



September 21, 2022

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

RE: Cresson Project, Permit No. M-1980-244, Status Update on Required Corrective Actions

Ms. Boye:

The Division is providing the following status update on the corrective actions required in the Division's inspection report signed on August 26, 2022:

INSPECTION TOPIC: Gen. Compliance With Mine Plan

PROBLEM: 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 any obstructions (e.g., mud, debris).

CORRECTIVE ACTION DUE DATE: September 25, 2022

STATUS UPDATE: *On September 21, 2022, the operator submitted a plan for modifying LDS-12 and LDS-13 by October 15, 2022. This plan also addresses the sump inlets. Therefore, the Division considers this problem to be abated.*

INSPECTION TOPIC: Gen. Compliance With Mine Plan

PROBLEM: 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 and sampling 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.

CORRECTIVE ACTION DUE DATE: October 25, 2022

STATUS UPDATE: *This corrective action has not yet been submitted.*

If you have any questions, you may contact me by telephone at (303) 866-3567, ext. 8129, or by email at amy.eschberger@state.co.us.

Sincerely,

A handwritten signature in blue ink that reads "Amy Eschberger". The signature is written in a cursive, flowing style.

Amy Eschberger
Environmental Protection Specialist

Cc: Katie Blake, CC&V
Johnna Gonzalez, CC&V
Tim Cazier, DRMS
Elliott Russell, DRMS
Patrick Lennberg, DRMS
Michael Cunningham, DRMS