



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

July 30, 2021

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

Re: Adequacy Review, Revision No. TR128, Cresson Project, Permit No. M-1980-244

Dear Melissa Harmon,

On July 8, 2021, the Division received the request for a Technical Revision (TR128) for the Cresson Project, File No. M-1980-244, regarding the re-alignment of the access road from County Road 82 to the Ironclad Facilities. During the review of the material submitted, the Division determined that the following items need to be adequately addressed before TR128 can be considered for approval. Please respond to this Adequacy Review with the requested information and summarize each response to the numbered items below, in a cover letter titled "Adequacy Review Responses TR128, M-1980-244".

1. In 2016, the Operator submitted but then withdrew a proposed re-alignment of a similar access road route across Grassy Valley in TR84. The Operator included a map as a part of TR84 which delineated wetlands within Grassy Valley. Please revise Drawing A05 to include the delineated wetlands to demonstrate the TR128 access road avoids these wetlands.
2. Drawing A14 appears to depict material from Growth Medium Storage Area 6 which will need to be cut to facilitate the construction of the access road. Please confirm if this material is growth medium and if it is, please address the following:
 - a. Please provide the approximate amount of material that will be removed. Please confirm this quantity is not included in the 24,500 CY calculation of cut material that will be used as fill for the access road construction.
 - b. Discuss how the growth media will be handled and where it will be placed.
3. Drawing A14 shows two small squares at Station 59+00 within the footprint of the access road. Upon review of aerial images, these appear to be two old buildings. Are these two buildings of any historical significance? Please provide details of CC&V's plans with these two structures.
4. The Operator has included details of four drainage culverts associated with the new access road. Please address the following:
 - a. Drawing A40 shows the four culverts are proposed as 24" diameter in size, however Note 1 states that the size of the culvert may be changed at the discretion of the owner. Please provide a demonstration on what is the minimum sized culvert that would convey stormwater safely, considering the allowable headwater height available.
 - b. Please revise Drawing A40 to specify the length of the four proposed culverts.
 - c. Please provide details on the path of stormwater after being conveyed by culverts 1-3. Do these convey stormwater to existing ditches that report to EMP 018?



- d. The Stormwater Controls section states the culverts and riprap aprons were designed to manage “approved surface water calculations”. We assume this refers to the approval of TR-101 in November 2018. The proposed re-aligned access road and accompanying safety berms modify and redirect runoff such that those calculations should be revisited.
5. Please describe how stormwater runoff is controlled on the access road.
6. Please describe what stormwater and sediment control measures are proposed along the eastern side of the access road segment in Drawing A14 to minimize the disturbance to the prevailing hydrologic balance within Grassy Valley.
7. Please provide the total acreage of the disturbance associated with new access road, including the cut/fill footprint.
8. Please provide the anticipated volume of growth media to be salvaged as a part of the proposed access road and please specify which growth medium storage area this material will be stockpiled at.
9. It appears that some of the access road construction between Station 49+00 and 53+00 may involve the redisturbance of a historical mining disturbance which may be waste rock or tailings. Please address how this material will be handled if it is encountered.
10. Please submit a geotechnical stability analysis showing the addition of the road along the crest of the WHEX Pit highwalls does not affect the stability of the highwalls. The analysis will need to specifically cover the portions of the road from Station 2+00 to 10+00 and 32+00 to 42+00. The analyses should account for two simultaneously passing semi-trucks (H-20 loading) within these designated sections of the proposed road.

This concludes the Division’s adequacy review of TR128. This letter shall not be interpreted to mean that there are no other technical inadequacies in your revision as other issues may arise when additional information is supplied. Please be advised the Cresson Project Technical Revision TR128 may be deemed inadequate, and the request may be denied on **August 9, 2021**, unless the above mentioned adequacy review item is addressed to the satisfaction of the Division. If more time is needed to respond, the Division can grant an extension of the decision date following a request to do so by the Operator.

If you have any questions or need further information, please contact me at (303) 866-3567 x8132.

Sincerely,



Elliott R. Russell
Environmental Protection Specialist

Ec: Justin Raglin, CC&V
Michael Cunningham, DRMS