

**From:** [Colleen Williams](#)  
**To:** [Cunningham, Michael](#)  
**Subject:** Gold Hill Minerals Bueno Mine Exploration  
**Date:** Friday, May 04, 2012 2:43:09 PM  
**Attachments:** [Letter to DRMS - May 4, 2012.pdf](#)

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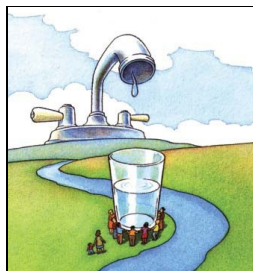
Dear Mr. Cunningham,

The James Creek Watershed Initiative would like to provide comments and voice concerns regarding the application for Gold Hill Minerals Bueno Mine Exploration permit. I am attaching a letter to this email for your review.

Sincerely,

Colleen Williams

Colleen Williams, Director  
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# The James Creek WATERSHED INITIATIVE

P. O. Box 110

Jamestown CO 80455

*"Caring for the land and water"*

May 4, 2012

Dear Mr. Cunningham:

The James Creek Watershed Initiative would like to provide comments and voice concerns regarding the application for Gold Hill Minerals Bueno Mine Exploration permit. The James Creek Watershed Initiative (JCWI) is a local citizens-based watershed group formed in 1996 to assist the Town of Jamestown with source water protection. We later developed into a non-profit organization whose mission is to protect and restore the waters of James Creek and the surrounding forest. We have been active partners in watershed protection and restoration and work closely with Julie Annear on mine land reclamation in the James and Lefthand watersheds in Boulder County.

We are concerned with reopening mines in the James and Lefthand watershed because we have spent the last decade working with area stakeholders to improve the water quality of the Lefthand watershed, which includes James, Little James, and Left Hand Creeks. Historic mining activity has resulted in heavy metal and other mining-related contamination scattered throughout the Left Hand Creek watershed. Currently, Little James Creek is listed as impaired due to elevated levels of copper and iron on the 2010 303(d) list; whereas, segments of Left Hand Creek are impaired due to elevated levels of copper, zinc, arsenic, and low pH.

Our watershed partners include: EPA, CDPHE, DRMS, Boulder County, Town of Jamestown, Left Hand Water District, Lefthand Watershed Oversight Group, Wildlands Restoration Volunteers, and others. Multiple efforts have been underway to improve the quality of the Lefthand watershed. A list of abandoned mine sites and the status of their reclamation is included in the table below.

Mining Site	Lead Party	Type of Cleanup	Reclamation Status
Bueno Mountain	EPA	Emergency Response	Completed
Burlington Mine Site	Honeywell International, Inc.	Voluntary Cleanup	Completed
Roadside Tailings	EPA	Emergency Response	Completed
Streamside Tailings	EPA	Emergency Response	Completed
Slide Mine	Steen Properties	Voluntary Cleanup	Completed
Evening Star Mine	EPA	Emergency Response	Completed
Argo Mine	Boulder County	Brownfield	Completed
Golden Age Mine	USFS	AML Reclamation	Completed
Captain Jack Mine & Mill Site	CDPHE	Superfund	In process
Fair Day Mine	USFS	AML Reclamation	Completed
John Jay Mine	DRMS & USFS	AML Reclamation	Completed
Porphyry Waste Rock	JCWI	319 & DRMS Grant	In process
Jamestown Town Park	Town of Jamestown	Brownfield	Completed
Castle Gulch (Lily Mine)	USFS	AML Reclamation	Completed

We also worked on restoration projects in the watersheds to reduce the amount of sediment entering James and Lefthand Creek. These include the James Creek Restoration Project and the Lefthand OHV Area Restoration Project, both taking 5 years to complete each project and both funded with a CDPHE 319 grant.

We have reviewed the permit and have attended the presentation by Gold Hill Minerals at the Jamestown Town Hall last evening. There are a few discrepancies between what they told the community and what is on their permit, and we have the following specific concerns:

- The application states: "This is proposed as a two phase exploration operation. The first phase will be to conduct surface and subsurface exploration activities on our patented mining claims and underground. During the second phase, activity on the USFS unpatented mining claims will occur once the USFS approves the POO." Gold Hill Minerals did not inform the community at this meeting about their second phase, which could have direct impact on the James Creek Source Water Protection area within a half-mile upstream from the town's domestic water intake on James Creek.
- The application states: "The source of non-potable water for dust control and surface core hole drilling operations will be from Little James Creek. Potable water for human use will be brought on-site daily from local domestic water supplies. " Gold Hill Minerals told the community that they would be bringing water up from Boulder in trucks, not using Little James Creek water. We are concerned that the information being provided to the community is different than what the permit states.

If the mining exploration yields good results and active mining permits are obtained to develop this resource, the Town of Jamestown is at risk of impacts to their only source of drinking water, James Creek. In February 2011, the Town completed a Source Water Protection Plan which identified mining operations as a potential source of contamination to James Creek. Also, during 2011, the Town revised their Watershed District Ordinance, which allows the Town to protect the watershed five miles upstream from their intake. The Town, its community, and partners are serious about protecting and improving the waters of James and Little James Creek.

In 2000, Boulder County supported the Town's drinking water supply by closing County Road 102J to recreational vehicle use. County Road 102J runs parallel and in close proximity to James Creek. Years of off-highway vehicular recreation use resulted in erosion and sediment loading into James Creek. The Town was unable to meet the State's Safe Drinking Water Act standards for turbidity. After the road closure, JCWI restored the riparian corridor in a project called the James Creek Restoration Project. This closure is a concern because Gold Hill Minerals has 16 shares of Lefthand Ditch water and water rights to James Creek, and may want to re-open CR 102J. Historically, the Bueno Mine had a headgate on James Creek two miles upstream of the Town's intake. Water was piped via gravity to the Bueno Mine site. Access to rebuild and maintain this pipeline would require re-opening County Road 102J, doing extensive grading and roadwork to rebuild an old road that is reclaimed, and thus creating the sediment problem that we mitigated.

We are also concerned with the potential for spills from vehicles used in their mining activity as they travel in the James and Little James corridor. There already was a small spill from one of their vehicles on the roadway and although it did not require a hazardous materials cleanup, it is a concern for water quality. Even a small amount of a petroleum product can contaminate the creek.

We find the bond they posted inadequate. Restoration work in the watershed has cost us as taxpayers more than the \$2000 you required. Please consider requiring a larger bond to cover what it would actually cost to reclaim the Bueno Mine site.

Maintaining a high water quality of James Creek is our first priority. We are reluctant to embrace the return of mining activity in our area. We ask that you closely monitor the mining activity to ensure that all requirements are met. We will continue to monitor the water quality of James and Little James Creek as we have been doing since 1996.

Sincerely,

Colleen Williams, Director  
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