



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources
1313 Sherman Street, Room 215
Denver, Colorado 80203

November 7, 2016

Jack Henris
Cripple Creek & Victor Gold Mining Company
100 North Third Street
Victor, CO 80860

RE: Second Adequacy Review; Cresson Project; Permit No. M-1980-244; TR-83

Dear Mr. Henris,

On November 3, 2016, the Division of Reclamation, Mining and Safety (Division or DRMS) received the Cripple Creek & Victor Gold Mining Company (CC&V) adequacy response for Technical Revision (TR-83) for the Cresson Project, File No. M-1980-244. The Division has reviewed the content of TR-83 and the November 3, 2016 adequacy responses and submits the following comments. Inadequate, incomplete, or responses that require additional clarification or information are listed as inadequate and are identified by the same adequacy item number. The Division's follow-up adequacy is in normal font. Additional adequacy item 8 follows the inadequacies.

6. *Response to Adequacy Item 6 is inadequate.*

Please provide a technical justification for not lining the approximately 1,200 feet of unlined haul road between the LOB and the SGVLF. Please explain how CC&V plans to prevent, control, and mitigate releases of designated chemicals on this section of unlined haul road.

7. *Response to Adequacy Item 7 is inadequate.*

Please provide the sampling and testing procedures for the meteoric water mobility test as discussed in the adequacy response.

The Division has observed that the haul road drainage collects a large amount of sediment. As proposed, the channel and EMP 008c, as well as the rock check dams discussed in TR-82, will likely need to be cleaned out occasionally. Please specify where cleaned-out sediment from the drainage channel and/or EMP 008c will be taken. If this sediment is taken to an unlined facility, please commit to sampling it to ensure it is not impacted by designated chemicals.

8. On September 15, 2016, the Division received the enclosed comment for Teller County regarding TR-83. Teller County has requested to be informed should an off-liner incident occur. Please provide the response to this request.


This concludes the Division's second adequacy review of this Technical Revision. This letter shall not be interpreted to mean that there are no other technical deficiencies in your request. Other issues may



arise as additional information is supplied. Please be advised TR-83 may be deemed inadequate, and the request may be denied on November 9, 2016, unless the above mentioned adequacy review items are addressed to the satisfaction of the Division. **If more time is needed to complete the reply, the Division can grant an extension to the decision date. This will be done upon receipt of a written waiver of the Applicant's right to a decision by November 9, 2016 and the request for additional time. This must be received no later than the deadline date.**

If you need additional information or have any questions, please contact me at the Division of Reclamation, Mining and Safety, 1313 Sherman Street, Room 215, Denver, CO 80203, by telephone at **303-866-3567 x8132**, or by email at elliott.russell@state.co.us.

Sincerely,



Elliott R. Russell
Environmental Protection Specialist

Enclosure: Teller County TR83 Comment Letter M1980244

CC: Wally Erickson; DRMS
Tim Cazier; DRMS
Meg Burt; CC&V
Cheyne Mann; CC&V
Erik Munroe; CC&V