



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215
Denver, CO 80203

September 1, 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-92) Preliminary Adequacy Review**

Mr. Henris:

On July 31, 2017 the Division of Reclamation, Mining and Safety (DRMS) received a request for a Technical Revision (TR-92) addressing the following:

HGM to SGVLF Solution Line

The submittal was called complete for the purpose of filing on August 7, 2017 when the fee was officially received. **The decision date for TR-92 is September 6, 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 review consisted of comparing the application content with specific requirements of Rules 6.4, 7.3 and 7.4 of the Minerals Rules and Regulations of the Colorado Mined Land Reclamation Board for Hard Rock, Metal, and Designated Mining Operations. The following comments are based on the Division's review of the request for TR-90:

Comments Specific to the Submittal.

- A) Background (p. 1) – The text states the “chemistry of the solution is essentially the same as the solution circulating within the VLFs”. Additional text on p.2 indicates placing the proposed 4-inch HDPE line “on lined facility its entire route” eliminates “any potential impacts to the environment”. Furthermore, Attachment 2 shows two flatter sections of the proposed alignment (Approximately Station 3+50 to 4+00, and ~9+25 to 10+00). On April 12, 2012 a spill occurred in the vicinity of the perimeter safety berm overlying the anchor trench at the toe of the Phase V VLF. The spill occurred in an area where the edge of the VLF liner is relatively flat (as is the pipe conveying process solution). It was later determined the manganese precipitate in the pipe may have contributed to restricting the flow causing the leak.

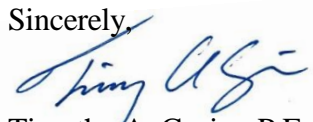


The extent of the liner was also implicated. This leak did have the potential for environmental impact as the spill went off liner. Please discuss how this proposed pipeline, seemingly similar to a situation that did have potential for environmental impact is “eliminated” in this proposed change.

- B) Modifications to the approved plan (p. 1) – Please clarify whether the proposed four inch HDPE pipeline is to be smooth or corrugated on the inside.
- C) Modifications to the approved plan (p. 2) – A statement is made to the effect that maintaining a similar solution application rate for the proposed infiltration gallery (as compared to the rest of the pad) so as to not adversely impact the stability of the pad. Please quantify the two application rates so the DRMS can is not required to assess a qualitative comparison.

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
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DRMS file
Meg Burt, CC&V
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