



COLORADO

Division of Reclamation,  
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215  
Denver, CO 80203

January 15, 2019

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; Review Comments for Removal of The Crushed Ore Stockpile & Liner Integrity Verification Project Record of Construction Report, (TR-100 Addendum)**

Dear Mr. Schaffner:

The Division of Reclamation, Mining and Safety (DRMS) has completed the review of the "Addendum to VLF2 Liner Inspection TR#100 Record of Construction Report – VLF2- Removal of The Crushed Ore Stockpile & Liner Integrity Verification Project" Record of Construction Report received December 19, 2018 via email. 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.

We require additional discussion and/or clarification on the following:

1. Pot Hole #14: There are no comments in the report specific to any of the potholes, only the photographs. The photograph of pot hole #14 on page 7 of Appendix A shows a large geomembrane wrinkle running diagonally across the pot hole. The DRMS is concerned when several hundred feet of ore is loaded on this wrinkle, it may fold flat and the crease may lead to a tear in the liner. Please provide a summary of observations made for each of the 34 pot holes and discuss the potential for liner failure when the Pot Hole #14 wrinkle is loaded with ore.
2. Pot Hole #8: Based on the daily logs in Appendix B, it appears all potholes were dug on either December 6<sup>th</sup> or 7<sup>th</sup>, 2018. Pot holes 1, 7, 16, 17 and 18 through 34 were dug on the 6<sup>th</sup>. Pot holes 2 through 9 through 16 were dug on the 7<sup>th</sup>. When was Pot Hole # 8 dug?

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

