



COLORADO

Division of Reclamation,
Mining and Safety

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

October 9, 2018

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

**Re: Cripple Creek & Victor Mining, Co., Cresson Project, M-1980-244;
Second Round Comments on Record of Construction Report, VLF2 Recertification Report,
Subgrade and Geomembrane 9750 – 9900' Elevations.**

Dear Mr. Schaffner:

The Division of Reclamation, Mining and Safety (Division) has completed the review of CC&V's October 5, 2018 responses to our October 3rd Comments on the Construction Report, VLF2 Recertification Report, Subgrade and Geomembrane 9750' – 9900' Elevations dated August 13, 2018. The following comments need to be addressed prior to the Division accepting the submitted report:

Report text:

1. Section 2 Project Description: The response was adequate.
2. Section 5.1.5 Geomembrane Destructive Testing: The response was adequate.
3. Section 5.1.5 Geomembrane Destructive Testing: The response was adequate.

Appendix B Daily Observation Reports:

4. Field Daily Progress Report August 7 through 11, 2018: **The response was not adequate.** The response states “small holes were punctured into the geomembrane liner” during the relocation of the 9850 header pipe. The response paragraph immediately following this statement indicates repairs included “geomembrane patches over large holes”, as well as “geomembrane beading the smaller holes”. Finally, the third paragraph in this response states the narrative was completed prior to the repairs being completed. A review of documents submitted to the Division found a May 3, 2018 letter addressing the “Follow-Up – Header Removal”. The letter states 1,000 feet of the 9850 header pipe was removed on April 27, 2018, but does not mention any damage to the geomembrane liner during the process. This October 5, 2018 response narrative raises the following additional concerns:
 - a. First and foremost, why was the Division not notified of this damage to an environmental protection facility (EPF) on or shortly after April 27th?



- b. What was the extent of this small and large hole damage? Please provide a map with your response narrative.
- c. Please provide documentation the repairs made specifically to the liner damaged by the header removal were tested and approved in accordance with the approved specifications.
- d. Why was the certification report narrative completed prior to repairs being completed?

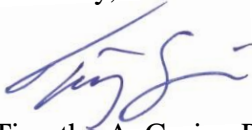
Appendix E Geomembrane Installation Summaries:

- 5. Appendix E.3 Geomembrane Extrusion Trial Seam Summary: The response was adequate.
- 6. Appendix E.4 Geomembrane Fusion Welding Summary: The response was adequate.
- 7. Appendix E.6 Geomembrane Fusion Destructive Testing Summary: The response was adequate.
- 8. Appendix E.6 Geomembrane Fusion Destructive Testing Summary: The response was adequate.
- 9. Appendix E.6 Geomembrane Extrusion Destructive Testing Summary: The response was adequate.

Pursuant to Rule 7.3.1(5), no chemicals used in the extractive metallurgical process or toxic or acid-forming materials ... shall be placed in constructed facilities until the Board or Office accepts the certification of the facility, or phase thereof, that precedes placement.

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: Russ Means, DRMS
Michael Cunningham, DRMS
Amy Eschberger, DRMS
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DRMS file
Meg Burt, CC&V
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