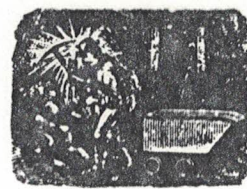




Broken Handle Mining Corporation



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Comments by E. R. Lewandowski

A. The researchers for Mined Land Reclamation who compiled the report did an admirable job for the time frame they were given. They and Mr. Shelton undoubtedly would like to publish as accurate a survey as possible, as mentioned in your letter. To aid in this endeavor, may I offer our services to review the 113 entries made in the report for Clear Creek County? I estimate that a 30-day review by us may result in a report with considerably greater accuracy.

B. Evidently I missed the definition of the term "inactive." For example, are mines operated for only one month of the year "inactive"?

C. Complementing comment #2 above, the table "Mine Sites with Significant Safety or Environmental Problems in Clear Creek County" should be dated on each page. In this flowing economy, with base and precious metal prices roller-coastering, numerous additions or subtractions could be made annually to the list depending on current price trends.

D. The report itself needs to be proof read carefully to eliminate the large number of typographical errors which are present. For example, "Pelican" has only one "l".

E. Three specific comments follow:

(1) On the first page of the "CLEAR CREEK COUNTY" section, penultimate sentence, the report states, "Mines of all types can be found in the county and extreme hazards occur at all of them." I suggest that not all of the mines have extreme hazards. I would recommend the use of "many" of the mines in place of "all."

(2) Under the "Argentine" section of the report, the second paragraph describes the driving of the A-P Tunnel as a typical mining ruse. The fact is, it was promoted (by the famous promoter W. W. "Brick" Pomeroy) as a transcontinental railroad tunnel. I have a copy of the sales brochure in my possession, and also cite the following references:



Prospecting and Development Work
" - - - Since 1955 "



- (a) Denver, South Park and Pacific by M. C. Poor, 1949, pp 73, 74 (copies enclosed)
- (b) Georgetown Courier, February 1891
- (c) Empire and the Berthoud Pass, by Louise C. Harrison, 1964, pp 374-375
- (d) many, many more if you want them

(3) Map Index No. 47, "KELSO SADDLE" 0597-30188-01, is in error. First of all, it belongs to the Broken Handle Mining Corporation and is worked every year, hence is not "inactive." Our records, including photographs, indicate we have been working that adit for the past 15 consecutive years. Your investigators should have noticed the fresh dump, new timbered portal this year, or at least the new "NO TRESPASSING" signs. The U.S. Forest Service, with whom we work very closely, can be checked to verify our activities. A photo, typical of our extensive number of record photos, is enclosed for your information.

Secondly, I question how "dangerous" it is. However, a close review of your definition of "dangerous features" does reveal the possibility of it falling in that category.

Thirdly, you list the total acreage disturbed as 0.2 acre. Since the mine dump, including the shack, occupies a space 30 feet by 30 feet, I compute that as $900 \div 43,560 = 0.02$ acre.

F. In your section on "HISTORY OF MINING," inclusion of some of the following facts may update your report:

- (1) An infusion of \$30-\$50 million of private capital into local mining ventures in the period 1979-1982 has stimulated the reopening of many small operations.
- (2) There are probably at least 30 small operations presently underway in Clear Creek County.
- (3) There are now 10-12 mills in the area capable of handling local ore.

G. In your section on "EVALUATION OF INACTIVE MINES," I suggest the second paragraph be revised to include "Evidence of such visitation and trespassing by hikers, motorcyclists, * * * souvenir hunters and thieves was abundant." Most idle mines are private property. Unauthorized removal of property therefrom is theft, pure and simple!!