Newmont
NORTH AMERICA

Cripple Creek & Victor
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SENT VIA ELECTRONIC COMMUNICATION

April 18, 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, Grassy Valley Groundwater and Surface Water Monitoring Report January 2024; 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, Grassy Valley Groundwater and Surface Water Monitoring Report January 2024*; Permit No. M-1980-244. CC&V has reviewed the additional information required in the letter dated March 21, 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. **What are the Operator's plans to rehabilitate GVMW-24A in order to consistently collect a water quality sample from this location?**

CC&V is currently planning to re-develop the well during the week of April 22nd and will attempt to clear the sediment to allow for use of a deployable pump in the well to regularly collect samples. CC&V plans to collect a sample before the end of April 2024 pending the successful redevelopment process. A description of the well conditions was included in the Additional Information Request No. 2 for the December 2023 Grassy Valley Monthly Report.

2. **On Table 2 the Reg 41 TVS for pH is stated as 6.0 – 8.5, this is incorrect. The Reg 41 Table Value Standard (TVS) for pH is 6.5 – 8.5. Please update and resubmit Table 2.**

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This has been corrected at the revised Table 2 is included as Attachment 1.

3. **Table 2 indicates a field pH measurement in GVMW-8A of 3.59, which is then qualified to be an error and assumed to be closer to 7 as measured by the laboratory.**

   According to the approved QAPP, Section 4.4, all calibration and calibration check data will be documented in the field log book. All field equipment will be calibrated prior to field use. Calibration procedures shall follow the manufacturers' specifications. A calibration check will be performed after all samples have been collected for the day. Calibration checks will not be used to correct pH readings taken during the day. Please state whether or not a calibration check was performed before or after sampling GVMW-8A. If a check was performed provide the corroborating records from the field log book

Calibration logs for the date of sample collection at GVMW-8A (January 18, 2024) are included as Attachment 2. The meter was re-calibrated before its next use (January 24, 2024). CC&V replaced the pH probe on this specific water quality meter on January 18, 2024 as a result of this anomalous reading and it has been functioning properly since.

4. **In the approved QAPP, Appendix K - Myron L II Ultrameter Calibration procedure, it is stated "The Myron L II is to be calibrated prior to use for the day and details of the calibration are to be recorded in calibration log book/Sheet." Please provide a copy of the calibration log book/Sheet that documents the meter was properly calibrated prior to use on the days in January where samples were collected in Grassy Valley.**

Calibration logs for the requested time period are included in Attachment 2.

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,

DocuSigned by:
Katie Blake
5A3D013B629844B...

Katie Blake
Sustainability & External Relations Manager

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

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Attachment 1

Table 2
Grassy Valley Monthly Groundwater Analytical Results - January 2024
Cripple Creek and Victor Gold Mining Company

ANALYTE	Reg 41 TVS	Site Wide NPL	UNIT	Well I.D. Sample Date	GVMW-7A 1/9/2024	GVMW-7B 1/9/2024	GVMW-8A* 1/18/2024	GVMW-8B 1/18/2024	GVMW-10 1/24/2024	GVMW-15B 1/10/2024	GVMW-22A 1/18/2024	GVMW-22B 1/18/2024	GVMW-25 1/9/2024
Aluminium - Dissolved	5	**7**	mg/L		<0.080	<0.080	<0.080	<0.080	<0.080	0.625	<0.080	<0.080	**766**
Ammonia	NA	NA	mg/L		<0.030	<0.030	<0.030	<0.030	<0.030	0.031	<0.030	<0.030	<0.030
Antimony - Dissolved	**0.006**	NA	mg/L		<0.00100	<0.00100	<0.00100	<0.00100	0.00194	<0.00100	<0.00100	<0.00100	**<0.200**
Arsenic - Dissolved	**0.01**	NA	mg/L		<0.00100	<0.00100	<0.00100	<0.00100	<0.00100	<0.00100	<0.00100	<0.00100	**<0.200**
Barium - Dissolved	**2**	NA	mg/L		0.153	0.0397	<0.0020	0.0078	0.0239	0.0123	0.11	0.0481	0.0138
Beryllium - Dissolved	**0.004**	NA	mg/L		<0.00200	<0.00200	<0.00200	<0.00200	<0.00200	**0.0436**	<0.00200	<0.00200	**0.4800**
Boron - Total	**0.75**	NA	mg/L		<0.0400	<0.0400	<0.0400	<0.0400	<0.0400	<0.0400	<0.0400	<0.0400	<0.0400
Cadmium - Dissolved	**0.005**	**0.005**	mg/L		<0.0020	<0.0020	<0.0020	<0.0020	<0.0020	0.0036	<0.0020	<0.0020	**1.63**
Chloride - Total	**250**	NA	mg/L		4.85	78.8	63.3	37.9	5.02	0.52	4.25	8.04	25.1
Chromium - Dissolved	**0.1**	NA	mg/L		<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	0.0877
Cobalt - Dissolved	**0.05**	NA	mg/L		<0.0060	<0.0060	<0.0060	<0.0060	<0.0060	**0.0869**	<0.0060	<0.0060	**1.82**
Copper - Dissolved	**0.2**	**0.2**	mg/L		<0.0100	<0.0100	<0.0100	0.0213	0.0132	<0.0100	<0.0100	<0.0100	**2.88**
Cyanide - Free	**0.2**	NA	mg/L		<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
Cyanide - Total	NA	NA	mg/L		<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
Cyanide - WAD	NA	**0.2**	mg/L		<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050
Fluoride - Total F	**2**	**2**	mg/L		0.08	0.44	1.96	**2.24**	0.218	0.492	**2.1**	0.376	**12.1**
Iron - Dissolved	0.3	**14**	mg/L		1.040	<0.100	<0.100	<0.100	<0.100	24.5	<0.100	<0.100	0.878
Lead - Dissolved	**0.05**	NA	mg/L		<0.0075	<0.0075	<0.0075	<0.0075	<0.0075	**0.0547**	<0.0075	<0.0075	0.0247
Lithium - Dissolved	**2.5**	NA	mg/L		<0.040	<0.040	<0.040	<0.040	0.054	<0.040	<0.040	<0.040	0.217
Manganese - Dissolved	0.05	**3**	mg/L		0.181	<0.0080	<0.0080	0.0082	0.2	1.58	0.016	<0.0080	**205**
Mercury - Dissolved	**0.002**	**0.002**	mg/L		<0.000200	<0.000200	<0.000200	<0.000200	<0.000200	<0.000200	<0.000200	<0.000200	<0.000200
Molybdenum - Dissolved	**0.21**	NA	mg/L		<0.0080	<0.0080	<0.0080	<0.0080	0.0105	<0.0080	<0.0080	<0.0080	<0.0080
Nickel - Dissolved	**0.1**	NA	mg/L		<0.0100	<0.0100	<0.0100	<0.0100	<0.0100	**0.137**	<0.0100	<0.0100	**2.34**
Nitrate as Nitrogen	**10**	**10**	mg/L		<0.050	0.478	1.08	2.34	0.172	<0.050	<0.050	0.479	3.83
Nitrite + Nitrate as Nitrogen	10	**11**	mg/L		<0.100	0.478	1.09	2.34	0.177	<0.100	<0.100	0.479	3.86
Nitrite as Nitrogen	**1**	**1**	mg/L		<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.050	<0.500
pH Field	6.5-8.5	**6.0-8.5**	pH units		7.37	7.40	**3.59****	6.21	6.66	**4.17**	7.36	6.04	**3.84**
Selenium - Dissolved	0.02	**0.024**	mg/L		<0.00100	0.00102	<0.00100	<0.00100	0.00310	<0.00100	<0.00100	<0.00100	**<0.200**
Silver - Dissolved	**0.05**	NA	mg/L		<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	<0.0050	0.0329
Sodium - Dissolved	NA	NA	mg/L		8.99	13	23.8	25.4	37.8	13.4	36.9	22.1	45.4
Sulfate - Total	**250**	NA	mg/L		17.8	153	61.6	92.4	**1,480**	**315**	36.1	90.8	**7,920**
Thallium - Dissolved	**0.002**	NA	mg/L		<0.000200	<0.000200	<0.000200	<0.000200	<0.00100	<0.000200	<0.000200	<0.000200	**<0.0400**
Total Dissolved Solids	NA	NA	mg/L		212	467	301	294	2,200	479	259	277	9,650
Uranium - Dissolved	**0.03**	NA	mg/L		0.00345	0.0181	0.00423	0.00247	**0.0566**	0.00561	0.0036	0.000883	**2.47**
Vanadium - Dissolved	**0.1**	NA	mg/L		<0.0050	<0.0050	<0.0050	<0.0050	0.006	<0.0050	<0.0050	<0.0050	<0.0050
Zinc - Dissolved	**2**	**2**	mg/L		<0.0100	<0.0100	<0.0100	<0.0100	0.062	1.99	<0.0100	<0.0100	**63.3**

Notes:

Applicable Standard vs. Non-applicable standard
* NPL of 1.0 mg/L for manganese and 6.5-8.5 for pH applies to GVMW-8A
Result below laboratory detection limit
BOLD - exceeds applicable standard
< - less than
mg/L - miligrams per liter
NPL - Numeric Protection Limit
NS- Not sampled
TVS - table value standard
NS- Not sampled
** - pH recorded at the lab for this sample was 7.0. Field measurment of pH (3.59) for this sample is believed to be inaccurate due to a calibration/measurment issue with the meter.

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Attachment 2

YSI PRO+SN Calibration Sheet
Newmont CC&V

Date: 1-9-24 Time: 7:414 Operator Name: P-Barela

Serial Number: 16K102160

Parameter	Buffer Standard Used	Pre-Calibration	Post-Calibration
Specific Conductivity (µs/cm)	KCL 1413 Solution	~~1408~~ 1411 µS/cm 14.2 °C	1167 µS/cm 14.2 °C
Dissolved Oxygen (DO)	Solution	0.06 mg/L 14.2 °C	0.06 mg/L 14.2 °C
Oxidation/Reduction (ORP)	Solution	224.6 mV 14.3 °C	226.9 mV 14.3 °C
pH	**Solution Value**	Calibration Result: Before	After
pH Duffer Point # 1	| 4.00 |	4.00 pH 163.7 mV 14.2 °C	3.98 pH 165.5 mV 14.1 °C
pH Duffer Point # 2	| 10.00 |	9.99 pH -170.4 mV 14.2 °C	9.98 pH -172.8 mV 14.2 °C
pH Duffer Point # 3	| 7.00 |	7.01 pH -6.6 mV 14.0 °C	6.98 pH -4.6 mV 14.0 °C

Myron L II Calibration Sheet
Newmont CC&V +A1:D16

Date: 1/9/24 Time: 7:28

Name of Operator: P. Barela

Serial Number: 62754177

Parameter	Buffer Standard Used	Pre-Calibration	Post-Calibration
Specific Conductivity (µS/cm)	KCL 1413 Solution	1419 µS/cm 14.1 °C	1413 µS/cm 14.1 °C
Total Dissolved Solids (TDS)	442-3000 Solution	3012 ppm 14.1 °C	3000 ppm 14.1 °C

pH	Solution Value	Calibration Result: Before	Calibration Result: After
pH Buffer Point #1	I 4.00 I	pH = 4.24 376 mV 14.2 °C	pH = 4.00 376 mV 14.2 °C
pH Buffer Point #2	I 7.00 I	pH = 7.10 313 mV 14.2 °C	pH = 7.00 320 mV 14.2 °C
pH Buffer Point #3	I 10.00 I	pH = 10.35 281 mV 14.3 °C	pH = 10.00 276 mV 14.3 °C

Calibration Record sheet developed 5/10/2021

YSI PRO+SN Calibration Sheet
Newmont CC&V

Date: 1-10-23 Time: 8:47 Operator Name: P. Barela

Serial Number: 16K102160

Parameter	Buffer Standard Used	Pre-Calibration	Post-Calibration
Specific Conductivity (µs/cm)	KCL 1413 Solution	483.3 µS/cm 14.1 °C	1480 µS/cm 14.1 °C
Dissolved Oxygen (DO)	Solution	0.17 mg/L 14.3 °C	0.5 mg/L 14.6 °C
Oxidation/Reduction (ORP)	Solution	225.9 mV 14.5 °C	227. mV 14.5 °C
pH	**Solution Value**	Calibration Result: Before	After
pH Duffer Point # 1	| 4.00 |	3.99 pH 161.5 mV 14.2 °C	4.00 pH 164.6 mV 14.2 °C
pH Duffer Point # 2	| 10.00 |	10.03 pH -171.5 mV 14.3 °C	10.01 pH -172.6 mV 14.2 °C
pH Duffer Point # 3	| 7.00 |	7.13 pH -12.1 mV 13.9 °C	7.06 pH -7.3 mV 14.0 °C

YSI PRO+SN Calibration Sheet
Newmont CC&V

Date: 1-18-24 Time: 6:56 Operator Name: P. Barela

Serial Number: 16K 102160

Parameter	Buffer Standard Used	Pre-Calibration	Post-Calibration
Specific Conductivity (µs/cm)	KCL 1413 Solution	1500 µS/cm 14.5 °C	1458 µS/cm 14.5 °C
Dissolved Oxygen (DO)	Solution	0.12 mg/L 14.6 °C	0.09 mg/L 14.6 °C
Oxidation/Reduction (ORP)	Solution	224.2 mV 14.6 °C	227.0 mV 14.5 °C
pH	**Solution Value**	Calibration Result: Before	Calibration Result: After
pH Duffer Point # 1	| 4.00 |	4.08 pH 158.3 mV 14.3 °C	3.99 pH 158.9 mV 14.3 °C
pH Duffer Point # 2	| 10.00 |	10.01 pH -174.4 mV 14.4 °C	10.00 pH -174.9 mV 14.4 °C
pH Duffer Point # 3	| 7.00 |	7.09 pH -12.3 mV 13.9 °C	7.00 pH -7.2 mV 13.9 °C

YSI PRO+SN Calibration Sheet
Newmont CC&V

Date: 1-24-24 Time: 8:22 Operator Name: P. Barela

Serial Number: 16K102160

Parameter	Buffer Standard Used	Pre-Calibration	Post-Calibration
Specific Conductivity (µs/cm)	KCL 1413 Solution	1431 µS/cm 16.4 °C	1213 µS/cm 16.5 °C
Dissolved Oxygen (DO)	Solution	0.22 mg/L 16.5 °C	0.12 mg/L 16.5 °C
Oxidation/Reduction (ORP)	Solution	226.1 mV 16.4 °C	226.7 mV 16.4 °C
pH	**Solution Value**	Calibration Result: Before	Calibration Result: After
pH Duffer Point # 1	| 4.00 |	4.01 pH 159.9 mV 16.2 °C	4.00 pH 161.9 mV 16.2 °C
pH Duffer Point # 2	| 10.00 |	9.97 pH -174.4 mV 16.3 °C	10.00 pH -174.5 mV 16.2 °C
pH Duffer Point # 3	| 7.00 |	7.05 pH -8.9 mV 16.2 °C	7.00 pH -7.8 mV 16.2 °C

Myron L II Calibration Sheet
Newmont CC&V +A1:D16

Date: 1-24-24 Time: 8:10

Name of Operator: P. Barela

Serial Number: 6275477

Parameter	Buffer Standard Used	Pre-Calibration	Post-Calibration
Specific Conductivity (µS/cm)	KCL 1413 Solution	1412 µS/cm 16.8 °C	1413 µS/cm, 16.8 °C
Total Dissolved Solids (TDS)	442-3000 Solution	3001 ppm 16.5 °C	3000 ppm 16.5 °C

pH	Solution Value	Calibration Result:	
		Before	After
pH Buffer Point #1	I 4.00 I	pH = 4.14 393 mV 16.6 °C	pH = 4.00 392 mV 16.6 °C
pH Buffer Point #2	I 7.00 I	pH = 7.07 310 mV 16.5 °C	pH = 7.00 315 mV 16.5 °C
pH Buffer Point #3	I 10.00 I	pH = 10.28 286 mV 16.8 °C	pH = 10.00 272 mV 16.7 °C

Calibration Record sheet developed 5/10/2021