



**Lake County Conservation District**

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April 3, 2024

Mr. Lucas West  
Division of Reclamation and Mining Safety  
1515 Sherman Street, Room 215  
Denver, Colorado 80203

Re: Application of Union Milling Company, LLC  
Leadville Mill –File No. M-1990-057 Permit  
Conversion Application (CN-3)  
Conversion to 112(d) Designated Mining Regular Operations Permit

Dear Mr. Lucas West,

After reviewing the Union Milling Co. (CJK) application, the Lake County Conservation District (LCCD) would like to submit the following concerns and questions about the proposed project's potential impacts on our area's natural resources:

- The application indicates that groundwater wells upstream and downstream would be monitored and sampled quarterly. We request that *during the first year of operation that those wells be monitored and sampled monthly*, and then quarterly after that. We request that those monitoring reports be provided to the LCCD.
- Please provide assurance that California Gulch water will be monitored quarterly as well, and provide those monitoring reports to LCCD.
- Provide semi-annual safety reports to LCCD.
- Ensure that there are sufficient water resources available for the milling process, as Lake County faces growing residential pressure and use.
- We recommend that reclamation of bare ground take place, and that the local NRCS office is consulted to ensure that proper native seed mixes are used in the process. This will help address possible noxious weed concerns. In addition, provide a plan for roadside noxious weed management.

In addition, LCCD would like to request that CJK present at one of our monthly/annual meetings. Please contact us to schedule this presentation.

Sincerely,

Board of Supervisors  
Lake County Conservation District