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

February 9, 2024

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

Re: Additional Information Required, Fourth Quarter (4th) 2023 Groundwater and Surface Water Monitoring Report; Permit No. M-1980-244

Dear Ms. Smith:

On January 31 2024, the Division of Reclamation, Mining and Safety (Division/DRMS) received the 4th Quarter 2023 Monitoring Report for surface water and groundwater samples collected at the Cresson Project, M-1980-244. After review of the submission the Division has an additional items that need to be addressed or clarified.

1. During review of the submittal it was determined the Operator did not include SGMW-8 and WCMW-6 in the narrative section discussing why samples were not collected from certain wells. Both wells are point-of-compliance (POC) wells for Maize Gulch and Wilson Creek, respectively. The Division expects the narrative to be an accurate and concise description of the sampling event and results. Omission of these types of details result in lengthy review times by the Division on what should be a routine report. Provide an updated narrative that specifically addresses if and when each POC well, for all basins, was sampled. If a POC well was not sampled a reason must be provided. This narrative is expected to be included in every quarterly report in the future. Additionally, a summary table must be provided, and included if all future reports, listing each sampling location (grouped according to media sampled), date sampled, a clear indication if a sample was collected and notes (reason for no sample collected or location and type of QA/QC sample).

   It is the Division's expectation that all POC well locations are sampled on a quarterly basis according to the approved monitoring plan. If a location cannot be accessed during the routine quarterly sampling event then every effort shall be made to sample the location later in the quarter.

2. The narrative incorrectly states WCSW-1 was dry during the quarter. According to the field sheet WCSW-1 was not visited during the quarter because of a road wash out. Update this section to accurately reflect what is on the field sheets.

3. The graphs at the end of the report need to be updated to include all currently approved POC wells.

4. Provide the missing QA/QC section referenced in the Results section of the narrative.

5. On page 2, first complete paragraph, it is stated "Of the aforementioned wells, GV-06 is the only point of compliance location." This is an incorrect statement that needs to be corrected.

6. On page 2, first complete paragraph, it is stated "There have been no exceedances observed at the new point of compliance wells GVMW-26A or GVMW-26B during the third quarter." This statement needs to be updated to accurately state which quarter the report is for.

7. In the 3Q2023 it was noted no sample was collected from CRMW-3B due to issues with the pump. Provide the date when the pump went out of service and the date when the new pump was installed and when it returned to service. Additionally, please provide description as to why the pump failed.

8. The Appendix A maps need to be updated to clearly reflect the point-of-compliance locations for each basin.

9. The appropriate maps need to be updated with the surface water location GV-06.

10. During the November sampling event arsenic was detected above the calculated chronic standard for the associated stream segment at GV-06. This is the first time arsenic has been detected at this location for the period of record. The arsenic exceedance appears to be related to the on-going ECOSA seep problem and correlates to the highest measured concentrations of arsenic in GVMW-25. On January 25, 2024, the Division was provided the December 2023 results of the Grassy Valley monthly monitoring program associated with the ECOSA seep; the Operator declared the site frozen on December 6 and no sample was collected. In the area of GV-06 the stream is gaining and if flow is occurring beneath a frozen layer of ice a sample shall be collected rather than being declared frozen and no sample collected.

    Within in one week of the date of this letter, the Operator shall determine if flow is occurring beneath the ice at GV-06. If flow is occurring, the Operator will remove the ice and collect a sample. The sample shall have a 24-hour rush analysis performed and the results provided to the Division no later than 48 hours after sample collection. The results will be compared to

the appropriate calculated stream segment standards. The Division is to be notified no sooner than 24 hours of when GV-06 will be visited and then notified again whether a sample was collected. If no sample is collected, the site shall be revisited on a weekly basis until a sample can be collected.

Additionally, provide a time series graph of all constituents that have exceeded a standard for GV-06 for the period of record. The Operator shall inform the Division if a sample was collected during the January 2024 Grassy Valley monthly sampling event. If a sample was collected the Operator shall provide the results of the sample within a week of receiving this letter.

11. Field sheet for CRMW-3A, the actual volume pumped has a line through it. Why is the volume not completed given the flow rate and time purged? Confirm the volume removed from the well.

12. Field sheet CRMW-5B, the beginning water level (WL) was 28 feet yet the drawdown column reports 0 feet drawdown at a WL of 28.4 feet. At the bottom of the form the drawdown greater than section has "N" circled. Clarify these discrepancies. Provide the calculation that appears to have been completed to determine the required pump volume following stabilization.

13. Field sheet CRMW-5C, the drawdown portion of the field sheet is incorrectly completed. Drawdown is a measure of the lowering of the water level from its initial measurement. The initial drawdown entry is correct but the following readings reference this initial measurement taken during pumping which is incorrect. The entry at the bottom for drawdown greater than 0.33 ft is incorrectly completed. Clarify these discrepancies. Provide the calculation that appears to have been completed to determine the required pump volume following stabilization.

14. Field sheet CRMW-5D, the drawdown portion of the field sheet is incorrectly completed. The initial drawdown entry is correct but the following readings reference this initial measurement taken during pumping which is incorrect. Clarify this discrepancy and provide the calculation that was used to determine the required pump volume following stabilization.

15. Field sheet GVMW-8A, the drawdown portion of the field sheet is incorrectly completed. Clarify this discrepancy and provide the missing calculation for the actual volume pumped.

16. Field sheet GVMW-8B, the drawdown portion of the field sheet is incorrectly completed. Clarify this discrepancy and verify that 8 gallons were removed to complete the three volume purge method. It appears from the field sheet setup the 8 gallons removed should be indicated in the space for actual volume pumped, comment required.

17. Field sheet GVMW-22A, the drawdown portion of the field sheet is incorrectly completed. Clarify this discrepancy and provide the calculation used to determine the required pump volume following stabilization.

18. Field sheet GVMW-22B, the drawdown portion of the field sheet is incorrectly completed. Clarify this discrepancy and provide the calculation used to determine the required pump volume following stabilization.

19. Field sheet PGMW-5, the drawdown portion of the field sheet is incorrectly completed. Clarify this discrepancy and provide the calculation used to determine the required pump volume following stabilization.

20. Field sheet SGMW-6B, the drawdown portion of the field sheet is incorrectly completed and the part indicating if drawdown was greater than 0.33 feet was incorrectly completed. Clarify these discrepancies and provide the calculation used to determine the required pump volume following stabilization.

21. Field sheet SGMW-8, this well had 5 feet of water in the screened interval. Provide an explanation why the well was not purged to dryness, revisited to measure recovery and sampled according to the QAPP? SGMW-8 is the point-of-compliance well for the associated drainage and every effort should be made to either collect a sample or definitively determine a sample cannot be collected.

22. Field sheet VIN-2A, the drawdown portion of the field sheet is incorrectly completed. Clarify this discrepancy and provide the calculation used to determine the required pump volume following stabilization.

23. Field sheet WCMW-3, the drawdown portion of the field sheet is incorrectly completed. Clarify this discrepancy and provide the calculation used to determine the required pump volume following stabilization.

24. Field sheets WCMW-6 and WCSW-1 indicates the road has been washed out and a sample sites were not visited to collect a sample. Provide an update of the current road condition. In the event the road is still not accessible, please provide the plan and timeframes to reestablish access to ensure compliance with sampling of the point-of-compliance well and surface water locations.

25. The laboratory data reports need to be updated to clearly indicate (highlighted, bolded font, or other) where results exceed a standard.

Please respond to these items, with the exception of item #10, within 30 days of the date on this letter, by **March 10, 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.

Sincerely,

Patrick Lennberg
Environmental Protection Specialist

cc: Katie Blake, CC&V
Anthony Matarrese, CC&V
Johnna Gonzalez, CC&V
Josh Adams, CC&V
Elliott Russell, DRMS
Michael Cunningham, DRMS
Tim Cazier, DRMS
Nikie Gagnon, DRMS
Hunter Ridely, DRMS