COLORADO
Division of Reclamation, Mining and Safety
Department of Natural Resources

September 26, 2023

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

RE: Additional Information Required No. 2; Second Quarter 2023 Surface Water and Groundwater Monitoring Report, Cresson Project, Permit No. M-1980-244

Dear Ms. Smith,

On September 21, 2023, the Division of Reclamation, Mining and Safety (Division/DRMS) received your responses to the Division's Additional Information Required, dated August 22, 2023, for the Second Quarter 2023 Surface Water and Groundwater Monitoring Report. After review of the responses the Division has the following list of items that need to be addressed by the Operator.

1. The Division was unable to verify where it is indicated on Stream Classification Table #24 (COARUA24) that the Table Value Standards (TVS) from Regulation 31 (Reg. 31) is to be utilized. However, in the footnotes on the page where Table #24 is located it references Section 32.6 for further details on applied standards. The Division reviewed Section 32.6(3) Table Value Standards and it appears these standards are more appropriate. If the Operator's opinion is the Reg. 31 TVS calculations are more appropriate please provide a discussion as to why. Finally, please recalculate the TVS values using the specified Reg. 32 TVS values, if they differ from Reg. 31 TVS values, and resubmit. If the Reg. 32 TVS equations are not different from the Re. 31 TVS equations please clearly state that is the case.

2. The Tables provided in Appendix 1 need additional clarification. Why are sample result values missing in the tables for GV-02 and GV-03? Where calculated values are above a standard it needs to be indicated either by highlighting or text bolded to clearly reflect an exceedance. A footnote should be added to the tables to indicate where estimated or unknown sample results are at or above a calculated standard value, e.g. Cyanide (Free), Mercury, and Nitrite. Update and resubmit the tables.

3. The Division concurs that there is no specific statement to monitor purge volume within the USEPA Low-Flow Sampling Procedure. However, there is a requirement to monitor purge rate. Purge rate aids in determining the following "The final purge volume must be greater than the stabilized drawdown volume plus the pump's tubing volume. If the drawdown has exceeded 0.3 feet and stabilizes, calculate the volume of water between the initial water level and the stabilized water level. Add the volume of the water which occupies the pump's tubing to this calculation. This combined

volume of water needs to be purged from the well after the water level has stabilized before samples are collected."(USEPA, 2017). In the original USEPA Low-Flow Sampling Procedure, 1996, section VI Documentation it is stated at a minimum documentation should include flow-rate and volumes extracted. For future sampling events the volumes extracted during monitoring well sampling need to be provided.

4. It is inappropriate to reference a site specific NPL concentration that is currently under review in an ongoing Technical Revision, TR-136. Please remove the references to those concentrations. For the locations mentioned provide updated graphs that demonstrate the exceedances are within the historic analytical range for those specific analytes.

This concludes the Division's Adequacy Review No. 2 of the Second Quarter 2023 Surface Water and Groundwater Monitoring Report. The Division reserves the right to further supplement this document with additional items and/or details as necessary.

Please respond to these items within 30 days of the date on this letter, by **October 26, 2023**

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.

Sincerely,

Patrick Lennberg
Environmental Protection Specialist

ec: Katie Blake, CC&V
Johnna Gonzales, CC&V
Tony Matarrese, CC&V
Michael Cunningham, DRMS
Elliott Russell, DRMS
Tim Cazier, DRMS
Nikie Gagnon, DRMS
Jared Ebert, DRMS