STATE OF COLORADO

Eschberger - DNR, Amy <amy.eschberger@state.co.us>

Second Adequacy Review Response to Technical Revision TR-130

Johnna Gonzalez <Johnna.Gonzalez@newmont.com> Wed, Jun 15, 2022 at 6:30 AM
To: Amy Eschberger - DNR <amy.eschberger@state.co.us>
Cc: Justin Raglin <Justin.Raglin@newmont.com>, Katie Blake <Katie.Blake@newmont.com>, "Michaela.Cunningham@state.co.us" <Michaela.Cunningham@state.co.us>, "Tim.Cazier@state.co.us" <Tim.Cazier@state.co.us>, Johnna Gonzalez <Johnna.Gonzalez@newmont.com>, Norma Townley <Norma.Townley2@newmont.com>, "Crepeau, Michael" <CrepeauM@co.teller.co.us>, "morganl@co.teller.co.us" <morganl@co.teller.co.us>

Dear Amy,

Attached please find our cover letter and attachment regarding the Second Adequacy Review Response to Technical Revision TR-130.

If you have any questions or concerns, please reach out to Johnna.Gonzalez@Newmont.com or Justin.Raglin@Newmont.com.

Thank you.

Newmont
CRIPPLE CREEK & VICTOR

Johnna Gonzalez

ENVIRONMENTAL

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NEWMONT.COM

2 attachments

Figure 1 - Rev B.pdf

2399K

14June2022_TR130SeconddequacyReviewResponse.docx.pdf
725K

Newmont
CRIPPLE CREEK & VICTOR

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June 14, 2022

ELECTRONIC DELIVERY

Ms. Amy Eschberger
Environmental Protection Specialist
Colorado Department of Natural Resources
Division of Reclamation, Mining and Safety
Office of Mined Land Reclamation
1313 Sherman Street, Room 215
Denver, Colorado 80203

RE: Permit No. M-1980-244; Cripple Creek & Victor Gold Mining Company; Cresson Project; Second Adequacy Review Response to Technical Revision 130 – Stormwater Improvements

Ms. Eschberger,

On April 1, 2022, Newmont Corporation's Cripple Creek and Victor Gold Mining Company (CC&V) received the Division of Reclamation, Mining, and Safety (DRMS) second adequacy review of Technical Revision(TR) 130 to Permit M-1980-244, proposing improvements to stormwater controls. Below are DRMS comments in **bold** followed by CC&V's responses in *italics*.

1) **Purpose The response requires additional information and/or clarification:**

a. Figure 1, New Sump: The first paragraph of the response states both the HGM sump and "New Sump" are shown on Figure 1. There is a label for the "Existing HGM Sump", but not for the New Sump. Please provide a revised Figure 1 with the "New Sump" identified. b. HGM Stormwater Storage: The response indicates virtually all of the lined storage volume (4.66 ac-ft of the assumed 4.68 ac-ft) will be taken up with the storage of stormwater resulting from a 100-year, 24-hour design storm. The DRMS has three concerns with this approach: i. Acid generating potential: Due to the potential acid generating nature of the mill platform backfill material, the DRMS has been encouraging CC&V to keep the water level pumped down over the HGM liner. The use of this non EPF lined basin (without a leak detection system) is not ideal. What other alternatives were evaluated? [Note: this appears to be an appropriate time to remind CC&V that a closure plan for the HGM liner is needed. The DRMS cannot allow a non-free draining liner to store water in a potentially acid generating environment at mine closure.] ii. Storage volume: In the past, when the DRMS has inspected the existing HGM sump, there has typically been an estimated two feet of water in the sump. How does the assumed 4.68 ac-ft of storage account for the seemingly perpetual volume of water typically stored on the HGM liner, as observed in the existing sump? iii. Foundation stability: The proposed approach uses virtually all the available storage, thereby saturating an estimated five to seven feet of the backfill subgrade on which the HGM foundation was constructed. Based on the proposed 0.005 gpm/sqft application rate of the stored stormwater over 74,000 sq.ft., the DRMS estimates it will take roughly 4.7 days to

draw down the intercepted design storm volume. Given the essentially constant mill operation and the resulting vibration, the DRMS is concerned about the foundation stability and the loss of containment of designated chemicals within the HGM, should the saturated subgrade fail to support the foundation. What evaluations have been performed to assess this possibility

See revised Figure 1indicating the location of the "New Sump":

With respect to managing water accumulation on the mill platform, CC&V proposes the following alternative in lieu of maintaining 76k sq ft of area on VLF 2 dedicated to the mill platform. The VLF2 is equipped with a crossover line that allows the transfer of process solution from ADR1 to the ADR2 spent tank. CC&V proposes to tie the mill platform water into this existing line, with a check valve to prevent back flow. The previously performed hydrodynamic model would already cover the addition of water to VLF2. This alternative would allow for increased flexibility to pump down the mill platform in the case of an extensive storm event, and would combine with ADR2 spent solution and be distributed across all production drip irrigation on the pad.

2) Schedule: Additional clarification is necessary. The second paragraph of the response states "the sediment accumulation in the "New Sump" area will be cleaned out and replaced with new DCF." When can the DRMS expect this to be completed?

The clean out of the sediment in the "New Sump" will be completed by the end of July 2022.

3) **VLF2 Discharge:** *Response from April 1, 2022 correspondence was considered adequate.*

4) **Times of Concentration :** *Response from April 1, 2022 correspondence was considered adequate.*

SCS Curve Numbers: *Response from April 1, 2022 correspondence was considered adequate.*

5) Rainfall depth: *Response from April 1, 2022 correspondence was considered adequate.*

6) Existing Depression Detention Pond: Additional clarification is necessary. Please address the following:
a) Is the discharge pumped or gravity flow? The response was considered adequate.
b) How will sediment be restricted…? The response was considered adequate.
c) How long is the depression expected to retain stormwater following the design event? The DRMS acknowledges there should be no process solution reporting to the proposed detention pond. Given truck traffic on and off the VLFs, it may not be appropriate to consider runoff captured by this detention pond as "non-contact water" and it may not be suitable for wildlife consumption. How will CC&V discourage wildlife from accessing and consuming this water during the time runoff is stored in the detention pond?

The runoff to be stored in the detention pond would be a maximum of 2.5 days. If CC&V continues to see water stored in the detention pond, bird balls or other deterrents will be put in place to mitigate wildlife attraction.

7) **HDPE pipe flow and design:** Response from April 1, 2022 correspondence was considered adequate.

8) **Water balance:** Response from April 1, 2022 correspondence was considered adequate.

9) **Channel/scour velocity:** The response requires additional information and/or clarification. The DRMS accepts the commitment to maintain the channel during the operational life of the mine. How will the potential scour of these channels be addressed for post closure?

At closure the channels will be regraded and sloped along with the haul roads.

10) **VLF2 discharge protection:** *Response from April 1, 2022 correspondence was considered adequate.*

11) **Bond impact:** **The response requires additional information and /or clarification. The response states "At closure, the pipe will be left in place and buried with final regrading of VLF1, 2 and the HGM platform." The approved permit includes costs for pipe demolition elsewhere. Please provide justification as to why this pipe should be exempted from demolition.**

Please see below for the direct and indirect costs for piping demolition.

	DIRECT COSTS	
	Component	**Subtotal**
	Pipe Removal	$ 31,733.67
	INDIRECT COSTS	
	All in DRMS indirect costs (29%)	$ 9,202.76
	TR130 Total Financial Warranty	**$ 40,936.43**
TR128 Update	Current Bond Held	$ 209,491,188.00
	TR128 Liability Amount	$ 208,675,968.05
	Surplus Warranty Amount	$ 815,219.95
TR130 Update	Current Bond Held	$ 209,491,188.00
	TR130 Liability Amount	$ 208,716,904.48
	Surplus Warranty Amount	$ 774,283.52

Should you require further information please do not hesitate to contact Johnna Gonzalez at 719-851-4190 or Johnna.Gonzalez@Newmont.com or myself at Justin.Raglin@Newmont.com.

Regards,

DocuSigned by:
Justin Raglin
A5AA058117F54C4...

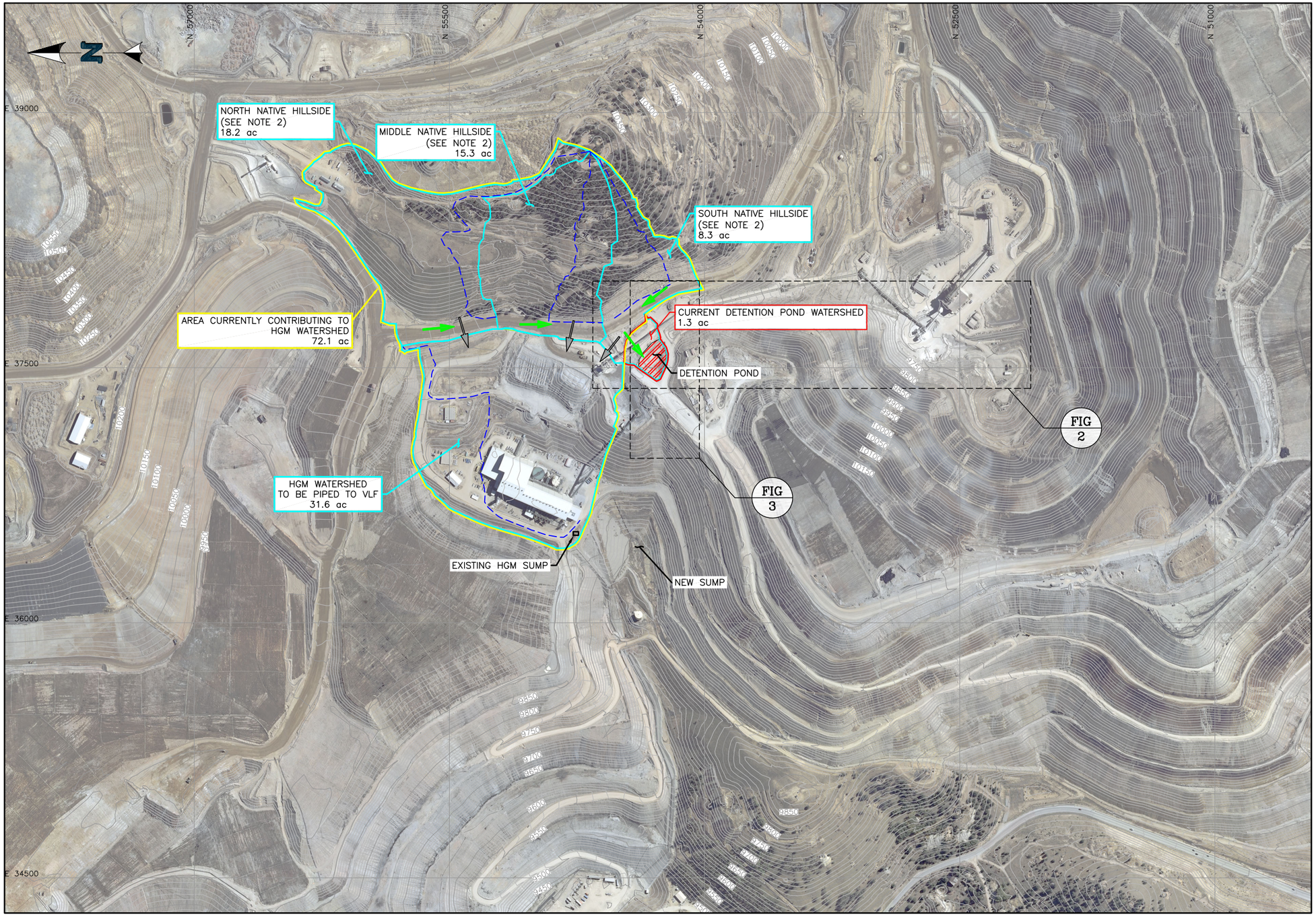
Justin Raglin
Sustainability & External Relations Manager
Cripple Creek and Victor Gold Mining Company

EC: T. Cazier– DRMS
M. Cunningham – DRMS
M. Crepeau – Teller County

L. Morgan – Teller County
J. Raglin – CC&V
K. Blake – CC&V

Enc (Figure 1)

File: S:\CrippleCreek\na.cc.admin\Environmental\New File Structure\2-Correspondence\DNR\DRMS\2022\Outgoing



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LEGEND:

- EXISTING AND PROPOSED GROUND CONTOURS
- TIME OF CONCENTRATION FLOW PATHS
- WATERSHED BOUNDARIES WITH PROPOSED MODIFICATIONS
- EXISTING HGM WATERSHED BOUNDARY
- EXISTING RUNOFF FLOW DIRECTION
- PROPOSED RUNOFF FLOW DIRECTION

NOTES:

1. CONTOURS SHOWN INCLUDE PROPOSED GRADING.
2. CURRENTLY REPORTS TO HGM WATERSHED. STORMWATER CONTROLS TO DIVERT RUNOFF TO DETENTION POND.
3. SEE FIGURE 2 FOR PLAN AND PROFILE OF DETENTION POND OUTLET PIPE.
4. SEE FIGURE 3 FOR VLF1 LINER CROSS SECTION UNDER DETENTION POND.

WATERSHED AREAS		
	EXISTING WATERSHED	PROPOSED WATERSHED
HGM	72.1 ac	31.6 ac
DETENTION POND	1.3 ac	41.8 ac

Reference:

NEWMONT PROVIDED THE 2020 FLYOVER DATA TO NEWFIELDS ON JAN. 13, 2021 IN THE FOLLOWING FILE: "5ft topo 9-1-20.DWG". EXISTING GROUND INCLUDES FUTURE SCHIST ISLAND PIT CONFIGURATIONS.

NewFields

CLIENT CRIPPLE CREEK & VICTOR GOLD MINING COMPANY

PROJECT STORMWATER IMPROVEMENTS

TITLE WATERSHED BOUNDARIES

FILENAME 0106.054.006F

FIGURE NO. 1

REVISION B

P:\Projects\0106.054 Stormwater Improvements\A-CAD\FIGS\0106.054.006F.dwg-4/20/2022 1:52 PM