



COLORADO
Division of Reclamation,
Mining and Safety
Department of Natural Resources

March 20, 2025

Roy McClung
Natural Soda LLC
3200 CR 31
Rifle, CO 81650

RE: Nahcolite Project, File No. M-1983-194, Technical Revision (TR-51) Adequacy Review #1

Dear Mr. McClung:

On March 20, 2025, the Division of Reclamation, Mining and Safety (Division) received and filed your Technical Revision request TR-51 for the Nahcolite Project, Permit No. M-1983-194. TR-51 requests to drill two new wells (19H-1V and 19H-IR-E) and construct one new pad. During review of the material submitted, the Division determined that the following issue(s) of concern shall be adequately addressed before the Technical Revision can be considered for approval. Please provide the following:

1. Please provide the anticipated surface hole location (SHL) for 19H-1V.
2. Provide an updated table tracking the amount of pipeline by size located on site. Specifically address the following changes;
 - a. What is the total length of additional pipe by size to be added for access to the 19H-1V well/pad?
 - b. What is the total length of additional pipe by size to be added for access to the 19H-IR-E well?
3. Will the construction of the new pipeline to pad 19H-IR-E require any significant contouring? If so, please provide the anticipated volumetrics. Historically the Division has only bonded for ripping, topsoil and reveg of roads.
4. Are the disturbed acres for proposed well pad access roads accounted for under the "proposed area of disturbance" of 3.76 acres listed on the pad map?
 - a. Please provide an updated "Well pad & Road Acreage Analysis" spreadsheet which includes the TR-51 proposed changes highlighted. Include both the addition of new well pad and road.

Please submit your response(s) to the above listed issue(s) by Monday, April 7, 2025 in order to allow the Division sufficient time for review A decision due date of April 17, 2025 has been set. If any adequacy issues remain by the decision due date the Division may deny your request. The Division will continue to review your Technical Revision and will contact you if additional information is needed.

If you require additional information, or have questions or concerns, please feel free to contact me.



Sincerely,

A handwritten signature in blue ink that reads "Amy Yeldell". The signature is written in a cursive, flowing style.

Amy Yeldell

Environmental Protection Specialist

Ec:

Travis Marshall, Senior EPS, Grand Junction DRMS

Tom Cummings, White River Field Office, BLM

Jamie Reck, EH&S Manager, Natural Soda

Gerald Daub, Consultant, Daub and Associates, Inc.