



October 29, 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 2 Record of Construction Report (TR-118); Second Adequacy Review

Dear Mr. Schaffner:

The Division of Reclamation, Mining and Safety (DRMS) has completed its review of CC&V's responses to our October 22, 2019 Adequacy Review No. 1 and our October 24, 2019 Adequacy Review No. 2 for which we received responses on October 25, 2019; for the Squaw Gulch Valley Leach Facility Phase 2A Part 2 Record of Construction Report. This Second Adequacy Review letter conveys our acceptance or requests for additional information for both adequacy review letters and your responses.

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:

Phase 2A Part 2 Record of Construction Report (TR-118) Adequacy Review No. 1

Report:

1. Record Drawings - Table of Contents and References: The response is adequate.
2. Section 4 Project Deviations: Please address the following:
 - a. Grading changes and ROC drawings. **The Response is not adequate.** There is a discrepancy between what is stated in the first bullet: "The grading changes were minor and presented in the Record of Construction Drawings" and what is presented in the Record of Construction drawings. Your response indicates these grading changes are minor and not reflected in the ROC drawings, yet the revised report still states these changes are shown in the ROC drawings. Please provide a report and drawings that are consistent.
 - b. "...extrusion welding..." The response is adequate.

Tables:

3. Table 4 – Fill Temperature Monitoring Summary: The response is adequate.
4. Table 8 - CQA Earthworks Testing Summary - Drain Cover Fill: The response is adequate.
5. Table 8 - CQA Earthworks Testing Summary - Drain Cover Fill: The response is adequate.

Drawings:



6. Soil Liner Fill Asbuilt, Sheet Nos.1, 2 and 3: The response is adequate.
7. High Volume Collection Pipe Asbuilts, Sheet Nos.1, 2 and 3: The response is adequate.
8. Geomembrane Panel Layout As-Built, Drawing No. 10: The response is adequate.
9. Drain Cover Fill As-Built Isopach, Drawing 11: The response is adequate.

Appendices:

10. Appendix E: Both of the Soil Liner Acceptance Forms for August 20, 2019 and August 22, 2019: The response is adequate.
11. Appendix E: The Soil Liner Acceptance Forms for September 9, 2019 through September 12, 2019: The response is adequate.
12. Appendix I.5: The response is adequate.
13. Appendix J.5.1: The response is adequate.
14. Appendix J.5.2: The response is adequate.

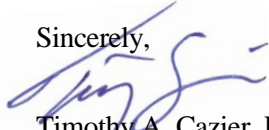
Phase 2A Part 2 Record of Construction Report (TR-118) Adequacy Review No. 2

Appendices:

1. Appendix J.7: The response is adequate.

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
Patrick Lennberg, DRMS
Elliott Russell, DRMS
DRMS file
Justin Raglin, CC&V
Katie Blake, CC&V