TELLER COUNTY PLANNING COMMISSION
Regular Meeting: Tuesday September 12, 2017

Agenda Item II

Consideration of a request by the Newmont Mining Corporation, Cripple Creek & Victor Gold Mining Company (CC&V), for approval of Amendment 11 to the Cresson Project, Permit No. M-1980-244-Mine Development Plan (MDP) on land zoned Agricultural (A-1), Teller County, CO (Cripple Creek & Victor Gold Mining Company, 100 North 3rd Street, Victor Colorado 80860).

STAFF REPORT
File No. Amendment - Z17-0004

APPLICANT: Cripple Creek & Victor Gold Mining Company (CC&V)

REPRESENTATIVE: Ms. Meg Burt, (CC&V)

REQUEST: A request for approval of Amendment 11 to the Cresson Project, M-1980-244 Mine Development Plan (MDP).

STAFF: Dan Williams, Teller County Planner

LEGAL DESCRIPTION: A parcel of land over portions of patented mineral surveys located in the Northeast Quarter of Section 24 and the Southeast Quarter of Section 13, Township 15 South, Range 70 West, and across the Southwest Quarter, the Northwest Quarter, and the Northeast Quarter of Section 18, Township 15 South, Range 69 West of the 6th Principal Meridian

ZONE DISTRICT: Agricultural (A-1)/CCMOD
[see Appendix A for Zoning Map of the area]

Publication Date: August 30, 2017
Posted Notice: August 11, 2017
Staff Report Date: August 29, 2017

STAFF RECOMMENDATION: Approval with Conditions

1. SUMMARY OF REQUEST

Teller County recognizes that State and Federal agencies have programs in place to permit, inspect, and enforce requirements at mining operations to assure protection of the environmental resources associated with such mining operations. It is the intent of Teller County to assure that the local land use planning and zoning requirements are addressed without unnecessary duplication of or in contradiction with, the pertinent State and Federal requirements. In the case of Amendment 11, a third party engineering review was also conducted using Drexel, Barrell & Company which focused primarily on the geotechnical data, engineering, hydrology and drainage components of the submittal material received as part of the Amendment 11 Application. Drexel, Barrell & Company found their submittal data to be satisfactory and to standard.
Additionally, CC&V applied to the Colorado Division of Reclamation and Mining Safety (DRMS) to amend its existing State Permit [Permit No. M-1980-244] on December 16, 2015 shortly after the acquisition of the mine [August 2015] by Newmont. Amendment 11 was conditionally approved by the Colorado Division of Reclamation and Mining Safety (DRMS) on February 8, 2017. Teller County was a formal referral agency to the DRMS process and the requirement for Board of County Commissioners approval was noted in our response to DRMS to insure conformance with all Teller County Land Use standards.

The focus of the Teller County review of Amendment 11 proposed development and activities is an analysis of planning and zoning aspects, CCMOD compliance, any impacts to the county, adjacent cities, including associated county infrastructure, and adjacent and adjoining property owner impacts. Impacts to infrastructure were found and will be discussed in further detail in this report.

**Background**

Prior to this submittal, the most recent Division of Reclamation Mining and Safety (DRMS) permit amendment and MDP modification, including the Teller County Review, was submitted in February 2012 as Mine Life Extension (MLE) 2/Amendment 10, which in addition to mine life extension, expanded surface mining areas and added a new valley leach facility (VLF), a high grade mill, an Absorption, Desorption and Recovery (ADR) facility, and other ancillary facilities. MLE2/Amendment 10 activities were approved in September 13, 2012 and are currently ongoing.

**Amendment 11 unique proposed development and activities**

What follows is a summation of Amendment 11 specific development and activities that were requested in CC&V’s application materials and conditionally approved by the DRMS. With the exception of the last point, all development and activity will take place within the Cripple Creek Mining Overlay District (CCMOD). The application materials presented to Teller County contained numerous studies performed to support the Amendment request including two traffic studies, a noise analysis, a visual resource analysis, a socioeconomic report, drainage report, geotechnical analysis and engineering and historic resources information.

- Incorporating the Chicago Tunnel/Proper Adit Conditional Use Permit (CUP) and DRMS 110 low impact permit into the CCMOD; [and extinguishing the Teller County 1988 CUP]
- Modifying mining practices to permit underground mining of ore from the Chicago Tunnel mine area;
- Increasing the elevation of the East Cresson Overburden Storage Area (ECOSA) by 395 feet;
- Modifying the existing High Grade Mill by expanding the mill platform, installing a semi-enclosed concentrate storage building, and two new flotation tanks to prepare concentrate for shipping off-site for final processing;
- Installation of a new truck scale;
• Postponing the backfilling the Wildhorse Extension (WHEX) and Main Cresson mine areas to provide increased operational flexibility;

• Minor modification to the mine plan and backfill sequence for the Globe Hill and Schist Island mine areas to provide increased operational flexibility;

• Minor modification to the reclamation plan to account for changes to backfill plans and overburden storage areas; and

• Minor modifications to the final stacking plan for the Arequa Gulch Valley Leach Facility (AGVLF) to provide increased operational flexibility.

• Shipping a limited quantity of gold ore concentrate off-site for final processing [Nevada]

In its application materials, CC&V included “postpone” and “modify” language in Amendment 11 to allow for operational flexibility depending on business model mine plan requirements, mineral prices, pit position, and cost efficiency. For example, postponing of backfilling the WHEX and Main Cresson Mine areas allows for greater opportunity to keep access to extractable resource and continued mining. This language was included in application materials to DRMS and found to be acceptable and the request approved.

Within the scope of its Amendment 11 application request to both the DRMS and to Teller County, there is no substantial impact to the previously approved reclamation plan or view shed analysis as conducted and approved in Amendment 10. [2012]. Additionally, and as stated in the Amendment 11 Map modification request which expanded the CCMOD, no impact to the city limits boundaries of any adjacent cities will occur nor are there any changes proposed to the Historic Recreational Buffer areas. [see viewshed analysis in Appendix c].

To consolidate already approved underground mining areas and activities under a DRMS 112 (d) permit, CC&V submitted a proposed map change to the CCMOD boundary to Teller County which was approved by the Board of County Commissioners on August 10, 2017. That potential underground mining activity was approved by DRMS in its review of Amendment 11 and it is now contained within the CCMOD for proper oversight and control.

The previously approved CCMOD acreage was 5,988. With the approval of the map change for the expansion of the CCMOD for Amendment 11, the CCMOD acreage is now 6,074 acres, or a 1.4% increase in the size of the CCMOD.

For Amendment 11, the life of the mine remains the same as was approved under MLE2/Amendment 10, which anticipates mining of ore and overburden to continue until approximately 2025, processing of solution from the Valley Leach Facilities to continue until approximately 2032, and final reclamation and closure being completed by roughly 2042.
New Technologies or Mining Practices introduced as part of Amendment 11

Heavy Gold Ore Concentrate Shipping to Nevada

As part of Amendment 11, CC&V will modify the High Grade Mill (HGM) by expanding the mill platform, installing a semi-enclosed concentrate storage building, and two new flotation tanks to prepare concentrate for shipping off-site for final processing. In its current configuration the HGM processes about 5,000 tons of high grade ore per day. The HGM facility concentrates the high grade sulfides using industry standard flotation techniques and regrinds it to a fine particle size in preparation for leaching. Follow on processing currently is completed within the CCMOD. The Amendment 11 modification in this area allows for the removal of the ‘gold flotation concentrate solution’ from the HGM via ground transportation to a 2nd Newmont facility in Nevada for further refinement. In terms of the actual modification of the HGM within the CCMOD, a new conveyor belt system will be installed and a new semi-enclosed concentrate storage building capable of storing 3,000 cubic yards of concentrate. Of note, the ore concentrate destined for Nevada is removed prior to cyanide leaching and will contain no cyanide. The product is inert and in a dry earthen form.

CC&V has stated that this initial proposal is intended as a proof of concept, field trial and business test case. If successful, CC&V will determine how much material can economically be moved to Nevada with preliminary results indicating that at final end state, 20 trucks a day could participate in this program. Initially as part of the proof of concept, CC&V anticipates 1-5 vehicles a day leaving the CCMOD. They will not exceed that number until any potential impacts to Teller County infrastructure have been fully addressed. Both the Colorado Department of Transportation and the Teller County Department of Transportation were formal agency referrals in this process and have no objections. Their comments are contained in Appendix B.

Implementation Schedule

If Amendment 11 is approved, CC&V will begin construction on the essential facilities and infrastructure including utility relocation and pad earthworks, shortly followed by foundation work and High Grade Mill modifications.

Site Description. The current CCMOD acreage is 6,074 acres which includes the recent expansion of 86 acres. All of the activity and proposed development in the Amendment 11 request will be confined to the CCMOD with the exception of a defined number of trucks leaving the CCMOD loaded with heavy ore concentrate to be processed in Nevada. This number will be limited to 1-5 trucks per day during the proof of concept phase and prior to improvements to any county infrastructure being completed. [CR 821, CR 82 Public Improvements Agreement being reviewed].

Existing Structures and Improvements. All existing structures, authorized in the Cresson Mine Development Plan (MDP) and in previous amendments will remain in place. Improvements of existing facilities/structures proposed in Amendment 11 are minimal:
- Increasing the elevation of the East Cresson Overburden Storage Area (ECOSA) by 395 feet;
- Modifying the existing High Grade Mill by expanding the mill platform, installing a semi-enclosed concentrate storage building, and two new flotation tanks to prepare concentrate for shipping off-site for final processing;
- Installation of a new truck scale in close proximity to the high grade mill.

**Zoning.** The site is currently zoned A-1 and abuts other agricultural (A-1) zoned properties, which exist in the form of mining claims in all directions around the CCMOD. Amendment 11 does not propose or request a zone change.

**Infrastructure.** Amendment 11 does not alter existing infrastructure with the exception of modifying the existing High Grade Mill by expanding the mill platform, installing a semi-enclosed concentrate storage building, and the addition of two new flotation tanks which will be used to prepare concentrate for shipping off-site for final processing; A new truck scale will be installed to weigh the trucks with concentrate.

**Access.** Access to the CCMOD will remain as it is currently and will be unaffected by the Amendment 11 proposal.

**Traffic.**
Section 3.D.2(i) of the CCMOD, requires the submittal of a traffic study prepared by a qualified traffic engineer when traffic is projected to increase by 25 or more vehicle trips per day above existing conditions. According to Amendment 11 Submittal materials, the activities associated with Amendment 11 are not expected to cause an increase in traffic greater than 20 vehicle trips per day. To verify this, two traffic studies were completed as part of Amendment 11 that were used for the DRMS permitting and submitted to Teller County. The Traffic Study was conducted by Interstate Engineering. Newmont Corporations (CC&V) purchased the mine in August of 2015. The first study was completed in November 2015 to evaluate the existing mine traffic conditions and assess the construction and operational traffic anticipated by Amendment 11 activities. A second study was completed in December 2016 to assess additional truck traffic anticipated as a result of hauling mill concentrate offsite. In December of 2015, CC&V submitted the Amendment 11 application to DRMS.

Subsequent memos from Interstate Engineering were provided in March and May of 2017 to confirm the December 2016 traffic data were still valid and assess potential impacts to delivery routes from truck traffic associated with shipping mill concentrate offsite for further processing. The latter memo from Interstate Engineering dated May 30th, 2017, assumed 20 trucks (40 truck trips round trip) per day resulting from concentrate shipping. Maximum trucks per day are planned to be no more than 20 (40 truck trips round trip) per day. The May 30, 2017 memo concludes that the assumed 40 truck trips per day will have negligible impacts on traffic operations on Colorado Highway 67 and US Highway 24 in Teller County. Truck options include the following specifications: not to exceed numbers of a gross vehicle weight = 80,000 pounds, vehicle length = 57 feet, vehicle width = 102 inches or 8.5 feet, and vehicle height = 13 feet. The traffic studies submitted with Amendment 11
submittal materials and additional letters are summarized below.

Existing traffic volumes were based on daily traffic counts and 14-hour tube counts taken in August 2015 and again in December 2016 for key roadways around the Cresson Project and at three principal accesses and intersections associated with the Cresson Project and Amendment 11. Traffic count data were expanded in April 2017 to include data from Colorado Highway 67 south of Divide and US Highway 24 east of Divide. CC&V plans to ship concentrate using the following route: Teller County Road 821, Colorado Highway 67, Highway 24, and Interstate 25. If this route was unavailable for any reason, CC&V would be able to stockpile the concentrate material until the route was reopened.

Also contained in CC&V’s submittal were cumulative impacts and updates, including pre-existing impacts, of mine related traffic generating 300 trips per day. CC&V has been responsive to the Teller County Public Works Department and has committed to a Public Improvements Agreement for County Road 821 and County Road 82. The primary purpose of the Public Improvements Agreement is to address the costs associated with the improvements to [821] and maintenance for [82] Teller County roads. The document is currently undergoing legal review and a surety bond will be posted prior to the Board of County Commissioners hearing on this Amendment. CC&V is committed to addressing any potential impacts to roads that may occur from mine activities associated with Amendment 11 and/or the cumulative effects of previous activity and Amendment 11 activity. [See August 23, 2017 letter in Appendix B]

Additionally, primary access to the Chicago Tunnel underground mine operation will be through the Cresson mine site. Access from Silver Street in Cripple Creek will be limited to small amounts of light vehicle traffic only and would not be used to haul ore.

Section 7 – Mine Development Plan Standards

The following standards for a Mine Development Plan to include any Amendments are found in Section 7 of the CCMOD, Appendix A of the Teller County Land Use Regulations:

7.A.2. Noise
Section 7.A.2 defines noise standards at the appropriate locations on adjoining properties and at the Amendment 11 permit boundary (i.e., affected lands boundary), and states that noise levels other than those caused by equipment required for safety shall not exceed applicable State standards. Compliance with the recommendations of a qualified noise expert is generally deemed as demonstration of compliance with the Noise Standard.

CC&V contracted with Engineering Dynamics, Incorporated (EDI) to conduct noise surveys of the activities proposed under Amendment 11 as well as an update to activities already approved under MLE2/Amendment 10. EDI performed detailed noise surveys of the operations in 2008 and 2012. An update to these surveys was performed in 2015 as part of the Amendment 11 application. In addition, actual noise measurements were taken in Poverty Gulch on January 22, 2016, to assess potential noise from operations at the Chicago Tunnel Portal. A copy of the 2015 analysis along with an Addendum dated January 31, 2016, was included in CC&V’s submittal materials. A memo from EDI dated March 20, 2017 confirms the data collected and reported in 2015 and 2016 is valid.
Facilities that have the potential to generate noise emissions under Amendment 11 and previous amendments are as follows:

- Existing mining areas and associated activities (rock drill, shovel, loaders, haul truck, dozer noise)
- Haul roads to new areas (haul truck, grader, dozer noise)
- Ventilation fans with mitigation at the Chicago Tunnel Portal
- Equipment operation (e.g., haul truck, loader, and dozer) at the Chicago Tunnel Portal

The noise analysis included evaluation of existing ambient (baseline) noise levels at several locations within Cripple Creek, Victor, Goldfield, and at the CC&V noise monitoring station.

The noise analysis concluded that the equipment to be used for Amendment 11 activities is the same or similar to what is currently in use at the mine and evaluated in previous noise assessments with the possible addition of ventilation fans used to vent underground mining operations at the Chicago Tunnel Portal in Poverty Gulch and the addition of haul trucks and loading equipment used to load and haul ore from the Chicago Tunnel Portal to the Cresson Project. Simulation of noise was performed with a haul truck, loader, and other equipment at the Chicago Tunnel area. Noise measurements were taken at the property line towards the City of Cripple Creek and near the closest residence. Activities conducted while measurements were taken include loading an empty haul truck, idling equipment, hauling up and down the current haul road, and backing up with back-up alarms. This simulation mirrored the actual activities that could occur at the portal during mining activities. This information was reported in the January 2016 addendum, which is provided in Attachment 11. As a result of the noise receptor analysis and actual noise measurements conducted in January 2016, EDI concluded that noise levels from the Amendment 11 activities, including the Chicago Tunnel Portal operations, will comply with Teller County and State of Colorado commercial noise limits.

7.A.3. Lighting and Glare

Section 7.A.3 requires a demonstration that stationary temporary and permanent lighting is designed and managed to shield adjoining properties from glare to the maximum extent possible, after taking into consideration applicable safety and health requirements for such lighting.

Mine Safety and Health Administration (MSHA) regulations (30 CFR 77.207) requires “illumination sufficient to provide safe working conditions…in and on all surface structures, paths, walkways, stairways, switch panels, loading and dumping sites and working areas.” Lighting within the mining operation is designed to ensure safe working conditions for employees and site visitors. Lighting also is used at the mine for security purposes. Where possible, such as on buildings and other facilities, all lighting is currently or is proposed to be, fully downcast and shielded pursuant to Section 5.5 of the TCLUR. Within the CCMOD, lighting for nighttime operations is designed to maximize visibility while minimizing the external effects of the lighting. For actual mining and haul, recommended industry standard lighting shields are used and lights are placed to shine downward and away from the project perimeter. CC&V has also installed lighting time controls to ensure lighting not controlled by operators is limited to times when lighting is needed. Some areas are controlled by motion sensors to allow activation of lighting only when needed or to alert security guards of unauthorized motion in secured areas. Reduced-glare lighting is used where feasible.
CC&V specific measures to control lighting include:

- Lighting affixed to buildings or poles is designed with hoods or shields to direct the light inward to the operations to maximize the operational visibility (downcast and fully shielded).
- Lights are mainly restricted to and used in, where necessary for safety in active mining areas.
- Portable light stations that are used in mine areas and at the Valley Leach Facilities (VLFs) are directed toward active work areas and away from the project perimeter. There use is limited and of short duration.
- CC&V uses an appropriate amount of light is used to minimize the transient adaptation of employees’ vision when going between light and dark areas.
- Motion detectors and/or timing controls are used for areas around buildings where needed for security purposes.
- Stationary lights are angled downward towards working areas.

CC&V has stated in its application materials that lighting during overburden placement at ECOSA also will be visible to those traveling on County Road 82 and County Road 81 as well as the few houses located to the north and east of the ECOSA. The estimated timing for further construction of the ECOSA is approximately 2016 through 2024 with reclamation occurring for several years thereafter. Portable light sets will be used to light the overburden placement and grading during nighttime hours and equipment headlights also may be visible. The light stations will be moved as overburden placement progresses. As discussed above, the light stations will need to provide adequate lighting to ensure worker safety but will be directed downward and will be shielded to the extent practicable to minimize light pollution. The lighting associated with construction and reclamation of ECOSA will not be directly visible to residents of Cripple Creek, Goldfield or Victor due to topography. Some additional diffuse light may be visible on the horizon for residents of Goldfield but is unlikely to be distinguishable from other lighting associated with the currently-approved mining operation.

Minor extensions of the Schist Island and Globe Hill portions of the North Cresson Mine area and in the South Cresson portion of the Main Cresson Mine area will not result in substantial changes to the approved mine areas and associated changes in nighttime lighting visible to Cripple Creek or Victor. CC&V has stated in its submittal, that the lighting for equipment in the mine areas will be visible for a short period of time until the mine highwalls drop below the original ground surface, which is estimated to occur by roughly year two. Nighttime lighting will be visible from portable light stations and from equipment headlights. Both lighting sources are necessary to provide for worker safety. To the extent practicable, the light stations will be shielded and directed downward to minimize direct glare into Cripple Creek or Victor. In addition, the visual and noise berm approved for the Schist Island/Globe Hill mine areas will be constructed prior to mining activities and has been designed to provide a visual barrier for the town of Cripple Creek. Diffuse lighting will be visible on the horizon.
when looking east from the town of Cripple Creek, but the approximately 30-foot-high noise and visual berm will shield Cripple Creek from direct lighting.

Minimal lighting will be established at the Chicago Tunnel Portal location in Poverty Gulch for worker safety and security purposes and to illuminate work areas. Lights will be designed such that they face inwards, be downcast and shielded, and point towards work areas and away from Cripple Creek.


As described above, two traffic studies were completed as part of the Amendment 11 submittal process. These studies concluded that additional truck traffic associated with Amendment 11 specific activities will have a negligible impact on traffic operations on Teller County roadways. CC&V is committed to working with the Teller County Public Works Department to identify appropriate measures, as necessary, to mitigate impacts from mine related traffic to county roads. Currently, the longer term cumulative effects of mine traffic impacting CR 821 and CR 82 are being addressed as part of the Teller County review. CC&V has concurred with the proposed recommendations of the Teller County Public Works Department and will address both roads through a Public Improvements Agreement. [document currently in legal review]. A surety bond will be posted prior to the BoCC hearing. All proposed designs will be in accordance with all applicable standards and guidelines including, but not limited to, Teller County Roadway Design and Construction Standards, Colorado Department of Transportation (CDOT) guidelines and the Teller County Land Use Regulations. CC&V will submit proposed improvement plans and designs to Teller County for review and approval. Based on existing geotechnical, subsurface conditions and existing pavement conditions, and upon further inspections, the design may include full pavement replacement of the roadway, mill and overlay, Reclaimed Asphalt Pavement (RAP) or a combination thereof.

During operations, CC&V has stated in its application materials that haul road dust will be suppressed using the current dust control methodologies, e.g., water and approved suppression additives. Water application is generally used for dust suppression on short-term roads. Magnesium chloride or other suitable dust suppressants for roads may be used to control dust for prolonged periods. The water used in dust control generally will be supplied from the main water storage tank inside the CCMOD. An ongoing haul road maintenance program within the mine area minimizes the potential to transport excessive mud onto paved County roads, in conformance with requirements of 7.A.4(d).

7.A.5. Sewage Management

The Cresson Project is not serviced by a sewer district. CC&V uses septic vault systems permitted through Teller County for domestic liquid wastes. These existing vault systems are located at (1) the Ironclad facilities area (2) the Arequa Gulch ADR/Lab, (3) the crusher maintenance building, (4) the Ironclad engineering building, (5) the Exploration building near Ajax, (6) the Squaw Gulch ADR and security office, and (7) the High Grade Mill. CC&V contracts with qualified, licensed commercial haulers to transport sewage to the Victor sewage treatment plant for disposal. No new septic systems are proposed as part of Amendment 11. Chemical toilets will continue to be used for the remote parts of the Project area, including at the Chicago Tunnel Portal. These chemical toilets are serviced by a commercial waste hauler.
7.A.6. Visual Resources

Section 7.A.6 requires a demonstration that the activities associated with Amendment 11 and modifications to the MDP have been designed to minimize material adverse impacts to visual resources to the extent feasible as determined by renderings of before-during-after views of representative viewpoints accessible by the public. A Visual Resource Analysis was included with CC&V’s application materials and can be found in Appendix C of this report. A specific Viewshed Conservation Plan for the slopes to be mined and visible from the City of Cripple Creek is described under the reclamation discussion in Section 7.A.12. The visual resource analysis was completed in 2015. CC&V reviewed the contours used to generate the maximum build out and final reclamation views and noted that designs have not changed since the 2015 report was issued. Therefore CC&V states in its application materials, that the visual impacts will not be materially different from what was proposed and approved in Amendment 10.

7.A.7. State and Federal Approval

Amendment 11 was approved by DRMS on February 8, 2017. A copy of the approval letter is provided in Attachment 6 along with copies of the Amendment 11 applications. A full list of active permits and licenses for the operation were presented to the Teller County Planning Department as part of CC&V’s submittal for Amendment 11.

7.A.8. Structures

Additional, temporary support buildings may be constructed at the Chicago Tunnel Portal to support underground mining actives. A small extension will be added to the High Grade Mill to store concentrate. Table 2 below provides information on potential new buildings. All structures will be inside of the CCMOD.

In addition to the structures noted in Table 2, CC&V may construct non-occupied mechanical buildings and communications equipment throughout the permit area. County building, electrical, and mechanical permits will be obtained prior to construction of new structures, if any.

<table>
<thead>
<tr>
<th>Location</th>
<th>Structure Name</th>
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<tbody>
<tr>
<td>Chicago Tunnel Mine Area</td>
<td>Temporary change house</td>
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<tr>
<td></td>
<td>Temporary office building</td>
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<tr>
<td></td>
<td>Temporary mechanics shop</td>
</tr>
<tr>
<td>High Grade Mill</td>
<td>Concentrate storage building, new truck scale, and two new flotation cells</td>
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</tbody>
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An Emergency Response Plan (ERP) was submitted to DRMS and approved and is contained in the submittal materials presented to Teller county. The DRMS approved ERP will remain in effect.
through Amendment 11 and will be periodically reviewed and updated, as needed. CC&V also maintains Spill Prevention, Control and Countermeasure (SPCC) Plan(s) for the site.

The ERP designates the CC&V Mine Rescue Team as the first responders for on-site emergencies due to proximity. CC&V’s Mine Rescue Team members maintain their proficiency through routine training and certification by taking required courses in emergency medical care and rescue operations. Water supply to fight fires and water trucks with a capacity of up to 18,000 gallons are maintained on site. In addition, adequate equipment and neutralizing and absorbent materials for spills of process-related chemicals or solutions are maintained on site. The CC&V Mine Rescue Team may be supplemented by Teller County Emergency Services as needed. CC&V is also committed to assisting Teller County with its teams and expertise, by providing emergency response support and training to the local community when community services require additional resources or experience.

7.A.10. Signs, Berms and Fencing

Fencing, berms, signage, and security gates will continue to be used to protect and warn the public and preclude access to the site as discussed in the CCMOD/MDP for previous submittals (e.g., Mine Life Extension-Amendment 9 and Mine Life Extension 2-Amendment 10). CPW has recommended an 8 foot Wildlife Protection Fence and CC&V submitted No Impact Technical Revision No. 91 to DRMS and will fully comply. The fence will also be an aide to security in addition to protecting wildlife.

Portions of the project area directly accessible to the public are fenced to control access and protect the safety of the public. The Chicago Tunnel Portal area will be fenced once mining begins underground. Gates and security checkpoints are used to restrict access onto the property from public roads.

Signs are posted around the perimeter of the operations to discourage access without permission. Signage is required by DRMS and by the International Cyanide Management Code, to which CC&V is a signatory. DRMS signs typically are informational signs prohibiting access to areas within the permit boundary. A new sign of this type will be placed at the Chicago Tunnel Portal gate. Signs warning of the use of cyanide as required by the International Cyanide Management Code are placed on fencing around the SGADR and SGVLF. In addition, signs notifying of cyanide usage are located at facilities where cyanide solution is used. Signs prohibiting unauthorized access onto CC&V lands surround the operations and will be extended as appropriate as the mine operations change. Signs that are no longer required will be removed.

There will be no new hazardous waste storage areas as part of Amendment 11. As described in the MLE (Amendment 9) and MLE2 (Amendment 10) MDP, hazardous waste storage areas are carefully controlled and include appropriate signage. The limited hazardous waste materials that are generated at the Cresson Project are properly managed and disposed in compliance with applicable Federal and State requirements. These materials, when stored, are placed in appropriate receptacles with required labels. Hazardous waste storage areas are inspected weekly to ensure that they meet State and Federal standards.

Berms are required as per the Mine Safety and Health Administration (“MSHA”) for certain types of haul roads. Haul road berms will be developed and maintained per MSHA requirements. A
visual/noise berm is required for mining operations in the Schist Island and Globe Hill portions of the North Cresson Mine area to minimize visual and noise effects to residents in Cripple Creek. This berm, approved in Amendment 10, is being constructed from salvaged growth medium materials and will be completed prior to initiating mining activities in the Schist Island or Globe Hill mine areas. An existing growth medium stockpile on the south side of State Highway 67 south and east of the AGADR provides a noise and visual berm between the AGADR and associated Arequa Gulch VLF and the town of Victor.

7. A.11. Drainage

Section 7. A.11 requires a demonstration that drainage does not adversely impact downstream properties. Amendment 11 includes an updated Design Report for Stormwater Management for the Cresson Project and a Design Report for Stormwater Management at the Chicago Tunnel Site. These reports were prepared by a qualified professional engineer and were provide by CC&V’s submittal materials. Teller County conducted a 3rd Party Review using the firm of Drexel, Barrell & Company who found the submittal materials and analysis satisfactory [see comments in Appendix B]. CC&V’s also submitted all modifications to previous approved stormwater plans to the DRMS Adequacy Review process and they were found to be adequate.

CC&V submitted plans including surface water diversions which are designed to safely control and convey runoff generated by a 100-year, 24-hour precipitation event. The most downgradient detention basins are designed to contain twice the runoff from the 100-year, 24-hour storm event. These detention basins will function to slow runoff and prevent flooding, sedimentation, and erosion of offsite areas downgradient of the mine. Best management practices used to control drainage are described in the storm water management plan.

7. A.12. Reclamation

Section 7. A.12 requires that reclamation is consistent with the goals and objectives of the Teller County Growth Management Plan and with the CCMOD overlay zone district classifications. The Southeast Teller County Regional Plan is a sub-area plan under the Growth Management Plan, and includes the CCMOD area. The Regional Plan recognizes “land within the CCMOD be reclaimed for wildlife habitat and livestock grazing.”

A full reclamation plan was included in the Amendment 11 sumbittal and approved by DRMS. The objectives, criteria, and procedures of the reclamation and closure plan for the Cresson Project remain consistent with reclamation plan previously approved through Amendments 8, 9 (MLE), and 10 (MLE2) of the DRMS permit and associated Teller County approvals. New facilities proposed by Amendment 11 are addressed in the reclamation plan and will be reclaimed in a similar manner as approved for existing facilities. Of note, CC&V states in its submittal than the concentrate shipping will constitute less than 1% of total tons produced. The amount of material removed from the valley leach facilities is considered negligible and will have no effect on the reclamation of the valley leach facilities.
Upon completion of reclamation and closure of the project, the majority of the affected area will be returned to livestock grazing (rangeland) and wildlife habitat. Significant historic resources will be enhanced in the District through preserving and relocating important historical artifacts (if necessary) to areas accessible to the public, where feasible.

In addition to the site-wide reclamation commitments to re-establish wildlife habitat and grazing as the post-mining land use, CC&V is required to perform reclamation activities consistent with Amendment 9 (MLE) and Amendment 10 (MLE 2) for the North Cresson Mine area to mitigate impacts to aspen stands that comprise a portion of the view of the mine operations area from the city of Cripple Creek.

Following mining in the North Cresson Mine area, the upper portion of the ridge facing the city of Cripple Creek will present a visual contrast of regraded, 2.5H:1V mined slopes above mature aspen and Engelmann spruce stands along the lower portion of the ridge. To better blend the mined land reclamation with the remaining trees, an aspen transplanting program will be initiated. For reclamation bonding purpose, CC&V has estimated that roughly ten (10) acres of aspen transplanting will be needed to extend these aspen stands back into the reclaimed slopes.

North facing slopes within the North Cresson reclamation area will be planted with about 400 stems per acre of one-year aspen seedlings as part of CC&V’s site-wide forest reclamation proposal to further encourage the reestablishment of aspen acreage in the North Cresson reclamation area.


Amendment 11 adds the option for underground mining practices to the existing Cresson Project surface mining operation. Underground operations may initiate at the Chicago Tunnel Portal located in Poverty Gulch. Initial activities may include tunnel rehabilitation and exploration drilling to define underground mineral targets. Based on drill results and resource definition, development rock and ore may be hauled from the Chicago Tunnel to the Cresson Project via haul trucks. As part of its Amendment 11 application to DRMS, CC&V incorporated the Chicago Tunnel/Proper Adit Permit No. M-1988-026 into the Cresson Project Permit No., M-1980-244.

In addition, CC&V proposes to transport concentrated ore from the High Grade Mill for shipment to Newmont’s facilities in Nevada. This project allows for processing of the CC&V material to increase overall gold recovery while providing geochemical benefits to Newmont’s Nevada operations. The process is a best practice within the mining industry which will improve CC&V’s gold production; all production is credited back to CC&V. This activity involves enhancement of the flotation circuit within the High Grade Mill with extension to the mill building to store concentrated ore, minor circuit changes inside the mill, and a new truck scale to weigh shipments prior to leaving the site.
Community Plan. Pursuant to the legislatively adopted Teller County Growth Management Plan (GMP), Staff has reviewed and assessed the request with the GMP and finds the proposed activity is consistent with its purposes, goals, objectives, and policies. The proposed Amendment has been approved by DRMS, will occur inside of the CCMOD with the exception of a limited number of trucks which will leave the CCMOD through established access points bound for Nevada with ore concentrate. The impact of these additional trucks along with existing traffic has been examined through traffic studies for both county and state roads. A public improvements agreement has been drafted and will be executed for CR 821 and CR 82 as mitigation. The state found no additional impacts to their roadways (67 and 24).

Additionally, the reclamation plan remains consistent with the goals and objectives of the GMP. The Southeast Teller County Regional Plan includes the CCMOD which recognizes that “any land within the CCMOD be reclaimed for wildlife habitat and livestock grazing”. Amendment 11 does not change that intent.

2. **SUBMITTAL REQUIREMENTS**

<table>
<thead>
<tr>
<th>SUBMITTAL REQUIREMENT</th>
<th>STAFF COMMENT</th>
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<tbody>
<tr>
<td><strong>Section 3.2</strong></td>
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<tr>
<td>Application Form</td>
<td>Submitted</td>
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<tr>
<td>Title Commitment, Title Guarantee, Attorney’s Title Opinion, or O&amp;E</td>
<td>Submitted</td>
</tr>
<tr>
<td>Adjacent Property Owners (APO) List</td>
<td>Submitted</td>
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<tr>
<td>APO labels</td>
<td>Submitted</td>
</tr>
<tr>
<td>Written statement or narrative describing request, reasons for request, and how the standards for an Amendment pursuant to CCMOD guidelines are met</td>
<td>Submitted</td>
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<tr>
<td><strong>Appendix A: CCMOD, Section 3.D (General and Specific)</strong></td>
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<tr>
<td>Disclosure of Ownership 3.D.2(a)</td>
<td>Submitted</td>
</tr>
<tr>
<td>Proof of Legal Right to Enter and Mine 3.D.2(b)</td>
<td>Submitted</td>
</tr>
<tr>
<td>Documentation of Mailed Notices 3.D.2 (c)</td>
<td>Submitted</td>
</tr>
<tr>
<td>Adjacent Property Owners List 3.D.2 (c ) – <em>same as Section 3.2</em></td>
<td>Submitted</td>
</tr>
<tr>
<td>Mailing Labels or envelopes 3.D.2 (e) – <em>same as Section 3.2</em></td>
<td>Submitted</td>
</tr>
<tr>
<td>Written Description 3.D.2 (f) – <em>same as Section 3.2</em></td>
<td>Submitted</td>
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<tr>
<td>DRMS Application 3.D.2 (g)</td>
<td>Submitted</td>
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<tr>
<td>Permits or Licenses 3.D.2 (h)</td>
<td>Submitted</td>
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<tr>
<td>Traffic Study 3.D.2 (i)</td>
<td>Submitted</td>
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<tr>
<td>Mining Development Plan Map(s) or Drawings 3.D.2 (j)</td>
<td>Submitted</td>
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<tr>
<td>Fees 3.D.2 (k)</td>
<td>Submitted</td>
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<tr>
<td>Historic Resources Information 3.D.2 (l)</td>
<td>Submitted</td>
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### 3. REVIEW AGENCY RESPONSES  
[Appendix B]

<table>
<thead>
<tr>
<th>REVIEW AGENCY</th>
<th>COMMENTS</th>
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<tbody>
<tr>
<td>Teller County Attorney</td>
<td>Comments contained throughout Staff Report.</td>
</tr>
<tr>
<td>City Woodland Park</td>
<td>See letter from Woodland Park dated June 20, 2017 from Sally Riley, Planning Director, City of Woodland Park. See response letter from Newmont (CC&amp;V) dated August 1, 2017 from Meg Burt, Senior Environmental Manager, CC&amp;V. See email from Sally Riley, Planning Director, City of Woodland Park to Dan Williams, Teller County Planner, dated August 3, 2017, stating “the city staff is satisfied that Newmont Mining Corporation has adequately addressed Woodland Park’s truck traffic impacts and concerns”.</td>
</tr>
<tr>
<td>City of Cripple Creek</td>
<td>See letter from the City of Cripple Creek, dated June 30, 2017 from Mr. Ray Dubois, City Administrator. See response email from Ms. Meg Burt, CC&amp;V Senior Environmental Manager, dated August 9, 2017. See email from Mr. Ray Dubois dated August 10, 2017 stating “The City of Cripple Creek (City) finds the responses provided below by Newmont Mining Company/Cripple Creek &amp; Victor Gold Mining Company (CC&amp;V) materially address the issues and requests made by the City in its comments to Teller County on June 30, 2017.</td>
</tr>
<tr>
<td>City of Victor</td>
<td>See letter via email dated July 30, 2017 from Ms. Debra Downs, City Administrator, City of Victor. See response letter dated August 2, 2017, from Ms. Meg Burt, Senior Environmental Manager, CC&amp;V. See email received from Ms. Debra Downs, City of Victor on August 2, 2017 stating, “The City has received this letter from CC&amp;V Gold Mine in response to our comments. “We are satisfied with their answers”</td>
</tr>
<tr>
<td>Drexel, Barrell &amp; Co Engineering 3rd Party Review</td>
<td>See letter dated July 7, 2017 from Mr. Tim McConnell, P.E., Drexel, Barrell &amp; Co. See response letter dated July 31, 2017 from Ms. Meg Burt, Senior Environmental Manager, CC&amp;V. See response email dated August 1, 2017 from Mr. Tim McConnell, P.E. stating, “I am writing to let you know that we have no remaining comments regarding our CC&amp;V Amendment 11 review”.</td>
</tr>
<tr>
<td>Colorado Department of Transportation</td>
<td>See letter dated July 7, 2017 from Ms. Valerie Sword, CDOT Permits Manager. See response letter dated August 3, 2017 from Ms. Meg Burt, Senior Environmental Manager, CC&amp;V. See subsequent email response from Ms. Valerie Sword, dated August 9, 2017, “…Your revised letter is acceptable to CDOT, with NO highway improvements or Access Permit.”</td>
</tr>
<tr>
<td>Teller County Public Works – Teller County Depart of Transportation</td>
<td>See memorandum dated June 27, 2017. “CC&amp;V has submitted a proposal committing to make and fund improvements to CR 821 from Highway 67 to CR 821.” “CC&amp;V has submitted a proposal committing to partner and collaborate with Teller County Public Works</td>
</tr>
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</table>
TCPW) with regards to the long term management/maintenance solution for CR 82 from Highway 67 to CR 82. “As long as any approval is conditioned on the successful execution of a properly collateralized improvements agreement (IA), TCPW has no concerns.” Bryan Kincaid, Rights-of-Way Supervisor, Teller County Department of Transportation.

<table>
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<tr>
<th>Agency</th>
<th>Notes</th>
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<tr>
<td>Division of Reclamation and Mining Safety (DRMS)</td>
<td>See email dated June 27, 2017. The Division has worked with Teller County on the Amendment 11 approval process conducted at the State level and has no additional comments at this time. If the plan approved by Teller County diverges significantly from the plan previously approved at the State level, the Operator can revise the State plan as necessary. Wally Erickson, Senior Environmental Protection Specialist, DRMS. Also see letter dated May 1, 2017, DRMS formal notice to Teller County that CC&amp;V has submitted all necessary documentation pursuant to and satisfactory to the Division for Amendment 11. Tim Cazier, P.E, Environmental Protection Specialist, DRMS.</td>
</tr>
<tr>
<td>USDA Forest Service</td>
<td>See email dated June 9, 2017. At this time, I have no comments on the Victor Gold Mine, as it does not affect NFS lands. Amy Titterington, P.G, CMA 1, Geologist, USDS Forest Service, South Park Ranger District.</td>
</tr>
<tr>
<td>Teller County Building and Environmental Department</td>
<td>See letter dated June 7, 2017. No issues with the following conditions: All applicable building permits will be required for any new building, or alterations to existing buildings and all applicable Environmental Health permits will be required for any new septic systems or vaults. Terry Brunette, Teller County Building Official.</td>
</tr>
<tr>
<td>Colorado Department of Natural Resources – Water Division</td>
<td>See email sent on 19 June 2017. No objections as long as mine boundary does not exceed that boundary description decreed in combined Case Nos. 02CW122 and 10CW31 in Division 2 Water Court. Melissa Peterson, P.E, Water Resource Engineer, Team 237 Leader, DNR. {DRMS Permit Boundary has not changed }</td>
</tr>
<tr>
<td>Colorado Parks and Wildlife</td>
<td>See letter dated August 9, 2017. Also letter dated June 17, 2017. No additional comments other than those outlined in June 17, 2017 letter. 250 meter buffer around Townsend’s Big Eared Bat Roost Sites, erosion recommendation and the 8-foot tall woven wire wildlife fence. Frank McGee, Area Wildlife Manager, CPW Area 14</td>
</tr>
<tr>
<td>Teller County Office of Emergency Management</td>
<td>No comments received</td>
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<tr>
<td>State Historical Society</td>
<td>No comments received</td>
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<td>BLM</td>
<td>No comments received</td>
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4. **DISCUSSION OF MAJOR CONCERNS AND ISSUES**

Staff has no major concerns with this request. Pursuant to guidance contained in our Teller County Land Use Regulations, “Teller County recognizes that State and Federal agencies have programs in place to permit, inspect, and enforce requirements at mining operations to assure protection of the environmental resources associated with such mining operations. It is the intent of Teller County to assure that the local land use planning and zoning requirements are addressed without unnecessary duplication of or in contradiction with, the pertinent State and Federal requirements”. Federal and State agencies were formal agency referrals to include the Division of Reclamation and Mining Safety (DRMS) in the Teller County Process to amend our map, and we participated in the DRMS process for their oversight of proposed Amendment 11. Staff assessed the request by applying the guidelines and the 13 standards contained in Appendix A of the CCMOD to the Teller County Land Use regulations pertaining to Mining Development Plans and Amendments to them. An independent 3rd Party Review of all geotechnical, engineering, hydrology and drainage aspects of the proposed amendment was conducted at our request by the Drexel, Barrell & Company and they found the materials presented to be satisfactory and to standard. DRMS conducted a 1 ½ year long review and approved Amendment 11 at the State level, examining all submittal materials in great detail and conducting numerous inspections. Teller County Staff, the CDSD Director and the Teller County Planner, reviewed proposed Amendment 11 development and activities on the ground in site visits inside of the CCMOD as well.

Where referral agencies consulted in our process asked for additional material, studies, or information, CC&V provided those responses which are contained behind the appropriate referral letters in Appendix B. The cities of Woodland Park, Victor and Cripple Creek were provided a full set of application materials and had an opportunity to comment. In the case of all three cities, questions raised by individual city leadership were answered in writing by CC&V and those responses are contained in Appendix B. Follow-on correspondence received from each city is also contained in Appendix B. All three cities indicate support of the Amendment, with one city, Cripple Creek, requesting a condition of approval along with its support.

In terms of impact to Teller County staff found there was impact to two Teller County Roads, 821 and 82. Amendment 11 specific development traffic cannot be considered in isolation and the material contained in the submitted traffic studies along with pre-existing known traffic impacts were considered by staff [Amendment 10 to present]. Additionally, CC&V’s submittal to both DRMS and to Teller County indicated the potential of 300 trips per day. As a result, and as part of this review, Teller County and CC&V have developed a proposed solution for decision by the Board of County Commissioners. A draft Public Improvements Agreement (PIA) that addresses improvements to CR 821 and the maintenance of CR 82 is currently in legal review. This PIA is a condition of approval of Amendment 11. A surety bond addressing these improvements will be in place prior to any hearing with the BoCC. Essentially, CC&V will pay for the yearly maintenance costs of CR 82, which will remain a gravel road. CR 821 will undergo improvements in terms of re-surfacing and as appropriate, widening. Costs to maintain CR 82 on an annual basis is approximately $15,000 dollars while the re-surfacing of CR 821 will cost approximately 1.7 million dollars.
Public Comment. Notices of this Planning Commission meeting were sent to all adjacent property owners. As of the writing of this report, no written comment was received from the public.

5. STAFF FINDINGS

Section 7, Mining Development Plan (MDP) Standards, found in Appendix A of the Cripple Creek Mining Overlay District (CCMOD) of the Teller County Land Use Regulations (LUR) apply to mining development plans and amendments to them. Staff assessed Amendment 11 against the 13 standards. Additionally, the requirements of Section 3.D submittal requirements or, as appropriate, (Section 8.A.1 Submittal or Section 8.B.1 Submittal are fulfilled).

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<th>CRITERIA</th>
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<tr>
<td><strong>Consistent with Master Plan.</strong> Whether the proposed amendment is consistent with the purposes, goals, objectives and policies of all applicable legislatively adopted Teller County master plan(s) or map(s).</td>
<td>This standard is met. The proposed MDP Amendment 11 is consistent with the purposes, goals, objectives and policies of the Teller County Growth Management Plan, the CCMOD guidelines and regulations, and the reclamation plan remains consistent with the Southeast Teller County Regional Plan, and maintains the historic buffer areas.</td>
</tr>
<tr>
<td><strong>Section 7, MDP – 7.A.1 Submittal Requirements</strong> The submittal requirements for both Chapter 3.C and Appendix A, Section 3.D of the Teller County Land Use Regulations must be met.</td>
<td>This standard is met. The proposed Amendment 11 Application was complete in its submittal as required, and was approved by DRMS in February of 2017 subject to Teller County’s final approval.</td>
</tr>
<tr>
<td><strong>Section 7, MDP – 7.A.2 Noise</strong> defines noise standards at the appropriate locations on adjoining properties and the Amendment 11 permit boundary. “Noise levels other than those caused by equipment required for safety shall not exceed applicable state standards.</td>
<td>This standard is met. Teller County does not have unique noise standards and uses the state standard. CC&amp;V contracted Engineering Dynamics Incorporated (EDI) and conducted a noise receptor analysis and actual noise measurements. EDI concluded that noise levels currently and those proposed to increase in Amendment 11 still comply with the Colorado residential noise limit.</td>
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<td>CRITERIA</td>
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<td><strong>Section 7. MDP – 7.A.3 Lighting and Glare</strong></td>
<td><strong>This standard is met.</strong> Mine Safety and Health Administration (MSHA) regulations (30 CFR 77.207) requires “illumination sufficient to provide safe working conditions… in an on all surface structures, paths, walkways, stairways, switch panels, loading and dumping sites and working areas”. Where possible, such as on buildings and other facilities, all lighting is current or is proposed to be, fully downcast and shielded pursuant to Section 5.5 of the TCLUR.</td>
</tr>
<tr>
<td>requires a demonstration that stationary temporary and permanent lighting is designed and managed to shield adjoining properties from glare to the maximum extent possible, after taking into consideration applicable safety and health requirements for such lighting.</td>
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<tr>
<td><strong>Section 7. MDP – 7.A.4 Public Roads</strong></td>
<td><strong>This standard is met as conditioned (PIA).</strong> Several traffic studies were completed as part of the Amendment 11 process. These studies concluded that additional truck traffic associated with Amendment 11 specific activities would have a negligible impact on traffic operations on Teller County roadways. CC&amp;V is committed to working with the Teller County Public Works Department to identify appropriate measures, if necessary, to mitigate impacts to county roads. Currently, the longer-term cumulative effects of mine traffic associated with CR 821 and CR 82 do have impact and CC&amp;V has concurred with the recommendations of the Teller County Public Works Department and will address both roads. [See 23 August 2017 Improvements Commitment letter in Appendix D], A draft PIA is in legal review and a surety bond will be in place prior to any hearing by the Board of County Commissioners.</td>
</tr>
<tr>
<td>Demonstrates that existing County roads serving the site are adequate for the anticipated load increase as a result of precious metal mining-related activities. Addresses increased traffic, if any. Identifies steps/procedures pursuant to the Teller County Roadway Design and Construction Standards to mitigate unsafe or inadequate road design or construction. Will not transport excessive mud onto paved County roads. Has secured all access and/or other permits required by the Teller County Roadway Design and Construction Standards; and any traffic study is accompanied by a plan prepared by a qualified traffic engineer to mitigate capacity and safety concerns, and documentation exists that the plan will be implemented and is sufficient to determine that this Public Road standard has been met.</td>
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<tr>
<td><strong>Section 7. MDP – 7.A.5 Sewage Management</strong></td>
<td><strong>This standard is met.</strong> The Cresson Project is not serviced by a sewer district. CC&amp;V uses septic vault systems permitted through Teller County for domestic liquid wastes. These existing vault systems are located at (1) the Ironclad facilities area (2) the Arequa Gulch ADR/Lab, (3) the crusher maintenance building, (4) the Ironclad engineering building, (5) the Exploration building near Ajax, (6) the Squaw Gulch ADR and security office, and (7) the High Grade Mill. CC&amp;V contracts with qualified, licensed commercial</td>
</tr>
<tr>
<td>The MDP or change in a MDP pursuant to Section 8 Amendment to a Mining Development Plan, documents that, as necessary, a sewer and/or septic system plan prepared by a qualified engineer exists that demonstrates compliance with all applicable local, State, and federal standards.</td>
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<td>haulers to transport sewage to the Victor sewage treatment plant for disposal. No new septic systems are proposed as part of Amendment 11.</td>
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#### Section 7. MDP – 7.A.6 Visual Resources

In areas of new proposed precious metal mining activities, the MDP or change in a MDP pursuant to Section 8 Amendment of a Mining Development Plan, demonstrates that the project minimizes material adverse impacts to visual resources to the extent feasible, as determined by renderings of before-during-and after views of representative viewpoints accessible by the general public, except of areas within the CCMOD open to the public by express agreement, or private property, around the proposed project area.

**This standard is met.** The visual resource analysis was completed in 2015. CC&V reviewed the contours used to generate the maximum build out and final reclamation views. Therefore CC&V states in its application materials, that the visual impacts will not be materially different from what was proposed and approved in Amendment 10. A memo dated April 3, 2017 from Geosyntec Consultants, Inc., who developed the visual resource analysis, confirms the information provided.

#### Section 7. MDP – 7.A.7 State and Federal Approvals

The MDP or change in a MDP pursuant to Section 8 Amendment of a Mining Development Plan, documents that all required State and federal permit or license approvals are or will be obtained prior to initiating activities regulated by such approvals, including such permits or licenses for controlling dust, impacts to off-site wells, fumes and odors, vibration and blasting, hazardous materials and erosion.

**This standard is met.** Amendment 11 was approved by DRMS on February 8, 2017. A copy of the approval letter was provided to Teller County in its submittal materials. A full list of active permits and licenses for the operation were presented to the Teller County Planning Department as part of CC&V’s submittal for Amendment 11.
| CRITERIA |
|------------------|--------------------------------------------------|
| **Section 7. MDP – 7.A.8 Structures** | **STAFF FINDINGS** |
| The MDP or change in a MDP pursuant to *Section 8 Amendment of a Mining Development Plan*, demonstrates that all proposed structures meet, or will meet the requirements of the then-current Teller County Building Code and related federal, state, and local codes and regulations including plumbing and electrical codes, sewage disposal regulations, fire codes, the provisions of these CCMOD Regulations, and applicable provisions of the Teller County Land use Regulations. No structure may interfere with the easements for public utilities recorded in the public records of Teller County. | This standard is met. Additional, temporary support buildings may be constructed at the Chicago Tunnel Portal to support underground mining activities. A small extension will be added to the High Grade Mill to store concentrate. All structures will be inside of the CCMOD. In addition to the structures noted in Table 2, page 10 of this Staff Report, CC&V may construct non-occupied mechanical buildings and communications equipment throughout the permit area. County building, electrical, and mechanical permits will be obtained prior to construction of any new structures. |

| **Section 7. MDP – 7.A.9 Emergency Response** | **STAFF FINDINGS** |
| The MDP or change in a MDP pursuant to *Section 8 Amendment of a Mining Development Plan*, documents that the operation will adopt and administer a fire protection plan and an emergency response plan that demonstrates that adequate resources are available to provide timely response to potential emergency situations, including hazardous materials transportation accidents. | This standard is met. An Emergency Response Plan (ERP) was submitted to DRMS and approved and is contained in the submittal materials presented to Teller County. The DRMS approved ERP will remain in effect through Amendment 11 and will be periodically reviewed and updated, as needed. CC&V also maintains Spill Prevention, Control and Countermeasure (SPCC) Plan(s) for the site. Water supply to fight fires and water trucks with a capacity of up to 18,000 gallons are on site. In addition, adequate equipment and neutralizing and absorbent materials for spills of process-related chemicals or solutions are maintained on site. |

<p>| <strong>Section 7. MDP – 7.A.10 Signs, Berms, and Fencing</strong> | <strong>STAFF FINDINGS</strong> |
| The MDP or change in a MDP pursuant to <em>Section 8 Amendment of a Mining Development Plan</em>, demonstrates adequate placement of signs, berms, fencing or other warning and exclusion practices to protect and warn the public and to preclude access where necessary for public safety to the extent reasonably possible. | This standard is met. Portions of the project area directly accessible to the public are currently fenced to control access and protect the safety of the public. The Chicago Tunnel Portal area will be fenced once mining begins underground. Gates and security checkpoints are used to restrict access onto the property from public roads. Signs are posted around the perimeter of the operations to discourage access without permission. A wildlife fence will be constructed pursuant to CPW referral comments to Amendment 11 and Technical Revision No. 91 for the fence was submitted to DRMS on 31 August 2017. |</p>
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<td><strong>Section 7. MDP – 7.A.11 Drainage</strong> The MDP or change in a MDP pursuant to <em>Section 8 Amendment of a Mining Development Plan</em>, demonstrates that drainage does not adversely impact downstream properties. Documentation that the drainage report, and the drainage sediment, and erosion control plan, and the storm water management plan, each prepared by a qualified professional engineer and submitted and approved in conjunction with State permitting or licensing requirements, will be implemented satisfies this standard.</td>
<td><strong>This standard is met.</strong> Amendment 11 includes an updated Design Report for Storm water Management for the Cresson Project and a Design Report for Storm water Management at the Chicago Tunnel Site. These reports were prepared by a qualified professional engineer and were submitted to both DRMS and to Teller County. A 3rd party review by Drexel Barrell &amp; Co. on behalf of Teller County found them to be satisfactory. DRMS also accepted the reports as part of their approval of Amendment and a memo compiling the modifications made to storm water designs through the DRMS Adequacy Review process was provided to Teller County by CC&amp;V in their submittal materials.</td>
</tr>
<tr>
<td><strong>Section 7. MDP – 7.A.12 Reclamation</strong> Reclamation proposed is consistent with the goals and objectives of the Teller County Growth Management Plan (Teller County Master Plan) and with the CCMOD underlying zone district classification</td>
<td><strong>This standard is met.</strong> A component of the Master Plan, the Southeast Teller County Regional Plan as part of the Growth Management Plan includes the CCMOD area. The Regional Plan recognizes “land within the CCMOD be reclaimed for wildlife habitat and livestock grazing.” The objectives, criteria, and procedures of the reclamation and closure plan for the Cresson Project have been previously approved through Amendments 8, 9 (MLE), and 10 (MLE2) of the DRMS permit and associated Teller County approvals and remains unchanged in Amendment 11 with land being reclaimed for wildlife habitat and livestock grazing. New proposed facilities are addressed in the reclamation plan and will be reclaimed in a similar manner as approved for existing facilities. Of note, the concentrate shipping will constitute less than 1% of total tons produced. The amount of material removed from the valley leach facilities is considered negligible and will have no effect on the reclamation of the valley leach facilities.</td>
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### CRITERIA

**Section 7. MDP – 7.A.13 New Technologies or Mining Practices**

Implementation within the CCMOD of technologies or mining practices not being used within the CCMOD at the time of the adoption of these CCMOD Regulations, or implemented subsequent to the approval of a new MDP, do not negatively impact any of the foregoing Section 7.

### STAFF FINDINGS

**This standard is met.** Amendment 11 adds the option for underground mining practices to the existing Cresson Project surface mining operation. Underground operations may initiate at the Chicago Tunnel Portal located in Poverty Gulch. Initial activities may include tunnel rehabilitation and exploration drilling to define underground mineral targets. Based on drill results and resource definition, development rock and ore may be hauled from the Chicago Tunnel to the Cresson Project via haul trucks. As part of its Amendment 11 application to DRMS, CC&V incorporated the Chicago Tunnel/Proper Adit Permit No. M-1988-026 into the Cresson Project Permit No., M-1980-244. In addition, CC&V proposes to transport concentrated ore from the High Grade Mill for shipment to Newmont’s facilities in Nevada. This project allows for processing of the CC&V material to increase overall gold recovery while providing geochemical benefits to Newmont’s Nevada operations. The process is a best practice within the mining industry which will improve CC&V’s gold production.

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6. **RECOMMENDED MOTION**

The Teller County Planning Commission recommends to the Board of County Commissioners, that it approve a request by the Newmont Mining Corporation, Cripple Creek & Victor Gold Mining Company (CC&V), to approve Amendment 11 for the Cresson Project, Permit No. M-1980-244-Mine Development Plan (MDP) on land zoned Agricultural (A-1) located in the Northeast Quarter of Section 24 and the Southeast Quarter of Section 13, Township 15 South, Range 70 West and across the Southwest Quarter, the Northwest Quarter, and the Northeast Quarter of Section 18, Township 15 South, Range 69 West of the 6th Principal Meridian, Teller County, CO (Cripple Creek & Victor Gold Mining Company, 100 North 3rd Street, Victor Colorado 80860), incorporating staff’s findings as contained in the Staff Report dated August 29, 2017, and further finding that the application complies with such pertinent, individual conditions of use specified in approving a modification to an approved Mine Development Plan (MDP), is compatible with the general provisions of the Teller County Land Use Regulations for precious metal mining within the Cripple Creek Mining Overlay District (CCMOD), and that satisfactory provisions and arrangements have been made concerning the criteria for approval, and with adoption of the
following CONDITIONS OF APPROVAL:

A. Approval of Amendment 11 to the Cresson Project M-1980-244 Mine Development Plan (MDP) does not imply, indicate nor suggest approval or likelihood or availability of approval of, nor does it in any way approve or grant, any subsequent amendments, necessary zoning, platting or other development applications or requests related to the Cresson Project DRMS Permit No. M-1980-244 Mine Development Plan (MDP).

B. The Colorado Division of Reclamation Mining and Safety (DRMS) incorporated DRMS permit No. M-1988-026 (Chicago Tunnel and Proper Adit) 110 low impact permit into the current DRMS Cresson Project permit, M-1980-244, placing all mining conducted by CC&V under one Section 112(d) reclamation permit in its February 28, 2017 approval of Amendment 11. Therefore, the April 12, 1988 Teller County Conditional Use Permit No. CUP-026 issued for the Chicago Tunnel and Proper Adit mine, described as 5.16 acres in the N1/2 of the SW1/4, Section 18, Township 15 South, Range 69 West of the 6th P.M., is hereby extinguished, null and void and is of no effect.

C. The terms and conditions contained in that Public Improvements Agreement and as stated in the August 23, 2017 commitment letter contained in appendix D of this staff report. Said agreement by the Cripple Creek and Victor Gold Mining Company for County Roads 821 and 82 shall be fulfilled in a timely manner and pursuant to those terms and conditions contained therein. Further, that no more than 5 heavy trucks with gold ore concentrate will be permitted to leave the CCMOD on those roads, or any other Teller County roads, until all of the improvements outlined in said document have been completed and inspected to the satisfaction of the Teller County Public Works Department and the Planning Department notified in writing of such. CC&V shall enter into a reimbursement agreement with the Teller County Department of Transportation (TCDOT) on County Road 82 (CR 82), agreeing to a reimbursement plan not to exceed $15,000 per year through the estimated life of the mine, currently 2025.

D. CC&V pursuant to its agreement contained in that August 9, 2017 letter [attached to the Staff report] completes a comprehensive traffic study and targeted traffic-related Social Impact Assessment (SIA) at the request of the City of Cripple Creek, to evaluate the overall impacts of traffic on the economies of Victor and Cripple Creek. Said study is to be completed in 2018 after peak traffic month data is compiled but no later than December 31, 2018. A copy of the final report will be sent to the Teller County Planning Department and to the cities of Cripple Creek and Victor.

E. That the Wildlife Fence be constructed pursuant to the Colorado Parks and Wildlife recommendation and as outlined in the No-Impact Technical Revision [wildlife fence - TR 91] submitted by CC&V to the Colorado Division of Reclamation Mining and Safety (DRMS) on 31 August 2017 pursuant to the timeline submitted in that document.

F. The terms and conditions contained in that “Contractual Agreement for Victor-Goldfield Buffer Area and Cripple Creek Historic/Recreation Area Related to the Cripple Creek Mining District” recorded 06/27/2000 at Reception No. 506476, and
Resolution 09-12-2012(39) approving MLE2 recorded at Reception No. 656481 remain in full force and effect.

G. CC&V shall post a financial surety bond for $1,785,975 equaling the estimate defined in the HDR report plus a 25% contingency. (CR 821) prior to any hearing by the Board of County Commissioners.

H. All applicable building permits will be applied for and obtained prior to the construction of any new building, or alterations to existing buildings being made, and all applicable Environmental Health permits will be obtained for any new septic systems or vaults.

I. Unless otherwise modified by these conditions, all material representations of the Applicant in its submittal material and in public hearings shall be considered binding.
APPENDIX A: MAPS
Aerial Photo
Impact to CR 821 and 82 addressed in a Public Improvements Agreement.

CR 821 to be re-surfaced

CR 82 maintenance costs to be paid by CC&V. Will remain unimproved (gravel)
APPENDIX B:
REFERRAL AGENCIES
City of Woodland Park
June 20, 2017

Dan Williams  
Planner  
Teller County Community Development Services  
PO Box 1886  
Woodland Park, CO 80866

RE: Cripple Creek & Victor Gold Mining Co  
Amendment 11, Mining Development Plan

Dear Mr. Williams,

Thank you for the opportunity to review and comment on this application. We appreciate the continued partnership building with Teller County. The City has the following comments:

1. The application indicates that active mining is anticipated to continue through 2024. We understand that the operation is subject to many variables, but based on this application there could be significant impacts to the community when the active mining is complete in seven short years.

For the purposes of planning, it would be helpful to understand the anticipated workforce at the operation during closure and reclamation of the site, as well as the current workforce living in Woodland Park that might be expected to leave the area when mining is completed.

It would also be invaluable for the City to understand if the opening of underground mining operations, or other Amendment 11 activities, will increase the employee numbers at the mining operation. Woodland Park enjoys nearly 30% of the employees living in Woodland Park, at last count, and we would anticipate that level would continue if employees are added to the workforce.

City of Woodland Park  
220 W. South Avenue – PO Box 9007  
Woodland Park, CO 80866  

719-887-9246  
Fax 719-887-5252  
city-woodlandpark.org
2. The major impact to Woodland Park from the mining operations is the heavy truck traffic on Highway 24 through town. The application narrative describes plans to ship concentrate on State Highway 67, US Highway 24, and Interstate 25 north. We are, however, confused about what the change in those impacts will be with this application. Vehicle Trips per Day (VTD) is defined by the Teller County Land Use Regulations, CCMOD as: A vehicular trip in one direction only, "in and out" constitute two vehicle trips. The increase in truck traffic proposed with Amendment 11 is found in the following sections:

- MDP Submittal Requirements item 9., 3.D.2(i) 20 VTD, 40 round trips.
- Interstate Engineering, May 30, 2017 letter to Erik Munroe, 20 VTD.
- Technical Revision #89, March 9, 2017 letter to Lynda Morgan, up to 25 trucks per day (but also indicates that the current proposal remains below the VTD approved with Amendment 10. However Am 10 did not include impacts of conversion to solution Cyanide.)
- Interstate Engineering, Analysis December 2016, Revised May 2017, maximum of 20 trucks loaded with concentrate. Additions represent an increase in maximum potential truck traffic from 72 to 87 trucks per day, 144 to 177 round trips.
- Traffic Study Update – Delivery of Operating Supplies spreadsheet. Concludes 87 maximum potential trucks per day.
  - While this spreadsheet is quite generous with rounding up the number of trucks, it is unclear how the Maximum Potential trucks per day is shown for:
    - HG Mill, Cyanide, 104 trucks/year, 0 Max Potential
    - HG Mill, Cement, 560 trucks/year, 0 Max Potential
    - HG Mill, Concentrate, 9,224 trucks/year, 20 Max Potential
    - ADR2, Cyanide, 414 trucks/year, 1 Max Potential
- Newmont, May 17, 2017 letter to Dan Williams, #4e. "CC&V proposes a maximum of 23 additional trucks per day."
  - Addendum memo from Interstate Engineering dated May 4th, 2017, assumed 26 trucks (56 round trip) per day resulting from concentrate shipping, lime delivery and cyanide delivery." Actual truck trips per day are expected to range between 17 and 23 (34 to 48 round trips)."

3. The letter from Interstate Engineering, dated May 30, 2017 to Erik Munroe. Based on the CDOT traffic counts the percentage increase of traffic volume on US 24 is approximately 0.2% with an increase in truck traffic of approximately 8.0%. This conclusion is apparently based on the estimate of 20 trucks per day, 40 round trips. The addition of 25 trucks, 50 round trips, would equate to a 10% increase in trucks per day on US 24.
While a 10% increase in trucks on US Highway 24 east of Divide is anticipated to have a negligible impact on traffic operations, an increase of 40-50 trucks on US 24 through Woodland Park will have a visible impact to downtown.

Woodland Park would request that the applicant, Newtown CCV, require vendors delivering supplies to the mine site adhere to these considerations:

- Respect the speed limit through Woodland Park, particularly the 30 MPH downtown.
- No use of Jake Brakes within and approaching the City Limits.
- Travel in the left traffic lanes, away from the sidewalks, as much as possible through town.

Woodland Park would also request Newtown's consideration of participation in ongoing planning and possible projects such as installation of signs regarding Jake Brakes, truck route (i.e. reliever route) around town, pedestrian safety downtown and other traffic calming activities.

Again, thank you for your consideration of the City of Woodland Park's comments regarding the CC&V Amendment 11 application. Please feel free to contact me if you have any questions, or require clarification.

Sincerely,

Sally Riley, AICP
Planning Director
August 1, 2017

SENT VIA EMAIL.

Ms. Sally Riley
Planning Director
City of Woodland Park
220 W. South Avenue / PO Box 9007
Woodland Park, CO 80866

RE: Responses to Comments from the City of Woodland Park, Colorado
Regarding Amendment 11 Application for Cripple Creek and Victor Gold Mine (CCV)
Teller County Mine Development Plan (MDP)

Dear Ms. Riley:

Cripple Creek & Victor Gold Mining Company is in receipt of the City of Woodland Park’s June 20, 2017 letter to Mr. Dan Williams of the Teller County Community Development Services. Please see the following information in response to the City’s comments.

City of Woodland Park Comment #1
The application indicates that active mining is anticipated through 2024. We understand that the operation is subject to many variables, but based on this application there could be significant impacts to the community when active mining is complete in seven short years.

For the purposes of planning, it would be helpful to understand the anticipated workforce at the operation during closure and reclamation of the site, as well as the current workforce living in Woodland Park that might be expected to leave the area when mining is completed.

It would also be valuable for the City to understand if the opening of underground mining operations, or other Amendment 11 activities, will increase the employee numbers at the mining operations. Woodland Park enjoys nearly 30% of the employees living in Woodland Park, at last count, and we would anticipate that level would continue if employees were added to the workforce.

CC&V Response:
The current life of mine end date is 2025, which is based on currently identified mineral resources. Every year we continue to explore and further refine our understanding of the resource at CC&V. Furthermore, Newmont has an annual business planning process that re-evaluates our understanding of the mineral resource and the most efficient way to develop it. This process can affect the projected life of mine and so can the price of gold.
We understand the potential impact to the community when mining is completed. While mining may cease in 2025, ore processing will continue through 2032 with final reclamation scheduled for completion in 2041.

To the City’s question regarding level of employment beyond mining, we anticipate the number of employees to decrease to approximately 60 employees from the current approximately 610 (please see the Economic Effects Analysis that was submitted to Teller County as part of the Amendment 10 Mine Development Plan application, September 2012). We expect this number will drop even further in 2032 to approximately 10 employees when processing operations are completed and CC&V moves into final reclamation and long-term monitoring. Lastly, we do not anticipate the activities associated with underground mining or other Amendment 11 activities to add significantly to CC&V’s total employee count.

Woodland Park Comment #2
The major impact to Woodland Park from the mining operations is the heavy truck traffic on Highway 24 through town. The application narrative describes plans to ship concentrate on State Highway 67, US Highway 24, and Interstate 25 north. We are, however, confused about what the change in those impacts will be from this application. Vehicle Trips per Day (VTD) is defined by Teller County Land Use Regulations, CC&V as: A vehicular trip in one direction only. "in and out" constitutes two vehicle trips.

CC&V Response:
We understand how the evolution of shipping activities planned with Amendment 11 could be confusing to the reviewer and we appreciate the opportunity to explain. The attached table summarizes the truck counts for CC&V by permit amendment starting with Amendment 9. The farthest column to the left shows the most up to date information on truck counts by functional area of the mine site. As one can see there is an overall increase in trucks traveling to the site of 16 trucks per day (31 Vehicle Trips per Day (VTD) round trip) with Amendment 11 over what was previously approved under Amendment 10. This includes the 20 trucks per day for concentrate shipments, which is partially offset by a reduction in 4 trucks per day of construction related vehicles (e.g., cement trucks, supply deliveries, etc.) that are no longer needed now that Amendment 10 construction activities are substantially complete.

Woodland Park Comment #3
The letter from Interstate Engineering, dated May 3, 2017 to Erik Miano. Based on the CDOT traffic counts the percentage increase of traffic volume on US 24 is approximately 0.2% with an increase in truck traffic of approximately 8.0%. This conclusion is apparently based on the estimate of 20 trucks per day, 40 round trips. The addition of 24 trucks, 30 round trips, would equate to a 10% increase in trucks per day on US 24.

While a 10% increase in trucks on US Highway 24 east of Divide is anticipated to have a negligible impact on traffic operations, and increase of 49 to 59 trucks on US 24 through Woodland Park will have a visible impact to downtown.

Woodland Park would request that the applicant, Newmont CCV, require vendors delivering supplies to the mine site adhere to the operations.
- Respect the speed limit through Woodland Park, particularly the 30 MPH downtown/
- No use of Jake Brakes within and approaching the City Limits.
- Travel in the left traffic lanes, away from the sidewalks, as much as possible through town.

Woodland Park would also request Newmont's consideration of participation in ongoing and possible projects such as installation of signs regarding Jake Brakes, truck route (i.e., reliever route) around town, pedestrian safety downtown and other traffic calming activities.

CC&V Response:
As noted in our response to Comment # 2, the actual increase in truck traffic expected with this Amendment 11 is 16 trucks (32 VTD). CC&V retained Interstate Engineering, Inc., a qualified engineering firm, to assess the impacts of these additional VTD to the County roads. The traffic study concluded negligible impacts.

CC&V understands Woodland Park’s concern regarding additional trucks through downtown and in response to the three bullets stated in the City’s letter, we offer the following:
- CC&V will impress upon its shipping vendors during the vendor onboarding training program the importance of adhering to posted speed limits;
- We will request during vendor onboarding training that no Jake Brakes be used when entering the town; and
- We will suggest during vendor onboarding training that trucks use the left-hand lane, when feasible, while driving through town.

In response to the City’s other request regarding consideration of participation in ongoing traffic projects with the city of Woodland Park, CC&V is more than willing to engage with the City on ideas it has for reducing traffic stresses. We would like to better understand expectations and will contact you to set up an initial meeting.

We hope the information provided in response to your comments is helpful. Please do not hesitate to contact Clara Stewart at 719-689-4313 or myself at (719) 689-4055 or Meg.Burt@newmont.com if you have any questions regarding submittal.

Sincerely,

Meg Burt
Senior Environmental Manager
Cripple Creek & Victor Gold Mining Co
### Traffic Study Update - Delivery of Operations Supplies

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**Note:** Large truck = 16 or 18 wheeled tractor-trailer. Small truck = 4 to 15 wheeled trucks.
From: Sally Riley [mailto:Sriley@city.woodlandpark.org]
Sent: Thursday, August 03, 2017 11:25 AM
To: Williams, Dan [WilliamsD@co.teller.co]
Cc: ctiara.steward@newmont.com; mep bert@newmont.com
Subject: Response Comments to City of Woodland Park

Dear Mr. Williams:

The City of Woodland Park is in receipt of Newmont Mining Corporation's response comments via correspondence dated August 1, 2017. Furthermore, I enjoyed a brief conversation with Mr. Steward and Mr. Bert on August 1, 2017 regarding the proposed Amendment 11.

The city staff is satisfied that Newmont Mining Corporation has adequately addressed Woodland Park's truck traffic impacts and concerns. We appreciate Newmont's willingness to work with their contracted truck drivers during their “vendor onboarding training” sessions to obey the speed limits, prohibit the use of Jake Brakes and use the left-hand lanes (when feasible) while travelling through Woodland Park.

Thank you for the opportunity to provide input and for Newmont's consideration to help protect the safety and wellbeing of our pedestrians and travelling public.

Sally Riley, ACP  
Planning Director  
City of Woodland Park  
(719)687-5183
June 30, 2017

Mr. Dan Williams
Teller County Planner
Community Development Services Division
P.O. Box 1886
Woodland Park, Colorado 80866

RE: Agency Review Comments pertaining to Cripple Creek & Victor Gold Mining Company, Permit No. M-1990-244, Coreson Project Amendment 13, Mine Development Plan (MDP) Amendment

Dear Mr. Williams:

The City of Cripple Creek (City), Colorado, respectfully submits comments on permit Amendment 13 filed by the Cripple Creek & Victor Gold Mining Company (CC&V or mine) with the county.

In 1990, one hundred years after the history-making gold discovery in Poverty Gulch located just a few hundred yards of what later became the city limits of Cripple Creek, the voters of Colorado made it clear that they wanted to preserve and sustain the historic nature in and around the City by allowing limited states gambling in Cripple Creek. Since that time, the City has done its part in fulfilling the desires of the voters by preserving historic buildings and the historic nature of the City, while building an active, tourism-based community.

The taxes and fees paid by the gaming industry in Colorado help to support historic preservation throughout the state, add to the state's general fund, and provide support to community colleges. The City's tourist-based economy is primarily driven by the gaming industry and heritage tourism.

Part of what makes Cripple Creek unique to the other historic mining towns that exist outside of the Cripple Creek Mining District is that active mining continues still yet today. It is probably accurate to say that CC&V is one of a very few large mining operations in the United States that operates as close as it does to city and its residents.

Amendment 13 includes adding the hauling of gold ore concentrate recovered from the mine's High Grade Mill to an offsite location. It is planned that the ore concentrate will be hauled to Nevada using tractor-trailer trucks traveling on public roads and highways. The Amendment is requesting a 21% increase in large truck traffic on CO 67, with the total loads rising to 1.2% above what is currently allowed in Amendment 10.

The addition of substantially more large trucks, to what is already a very large number of trucks, on a two-lane, winding mountain road can have severe negative effects on traffic flow and public perception. It
becomes very worrisome when the small towns that are served by these roads rely on tourist who travel in light-duty vehicles and who may be dissuaded from traveling to our cities as truck traffic increases. It is with this concern that the City is requesting that the county and the mine more fully consider and investigate the effects of mine traffic on the cities of Cripple Creek and Victor before Amendment 11 is approved.

The City requests that as a condition of approval of Amendment 11, the mine commit to and undertake a comprehensive traffic study to include the effects of mine traffic on the economies of Cripple Creek and Victor. The study should include the feasibility of improving the stretch of CD 67 from mile marker 66 to mile marker 54. Improvements include items such as adding passing lanes, improving the line of sight, straightening curves, adding more passing zones, and improving the road shoulders. The feasibility study should also include investigating the formation of a partnership between the mine and the state to develop a funding mechanism for the CD 67 improvements.

There are several issues of concern that have led the City to request that the current traffic impact analyses be reconsidered. For instance:

- In the FUTURE CONDITIONS section of the May 2017 Revision of the December 2016 Amendment to the November 2015 Traffic Impact Analysis prepared by Interstate Engineering, the consultant asserts that actual traffic data collected over the last 30 years is basically invalid to use for future traffic projections because the growth rate in traffic flow is skewed to the high-side because of past mine development. The consultant, therefore, suggests that a modest growth rate that is 5-times less than the actual data be used for future traffic projections. The consultant provides no concrete evidence for using anything other than actual data.

- The traffic analyses also suggest that traffic volumes are in decline in the study area; however, information provided in the analyses suggests differently.

If viewed with an open mind by all parties, a business case may be made for undertaking the highway improvements. These improvements would not only benefit the economies of the local communities, but would also benefit the mine, its employees and its vendors.

The submission of comments by the City is not a statement of an objection to mining or to the operations of CC&V. The City acknowledges the economic importance of mining and its positive impacts. The City has been and remains supportive of the CC&V mining operations. The City also welcomes the opportunity to work with all parties involved to develop ideas and projects that will lead to the sustainability of the communities that have helped sustain a lucrative mining industry.

Respectfully,

-Ray Dubois
City Administrator
To: Dan Williams, Teller County Planner, and Meg Burt, Sr. Environmental Manager, Newmont

The City of Cripple Creek (City) finds that the responses provided below by Newmont Mining Company/Cripple Creek & Victor Gold Mining Company (CC&V) materially address the issues and requests made by the City in its comments to Teller County on June 30, 2017, related to Amendment 11. Further, the responses materially address the issues discussed in the meeting between the City and CC&V on July 27, 2017, and in subsequent emails.

For convenience, you will find attached the comments submitted by the City to the County on June 30, 2017.

Therefore, in consideration for the promises made below in the responses by CC&V, the City withdraws its implied objections to Amendment 11.

Regards,

Raymond G. (Ray) DuBois
City Administrator
City of Cripple Creek
P.O. Box 430
337 E. Bennett Avenue
Cripple Creek, Colorado 80813-0430
Office: 719-689-3316
Cell: 719-689-2489
Fax: 719-689-1288
Email: rdubois@cripple-creek.co.us
Comment #1
The City requests that as a condition of approval of Amendment 11, the mine commit to and undertake a comprehensive traffic study to include the effects of mine traffic on the economies of Cripple Creek & Victor. The study should include the feasibility of improving the stretch of CO 67 from mile marker 66 to mile marker 54. Improvement should include items such as adding passing lanes, improving the line of sight, straightening curves, adding more passing zones, and improving shoulders. The Feasibility study should also include investigating the formation of a partnership between the mine and the state to develop a funding mechanism for the CO 67 improvements.

CC&V Response:
As discussed in our meeting on July 27th and subsequent emails, CC&V commits to support a comprehensive traffic study and targeted traffic-related Social Impact Assessment (SIA) to evaluate the overall impacts of traffic on the economies of Victor and Cripple Creek. These studies will be completed in 2018, will be conducted during peak traffic months, and will assess potential improvements to Colorado State Highway 67 (SH 67). Because traffic on SH 67 is not solely attributable to CC&V, if these studies identify traffic-related impacts or potential improvements to SH 67, CC&V and its community partners will evaluate possible funding options to support this work. This evaluation will occur in early 2019. The traffic studies will be conducted after commencement of the activities proposed in CC&V’s Amendment 11 permit application to allow for a comprehensive review of overall traffic impacts. If these studies identify significant traffic-related impacts as a result of CC&V’s Concentrate Shipping Project, CC&V will initiate a dialogue with its community partners, including the City of Cripple Creek, to determine the best way to mitigate the impacts. At this time, CC&V does not commit to funding any improvements on SH 67.

Comment #2:
In the FUTURE CONDITIONS section of the May 2017 Revision of the December 2016 Amendment to the November 2015 Traffic Impact Analysis prepared by Interstate Engineering, the consultant asserts that actual traffic data collected over the last 10 years is basically invalid to use for future traffic projections because the growth rate in traffic flow is skewed to the high-side because of past mine development. The consultant, therefore, suggests that a modest growth rate that is 5-times less than the actual data be used for future traffic projections. The consultant provides no concrete evidence for using anything other than actual data.

CC&V Response:
The Traffic Impact Study (TIS) reviewed existing and historical traffic count data as well as projected future traffic data. Existing data was obtained in November 2016 by performing traffic counts at the intersections of SH67/CR821, SH67/Carlin Entrance and CR821/Iron Clad entrance. Historical traffic data from multiple locations around CC&V’s operations, including CR81, CR82 and CR821, was collected from Teller County. Historical and projected future traffic count data was collected from CDOT.

The new traffic study and SIA will provide additional data that should clear up any questions related to traffic volumes and trends.

Comment #3
The Traffic Analyses also suggest that traffic volumes are in decline in the study area; however, information provided in the analyses suggest differently.

CC&V Response:
The new traffic study and SIA will provide additional data that should clear up any questions related to traffic volumes and trends.
We appreciate the opportunity to work with the City of Cripple Creek and to provide these responses. If you find our responses satisfactorily address the City’s comments we respectfully request that you notify Teller County of such. Please do not hesitate to contact Clara Steward at 719-689-4313 or myself at (719) 689-4055 or Meg.Burt@newmont.com if you have any questions regarding submittal.

Thanks.

Meg

NEWMONT

Meg Burt
Senior Environmental Manager
Cripple Creek and Victor Gold Mining Co.
T 719.689.4055
M 775.397.3571
www.newmont.com

NEWMONT Mining Corporation
Cripple Creek and Victor Gold Mining Co
1100 North 9th Street
Victor, CO 80860

Please consider the environment before printing this e-mail

-------------------------------------------------------------
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-------------------------------------------------------------
The following are Victor’s comments on the CC&V Gold Mine’s request for Amendment 11 Application Permit No. M-1980-244-Mine Development Plan (MDP) Completeness and Sufficiency Review:

1. CCMOD: The City wishes to make certain that all City-owned and operated domestic water treatment plant, two water storage tanks, main lines, service lines and backwash pond remain outside the area of mine development as promised by the mine in earlier conversations. These facilities are located within the CCMOD but outside the Amendment 11 Boundaries on the eastern side of the intersection of CR 81 and 831. This costly infrastructure is the single source of clean drinking water to Victor and Goldfield and their continued operation is our utmost concern. We also wish to make certain that the mine Historical Buffer Zone remains in force.

2. Social and Economic Impacts: The change in ownership may have resulted in a negative impact to the local workforce. We believe that the use of an updated 2015 Social and Economic Impact letter leaves much to be desired. The City fields concerns regularly from citizens regarding the negative impact the loss of long-time local employees has had on our communities. It appears many of these employees are being replaced with Nevada or out-of-state employees that do not move to southern Teller County. New employees move to northern Teller County and this further impacts the traffic issues we already experience on Hwy 67. This trend needs to be evaluated closely. In addition, Arglo Gold Ashanti used several large sub-contractors that stayed in rental properties and campgrounds and were a major source of revenue to our local businesses. Sub-contracting companies have virtually disappeared.

3. Elevation Changes: We wish to be certain any changes to the elevation of any portion of the site does not interfere with emergency telecommunications and all other broadband lines of site between towers. The mine has provided a specific response to the City during this process assuring us the line of site from Amalgre Peak to Squaw Mountain will not be blocked. We just want to make sure this issue is documented. We are concerned as this specific issue was not addressed by the State during earlier amendments and the City and Mine had to quickly build a new tower after the waste pile behind Squaw Mt increased in elevation, blocking line of site to Tenderfoot.

4. Employees and Earnings: Please clarify which municipalities are recipients of sales tax revenues from the mine’s activities in the amount of $233,000 in 2016. We appreciate all the mine has done in the past in community re-investment, but much of the $700,000 awarded to locals in 2016 was approved by Anglo Gold Ashanti prior to the transfer in ownership. Several concerned agencies have shared with the Council that much of the former funding has disappeared in 2017. We ask for Newmont’s continued financial and personnel support to southern Teller County cities, non-profits and events by offsetting the impacts to Cripple Creek and Victor who receive little to no tax revenues to mitigate the current and future environmental and social impacts from the mine.
In no way do these questions and comments reflect opposition to the mine’s amendment. The City of Victor is supportive of the mine’s operations in our community and we wish to continue our long partnership with Cripple Creek & Victor Gold Mine.

Thank you,

Debra Downs
City Administrator
City of Victor
500 Victor Ave
P.O. Box 86
Victor, CO 80860
719-689-5641 (phone)
719-689-2703 (fax)
ddowns@cityofvictor.com
Website: www.cityofvictor.com

VICTOR
COLORADO
August 2, 2017

SENT VIA EMAIL

Ms. Deborah Downs
City Administrator
City of Victor
500 Victor Ave
P.O. Box 86
Victor, Colorado 80860

RE: Responses to the City of Victor’s Review Letter to Amendment 11 to Cripple Creek & Victor Gold Mining (CC&V) Permit No. M-1980-244-Mine Development Plan (MDP)

Dear Ms. Downs:

Cripple Creek & Victor Gold Mining Company (CC&V) is in receipt of your letter to Mr. Dan Williams of the Teller County Community Development Office regarding the City of Victor’s comments on the above referenced matter. We offer the following responses.

Victor Comment #1
CCMOD: The City wishes to make certain that all City-owned and operated domestic water treatment plant, two water storage tanks, main lines, service lines and backwash pond remain outside the area of mine development as promised by the mine in earlier conversations. These facilities located within the CCMOD boundary but outside the Amendment 11 boundaries on the easterly side of the intersection of CR 81 and 831. This costly infrastructure is the single source of clean drinking water to Victor and Goldfield and their continued operation is our utmost concern. We also wish to make certain that the mine Historical Buffer Zone remains in force.

CC&V Response:
CC&V acknowledges the importance of the emergency and water treatment and supply infrastructure for the City of Victor, and agrees that should mining activities conducted by CC&V impact the infrastructure, CC&V will assume full responsibility to resolve any issues that may arise.

There is no proposed change to the historic buffer areas around the City of Victor, Cripple Creek, or Goldfield.
Victor Comment #2:
Social and Economic Impacts: The change in ownership may have resulted in a negative impact to the local workforce. We believe that the use of an updated 2015 Social and Economic Impact letter leaves much to be desired. The City fields concerns regularly from citizens regarding the negative impact the loss of long-time local employees has had on our communities. It appears many of these employees are being replaced with Nevada or out-of-state employees that do not move to Southern Teller County. New employees move to Northern Teller County and this further impacts the traffic issues we already experience on Hwy 67. This trend needs to be evaluated closely. In addition, AngloGold Ashanti used several large sub-contractors that stayed in rental properties and campgrounds and were a major source of revenue to our local businesses. Sub-contracting companies have virtually disappeared.

CC&V Response:
CC&V did perform an update to the Social and Economic Impact Effects in 2017 in advance of submitting the MDP application. A summary of that analysis was provided in the letter the City references in its comments. With regards to sub-contractors, the sub-contractors employed by AngloGold Ashanti were retained to construct the high-grade mill, the new VLF and new ADR. That construction has been completed so the need for sub-contractors no longer exists.

Victor Comment #3
Elevation Changes: We wish to be certain any changes to the elevation of any portion of the site do not interfere with emergency telecommunications and all other broadband lines of site between towers.

CC&V Response:
In an email dated June 2, 2017 from Lisa Becker, External Relations Manager, to Deb Downs with the City of Victor, CC&V demonstrated that the broadband line of site between emergency telecommunications towers would not be obstructed by elevation changes permitted with Amendment 11.

Victor Comment #4
Employees & Earnings: Please clarify which municipalities are recipients of sales tax revenues from the mine’s activities in the amount of $233,000 in 2016. We appreciate all the mine has done in the past in community re-investment, but much of the $700,000 awarded to locals in 2016 was approved by AngloGold Ashanti prior to transfer in ownership. Several concerned agencies have shared with the Council that much of the former funding has disappeared in 2017. We ask for Newman’s continued financial and personnel support to southern Teller County cities, non-profits and events by offsetting the impacts to Cripple Creek & Victor who receive little to no tax revenue to mitigate the current and future environmental and social impacts from the mine.

CC&V Response:
Due to the location of the mine site within Teller County, CC&V pays all taxes required of the goods and services rendered by the mine site to the Colorado Department of Revenue.

Please note that Sales and Use tax is one of many taxes that CC&V pays in the State of Colorado.
Additional taxes that Newman pays include Colorado corporate income tax and property tax, as well Colorado mining specific taxes, such as Severance and Producing Mines taxes. Property taxes and Producing Mines tax stay right in the local community. Severance taxes are divided evenly between the Department of Natural Resources ("DNR") and the Department of Local Affairs ("DOLA"). Each department uses funding from severance taxes differently. DNR uses the funding for water projects, for natural resources-related programs and for low-income energy assistance. DOLA distributes its funding to local governments to offset the impact of natural resource extraction.

CC&V continues to support local community organizations at similar donation levels as previous years. All donations are reviewed by a committee and assessed based on community need and impact.

We appreciate the opportunity to work with the City of Victor and to provide these responses. If you find our responses satisfactorily address the City’s comments we respectfully request that you notify Teller County of such. Please do not hesitate to contact Clara Steward at 719.689.4313 or myself at 719.689.4055 or Meg.Burt@newmont.com if you have any questions regarding submittal.

Sincerely,

Meg Burt
Senior Environmental Manager
Cripple Creek & Victor Gold Mining Co
Dan,
The City has received this letter from CC&V Gold Mine in response to our comments. We are satisfied with their answers.

Thank you,

Debra Downs
City Administrator
City of Victor
500 Victor Ave
P.O. Box 86
Victor, CO 80860
719-689-5641 (phone)
719-689-2703 (fax)
ddowns@cityofvictor.com
Website: www.cityofvictor.com
July 7, 2017

Teller County – Community Development Services
Attn: Lynda Morgan

Re: Cripple Creek & Victor Gold Mining Company
Cresson Project Amendment 11 Submittal

The following memo provides review comments for the proposed CC&V Amendment 11, for the specific areas listed below:

Hydrologic Evaluation

As stated in the 2015 CC&V report, activities in most of the Amendment 11 area are not expected to impact surface or ground water conditions due to historic drainage/dewatering tunnels. Minimal impact to Grassy Valley is expected, as a result of increasing the final crest elevation of ECOSA. Existing monitoring appears to be in conformance with Teller County CCMOD criteria.

Baseline Technical Report for Soils and Biological Resources

The 2015 Arcadis report outlines all applicable data for soils and biological resources in the area affected by Amendment 11. Reclamation observations are consistent with the Teller County CCMOD criteria.

Updates to Stormwater Design Reports

The 2014 design report, 2015 design report update, agency review comments and responses, and the 2017 memorandum have been reviewed, and are determined to be in general conformance with Teller County criteria. Amendment 11 activities are not anticipated to adversely affect any downstream properties.

The following comments however, should be addressed for the Chicago Tunnel area:

a. Please clarify whether the Chicago Tunnel detention pond has been constructed, or is still in the design stage. The 2015 design report update (page 6) states that it has been constructed to the design dimensions.

b. Please clarify the size of the detention pond. The original design reports and SEDCAD data both state it has been sized for the 10-year/24 hour storm (0.46 ac-ft), with potential upsizing to accommodate twice the 10-year/24 hour storm (0.97 ac-ft). The 2017 memorandum goes on to state the required volume is (2 x 0.21 ac-ft = 0.42 ac-ft), which coincides with the revised SEDCAD data that was adjusted as a result of the agency review. Is it just coincidental that the original pond design happens to be the correct size after the time of concentration adjustments?

c. Reference drawing CCVSA11-6 (5) - If the intent of the alternate upsizing of the Poverty Gulch culvert statement is correct, and all upstream flow (including Poverty Gulch Stream) will be directed to the detention pond, then the pond sizing, outfall and SEDCAD upstream routing will need to be reviewed and amended accordingly.
Geotechnical & Engineering Geology

The following comments were received from CTL Thompson, consulted for review of the Geotechnical and Engineering Geology components of the project.

a. We reviewed the Hydrogeochemistry Evaluation prepared by Adrian Brown dated December 15, 2015 (Project No. 1385). The work was comprehensive in our opinion and complete.

b. The review of blasting studies prepared by Matheson Mining Consultants, Inc. dated November 3, 2015 involved the review of historical studies conducted by numerous parties and appeared to be reasonable. We also reviewed recommendations for the installation of ground motion detection devices and seismographs near structures off the property and we believe those recommendations are appropriate.

c. The Geotechnical Slope Recommendations for the North Area Underground Mining Areas prepared by Call & Nicholas, Inc. dated November 2015 was complete and we believe the recommendations are reasonable for the application.

d. NewFields prepared a Technical memorandum dated 30 November 2016 (Project No. 475.0108.05) for the evaluation of slope stability of the East Cresson Overburden Storage area. The report was in our opinion complete and the recommendations appear to be reasonable.

If you have any questions related to these comments, or if we can be of further assistance in discussing our comments or requests, please feel free to contact us.

Respectfully,
Drexel, Barrell & Co.

Tim McConnell, P.E.
Senior Associate, Regional Manager
July 31, 2017

Mr. Tim McConnell
Senior Associate, Regional Manager
Drexel, Barrell & Co.
3 South 7th Street
Colorado Springs, Colorado 80905

Ref: Responses to DBC Review Comments Dated July 7, 2017 for
Cripple Creek & Victor Gold Mining Company
Cresson Project Amendment 11 Submittal

Dear Mr. McConnell:

Cripple Creek & Victor Gold Mining Company (CC&V) received a copy of your comments to
the proposed CC&V Amendment 11 application. There were several comments related to
updates to stormwater design reports and the following letter serves to provide clarification to
those comments. Below you will find a restatement of your comment followed by our response.

Updates to Stormwater Design Reports
The 2014 design report, 2015 design report update, agency review comments and responses, and the 2017 memorandum have been reviewed, and are determined to be in general
conformance with Teller County criteria. Amendment 11 activities are not anticipated to adversely affect any downstream properties.

The following comments however, should be addressed for the Chicago Tunnel area:

- Please clarify whether the Chicago Tunnel detention pond has been constructed, or is
  still in the design stage. The 2015 design report update (page 6) states that it has been
  constructed to the design dimensions.

  RESPONSE: The Chicago Tunnel detention pond was constructed in August of 2014
  and is currently being used to control storm water in the area.

- Please clarify the size of the detention pond. The original design reports and
  SEDCAD data both state it has been sized for the 10-year/24 hour storm (0.46 ac-ft),
  with potential upsizing to accommodate twice the 10-year/24 hour storm (0.97 ac-ft).
  The 2017 memorandum goes on to state the required volume is (2 x 0.21 ac-ft = 0.42
  ac-ft), which coincides with the revised SEDCAD data that was adjusted as a result of
  the agency review. Is it just coincidental that the original pond design happens to be
  the correct size after the time of concentration adjustments?
RESPONSE: The final design volume of the detention pond is 0.45 ac-ft, which will sufficiently contain twice the 10-yr 24-hr storm event (2 x 0.21 ac-ft = 0.42 ac-ft). Based on the revised SEDCAD data, which was completed in response to adequacy review comments received by the Division of Reclamation Mining and Safety (DRMS), the pond did not need to be resized as the final designed volume of 0.45 ac-ft was greater than twice the design storm event volume.

• Reference drawing CCVSA11-6 (3) - If the intent of the alternate upsizing of the Poverty Gulch culvert statement is correct, and all upstream flow (including Poverty Gulch Stream) will be directed to the detention pond, then the pond sizing, outfall and SEDCAD upstream routing will need to be reviewed and amended accordingly.

RESPONSE: It is important to note that the stormwater coming from upper Poverty Gulch is not impacted by CC&V's mining activities and is simply conveyed down the natural stream channel. The proposed design on Drawing CCVSA11-6(3) was to upgrade the existing 18" culvert to a 24" pipe and provide a 6 ft. wide armored spillway and swale to convey excess water back to the Poverty Gulch stream channel and to protect the access roadway. A 10x30x24" deep sediment trap was included in the design to slow the flow of the bypass to trap sediment resulting from limited periods of high flow. This alternative will handle the 100-year event.

Drawing CCVSA11-06(3) also shows an alternative design for the culvert, which includes upgrading the culvert to a 30" pipe. This would eliminate the need for the armored spillway, swale and sediment trap required for the 24" culvert as all flow would be conveyed to Sediment Pond. Included with the alternative design is an 8’ wide armored spillway at the one-foot freeboard depth cut into the stream side of the crest of the Sediment Pond, which would be constructed to ensure the Sediment Pond is designed to manage the 100-year event.

Closing

We appreciate the opportunity to provide this information to you and Teller County. If our responses satisfactorily address your comments we respectfully request that you notify Ms. Lynda Morgan of Teller County Community Development Services in writing informing the County of your receipt of these responses and notifying them that you have no further question or comments.

As always, please do not hesitate to contact us if you have additional comments or questions.

Sincerely,

Meg Burt
Senior Environmental Manager

Cc: Lynda Morgan, Teller County
I am writing to let you know that we have no remaining comments regarding our CC&V Amendment 11 review.

This is in light of having a phone conversation with Clara and Poppy yesterday and having reviewed the response to comment letter provided Newmont this morning.

Please let me know if you have any additional questions or us.

Thank you,
July 7, 2017

Dan Williams
Teller County Planning
PO Box 1886
Woodland Park, CO 80866

RE: CC & V Amendment 11

Dear Dan:

The Colorado Department of Transportation has reviewed the information submitted with the referral request for comment on the proposed Cripple Creek & Victor Mine Amendment 11. We have the following comments:

- The traffic impact analysis dated 2015 and all subsequent letters and revisions have been reviewed by the CDOT Traffic Operations Unit. Their comments follow:
  1. CDOT was never given the opportunity to review and comment on the Traffic Impact Analysis for the Cripple Creek & Victor Gold Mining Company Cresson Project - Amendment 11, dated November 2015, which proposed expanding the mine and adding 94 employees.
  2. The TIA Amendment, dated May 2017, does not address whether any or all of the additional 94 employees have yet been hired. If the additional employees have not yet been hired, the traffic they will generate should be added to the analysis. Therefore, additional information or revised TIS is required.
  3. CDOT's primary concern is with the adequacy of the length of the left-turn deceleration lane on SH 67 approaching the intersection with CR B21. The TIA needs to address the adequacy of the left-turn lane in relation to the requirements in the Colorado State Highway Access Code (SIAC). Passenger-car equivalents (PCEs) must be used for proposed site-generated truck traffic, as explained in the SIAC. If the latest traffic counts conducted at the intersection did not include vehicle classification, either new counts must be conducted that include vehicle classification or a reasonable assumption of the existing truck percentage must be made.
  4. An access permit application must be submitted for the SH 67/CR B21 intersection because of the projected increase in traffic using the access to/from the state highway.

- The drainage report dated April 3, 2017 has been reviewed by the CDOT hydraulic unit. They have no comment. However, drainage to the state highway right of way shall not exceed the undeveloped historic rates. All rates in excess of historic shall be detained on site and released at historic levels.
- All discharges to the CDOT highway drainage system shall comply with the applicable provisions of the Colorado Water Quality Control Act and the Colorado Discharge Permit Regulations, and are subject to inspection by the CDOT and CDPHE.
- All discharges to the CDOT highway drainage system must comply with the applicable provisions of the Colorado Water Quality Control Act and the Colorado Discharge Permit Regulations, and are subject to inspection by the CDOT and CDPHE. CDOT would like to emphasize that this development devise and
implement a permanent plan for periodic removal and disposal of sediment from detention facilities and for maintenance of development detention facilities.

- Where detention facilities are required the CDOT MS4 permit requires the applicant to devise and implement a permanent plan for periodic removal and disposal of sediment from detention facilities and for maintenance of development detention facilities. A maintenance plan shall be included in the drainage report. The plan shall indicate the responsible party, the timetable for removal, the method of removal, and the method of sediment disposal.
- Information regarding design, environmental provisions, MS4 permit provisions and/or mitigation techniques can be found at the following CDOT websites:
  - http://www.dot.state.co.us/DesignSupport/
  - http://www.dot.state.co.us/environmentalNewsletter.asp
- The Noise Study dated November 2, 2015 and addendum dated January 31, 2016 has been reviewed by the CDOT Environmental Manager. We reserve comment until the revised TIS has been reviewed and it is determined whether highway improvements are required.
- On-premise and off-premise signage shall comply with the current Colorado Outdoor Advertising Act, sections 42-1-401 to 421, C.R.S., and all rules and regulations pertaining to outdoor advertising. Please contact Mr. Mark Nusslern at (719) 546-9433 for any questions regarding advertising devices.
- Any utility work within the state highway right of way will require a utility permit from the CDOT. Information for obtaining a utility permit can also be obtained by contacting Mr. Nusslern.

If you have any questions, please contact me in Pueblo at (719) 546-5407.

Sincerely,

Valerie Sword
Permits Manager

Xc:  Andrew
     Davis
     Johnson
     Luxberg
     Frei
     Cress
     Nusslern
     Lewis/Fle
August 3, 2017

SENT VIA EMAIL

Ms. Valerie Sword
Permits Manager Colorado Department of Transportation
Traffic & Safety – Permits
P.O. Box 536
Pueblo, CO 81002

RR: Responses to CDOT Agency Review Letter to Amendment 11 to Cripple Creek & Victor Gold Mining (CC&V) Permit No. M-1980-244–Mine Development Plan (MDP)

Dear Ms. Sword:

Cripple Creek & Victor Gold Mining Company (CC&V) is in receipt of your July 7, 2017 letter to Mr. Dan Williams of the Teller County Community Development Office regarding the Colorado Department of Transportation (CDOT) comments on the above referenced matter. Based on our meeting on July 26, 2017 we offer the following responses.

CDOT Comment #1
CDOT was never given the opportunity to review and comment on the Traffic Impact Analysis for the Cripple Creek & Victor Gold Mining Company Cresson Project – Amendment 11, dated November 2015, which proposed expanding the mine and adding 94 employees.

The TIA Amendment, dated May 2017, does not address whether any or all of the additional 94 employees have yet been hired. If the additional employees have not yet been hired, the traffic they will generate should be added to the analysis. Therefore, additional information or revised TIS is required.

CC&V Response:
A copy of the November 2015 TIA was included with the MDP application along with the update to ensure review agencies had access to the information.

The 94 employees identified in the November 2015 TIA were not hired nor are there plans to hire these individuals at this time. Therefore, the updated TIA included accurate employee counts.

CDOT Comment #2:
CDOT’s primary concern is with the adequacy of the length of the left-turn deceleration lane on SH 67 approaching the intersection with CR 821. The TIA needs to address the adequacy of the left-turn lane in...
relation to the requirements in the Colorado State Highway Code (SHAC). Passenger-car equivalents (PCEs) must be used for proposed site-generated truck traffic, as explained in the SHAC. If the latest traffic counts conducted at the intersection did not include vehicle classification, either new counts must be conducted that include vehicle classification or a reasonable assumption of the existing truck percentages must be made.

CC&V Response:
Although the TIA did not specifically refer to PCEs, the actual traffic count data contained vehicle classification information. The table below shows the vehicle count and PCE data from November 2016 together with the 20-year projections:

<table>
<thead>
<tr>
<th>Classification</th>
<th>Actual Count Nov-2016</th>
<th>PCE</th>
<th>2037 Projection</th>
<th>PCE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Large Trucks</td>
<td>1</td>
<td>3</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>Medium Trucks</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Light Vehicles</td>
<td>12</td>
<td>12</td>
<td>18</td>
<td>18</td>
</tr>
<tr>
<td>Total</td>
<td>13</td>
<td>15</td>
<td>20</td>
<td>24</td>
</tr>
</tbody>
</table>

Based on CDOT criteria, SH67 is categorized as a Rural Highway (R-B). The minimum left-turn deceleration length as required by the SHAC was determined to be 395 feet in length. The actual left-turn deceleration length is 542 feet in length. Refer to the table below:

<table>
<thead>
<tr>
<th>Road Width</th>
<th>12 ft</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grade</td>
<td>2.2%</td>
</tr>
<tr>
<td>Posted Speed</td>
<td>40 mph</td>
</tr>
<tr>
<td>Deceleration Length</td>
<td>370 ft (includes taper length)</td>
</tr>
<tr>
<td>Transition Taper Ratio (12:1)</td>
<td>144 ft (included in Deceleration Length)</td>
</tr>
<tr>
<td>Redirect Taper (30:1)</td>
<td>360 ft (included in Deceleration Length)</td>
</tr>
<tr>
<td>Storage Length</td>
<td>25 ft</td>
</tr>
<tr>
<td>Deceleration Length + Storage Length</td>
<td>395 ft</td>
</tr>
<tr>
<td>Total Deceleration Lane Length Required</td>
<td>395 ft</td>
</tr>
<tr>
<td>Actual Deceleration Lane Length</td>
<td>542 ft</td>
</tr>
</tbody>
</table>

Based on SHAC requirements, the existing intersection configuration and existing traffic data, CC&V believes that the intersection and the left-turn deceleration length is adequate.

CDOT Comment #3
An access permit application must be submitted for the SH 67/CR 821 intersection because of the projected increase in traffic using the access to/from the state highway.
CC&V Response:
Based on the assessment above, CC&V does not believe that an access permit will be required at this time.

CDOT Comment # 4
The drainage report dated April 3, 2017 has been reviewed by the CDOT Hydraulic Unit. They have no comment. However, drainage to the state highway right of way shall not exceed the undeveloped historic rates. All rates in excess of historic shall be detained on site and released at historic levels.

CC&V Response:
Comment noted.

CDOT Comment #5
All discharges to the CDOT highway drainage system shall comply with the applicable provisions of the Colorado Water Quality Control Act and the Colorado Discharge Permit Regulations, and are subject to inspection by CDOT and CDPHE.

CC&V Response:
Comment noted. CC&V maintains an active stormwater discharge permit with the Colorado Department of Public Health and Environment pursuant to the Colorado Discharge Permit System regulations.

CDOT Comment #6
All discharges to the CDOT highway drainage system shall comply with the applicable provisions of the Colorado Water Quality Control Act and the Colorado Discharge Permit Regulations, and are subject to inspection by CDOT and CDPHE. CDOT would like to emphasize that this development devise and implement a permanent plan for periodic removal of sediment from detention facilities and for maintenance of development detention facilities.

CC&V Response:
Comment noted. CC&V maintains an active stormwater discharge permit with the Colorado Department of Public Health and Environment pursuant to the Colorado Discharge Permit System regulations. A requirement of this permit is to maintain a site-wide Stormwater Management Plan, which includes Best Management Practices (BMP’s) to manage stormwater as well as maintenance of BMP’s, roadways and ditches.

CDOT Comment #7
Where detention facilities are required the CDOT MS4 permit requires the applicant to devise and implement a permanent plan for periodic removal and disposal of sediment from detention facilities and for maintenance of development detention facilities. A maintenance plan shall be included in the drainage report. The plan shall indicate the responsible party, the timetable for removal, the method of removal, and the method of sediment disposal. The information regarding design, environmental provisions, MS4 permit provisions and/or mitigation techniques can be found at the following CDOT websites:

www.dot.state.co.us/designtools
www.dot.state.co.us/environmental/newsletters.asp
CC&V Response:
Comment noted. CC&V will work with CDOT to develop a plan for sediment removal of detention facilities.

CDOT Comment #8
The Noise Study dated November 2, 2015 and addendum dated January 31, 2016 has been reviewed by the CDPT Environmental Manager. We reserve comment until the revised TIS has been reviewed and it is determined whether highway improvements are required.

CC&V Response:
Comment noted. Based on responses above, improvements to the highway are not required.

CDOT Comment #9
On-premise and off-premise signs shall comply with the current Colorado Outdoor Advertising Act, sections 43-1-401 to 421, C.R.S., and all rules and regulations pertaining to outdoor advertising. Please contact Mr. Mark Nusskern at (719) 546-5433 for any questions regarding advertising devices.

CC&V Response:
Comment noted.

CDOT Comment #10
Any utility work within the state highway right of way will require a utility permit from CDOT. Information for obtaining a utility permit can also be obtained by contacting Mr. Nusskern.

CC&V Response:
Comment noted.

We appreciate the opportunity to work with CDOT and to provide these responses. If you find our responses satisfactorily address CDOT’s comments we respectfully request that you notify Teller County of such. Please do not hesitate to contact Clara Steward at 719-689-4313 or myself at (719) 689-4055 or Meg Burt@newmont.com if you have any questions regarding submittal.

Sincerely,

[Signature]

Meg Burt
Senior Environmental Manager
Cripple Creek & Victor Gold Mining Co
Hi Meg,

So sorry for the slow response. I've not been at my desk the past few days (meetings...) Regardless, your revised letter is acceptable to CDOT, with NO highway improvements or Access Permit. Formal comments will be provided as soon as I can make time.

In the interim, Dan, please accept this email as official CDOT correspondence.

Thanks,

Valerie Sword

Permit Manager
Traffic and Safety

P 719.546.5407  |  C 719.546.5403  |  F 719.562.5523

905 N Erie Avenue, PO Box 536, Pueblo, CO 81002
valerie.sword@state.co.us  |  http://www.codot.gov  |  www.cotrj.org
July 7, 2017

Dan Williams
Teller County Planning
PO Box 1886
Woodland Park, CO 80866

RE: CC & V Amendment 11 - Response Letter

Dear Dan:

The Colorado Department of Transportation has reviewed the information submitted with the referral request for comment on the proposed Cripple Creek & Victor Mine Amendment 11. The Region 2 Traffic Unit has reviewed the subject July 31, 2017 response letter from Meg Burt, Senior Environmental Manager, Newmont Mining Corporation and has the following comments;

- Based on the submittals and referenced comments regarding the Traffic Impact Analysis Amendment dated May 2017, CDOT will not require a State Highway Access Permit.

Our July 7, 2017 comments regarding the Colorado Outdoor Advertising, Utility and Special Use permitting remain valid.

If you have any questions, please contact me in Pueblo at (719) 562-5537.

Sincerely,

Andrew Lewis
Assistant Access Manager

Xc: Meg Burt, Senior Environmental Manager, Newmont Mining Corporation
MEMORANDUM

TO: CDSD - Planning
FROM: TCPW - TCDOT B.K.
DATE: June 27, 2017
RE: CC-V Amendment 11

After review of the submittal, I offer the following:

1. In order to meet roadway adequacy as contained in the LUR, CC-V has submitted a proposal committing to make and fund improvements to CR 821 from Highway 67 to CR 821 with regards to the adequacy criteria as contained in the Teller County Roadway design and Construction Standards (TCD&C). 

2. In order to meet roadway adequacy as contained in the LUR, CC-V has submitted a proposal committing to partner and collaborate with Teller County Public Works (TCPW) with regards to the long term management/maintenance solution for CR 82 from Highway 67 to CR 82.

As long as any approval is conditioned on the successful execution of a properly collateralized improvements Agreement (IA), TCPW has no concerns for this proposed use. The exact details of an IA have yet to be determined.

If you have any questions or concerns, please feel free to ask.
August 7, 2017

SENT VIA EMAIL

Teller County Public Works/
Department of Transportation
308-A Waterville Road
P.O. Box 305
Divide, Colorado 80814

RE: Responses to TCPW-TCDOT Agency Review Memorandum to Amendment 11 to
Cripple Creek & Victor Gold Mining (CC&V) Permit No. M-1980-244-Mine
Development Plan (MDP)

Greetings:

Cripple Creek & Victor Gold Mining Company (CC&V) is in receipt of your June 27, 2017 memorandum to Mr. Dan Williams of the Teller County Community Development Office regarding the TCPW-TCDOT comments on the above referenced matter. We offer the following responses to your comments.

**Comment #1**
In order to meet roadway adequacy as contained in the LUR, CC&V has submitted a proposal committing to make and fund improvements to CR 821 from Highway 67 to CR 821 with regards to the adequacy criteria as contained in the Teller County Roadway design and Construction Standards (TCDRCS).

*CC&V Response:*
*Comment noted.*

**Comment #2**
In order to meet roadway adequacy as contained in the LUR, CC&V has submitted a proposal committing to partner and collaborate with Teller County Public Works (TCPW) with regards to the long-term management/maintenance solution for CR 82 from Highway 67 to CR 821. As long as any approval is conditioned on the successful execution of a properly collateralized Improvement Agreement (IA), TCPW has no concerns. The exact details of an IA have yet to be determined.
CC&V Response:
Comment noted. CC&V will work with TCPW to develop an Improvement Agreement.

We appreciate the opportunity to work with TCDOT and to provide these responses. If you find our responses satisfactorily address TCDOT's comments we respectfully request that you notify Teller County of such. Please do not hesitate to contact Clara Steward at 719-689-4313 or myself at (719) 689-4055 or Meg.Burt@newmont.com if you have any questions regarding submittal.

Sincerely,

[Signature]

Meg Burt
Senior Environmental Manager
Cripple Creek & Victor Gold Mining Co
From: Erickson - DNR, Wally [mailto:wally.erickson@state.co.us]
Sent: Tuesday, June 27, 2017 9:10 AM
To: Krochta, Camille <KrochtaC@co.teller.co.us>
Cc: Tim Cazier <tim.cazier@state.co.us>; Williams, Dan <WilliamsD@co.teller.co.us>
Subject: Re: Referral Comments for CC&V Amendment 11

Thank you for this opportunity to comment on the Teller County permitting process. The Division has worked with Teller County on the Amendment 11 approval process conducted at the State level and has no additional comments at this time. If the plan approved by Teller County diverges significantly from the plan previously approved at the State level, the Operator can revise the State plan as necessary.

Wally Erickson

---
Wally Erickson
Senior Environmental Protection Specialist

P 303.866.3567 ext. 8176 | F 303.832.8106
1313 Sherman Street, Room 215, Denver, Colorado 80203
wally.erickson@state.co.us | http://mining.state.co.us
May 1, 2017

Lynda Morgan
Teller County Community Development Services
P.O. Box 1886
Woodland Park, CO 80866

Re: Cresson Project, Permit No. M-1980-244;
Amendment 11 (AM-11) Teller County CCMOD

Dear Ms. Morgan:

The Division of Reclamation, Mining and Safety (Division) is formally providing notice to Teller County that CC&V has submitted all necessary documentation pursuant to and satisfactory to the Division for Amendment 11.

If you have any questions, you may contact me at (303)866-8567 x8169.

Sincerely,

[Signature]
Timothy A. Cazier, P.E.
Environmental Protection Specialist

cc: Dan Williams, Teller County
DRMS file
From: Tittarington, Amy J -FS [mailto:amyjltitterington@fs.fed.us]
Sent: Friday, June 09, 2017 8:01 AM
To: Williams, Dan <WilliamsD@co.teller.co.us>
Cc: Voorhis, Josh -FS <voorhis@fs.fed.us>; Davila, Anthony - FS, Lake George, CO <anthonydavila@fs.fed.us>
Subject: RE: Victor Gold Mine Package

Dan,

Thank you for the opportunity to comment. At this time, I have no comments on the Victor Gold Mine, as it does not affect NFS lands.

Regards,

Amy

Amy Tittarington, P.G., CMA I
Geologist
USDA Forest Service
Pikes Peak National Forests, South Park Ranger District
p: 719-836-3874
h: 719-836-3875
amyltitterington@fs.fed.us
320 Highway 245/PO Box 219
Guffey, CO 80830
www.fs.fed.us

Caring for the land and serving people
06/27/2017

Dan Williams
Planner

RE: Z17-0005
SRU-AMENDMENT
Amendment II

Dan,
The Building Department doesn’t have any issues with the SRU-Amendment, with the following conditions:

- All applicable building permits will be required for any new building, or alterations to any existing buildings.
- All applicable Environmental Health permits will be required for any new septic systems or vaults

Let me know if you have any questions.

Regards,

Terry Brunette
Building Official
719-686-5408
Good morning Camille;

Caleb Foy is on vacation. I have taken a look at the plan, and we do not have any objections as long as the mine boundary does not exceed that boundary description decreed in combined Case Nos. 02CW122 and 10CW31 in the Division 2 Water Court. If the mine boundary exceeds that defined as the Cresson Project in that combined case, the augmentation plan will need to be revised, which may also require a Substitute Water Supply Plan until the amendment to the decree is made.

If you have further questions, you may contact me directly at the number given below.

Sincerely,

Melissa A. Peterson, P.E.
Water Resources Engineer
Team 237 Leader

P 303.866.3181 x 8268
1313 Sherman St., Suite 619, Denver, CO 80203
Melissa.A.Peterson@state.co.us | www.water.state.co.us
August 9, 2017

Dan Williams
County Planner
Teller County Planning Department
PO Box 1886
Woodland Park, 80863

RE: Response to Teller County Planning Department after Conversations with Cripple Creek and Victor (CC&V) Gold Mine re: Amendment 11 Permit number 1980-244-Mine Development Plan (MDP)

Dear Mr. Williams,

CPW is familiar with the project, and has recently talked with the mine, and has no additional recommendations other than those outlined in our previous letter from June 17, 2017. That letter is attached for your reference.

Thank you for the opportunity to comment on Amendment 11 Permit number 1980-244-Mine Development Plan (MDP). If you have any questions or require additional information please contact District Wildlife Manager Tim Kroening at 719-227-5281 or via e-mail Tim.Kroening@state.co.us.

Sincerely,

Frank McGee
Area Wildlife Manager

Cc: Tim Kroening DWM
   SE Regional File
   Area 14 File
June 17, 2017

Dan Williams
County Planner
Teller County Planning Department
PO Box 1886
Woodland Park, 80863

RE: Cripple Creek and Victor Gold, Amendment 11

Dear Mr. Williams,

Colorado Parks and Wildlife (CPW) is in receipt of the above referenced permit application and is familiar with the site located at or near Section 20, Township 15S, Range 69W, 6th Principal Meridian in Teller County. CPW staff offers the following comments for your consideration.

The mission of CPW is to perpetuate the wildlife resource of the state, to provide a quality state park system, and to provide enjoyable and sustainable outdoor recreation opportunities that educate and inspire current and future generations to serve as active stewards of Colorado's natural resources. Our goal in responding to land use proposals such as this is to provide complete, consistent, and timely information to all entities who request comments on matters within out statutory authority.

Colorado Parks and Wildlife recommends a 250 meter buffer around Townsend's big-eared bat roost sites. The Townsend's big-eared bat is a state species of concern, and is susceptible to disturbance. The bat is known to occur near mining areas, specifically near the Cripple Creek and Victor Gold Mine.

Loud noises and light can affect wildlife especially during the night. CPW recommends that efforts are made to minimize noise and light levels during these hours.

CPW suggests care be taken during mining to avoid excess erosion or disturbance of more land than necessary to accomplish the project. We also suggest the area be reasonably reclaimed following mining. We recommend reusing the original top soil that is removed from the surface by placing it back in its original location after mining is completed. Once the original top soil is in place, we recommend planting the disturbed areas with native vegetation that matches the native vegetation already present in the surrounding area.
CPW recommends the development and implementation of a noxious weed control plan for the site. We recommend all disturbed soils be monitored for noxious weeds and noxious weeds be actively controlled until native plant revegetation and reclamation is achieved.

As mentioned in a previous letter to the Division of Reclamation Mining and Safety (DRMS) Colorado Parks and Wildlife recommends preventative measures to minimize harmful impacts to wildlife throughout the site. One preventative measure is an eight foot tall woven wire wildlife fence be installed where there is a potential for wildlife to fall into a high wall pit or come into contact with harmful chemicals. The fence could be installed around the perimeter of the site instead of around each individual hazard, with the exception of areas of potential hazardous chemical exposure that may require additional protections as discussed below. CPW also recommends that the fence have one way wildlife escape structures where appropriate to prevent wildlife from getting trapped in between a fence and a hazard.

CPW also recommends that when mining operations result in exposed chemicals that are potentially harmful and could be accessed by any wildlife, those pits/ponds should be constructed with additional protection for wildlife. Where necessary to protect public health, safety and welfare, or to prevent significant adverse environmental impacts resulting from access to a hazard by wildlife and migratory birds, operators should install appropriate exclusion netting or bird balls and wildlife exclusion fencing. This should include installing netting or bird balls at any open storage tanks where birds or bats can access hazardous chemicals.

Additionally, CPW recommends that roads leading into areas containing harmful chemicals have a gate or two cattle guards back to back to prevent wildlife from entering. Two cattle guards are necessary to prevent wildlife from entering as they can generally jump across one cattle guard.

Thank you for the opportunity to comment on the Cresson Project. If you have any questions or require additional information please contact District Wildlife Manager Tim Kroening at 719-227-5281 or via e-mail Tim.Kroening@state.co.us.

Sincerely,

[Signature]

Frank McGee
Area Wildlife Manager

Cc: Tim Kroening DWM
SE Regional File
Area 14 File
From: Worth, James

Sent: Tuesday, June 27, 2017 6:03 PM

To: Krochta, Camille

Cc: Grammon, Larry; Opp, Kevin

Subject: RE: Referral Comments for CC&V Amendment 11

Camille,

After reviewing Attachment 11, it appears the noise levels in the study will not have an adverse impact on Black Hills Energy electric operations.

James Worth
Energy Services Manager
Ph. 729-546-5869
APPENDIX C:
Amendment 11 View shed
View shed from Bennet Avenue
View shed from Heritage Visitor Center
View shed from Phantom Canyon Road
View shed from Mt. Pisgah Cemetery
Current View (July 2015) From Bennett Avenue

Simulated View From Bennett Avenue - Maximum Disturbance

Simulated View From Bennett Avenue - After Reclamation
APPENDIX D: CR 82 and 821 Improvements Commitment Letter
August 23, 2017
August 23, 2017

SENT CERTIFIED RETURN RECEIPT REQUESTED  
706-3010-0000-0465-5983  
Via Email to Dan Williams and Bryan Kincaid

Mr. Dan Williams  
Teller County Planner  
Community Development Services Division  
P.O. Box 1886  
Woodland Park, CO 80866

RE: Amendment 11 Conditional Approval – CR 82 and 821 Improvements

Dear Mr. Williams:

Under the Teller County Review of Amendment 11, the Teller County Public Works-Teller County Department of Transportation (TCDOT) was consulted as part of the Formal Referral Agency review. Per TCDOT’s comments submitted to Teller County on June 27, 2017, Newmont’s Cripple Creek & Victor Gold Mine (CC&V) has entered into discussions with TCDOT in order to seek its request for an Improvement Agreement (IA) on County Roads (CR) 82 and 821.

Per discussions at a meeting on August 16, 2017 with TCDOT, CC&V does hereby agree to reconstruct a portion of CR 82 and provide maintenance reimbursement on CR 82 per the following:

1. CC&V commits to conducting the work addressed in the attached HDR Report for Area 1 CR 821 Independent Evaluation of Pavement Design during the 2018 construction season;
2. CC&V proposes to enter into a reimbursement agreement with TCDOT on CR 82. CC&V agrees to a reimbursement plan not to exceed $15,000 per year through the estimated life of mine, currently 2025;
3. By the next scheduled Board of County Commissioner’s meeting, CC&V shall post a financial surety bond in the amount of $1,785,975 equaling the estimate defined in the HDR report plus a 25% contingency;
4. As requested, the Concentrate Schedule at this time is as follows:
   a. Rougher concentrate shipping project completion is December with a plan to ship the first rougher concentrates at approximately 5 trucks per day commencing on December 27, 2017;
   b. Cleaner concentrate project completion is May 2018 with a plan to ship cleaner concentrate at approximately 13 trucks per day commencing on June 15, 2018.
Please do not hesitate to contact Meg Durt at 719-689-4055 or Meg.Durt@newmont.com if you have any questions regarding submittal.

Sincerely,

Jack Heinrich
General Manager
Cripple Creek & Victor Gold Mining Co
Appendix E

Public Comment