



COLORADO

**Division of Reclamation,
Mining and Safety**

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

February 3, 2015

Mr. Timm Comer
Cripple Creek & Victor Gold Mining Company
100 N. 3rd Street
P. O. Box 191
Victor, CO 80860

**Re: Cripple Creek & Victor Mining, Co., Cresson Project, M-1980-244;
Follow-up Review Comments for Quality Assurance Monitoring & Test Results Final
Report for Squaw Gulch VLF Pregnant Solution Storage Area Project**

Dear Mr. Comer:

The Division of Reclamation, Mining and Safety (Division) has completed the review of CC&V's January 15, 2015 responses to the Division's December 10, 2014 comments on the Quality Assurance Monitoring and Test Results for the Squaw Gulch VLF Pregnant Solution Storage Area Project. The original comment number sequence has been retained for tracking purposes. Comments 3.d.ii and 8.b require additional responses:

1. General Comments:
 - a. Paper vs. electronic copies of subject report – the response is adequate.
 - b. Record of Construction Drawings – the response is adequate.
2. Drawings – the response is adequate.
3. Appendix A, Record of Construction Drawings.
 - a. Record Drawing 2 of 9 – the response is adequate.
 - b. Record Drawing 8 of 9 – the response is adequate.
 - c. Record Drawing 9 of 9 – the response is adequate.
 - d. Omitted or Misplaced Record Drawings – Sumps and HVSCS Riser base plates:
 - i. Three PSSA sumps – the response is adequate.
 - ii. Riser Base Plates and Top of Upper Geosynthetics – the response requires clarification: On page 4, midway through the response, is the following statement "Revised Record Drawings No. 5 and 7 are presented in Appendix A of this document". There is no Drawing No. 5 in Appendix A. Should this in fact be Drawing No. 4?
4. Appendix J, Secondary Geomembrane Installation Observations – the response is adequate.



5. Appendix K, Primary Geomembrane Installation Observations – the response is adequate.
6. Appendix O, Underground Working Observations – the response is adequate.
7. Appendix Q, Closure Drain Installation Summary:
 - a. The Division concurs a record drawing is essential for the closure drains... The response is adequate.
 - b. The seven “Squaw Gulch Valley Leach Field Closure Drain As-Built”... The response is adequate.
 - c. Appendix Q.1, Summary of Closure Drain Concrete Test Results – the response is adequate.
 - d. Appendix Q.5, Closure Drain As-built Drawings – the response is adequate.
8. Appendix R, Underdrain Pond:
 - a. The discrepancies between Appendices R.1 and R.2... The response is adequate.
 - b. Why concrete not meeting specifications was used for underdrain pond construction... The response is partially adequate. Amec’s response states “The Underdrain Ponds are easily accessible and are regularly inspected; part of the inspection includes a visual assessment of the concrete. Should the concrete begin showing signs of failure it will be repaired or replaced.” The Division will require a minimum quarterly inspection of the underdrain ponds, except when water is stored in either one or both ponds inspections shall be monthly. Any problem shall be reported to the Division within 72 hours of the inspection. A summary of the inspections shall be submitted to the Division on an annual basis. The Division suggests the annual underdrain report be submitted either with the annual Leak Detection System Data report or the 112d-3 Annual Report. Please provide a written commitment to the proposed monitoring program and annual report, including which annual report CC&V prefers to amend with the underdrain ponds inspection report.

If you have any questions or need further information, please contact me at (303)866-3567 x8169.

Sincerely,



Timothy A. Cazier, P.E.
Environmental Protection Specialist

cc: Tom Kaldenbach, DRMS
Amy Eschberger, DRMS
Elliott Russell, DRMS
DRMS file