



Teller County Community Development Services

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February 6, 2019

Justin Raglin
Katie Dehlin
Senior Environmental Manager
Cripple Creek and Victor Gold Mining Company (CC&V)
Box 191, Victor, CO 80860

SUBJECT: Planning Review: Re. No Impact Technical Revision (Appendix A - 8.B) of Cripple Creek and Victor Gold Mining (CCV) Permit No. M-1980-244; Cripple Creek & Victor Gold Mining Company; Cresson Project; - TR #111 – Cement Substitution on Valley Leach Facilities.

Dear Mr. Raglin and Ms. Dehlin:

The Teller County Planning Department has completed its review of the Newmont Mining Corporation's (CC&V) Technical Revision TR # 111 – Cement Substitution on Valley Leach Facilities

1. Teller County understands that the Newmont Mining Corporation – CC&V is proposing this modification to reduce costs and use the longer duration pH – buffering properties of cement. As a result of this modification request Newmont has submitted Technical Revision TR # 111 to the Division of Reclamation, Mining and Safety (DRMS).
2. Currently CC&V's crusher system uses lime which is added into the crushed ore and controlled by a 'screw feeder' onto the crushed ore conveyor at the rate of 10-13 pounds of lime per ton of mined ore. Once the lime has been mixed with the ore it is placed into haul trucks and placed on the VLFs.
3. It is understood that both lime and cement are chemically similar but that using cement allows for a longer-term buffering capacity of the leach solution. Further, if it is more economically feasible to use lime or there is a shortage of cement, CC&V will revert to using lime as previously approved.
4. Further, in follow on email correspondence with your office, Teller County posed three additional questions related to TR #111 to assist in our review.
 - **Is there anything in Amendment 11 that would prevent using cement instead of lime?** Response received: No; as the use of cement would be applied and distributed in the exact manner as lime has been mixed/applied to the Valley Leach Facility (VLF) Ore.
 - **Are there any ground water impacts or conversely, what is being done to insure no groundwater is impacted?** Response received: Utilizing the proposed cement product will not impact groundwater as all of this material will be placed on the lined VLFs.

Additionally, the cement product is virtually the same as the lime product we currently use. (See Attachment 2 in TR request for chemical composition.)

- **Will the cement product be used on or off liner?** *Response received. All VLFs have leak detection and monitoring to insure liner integrity. All lined facilities are designed, constructed, and certified by a qualified, third party engineer. Certifications are submitted and must be approved by DRMS, prior to ore placement of leach solution application on the VLF's.*
- 5. Teller County has reviewed TR #111 against the standards contained in Appendix A, CCMOD, sections 8.A and 8.B and finds that it is compliant. In *Section 3.B.3 Mining Development Plan*, staff notes that "Comminution (crushing and grinding), screening, storing, blending, loading, conveying, slurrying, hauling, dumping or otherwise moving earth materials and associated materials such as lime, **cement**,....." is an additional permitted use when associated with an approved MDP such as (CCV) Permit No. M-1980-244; Cripple Creek & Victor Gold Mining Company; Cresson Project.
- 6. Based on the additional information provided by Katie Dehlin, Newmont's Senior Environmental Coordinator and TR #111 and supporting attachments, Teller County concurs with TR # 111 as written.

If you have any questions, please contact me at (719) 686-5414 or email williamsd@co.teller.co.us.

Respectfully,

Dan Williams



The Teller County Planning Official

Cc: Lynda Morgan, CDSO Director
Camille Krochta, Administrative Planning Assistant
Tim Cazier, DRMS