



COLORADO

Division of Reclamation,  
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215  
Denver, CO 80203

April 7, 2017

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-89) Preliminary Adequacy Review, Part I**

Dear Mr. Henris:

On March 10, 2017 the Division of Reclamation, Mining and Safety received a request for a Technical Revision (TR-86) addressing the following:

*Remove High Grade Mill flotation concentrate from the circuit for transportation offsite*

The submittal was called complete for the purpose of filing on March 10, 2016. **The decision date for TR-89 is April 10, 2017.** 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 may deny this Technical Revision (TR).

The attached memorandum from Elliott Russell presents the Division's initial concerns for TR-89. Additional comments will be transmitted on Monday April 10, 2017.

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: Amy Eschberger, DRMS  
Elliott Russell, DRMS  
DRMS file  
Meg Burt, CC&V  
Tyler O'Donnell, CC&V





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### MEMORANDUM

**To:** Tim Cazier; DRMS

**From:** Elliott Russell; DRMS

**Date:** April 7, 2017

**Re:** **Technical Revision (TR-89) Adequacy Review; Cresson Project; DRMS File No. M-1980-244**

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1. On Page 3 of the Technical Revision submittal, the Operator proposes to remove the processes of agglomerating the High Grade Mill (HGM) tailings and placing unagglomerated HGM tailings on the Squaw Gulch Valley Leach Facility (SGVLF). The Operator evaluated the possible impacts on the SGVLF geotechnical stability. However, the Operator did not evaluate the impacts, if any, the unagglomerated HGM tailings would have on the chemical composition of the SGVLF. In addition, the Operator did not evaluate the impacts the unagglomerated HGM tailings would have on the closure plan and reclamation of the SGVLF. The Division is concerned the fines from unagglomerated HGM tailings will migrate to the bottom of the Pregnant Solution Storage Area and may create issues for the closure drains. Please provide information and demonstrate that unagglomerated HGM tailings will not have an impact on the chemical composition nor the closure plan for the SGVLF.
2. Process Flow Diagram 10-647-06 depicts two areas which have red revision clouds with no direction arrows. The first goes to the *Filter Area Sump Pump No. 1*, spurring off of the path from the *Concentrate Area Load Out Sump* to the *High PH Filtrate Recycle Tank*. The second goes from the *Neutral PH Filtrate Recycle Tank* and goes to the *High PH Filtrate Recycle Tank*. Please revise this diagram to accurately reflect the new flow path(s) and red revision cloud(s) or explain the empty revision clouds.
3. Drawing 20-647-004A is a drawing of Section B and is referencing 002b. However, there was no Drawing 002B in the TR-89 submittal. This is likely an error and should reference 002A because Drawing 20-647-002A contains locators for Section B. Please clarify.
4. The Division requests an additional cross-sectional drawing to transect the loadout area sump pump, loadout area, and haul truck area. This additional section would likely be identified as C and should be in the same orientation as A and B.
5. Please confirm if T.O.C. on Drawings 20-647-002A and 20-647-003A stands for Top of Concrete. Please discuss if the concrete pad for concentrate stockpile building and loadout area also includes the area where haul trucks will be loaded at. Drawings 20-647-002A shows this area as a dark shaded area.
6. The scale (1" = 100') on Drawing 20-647-001A is incorrect as submitted. Please submit an updated Drawing 20-647-001A with a corrected scale. Drawing 20-647-001A shows a good overview of the HGM, but at the map's current scale, it lacks the appropriate details necessary for a thorough review of the concentrate loadout area and HGM pad extension. Please submit an additional map with a larger scale that is appropriately zoomed in on the concentrate loadout area and HGM pad extension. This map should show the limits of the existing liner as well.

