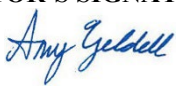




MINERALS PROGRAM INSPECTION REPORT
PHONE: (303) 866-3567

The Division of Reclamation, Mining and Safety has conducted an inspection of the mining operation noted below. This report documents observations concerning compliance with the terms of the permit and applicable rules and regulations of the Mined Land Reclamation Board.

MINE NAME: Yankee Gulch Minerals Project	MINE/PROSPECTING ID#: M-1999-002	MINERAL: Carbonates	COUNTY: Rio Blanco
INSPECTION TYPE: Monitoring	WEATHER: Cloudy	INSP. DATE: August 8, 2023	INSP. TIME: 12:15
OPERATOR: Solvay Chemicals, Inc.	OPERATOR REPRESENTATIVE: Celina Akin	TYPE OF OPERATION: 112d-3 - Designated Mining Operation	
REASON FOR INSPECTION: Normal I&E Program	BOND CALCULATION TYPE: None	BOND AMOUNT: \$236,424.00- DRMS \$7,444,531.00- Total	
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: DRMS	JOINT INSP. AGENCY: None	
INSPECTOR(S): Amy Yeldell	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: August 21, 2023	

GENERAL INSPECTION TOPICS

This list identifies the environmental and permit parameters inspected and gives a categorical evaluation of each. No problems or possible violations were noted during the inspection. The mine operation was found to be in full compliance with Mineral Rules and Regulations of the Colorado Mined Land Reclamation Board for the Extraction of Construction Materials and/or for Hard Rock, Metal and Designated Mining Operations. Any person engaged in any mining operation shall notify the office of any failure or imminent failure, as soon as reasonably practicable after such person has knowledge of such condition or of any impoundment, embankment, or slope that poses a reasonable potential for danger to any persons or property or to the environment; or any environmental protection facility designed to contain or control chemicals or waste which are acid or toxic-forming, as identified in the permit.

(AR) RECORDS----- <u>Y</u>	(FN) FINANCIAL WARRANTY----- <u>Y</u>	(RD) ROADS----- <u>Y</u>
(HB) HYDROLOGIC BALANCE----- <u>Y</u>	(BG) BACKFILL & GRADING----- <u>Y</u>	(EX) EXPLOSIVES----- <u>NA</u>
(PW) PROCESSING WASTE/TAILING---- <u>NA</u>	(SF) PROCESSING FACILITIES----- <u>Y</u>	(TS) TOPSOIL----- <u>N</u>
(MP) GENL MINE PLAN COMPLIANCE- <u>Y</u>	(FW) FISH & WILDLIFE----- <u>Y</u>	(RV) REVEGETATION---- <u>Y</u>
(SM) SIGNS AND MARKERS----- <u>Y</u>	(SP) STORM WATER MGT PLAN---- <u>Y</u>	(RS) RECL PLAN/COMP-- <u>Y</u>
(ES) OVERBURDEN/DEV. WASTE----- <u>NA</u>	(SC) EROSION/SEDIMENTATION--- <u>Y</u>	(ST) STIPULATIONS----- <u>Y</u>
(AT) ACID OR TOXIC MATERIALS----- <u>NA</u>	(OD) OFF-SITE DAMAGE----- <u>NA</u>	

Y = Inspected / N = Not inspected / NA = Not applicable to this operation / PB = Problem cited / PV = Possible violation cited

OBSERVATIONS

This inspection was conducted as part of the Colorado Division of Reclamation, Mining, and Safety normal monitoring program. The Yankee Gulch Minerals Project is a 112d (3) Hard Rock permit that is in final reclamation. The site is located 22 miles southwest of Meeker, Colorado in Rio Blanco County. Amy Yeldell of the Division conducted the inspection. Celina Akin represented Solvay Chemicals, Inc. (American Soda). No representative of the White River Field Office BLM was present for the inspection.

The total bond held between the Division and the BLM is \$7,444,531.00. The Division's portion is 5% of the total bond. The Division currently requires a financial warranty amount of \$236,424 for this site. The BLM holds the remaining bond amount. The bond was last increased in 2004 with AD-1. The bond was not recalculated with this inspection. The current bond amount is considered to be sufficient given that the site is in final reclamation.

The Division walked the pipeline/access roads and pads along the ridge, see photos 1-8. The following pads and associated roads were observed; Pad 20-36, Pad 20-32, Pad 20-35, Pad 20-33, Pad 20-76, and Pad 29-4. Overall, all grading and contouring is complete. No pits or stockpiles remain. The affected lands naturally blend with the surrounding topography. Affected lands have been seeded and vegetation is well established. Generally, reclaimed areas are a diverse blend of grasses, forbs and shrubs. Overall, vegetative cover and density is comparable to the surrounding undisturbed areas. Little to no weeds were observed. The operator should continue noxious weed management so long as the site remains permitted. Treatments with backpack sprayers and/or via horse are preferred at this time to limit vehicle disturbances to successfully reclaimed areas. No trash or other debris was observed. Vegetation appears to be stabilizing the soils well and no signs of excessive erosion or sedimentation were observed. Of the portions of the well field observed, the Division feels that final reclamation has been achieved.

The plant area was also inspected, see photos 9-11. According to Ms. Akin this asset (building, equipment, land, etc.) has been transferred to another operator. Please provide the Division with documentation that Solvay is no longer responsible for the maintenance or removal of this feature. AM-1 changed the postmine land use for this area to commercial industrial, and therefore the area is eligible for a release.

No acreage reductions (AR) have been approved to date. Several areas if not the entire site may be eligible for release. However, there are a few housekeeping items prior to the Division being able to process this request. 1) Ms. Akin stated that Solvay is no longer the Operator as the company has undergone a name change. Prior to requesting release, a Succession of Operator must first be completed. Only the Permittee can request a release. 2) The Operator must provide the Division with Final Report documentation per Rule 5.4.1(3) and 5.7. The Division needs the final plugged and abandoned (P&A Reports) for all wells. Please include a spreadsheet summarizing this information (well name/number, date completed, TD, P&A date, cmt interval, bridge plug depth if applicable). 3) Ensure that all reclamation plan maps accurately reflect the current site conditions. If any features are different that the approved Reclamation Plan Map, please submit in the form of a technical revision, revised map(s) with an accompanying narrative explaining the changes.

Once the three items listed above have been completed, the Operator may request full or partial release as they see appropriate. Given the vast nature of this site the Operator shall provide photo documentation (drone or aerial would also be helpful) of all pads and roads demonstrating that all affected lands have been reclaimed and that vegetation establishment is sufficient.

If a full/final release or a surety reduction is requested, the requirements of Rule 4.17.4(1) shall also be addressed in addition to the requirements of Rule 4.17.1, because this site is a DMO. This is the public notice requirement. The Operator should pay special attention to Rule 4.17.4(2) that states release of financial warranty may only be requested every 5 years.

Responses to this inspection report should be directed to Amy Yeldell at the Division of Reclamation, Mining and Safety, 1313 Sherman St., Room 215, Denver, CO 80203. Direct contact can be made by phone at 303-866-3567 Ext 8183 or via email at amy.yeldell@state.co.us

Inspection Contact Address

Celina Akin
Solvay Chemicals, Inc.
2717 County Road 215
Parachute, CO 81635

EC:
Travis Marshall, Senior EPS, Grand Junction DRMS
James Roberts, BLM

PHOTOGRAPHS





Photo 2: Pad 20-32



Photo 3: Pad 20-35





Photo 6: Pad 20-33.



Photo 7: Pad 20-76



Photo 8: Pad 29-4



Photo 9: Facilities remaining not use by different Operator



Photo 10: Facilities remaining not use by different Operator



Photo 11: Facilities remaining not use by different Operator