

October 26, 2022

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

RE: Cresson Project, Permit No. M-1980-244, Response to Corrective Actions

Ms. Boye:

The Division has completed its review of your corrective actions submitted on October 17, 2022 addressing the problems cited in the Division's inspection report signed on August 26, 2022 that pertain to the Leak Detection Sumps (LDSs). After completing its review, the Division has the following items that require additional information and/or clarification:

- 1) The Division has the following question(s) regarding the photos provided to demonstrate visual markers have been placed in the sumps to mark one foot above the bottom of the sump (in accordance with TR-127):
 - a. The photo of LDS-1 does not clearly show that an appropriate visual marker has been placed in this sump. Please provide a photo that clearly shows the visual marker.
 - b. The photo of LDS-2 shows a traffic cone has been placed on the bottom of the sump to indicate when one foot of water is present in the sump (same for LDS-6 and LDS-7). Please explain why a cone is being utilized as a visual marker rather than placing reflective tape on the sump wall (as was done in other sumps). Additionally, please specify the total height of the cone and which part of the cone (e.g., top, top of reflective stripe, bottom of reflective stripe) will be used to mark one foot of water in the sump.
 - c. The photo of LDS-4 indicates a reflective rectangle has been placed to mark the one foot level in this sump. It is difficult to make out any details in the photo provided. Please describe where exactly the reflective rectangle was placed in the sump. Additionally, please explain why this method is being utilized as a visual marker rather than placing reflective tape on the sump wall (as was done in other sumps). Finally, please describe how the rectangle will be used to visually indicate one foot of water is present in the sump.
- 2) The Division has the following question(s) regarding the photos provided to demonstrate the buckets have been removed from sump inlet pipes:



- a. The photo of LDS-10 only shows a portion of this sump, making it difficult to confirm the bucket has been removed from the inlet pipe. Please provide a photo that shows the entire sump bottom and inlet pipe.

This concludes the Division's review of your corrective actions submitted on October 17, 2022 pertaining to the LDSs. Please submit your response to the items listed above within two weeks of this letter, by **November 9, 2022.**

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,



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