



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 8**

1595 Wynkoop Street  
Denver, CO 80202-1129  
Phone 800-227-8917  
[www.epa.gov/region8](http://www.epa.gov/region8)

Ref: 8WD-SDU

**SENT VIA EMAIL  
DIGITAL READ RECEIPT REQUESTED**

Kirk Daehling  
Natural Soda LLC  
[kdaehling@naturalsoda.com](mailto:kdaehling@naturalsoda.com)

Re: EPA UIC Area Permit CO30358-00000  
Add Well to Area Permit: 17H-IR-E (CO30358-12115)  
Rio Blanco County, Colorado

Dear Mr. Daehling:

Natural Soda LLC's (NS's) request to drill and construct the 17H-IR-E well as an injection well under the NS Area Permit is hereby authorized by the Environmental Protection Agency Region 8. The addition of the proposed 17H-IR-E injection well is being made under the authority of 40 CFR §144.33 (c) and terms of the NS Area Permit CO30358-00000 and subsequent modifications.

Please be aware that NS does not have authorization to begin injection operations until all Requirements Prior to Commencing Injection have been submitted and evaluated by EPA and NS has received written authorization from the Director to begin injection.

Please submit the required data to William Gallant by email at [gallant.william@epa.gov](mailto:gallant.william@epa.gov). If you have any questions, please contact William Gallant at (303) 312-6455 or (800) 227-8917, extension 312-6455 or by email.

Sincerely

7/2/2021

**X** Lisa Kahn

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Lisa Kahn  
Acting Chief, Safe Drinking Water Branch, ...  
Signed by: LISA KAHN

Enclosure: Authorization for Additional Well

cc: Paul Daggett, BLM  
Travis Marshall, CDRMS  
Amy Yeldell, CDRMS  
Jerry Daub, Daub & Associates



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**AUTHORIZATION FOR ADDITIONAL WELL**

**UIC Area Permit No: CO30358-00000**

The Natural Soda LLC (NS) Final UIC Area Permit No.CO30358-00000, effective July 20, 2017, authorizes construction or conversion of additional injection wells to be included in the Area Permit for the purpose of solution mining in the NS lease. Pursuant to 40 CFR §144.33, UIC Area Permit No. CO30358-00000 authorizes the permittee to construct injection well 17H-IR-E, within the Area Permit:

Well Name:	<b><u>17H-IR-E</u></b>
EPA Well ID Number:	<b><u>CO30358-12115</u></b>
Location:	61.5' FNL & 359.9'
FWL	Sec. 36 T1S-R98W

After completion of construction or conversion of these wells, the Permittee shall submit the required information found in the Permit and subsequent modifications, Part II. Section B. Requirements Prior to Commencing Injection, and obtain a written authorization to commence injection.

This Authorization to construct or convert additional injection well(s) is effective upon signature.

Date: 7/2/2021

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7/2/2021

**X** Lisa Kahn

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Lisa Kahn  
Acting Chief, Safe Drinking Water Branch, ...  
Signed by: LISA KAHN

*\* The person holding this title is referred to as the Director throughout the Permit and Authorization*

Requirements Prior to Authorization to Add Well	Document Summary
A completed EPA Form 7520-6 injection well application	completed 7520-6 form received
If different from the approved well construction plan in APPENDIX A, a well schematic and construction details of the additional well to meet the well construction requirements described in Section A of this Permit;	Well construction plans received are consistent with APPENDIX A and Previous wells constructed
A remedial plan for addressing the repair and use of any injection well found not to be properly cemented or completed as required by Section A.1 of this Permit. The EPA shall evaluate this information and determine if remediation or well closure of any injection well is warranted;	No remedial Plans required
If a converted well, a well schematic and construction details of the well to meet the well construction requirements described in Section A of this Permit shall be provided. This information shall also include casing and cementing details (cement evaluation log, if available), depths to top and bottom of USDWs, confining zone, and injection zone, and formation depths;	New Well
A topographic map extending to at least ¼-mile radius Area of Review (AOR) from the well and information on all wells within a 1/4 mile of the injection well location. If an AOR review well penetrates the confining zone and has not been previously identified, this information shall also include the completion report including casing and cementing details, CBL (if available), depths to top and bottom of any USDWs, formation depths, and P&A record (if applicable);	Map provided. No new AOR wells within 1/4 mile of proposed well.
For wells in the AOR which are improperly sealed, completed, or abandoned, the Permittee shall develop a corrective action plan consisting of the steps or modifications that are necessary to prevent movement of fluid into USDWs;	NA. No Corrective action planned required
As required in Section E.3 and E.4 of this Part, site location and construction details of the proposed subsurface subsidence monitoring well and surface subsidence monument. If the location is different than at the intersection of the injection and recovery well, justification for the alternative location shall be provided.	Subsurface subsidence well consistent with previous wells
A completed EPA Form 7520-14 injection well plugging and abandonment plan. If different from the approved plugging and abandonment plan in APPENDIX E, submit a plan for plugging and abandonment that includes a well schematic and description of type, number, and placement of the plugs and method used to place the plugs. The plan should demonstrate adequate protection of USDWs; and	7520 -14 form and P&A schematic provided and consistent with Appendix E.
Demonstration of financial responsibility and resources to close, plug, and abandon the well.	FR Cleared by Benvia email 21 June, 2021