



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

August 5, 2020

Ms. Melissa Harmon
Cripple Creek & Victor Gold Mining Company
P.O. Box 191
Victor, CO 80860

**RE: Division Adequacy Review; Second Quarter 2020 Groundwater and Surface Water Report;
Cresson Project, Permit No. M-1980-244**

Dear Ms. Harmon,

On July 28, 2020, the Division of Reclamation, Mining and Safety (Division) received your Second Quarter 2020 Groundwater and Surface Water Report for the Cresson Project, Permit No. M-1980-244. Please respond to this adequacy review with a letter summarizing each response, to the numbered items below, in a cover letter titled "Review Response Second Quarter 2020 Groundwater and Surface Water Report, M-1980-244". The Division requires additional information and clarification to help interpret how groundwater and surface water are being impacted at the site. Please provide the following:

1. The field sheets that correspond with the samples taken at each location so the Division can verify that sampling was conducted in accordance with the Sampling and Analysis Plan and accepted industry standards.
2. A general site location map that shows where the monitoring locations are relative to major mining operations, please include both groundwater and surface water locations on this map.
3. Detailed location maps, similar to those provided in the May 2020 exceedance notification, for each basin monitored.
4. A narrative that accounts for each analyte that exceeds the numeric protection limit (NPL) or table value standard (TVS) (whichever concentration is greater) concentration on a location by location or basin by basin basis.
5. Graphs of analyte concentrations that are above the TVS but below the NPL for any given location.
6. A graph of the Fluoride concentrations in the CRMW series of wells along with the numeric protection limit (NPL) concentration, which is equal to the Table Value Standard (TVS) concentration.



7. The exceedance graphs for PGMW-3 that were provided in the exceedance notification in May 2020, and explain why the graphs were not included in the quarterly report. The Division is concerned that there is a trend of increasing metals concentrations within this well since mid-2019 and requires an explanation that accounts for the observed increase.
8. The initials of the sampler in Appendix A (the Sampled By row is blank) for consistency and completeness.
9. The missing field pH measurements in Appendix A for CRMW-3C, CRMW-5A, CRMW-5B, and CRMW-5C.

Please provide clarification responses to the following:

10. In Appendix A, the Uranium concentration at CRMW-3B is near the TVS limit of 0.03 mg/l, is this concentration within the historical range or is the concentration increasing over time?
11. Monitoring well CRMW-5A there is a standard exceedance for Uranium that was not reported but detailed in Appendix A. Please provide a graph depicting the concentration of Uranium over time and an explanation as why it was not included in the report.
12. In Appendix A for PGMW-3 there is a standard exceedance for Cobalt that was not reported but detailed in Appendix A. The standard cited is an agriculture standard, please provide a graph depicting the concentration of Cobalt over time.
13. In Appendix A for SGMW-6B there is a standard exceedance for Beryllium that was not reported but detailed in Appendix A. Please provide a graph depicting the concentration of Beryllium over time and an explanation as why it was not included in the report.
14. Explain why but there are no sample results for SGMW-7A when in Appendix A it indicates a sample was collected.
15. In Appendix A for VIN-2B the measured concentration of Fluoride is less than 2.50 mg/l but the associated limit is 2 mg/l, please explain why this is not reported as TVS exceedance.
16. In Appendix A, the Manganese standard for WCMW-3 and WCMW-6 is 0.5 mg/l. In Table 4 the standard for Manganese is 0.2 mg/l (NPL). Is the standard for WCMW-3 correct? Please update standard for WCMW-6 for consistency and completeness.
17. In Appendix A for GV-02 there was an exceedance of the standard for pH, please explain why this is not reported as an exceedance.

This concludes the Division's review of the Second Quarter 2020 Groundwater and Surface Water Report. The Division reserves the right to further supplement this document with additional items and/or details as necessary.

The due date for your response has been set for September 4, 2020.

If you need additional information or have any questions, please contact me at Division of Reclamation, Mining and Safety, 1313 Sherman Street, Room 215, Denver, CO 80203, by telephone at **303-866-3567 x8114**, or by email at patrick.lennberg@state.co.us.

Sincerely,



Patrick Lennberg
Environmental Protection Specialist

cc: Justin Raglin, Cripple Creek & Victor Gold Mine
Ronald Parratt, Cripple Creek & Victor Gold Mine
Tim Cazier, Division of Reclamation, Mining & Safety
Michael Cunningham, Division of Reclamation, Mining & Safety
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