

Ruth Goltzer Objection Letter
April 2, 2024

I object to CJK's request for a revised permit because the project presents extraordinary dangers to humans, wildlife, the environment and risks the health and safety of thousands of people and the economies of Lake County and our southern neighbors along the entire Arkansas River.

The application is ambiguous, vague and lacks specificity in all areas. It raises more questions than it answers.

I ask DRMS to consider the following questions and to require detailed answers from CJK on each aspect of their proposal:

1. What is the detailed plan to oversee the use of cyanide? How will it be handled from "cradle to grave"? How is the mixture produced? Who does it? How are they trained? How are they protected? What is the plan for disposal at closure? Will it be handled according to the Resource Conservation and Recovery Act (RCRA) requirements? If not, why not?
A complete Cyanide Management Plan must be in hand and reviewed before project approval.

2. What is the detailed plan for waste management and hazardous waste removal? What proposed actions are, or should be, covered by the RCRA? Are these explained in detail in the application?

3. What is the detailed plan for long-term monitoring of the mill site, including the FTD, after closure, beyond planting trees? Will CJK be responsible for the cost of monitoring through perpetuity?

4. What happened to the Filtered Tailings Deposit (FTD) double HDPE liner and leak protection system as outlined in last year's application #2? CJK must provide to DRMS the soil sampling methods and lab reports used to declare this change as acceptable and safe. How will materials from possible other sites, or even other areas within the Penn Mine Dump, be assessed for toxicity?

5. Are CJK's reclamation bond cost numbers correctly calculated? Do they reflect inflation 7-10 years down the road? If CJK goes bankrupt or leaves town, will the bond cover clean up, removal of hazardous waste and ensure future monitoring of the site?

6. What permits are needed and what is their current status: are they applied for, in process, finalized? Applicable permits (aside from the Lake County CUP) should be obtained before DRMS project approval.

7. There are residential dwellings and wells in the immediate vicinity of the mill, including the many homes in the Lake Fork Mobile Home Community just downhill of the site. What is the

Emergency Response plan to alert the surrounding community, including Lake County agencies and officials, of an accident, spill or other mishap? Will the plan be shared prior to the start of mill operation? Will it be presented in Spanish?

8. Will waste piles CJK come from other areas of Leadville's historic mining district, beyond the Penn Mine Group Dump? Has the State Historic Preservation Office been contacted about this project?

9. Will CJK promote transport of mine waste piles from outside Lake County to the mill for processing, ever?

10. How will the EPA's new regulations (as of January 2024) regarding lead content in the soil affect CJK's application?

Specifically to DRMS: how will you monitor CJK's operation, if approved? Will you do site visits at least every month to ensure CJK compliance? What remedies are available for non-compliance? What will you do to help if there is a "mishap" with the cyanide process or the FTD leaks?

The effects of any such event would be catastrophic

There is NO guarantee against an accident and the tailings pile will leak eventually.

What are we left with then?

Please REJECT this application!

Thank you for your consideration.