

STATE OF COLORADO

DIVISION OF RECLAMATION, MINING AND SAFETY

Department of Natural Resources

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Governor

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Executive Director

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Director

September 10, 2012

Mr. Timm Comer
Cripple Creek & Victor Gold Mining Company
100 N. Third Street
P.O. Box 191
Victor, CO 80860

**Re: Cresson Project; DRMS File No. M-1980-244;
Amendment 10 (AM10) Third Adequacy Review**

Dear Mr. Comer:

The Division of Reclamation, Mining and Safety (Division) has completed its review of CC&V's responses to the Division's second adequacy review for your 112d-3 Reclamation Permit Amendment Application (AM10)/Mine Life Extension 2 (MLE2) for the Cresson Project. This includes the hand-delivered submittal dated August 31, 2012. The following comments retain the number system used in your response.

Response Nos. 47c & d – The Division has not received a response to these comments other than "AMEC is re-configuring the layout/design of the Phase 1 and 2 sediment ponds ...". When can the Division expect the revised drawings for review?

A170 – There appears to be some discrepancies in AMEC's response:

- a) Discrepancies as to the wall thickness of the 48-inch HDPE riser: The "CC&V Reply" and the last line closing the A170 response reference SDR 11; the first and third bullets reference SDR 17; and the wall thickness (2.284") in the third bullet suggests an SDR of 21 (i.e., $48/2.284 = 21.0$). Furthermore, the Division could not find a supplier for 48-inch SDR 11 HDPE pipe. A SDR 11 for a 48-inch pipe would have a wall thickness of ~4.36 inches. Please clarify whether the pipe will be SDR 11, 17 or 21. If SDR 11, please provide a potential supplier.
- b) Third bullet: 48-inch HDPE SDR 17 has a wall thickness of 2.824 inches. Is the wall thickness here a typo?
- c) Seventh bullet: The compressive strength is stated as 11,150 psi. The highest value the Division could find is 1,600 psi. Please provide a reference for the 11,150 psi rating.
- d) Surface area: It appears AMEC is subtracting the surface area (round section looking towards the pipe axis) of the 24 holes from the circumferential area of the pipe cross section. From the cross section point of view, the area of each of the 24 holes would be square (i.e., wall thickness times hole diameter). In this case, the area would be a bit smaller (assuming a wall thickness of 2.824"), but the Division is uncertain of the approach presented. Please explain the approach.

Finally, the Division acknowledges FLSmidth is working with Lidstone (the Division's consultant) to address the vibration loading analysis with respect to the mill platform.

Mr. Timm Comer
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If you have any questions, please feel free to contact the Division.

Sincerely,



Timothy A. Cazier, P.E.
Environmental Protection Specialist

cc: Tony Waldron, DRMS
Tom Kaldenbach, DRMS