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Newmont
NORTH AMERICA

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SENT VIA ELECTRONIC COMMUNICATIONS

August 24, 2023

Mr. Patrick Lennberg
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: Additional Information Required, Grassy Valley Surface and Groundwater Monitoring May 2023; Permit No. M-1980-244

Mr. Lennberg:

Cripple Creek and Victor Gold Mining Company (CC&V) received the Division of Reclamation, Mining, and Safety (DRMS) Additional Information Required, Grassy Valley Surface and Groundwater Monitoring May 2023; Permit No. M-1980-244. CC&V has reviewed the comments issued in the letter dated July 26, 2023 from DRMS and has prepared responses for each comment. The DRMS comment (*in italics*) and CC&V's corresponding response (**in bold**) is presented below.

1. *Why are Seeps 1 and 2 being sampled for Hexavalent Chromium and when did the Operator begin sampling for this specific analyte?*

   Seeps 1 and 2 were inadvertently sampled/analyzed for Surface Water Parameters which includes Hexavalent Chromium as an analyte. The Seep 1 & 2 samples were sampled/analyzed for Surface Water Parameters in May & June, but the issue has been corrected in July. CC&V will ensure that Seep 1 & 2 are sampled and analyzed as Groundwater per the Grassy Valley QAPP.

2. *Does the Operator have a reason as to why the Hexavalent Chromium results are so different between the two seeps, <0.0050 vs 0.0879 mg/L?*

   Seeps 1 and 2 are spatially separated expressions of pore water from the ECOSA Facility which are being influenced differently from distinct bodies of overburden material. The analytical report also noted that the reported values for Hexavalent Chromium for Seep 1 and Seep 2 had to be estimated

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due to the presence of interferents. The lab notes are included in Attachment A.

It is also important to note that Regulation 41 – The Basic Standards for Groundwater does not list a standard specific to Hexavalent Chromium. The Chromium standard is based on the total concentration of both trivalent and hexavalent forms of dissolved chromium, which are similar between Seep 1 and Seep 2.

3. *On the seep field sheets it is noted that zinc acetate is being used, please clarify how and why zinc acetate is being used.*

   Zinc acetate is utilized as a preservative for the sulfide analysis (Standard Method 4500 SD). It is added to the 250 mL sample bottle that is sent to the lab for sulfide analysis as per the sampling requirements in SM 4500 SD.

4. *For future submittals please note on the field sheets where duplicates and other QA/QC samples are collected.*

   Acknowledged. CC&V will document the collection of QA/QC samples on the field sheets.

Should the Division required further information regarding the above responses, please do not hesitate to contact Antonio Matarrese at 719-851-4185 or Antonio.Matarrese@Newmont.com or me at 719-851-4048 or Katie.Blake@Newmont.com.

Sincerely,

DocuSigned by:
Katie Blake
5A3D013B629844B...

Katie Blake
Sustainability & External Relations Manager
Cripple Creek & Victor Mine

EC: M. Cunningham – DRMS
E. Russell - DRMS
K. Blake - CC&V
J. Gonzalez – CC&V

File: *"C:\Users\19012214\Newmont USA Limited\CC&V – S&ER Environmental - Environmental Compliance\Water\DRMS\Grassy Monthly\5 - May 2023\DRMS Add'l Info\Final"*

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Attachment A

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Work Order: **X3E0267**
Reported: 02-Jun-23 10:24

Notes and Definitions

D1	Sample required dilution due to matrix.
D2	Sample required dilution due to high concentration of target analyte.
E12	The reported value is estimated due to the presence of interferents.
H1	Sample analysis performed past holding time.
H3	Sample was received and/or analysis requested past holding time.
H5	This test is specified to be performed in the field within 15 minutes of sampling; sample was received and analyzed past the regulatory holding time.
J	The reported value is less than the Reporting Limit (MRL, CRDL) but greater than or equal to the MDL. Results closer to the MDL have increased relative uncertainty.
M1	Matrix spike recovery was high, but the LCS recovery was acceptable.
M4	The analysis of the spiked sample required a dilution such that the spike recovery calculation does not provide useful information. The LCS recovery was acceptable.
N1	See case narrative.
Q5	Sample was received with inadequate preservation, but preserved by the laboratory.
Q5C	After two pH adjustments, the method-specified pH was not achieved.
R2B	RPD exceeded the laboratory acceptance limit.
U	Less than MDL.
LCS	Laboratory Control Sample (Blank Spike)
RPD	Relative Percent Difference
UDL	A result is less than the detection limit
0.30R>S	% recovery not applicable; spike level is less than 30% of the sample concentration
<RL	A result is less than the reporting limit
MRL	Method Reporting Limit
MDL	Method Detection Limit
N/A	Not Applicable