

STATE OF
COLORADO

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

Third Adequacy Response to TR 130-Stormwater Improvements

Norma Townley <Norma.Townley2@newmont.com>

Wed, Nov 9, 2022 at 5:49 AM

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

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Amy, please find attached our Third Adequacy Response to Technical Revision 130 – Stormwater Improvements. If you have any questions or concerns please reach out to Johnna.Gonzalez@Newmont.com or Katie.Blake@Newmont.com. Thank you.

**Norma Townley**

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November 7, 2022

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: Permit No. M-1980-244; Cripple Creek & Victor Gold Mining Company; Cresson Project; Third Adequacy Response to Technical Revision Technical Revision 130 – Stormwater Improvements

Ms. Eschberger,

On August 25, 2022, Newmont Corporation's Cripple Creek and Victor Gold Mining Company (CC&V) received the Division of Reclamation, Mining, and Safety (DRMS) third adequacy review of Technical Revision (TR) 130 to Permit M-1980-244, proposing improvements to stormwater controls. Below are DRMS comments in **bold** followed by CC&V's responses in *italics*.

1) Purpose The response requires additional information:

- a. **Figure 1, New Sump:** the response was considered adequate.
- b. **HGM Stormwater Storage:** The response partially addresses our concerns. The revised approach would pump infiltrated and intercepted stormwater over the HGM liner to the ADR2 spent tank, rather than directly to VLF2. This addresses concerns related to potentially saturating a dedicated area (76,000 sqft) on VLF2, but does not explicitly address concerns related to the storage volume available above the HGM liner (SAR Comment 1.b.ii) and the potential impact on the HGM foundation stability (SAR Comment 1.b.ii). the June 14th response states this approach "would allow for increased flexibility to pump down the mill platform in the case of an extensive storm event". Please provide an estimate for how long it would take to pump down the mill platform in the case of the 100-year, 24-hour design storm.

The expected storm event would send 4.66 ac-ft of water to the mill platform, equivalent to ~1.5 million gallons of water. Using one pump at 50 gallons per minute, it would take approximately 21 days to pump the mill platform, or 10.5 days if using two pumps.

- 2) **Schedule:** The response was considered adequate. The DRMS verified sediment had been cleaned out of the New Sump at the time of the August 23rd inspection.
- 6) **Existing Depression Detention Pond:**
How long is the depression expected to retain stormwater following the design event?
The response was considered adequate.

9) **Channel/scour velocity:** The response was considered adequate. The DRMS accepts both the previous commitment to maintain the channel during the operational life of the mine and the recent commitment to address the closure design for this channel, preferably as part of TR- 131.

11) **Bond impact:** The response was considered adequate.

New Comments

Water management: During the August 23rd inspection, CC&V representatives explained they intend to manage water in the New Sump area as process water, rather than as stormwater. The DRMS accepts this approach given that the New Sump is completely over the VLF1 liner and the revised stormwater management approach being proposed in TR-130 should all but eliminate runoff contributing to the New Sump from areas other than VLF1. However, this change needs to be confirmed in writing by CC&V, and will require ponded water in the New Sump be limited to less than three feet by three feet as stated in the approved wildlife protection plan. During the inspection, CC&V representatives confirmed they would not be able to rip the surface to promote infiltration of ponded water as is the practice on the stacked ore portions of the VLF. This is because the floor of the New Sump is in close proximity to the VLF liner and ripping the surface could pose a risk to the underlying liner integrity. During the inspection, one observed puddle in the New Sump appeared to exceed the three foot by three foot limitation on ponded process water. The puddle is most likely attributable to the recent heavy rains in the area. Nevertheless, the wildlife protection plan applies to areas managed as process water. Please provide the following:

- a. **Written confirmation that CC&V intends to manage water in the New Sump area as process water rather than stormwater.**

CC&V intends to manage water in the New Sump area as process water.

- b. **An approach to deal with ponded water in the New Sump where ripping is not feasible.**
If ponding is identified in the "New Sump" area that is larger than 3-feet by 3-feet, operators will hand excavate if necessary to allow for ponded water to infiltrate.

Should you require further information please do not hesitate to contact Johnna Gonzalez at 719-313-0447 or Johnna.Gonzalez@Newmont.com or myself at Katie.Blake@Newmont.com.

Regards,

DocuSigned by:

Katie Blake

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Katie Blake

Sustainability & External Relations Manager

Cripple Creek and Victor Gold Mining Company

EC: T. Cazier– DRMS
 M. Cunningham – DRMS
 M. Crepeau – Teller County
 L. Morgan – Teller County
 K. Blake – CC&V
 J. Gonzalez – CC&V