the Times-Wynona workings have long been completely oxidized by contact with air and water during the Times-Wynona's initial use as a water storage system. No new workings or mineralogy has been developed in the intervening years that would be source of sulfides or other acid generating compounds.

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*Is there enough monitoring at the mill?*

Groundwater monitoring at the Gold Hill Mill has been conducted for many years and will continue throughout the mill's operating life. Five different monitoring wells are sampled on a quarterly basis and the results are provided to CDRMS each quarter. No new groundwater risks have been identified or proposed as part of the DMO conversion. A thorough discussion of all monitoring activities at the mill can be found in Exhibits C & U of the DMO conversion application.

Surface water monitoring at Gold Hill Mill is also not necessary. The mill is not discharging water to the surface, does not introduce man-made materials to any waterways, and does not exist within a gulch or similar drainage channel. All surface disturbance drains internally and does not discharge. Undisturbed storm water runoff is routed around mill activities to prevent it from mixing with disturbed area water.

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Regards,

A handwritten signature in blue ink, appearing to read 'Ben Langenfeld', with a stylized, cursive script.

Ben Langenfeld, P.E.  
Lewicki & Associates, PLLC  
(720) 842-5321, ex. 1  
[benl@lewicki.biz](mailto:benl@lewicki.biz)

January 3, 2024

Maya MacHamer  
Boulder Watershed Collective  
1740 Fourmile Canyon Drive  
Boulder, CO 80302

**RE: Gold Mill Hill, M-1994-117**  
**Designated Mining Operation Conversion Application**  
**Further Information**

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*How will the Times-Wynona Mine bulkhead be installed?*

A full design for the Times-Wynona Mine bulkhead was approved in Technical Revision 11 and can be found in the updated DMO conversion document for records.

Please feel free to contact my office with any further questions on Gold Hill Mill.

Regards,



Ben Langenfeld, P.E.  
Lewicki & Associates, PLLC  
(720) 842-5321, ex. 1  
[benl@lewicki.biz](mailto:benl@lewicki.biz)



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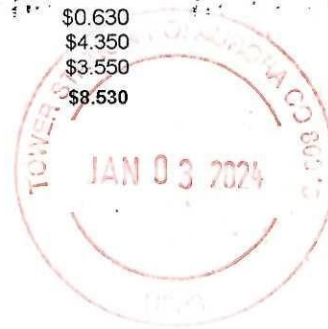
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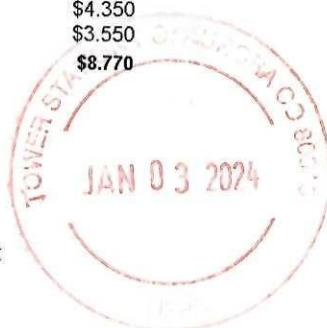
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1011 Main - Gold Hill  
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CLARK G. EDWARDS  
Left Hand Ditch Company  
921 WALNUT ST STE 200  
BOULDER CO 80302-5173

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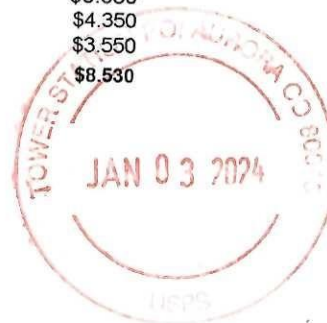
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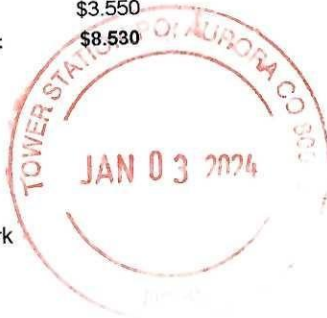
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DEB HUMMEL  
The Watershed Center  
6800 NIMBUS RD  
LONGMONT CO 80503-8707

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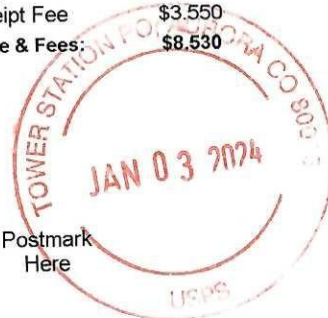
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**ARTICLE ADDRESS TO:**

MAYA MACHAMER  
Boulder Watershed Collective  
1740 FOURMILE CANYON DR  
BOULDER CO 80302-9831

Postmark  
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U.S. Postal Service  
Certified Mail Receipt

**OUTBOUND TRACKING NUMBER**  
9414 7118 9956 2635 0226 88

**RETURN RECEIPT TRACKING NUMBER**  
9490 9118 9956 2635 0226 37

**FEES**

Postage per piece	\$0.630
Certified Fee	\$4.350
Return Receipt Fee	\$3.550
<b>Total Postage &amp; Fees:</b>	<b>\$8.530</b>

**ARTICLE ADDRESS TO:**

LEFT HAND CANYON RESIDENTS  
8350 LEFTHAND CANYON DR  
JAMESTOWN CO 80455-9725

Postmark  
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