

STATE OF
COLORADO

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

Response to comments regarding DRMS July inspection and updated LDS maps as an addendum to AM-13

Johnna Gonzalez <Johnna.Gonzalez@newmont.com>

Wed, Sep 21, 2022 at 10:25 AM

To: "Amy.Eschberger@state.co.us" <amy.eschberger@state.co.us>

Cc: Katie Blake <Katie.Blake@newmont.com>, Norma Townley <Norma.Townley2@newmont.com>, "Cazier - DNR, Tim" <tim.cazier@state.co.us>, Patrick Lennberg - DNR <patrick.lennberg@state.co.us>, "Russell - DNR, Elliott" <elliott.russell@state.co.us>

Amy,

Please find attached response to comments regarding DRMS July inspection and updated LDS maps as an addendum to AM-13. If you have any questions or concerns, please contact me at Johnna.Gonzalez@Newmont.com or Katie.Blake@Newmont.com.

Thank you.

**Johnna Gonzalez**

ENVIRONMENTAL

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2 attachments

**21Sep2022_DRMS_UpdatedLDSMaps_AM13_combined.pdf**
5280K**21Sep2022_DRMS07262022InspectionResponse.docx.pdf**
391K



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September 21, 2022

SENT BY ELECTRONIC MAIL

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: Cresson Project, Permit No. M-1980-244; Addendum to AM-13 - LDS Updated Maps

Dear Ms. Eschberger:

This letter is in response to the email request received by the Division on August 26, 2022, requesting updated Leak Detection Sump (LDS) maps as an addendum to AM-13.

Please find the enclosed LDS maps that include VLF-1 Phase 4a.

Should you require further information please do not hesitate to contact Johnna Gonzalez at 719-851-4190 or Johnna.Gonzalez@newmont.com or me at Katie.Blake@newmont.com.

Sincerely,

DocuSigned by:

A handwritten signature in black ink that reads "Katie Blake".

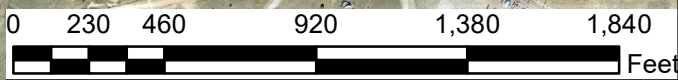
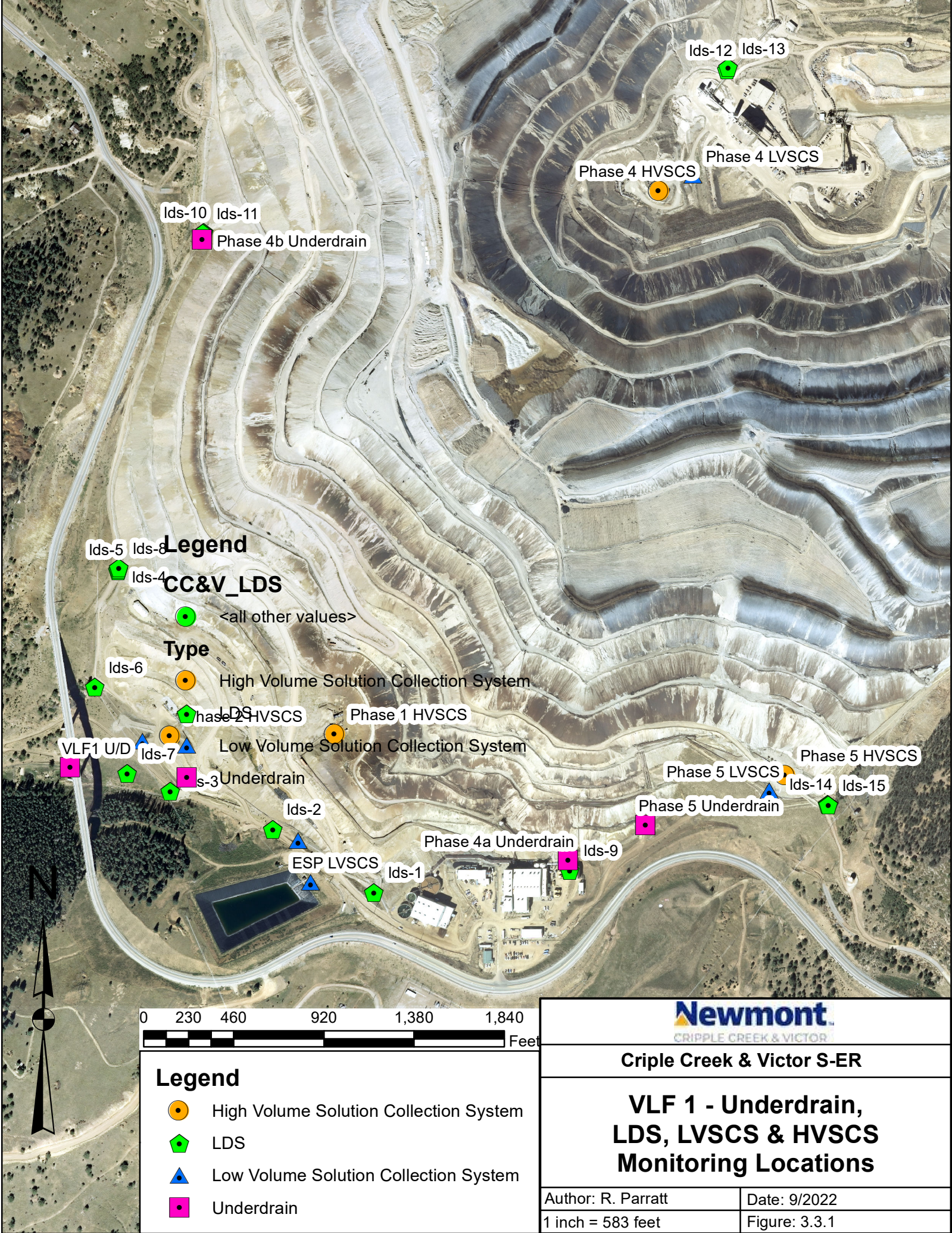
Katie Blake

Suitability and External Relations Manager
Cripple Creek & Victor Mine

EC T. Cazier - DRMS
E. Russell – DRMS
P. Lennberg - DRMS
K. Blake – CC&V
J. Gonzalez – CC&V

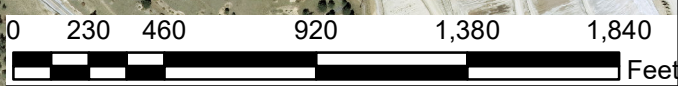
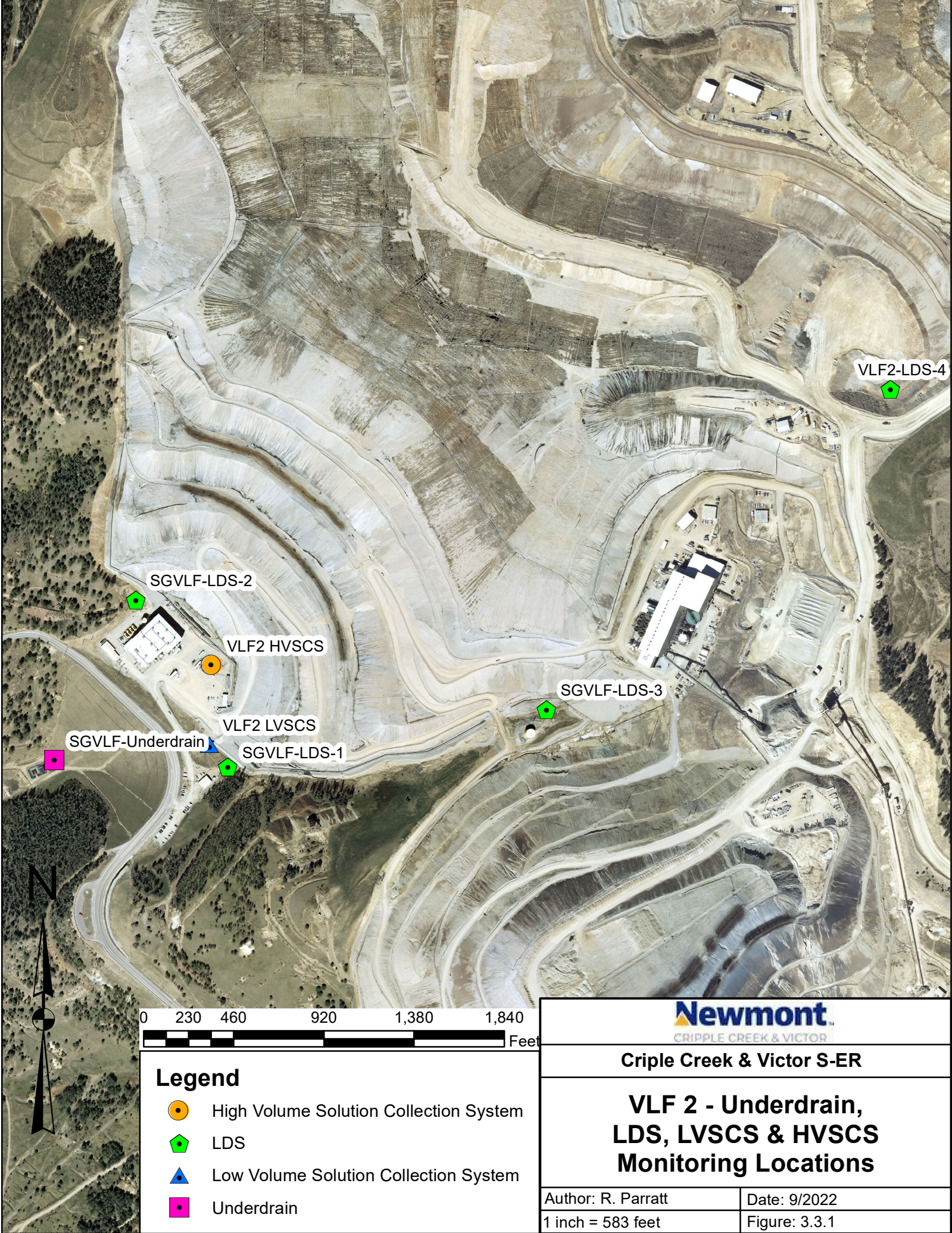
Enclosure

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Legend	
	High Volume Solution Collection System
	LDS
	Low Volume Solution Collection System
	Underdrain

 CRIPPLE CREEK & VICTOR	
Cripple Creek & Victor S-ER	
VLF 1 - Underdrain, LDS, LVSCS & HVSCS Monitoring Locations	
Author: R. Parratt	Date: 9/2022
1 inch = 583 feet	Figure: 3.3.1



Legend

- High Volume Solution Collection System
- ◆ LDS
- ▲ Low Volume Solution Collection System
- Underdrain

 CRIPPLE CREEK & VICTOR	
Cripple Creek & Victor S-ER	
VLF 2 - Underdrain, LDS, LVSCS & HVSCS Monitoring Locations	
Author: R. Parratt	Date: 9/2022
1 inch = 583 feet	Figure: 3.3.1



September 21, 2022

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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: Cresson Project, Permit No. M-1980-244; Monitoring of Mine Plan Response to Comments

Dear Ms. Eschberger:

On July 26, 2022, Colorado Division of Reclamation, Mining, and Safety (the Division) completed a routine monthly inspection, accompanied by representatives of Newmont Corporation's Cripple Creek and Victor Mining Company (CC&V). This letter is in response to the inspection report issued by the Division on August 26, 2022, following the inspection.

The inspection report issued to CC&V by the Division described two issues as listed below, with Division comments in italic text and CC&V response provided in bold text. Corrective actions for each of these issues are due by 9/25/2022 and October 25, 2022.

- 1. Division comment: The operator is not following the monitoring plan approved in Technical Revision No. 127 (TR-127) for the Valley Leach Facility (VLF) Leak Detection Sumps (LDSs). Specifically, LDS-12 and LDS-13 (for VLF-1) are regularly infiltrated by meteoric water and sediment, and sometimes completely buried by sediment, resulting in these sumps not being sampled per TR-127 due to "mud" present in the sumps, or in these sumps not being accessible for inspection. This is a problem as the purpose of the LDSs is to allow for the detection of leaks in the VLF, and these sumps are not being regularly inspected and/or sampled per the approved monitoring plan.*

Corrective Actions: By the corrective action due date, the operator shall provide a detailed plan for how LDS-12 and LDS-13 will be modified to prevent the infiltration of meteoric water and sediment into these sumps, and a schedule for completing the proposed modifications. This plan should also address how the sump inlet pipes will be inspected to ensure they are clear from obstructions (e.g., mud, debris).

Plan going forward:

- A work order has been entered to install extensions on LDS-12 and LDS-13. The extensions will help alleviate meteoric water from infiltrating into the sumps.
- Two sediment basins located above the sump area will be cleaned out to allow for additional catchment of meteoric water and sedimentation.
- Stormwater improvements will be made around the sumps, such as adding material that will prevent pooling and improve drainage.
- The sump inlets will be inspected for obstructions and if needed, flushed with freshwater to allow for visual inspection.

All improvements will be completed by October 15, 2022.

2. *Division comment: The operator is not following the monitoring plan approved in Technical Revision No. 27 (TR-127) for the Valley Leach Facility (VLF) Leak Detection Sumps (LDSs). Specifically, the operator has not placed visual markers in every LDS marking one foot above the bottom of the sump, so that it can be easily determined during the weekly inspection whether water in the sump has reached the level requiring sampling. Additionally, there are buckets still hanging from the sump inlet pipes in some of the LDSs, which was a practice utilized prior to TR-127 approval to determine whether water observed in the sump came from meteoric infiltration or the sump inlet. Keeping the buckets in the sumps interferes with the monitoring plan approved in TR-127.*

Corrective Actions: By the corrective action due date, the operator shall provide photographic evidence demonstrating that visual markers have been placed in accordance with TR-127 in the following eight LDSs (for VLF-1): LDS-1, LDS-2, LDS-4, LDS-5, LDS-6, LDS-7, LDS-12, and LDS-13. Additionally, photographic evidence must be provided to demonstrate the buckets have been removed from the following LDSs (for VLF-1): LDS-3, LDS-5, LDS-10, and LDS-11.

Photographs will be provided by the action due date of October 25, 2022.

Should you require further information please do not hesitate to contact Johnna Gonzalez at 719-851-4190 or Johnna.Gonzalez@newmont.com or me at Katie.Blake@newmont.com.



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Sincerely,

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5A3D013B629844B...

Katie Blake
Suitability and External Relations Manager
Cripple Creek & Victor Mine

EC T. Cazier - DRMS
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Enclosure

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