

May 2, 2018

Mr. Mike Schaffner  
Cripple Creek & Victor Gold Mining Company  
P.O. Box 191  
Victor, CO 80860

**Re: Project, Permit No. M-1980-244;  
Technical Revision (TR-97) Preliminary Adequacy Review**

Dear Mr. Schaffner:

On March 26, 2018 the Division of Reclamation, Mining and Safety (Division) received a request for a Technical Revision (TR-97) addressing the following:

*Grassy Valley Monitoring Well Installation*

The submittal was called complete for the purpose of filing on March 27, 2018. **The decision date for TR-97 has been extended to May 31, 2018.** 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 will deny this Technical Revision.

The following comments are based on the Division's review of the request for TR-97:

- 1) Figure 2: The plan on page 2 states "CC&V proposes to install a monitoring well within Grassy Valley to monitor groundwater quality downgradient of the ECOSA seep location." However, Figure 2 (Proposed ECOSA Monitoring) shows the monitoring well downgradient of the ECOSA Seep Accumulation Pond. Although the proposed location of GVMW-25 allows CC&V to monitor the ECOSA Seep Accumulation Pond, the Division is concerned the well will fail to monitor the 2017 Seep Location and therefore the installation of an additional monitoring well appears warranted. The location of this additional well might be more appropriate downgradient of the seep location, approximately 800 feet east-southeast of GVMW-25. Please demonstrate how the sole location of GVMW-25 is sufficient to demonstrate compliance with the Rules or commit to installing an additional monitoring well.
- 2) Figure 4: The plan on page 2 states "the monitoring wells will be drilled to bedrock", implying they will be screened in the alluvium. However, Figure 4 (GVMW-25 Cross Section) shows the monitoring well extending well into the Diatreme (Cripple Creek



Breccia) bedrock. Please explain this discrepancy and clarify what formation(s) will be screened. If the deeper completion depth is shown simply to make it easier to see on the figure, please include an inset figure using a larger scale to show the intent is to complete the well in the shallow alluvium/colluvium.

- 3) The proposed bond increase of \$1,896.50 for the additional well abandonment appears adequate. Assuming no significant changes to this TR as a result of responding to this adequacy letter and the Division approves TR-97, the current bond will be 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  
Justin Bills, CC&V