



COLORADO

Division of Reclamation,
Mining and Safety

Department of Natural Resources

MINERALS PROGRAM INSPECTION REPORT

PHONE: (303) 866-3567

The Division of Reclamation, Mining and Safety has conducted an inspection of the mining operation noted below. This report documents observations concerning compliance with the terms of the permit and applicable rules and regulations of the Mined Land Reclamation Board.

MINE NAME: Brighton Mine	MINE/PROSPECTING ID#: M-1977-436	MINERAL: Sand and gravel	COUNTY: Adams
INSPECTION TYPE: Surety-Related Inspection	WEATHER: Clear	INSP. DATE: September 2, 2025	INSP. TIME: 10:00
OPERATOR: Holcim - WCR, Inc.	OPERATOR REPRESENTATIVE: Wyatt Webster	TYPE OF OPERATION: 112c - Construction Regular Operation	
REASON FOR INSPECTION: Partial Acreage Release AR2	BOND CALCULATION TYPE: None	BOND AMOUNT: \$150,000.00	
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: None	JOINT INSP. AGENCY: None	
INSPECTOR(S): Nikie Gagnon	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: September 11, 2025	

The following inspection topics were identified as having Problems or Possible Violations. OPERATORS SHOULD READ THE FOLLOWING PAGES CAREFULLY IN ORDER TO ASSURE COMPLIANCE WITH THE TERMS OF THE PERMIT AND APPLICABLE RULES AND REGULATIONS. If a Possible Violation is indicated, you will be notified under separate cover as to when the Mined Land Reclamation Board will consider possible enforcement action.

INSPECTION TOPIC: Revegetation

PROBLEM #1: The operator has not completed grading of the north pond area consistent with the contours in the approved reclamation plan. Additionally, topsoiling and seeding tasks are not complete. This is a failure to follow the approved reclamation plan, or current reclamation plan needs to be updated and clarified pursuant to C.R.S. 34-32.5-116 (1).

CORRECTIVE ACTIONS: The operator must follow the approved reclamation plan or provide sufficient information to describe or identify how the operator intends to conduct reclamation. The operator shall submit a Technical Revision, with the required \$216 revision fee, to update and clarify the current approved reclamation plan for the north pond area to reflect existing and proposed activities by the corrective action date and submit a schedule for completing the reclamation tasks, grading, topsoiling and seeding in the north pond area.

CORRECTIVE ACTION DUE DATE: 11/10/25

INSPECTION TOPIC: Revegetation

PROBLEM 2: The Division observed state-listed noxious weeds present on site. This is a problem for failure to employ weed control methods for state listed noxious weed species within the permitted area, and to reduce the spread of weeds to nearby areas as required by Section 3.1.10 (6) of the rule.

CORRECTIVE ACTIONS: Implement approved weed control plan and provide proof to the Division by the corrective action date that this has been done. Evidence of completing weed control may be in the form of photographs showing dead plants after treatment or a receipt from a contractor for weed control.

CORRECTIVE ACTION DUE DATE: 10/10/25

INSPECTION TOPIC: Signs & Markers

PROBLEM 3: The permit sign was posted at the entrance to the site as required by Rule 3.1.12(1). The sign has the permit number and the name of the former operator. Pursuant to Rule 3.1.12(1)(a) and (b) the sign should list the current operator and include a statement that a reclamation permit for the operation has been issued by the Colorado Mined Land Reclamation Board.

CORRECTIVE ACTIONS: The operator will need to install a new mine sign at the entrance to the site that meets the requirements of Rule 3.1.12(1) and submit evidence of the sign in place to the Division.

CORRECTIVE ACTION DUE DATE: 10/10/25

OBSERVATIONS

This inspection was completed as part of an acreage release request (AR3), submitted in accordance with Rule 4.17, received by the Division on August 19, 2025. Nikie Gagnon with the Division of Reclamation, Mining and Safety (Division) conducted the inspection. Wyatt Webster, representing Holcim-WCR Inc. (Operator) along with Jason Helms and Elena Acker, representing the City of Thornton (City), accompanied the Division during the inspection.

The Brighton Mine is a 112c permitted site currently permitted for 61.40 acres. The original 112 permit area of 287.40 acres was split into three distinct parcels: the North, Central and South reservoirs. The Central and South reservoirs have been released from the permit and are operated by the City of Thornton. The North area remains in the permit, along with a gravel access road along the western boundary of the site, leading to a large stockpile of material stored in the southwest corner adjacent to the South reservoir.

The operator submitted an acreage release for 7.0 acres which includes the access road and large stockpile adjacent to the South reservoir. The access road and the stockpile are on land owned by the City of Thornton. On July 17, 2025, the City sent a letter to the Division (enclosed), indicating that they do not object to the operator leaving the stockpile in the place for Thornton's future use. During this inspection the Division observed the stockpile in the southwest corner of the permit area. The stockpile is stable and no erosion rills or gullies were observed. Shrubs, primarily rabbitbrush and sage, were observed on the south and west sides along with native grasses. Annual weeds interspersed with grasses cover the east and north sides. Vegetation on the slopes is sufficient to control erosion and meets the requirements of Rule 3.1.6(3).

On August 15, 2025, the City sent the Division an email confirming that the stockpile is stable that the City has an ongoing weed control program for the facility (enclosed). The last mowing event was in September 2024 and the stockpile and access road are maintained using mechanical methods as required by the program. The gravel access road leading to the stockpile was observed and is well maintained.

Based on the observations during this inspection, the Division will approve the request for a release of the 7.0 acres encompassing the stockpile and the gravel access road on the City property. A notice of the decision will be sent under separate cover.

The Division last inspected the north area in June 2022. At that time, the Division observed the north reservoir had been backfilled to cover exposed groundwater, and the operator was actively grading the area. During this inspection, the Division observed the reclamation progress in the north parcel.

Backfilling and Grading:

No mining or reclamation activity was occurring during this inspection. The north area has been backfilled and graded to relatively level. The operator stated that topsoil has been replaced on the graded areas. A large stockpile of mined material remains in the center of the north area. Concrete blocks from the truck scale are stored on east side of the stockpile. An excavator was observed next to some smaller stockpiles of material stored near the entrance to the mine. The smaller stockpiles are not vegetated, indicating the piles were placed there recently.

In 2013, Aggregate Industries submitted Technical Revision #5 which revised the reclamation plan and addressed backfilling and grading of the North area to reduce exposed groundwater. The approved Revision includes seeding 4.98 acres of upland, and grading 30.88 acres to varied contours, to provide for the establishment of a mix of upland, wetland and riparian zones, creating a diverse habitat for a variety of wildlife, migratory birds, and raptor species along the South Platte River. A shallow 0.5 acre or less shallow depression in the southeast area of the parcel is expected to establish as an emergent seasonal wetland

Based on the approved reclamation plan, the operator has not completed grading of the north reservoir area consistent with the contours in the approved reclamation plan. Additionally, it appears reclamation has stalled, and little has changed at the site since the last inspection in 2022. The current reclamation plan needs to be updated and clarified pursuant to C.R.S. 34-32.5-116 (1) and Rule 6.4.5 - Exhibit E. **As stated in Problem #1 above, by the corrective action date, the operator shall submit a Technical Revision, with the required \$216 revision fee, to update and clarify the current approved reclamation plan (Exhibit E) in accordance with Rule 6.4.5 to reflect existing and proposed activities. Additionally, per Rule 6.4.5(d), the updated plan shall include a schedule indicating how and when reclamation will be implemented.**

Revegetation

The Division observed dense grasses, forbs, sunflowers and annual weeds on the south and east sides of the northern parcel. In the backfilled pond area, annual weeds (russian thistle, yellow sweet clover) and sunflowers are the dominate species, interspersed with a few grass species. Bare ground was noted near the entrance to the site and along the interior haul road.

Weed Control

During the inspection, the Division observed patches of common mullein along the access road, and downy brome (cheat grass) and thistle plants interspersed with the grasses. **As stated in Problem #2 above, the operator should weed control in accordance with the approved weed plan and submit photo evidence to the Division that this has been completed**

Signs and Markers:

The permit sign was posted at the entrance to the site as required by Rule 3.1.12(1). The sign has the permit number and name of the previous operator. Per Rule 3.1.12(1)(a)(b) the sign should list the current operator and include the statement that "a reclamation permit for the operation has been issued by the Colorado Mined Land Reclamation Board." **As stated in Problem #3 above, the operator will need to install a new sign that meets all the requirements of the rule and submit evidence to the Division of the sign in place.**

A subset of photographs taken during the inspection are included below. Please contact Nikie Gagnon (303)866-3537 ext. 8126 or email at nikie.gagnon@state.co.us if you have any questions regarding this report.

PHOTOGRAPHS



Photo 1: Looking at vegetation established on the southeast side of the large stockpile on the City of Thornton property.



Photo 2: Looking at vegetation on the south side of the large stockpile on the City of Thornton property.



Photo 3: Shrubs observed growing on the west side of the large stockpile.



Photo 4: Closeup of bunch grasses established on the western slope of the stockpile.



Photo 5: Looking at the northeast corner of the large stockpile adjacent to the south pond. Grasses and annual weeds observed on the slopes.



Photo 6: Looking south at the graveled access road adjacent to the central pond on the City of Thornton property.



Photo 7: Looking south down the graveled access road adjacent to the south pond on the City of Thornton property.



Photo 8: Looking northeast across the northern pond area from the southwest corner. Native grasses and annual weeds and sunflowers observed here.



Photo 9: Looking east across the southern end of the north pond area. Native grasses, annual weeds and sunflowers observed.



Photo 10: Small stockpiles of material stored at the entrance to the mine site.



Photo 11: Large stockpile of material located in in the center of the mining area. Concrete blocks stored on the east side of the pile.



Photo 12: Downy brome (blue arrows) and thistles (red arrows) observed in the north area.



Photo 13: Common mullein observed in the north pond area, adjacent to the access road.



Photo 14: Annual weeds and sunflowers are the dominate vegetation in the backfilled portion of the north area.



Photo 14: An area of thistle plants observed near the entrance.



Photo 15: An excavator near the entrance next to some small stockpiles of material.



Photo 15: Mine sign posted at the entrance to the site listing the former operator. The sign should list the current operator and include a statement that a reclamation permit for the operation has been issued by the Colorado Mined Land Reclamation Board.



Figure 1: Map of the 7.0 acre stockpile and access road to be released, and the north area remaining in the permit.

GENERAL INSPECTION TOPICS

The following list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each

(AR) RECORDS----- <u>N</u>	(FN) FINANCIAL WARRANTY----- <u>N</u>	(RD) ROADS----- <u>Y</u>
(HB) HYDROLOGIC BALANCE----- <u>N</u>	(BG) BACKFILL & GRADING----- <u>Y</u>	(EX) EXPLOSIVES----- <u>N</u>
(PW) PROCESSING WASTE/TAILING---- <u>N</u>	(SF) PROCESSING FACILITIES----- <u>N</u>	(TS) TOPSOIL----- <u>N</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>N</u>	(FW) FISH & WILDLIFE----- <u>N</u>	(RV) REVEGETATION---- <u>PB</u>
(SM) SIGNS AND MARKERS----- <u>PB</u>	(SP) STORM WATER MGT PLAN---- <u>N</u>	(RS) RECL PLAN/COMP-- <u>Y</u>
(ES) OVERBURDEN/DEV. WASTE----- <u>N</u>	(SC) EROSION/SEDIMENTATION-- <u>N</u>	(ST) STIPULATIONS----- <u>N</u>
(AT) ACID OR TOXIC MATERIALS----- <u>N</u>	(OD) OFF-SITE DAMAGE----- <u>N</u>	

Y = Inspected / N = Not inspected / NA = Not applicable to this operation / PB = Problem cited / PV = Possible violation cited

Inspection Contact Address

Wyatt Webster
Holcim - WCR, Inc.
1687 Cole Blvd., Suite 300
Golden, CO 80401

Enclosures: July 17, 2025 letter from the City of Thornton, No Objection to Leaving Stockpile
August 15, 2025 email from Elena Acker, City of Thornton re: weed control.

CC: Jared Ebert, Senior EPS, DRMS



Water Resources Division | 12450 Washington St. | Thornton, CO 80241
720-977-6600 | City of Thornton | Thorntonco.gov

July 17, 2025

Ms. Nickie Gagnon
Division of Reclamation, Mining and Safety
1313 Sherman Street, Room 215
Denver, CO 80203

Re: Permit No. M- 1977-436 - Brighton Mine - Acreage Reduction (Partial Release) Request

Dear Ms. Gagnon:

City of Thornton (Thornton) has been requested to update a non-objection response to the above-referenced permit. The initial response from Thornton was provided August 29, 2018 and is attached.

Thornton, in accordance with the release requirement noted in the Division's August 2018 report with regard to a stockpile of material stored in the southwest corner of the permit area outside of the South Pond reservoir, submits this letter as documentation that it has no objection to leaving this pile in place for Thornton's future use along with access thereto.

Sincerely,

Emily Hunt
City of Thornton Deputy Utilities Director

cc: Elena Acker, Senior Water Resources Administrator
Wyatt Webster, Amrize, (Formerly Aggregate Industries)

Subject: RE: Brighton Mine - M1977436



Elena Acker <Elena.Acker@thorntonco.gov>

Fri, Aug 15, 7:25 AM (4 days ago)

to Gagnon - DNR, Nikie

Good Morning Nikie-

Thank you for this information! Please consider this response confirmation that the stockpile is stable and well vegetated. For weed mitigation, the city has an ongoing program for mechanical maintenance at all facilities, and the mowing crew is typically scheduled in the fall for this location. The last mowing event occurred in late September 2024. I can provide photos of current site conditions if you would like.

It is the intent of the city to use the stockpiled material on the city property for projects around the reservoirs and we commit to contacting the DRMS should we desire to truck the material offsite for future projects.

I appreciate your help in better understanding this process!

Respectfully,
Elena Acker

Elena Acker

Senior Water Resources Administrator
Infrastructure Department

Direct Line 720-977-6507

Main Line 720-977-6600

www.ThorntonWater.com

12450 Washington St., Thornton, CO 80241

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

Sent: Thursday, August 14, 2025 3:09 PM

To: Elena Acker <Elena.Acker@thorntonco.gov>

Subject: Brighton Mine - M1977436

Hi Elena.

I'm following up your questions regarding the release of the stockpile and road at the Brighton Mine. I received the letter that states that the City of Thornton has no objection to the stockpile remaining on the property. I just need confirmation, email is fine, that the stockpile is stable and well vegetated with grass and the weeds are well controlled.

Additionally, please acknowledge that the stockpiled material can be utilized on the City property, for projects around the reservoirs without a permit, but if it is moved off site, then a mining permit may be required. I recommend reaching out to the Division if you plan to start trucking the material off of the property. The Division may require a 110c or 111 permit depending on the amount that is being removed and where it is going.

Feel free to call me if you have any questions on this.

Kind regards,

--

Nikie Gagnon
Environmental Protection Specialist



COLORADO
Division of Reclamation,
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Department of Natural Resources

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