



COLORADO

**Division of Reclamation,
Mining and Safety**

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

October 26, 2015

Mr. Jack Henris
Cripple Creek & Victor Gold Mining Company
100 N. Third Street
P.O. Box 191
Victor, CO 80860

**Re: Project, Permit No. M-1980-244;
Technical Revision (TR-76) Preliminary Adequacy Review**

Dear Mr. Henris:

On September 25, 2015 the Division of Reclamation, Mining and Safety received a request for a Technical Revision (TR-76) addressing the following:

Relocate two pipelines between the AGADR and the SGADR - one barren and one fresh water

The submittal was called complete for the purpose of filing on September 25, 2015. **The decision date for TR-76 is October 26, 2015.** Please be advised that if you are unable to satisfactorily address any concerns identified in this review before the decision date, **it will be your responsibility to request an extension of the review period.** If there are outstanding issues that have not been adequately addressed prior to the end of the review period, and no extension has been requested, the Division will deny this Technical Revision (TR).

The following comments are based on the Division's review of the TR-76 Request for TR:

1) Drawing D200:

- a. The Division was under the impression that the 14-inch diameter barren solution line would be double contained when crossing the unlined area between the SGVLF and the AGVLF. Section callout A/D200 appears to be off the liner area and the corresponding detail does not show double containment. Similarly, Detail B/D200 implies the pipe-in-pipe/sleeve design is only required "If Vehicle Access Is Required". Please provide clarification and revise Drawing D200 as appropriate.
- b. Will the proposed 10 to 12-inch diameter fresh water pipeline follow the same alignment as the barren pipeline?
- c. No detail is provided as to how the pipe-in-pipe/sleeve design is terminated (e.g., hole through a blind flange, etc.) to demonstrate how potential leakage would be

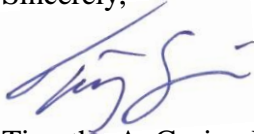


prevented from leaking out at the transition between double and single containment. Please provide an appropriate design detail and include a minimum length the double containment extends onto the lined area on both ends of the transition area.

- 2) Pipe demolition. Telephone conversations between CC&V and the Division indicated a possible oversight during the review of AM-10/MLE2 in 2012 that demolition costs for pipelines may not have been included in the Exhibit L submitted with AM-10 and subsequently as part of the biannual surety increase (SI-05) submitted to the Division in 2014. As a result of these conversations, it was suggested the biannual surety review due with the 2016 annual report be revised to include appropriate demolition costs. I have reviewed the 2014/SI-05 Tabs 18 (ArequaVLF) and 19 (SquawVLF) and found demolition costs for 30" pipe (6,900 ft in the AGVLF & 4,082 ft in the SGVLF) and 24" pipe (4,082 ft in the AGVLF & 12,422 ft in the SGVLF). Please confirm whether or not the listed pipe lengths and sizes include all surface pipe expected to be in place at the end of MLE2.
- 3) Reclamation cost estimate: The original TR-76 submittal did not include a demolition cost for the 14-inch diameter barren solution line. Based on telephone communications, CC&V provided a barren line demolition cost estimate of \$24.00 per foot on October 19, 2015 via email. Please confirm this cost includes the "sleeve" proposed for double containment.
- 4) Fresh water pipeline: Please confirm whether or not the fresh water line will be left in place upon final reclamation. If it is to remain, please indicate its final purpose.

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

ec: Wally Erickson, DRMS
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