

DAUB & ASSOCIATES, INC.



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January 29, 2021

Division of Reclamation, Mining and Safety
Attn: Minerals Division, Amy Yeldell
1313 Sherman Street, Room 215
Denver, CO 80203

Received Electronically by DRMS
February 1, 2021

Re: **Natural Soda LLC Nahcolite Project File No. M-1983-194, Technical Revision (TR-45) Adequacy Review Response - 2**

Dear Ms. Yeldell:

The following are the responses to the questions in the DRMS Adequacy Review of the BG-11 (TR-45) dated January 29, 2021.

- **DRMS Comments:** Please commit to provide the Division with the same monthly groundwater reports provided to the BLM for a period of 12 months.
 - **NS Response:** Pursuant to our discussion on January 29, 2021, our agreement was to continue monitoring BG-4 and BG-6 monthly, BG-1 quarterly, and AG-1 annually. We will provide the DRMS with data for the four subject wells for a period of 12 months. Any indication of a significant deviation from baseline, the DRMS will be notified immediately.
- **DRMS Comments:** IRI-EX-2 and MMC-IRI-1 were previously noted as being recompleted to a different zone than originally drilled which have the potential for aquifer communication issues. The two wells were not referenced in the sampling commitments made under adequacy response #1. Please provide a reason for the wells not being referenced. Due to the potential for aquifer communication issues with IRI-EX-2 and MMC-IRI-1 the Division requires the monthly water quality reports to be submitted for a period of 12 months.
 - **NS Response:** The IRI-EX-2 and MMC-IRI-1 were included erroneously on the list of A-Groove and B-Groove monitor wells. The IRI-EX-2 was drilled in 1985 and is a Dissolution Surface Aquifer water level monitor well. The IRI-EX-2 is a water level only well due to its very low recharge rate and is scheduled for plugging and abandonment in 2021. The MMC-IRI-1 was drilled in 1980 and recompleted as a Perched Aquifer monitor well in 1990 and has exhibited typical Perched Aquifer constituent ranges since 1990. The inclusion of these two wells in the January 14, 2021 email was a mistake.

Should you have any questions or comments, please contact me at (970) 254-1224 or (970) 216-1010 (c), or Kirk Daehling at (970) 456-1268.

Regards,



Gerald J. Daub, PG, CPG
President
Daub & Associates, Inc.

Cc: Kirk Daehling
President
Natural Soda LLC

Kent Walters
Bureau of Land Management (WRFO)

Amy Yeldell (via email)
Colorado Division of Reclamation, Mining and Safety

File