



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources
1313 Sherman Street, Room 215
Denver, Colorado 80203

August 3, 2018

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

RE: Cresson Project; Permit No. M-1980-244; Receipt of Demonstration of Compliance with WQCC's Regulation No. 41 – The Basic Standards for Ground Water; Additional Information Required

Mr. Schaffner:

The Division of Reclamation, Mining and Safety (Division or DRMS) has reviewed your response to the Division's Request for Demonstration of Compliance with WQCC Regulation No. 41 – The Basic Standards for Ground Water, received on June 22, 2017.

Your response includes an analysis of the available groundwater data for each of the six drainages at the Cresson Project, and a description of recent and historic mining activities that have occurred in each drainage. Your analysis is based on a total of four monitoring parameters, including Manganese, Sulfate, Zinc, and pH. However, the Division has approved Numeric Protection Levels (NPLs) for a total of 18 parameters for compliance groundwater monitoring wells at the site (see enclosed Table A).

Please provide a revised demonstration that, at a minimum, addresses all parameters with DRMS approved NPLs, and compares all available groundwater data to the most restrictive standards set forth in Tables 1 through 4 of WQCC's Regulation No. 41 – The Basic Standards for Ground Water.

Additionally, for drainages that pre-January 31, 1994 groundwater data is not available or is very limited, please provide a detailed discussion of any new or increased sources of groundwater contamination that has been initiated in the drainage since that date.

Please provide the requested information within 60 days, by **October 2, 2018**.

If you have any questions, you may contact me by telephone at 303-866-3567, ext. 8129, or by email at Amy.Eschberger@state.co.us.

Sincerely,

Amy Eschberger
Environmental Protection Specialist



Enclosure: Table A – DRMS Approved Numeric Protection Levels for Compliance Groundwater Monitoring Wells at the Cresson Project Compared with Most Restrictive Table Value Standards Set by CDPHE WQCC's Regulation No. 41 – The Basic Standards for Ground Water

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TABLE A

DRMS Permit No. M-1980-244; Cresson Project; Cripple Creek & Victor Gold Mining Company (112d-3)

DRMS Approved Numeric Protection Levels (NPLs) for Compliance Groundwater Monitoring Wells at the Cresson Project Compared with Most Restrictive Table Value Standards Set by CDPHE WQCC's Regulation No. 41 – The Basic Standards for Ground Water

Parameter	DRMS Approved NPL (mg/L)	Most Restrictive Table Value Standard (mg/L)
Aluminum	7.0*	5.0
Arsenic	0.009	0.01
Cadmium	0.004	0.005
Copper	0.008	0.2
Cyanide (WAD)	0.2	0.2
Fluoride	2.0	2.0
Iron	14.0*	0.3
Lead	0.03	0.05
Manganese	3.00* (8.1* for CRMW-3B-63; 1.0* for GVMW-8A; 0.2* for WCMW-6-234; 0.5* for WCMW-3-134; 4.0* for VIN-2B)	0.05
Mercury	0.0	0.002
Nickel	0.2*	0.1
Nitrite as N	0.05	1.0
Nitrate as N	3.0	10.0
Nitrate+Nitrite as N	11.0*	10.0
pH	6.0 min* (6-9 range* for CRMW-3B-63 and WCMW-3-134; 6.5-8.5 range for GVMW-8A, WCMW-6-234, and VIN-2B)	6.5-8.5
Selenium	0.024	0.02
Sulfate	1070* for CRMW-3B-63; 250 for GVMW-8A, WCMW-6-234, and WCMW-3-134; 800* for VIN-2B	250
Zinc	0.70 (2.0 for CRMW-3B-63, GVMW-8A, WCMW-6-234, WCMW-3-134, and VIN-2B)	2.0

* DRMS approved NPL is greater than the most restrictive Table Value Standard.