

# STATE OF COLORADO

## DIVISION OF RECLAMATION, MINING AND SAFETY

Department of Natural Resources

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John W. Hickenlooper  
Governor

Mike King  
Executive Director

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Director

December 17, 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;  
Technical Revision (TR-66) Preliminary Adequacy Review**

Dear Mr. Comer:

On December 3, 2012 the Division of Reclamation, Mining and Safety (Division) received a request for a Technical Revision (TR-66) addressing the following:

- *Construct above-grade PSES components,*
- *Construct concrete pad/liner for sample preparation reject trailer, and*
- *Extend approved growth medium noise berm.*

The submittal was called complete for the purpose of filing on December 5, 2011. The decision date for TR-64 is January 2, 2013. Please be advised that if you are unable to satisfactorily address any concerns identified in this review before the decision date, **it will be your responsibility to request an extension of the review period.** 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 will deny this technical revision.

The following comments are based on the Division's review of the December 3, 2012 Request for Technical Revision TR-66:

- 1) Page 3, last paragraph – Pursuant to Rules 1.1(14) and 7.2.1, the use of designated chemicals in the PSES causes the facility to be designated an environmental protect facility (EPF). The PSE Liner System Construction, approved by the Division (TR-64) is to function as the secondary containment system for this facility. The Division believes construction to have been completed on the PSE liner system, but we have not received a construction quality assurance (CQA) report. The Division must receive and approve a CQA report prior to construction proceeding for the above-ground PSES components. Please commit to providing a CQA report, stamped and signed by the professional engineer overseeing the design/construction of the PSE liner.
- 2) Page 4, Concrete Pad – The Division's current understanding with respect to reclamation of the metallurgical laboratory is that this structure is to remain for industrial use after mine closure.
  - a. Please clarify whether the proposed concrete pad and liner extension are to be demolished and removed or is it to remain.

- b. If the proposed pad and liner are to be demolished, has the demolition cost been included in the current AM-10 bond estimate calculations?
- 3) Page 5, Financial Warranty/Attachment 14 – The post reclamation intent for the PSES is for it to be demolished. Please clarify where the demolished material is to be disposed.
- 4) Attachment 13 – The revised location/extension of the growth medium noise berm extends through the west lobe of the North Cresson Mine (Schist Island). Please provide some discussion as to:
  - a. How the growth medium stockpiles will be preserved for reclamation, and
  - b. When the stockpiles will be moved with respect to the proposed mine operations in the Schist Island area.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in blue ink, reading "Timothy A. Cazier". The signature is fluid and cursive, with the first name "Timothy" being more prominent.

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

cc: Tom Kaldenbach, DRMS