



COLORADO

Division of Reclamation,  
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215  
Denver, CO 80203

October 10, 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-104) Preliminary Adequacy Review**

Dear Mr. Schaffner:

The Division of Reclamation, Mining and Safety (Division) received a request for a Technical Revision (TR-104) addressing the following:

*Mineralized Waste Processing*

The submittal was called complete for the purpose of filing on August 28, 2018. **The decision date for TR-104 was extended on September 20<sup>th</sup> to October 23, 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 (TR).

The following comments are based on the Division's review of the request for TR-104:

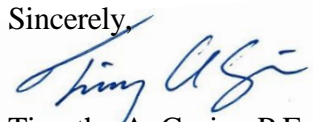
- 1) Figure 1: The provided map covers only slightly more than half an 8 ½ x 11 sheet of paper, has red text that is difficult to read and has no scale. Please provide a revised map meeting the requirements of Rule 6.2.1(2)(e) and C.R.S. 34-32-112(4)(d) to include: an acceptable map scale not larger than 1 inch = 50 feet nor smaller than 1 inch = 660 feet. Also, that a map scale, appropriate legend, map title, date and a north arrow (the Division notes the map provided did have a north arrow) shall be included.
- 2) Impacts on approved pit backfill: The narrative indicates as much as one hundred million tons of overburden might now be reclassified as ore. Some of the identified sources appear to be existing pit backfill (e.g., east cresson waste and Altman dump). Please provide some narrative as to whether:
  - a. CC&V is requesting any reductions in the volume of approved pit backfill,
  - b. CC&V intends significant changes in overburden storage area topography.



- 3) Placement of “re-mined” mineralized waste: The narrative indicates the material will be placed (crushed or as runoff mine) on one of the Valley Leach Facilities (VLFs). The Division is under the impression the Arequa Gulch VLF (a.k.a. VLF 1) is completely built out to the maximum approved capacity. If this is the case, there appears to be only one option for material placement; that being the Squaw Gulch VLF (a.k.a. VLF 2). Please clarify where the material is to be placed, and if VLF 1 is an option, how that corresponds the approved VLF 1 build out.
- 4) Mine process: Please provide additional narrative regarding:
  - a. What equipment will be used and how the mineralized waste will removed, crushed and transported to its new destination,
  - b. How will the removal affect existing overburden storage area lifts and overall geotechnical stability.

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: Michael Cunningham, DRMS  
Amy Eschberger, DRMS  
Elliott Russell, DRMS  
DRMS file  
Meg Burt, CC&V  
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