

February 16, 2023

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

**RE: Cresson Project; Permit No. M-1980-244; Technical Revision 132 (TR-132) - ECOSA Monitoring Plan Update; Adequacy Review No. 2**

Dear Ms. Smith,

On January 30, 2023, the Division of Reclamation, Mining and Safety (Division/DRMS) received your responses to the Division's preliminary adequacy review dated November 4, 2022. After review of your responses the Division has identified the additional items that need to be addressed.

**General**

1. Section 5.1 – Sampling Frequency of the QAPP needs to be updated to clearly state when the monthly sampling reports are to be submitted to the Division. The Division expects the reports to be submitted no later than 30 days after the last day of the preceding month.

**Surface Water Sampling Locations:**

2. Seeps 1 and 2 are an expression of groundwater flowing to the surface. To be consistent with other groundwater sampling locations these locations should be addressed under the Groundwater Sampling section of the QAPP. Table and Figure 2.1 need to be updated removing Seeps 1 and 2.
3. In the CDPHE stream segment analyte list, Table 2.3, the following parameters are missing from Table 2.2; chlorine, sulfide, phosphorus, arsenic dissolved, chromium III dissolved, chromium III total, chromium VI dissolved, iron dissolved, lead dissolved, manganese dissolved and nickel total. Table 2.2 needs to be updated to include these parameters. All future Grassy Valley monthly surface water samples need to be analyzed for the updated Table 2.2 list of parameters.

**Groundwater Monitoring Locations:**

4. To be consistent with item #2 mentioned above, the QAPP needs to be revised to reflect inclusion of Seeps 1 and 2 into the Groundwater Monitoring Locations, by updating the Table and Figure 3.1.



5. Table 3.2 needs to be updated to include the missing footnote for WAD Cyanide.
6. Table 3.3 needs to be updated to remove references to wells not located in Grassy Valley.
7. Table 3.3 needs to be updated with the missing analyte for Chloride as it is listed in Table 3.2.
8. Figure and Table 3.1 need to be updated to reflect the new Point Of Compliance wells in Grassy Valley, GVMW-26A/B, that will be included into the monthly monitoring when they are installed. Please include a footnote on the figure indicating the location of GVMW-26A/B are approximate and will be adjusted when more exact coordinates are known.

This concludes the Division's Adequacy Review No. 2 of TR-132 - ECOSA Monitoring Plan Update. The Division reserves the right to further supplement this document with additional items and/or details as necessary.

The decision date for this revision is currently set for **February 28, 2023**. If additional time is needed to address any adequacy items, an extension request must be received by our Office prior to the decision date.

If you need additional information or have any questions, please contact me by telephone at **303-866-3567 x8114**, or by email at [patrick.lennberg@state.co.us](mailto:patrick.lennberg@state.co.us).

Sincerely,



Patrick Lennberg  
Environmental Protection Specialist

cc: Katie Blake, Cripple Creek & Victor Gold Mine  
Ronald Parratt, Cripple Creek & Victor Gold Mine  
Elliott Russell, DRMS  
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