



Teller County Community Development Services

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May 8, 2018

Meg Burt
Senior Environmental Manager
Cripple Creek and Victor Gold Mining Company (CC&V)
Box 191, Victor, CO 80860

SUBJECT: Planning Review: Re. No Impact Technical Revision (Appendix A-Section 8.B) of Cripple Creek and Victor Gold Mining (CCV) Permit No. M-1980-244-Mine Development Plan (MDP); Cresson Project – VLF2 Liner Inspection TR#100

Dear Ms. Burt:

The Teller County Planning Department has completed its review of the Newmont Mining Corporation's (CC&V) Technical Revision TR#100 VLF2 Liner Inspection proposal.

1. Teller County understands that TR#100 proposes to conduct a liner integrity investigation in the immediate area around the December 16, 2017 Squaw Gulch Valley Leach Facility (VLF2) slough. This slough was discovered on Saturday, December 16, 2017 when a small internal portion of the VLF2 ore slope developed during loading. It is also our understanding that this liner incident posed no threat to life or property and that CC&V initiated an internal investigation.
2. It is also understood that the Division of Reclamation, Mining and Safety (DRMS) during a routine state wide inspection observed CC&V removing ore from the slough area and subsequently issued a 'Reason to Believe a Violation Exists' letter to CC&V on March 29, 2018. The DRMS letter outlined the requirement for CC&V to submit a TR outlining a process for how the VLF2 liner would be inspected and recertified. CC&Vs initial TR response was submitted on March 28, 2018 but subsequently withdrawn, as the proposed resistivity analysis included did not meet Newmont's safety requirements. TR#100 is a response to the DRMS request which outlines the new inspection and recertification plan.[developed by a third-party engineering firm – Newfield's]
3. The new plan involves three steps:
 - An inspection of the high volume solution collection pipes. A utility survey will be employed to locate the pipes and then compared to the as-built survey. Any change in pipe location may indicated a slide impact to the pipes and liner.

- Removal of ore from the DCF in the target area. Third party quality assurance and control will oversee this step.
 - Excavation of a grid of test pits to expose the geomembrane surface, focusing on the area where impact to the liner may have occurred. Once testing is complete, CC&V and a Newfield's certifying engineer will examine the condition of the liner.
4. CC&V will also monitor the liner daily for evidence of leaks during the entire testing period. All results of the testing and examination will be provided to DRMS. If any of the test results indicate a breach or damage to the liner, that portion of the liner will be exposed and repaired. Any repair made will be observed and certified by a NewFields certified engineer. A follow up Quality Assurance Monitoring Test Report will be submitted to DRMS for acceptance and recertification.

Teller County has no objections to TR-100 as written and appreciates the opportunity to comment subject to the **following conditions**:

- a) Please submit copies of the test results provided to DRMS and inform us as to whether the linear integrity was compromised. If compromised, please provide a copy of the repair schedule and locations to be repaired.
- b) If compromised, please provide a copy of any resultant Quality Assurance Monitoring Test Report.
- c) If there was no compromise of the Liner and backfilling of drain cover material occurs over the exposed liner please provide Teller County with a copy of the certified report summarizing the work.

If you have any questions, please contact me at (719) 686-5414 or email williamsd@co.teller.co.us.

Respectfully,



Dan Williams
The Teller County Planning Official

Cc: *Lynda Morgan, CDSO Director*
Camille Krochta, Planning Assistant
Tim Cazier, DRMS