



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
White River Resource Area
220 East Market
Meeker, Colorado 81641



In Reply Refer To:

LLCON050

3592

COC0118326-01

COC0118327-01

COC0119986-01

COC0119986-02

COC0119985-01

COC37474

MAR 01 2019

Natural Soda LLC.

Attention: Kirk Daehling

3200 County Rd. 31

Rifle, Colorado 81650

Dear Mr. Daehling:

We have reviewed Natural Soda's (NS) December 20, 2018 request to construct five well pads to accommodate seven injection/recovery wells, one water monitoring well, and associated pipeline, power, and access. We have also reviewed Natural Soda's request to relinquish COC77086 and replace the off lease portions of the well pads with a sodium use permit.

The proposed project is located in the 6th P.M., Township 1 South, Range 98 West, Sections 25, 26, 34, 35, and 36. This project is considered to be a minor modification to the approved Natural Soda Mine Plan and is approved with the following conditions of approval (COA). Please take special notice of COA Numbers 7 and 8 timing limitations and raptor surveys on construction activities.

1. All activities shall comply with NS's approved reclamation and Mine Plan.
2. NS is responsible for informing all persons who are associated with the project that they will be subject to prosecution for knowingly disturbing archaeological sites or for collecting artifacts.
3. If any archaeological materials are discovered as a result of operations under this authorization, activity in the vicinity of the discovery will cease, and the BLM WRFO Archaeologist will be notified immediately. Work may not resume at that location until approved by the AO. The NS will make every effort to protect the site from further impacts including looting, erosion, or other human or natural damage until BLM determines a treatment approach, and the treatment is completed. Unless previously determined in treatment plans or agreements, BLM will evaluate the cultural resources and, in consultation with the State Historic Preservation Office (SHPO), select the appropriate mitigation option within 48 hours of the discovery. The NS, under guidance of

the BLM, will implement the mitigation in a timely manner. The process will be fully documented in reports, site forms, maps, drawings, and photographs. The BLM will forward documentation to the SHPO for review and concurrence.

4. Pursuant to 43 CFR 10.4(g), the applicant must notify the AO, by telephone and written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), the operator must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the AO.
5. NS is responsible for informing all persons who are associated with project operations that they will be subject to prosecution for disturbing or collecting vertebrate or other scientifically-important fossils, collecting large amounts of petrified wood (over 25lbs./day, up to 250lbs./year), or collecting fossils for commercial purposes on public lands. If any paleontological resources are discovered as a result of operations under this authorization, the applicant must immediately contact the appropriate BLM representative.
6. Any excavations into the underlying native bedrock must be monitored by a permitted paleontologist. The monitoring paleontologist must be present before the start of excavations that may impact the underlying rock.
7. Development activities will be prohibited from December 1 through April 30 to avoid disruption of big game during the critical winter period. Construction and development activities will be permitted from May 1 through November 30.
8. Raptor surveys will be conducted in suitable woodland habitat within 300 meters of the proposed sites prior to construction activities. Contact the WRFO wildlife biologist Lisa Belmonte (970-878-3816 or lbelmont@blm.gov) prior to the surveys for additional information. If an active nest is located, construction activities would not be permitted until August 15 or until young have fledged.
9. Prior to construction of the 16-17H-1V wells and pad NS must submit to the WRFO verification from Simple Oil that the construction would not adversely affect the development of Simple Oil's Oil Shale Research, Development and Demonstration Lease COC74299.
10. Notify our office a minimum of 24 hours prior to the commencement of construction, drilling and reclamation activities.
11. Prior to commencement of operations NS shall submit complete well permit applications for all wells that contains, at a minimum, the following:
 - Survey Plat of drilling location
 - Location map
 - Construction layout diagrams
 - Cut and fill diagrams
 - Drilling and completion prognosis that includes the directional drilling plan, well specification and data sheet along with depths to water bearing and stratigraphic units.

Natural Soda must submit \$50.00 (\$30.00 filing fee and first year rental of \$20.00) prior to issuance of the 40 acre use permit COC0119986-02 located in the 6th P.M., Township 1 South, Range 98 West, Section 34, Lot 1 and Section 36 Lot 4. Subsequent annual rental will be \$40.00 (\$1.00 per acre) due on or before the anniversary date of the permit. The BLM will send a signed

and dated copy of the use permit upon receipt of payment. Payment may be submitted by check to the address above or by phone via credit card by contacting Kindall Nay 970-878-3801. Be certain to include the use permit serial number COC0119986-02 when making payments.

If there any questions, please contact Paul Daggett Mining Engineer at (970) 878-3819.

Sincerely,



Lauren Brown
Associate Field Manager

cc:

Travis Marshall
Grand Junction Field Office
Colorado Division of Reclamation, Mining and Safety
101 South 3rd, Suite 301
Grand Junction, CO 81501

Daub & Associates, Inc.
1985½ South Broadway
Grand Junction, CO 81507-9649

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MINING AND SAFETY**

