



Gagnon - DNR, Nikie <nikie.gagnon@state.co.us>

Re: Hukill Gulch Mill Discharge Permit

1 message

Mason Drake <mason.drake@venturegoldusa.com>
To: "Gagnon - DNR, Nikie" <nikie.gagnon@state.co.us>
Cc: PATRICK MAHER <mptmaher@msn.com>

Wed, Apr 2, 2025 at 1:00 PM

Thank you, Nikie

I will be in touch with CDPHE.

Please find some photos attached from some of the restoration before the heavy snows. If you require more photos, I can take some more once the snow melts and we are able to regain access.

We have some financing committed, which should close in the next 45 days. Once that is completed, we will resume preparations for construction of a larger mill pursuant to the latest TR of our permit.

Thank you,

Mason Drake

CEO

Venture Gold, Inc.

www.venturegoldmining.com

phone: 540 270 7747









work we were able to accomplish

From: Gagnon - DNR, Nikie <nikie.gagnon@state.co.us>
Sent: Wednesday, April 2, 2025 12:30 PM
To: Mason Drake <mason.drake@venturegoldusa.com>
Cc: PATRICK MAHER <mptmaher@msn.com>
Subject: Fwd: Hukill Gulch Mill Discharge Permit

Hi Mason.

Please see the email below regarding the quarterly reporting requirements for the stormwater permit at the Hukill Gulch Mill. According to CDPHE, to correct the noncompliance issue, you will need to submit all delinquent quarterly Discharge Monitoring Reports. Contact Andrea at CDPHE if you have any questions on how to correct this.

I also asked CDPHE about the water stored in the tailings impoundment and confirmed that the water can remain in the structure to evaporate or can be pumped back into the milling process. The water in the tailings impoundment is part of the processing loop and considered process water. Therefore make sure everyone on site knows it cannot be discharged, even though it is primarily stormwater at this point. Note, the water will need to be removed to repair and recertify the liner, which is required before you start operating again. At that time, pump it into the adjacent tanks and up to the large aluminum tank at the mill.

As we discussed on the phone, please send me photographic evidence that the silt fence has been reinstalled and the required maintenance and clean up is complete and the boundary mark has been installed. My main concerns were the piping in the stormwater sediment pond and general clean-up and erosion control around the mill.

You indicated that you plan on restarting in the next 45 days. Please provide more details on when you will repair the liner and start operating again.

Best regards,

Nikie Gagnon

----- Forwarded message -----

From: Nestler - CDPHE, Andrea <andrea.beebout@state.co.us>
Date: Wed, Apr 2, 2025 at 11:38 AM
Subject: Re: Hukill Gulch Mill Discharge Permit
To: Gagnon - DNR, Nikie <nikie.gagnon@state.co.us>

Hi Nikie,

Thanks for reaching out. The permit certification (COR040302) requires quarterly monitoring (when discharges occur) and quarterly reporting, regardless of a discharge. This information is reported to the Division via Discharge Monitoring Report (DMR) forms. DMRs are required regardless of a discharge, and in those conditions can be marked "No Discharge." I don't see that any DMRs have been submitted for this facility, so at this point they would be in significant noncompliance for delinquent DMRs. Compliance oversight for this general permit has been under-resourced on our end, so the facility has not received compliance advisories for these violations. To correct these violations, the facility would need to submit all delinquent DMRs, which presumably could all be marked "no discharge" if there have not been stormwater discharges from the facility.

You can access a copy of the general permit [here](#) and a copy of the certification [here](#) to see an overview of the facility's monitoring and reporting requirements. They only need to sample if there is a stormwater discharge. I wasn't able to tell exactly from the information we have on file, but my guess is that all stormwater onsite drains to the pond? There's only one stormwater "outfall" delineated on the certification, but I'm not sure the lat/long is precisely accurate. As Emily noted, if there were historical process water discharges to the pond, any subsequent discharge may be considered process water as well.

Let me know if you have any additional questions.

Thanks,
 Andrea

On Tue, Apr 1, 2025 at 12:53 PM Gagnon - DNR, Nikie <nikie.gagnon@state.co.us> wrote:

Hi Andrea.

I'm reaching out to you for some information on a mill site stormwater permit. The site is the Hukill Gulch Mill in Clear Creek County. DRMS permit No. M2009076. The stormwater discharge permit is COR040302. This operation is permitted to mill historic mine tailings. They did some initial testing of the mill and ran some samples through it, however, this site has never been in production and has not operated at all since December 2018.

The facility has stormwater diversion channels that divert water around a tailings impoundment structure to a sedimentation pond below the tailings. Every time I've inspected the site, the sediment pond is dry. This site is at a high elevation outside Idaho Springs.

My question for you, is the operator in compliance with their stormwater permit? Do they have any permit requirements for monitoring/sampling? If so, do they sample only when there is a discharge from the sedimentation pond? I assume the rain/snowmelt soaks into the ground before it fills the pond at this site.

I appreciate you reviewing the permit history for this site. It's helpful for me to know your requirements when I'm conducting mine inspections and these sites that are not operating are a little different. Feel free to call me if it is easier to discuss over the phone.

Kind regards,

Nikie Gagnon

Environmental Protection Specialist



Cell: 720.527.1640

Physical: 1313 Sherman Street, Room 215, Denver, CO 80203

Address for FedEx, UPS, or hand delivery:

DRMS Room 215, 1001 E 62nd Ave, Denver, CO 80216

nikie.gagnon@state.co.us | <https://www.drms.colorado.gov>

----- Forwarded message -----

From: **Mortazavi - CDPHE, Emily** <emily.mortazavi@state.co.us>

Date: Tue, Apr 1, 2025 at 12:05 PM

Subject: Re: Hukill Gulch Mill Discharge Permit

To: Gagnon - DNR, Nikie <nikie.gagnon@state.co.us>

Yes, evaporation is acceptable.

No problem! Feel free to reach out anytime with questions.

Best,
Emily

On Tue, Apr 1, 2025 at 11:53 AM Gagnon - DNR, Nikie <nikie.gagnon@state.co.us> wrote:

Thank you for getting back to me on this. I spoke to the operator. The water in the impoundment is a combination of the residual process water from the initial testing of the mill, and snow rain falling into the impoundment since 2018. They've just been letting it evaporate. That's acceptable since they cannot discharge it?

I appreciate you helping me understand the requirements for these mining operations. Feel free to call me if you'd like to discuss this further over the phone 720-527-1640.

Kind regards,

Nikie Gagnon

On Tue, Apr 1, 2025 at 9:07 AM Mortazavi - CDPHE, Emily <emily.mortazavi@state.co.us> wrote:

Hi Nikie,

I am speaking to your questions about the permit. For compliance, you will have to check ECHO about that or you can contact Andrea Nestler (andrea.nestler@state.co.us) of our enforcement team.

When you say that they did some early test runs with a small amount of material several years ago. Did any of that process water circulate into the tailings pond? The COR040302 certification only covers stormwater. If any amount of the process water entered the tailings pond then it would be considered process water, even if it was years ago, and discharge the tailings pond would not be covered by the COR040302 certification.

If the test milling was isolated from the tailings pond then yes the pond could be dewatered through the outfall in the certification. Please note there are monitoring requirements: discharges that they would have to test for.

Please let me know if you have any further questions.

Best,
Emily

On Mon, Mar 31, 2025 at 1:31 PM Scott - CDPHE, Erin <erin.scott@state.co.us> wrote:

Erin Scott
Unit Manager
Industrial & Natural Resource Extraction Permitting Unit - Permits Section
P 303.692.3506
4300 Cherry Creek Drive South, Denver, CO 80246
erin.scott@state.co.us
www.colorado.gov/cdphe/wqcd
24-hr Environmental Release/Incident Report Line: 1.877.518.5608

----- Forwarded message -----

From: **Gagnon - DNR, Nikie** <nikie.gagnon@state.co.us>

Date: Mon, Mar 31, 2025 at 1:17 PM

Subject: Hukill Gulch Mill Discharge Permit

To: Erin Scott - CDPHE <erin.scott@state.co.us>

Hi Erin.

I left a voicemail for you, but I thought I'd follow up with an email and provide a bit of background on the site I'm calling about.

The mine site is the Hukill Gulch Mill in Clear Creek County. DRMS permit No. M2009076. The stormwater discharge permit is COR040302.

This operation is permitted to mill historic tailings. A lined tailings impoundment structure was constructed to hold the waste from the milling process. There's a concrete dam at the b During milling, water would be recycled and reused for the milling process. However, this site has never been in production. They did some early test runs with a small amount of m several years ago, but nothing has been milled since 2018.

Stormwater is collecting in the tailings impoundment. The impoundment is not holding any mill waste, just water. The attached photo shows that there was a few feet of water in the in September 2024 (see attached photo).

The facility has stormwater diversion channels around the impoundment and a stormwater sedimentation pond below the tailings structure, which is typically dry.

My question for you is related to the water in the impoundment. Should the operator pump out the stormwater, since at this point, the water is likely rain/snow and not production water since the mill is not operating? Are they currently in compliance with CDPHE?

Feel free to give me a call to discuss this site whenever it's convenient for you. I believe we spoke once before about the Bennett Pit in Adams County.

Kind regards,

Nikie Gagnon
Environmental Protection Specialist



COLORADO
Division of Reclamation,
Mining and Safety
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Andrea Nestler (Beebout)
Unit Lead
Clean Water Enforcement Unit



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