



COLORADO

**Division of Reclamation,
Mining and Safety**

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

May 29, 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) Third Adequacy Review**

Dear Mr. Henris:

On June 9, 2017 the Division of Reclamation, Mining and Safety (Division) received your responses to our Second Adequacy Review (SAR) letter for Technical Revision (TR-89).

The following comments are based on the Division's review of CC&V's responses to the Division's SAR:

Part I The responses to the six issues identified in the April 7, 2017 PAR (Part I) are adequate.

General Comments.

- A) The High Grade Mill – previously adequate response.
- B) Additional flotation tanks - previously adequate response.
- C) List of other permits – previously adequate response.

Comments Specific to the Submittal.

- D) Concentrate Stockpile Clarification – The June 9, 2017 response is adequate.
- E) Hazardous Material Discussion: previously adequate response
- F) Secondary Containment for the Breezeway (p. 2, 6th paragraph) – The June 9, 2017 response is adequate.
- G) Pad Extension (p. 3, 2nd paragraph). Please provide the following:
 - i. A complete set of current specifications... The June 9, 2017 response is not adequate. The specifications provided have a “DRAFT” watermark and are not acceptable as they would be expected to change prior to construction. Review of DRAFT specifications by the Division would be pointless. Again, please provide a complete set of current final specifications intended for the pad extension signed by a professional engineer licensed in Colorado



- ii. Rationale for why three different slopes are proposed. The June 9, 2017 response is adequate.
- iii. Discussion on whether or not additional liner is required. Previously adequate response.

Drawings.

- H) Drawing 20-647-001A. Previously adequate response.
- I) Drawing 20-647-002A. Previously adequate response.

Nonagglomerated Tailings Strength Assessment and Stability Evaluation.

- J) The Technical Memorandum (TM) prepared by NewFields:
 - i. A realistic assessment of the worst case ratio of tailings to ore – The June 9, 2017 response is adequate.
 - ii. A written commitment to follow NewFields' recommendation in Section 4.0 – Previously adequate response.

Supplemental Strength Assessment and Stability Evaluation Technical Memorandum.

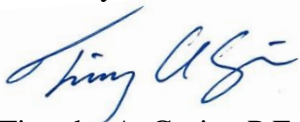
- K) The Technical Memorandum (TM) prepared by NewFields (dated March 8, 2017):
 - i. Revisions to achieve the required Factors of Safety and addressing the comments in Item L below. Previously adequate response.
 - ii. Requested specifications in Item G(i). The response is not adequate, see Item G(i) above.
- L) Slope stability analyses (Attachment A). Please revise the analyses to include the following:
 - i. Section A – previously adequate response,
 - ii. Section B – previously adequate response.

Additional Comments.

- M) Attachment 5, Drawing 20-647-84. The June 9, 2017 response is adequate.

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
Amy Eschberger, DRMS
Elliott Russell, DRMS
DRMS file
Meg Burt, CC&V