



June 4, 2024

ELECTRONIC DELIVERY

Mr. Elliott Russell  
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: Permit No. M-1980-244; Cripple Creek & Victor Gold Mining Company; Cresson Project;**  
**Technical Revision 142 – Adequacy Review Response**

Dear Mr. Russell:

On April 11, 2024, Newmont Corporation's Cripple Creek and Victor Gold Mining Company (CC&V) received the Division of Reclamation, Mining and Safety (DRMS) Adequacy Review of Technical Revision (TR) 142 to Permit M-1980-244, regarding the South Cresson Backfill Project. Below are DRMS comments in bold and CC&V's responses in *italics*.

**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.**

*Please see the attached revised 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.**

*The Amendment -13, Exhibit F Reclamation maps that apply to South Cresson are F1 and F6. Please see the attached revised maps.*

**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.**

*Backfill material will continue to be placed in South Cresson until the elevation of 9830 has been reached, however, that could change with future developments, in which a TR would be submitted to DRMS for review and approval.*

**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.**

*At this time, the area for the South Cresson is not proposed be backfilled with the intent for future surface facilities.*

**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.**

*The proposed backfill will be constructed similarly to previously permitted and approved backfill projects at CC&V. Backfilling will be accomplished by truck placement of the overburden material in "lifts" that will vary in height depending on the logistics of truck hauling.*

*No QA/QC plan has been submitted, as the area will not be utilized for future surface facilities.*

**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.**

*The South Cresson Backfill figure has been updated to reflect that the area between the South Cresson Pit and VLF1 is not excluded from growth medium placement. CC&V commits to placing growth medium within the South Cresson backfill area.*

**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?**

*CC&V has a sufficient surplus of growth medium stockpiled onsite for placement on the proposed South Cresson backfill; therefore, no growth medium will need to be imported. In the AM-13 adequacy*

*review, CC&V provided calculations that show a surplus of approximately 105,000 CY of growth medium.*

*The proposed South Cresson backfill surface area is 20.8 acres; however, the AM-13 Reclamation Costs already included approximately 10 acres of growth medium placement on the South Cresson Pit floor. Topsoiling the proposed backfill surface area would require an increase of roughly 10.8 acres, or additional 8,712 CY of growth medium, which can be accounted for from the surplus stockpiled on site.*

**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.**

*The approved Reclamation Plan states that trees and/or shrubs will be planted on most north and east-facing slopes for viewshed purposes. The proposed South Cresson backfill will not contain north or east-facing slopes that meet the criteria for successful tree planting.*

**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.**

*No further response is required.*

Should you require further information, please do not hesitate to contact Johnna Gonzalez at (719)851-4190, [Johnna.Gonzalez@Newmont.com](mailto:Johnna.Gonzalez@Newmont.com), or myself at (719) 237-3442 or [Katie.Blake@newmont.com](mailto:Katie.Blake@newmont.com).

Sincerely,

DocuSigned by:  
  
Katie Blake

Sustainability & External Relations Manager  
Cripple Creek & Victor Gold Mining Co

EC:

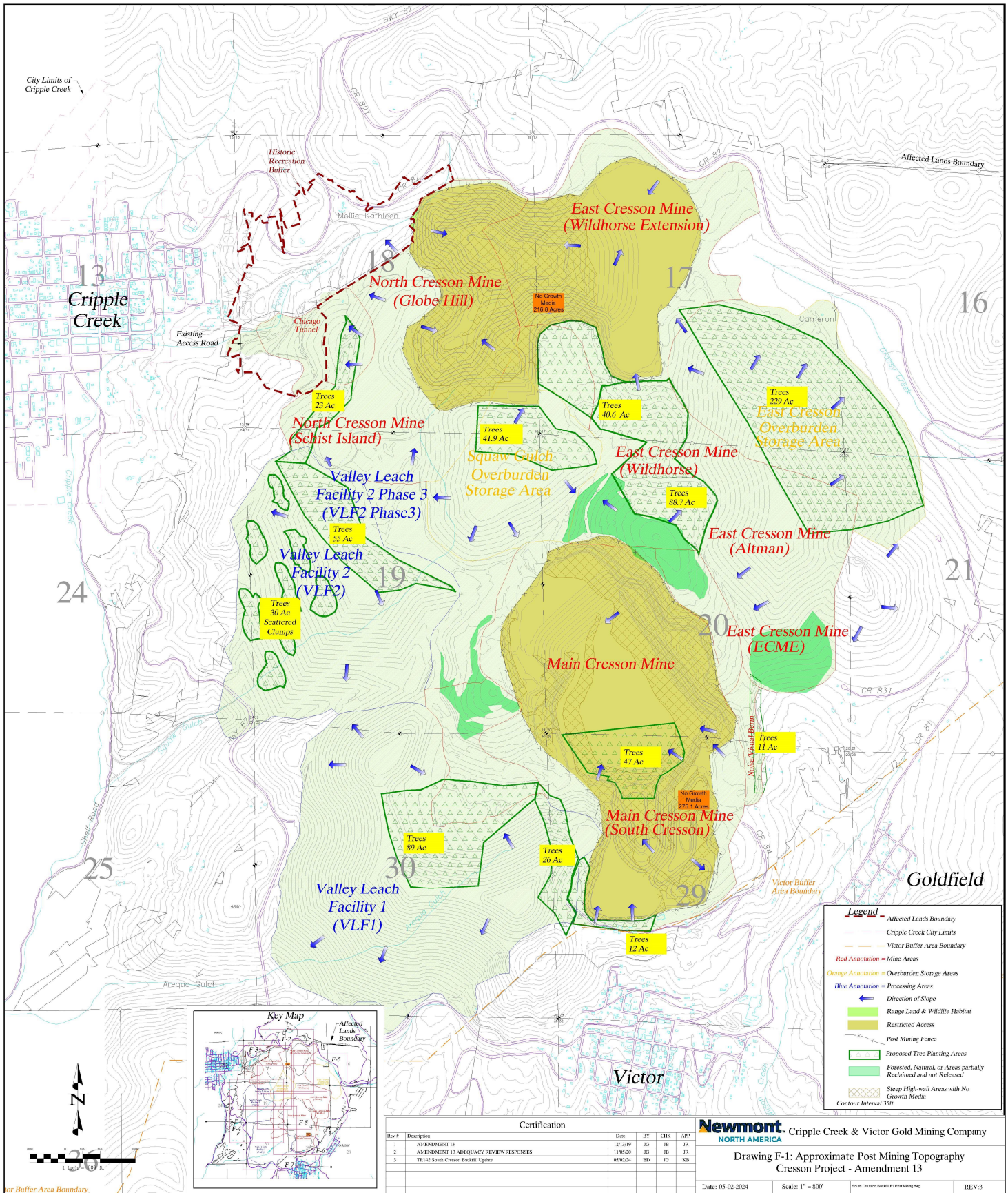
H. Ridley – DRMS  
E. Russell – DRMS  
Z. Trujillo - DRMS  
J. McBryde – Teller County  
J. Gonzalez – CC&V  
K. Blake – CC&V  
N. Townley – CC&V  
S. Thibeault - Newmont



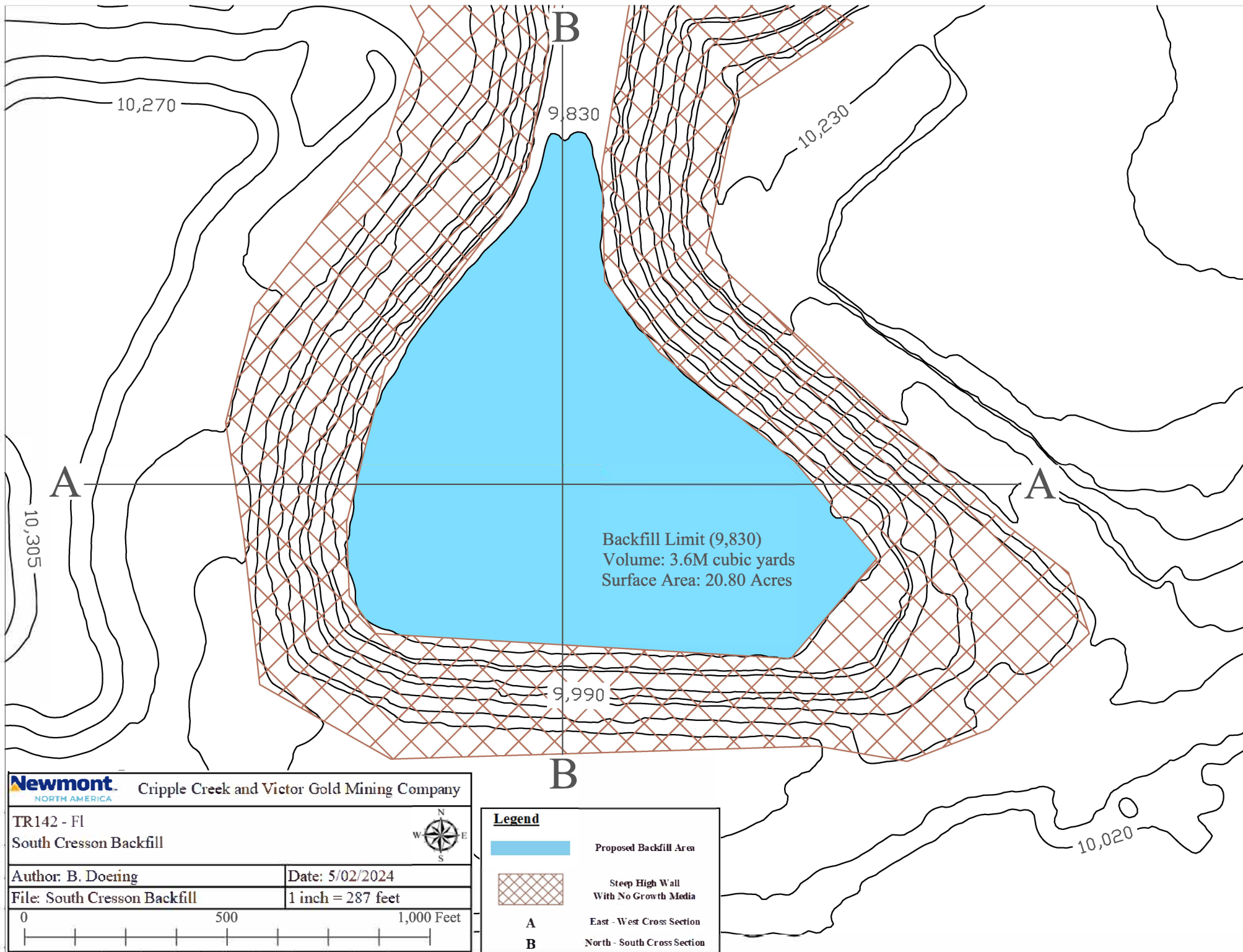
Attachment 1 – F1 Post Mining South Cresson Backfill  
Attachment 2 – F6 - South Cresson Backfill Map

Discovery:\\CC&V\\S&ER Environmental\\Correspondence\\DNR\\DRMS\\Outgoing\\June 2024









**Newmont**  
NORTH AMERICA

Cripple Creek and Victor Gold Mining Company

TR142 - FI  
South Cresson Backfill

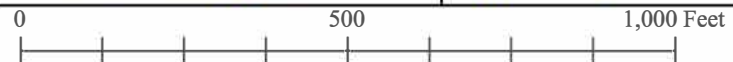


Author: B. Doering

Date: 5/02/2024

File: South Cresson Backfill

1 inch = 287 feet



**Legend**



Proposed Backfill Area



Steep High Wall  
With No Growth Media

A

East - West Cross Section

B

North - South Cross Section