

August 14, 2017

Mr. Travis Marshall Environmental Protection Specialist Colorado Division of Reclamation, Mining and Safety 101 South 3rd, Suite 301 Grand Junction, CO 81501

## RE: Meeting Results and Proposed Relining of Logan Wash Mine Evaporation Pond

Dear Travis,

Western Water & Land, Inc. (WWL) on behalf of Occidental Oil Shale, Inc. (OOSI) would like to thank you and Division of Reclamation, Mining and Safety officials Mr. Tony Waldron and Mr. Russ Means for taking the time to meet with me and Mr. Roger Smith of Glenn Springs Holdings, Inc. (GSH), environmental managing company for OOSI on July 27<sup>th</sup> in your Denver office.

The purpose of the meeting was to discuss long term retort mine water discharge at Logan Wash Mine (permit no. M-1977-424). OOSI's preferred method of long-term treatment of the retort mine water is passive evaporation, the method that has been used since 1984. DRMS was in general agreement with this approach and agreed to approach the U.S. Bureau of Land Management (BLM) regarding possible transfer of jurisdiction of the passive treatment operations as the treatment activity occurs primarily on BLM lands.

Relining of the existing evaporation pond was also discussed during the meeting. Upon further consideration, OOSI proposes a relining plan that will simplify and expedite the relining project. The plan eliminates removal of the salt and sediment precipitates on top of the existing liner. Attempts to remove the material using a vacuum-truck were not successful and OOSI elected to not try using a skid loader to attempt to remove the material because of the potential for damage to the current liner and the underlying leak detection system. The sediment and salt deposits will remain in place between the current liner and the planned new liners until removal and reclamation during final pond closure.

Prior to relining, OOSI plans to install a geocomposite material directly on top of the existing liner and associated sediment and salt deposits. The geocomposite material will provide a smooth and uniform surface on the pond bottom. A double liner will be installed on top of the geocomposite material consisting of 60-mil liner on the bottom and a 80-mil liner on top; both will be composed of high density polyethylene (HDPE).

The double liner system on top of the existing liner will greatly reduce the potential for future leakage from the pond. If in the event leakage were to occur, the existing leak detection system would remain in place and continue to function.

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This plan is viewed as an operation and maintenance activity that would not require a Technical Revision. However OOSI will fully document the construction phase of the relining project and provide a construction completion report to DRMS when the work is complete.

Please consider the proposed plan and respond at your earliest convenience so that OOSI may proceed with project planning and construction this year.

Sincerely,

Bruce & Smith

Bruce D. Smith Principal Hydrogeologist WESTERN WATER & LAND, INC.

cc: Roger Smith, Sr. Project Manager, Glenn Springs Holdings, Inc. Wayne Werkmeister, Assoc. Field Manager, U.S. Bureau of Land Management, Grand Junction Field Office