



April 11, 2024

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

Re: Adequacy Review, Revision No. TR142, Cresson Project, Permit No. M-1980-244

Dear Lori Smith,

On March 13, 2024, the Division received the request for a Technical Revision (TR142) for the Cresson Project, File No. M-1980-244, proposing to partially backfill the South Cresson Pit. During the review of the material submitted, the Division determined that the following items need to be adequately addressed before TR142 can be considered for approval. Please respond to this Adequacy Review with the requested information and summarize each response to the numbered items below, in a cover letter titled "Adequacy Review Responses TR142, M-1980-244".

1. The maps submitted with the request for TR142 do not meet the requirements of Rule 6.2. Please submit revised maps which comply with Rule 6.2.1(2)(a), (b), and (c). Please be sure to make all haul roads, dump sites, and other features visible on these maps.
2. A revised set of Amendment (AM-13) Exhibit F - Reclamation Plan maps are required. Please update these maps to show the proposed final reclamation for the South Cresson Backfill area.
3. Based on the application materials, it is unclear whether this will be an ongoing operation, receiving backfill material as active pits progress and new pits are excavated, or this is a one-time modification and the resulting topography including the backfill material will be final. Please clarify if backfill operations in the South Cresson Pit will be continuous through the submission of a future permit revision or if this is to be considered its final configuration.
4. Additionally, if the backfill operations are not the final configuration for the facility, please identify if backfill operations will be conducted in support of the final reclamation of the area, or if it is being conducted with the intention of utilizing the area for surface facilities. If future surface facility development is contemplated the material will be treated as structural backfill. If material is not handled in a manner consistent with structural backfill, the area will be precluded from any future surface facility development.
5. The application materials and supporting figures state that the backfilling will be completed in lifts that will vary in height, depending on the logistics of truck hauling, geographic locations relative to the mine areas and overburden removal scheduling. Please provide and commit to a maximum lift thickness, and in conjunction with Item 4 of this review, if the backfill is to be considered structural for future facilities development, please provide details on any average



material size and compaction that will occur in the backfill area. Additionally, please provide a QA/QC plan sufficient to monitor the compaction and relative density of the backfill material.

6. As previously committed in AM11 and AM13, all accessible haul roads and pit floors will receive growth medium. The western side of the 'Steep High-wall Area with No Growth Media' polygon, between the South Cresson Pit and VLF1 is an accessible haul road. Additionally, because backfill will be placed via truck placement in lifts, this will also be considered an accessible area. Therefore, the Division will require a commitment to placing growth media in this area. Please also refine the 'Steep High-wall Area with No Growth Media' polygon to reflect these areas of accessibility and to show more precisely where a steep high-wall area will remain.
7. Through adequacy review conducted for Amendment 13 (AM-13), CC&V provided calculations and justification that sufficient growth media is stored onsite to replace 6 inches at a minimum of growth media across areas needing reclamation. Since replacement of growth media is required for all accessible areas (as referenced in Item No. 4), please provide the source of the additional growth media for the accessible areas created through this TR request. The Division recognizes there was previously an accessible portion of the South Cresson Pit to receive growth media, however TR142 increases the total area that will need growth media. Will additional topsoil need to be imported onsite?
8. Please discuss if the backfilled area within the South Cresson Pit will now qualify for tree planting in accordance with the approved Reclamation Plan.
9. The Division will calculate a reclamation bond cost estimate based on the responses to this adequacy letter and will then evaluate the TR142 cost estimate for sufficiency. You will be provided a copy of that reclamation cost estimate for review before the decision date if the Division's estimate is more than the TR142 cost estimate. *No further response needed.*

This concludes the Division's adequacy review of TR142. This letter shall not be interpreted to mean that there are no other technical inadequacies in your revision as other issues may arise when additional information is supplied. Please be advised TR142 may be deemed inadequate, and the request may be denied on **May 10, 2024**, unless the above-mentioned adequacy review item is addressed to the satisfaction of the Division. If more time is needed to respond, the Division can grant an extension of the decision date following a request to do so by the Operator.

Sincerely,
Hunter C. Ridley



Environmental Protection Specialist
CC: Zach Trujillo, DRMS

Ec: Katie Blake, CC&V
Johnna Gonzalez, CC&V

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Elliott Russell, DRMS

Lucas West, DRMS