

April 25, 2024

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

Re: Additional Information Required, Draft Grassy Valley Weekly Surface Water Monitoring Report April 15, 2024; Permit No. M-1980-244

Dear Ms. Smith:

On April 23, 2024, the Division of Reclamation, Mining and Safety (Division/DRMS) received the results of the surface water sample collected at GV-06 in Grassy Valley on April 15, 2024. After review of the submission the Division has additional items that need to be addressed or clarified.

1. Please provide a detailed discussion on why it took so long to receive the rush analytical results.
2. Please provide documentation, e.g. a copy of the signed Chain-of-Custody, that clearly indicates the Operator requested rush analysis of the sample.
3. Please provide a copy of the field sheet for the GV-06 surface water sample collected on 4/15/2024.
4. On the draft results table provided the Phosphorus exceedance is not bolded. Please correct and resubmit.
5. Please explain how the chlorine result is invalid due to exceeding regulatory hold time on a rush sample.
6. The footnote and chronic concentration of Arsenic (T) 0.005 mg/L needs additional explanation. In Regulation No. 32 – Classifications and Numeric Standards for the Arkansas River Basin (5 CCR 1002-32), pursuant to Section 32.6(2)(c)(i), the temporary modification for chronic arsenic standards applied to segments with an arsenic standard of 0.02 µg/L that has been set to protect the Water + Fish qualifier is listed in the Other column in Appendix 32-1 tables as As(ch)=hybrid. The Division interprets this to indicate the Arsenic (T) chronic value is 0.02 µg/L, same value used in prior surface water result tables for GV-06, not 0.005 mg/L.



Please explain how the Operator arrived at the 0.005 mg/L concentration.

The given reference to Section 32.63 appears to explain why the temporary modification for Arsenic was extended but does not appear to change the As(ch)=hybrid in 32.6(2)(c)(i), please comment.

7. A review of 5 CCR 1002-32, section 32.5(3) for Uranium indicates the values being used in the table provided are incorrect. Since stream segment COARUA24, mainstem of East and West Beaver Creeks, including all tributaries and wetlands, from the source to the confluence with Beaver Creek; mainstem of Beaver Creek from the source to the point of diversion to Brush Hollow Reservoir, has a classification of Water Supply the standard to be used should be between 16.8-30 µg/L. A response is required.

Please respond to these items within 7 days of the date on this letter, by **May 2, 2024**. The Division reserves the right to further supplement this document with additional items and details as necessary. Once the items above are addressed to the Division's satisfaction, the Division will allow normal monthly monitoring of GV-06 to resume.

If you need additional information or have any questions, please contact me by email at patrick.lennberg@state.co.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrick Lennberg".

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
Zach Trujillo, DRMS
Lucas West, DRMS
Hunter Ridely, DRMS