



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

June 16, 2022

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

RE: Division Adequacy Review No. 3; Technical Revision 129 (TR-129) Proposed Numeric Protection Levels and Site Compliance Well Identification, Permit No. M-1980-244

Dear Ms. Boye,

On December 2, 2021, the Division of Reclamation, Mining and Safety (Division/DRMS) received your request for Technical Revision 129 (TR-129). After review of your responses, dated May 9, 2022, to the Division's Adequacy Review No. 2 dated April 5, 2022 the following list of items need to be addressed.

Proposed Numeric Protection Limits:

1. It was the Division's understanding, through meetings held on April 11th and May 3rd, 2022, the Operator would perform a statistical analysis of site data to develop numeric protection limits (NPLs) for each drainage. It was the Division's understanding the Operator planned to follow the Interstate Technology Regulatory Council (ITRC) Guidance Document: Groundwater Statistic and Monitoring Compliance, and use the EPA statistical program ProUCL to help develop the NPL concentrations. Instead, the Operator has presented NPL concentrations that are not based on an industry accepted statistical method, and in some instances, represent the maximum concentration detected in a particular basin at any time (e.g. fluoride in Arequa Gulch). The Division does not accept the proposed NPLs.

Please provide a timeframe for when the statistical analysis of site data will be completed and NPLs based on this analysis will be proposed to the Division.

Points of Compliance:

2. Please provide a map showing the proposed location(s) for the new point of compliance wells GVMW-26A and -26B. Additionally, please provide a timeframe for drilling and installing these wells. Finally, the Operator has verbally indicated potential access issues with the Division's suggested location for these wells. If this is still the case, please describe the access issues anticipated.



3. Please provide a timeframe for drilling and installing the new point of compliance wells SGMW-8 and PGMW-5.
4. Please commit to providing the Division with a Monitoring Well Drilling and Installation Report for the proposed new monitoring wells (GVMW-26A and -26B, SGMW-8, and PGMW-5) within 45 days of the last well being installed. At a minimum, the report must contain location maps of the installed wells, boring logs, well construction diagrams (with survey coordinates and measurements), well development records, and a narrative of the drilling program including any deviations or unexpected occurrences encountered during drilling.

This concludes the Division's Adequacy Review No. 3 of TR-129. The Division reserves the right to further supplement this document with additional items and/or details as necessary.

The current decision date for TR-129 is set for **July 22, 2022**. Please submit your response prior to the decision date to allow the Division sufficient time to review the materials submitted.

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
Katie Blake, Cripple Creek & Victor Gold Mine
Michael Cunningham, DRMS
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