



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

December 29, 2023

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

**RE: Division Adequacy Review No. 2; 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 December 14, 2023, the Division of Reclamation, Mining and Safety (Division/DRMS) received your responses to the Division's Adequacy Review letter dated November 16, 2023 for Technical Revision 139 (TR-139). After review of the responses the Division has the following list of items that need to be addressed by the Operator.

1. Section 5, Sample Frequency, states one well and one surface water location will have a duplicate sample collected per quarter. In ASTM-D7069 Field Quality Assurance in a Groundwater Sampling Event it is stated *it is a widely accepted practice to collect one set of duplicates for every ten samples or at least one set per sampling event if less than ten samples are collected*. Another common industry practice is to collect one duplicate sample for every twenty primary samples collected. There is a potential that during quarterly groundwater sampling more than 20 wells could be sampled in an event. The Division requires a sampling frequency to be indicated.
2. Updates completed in the QAPP should be carried over to Exhibit G where appropriate.

This concludes the Division's Adequacy Review No. 2 for TR-139. The Division reserves the right to further supplement this document with additional items and/or details as necessary.

The decision date for your application is set for **January 18, 2024**.

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,

A handwritten signature in blue ink, appearing to read "Patrick Lennberg". The signature is fluid and cursive, with the first name "Patrick" written in a larger, more prominent script than the last name "Lennberg".

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