



November 16, 2023

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

RE: Division Adequacy Review; Technical Revision 139 (TR-139) Water Monitoring Quality Assurance Project Plan (QAPP) and Amendment 13 Exhibit G Update, Permit No. M-1980-244

Dear Ms. Smith,

On October 17, 2023, the Division of Reclamation, Mining and Safety (Division/DRMS) received your request for Technical Revision 139 (TR-139). After review of TR-139 the Division has the following list of items that need to be addressed by the Operator.

1. QAPP Table 2.1.1 should be updated to reflect sample locations that are currently being monitored on a monthly basis. Additionally, monitoring wells that are points-of-compliance wells should be clearly indicated.
2. Table 2.2.1 Surface Water Monitoring Sites and Figure 2.2.1 Surface Water Monitoring Location Map both need to be updated to include GV-06.
3. Table 2.2.1 Surface Water Monitoring Sites should be updated to reflect locations that are currently being sampled monthly.
4. Section 4.5, Calibration, it is stated that all calibration data will be documented. Please revise to include a statement as to where this data will be documented.
5. Section 6, Sample Types, a frequency of duplicate sample collection needs to be proposed for each media sampled, e.g. one duplicate collected per 20 primary samples with no less than one duplicate sample collected for each media sample per sampling event.
6. Section 8.5, Well Sampling, the water quality indicator parameters used for purging and stabilization are temperature, specific conductivity, and pH. However, US EPA indicator parameters for groundwater sampling, are pH, specific conductivity, dissolved oxygen concentration, oxidation-reduction potential, temperature and turbidity. Please update the QAPP to monitor for the US EPA indicator parameters.



7. Section 8.5, Well Sampling, the stabilization criteria for the indicator parameters needs to be updated match those recommended by the US EPA; Turbidity – 10% for values greater than 5 NTU or if three Turbidity values are less than 5 NTU, Dissolved Oxygen – 10% for values greater than 0.5 mg/L or if three consecutive values are less than 0.5 mg/L, Specific Conductance – 3%, Temperature – 3%, pH +/- 0.2 standard units.
8. Updates completed in the QAPP should be carried over to Exhibit G where appropriate.

This concludes the Division's Adequacy Review of TR-139. The Division reserves the right to further supplement this document with additional items and/or details as necessary.

On November 15, 2023 the Division received your extension request to extend the decision date for TR-139 from November 16, 2023 to December 18, 2023. **The Division hereby approves the extension request to December 18, 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
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