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NATURAL SODA

Pure & Natural Sodium Bicarbonate

Date: 27 March 2014

Travis Marshall
Environmental Protection Specialist
Division of Reclamation and Mine Safety
Colorado Department of Natural Resources
101 South 3rd, Suite 301
Grand Junction, CO 81501
ph: 970-241-2042
travis.marshall@state.co.us

TR34

m-1983-194

RECEIVED

MAR 28 2014

Division of Reclamation,
Mining & Safety

RE: REQUEST FOR TECHNICAL REVISION FOR NEW BARREN LINE

Dear Travis,

Natural Soda proposes to install a new 12"-diamater insulated pipeline that would extend from the Natural Soda plant at 3200 County Road 31 to the well pad for existing production well sets 10H-11H-12H-13H. This pipeline is required to accomodate plans for growth that have been described and approved in the 2010 Mine Plan for Natural Soda. Completion of the Plant Expansion in 2013 has provided capacity to realize the 2010 Mine Plan goal of 250,000 tons per year. At this time we are prepared to build additonal fluid circulation capacity between the expanded plant and the well field to support the added plant capacity.

The 12" line will be used to convey barren liquor (hot water) to the well field for flow into the injection wells. One of the existing 9" lines will be re-piped to convey pregnant liquor back to the plant. Pipeline configuration will result in one 12" line conveying barren liquor to the well field and two 9" lines conveying pregnant liquor to the plant, to complete the fluid-flow circuit. We propose to place this 12"-diameter pipeline within the same footprint as the existing 9"-diameter pipeline pair. Please refer to the accompanying map that highlights (red-dashed line) the existing pipeline route from the plant to well pad, along which the new pipeline will be placed.

Existence of the 12" line next to the current 9" lines will have negligible added environmental impact. Natural Soda commits to responsible installation of this 12" line during the construction phase. We will ensure minimal area of disturbance during construction, avoid muddy areas, avoid disturbing existing flora as much as possible. We will reclaim and resced all disturbance once construction is complete. End connections will be made on existing disturbed areas of the well pad and within the area of the plant.

In addition, we commit to placing all three pipes on stable cross-pipe support at ground level, similar to ground-level placement of the current section of pipeline done to provide minimal-disturbance access to the WPX well pad that has been installed near our plant. The pipeline set will be laid down upon 4"-

✓ AFE Report
✓ No Violations



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diameter steel pipe of length adequate to accommodate the width of the 3-pipe set. Some supports will be slightly elevated to account for local topography. Spacing between ground supports will be similar to existing elevated structures, approximately 20'. Pipe sections are 40' long, welded together to form the pipeline. As with the existing pipeline, support will be placed approximately 2 supports per pipe section. The width of all three pipelines together is target to be 50" total; allowing for diameter of each pipeline (9" for each existing, 12" new), 2"-thick insulation on each, and 4" spacing between pipelines.

When the existing supports are pulled from the ground, we plan to backfill these holes with material that was originally augured out to make the holes, which yet resides adjacent to the holes, and supplement as needed with a small amount of soil material that was residual from the recent plant expansion.

There is no current damage to the existing pipeline due to wildlife activity. Similarly, we do not expect to incur damage with the new arrangement. We have identified three positions in existing low spots and dry washes where wildlife and cattle trails currently exist, and animals pass under the existing pipelines. When lowered, the pipeline set will still free-span these low crossings with enough height to adequately allow passage of cattle and wildlife.

Natural Soda is staged to commence bringing pipe segments to site and commence construction as soon as the approvals are granted.

We have an application for this project submitted to the BLM, White River Field Office, in Meeker.

We would notify the BLM and CO-DRMS of actual commencement of pipeline construction and invite personnel to visit the project at any time during construction.

We are in process of sending check for the technical revision fee in the amount of \$1,006 to CO-DRMS office in Denver, with copy to you.

We do appreciate this opportunity to continue responsible and sustainable development of nahcolite resources within Piceance Creek basin.

Please advise if anything more is needed.

Best regards,

Michael Clark
Risk and Sustainability Superintendent
970-878-3674, x25
clarkm@NaturalSoda.com

copy: Paul Daggett, BLM White River Field Office

www.NaturalSoda.com
tel: 970-878-3674 x 25
cel: 830-613-0435
fax: 888-643-6061
clarkm@NaturalSoda.com

From: Marshall - DNR, Travis [<mailto:travis.marshall@state.co.us>]
Sent: Thursday, March 27, 2014 7:51 AM
To: Michael Clark
Cc: Daggett, Paul
Subject: Re: Natural Soda--New Barren Liquor line

Michael,

Thank you for the information regarding the proposed 12" barren liquor line. Due to the proposed structure introducing an additional reclamation liability a Technical Revision will be required to incorporate the pipeline into the reclamation permit. Please see the attached Rule 1.9 that covers the Technical Revision Process. Also, a fee of \$1,006.00 is required for technical revisions. Please let me know if you have any questions.

Travis Marshall

Environmental Protection Specialist

Minerals Program



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On Wed, Mar 26, 2014 at 2:45 PM, Michael Clark <clarkm@naturalsoda.com> wrote:

With attachments this time.

Thanks again.

Mike

Michael Clark

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Division of Reclamation,
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Extremely Urgent

Page 1 of 1

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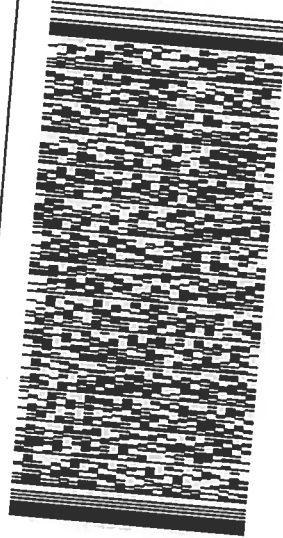
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SHIP TO: (970) 241-2042

Sharon Stanton

BILL SENDER

Division of Reclamation and Mine
Colorado Dept of Natural Resources
1313 Sherman St., Room 215
DENVER, CO 80203



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Division of Reclamation, Mining, and Safety

Fee Receipt for M1983194

Natural Soda, Inc.

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Receipt #: 17119

Date: 03/31/2014

Permit: M1983194

Payment Method	Revenue Code	Fee Description/Notes	Amount
23500 msr	4300-11	Minerals Technical Revision M1983-194	\$1,006.00
Receipt Total:			\$1,006.00