



December 2, 2024

Nick Michael  
Union Milling Company, LLC  
P.O. Box 620490  
Littleton, CO 80162-0490

**RE: Leadville Mill, Permit No. M-1990-057  
2<sup>nd</sup> & 3<sup>rd</sup> Quarter 2024 Surface Water and Groundwater Monitoring Report  
Adequacy Review**

Dear Mr. Michael,

The Division of Reclamation, Mining and Safety (the Division) has reviewed the Groundwater and Surface Water Sampling Reports for the 2<sup>nd</sup> and 3<sup>rd</sup> Quarter of 2024. The reports were received on November 19<sup>th</sup>, 2024. During review of the material submitted, the Division determined that the following issue(s) of concern shall be adequately addressed:

- 1) Section 4.0 Water Monitoring Reporting of the approved Water Monitoring Plan state that second quarter data is to be reported by August 1<sup>st</sup> and third quarter data is to be reported by November 1<sup>st</sup>. Please provide an explanation as to why the data was not provided on the dates as prescribed in the approved Water Monitoring Plan.
- 2) The approved Water Monitoring Plan call for duplicate, field blank, and trip blank samples to be taken as part of the quality control process. No duplicate or blank samples were collected during either quarter. Please provide a rationale as to why no QC samples were collected, and a thorough explication as to how the data can be validated to provide defensible results in the absence of such samples.
- 3) Sampling at wells LM-MW-3 and LM-MW-2 were not sampled according to the low flow procedures described in the approve Water Monitoring Plan. Please explain what procedure was used and why the approved procedure was not implemented.
- 4) In the approved Water Monitoring Plan specific equipment was approved to be used, specifically for pumping, however in the field sheets provided, it appears that different styles of pumps were utilized on the June 28, 2024 sampling event than the September 30, 2024 sampling event. Furthermore, within the June 28, 2024 sampling event different types of pumps were used between the different sample locations. Please provide an explanation as to why the different types of pumps were utilized.



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- 5) In addition to Item 4 of this review, for the September 30, 2024 sampling event please clarify what style of pump was utilized for purging each of the wells. For example, in addition to the 12V pump listed, additional information was provided that is unclear.
- 6) In the data submitted via Email, a summary spreadsheet was included with most of the pertinent information, however a comparison to the applicable standards for both surface and groundwater was not. For each of the submitted sample events, and all future events, please provide a table comparing the analytical results to the applicable standards. For surface waters, where the standard is a calculation of Table Value Standards, please perform the calculation, referencing the method used, and displaying the resulting standard on the table.

Please submit your responses to the above listed issues by Monday December 16, 2024 in order to allow the Division sufficient time for review. The Division will continue to review your application and will contact you if additional information is needed. Please note that the current Decision Date for your application is set at Friday February 7, 2025. The Decision Date is already set at the maximum allowable time under Rule 1.4.1(9). If you require additional time to address the above listed issues, an Extension Request beyond 365 days from the date of completeness will need to be made to and approved by the Mined Land Reclamation Board.

If you require additional information or have questions or concerns, please contact me. Direct contact can be made at the Division's Grand Junction Field Office, by phone at 303-919-2997 or by email at [lucas.west@state.co.us](mailto:lucas.west@state.co.us).

Sincerely,



**Lucas West**

Environmental Protection Specialist  
Division of Reclamation, Mining and Safety

cc: Travis Marshall, DRMS  
Todd Jess, DRMS  
Patrick Lennberg, DRMS