

August 13, 2024

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

Re: Comment Letter, Notifications of Water Quality Exceedances; Permit No. M-1980-244

Dear Johan Van Huyssteen:

On July 30th and August 8th, 2024, the Division of Reclamation, Mining and Safety (Division/DRMS) received your Notifications of Water Quality Analysis Exceedances for the Cresson Project, Permit No. M-1980-244. In both of the exceedance notifications CC&V states they are unclear on what groundwater limits apply at the points of compliance in addition to the other monitoring wells at the site. Per the discussions and agreements between CC&V and the Division regarding TR-136, all standards in effect prior to submission of TR-136 and those approved in TR-139 (while TR-136 was under review) are still valid and in effect for all monitoring wells and points of compliance at the site. The Division will continue to use those standards, as agreed upon during those discussions, to measure groundwater quality compliance, at the site, until such time as other standards are accepted and approved through the Colorado Department of Public Health and Environment and the Water Quality Control Commission. A copy of the currently applicable groundwater standards, that are a condition of the approved permit, have been included for your reference.

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

Attachment: Applicable Groundwater Standards at CC&V



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

Attachments

ANALYTE	Reg 41 TVS	Site-Wide NPL	UNIT
Aluminium - Dissolved	5	7	mg/L
Antimony - Dissolved	0.006	NA	mg/L
Arsenic - Dissolved	0.01	NA	mg/L
Barium - Dissolved	2	NA	mg/L
Beryllium - Dissolved	0.004	NA	mg/L
Boron - Total	0.75	NA	mg/L
Cadmium - Dissolved	0.005	0.005	mg/L
Chloride - Total	250	NA	mg/L
Chromium - Dissolved	0.1	NA	mg/L
Cobalt - Dissolved	0.05	NA	mg/L
Copper - Dissolved	0.2	0.2	mg/L
Cyanide - Free	0.2	NA	mg/L
Cyanide - WAD	NA	0.2	mg/L
Fluoride - Total F	2	2	mg/L
Iron - Dissolved	0.3	14	mg/L
Lead - Dissolved	0.05	NA	mg/L
Lithium - Dissolved	2.5	NA	mg/L
Manganese - Dissolved	0.05	3	mg/L
Mercury - Dissolved	0.002	0.002	mg/L
Molybdenum - Dissolved	0.21	NA	mg/L
Nickel - Dissolved	0.1	NA	mg/L
Nitrate as Nitrogen	10	10	mg/L
Nitrite + Nitrate as Nitrogen	10	11	mg/L
Nitrite as Nitrogen	1	1	mg/L
pH Field	6.5-8.5	6.0-8.5	pH units
Selenium - Dissolved	0.02	0.024	mg/L
Silver - Dissolved	0.05	NA	mg/L
Sulfate - Total	250	NA	mg/L
Thallium - Dissolved	0.002	NA	mg/L
Total Dissolved Solids	NA	NA	mg/L
Uranium - Dissolved	0.03	NA	mg/L
Vanadium - Dissolved	0.1	NA	mg/L
Zinc - Dissolved	2	2	mg/L

Notes:

Applicable Standard vs. Non-applicable standard

* well specific NPL applied, refer table 3.2 in the QAPP

Reg 41 TVS - Water Quality Control Commission's The Basic Standards of Ground Water Table Value Standards Tables 1-4

NPL - Numeric Protection Limit

Table 3.2 CC&V Groundwater Standards

Description	Existing Numeric Protection Limits (NPLs)						Reg. 41 Table Value Standard
	GVMW- 8A	CRMW- 3B	VIN-2B	WCMW- 3	WCMW- 6	Sitewide NPL (Existing)	
Aluminum (dis) (mg/L)						7	5
Antimony (dis) (mg/L)							0.006
Arsenic (dis) (mg/L)							0.01
Barium (dis) (mg/L)							2
Beryllium (dis) (mg/L)							0.004
Boron (dis) (mg/L)							0.75
Cadmium (dis) (mg/L)						0.005	0.005
Chloride (dis) (mg/L)							250
Chromium (dis) (mg/L)							0.1
Cobalt (dis) (mg/L)							0.05
Copper (dis) (mg/L)						0.2	0.2
Cyanide [Free] (mg/L)							0.2
Cyanide [WAD] (mg/L)						0.2	---
Fluoride (mg/L)						2	2
Iron (dis) (mg/L)						14	0.3
Lead (dis) (mg/L)							0.05
Lithium (dis) (mg/L)							2.5
Manganese (dis) (mg/L)	1	8.1	4	0.5	0.2	3	0.05
Mercury (dis) (mg/L)						0.002	0.002
Molybdenum (dis) (mg/L)							0.21
Nickel (dis) (mg/L)						0.2	0.1
Nitrate as Nitrogen (mg/L)						10	10
Nitrite as Nitrogen (mg/L)						1	1
Nitrate + Nitrite as Nitrogen (mg/L)						11	10
pH Field - Upper	8.5	9	8.5	9	8.5	8.5	8.5
pH Field - Lower	6.5	6	6.5	6	6.5	6	6.5
Selenium (dis) (mg/L)						0.024	0.02
Silver (dis) (mg/L)							0.05
Sulfate (mg/L)	250	1070	800	250	250		250
Thallium (dis) (mg/L)							0.002
Uranium (dis) (mg/L)							0.03
Vanadium (dis) (mg/L)							0.1
Zinc (dis) (mg/L)						2	2

Notes:

If no NPL exists (Sitewide or well-specific) for that parameter the most stringent value from Colorado Regulation 41 Tables 1, 2, or 3 is applied.

Acronyms:

dis - dissolved

mg/L - milligram per liter