STATE OF COLORADO

Lennberg - DNR, Patrick <patrick.lennberg@state.co.us>

# RE: [EXTERNAL] Re: CC&V Response - Grassy Valley Dec

1 message

**Joshua Adams** <Joshua.Adams@newmont.com> Fri, Apr 19, 2024 at 9:09 AM
To: "Lennberg - DNR, Patrick" <patrick.lennberg@state.co.us>, Norma Townley <Norma.Townley2@newmont.com>
Cc: Elliott Russell - DNR <elliott.russell@state.co.us>, Katie Blake <Katie.Blake@newmont.com>, Johnna Gonzalez <Johnna.Gonzalez@newmont.com>, Zach Trujillo - DNR <zach.trujillo@state.co.us>

Patrick,

Apologies for the mix up. Please see the attached responses for Additional Information Required No.2 - Grassy Valley Monthly Monitoring December 2023. Let us know if you have questions. Thank you!

Newmont
CRIPPLE CREEK & VICTOR

**Josh Adams, PG**

SITE WATER COORDINATOR

Cripple Creek & Victor Gold Mining Company

Victor, CO 80860

O 719.851.4260

M 719.323.0438

NEWMONT.COM

**From:** Lennberg - DNR, Patrick <patrick.lennberg@state.co.us>
**Sent:** Friday, April 19, 2024 7:31 AM
**To:** Norma Townley <Norma.Townley2@newmont.com>
**Cc:** Elliott Russell - DNR <elliott.russell@state.co.us>; Katie Blake <Katie.Blake@Newmont.com>; Johnna Gonzalez <Johnna.Gonzalez@newmont.com>; Joshua Adams <Joshua.Adams@newmont.com>; Zach Trujillo - DNR <zach.trujillo@state.co.us>
**Subject:** [EXTERNAL] Re: CC&V Response - Grassy Valley

Good Morning,

The response attached to this email is the original response from February 29, 2024 and appears to have been accidentally re-submitted as the response to the Division's second request for additional information.

Please submit the correct response as soon as you are able.

Thank you,

Patrick

On Thu, Apr 11, 2024 at 3:17 PM Norma Townley <Norma.Townley2@newmont.com> wrote:

> Patrick, attached please find our response to Additional information Grassy Valley. If you have any questions please reach out to Joshua.Adams@Newmont.com or Katie.Blake@Newmont.com. Thank you.
>
> Newmont
> CRIPPLE CREEK & VICTOR
>
> ***Norma Townley***
>
> Business Assistant | Newmont | T 719-851-4255
>
> Newmont
>
> Cripple Creek & Victor Gold Mine
>
> PO Box 191
>
> 100 N.3rd Street
>
> Victor CO 80860
>
> www.newmont.com
>
> Email: Norma.Townley2@Newmont.com
>
> **Office hours Monday-Thursday, 6:00 AM-4:30PM MT**
>
> Please consider the environment before printing this e-mail

--

**Patrick Lennberg**

**Environmental Protection Specialist**

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

P 303.866.3567 x8114 | F 303.832.8106

Physical Address: 1313 Sherman Street, Room 215, Denver, CO 80203

**Address for FedEx, UPS, or hand delivery:**

1001 E 62nd Ave, Denver, CO 80216

Patrick.Lennberg@state.co.us | https://drms.colorado.gov

**CC&V Response - AddInfoNeeded#2GrassyValleyMonitoring_Dec2023 (1) (1).pdf**
909K

Newmont
NORTH AMERICA

Cripple Creek & Victor
Gold Mining Company
P.O. Box 191
100 North 3rd Street
Victor, Colorado 80860

P 719.689.2977
F 719.689.3254
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SENT VIA ELECTRONIC COMMUNICATION

April 11, 2024

Mr. Patrick Lennberg
Environmental Protection Specialist
Colorado Department of Natural Resources
Division of Reclamation, Mining and Safety
Office of Mined Land Reclamation
1313 Sherman Street, Room 215
Denver, Colorado 80203

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

Dear Mr. Lennberg:

Cripple Creek and Victor Gold Mining Company (CC&V) received the Division of Reclamation, Mining, and Safety's (DRMS) *Additional Information Required No. 2, Grassy Valley Groundwater and Surface Water Monitoring Report December 2023*; Permit No. M-1980-244. CC&V has reviewed the additional information required in the letter dated March 13, 2024 from DRMS and has prepared the following responses for each comment. The DRMS comment (**in bold**) and CC&V's corresponding response (*in italics*) is presented below.

1. **Provide an update on the investigation into wells GVMW-4A and GVMW-15A, have samples been collected and what were the results of the pumping? If samples were collected provide the results.**

   **If the Operator has not performed the investigation provide a time frame for when it will occur and commit to informing the Division when the field investigation is complete.**

   **Has the Operator acquired a water level meter that can gauge GVMW-15C? If so, please provide that information and if not, when is that equipment expected?**

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Victor, Colorado 80860

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F 719.689.3254
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*After investigation, the total depth in GVMW-4A was approximately 365 feet below ground surface (bgs) during the March sampling event which is consistent with the documentation for this well. A sample was collected in March 2024 from this well and field and laboratory analytical results will be provided in the March 2024 Monitoring Report.*

*Total depth in GVMW-15A was recorded as 682 feet bgs during the March sampling event. A sample was collected from this well in February 2024 (results provided in the monthly report) and results from the sample collected in March 2024 will be provided in the March 2024 monitoring report.*

*CC&V did acquire a 1000' water level indicator and inspected GVMW-15C on March 13 2024, at this inspection CC&V recorded this well as dry at 440 feet bgs. Investigation of this well is documented in the February 2024 Monitoring report.*

2. **In response to the Division's question about the Operator not sampling GVMW-7B the Operator provides a quote from the USGS National Field Manual for the Collection of Water Quality Data Book 9 Chapter A4 Section 4.2.2 that recommends against sampling wells with 5 feet or less water in them because of detritus in the bottom of the well may bias analytical results. What the Operator omitted from this citation is the following "Any reported interpretations of chemical analyses when sampling under such conditions must be clearly qualified and the well conditions documented." Clearly, there is a USGS procedure in place to address sampling a well with less than 5 feet of water in it and the Operator did not follow it. The majority of the sample collected from GVMW-7B is analyzed for dissolved constituents which requires field filtering water to remove most of the non-dissolved particles from the water sample mitigating potential impacts from the detritus.**

   **Regardless of the incomplete USGS citation the approved QAPP for Grassy Valley clearly defines the procedure for sampling a well like GVMW-7B and the Operator did not follow the approved plan. Furthermore, if there is a concern about detritus in the bottom of the well the Operator can redevelop the well to remove any debris that may have accumulated over time or may potentially bias analytical results.**

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100 North 3rd Street
Victor, Colorado 80860

P 719.689.2977
F 719.689.3254
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**It is noted the Operator has sampled GVMW-7B six times since March 2023. Provide the GVMW- 7B field sheets for samples collected on March 14, July 19, September 26, October 17 and November 13, 2023**

*The referenced USGS citation contains multiple references that discourage sampling low-yield and low recovery wells. EPA low flow procedures also advise against sampling in scenarios when the depth to water within a well is below the screened interval. These precautions are to avoid biasing the samples and avoiding future misinterpretation of the results. CC&V believes that the currently approved QAPP needs to be revised to address these particular situations and would like to reach an agreement with the Division on how low-yield and small water column wells can be addressed moving forward. The requested field sheets are included as Attachment 1.*

3. **For the list of wells below, provide a summary table that lists each well diameter (inches), well location (x, y in decimal degrees), ground surface elevation, top of casing elevation, total depth (feet below ground surface) and screened interval (feet below ground surface).**

| | | | |
|---|---|---|---|
| **Grassy Valley** | GVMW-8A<br>GVMW-8B<br>GVMW-22A<br>GVMW-22B<br>GVMW-25 | GVMW-4A, GVMW-4B<br>GVMW-6A<br>GVMW-7A, GVMW-7B<br>GVMW-10<br>GVMW-15A, GVMW-15B<br>GVMW-15C, GVMW-21A<br>GVMW-23A, GVMW-23B<br>GVMW-24A, GVMW-24B<br>OSABH-12<br>OSABH-14<br>OSABH-16<br>OSABH-17<br>OSABH-18 | GVPZ1<br>GVPZ2<br>GVPZ3<br>GVPZ4 |

*Requested information is included in Attachment 2.*

4. **Provide an explanation on where the sediment built up to prevent sampling of GVMW-24A and how a similar situation will be avoided in the future**

*Sediment build up is occurring within the water column itself. Sediment laden water is blocking the intake of our pumps and preventing the pumping of water, as well as causing damage to our sampling equipment. CC&V plans to redeveloped the well in April 2024 to alleviate these conditions. After the well is redeveloped, CC&V will either low-flow sample the well or conduct*

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Gold Mining Company
P.O. Box 191
100 North 3rd Street
Victor, Colorado 80860

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F 719.689.3254
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*a purge and return (via hand bailing) to attempt to collect samples in April 2024.*

5. **The Division agrees that graphs are intended to be a depiction of trends in concentrations over time. However, those trends need to be accurate or at the very least provide clear information. In the case of Thallium in GVMW-25, there are numerous spikes in the graphs and as depicted lead the reviewer to believe that Thallium has actually been detected when in fact it is a product of routine laboratory dilution of the sample. A reviewer has to take additional time to locate the lab data sheet for that analyte to determine if it was actually detected or follow up with an adequacy question inquiring about the detection. The Operator has an opportunity to update graph symbols or provide a brief narrative to address these dilution instances.**

*As shown in the February 2024 Grassy Valley Monitoring Report, CC&V provided a narrative to address dilutions and other qualifications within the discussion section of the report. This will be the format moving forward.*

Should the Division required further information regarding the above responses, please do not hesitate to contact Josh Adams at 719-323-0438 or Joshua.Adams@Newmont.com or me at 719-851-4048 or Katie.Blake@Newmont.com.

Sincerely,

p.p. DocuSigned by: Johnna Gonzalez 3AF21101E9CC41A...

Katie Blake
Sustainability & External Relations Manager
Cripple Creek & Victor Mine

EC: M. Cunningham – DRMS
E. Russell - DRMS
K. Blake - CC&V
J. Gonzalez – CC&V
J. Adams – CC&V

Newmont
NORTH AMERICA

Cripple Creek & Victor
Gold Mining Company
P.O. Box 191
100 North 3rd Street
Victor, Colorado 80860

P 719.689.2977
F 719.689.3254
newmont.com

# Attachment 1

**Newmont Mining Co**
**Cripple Creek & Victor Gold Mining Co**

## Groundwater Sampling Log

**Location :** Grassy valley **Date:** 3/14/23

**Technician:** P. Barela / B. Doering **Quarter:** 1

**Static Water Level (DTW):** 42.5 **Well ID:** GVMW 7B

**Well Depth:** 50'

**Is well Dry?** No **If so Dry at:** ____ **feet**

| Time | Drawdown (ft) | pH (S.U.) | Cond. (uS/cm) | Temp. (°C) | Notes |
|---|---|---|---|---|---|
| 43 10:15 | 0.5 | 7.08 | 1091 | 6.1 | .5 L per min |
| 44.3 10:28 | 1.8 | 7.33 | 1083 | 7.3 | |
| 45.2 10:35 | 2.7 | 7.35 | 1086 | 9.2 | |
| 45.9 10:40 | 3.41 | 7.36 | 1086 | 9.1 | |
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**Sample Method:** Low Flow **Rate (gpm):** ~.125 **Time Start:** 10:15 **Time End:** 10:40

| Final Parameters | Stabilization Guidance | | Met? | Comments |
|---|---|---|---|---|
| pH | 7.36 | 0.1 | (Y)/N | |
| Conductivity | 1086 | 3% | (Y)/N | |
| Temp© | 9.1 | 10% | (Y)/N | |
| Final H2O level | 45.9 | feet | | |

**O/G visible:** Y/(N) **Turbid?** Y/(N)

**Equipment Decontaminated:** (Y)/N

**Decontamination procedure used:** Triple rinse with liquinox. Deploy Pump was rinse. New tubing and Filter used for ~~Peri~~ Parasonic Pump

**Signature:**

**Weather:** Mostly clear, cold, brizy

**Newmont Mining Co**
**Cripple Creek & Victor Gold Mining Co**

# Groundwater Sampling Log

**Location :** Grassy Valley **Date:** 7/19/23

**Technician:** P. Barela **Quarter:** 3

**Static Water Level (DTW):** 31.6 **Well ID:** GVMW-7B

**Well Depth:** 50

**Is well Dry?** NO **If so Dry at:** — **feet**

| Time | Drawdown (ft) | pH (S.U.) | Cond. (uS/cm) | Temp. (°C) | Notes |
|---|---|---|---|---|---|
| 9:35 | | 7.63 | 1172 | 7.2 | started Pumping 6.34 L/P |
| 43.1 9:40 | 11.5 | 7.30 | 1176 | 7.41 | |
| 48.5 9:45 | 16.9 | — | — | — | Dried out / stopped Pumping |
| | | | | | |
| | | | | | |
| | | | | | |
| 38.3 11:25 | | 7.33 | 1164 | 7.1 | Collected sample. |
| | | | | | |
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**Sample Method:** Purge & return **Rate (gpm):** ~1.67 **Time Start:** 9:35 **Time End:** 11:25

| Final Parameters | Stabilization Guidance | | Met? | Comments |
|---|---|---|---|---|
| pH | 7.33 | 0.1 | Y/N | |
| Conductivity | 1164 | 3% | Y/N | |
| Temp© | 7.1 | 10% | Y/N | |
| Final H2O level | 38.3 | feet | | |

O/G visible: Y/(N) Turbid? Y/(N)

Equipment Decontaminated: (Y)/N

Decontamination procedure used: Triple rinse w/ liquinex ; Pump & Sounder use new tubing & filter

Weather: sunny, hot

Signature:

**Newmont Mining Co**
**Cripple Creek & Victor Gold Mining Co**

## Groundwater Sampling Log

**Location :** Grassy valley **Date:** 9/26/23

**Technician:** P. Barela **Quarter:** 3

**Static Water Level (DTW):** 33.3 **Well ID:** GVMW-7B

**Well Depth (TD):** 50

**Is well Dry?** NO **If so Dry at:** — feet

| Time | Drawdown (ft) | pH (S.U.) | Cond. (uS/cm) | Temp. (°C) | Notes |
|---|---|---|---|---|---|
| 9:53 | | 6.24 | 842.0 | 6.6 | Started Pumping 4.18 L/M |
| 41. 9:58 | 7.7 | 6.51 | 836.5 | 6.5 | |
| 45.1 10:01 | | | | | Stopped Pumping / dry |
| | | | | | |
| | | | | | |
| 45.5 11:06 | | 7.10 | 931.2 | 7.7 | |
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**Sample Method:** Purge & return **Rate (gpm):** ~1.10 **Time Start:** 9:53 **Time End:** 11:06

| Final Parameters | Stabilization Guidance | | Met? | Comments |
|---|---|---|---|---|
| pH | 7.10 | 0.1 | Y / N | |
| Conductivity | 931.2 | 3% | Y / N | |
| Temp© | 7.7 | 10% | Y / N | |
| Final H2O level | | feet | | |

O/G visible: Y / N Turbid? Y / N

Equipment Decontaminated: Y / N

Decontamination procedure used: Triple rinse w/ Liquinox before Sampling

Weather: Clear, Sunny

Signature:

**Well Volume Calculation:**

**For 2" Diameter Well (gal):** $V(gal) = 0.1632 * h(ft)$ **For 4" Diameter Well (gal):** $V(gal) = 0.6528 * h(ft)$

**For 2" Diameter Well (L):** $V(L) = 0.61778 * h(ft)$ **For 4" Diameter Well (L):** $V(L) = 2.471 * h(ft)$

**Water Column Calculation:** $h(ft) = Total\ Depth(TD)(ft) - Depth\ to\ Water(DTW)(ft)$

**Well Volume Purge Method:** *Three Well Volumes = 3*V*

**Conversions:**
$1ft^3 = 7.48\ gal$
$1gal = 3.785\ L$

**Show Calculations:**

**Newmont Mining Co**
**Cripple Creek & Victor Gold Mining Co**

## Groundwater Sampling Log

**Location :** Grassy valley
**Technician:** P. Barela
**Static Water Level (DTW):** 33.8
**Date:** 10/17/23
**Quarter:** 4
**Well ID:** GVMW-7B
**Well Depth (TD):** 50 feet
**Is well Dry?** NO
**If so Dry at:** _____ feet

| Time | Depth to Water (ft) | Drawdown (ft) | pH (S.U.) | Cond. (uS/cm) | Temp. (°C) | Notes |
|---|---|---|---|---|---|---|
| 8:53 | | | 6.32 | 986.5 | 6.5 | |
| | | | | | | |
| 9:00 | 47.7 | | | | | stopped pumping |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| 10:20 | 46 | | 7.22 | 1032 | 8.4 | |
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**Sample Method:** Purge & return **Rate (gpm):** _____ **Time Start:** 8:53 **Time End:** 10:20
** Flow rate at stabilization (during sample collection)*

| Final Parameters | Stabilization Guidance | | Met? | Comments |
|---|---|---|---|---|
| pH | 7.22 | 0.1 | Y / N | |
| Conductivity | 1032 | 3% | Y / N | |
| Temp© | 8.4 | 3% | Y / N | |
| DTW Stabilized | 46 | feet | Y / N | |
| Final H2O level | 46 | feet | | |

If Low Flow Method: Drawdown greater than 0.33 ft? Y / N If yes, required pump vol (gal): _____ following stabilization Actual vol. pumped (gal) _____
** See Field Volume Guide*

O/G visible: Y / N
Turbid? Y / N
Equipment Decontaminated: Y / N
Decontamination procedure used: Triple rinse w/ liquinox before sampling

Weather: Clear, sunny
Signature:

**Volume Calculations:**
**For 2" Diameter Well (gal):** $V(gal) = 0.1632 * h(ft)$ **For 4" Diameter Well (gal):** $V(gal) = 0.6528 * h(ft)$
**Other Diameter Well & Tubing Vol (gal):** $V(gal) = 0.1632 * (r(in))^2 * h(ft)$
**Water Column Calculation:** $h(ft) = Total\ Depth(TD)(ft) - Depth\ to\ Water(DTW)(ft)$
**Well Volume Purge Method:** *Three Well Volumes = 3*V*

**Conversions:**
$1ft^3 = 7.48\ gal$
$1gal = 3.785\ L$

**Show Calculations:**

**Newmont Mining Co**
**Cripple Creek & Victor Gold Mining Co**

## Groundwater Sampling Log

**Location :** Grassy Valley
**Technician:** P. Barela
**Static Water Level (DTW):** 39.4
**Is well Dry?** NO
**If so Dry at:** —

**Date:** 11-13-23
**Quarter:** 4
**Well ID:** GVMW-7B
**Well Depth (TD):** 50 feet

| Time | Depth to Water (ft) | Drawdown (ft) | pH (S.U.) | Cond. (uS/cm) | Temp. (°C) | Notes |
|---|---|---|---|---|---|---|
| 9:58 | | | 7.18 | 1017 | 6.6 | Started Pumping |
| 10:05 | 48 | 8.6 | | | | Stopped Pumping |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| 11:54 | 46.9 | | 8.17 | 1000 | 8.0 | Collected Sample |
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**Sample Method:** Purge & return **Rate (gpm):** — **Time Start:** 9:58 **Time End:** 11:54
** Flow rate at stabilization (during sample collection)*

| Final Parameters | Stabilization Guidance | | Met? | Comments |
|---|---|---|---|---|
| pH | 8.17 | 0.1 | Y / N | |
| Conductivity | 1000 | 3% | Y / N | |
| Temp© | 8.0 | 3% | Y / N | |
| DTW Stabilized | 46.9 | feet | Y / N | |
| Final H2O level | 46.9 | feet | | |

If Low Flow Method: Drawdown greater than 0.33 ft? ~~Y / N~~ If yes, required pump vol (gal): — following stabilization Actual vol. pumped (gal) —
** See Field Volume Guide*

O/G visible: Y / (N)
Equipment Decontaminated: (Y) / N
Turbid? (Y) / N light

Decontamination procedure used: Triple rinse w/liquinox before sampling

Weather: clear, warm

Signature:

**Volume Calculations:**
**For 2" Diameter Well (gal):** $V(gal) = 0.1632 * h(ft)$ **For 4" Diameter Well (gal):** $V(gal) = 0.6528 * h(ft)$
**Other Diameter Well & Tubing Vol (gal):** $V(gal) = 0.1632 * (r(in))^2 * h(ft)$
**Water Column Calculation:** $h(ft) = Total\ Depth(TD)(ft) - Depth\ to\ Water(DTW)(ft)$
**Well Volume Purge Method:** *Three Well Volumes = 3*V*

**Conversions:**
$1ft^3 = 7.48\,gal$
$1gal = 3.785\,L$

**Show Calculations:**

Newmont
NORTH AMERICA

Cripple Creek & Victor
Gold Mining Company
P.O. Box 191
100 North 3rd Street
Victor, Colorado 80860

P 719.689.2977
F 719.689.3254
newmont.com

# Attachment 2

| SITE | Diameter (in) | Lattitude | Longitude | Land Surface Elev Z | Measuring Point Elevation | TD (ft bgs) | Top of Screen (ft bgs) | Bottom of Screen (ft bgs) |
|---|---|---|---|---|---|---|---|---|
| GVMW 22A-90 | 4 | 38.74077646 | -105.1110422 | 9765.5 | 9766.7 | 91.9 | 70 | 90 |
| GVMW 22B-30 | 4 | 38.74082734 | -105.1110734 | 9766.1 | 9767.5 | 32.1 | 5 | 30 |
| GVMW 8A-250 | 3 | 38.74134673 | -105.1202299 | 9882.5 | 9883.6 | 244.45 | 200 | 250 |
| GVMW 8B-50 | 3 | 38.74133335 | -105.1201662 | 9882.2 | 9883.3 | 49.5 | 20 | 50 |
| GVMW-25 | 4 | 38.74028757 | -105.1196407 | 9864.6 | 9866.6 | 78.6 | 69 | 78 |
| GVMW 4A-480 | 4 | 38.75044877 | -105.1340429 | 10026.2 | 10027.7 | 480 | 430 | 480 |
| GVMW 4B-50 | 4 | 38.75046215 | -105.1340218 | 10026.0 | 10027.6 | 50 | 30 | 50 |
| GVMW 6A-200 | 3 | 38.75244494 | -105.1151788 | 10264.5 | 10266.0 | 194.55 | 160 | 200 |
| GVMW 7A-200 | 3 | 38.74768697 | -105.1243913 | 9954.2 | 9955.7 | 198 | 155 | 195 |
| GVMW 7B-50 | 3 | 38.74771399 | -105.12443 | 9954.0 | 9955.9 | 50 | 20 | 50 |
| GVMW 10-270 | 3 | 38.74438408 | -105.1252417 | 9958.2 | 9959.5 | 264.4 | 210 | 270 |
| GVMW 15A-820 | 4 | 38.74946811 | -105.1357596 | 10046.9 | 10046.9 | 820 | 700 | 800 |
| GVMW 15B-102 | 4 | 38.74941232 | -105.135647 | 10045.4 | 10045.4 | 102 | 78.5 | 98.5 |
| GVMW 15C-1000 | 4 | 38.74950093 | -105.1358985 | 10046.9 | 10051.9 | 1000 | unkown | unknown |
| GVMW 21A-190 | 4 | 38.75399135 | -105.1320774 | 10185.4 | 1087.3 | 190 | 140 | 190 |
| GVMW 23A-65 | 4 | 38.74456456 | -105.1113666 | 9978.3 | 9980.1 | 65.0 | 20 | 60 |
| GVMW 23B-30 | 4 | 38.74459333 | -105.1113535 | 9978.6 | 9980.4 | 31.5 | 10 | 30 |
| GVMW 24A-250 | 4 | 38.73781415 | -105.1187329 | 9914.0 | 9917.0 | 250 | 210 | 250 |
| GVMW 24B-100 | 4 | 38.73776304 | -105.1187142 | 9914.5 | 9917.2 | 100.4 | 80 | 100 |
| OSABH-12 | 2 | 38.73772243 | -105.1187148 | 9915.8 | 9918.4 | 39.00 | 29 | 39 |
| OSABH-14 | 2 | 38.7413539 | -105.1203234 | 9880.7 | 9882.7 | 28.90 | 18 | 28 |
| OSABH-16 | 2 | 38.74447669 | -105.125366 | 9959.7 | 9961.3 | 40.50 | 30 | 40 |
| OSABH-17 | 2 | 38.74832178 | -105.1327161 | 10021.6 | 10022.9 | 30.35 | 20 | 30 |
| OSABH-18 | 2 | 38.74946251 | -105.1358994 | 10047.7 | 10049.8 | 51.70 | 40 | 50 |
| GVPZ-01 | 2 | 38.75098801 | -105.137207 | 10090 | 10092 | 38.45 | 8 | 38 |
| GVPZ-02 | 2 | 38.75148773 | -105.1378555 | 10090 | 10092 | 31.35 | 9 | 29 |
| GVPZ-03 | 2 | 38.75223923 | -105.1388168 | 10103 | 10105 | 20.7 | 9 | 19 |
| GVPZ-04 | 2 | 38.75299072 | -105.140625 | 10133 | 10135 | 41.35 | 9 | 39 |

Wells removed by mining operations (WHEX)