



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

June 17, 2024

Johan Van Huyssteen
Cripple Creek & Victor Gold Mining Company
P.O. Box 191
Victor, CO 80860

RE: Division Adequacy Review No. 1; Technical Revision 144 (TR-144) ECOSA Seepage Collection Improvements; Cresson Project; Permit No. M-1980-244

Dear Johan Van Huyssteen,

On May 24, 2024, the Division of Reclamation, Mining and Safety (Division/DRMS) received your request for Technical Revision 144 (TR-144). After review of the submission the Division has the following list of items that need to be addressed to the Division's satisfaction.

1. In the last table, of section "Collection Area Sizing", the HDR memo gives the total volume of each collection basin. In the design drawing, CS500, the collection basin volumes are oversized. Please state how much freeboard the design drawing volumes allow for each basin. The Division will require a demonstration that there is a minimum of 2 feet of freeboard for each collection basin.
2. Page 1 of the Seepage Collection Design Memorandum states that the water in the catchment basins will be pumped as needed using a water truck, which will be offloaded in the lined Valley Leach Facilities. Please provide details and procedures on how pumping out of the collection basins will be completed to contain spillage.
3. Please provide details on how the subgrade will be prepared for liner installation to prevent puncture of the liner from angular waste rock materials. It appears that in some locations portions of the ECOSA overburden material may need to be removed prior to excavating into the clay material.
4. Please clarify if clay material will need to be sourced from another location or if all the material will be sourced from the ditch and collection basin excavations.
5. Please provide additional details in the form of a narrative, and supported by drawings where necessary, detailing the subgrade preparation, liner installation procedures and quality assurance documentation to be utilized during the construction. Please note that the ditches



and ponds will be considered an Environmental Protection Facility and a certified as-built package will be required after the completion of construction.

6. The Division is aware the Operator removes water accumulated in the seep collection basins and disposes the water on the VLF's. It is the Division's understanding, the leachate within the VLF's needs to be maintained at a high enough pH to prevent cyanide from vaporizing. Please provide a discussion on how the low pH water, from the seeps (current and proposed) impacts and interacts with the high pH leachate.

This concludes the Division's Adequacy Review of TR-144. The Division reserves the right to further supplement this document with additional items and/or details as necessary.

The decision date for your application is set for **June 23, 2024**. If additional time is needed to respond, an extension request must be received by our Office by the decision date. If on the decision date, outstanding adequacy items remain, and no extension request has been received, your revision may be denied and the file terminated.

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
Hunter Ridely, DRMS