



September 5, 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-116) Preliminary Adequacy Review**

Dear Mr. Schaffner:

The Division of Reclamation, Mining and Safety (DRMS) received a request for a Technical Revision (TR-116) addressing the following:

Underground Exploration

The submittal was called complete for the purpose of filing on July 23, 2019. An extension request for the decision date was received and acknowledged by the DRMS. The current **decision date for TR-116 is September 18, 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 DRMS review of the request for TR-116:

- 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



[including the identifier from the application text, e.g., “Figure 2”], date and a north arrow shall be included.

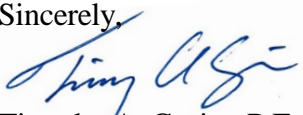
Each figure in part in the TR-116 submittal does not conform to the standard in Rule 6.2.1(2).

- i. Please resubmit Figures 1, 2 and 3 with the signature of the qualified person (ref. 1(b) above).
 - ii. Please resubmit Figures 2 and 3 to include “Figure 2” and “Figure 3”, respectively in the title block (ref. 1(d) and (e) above). *Note: during the DRMS scanning and review process, pages may become rearranged from the order in which they were submitted.*
 - iii. Figure 1: Figure 2 is a cross-section for which there is no reference as to where this section occurs. Figure 3 shows the location of proposed facilities using the local mine coordinates (not included on Figure 1), but it is difficult to determine from Figure 3 where the facilities are proposed in the Main Cresson Pit. Showing the location of the Figure 2 cross-section and the five proposed Figure 3 facilities on Figure 1 would help identify the locations of each. Please resubmit Figure 1 with these locations, or provide an additional figure meeting the requirements of Rule 6.2.1(2) showing the location of the cross-section and the five proposed facilities with respect to the Main Cresson Pit as a whole (ref. 1(d) above).
 - iv. Figure 2 Legend: Figure 2 identifies the colored lines (VLF 1 liner, VLF 2 liner and the Phase 3 exploration drift), but does not identify the black/gray line. Each number on the vertical axis includes an “L”, which is not defined. Please resubmit Figure 2 with either a legend or a call-out for the black/gray line and identifying the “L” (ref. 1(e) above).
 - v. Figure 2 Scale: The scale indicates 1 inch = 400 feet. If the numbers on the vertical axis are in feet, this scale is incorrect. There are no numbers associated with the horizontal axis. If the 1" = 400' is the horizontal scale, please include “Horizontal” to the left of “Scale: 1" = 400'”. Otherwise, clarify both the horizontal and vertical scales (ref. 1(e) above).
- 2) Table 1: Table 1 indicates an additional 432,000 tons are to be mined. Will this material be placed on the valley leach facilities, overburden storage areas, or both? How does this additional material impact the approved footprint height and configuration of these facilities?
 - 3) Five support buildings: The only information included in the submittal regarding these five buildings is the names of each indicated on Figure 3. In order to review the demolition costs, we need to know the type of structure (cinder block, metal frame, wood structure, etc.); dimensions the buildings and their respective foundations; and whether any designated chemicals will be used in each. Please provide this information.
 - 4) Fuel Island Facility: A fuel island is also indicated on Figure 3. Will this facility be lined similar to the existing fuel island southeast of the Ironclad Facilities? The DRMS requires additional information similar to that submitted with TR-63.
 - 5) Implementation Schedule: The approved reclamation plan (reference AM-11 Exhibit C, Drawing C-6, dated 12-15-2015 and Exhibit F, Drawing F-1, dated 9-30-2016) includes

approximately 400 feet of backfill in the Main Cresson Pit. How would the construction of the support buildings, the portal and drifts impact the reclamation plan and its schedule?

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 A. Cazier".

Timothy A. Cazier, P.E.
Environmental Protection Specialist

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