

STATE OF
COLORADO

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

Adequacy Response

Norma Townley <Norma.Townley2@newmont.com>

Thu, Jul 14, 2022 at 10:26 AM

To: Amy Eschberger - DNR <Amy.Eschberger@state.co.us>

Cc: "Cunningham - DNR, Michael" <Michaela.Cunningham@state.co.us>, Patrick Lennberg - DNR

<Patrick.Lennberg@state.co.us>, "Crepeau, Michael" <CrepeauM@co.teller.co.us>, Katie Blake <Katie.Blake@newmont.com>,

Ronald Parratt <Ronald.Parratt@newmont.com>, Norma Townley <Norma.Townley2@newmont.com>

Ms. Eschberger, attached please find our Third Adequacy Response for TR 129 as well as an Extension Request. If you have any questions please reach out to Ronald.Parratt@Newmont.com or Katie.Blake@Newmont.com. Thank you.



Norma Townley

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2 attachments

**14Jul2022_DRMS_TR - 129 Adequacy Response 3.pdf**

1045K

**14July2022_TR129_ExtensionRequest.pdf**

146K

SENT VIA ELECTRONIC COMMUNICATIONS

July 14, 2022

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; Third Adequacy Review Response; Technical Revision 129 (TR-129) Proposed Numeric Protection Levels and Site Point of Compliance Well Identification, Permit No. M-1980-244

Ms. Eschberger:

Cripple Creek and Victor Gold Mining Company (CC&V) received the Division of Reclamation, Mining, and Safety (DRMS) third adequacy review response to Technical Revision 129 (TR-129) for Permit No. M-1980-244. CC&V has reviewed the comments issued in the letter dated June 16, 2022 from DRMS and has prepared responses for each comment. The DRMS adequacy review comments (*in italics*) and CC&V's corresponding response (**in bold**) are presented below.

Proposed Numeric Protection Limits:

- 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 Areqa 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.

As reviewed with the Division prior to the submittal of proposed NPLs on May 9th, CC&V used a method consistent with the Reg. 41 Interim Narrative Standards in setting proposed NPLs. CC&V understands the Division is requesting the use of a statistical method, such as the Interstate Technology Regulatory Council (ITRC) Guidance Document: Groundwater Statistic and Monitoring Compliance or the EPA statistical program ProUCL to set proposed NPLs. Due to the need for specialist statistical expertise, CC&V has initiated the process to retain a qualified consultant to complete the necessary work to ensure that the proposed NPLs meet the Division's expectations and are consistent with industry best practice. CC&V will submit an extension request to the decision date of this technical revision under separate cover, in alignment with the anticipated timeframe prior to the current decision date of July 22, 2022.

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.*

Please see the attached figure showing the anticipated drilling location for monitoring well GVMW-26. The drilling and construction of these wells is planned for 2022. As such, CC&V is initiating the process to retain the necessary contractors and determine the timeframe for materials to complete the installation of the proposed monitoring well locations. CC&V will provide a schedule for monitoring well completions once contracts are established. Should unforeseen challenges or disruptions during the drilling and construction of the proposed monitoring wells occur, CC&V will communicate with the Division.

3. *Please provide a timeframe for drilling and installing the new point of compliance wells SGMW-8 and PGMW-5*

As specified above, the drilling and construction of these wells is planned for 2022. As such, CC&V is initiating the process to retain the necessary contractors

and determine the timeframe for materials to complete the installation of the proposed monitoring well locations. CC&V will provide a schedule for monitoring well completions once contracts are established. Should unforeseen challenges or disruptions during the drilling and construction of the proposed monitoring wells occur, CC&V will communicate with the Division.

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 the drilling.*

CC&V commits to provide the Division with a Monitoring Well Drilling and Installation report to include location maps of 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 the drilling. CC&V commits to delivering this report within 45 days of the last well installation. Should any circumstance arise which may necessitate additional time to complete the specified report, CC&V will communicate with the Division regarding the circumstances and need for additional time.

Should the Division require further information please do not hesitate to contact Ronald Parratt at 719-851-4019 or Ronald.Parratt@Newmont.com or me at 719-851-4048 or Katie.Blake@Newmont.com.

Sincerely,



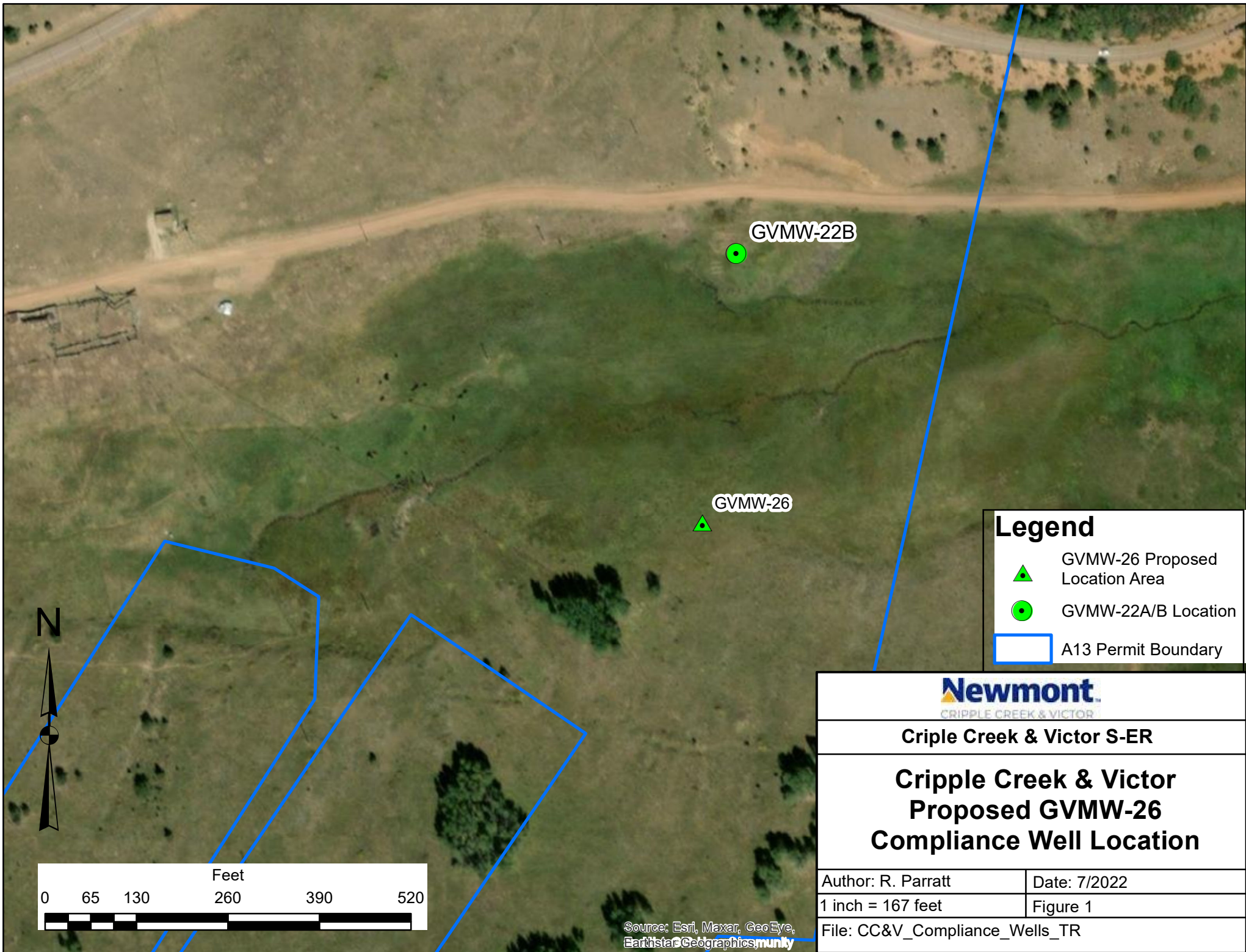
Katie Blake
Interim Sustainability and External Relations Manager
Cripple Creek & Victor Mine

EC: M. Cunningham – DRMS
A. Eschberger – DRMS
P. Lennberg
M. Crepeau – Teller County
R. Parratt – CC&V
K. Blake - CC&V




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Correspondence\DNR\DRMS\2022\Outgoing

Attachment A



Legend

-  GVMW-26 Proposed Location Area
-  GVMW-22A/B Location
-  A13 Permit Boundary

 CRIPPLE CREEK & VICTOR	
Cripple Creek & Victor S-ER	
Cripple Creek & Victor Proposed GVMW-26 Compliance Well Location	
Author: R. Parratt	Date: 7/2022
1 inch = 167 feet	Figure 1
File: CC&V_Compliance_Wells_TR	

Source: Esri, Maxar, GeoEye,
Earthstar Geographics, muntky