



COLORADO

Division of Reclamation,  
Mining and Safety

Department of Natural Resources

1313 Sherman Street, Room 215  
Denver, CO 80203

April 30, 2019

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-114) Preliminary Adequacy Review**

Dear Mr. Schaffner:

The Division of Reclamation, Mining and Safety (DRMS) received a request for a Technical Revision (TR-114) addressing the following:

*Silo Relocation*

The submittal was called complete for the purpose of filing on April 18, 2019. **The decision date for TR-114 is May 17, 2019.** 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.

The following comments are based on the Division's review of the request for TR-114:

- 1) Figures and Maps: Pursuant to Rule 6.2.1(2), Maps and Exhibits, maps, except the index map, must conform to the following criteria:
  - a) show name of Applicant;
  - b) must be prepared and signed by a registered land surveyor, professional engineer, or other qualified person;
  - c) give date prepared;
  - d) identify and outline the area that corresponds with the application;
  - e) with the exception of the map of the affected lands ... shall be prepared at a scale that is appropriate to clearly show all elements that are required to be delineated by the Act and these Rules. The acceptable range of map scales shall not be 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 shall be included. *[In addition, maps and figures utilizing photographs (ground-based, aerial or satellite) should include the date of the image.]*

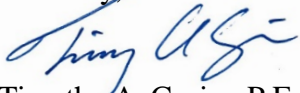


With the exception of Figures 1 and 4 (labeled Figure 3, and neither of which include the date of the aerial image), the figures in the TR-114 submittal do not conform to the standard in Rule 6.2.1(2).

- a) Please resubmit Figures 2 and 3 to conform to Rule 6.2.1(2). Figure 3 only needs a “Figure 3 – Power Pole Location” label. Typed is preferred, hand-written is acceptable.
  - b) Please resubmit Figure 4 (Power Pole Location) with a Figure 4 title, instead of the Figure 3 as in the original.
  - c) In lieu of resubmitting Figures 1 and 4 with the date of the aerial image, please provide the date of the image in your response to this adequacy letter.
- 2) Layout – Retaining Wall: The narrative on page 1 states the retaining wall is 100 feet long by 30 feet high. Figure 2 and the Attachment 1, SRCE Calculation indicate the wall is 20 feet high. Please clarify the height of the proposed retaining wall.
- 3) Layout – Conveyor: The DRMS is required to ensure adequate bonding is posted for all mining related permanent structures. The narrative does not discuss whether the proposed conveyor is a fixed, permanent structure or a mobile/portable structure. Please clarify the nature of the proposed conveyor and if fixed/permanent, provide dimensions of the conveyor and any concrete appurtenances.
- 4) Financial Warranty: The narrative on the second page, second sentence states the associated reclamation cost is \$10,350. The third sentence states the reclamation cost for the two power poles is \$507. The fourth sentence states the grand total is the same \$10,350. Referencing the SRCE calculations in Attachment 1: the first two sheets appear to indicate the demolition cost for the building, wall, and slab is \$9,221. No mention is made in the SRCE sheets for pole removal; the last six SRCE sheets suggest the combined earthworks cost for the silo site reclamation is \$622. If the \$9,221, \$507 and \$622 are added together, the total is \$10,350. If this is what was intended, please confirm this as the narrative and multiple sheets in Attachment 1 with the same total makes this assumption uncertain. *(Please note the DRMS intends to perform its own reclamation liability estimate for this TR. The response to Items 2 and 3 above will affect our calculations).*

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  
Elliott Russell, DRMS  
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