



November 17, 2022

Ms. Lori Smith
Cripple Creek & Victor Gold Mining Company
P.O. Box 191
Victor, CO 80860

**Re: Project, Permit No. M-1980-244;
Technical Revision (TR130) Fourth Adequacy Review**

Dear Ms. Smith:

The Division of Reclamation, Mining and Safety (DRMS) has completed our review of your responses (dated November 7, 2022) to our August 25, 2022 third adequacy review (TAR) letter for TR130.

The following Fourth Adequacy Review (FAR) comments, not specifically stating “The response was considered adequate.” require additional information prior to approval of TR-130 (*Note: previous comment numbering has been retained for tracking purposes*):

- 1) Purpose: Part (b) of this original comment requires additional information related to AM-13 Second Adequacy Comment No. 56 (August 31, 2020):
 - b. HGM Stormwater Storage: Each successive response to DRMS concerns regarding stormwater storage at the HGM relies on significant storage on the dual liner below the HGM. During the review of AM-13 and the November 16, 2020 workshop (where representatives from the DRMS and CC&V discussed managing the HGM liner as an EPF), CC&V committed to “*working with the Division on updating management policies and procedures for the HGM area as an EPF at this facility. The updates will be coordinated with the Division and formalized in a Technical Revision.*” Due to CC&V’s proposed reliance on extended storage of impacted/contact water and the mill liner for stormwater management, the DRMS requires the six outstanding issues from AM-13 Comment No. 56 be addressed as part of the TR-130 review process. The six issues are as follows:
 - i. Provide As-Constructed drawings showing the layout and topography of the lined surface. This should show the storage volume, floor and sill elevations, and how it ties into adjacent lined areas,
 - ii. Provide As-Constructed drawings showing how the sump system is integrated into the HGM liner (*this should also identify new or proposed appurtenances required to manage stormwater as a result of TR-130*),



- iii. Provide As-Constructed drawings showing the spatial relationship of the HGM liner and the fire suppression system water lines in the mill area,
- iv. Provide water quality data (consistent with the full suite of parameters sampled elsewhere on site [*i.e., the same as those sampled in site monitoring wells*]) for water stored on the liner,
- v. Provide a description of how water contained on the HGM liner is managed, including how the volume is determined and the ultimate disposition of water contained stored on the liner (*Notes: A) The DRMS acknowledges the CC&V's November 7th TAR response partially addresses water management; B) The response will need to demonstrate how the currently proposed 21-day storage of impacted stormwater meets the intent of Rules 3.1.7, 6.4.7(2)(b), and 7.3.1*)
- vi. Does CC&V have a water balance method for the contained/stored water volume?

New Comments

A. New Sump Water management:

- i. The response was considered adequate – the DRMS accepts CC&V's intent to manage water in the New Sump as process water.
- ii. The response was considered adequate – the DRMS accepts CC&V's approach to hand excavate, for the purpose of facilitating infiltration, any area of ponded water in the New Sump area larger than 3 feet by 3 feet.

If you have any questions or need further information, please contact me at (303)328-5229.

Sincerely,



Timothy A. Cazier, P.E.
Environmental Protection Specialist

ec: Michael Cunningham, DRMS
Amy Eschberger, DRMS
Patrick Lennberg, DRMS
Elliott Russell, DRMS

DRMS file
Katie Blake, CC&V