



COLORADO

Division of Reclamation,  
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215  
Denver, CO 80203

June 6, 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-100) Second Adequacy Review**

Dear Mr. Schaffner:

On May 31, 2018 the Division of Reclamation, Mining and Safety (Division) received via email your responses to our May 21, 2018 preliminary adequacy review (PAR) letter for a Technical Revision (TR-100) addressing the VLF2 Liner Inspection.

**The decision date for TR-100 is June 11, 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 may deny this Technical Revision.

The following comments are based on the Division's review of the responses to our PAR:

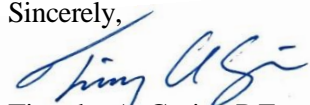
- 1) Monitoring results submittal schedule: The response was adequate.
- 2) Figure 2: Figure 2/50-ft offset. The response requires additional information and a commitment to a phased approval schedule:
  - a. As this is part of the public record, please provide rationale to address the change from 50 feet of liner exposure beyond the observable damage to a single panel.
  - b. Please provide clarification as to whether the single panel exposure beyond visible damage for liner integrity testing extends to both the horizontal (along the contour) and vertical (perpendicular to the contour) directions. If the criteria is to be different for the vertical extent, please clarify and provide rationale.
  - c. Pursuant to Rules 7.3.1(1) and Rule 7.4.2, please provide a construction schedule to include the general sequencing or phasing of the testing, reconstruction and recertification of the compromised area such that the Division can plan for optimum inspection timing to observe various phases or sequences of the process.
  - d. Provide in writing a commitment to submit a certification report stamped by a professional engineer registered in the state of Colorado to and obtain acceptance from the Division prior to placing ore in any area of the VLF2 requiring recertification as a result of the known sloughing area.



- i. The Division strongly recommends CC&V submit phased certification reports for each of the components of the liner system (undamaged liner certification; and repair work for: Soil Liner Fill, Geomembrane, Drain Cover Fill) as the certification by the Colorado Professional Engineer is completed. This approach should serve to streamline the process of Division acceptance and minimize potential rework if anomalies are encountered.
- 3) Criteria for undamaged liner: The response requires additional information and a commitment to a phased approval schedule. Similar to Comment 2d above and Rule 7.3.1(1) please revise the commitment in the last sentence of the PAR response to Comment 3 to the following: “No ore will be placed in this area until the integrity test proves the ~~geomembrane~~ liner system meets project technical specifications and has been reviewed and accepted by the Division.”
- 4) 9,750 Bench Seam Integrity Verification: The response is adequate with the understanding the certification report required by Comment 2d will include this bench seam and no ore placement will occur until the Division accepts the certification report.
- 5) 10,050 Level material: Some clarification to your response is needed. Based on your response, it appears nothing is to be done with this material until the VLF2 build out approaches the 10,050 level. The Division is concerned about potential movement causing liner damage in the interim. Please provide the following:
  - a. A schedule indicating the current plan for when this mill material will be removed,
  - b. A plan on how potential movement will be monitored in the interim, and
  - c. A commitment to monitor potential movement of the mill material placed at the 10,050 level.

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

cc: Wally Erickson, DRMS  
Michael Cunningham, DRMS  
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Russ Means, DRMS  
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