



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources

1313 Sherman St. Room 215
Denver, CO 80203

November 1, 2018

Mike Schaffner
CC&V Gold Mining Co.
P.O. Box 191
Victor, CO 80860

RE: Cresson Project, Permit No. M-1980-244, Ground Water and Surface Water Monitoring Data - 3rd Quarter 2018, Incomplete Submittal

Mr. Schaffner:

On October 24, 2018, the Division of Reclamation, Mining and Safety (Division) received your Ground Water and Surface Water Monitoring Data - 3rd Quarter 2018 submittal for the Cresson Project. After review of this report, the Division has identified the following items that require clarification and/or revision:

- 1) The submittal does not include monitoring data for two of the 18 approved groundwater Numeric Protection Levels (NPLs): Aluminum and Nitrite as Nitrogen. Please clarify why this data was not provided as required by the corrective action outlined in the Division's inspection report mailed on August 3, 2018. If this data is available, please submit it with a revised report. If this data is not available at this time, it must be provided with the next monitoring report.
- 2) The submittal does not include NPL exceedances in the summary page as required by the corrective action outlined in the Division's inspection report mailed on August 3, 2018. Please include this information with a revised report.
- 3) The submittal does not include any water quality standards for surface water sampling parameters as required by the Division's inspection report mailed on August 3, 2018. Please include this information with a revised report.
- 4) The submittal does not include the approved NPLs for some of the groundwater monitoring parameters (e.g., Arsenic, Iron, Nitrate as Nitrogen). The approved groundwater NPLs are presented in the enclosed Table A. Please include this information with a revised report.
- 5) Starting with the revised report, please be sure that groundwater monitoring data and surface water monitoring data are clearly separated (e.g., as separate attachments).



- 6) While the Division does not require the quarterly monitoring reports include laboratory analytical reports, completed chains of custody, or field forms, please confirm these documents could be made available at the Division's request. Please also confirm the surface water and groundwater sampling and analysis plans and standard operating procedures for sample collection could be made available at the Division's request.

Please submit the revised 3rd quarter 2018 monitoring report within thirty (30) days of the date of this letter, by **December 1, 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

Encl: Table A – DRMS Approved 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

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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.