



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

August 20, 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. 3**

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. 3 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. Pre-2019 Record Drawings: The table of contents lists four "Pre-2019 Record Drawings". The DRMS could find no reference to these drawings other than in the table of contents. What is the purpose of these drawings? If the DRMS is to include these drawings as part of the certification, there needs to be references in the report to these drawings and why they are needed. They will also need a signature date.
2. Post 2019 Record Drawings - Table of Contents and References: The table of contents and the references to these drawings in sections 2.3, 2.6, 2.7, 2.8, 2.10 and 2.11 do not correlate well or in most cases at all with the drawing numbers in the Drawing section of the report. The following table summarizes these discrepancies:



Table of Contents		Report Section / Reference	Actual "Record" Drawings	
RECORD DRAWING NO. 1 OF 6	TOP OF SOIL LINER FILL AS-BUILT	Sect. 2.7 / Record Drawing No. 1	Sheet No 1 of 3	Soil Liner Fill Asbuilt
			Sheet No 2 of 3	Soil Liner Fill Asbuilt
			Sheet No 3 of 3	Soil Liner Fill Asbuilt
RECORD DRAWING NO. 2 OF 6	UNDERDRAIN AS-BUILT	Sect. 2.3 / Record Drawing No. 2	Sheet No 1 of 1	Underdrain Asbuilts
RECORD DRAWING NO. 3 OF 6	HIGH VOLUME SOLUTION COLLECTION SYSTEM AS-BUILT	Sect. 2.10 / Record Drawing No. 3	Sheet No 1 of 3	High Volume Collection Pipe Asbuilts
			Sheet No 2 of 3	High Volume Collection Pipe Asbuilts
			Sheet No 3 of 3	High Volume Collection Pipe Asbuilts
RECORD DRAWING NO. 4 OF 6	LEAK DETECTION TRENCH AS-BUILT	Sect. 2.6 / Record Drawing No. 4	Sheet No 1 of 1	Leak Detection Trench Asbulits
RECORD DRAWING NO. 5 OF 6	GEOMEMBRANE PANEL LAYOUT AS-BUILT	Sect. 2.8 / Record Drawing No. 5	Drawing No. 5	Geomembrane Panel Layout As-Built
RECORD DRAWING NO. 6 OF 6	DRAIN COVER FILL AS-BUILT ISOPACH	Sect. 2.11 / Record Drawing No. 6	Drawing No. 6	Drain Cover Fill As-Built Isopach

- a. The inconsistencies between the drawing numbers and nomenclature need to be corrected.
3. Section 2.8 Geomembrane: Please clarify that the 666,080 sqft of liner being reviewed in Phase 2A part 1 is part of the 801,550 sqft indicated in App J-1.
4. Section 4 Project Deviations: The first bullet states the project technical specifications were sent to DRMS on July 7, 2016. Section 1.4 states the project specifications were updated in August of 2016. The August 2016 specifications are those the DRMS approved as part of TR-78. Are the deviations to the project with respect to the August or July specifications?

Drawings:

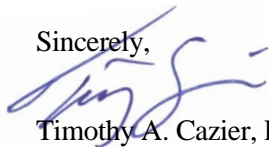
5. Soil Liner Fill Asbuilt, Sheet No. 2 of 3: One of the major contours on this drawing is labeled 9770. It appears it should be 9700. Please clarify and correct as appropriate.

Appendices:

6. Appendix K-5.1: Please address the following discrepancies:
 - a. In the destructive testing there are two samples that have failing tests, DF-823 and DF-825. In the subsequent tests there are tests that end in -N and -P. What are these indicating and update the tables with these clarifications?
 - b. The seam number for DF863 is incorrect, it is listed as P-2557/P-2558 when it should be P-2657/P-2658, please verify and update the table as needed.
7. Appendix K-5.2: The definition for the superscript² is missing, please update the table with this definition.

This concludes our initial review of TR 117. Additional comments will be limited to responses to this No. 3 adequacy review and to responses to our August 5, 2019 No. 1 and August 16, 2019 No. 2 adequacy reviews. 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

cc: Michael Cunningham, DRMS
Patrick Lennberg, DRMS
Elliott Russell, DRMS
DRMS file
Justin Raglin, CC&V
Katie Blake, CC&V