



February 2, 2016

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DIVISION OF RECLAMATION
MINING AND SAFETY

Mr. Timothy A. Cazier, PE
Environmental Protection Specialist
Colorado Division of Reclamation Mining and Safety
1313 Sherman Street, Room 215
Denver, Colorado 80203

**RE: Cripple Creek & Victor Mining, Co. Cresson Project M-1980-244;
Additional Review Comments for Quality Assurance Monitoring & Test Results Final Report for
Squaw Gulch VLF Phase 1 (9,550 Bench to Completed Areas Outlined on Figure 2)**

Dear Mr. Cazier,

Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler) has prepared this letter on behalf of Cripple Creek & Victor Mining Company (CC&V) to discuss geomembrane approval, the record of construction report geomembrane boundary, and the barren solution pipeline. Only an electronic copy of this letter will be provided.

The Record of Construction (ROC) report submitted to DRMS in January 2016 does not include geomembrane Panels P1387 through P1392 or Panel P1419, however the 14-inch-diameter barren solution pipe crosses over two of these panels. These geomembrane panels were accepted for drain cover fill (DCF) placement on October 26, 2015 (approval located in ROC report Appendix J.7) and was also shown on the geomembrane acceptance map included with the weekly reports, week ending October 31, 2015 located in Appendix D of the ROC. Amec Foster Wheeler did not include these geomembrane panels in the ROC report because while drain cover fill material was placed over the panels, a buffer must remain to allow for 2016 construction and geomembrane tie-in thus not allowing the entire panel to be part of the ROC report.

There are two geomembrane panels where the 14-inch-diameter barren pipe is located, but the geomembrane below the pipe has been installed according to the Technical Specifications and under quality assurance supervision and provides dual containment for the barren pipe. Any barren solution will flow down gradient on geomembrane in the unlikely event that any leaks occur in the pipeline in this vicinity. The distance from the center of the barren pipe to the nearest edge of the temporary anchor trench is approximately 44 feet, the minimum required distance is 15 feet from the barren line to edge of geomembrane. Figure 1 shows the as-constructed location of the barren pipe tie-in. The magenta line is the pipe-in-pipe dual containment location which was approved with TR-76 and connects to the barren pipe (aqua line) on the geomembrane lined area certified in the ROC report. The black line is the barren pipeline connection and is located on the certified geomembrane of the Mill Platform Drainline Containment Area geomembrane and on the

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certified geomembrane of the Arequa Gulch VLF. At no point does the barren solution pipeline not have a form of dual containment.

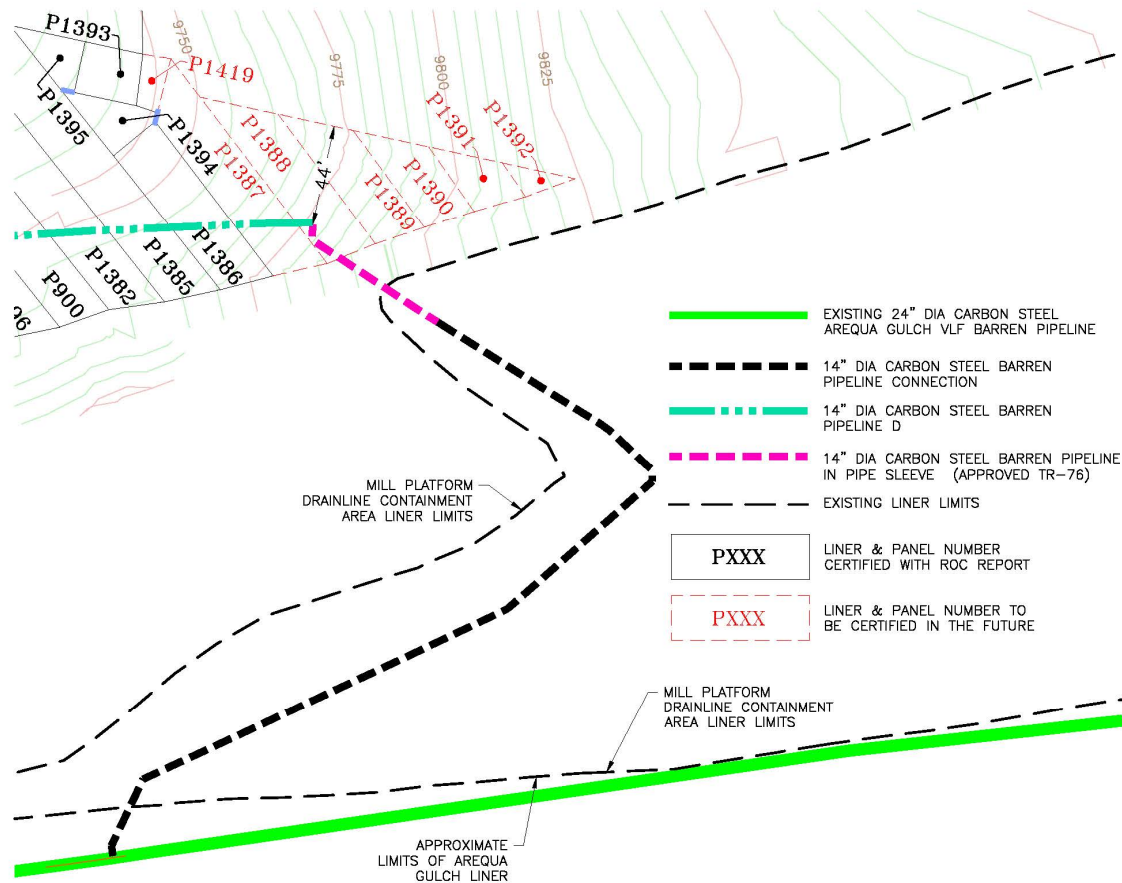


Figure 1 Barren Pipe Tie-In

The quality assurance geomembrane installation observation documentation for the discussed panels is located in Appendix J of the ROC report submitted in January 2016; the text is greyed out indicating it will be included in future record of construction reports.

Attached with this letter is an as-constructed figure of the 14-inch-diameter carbon steel barren pipeline, also known as Pipeline D, please see Figure 2 for pipe location.

Please do not hesitate to contact me at 303-975-2192 or Andrea.Meduna@amecfw.com with any questions.

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Sincerely,
Amec Foster Wheeler Environment & Infrastructure, Inc.



Andrea L. Meduna, PE
Project Manager/Certifying Engineer

Attachment:
Figure 2 Barren Solution Pipeline D As Constructed

cc: Mr. Ron Roberts, Project Manager, CC&V
Mr. Ron DiDonato, Project Superintendent, CC&V
Mr. Jeff Gaul, Project Superintendent, CC&V
Mr. Chris Hanks, Chief Environmental Coordinator, CC&V
Mr. Marc Tidquist, Sr. Environmental Coordinator, CC&V
Ms. Meghan Duck, Document Control, CC&V
Ms. Katie Holybee, Document Control, CC&V
Mr. Robert Redd, Project Resident, Amec Foster Wheeler

