




**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.

<b>MINE NAME:</b> Nahcolite Project	<b>MINE/PROSPECTING ID#:</b> M-1983-194	<b>MINERAL:</b> Carbonates	<b>COUNTY:</b> Rio Blanco
<b>INSPECTION TYPE:</b> Monitoring	<b>WEATHER:</b> Clear	<b>INSP. DATE:</b> September 25, 2024	<b>INSP. TIME:</b> 13:30
<b>OPERATOR:</b> Natural Soda LLC	<b>OPERATOR REPRESENTATIVE:</b> Roy McClung	<b>TYPE OF OPERATION:</b> 112d-3 - Designated Mining Operation	
<b>REASON FOR INSPECTION:</b> Normal I&E Program	<b>BOND CALCULATION TYPE:</b> None	<b>BOND AMOUNT:</b> \$4,466,425.00	
<b>DATE OF COMPLAINT:</b> NA	<b>POST INSP. CONTACTS:</b> None	<b>JOINT INSP. AGENCY:</b> U.S.BLM	
<b>INSPECTOR(S):</b> Amy Yeldell	<b>INSPECTOR'S SIGNATURE:</b> 	<b>SIGNATURE DATE:</b> October 11, 2024	

**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>N</u>	(SF) PROCESSING FACILITIES----- <u>Y</u>	(TS) TOPSOIL----- <u>Y</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>N</u>	(RS) RECL PLAN/COMP-- <u>NA</u>
(ES) OVERBURDEN/DEV. WASTE----- <u>N</u>	(SC) EROSION/SEDIMENTATION-- <u>Y</u>	(ST) STIPULATIONS----- <u>Y</u>
(AT) ACID OR TOXIC MATERIALS----- <u>N</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 (Division) normal monitoring program. The Nahcolite Project is a 112d-3 permitted site that includes a total of 12,248 permitted acres with a maximum disturbance of 260 acres. At this time, approximately 100 acres have been affected. The site is located approximately 25 miles southwest of Meeker, Colorado in Rio Blanco County. Jamie Reck, Roy McClung and Jerry Daub represented the operator and accompanied Amy Yeldell of the Division on the inspection. Tom Cummings represented the White River Field Office BLM.

This is the third quarter inspection for 2024. The focus of this inspection the well field. No acreage reduction or other release request has been submitted to date. There are no open revision for this permit. No changes to production level or staffing have occurred or are anticipated in the near future. Division staff first checked in at the main office.

### **Explosives:**

Explosives are not used in conjunction with this operation.

### **Financial Warranty:**

The Division holds \$4,466,425.00 in financial warranty. The Division last updated the reclamation cost estimate in February of 2023 for TR-50. The bond is considered sufficient at this time and will not be recalculated as part of this inspection.

### **Fish and Wildlife:**

No animals were observed grazing the reclaimed pads during the inspection. Evidence of land use in the form of scat/manure was observed.

### **Other:**

The replacement 18H-IR-W well has the conductor set (Photo One). Drilling is anticipated to start in early October. The existing pit has been cleaned out to make more room to accommodate the new drill cuttings. The corner of the pad had to get reshaped for the new well location. The corner of the topsoil piled was carved out and the soil moved to increase the footprint of the pad within the existing disturbance (Photo Two).

18H-1V is completed but not tied in. The pit remains open. The drill rig is no longer on site. Some equipment associated drilling remains on site (Photo Three). The previously noted spill has been cleaned up (Photo Four).

The Division observed the anticipated location of the 19H-IR-E well pad. The APD has been sent to the BLM but to date the Division has no revision regarding this new pad location. A short access road will be required. The pad location is a mix of shrubs and grasses with the understory being primarily Cheatgrass. Some woody material removal will be required. (Photos Five and Six)

### **Right of Entry:**

The Operator has a valid Plan of Operations with the BLM which meets the requirements of Rule 6.3.7 for maintaining its Legal Right of Entry.

### **Reclamation Success:**

No areas are being released at this time.

Revegetation:

In general large populations of Russian Thistle were observed throughout the permit area. Though this is not a state listed noxious weed it is not a desirable plant and will interfere with reclamation. The Operator needs to more intensely manage non-desirable plant species.

Support Facilities On-site:

The Mill or other internal buildings were not inspected.

Signs and Markers:

A mine sign was posted at the turn off from CR 24 as required by Rule 3.1.12(1).

Permit Stipulations:

This is a Designated Mining Operation (DMO).

Topsoil:

The 18H-1V topsoil stockpile does not appear to have been seeded yet. Given that it will not be reapplied in the near future. In general all topsoil shall be reseeded. Likely the portion of the 18H-IR-E topsoil that was moved also need additional seeding.

The topsoil stockpile of the 17H-IR-E pad is overrun with Russian Thistle (Photos Seven and Eight). Noxious weed management applies to topsoil stockpiles as well as active and reclaimed well pad areas. The operator needs to aggressively manage the noxious weeds on this stockpile. Following up by seeding the stockpile will help protect the stockpile moving forward.

No problems or violations were noted during this inspection.

Responses to this inspection report should be directed to Amy Yeldell at the Division of Reclamation, Mining and Safety, Room 215, 1001 E 62nd Ave, Denver, CO 80216. Direct contact can be made by phone at 970-210-1272 or via email at amy.yeldell@state.co.us

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**PHOTOGRAPHS**



Photo 1: Replacement 18H-IR-W



Photo 2: Topsoil moved to increase footprint of the 18 pad for redrill.



Photo 3: Pad 18H-1V well completed, equipment on site.



Photo 4: Cleaned up spill area 18H-1V pad





Photo 7: 17H-IR-E pad topsoil pile covered in weeds.



Photo 8: Topsoil pile entirely Russian Thistle