



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

May 20, 2024

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

**Re: Adequacy Review, Revision No. TR143  
Cresson Project, Permit No. M-1980-244**

Dear Johan Van Huyssteen,

On April 25, 2024, the Division of Reclamation, Mining and Safety received the Technical Revision TR143 application for the Cresson Project, Permit No. M-1980-244. TR143 is the VLF2 Phase 3 Stage A.1 Recertification Record of Construction Report required as a corrective action from the Mined Land Reclamation Board for Violation MV-2024-007. Pursuant to Rule 7.3.1(5), no chemicals used in the extractive metallurgical process, or toxic or acid-forming materials shall be placed in the area under the Board's Cease and Desist Order until the Board or Office accepts the recertification of the facility, or phase thereof, that precedes placement. The following comments need to be addressed prior to the DRMS accepting the submitted report:

**Record of Construction Report**

1. **Section 4 Geomembrane Quality Control Submittal:** On page 7, the report states, "The site inventory for all geomembrane used within the VLF2 P3 A.1 Recertification area is presented in Appendix D.1." The referenced appendix is incorrect and needs to be revised to Appendix D.2.
2. **Section 4.1 Geomembrane Installation Personnel Résumés:** On page 7, the report states, "Geomembrane installation personnel résumés for all crews that performed work on the VLF2 P3 A.1 Recertification Project are presented in Appendix D.2." The referenced appendix is incorrect and needs to be revised to Appendix D.1.
3. **Section 4 Geomembrane Quality Control Submittal and Section 4.2 Geomembrane Roll QC Certificates:** Section 4 states the site inventory for all geomembrane used within the recertification area is presented in Appendix [D.2] and Section 4.2 states the QC certificates for each geomembrane roll used within the recertification area are presented in Appendix D.3. Appendix D.2 and D.3 appears to include all 348 geomembrane rolls that were originally brought to the site starting in April of 2022 for the construction of VLF2 Phase 3. As the Roll Numbers provided in Appendix E.1 – Geomembrane Deployment Summary do not easily correlate to the Roll Numbers provided in Appendix D.2 and D.3, please revise Appendix D.2 and D.3 to highlight/call-out which geomembrane rolls were used in the recertification area.

**Appendix H - Drain Cover Fill**

4. **Appendix H.3 – Drain Cover Fill Ore Laboratory Summary and Results:** The header of the CQA Earthworks Testing Summary - Drain Cover Fill (Crushed Ore) Table contains the five specified percent passing ranges of the U.S. standard sieve size for the grain size distribution. Please update the 2-inch and



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¾-inch headers to indicate the range as specified in the Technical Specification No. 02200 Earthworks for Drain Cover Fill (crushed ore) instead of just the lower end of each range.

This concludes the Division's Adequacy Review of TR143. This letter shall not be interpreted to mean that there are no other technical deficiencies in your request as other issues may arise when additional information is supplied. **The current decision date deadline for TR143 has been extended to May 25, 2024.** If there are outstanding issues that have not been adequately addressed prior to the end of the review period, and no extension has been requested, the Division may deny this Technical Revision.

If you have any questions or need further information, please contact me at (303) 866-3567 x8132.

Sincerely,



Elliott R. Russell  
Environmental Protection Specialist

cc: Katie Blake, CC&V  
Johnna Gonzalez, CC&V  
Zach Trujillo, DRMS