

January 23, 2024

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

**Re: Additional Information Required No. 2, Grassy Valley Groundwater and Surface Water  
Monitoring Report September 2023; Permit No. M-1980-244**

Dear Ms. Smith:

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

1. From the responses provided, the Operator has collected analytical samples from locations, which are not part of a routine sampling program and reported to the Division, during investigations of the ECOSA Seep and impacts to the Grassy Valley hydrologic balance. The results of these samples have not been readily provided to the Division.

The Operator's response indicates that samples have been collected from OSABH-17 and GVMW-7A/B. While other locations OSABH-18, GVMW-4 and GVMW-15 have been monitored to be dry. Provide the most recent and historic, dating as far back as 2021 if available, analytical data collected from OSABH-17 and GVMW-7A/B so the Division may evaluate the potential impacts to groundwater from seepage at the ECOSA.

Attachment 1 indicates that analytical samples have been collected from GVMW-10. Provide a statement whether or not samples have been collected from this location during investigations of the ECOSA Seep and Grassy Valley beginning in 2021. As above, provide the relevant analytical data.

2. In response to Item 2, the Operator states they met the commitment to develop and submit a long term plan for the ECOSA, which was later withdrawn at the request of the Division. Please note, TR-138 was considered to not be a long term plan per the TR-132 commitment and exceeded the scope of a technical revision. The Division was going to deny TR-138 as submitted,



however the Operator chose to withdraw the application to preempt the denial. As no long term plan has been approved, the commitment has not been met by the Operator. Furthermore, TR-138 lacked specific details and information which now appears to have been available following the initial data gap report from WSP Golder (Golder) in December 2021, including the geophysical survey of Grassy Valley performed by Golder in August 2022. To date the Operator has not provided the Division with the details of the investigation's findings.

Provide a copy of the initial WSP Golder report from December 2021, and any copies of additional follow-up reports from WSP Golder and others pertaining to the investigations of the ECOSA seepage and impacts to the hydrologic balance in Grassy Valley, including the July 2023 geophysical investigation.

3. Provide the appropriate DWR well abandonment documents GVMW-4B and -15C. The Division reviewed the permit file and could not find documentation that approved the abandonment of these wells, provide the missing documentation. If no documentation exists provide a schedule to replace the abandoned monitoring wells.

Provide the well construction summaries for GVMW-4A and -15A and include with them the most recent water level measurements for each well.

4. A replacement surface water sample location for GV-01, GV-01A, needs to be established between its former location and GV-02 2,200 feet downstream. Provide the coordinates for the new GV-01A sampling location. This location is to be monitored monthly along with the other Grassy Valley surface water locations.

The due date to respond to these items is 30 days from the date on this letter, by **February 22, 2024**. The Division reserves the right to further supplement this document with additional items and details as necessary.

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, CC&V

Anthony Matarrese, CC&V  
Johnna Gonzalez, CC&V  
Elliott Russell, DRMS  
Michael Cunningham, DRMS  
Tim Cazier, DRMS  
Nikie Gagnon, DRMS