



**COLORADO**  
Division of Reclamation,  
Mining and Safety  
Department of Natural Resources

August 16, 2019

Mr. Mike Schaffner  
Cripple Creek & Victor Gold Mining Company  
P.O. Box 191  
Victor, CO 80860

**RE: Cresson Project, Permit No. M-1980-244; Review Comments for Squaw Gulch Valley Leach Facility Phase 2A Part 1 Record of Construction Report (TR-117) Adequacy Review No. 2**

Dear Mr. Schaffner:

The Division of Reclamation, Mining and Safety (DRMS) is reviewing the two-volume Squaw Gulch Valley Leach Facility Phase 2A Part 1 Record of Construction Report dated July 2019. In order to provide CC&V more time for responding to comments, the DRMS is providing comments as we proceed through the review process, rather than waiting until our review is complete and providing all comments upon completion of the review. As such, when responding to the comments in this letter, please be sure to include Adequacy Review No. 2 in the subject line.

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. The following comments need to be addressed prior to the DRMS accepting the submitted report:

**Report:**

1. Section 2.11 - Drain Cover Fill: Please address the following discrepancy and provide clarification:
  - a. 60,632 CY of DCF was placed within the Squaw Gulch VLF Phase 2A Part 1 area while Section 3.2.7 – Drain Cover Fill and Table 2 – Earthworks Testing Summary and Frequency both state 49,339 CY of DCF was placed.

**Tables & Appendices:**

2. Table 4 – Fill Temperature Monitoring Summary: Average fill temperature was recorded at 32°F on 4/23/19 at 7:00, 5/1/19 at 7:00, and 5/2/19 at 7:00 and 8:00. Within 3.6 of the Technical Specifications, "Frozen" is defined as a mean temperature of thirty-two degrees Fahrenheit (32°F) or less. Please address why SF and SLF placement occurred when fill material was frozen.
3. Table 12 – Nuclear Gauge Moisture-Density Testing Summary - Soil Liner Fill: SLF-33-N and SLF-34-N both tested on 6/12/19 passed while SLF-33-N-RT and SLF-34-N-RT both tested on 6/20/19 failed. Please provide clarification on why the retest samples were taken following testing which passed and why the retest samples failed.
4. Appendix D.3 – Underground Workings Remediation As-built Figures: Figure No. UG42 uses the B Underground Plug Installation Detail as depicted on Figure No. UG1. UG42 shows two polygons defined as Concrete while UG1 involves a Concrete Plug and Cemented Rockfill. Please provide an additional detail regarding UG42 or correct the polygons to indicate the Concrete Plug and Cemented Rockfill.



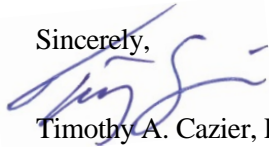
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Please note TR 117 is continues to be under review by the DRMS and additional comments may be forthcoming. If you have any questions or need further information, please contact me at (303)866-3567 x8169.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tim Cazier', is written over the word 'Sincerely,'.

Timothy A. Cazier, P.E.

Environmental Protection Specialist

ec: Michael Cunningham, DRMS  
Patrick Lennberg, DRMS  
Elliott Russell, DRMS  
DRMS file  
Justin Raglin, CC&V