

April 30, 2024

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

Re: Comment Letter, Grassy Valley Groundwater and Surface Water Monitoring Report December 2023; Permit No. M-1980-244

Dear Ms. Smith:

On April 19 2024, the Division of Reclamation, Mining and Safety (Division/DRMS) received your responses to the Division's Additional Information Required No. 2 for the Grassy Valley Groundwater and Surface Water Monitoring Report for December 2023. After review of the submission the Division has following response.

1. In response to question No. 2 the Operator states:

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.

Until the Operator revises the currently approved QAPP, sampling of wells with water columns shall be purged according to the approved QAPP. Approved sampling methods include volumetric purging and purge and return methods. Both of these methods can be used to collect samples from wells that maybe low-yielding and low recovery wells, which is why these methods were included into the QAPP. The Operator can clearly qualify the results in the report and on the field sheets. **Failure to follow the approved QAPP will result in enforcement actions.**

No further response needed.

At this time, the Division has concluded its review of the Grassy Valley Groundwater and Surface Water Monitoring Report for December 2023.



If you need additional information or have any questions, please contact me 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
Zach Trujillo, DRMS
Lucas West, DRMS
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