

March 10, 2025

Bjorn Meyer
Cripple Creek & Victor Gold Mining Company
P.O. Box 191
Victor, CO 80860

RE: Division Adequacy Review No. 1; Technical Revision 147 (TR147) ECOSA Pumpback System; Cresson Project; Permit No. M-1980-244

Dear Bjorn Meyer,

On February 26, 2025, the Division of Reclamation, Mining and Safety (Division/DRMS) received your request for Technical Revision 147 (TR147). TR147 was required as a part of the Stipulated Enforcement Agreement MV-2024-027 which the Mined Land Reclamation Board approved during the December 11, 2024, meeting. After review of the submission the Division has the following list of items that need to be addressed to the Division's satisfaction.

1. Figure 1 of the Aquifer Testing Report incorrectly identifies GVMW-27B as a Point of Compliance. Please update the figure to accurately reflect the Points of Compliance.
2. In Section 2.3, page 5, the discussion about the installation of GVMW-37A and B is not accurate. CC&V agreed to install these wells, during review of TR141, to address Division concerns about low resistivity areas identified in the Golder report (January 2023) at location PB23-01. Please update for accuracy.
3. Please explain why GVMW-37A and 37B were not selected for additional pump testing beyond the slug tests.
4. It is stated that the effectiveness of pumpback system will be evaluated through monitoring of GVMW-25 after the system is brought online and comparing the results to historical data to identify any changes to groundwater level and possible changes to contaminant concentration trends or a reduction in peak concentrations. During the constant rate pumping tests there were no changes detected in any of the observation wells for any of the tests. How will performance of the pumpback system be evaluated when there is no demonstration that any of the proposed pumping wells are interconnected?



5. If GVMW-25 is used as a pumpback well it would eliminate a long-term monitoring location specifically installed to monitor the impacts of seepage from the ECOSA to Grassy Valley. Please commit to installing a replacement monitoring well adjacent to GVMW-25 prior to bringing GVMW-25 online as a pumping well. The new well would act as an observation well for the pumping of GVMW-25. This new observation well which will replace the GVMW-25 monitoring point would be in addition to the two wells outlined in 17b. of the Stipulated Agreement which have been requested to be installed between GVMW-25 and GVMW-26A/B.
6. The storage tanks that contain extracted groundwater will be periodically drained as needed using a water truck, which will then be offloaded in the lined Valley Leach Facilities. Please provide details and procedures on how pumping out of the storage tanks will be completed to contain spillage.
7. Please commit to providing an annual pumpback system operations report by the end of the first quarter of each year for the previous year of operations. The report should provide a summary of the amount of groundwater removed, operations and maintenance items, and any other miscellaneous items that occurred or happened to the system.
8. Please provide the Reclamation Cost Estimate Table that was revised during the stipulated agreement negotiations for the 50-year operation of the system as outlined in Section 18. Of the Stipulated Agreement.

This concludes the Division's Adequacy Review of TR147. The Division reserves the right to further supplement this document with additional items and/or details as necessary. In accordance with the Stipulated Agreement, a response to this letter is required within 30 days, due **April 9, 2025**.

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
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