

STATE OF
COLORADO

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

CC&V Response to DRMS Corrective Action Letter 9-30-2022

Ronald Parratt <Ronald.Parratt@newmont.com>

Thu, Oct 27, 2022 at 5:22 PM

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

Cc: Katie Blake <Katie.Blake@newmont.com>, Norma Townley <Norma.Townley2@newmont.com>

Dear Ms. Eschberger,

Please see the attached response to DRMS letter received by CC&V on September 30, 2022: Corrective Actions Required; Grassy Valley GVMW-25 Monthly Sampling August 2022; Cresson Project; Permit No. M-1980-244.

Best Regards,

Ronald Parratt

Site Water Coordinator

Water & Energy Specialist

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**DRMS_Response CAR; Grassy Valley GVMW-25 Monthly Sampling August 2022.pdf**

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October 27, 2021

ELECTRONIC DELIVERY

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: Corrective Actions Required; Grassy Valley GVMW-25 Monthly Sampling August 2022;
Cresson Project; Permit No. M-1980-244**

Ms. Eschberger,

Newmont Corporation's Cripple Creek and Victor Gold Mining Company (CC&V) hereby provides this response to the division's Corrective Action Request letter issued to CC&V on September 30, 2022. CC&V has reviewed the requests issued by the Division of Reclamation, Mining and Safety (DRMS) in the above referenced letter and has prepared responses for the requests. The DRMS requests are presented below (*in italics*) and CC&V's corresponding response (**in bold**) are presented below.

1. *Please provide a detailed explanation for the sudden and extreme spike in analyte concentration observed at GVMW-25 in August 2022, due within 30 days, by October 30, 2022.*

It is hypothesized that the increase in observed analyte concentrations at monitoring well GVMW-25 sample collected in August, 2022 is due to the significant rainfall observed in the prior month, July 2022. CC&V experienced rainfall accumulation of 5.88 inches during the month of July 2022, which is significantly above the 2000 – 2022 average of 4.12 inches.

2. *Pursuant to Rule 6.4.21(12), Water Quality Monitoring Plans are required to demonstrate that all Environmental Protection Plan requirements are being met and to ensure the operation is in compliance with applicable surface water and groundwater standards and permit conditions.*
 - a. *Currently there are no surface water sampling locations downgradient of GVMW-25 in Grassy Creek, which is a gaining stream downgradient of GVMW-25. The Division requires the establishment of a surface water sampling location downgradient of GVMW-25 as close to the current permit boundary as possible, at a location that routinely has water available to sample. Sampling of this location must begin within five (5) business days of the date of this letter. Please notify the Division the date the sample is collected. The sample shall be collected following the currently approved surface water sampling procedures, and be analyzed for the same constituents that GVMW-25 is currently analyzed*

for. Laboratory analysis of the collected sample must be expedited and the results reported to the Division as soon as they are available.

CC&V identified a suitable downgradient surface water monitoring location, GV-06, and notified the Division of the date which samples were collected as directed by the correspondence provided (10/4/2022).

- b. On the same day as the surface water sample is collected, samples must also be collected from GVMW-25 and both seep locations. These samples must be analyzed for the same constituents that GVMW-25 is currently analyzed for, enabling comparability of results. Laboratory analysis of the collected samples must be expedited and the results reported to the Division as soon as they are available.*

CC&V collected water samples from monitoring well GVMW-25, and both identified seep locations on the same date as the surface water monitoring location was sampled (10/4/2022), and submitted all samples for the same water quality analysis parameters.

- c. The operator will be required to expand the monthly sampling program to include GVMW-25, both seeps, and the downgradient surface water monitoring location. Reporting of the sample results, both immediately and monthly, must include a map showing the sampling locations, and also the field sheets, and QA/QC samples per the approved Surface and Groundwater Sampling Plan.*

CC&V will submit the above specified information to the Division as requested.

- 3. The operator must submit a Technical Revision within 30 days, by October 30, 2022, which includes a revised surface water sampling plan and map to incorporate the new creek monitoring location, and a detailed monitoring and reporting program for the ECOSA seeps. This revision must also include a short term plan for management of the seep during active mining operations and a long term plan for final closure of the mine which prevents or minimizes any further impacts to the hydrologic balance by the ECOSA. Any facility that is designed, constructed and operated for control of containment of acid mine drainage shall be considered to be an Environmental Protection Facility (EPF) pursuant to Rule 1.1(21). All EPFs shall be designed and constructed in accordance with Rule 7.3.*

CC&V will submit the requested Technical Revision by the specified date.

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

Regards,



Katie Blake
Sustainability & External Relations Manager
Cripple Creek and Victor Gold Mining Company

EC: A. Eschberger – DRMS

M. Cunningham – DRMS
M. Crepeau – Teller County
L. Morgan – Teller County
R.Parratt – CC&V