




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: Nahcolite Project	MINE/PROSPECTING ID#: M-1983-194	MINERAL: Carbonates	COUNTY: Rio Blanco
INSPECTION TYPE: Multi Person Inspection	WEATHER: Inclement/prevented Inspection	INSP. DATE: September 18, 2025	INSP. TIME: 08:00
OPERATOR: Natural Soda LLC	OPERATOR REPRESENTATIVE: None	TYPE OF OPERATION: 112d-3 - Designated Mining Operation	
REASON FOR INSPECTION: Normal I&E Program	BOND CALCULATION TYPE: None	BOND AMOUNT: \$4,466,425.00	
DATE OF COMPLAINT: NA	POST INSP. CONTACTS: DRMS	JOINT INSP. AGENCY: None	
INSPECTOR(S): Amy Yeldell Lucas West	INSPECTOR'S SIGNATURE: 	SIGNATURE DATE: September 18, 2025	

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

This is the third quarter inspection for 2025. Given wildfire activity in the area the Division has elected to do a records inspection rather than an onsite in-person inspection. Specifically, the Division is reviewing information that NSI's has submitted to the EPA for their Class III UIC permit.

Availability Of Records:

Natural Soda LLC holds Area Permit CO30358-00000 through the EPA. This permit was last revised under the FINAL-Major Area Permit Modification dated July 20, 2017.

On August 26, 2025, the Division requested NSI's last 2 years of EPA UIC Class III reports via email. On August 28, 2025, Jerry Daub provided the requested information. It included two Annual Reports, eight Quarterly Reports and a Tracking spreadsheet.

The Division did not review information pertaining to construction or abandonment of wells, only compliance reports of active injection wells were reviewed. Specifically, Section E Monitoring, Recordkeeping and Reporting Results, 7 Quarterly and Annual Reports states:

"Regardless of whether or not the well is operating, the Permittee shall submit a Quarterly Report to the Director that summarizes the results of the monitoring required by Part II Section D and APPENDIX D....The subsidence and groundwater monitoring report shall be submitted to the EPA annually...This report will also include results of the fieldwide groundwater monitoring program as described in APPENDIX D."

Section C Well Operation 2(a) and Appendix C state the Maximum Allowable Injection Pressure (MAIP) for the wells. All reported information was under the MAIP.

Section C Well Operation 3 and Appendix C states the maximum allowable temperature for the wells. All reported information was below the maximum temperature.

Appendix D of the Permit explicitly states monitoring parameters, method, permit condition, record frequency and quarterly report. For the reporting window reviewed, all reports appeared to include all required parameter information at the correct recording interval and reporting frequency.

It is noted that the Division staff had a meeting with the EPA on September 9, 2025, to better understand the EPA's UIC Class III program and requirements of NSI. EPA staff provided the Division with the most recently approved permit dated July 20, 2017. It was mentioned that no formal permit modification has occurred despite several wells being added and/or removed from the Area Permit. EPA staff indicated that they have recently reached out to NSI and requested that they update their permit. It is the Divisions expectation that NSI will modify their permit in a timely matter. Attached to this report is a table summarizing which wells are

permitted (authorized to inject through EPA) according to the Divisions records vs which wells are reporting Appendix D data during the review window.

Financial Warranty:

The Division requires \$6,023,901 in financial warranty. The Division last reviewed the reclamation cost estimate in July of 2025 for TR-51. The bond is considered adequate.

Other:

TR-51 has been approved. Until the additional financial warranty is accepted by the Division no proposed actives under TR-51 may commence.

Special Categories Of Mining:

This is a Designated Mining Operation (DMO).

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

Inspection Contact Address

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EC:

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Tom Cummings, BLM-White River Field Office
Jamie Reck, Natural Soda LLC
Jerry Daub, Daub and Associates, Inc.

Appendix D - Injection Well

Well Name									Comments	
	Q3-2023	Q4-2023	Q1-2024	Q2-2024	Q3-2024	Q4-2024	Q1-2025	Q2-2025		
7H-2I									No reporting and no P&A Rpt	Original 2017 well list
10H-I									Abandoned12/12/2020	
11H-I									No reporting and no P&A Rpt	
12H-I	Y	Y	Y	Y	Y	Y	Y	Y		
13H-I									Abandoned 6/11/2019	
14H-I									Abandoned12/12/2020	
8H-I									Abandoned 6/11/2019	
15H-I	Y	Y							Abandoned 10-5-2023	
16H-I	Y	Y	Y	Y	Y	Y	Y	Y		
17H-I	Y	Y							Abandoned 10-5-2023	
12H-IR	Y	Y	Y	Y	Y	Y	Y	Y	Requested to Add 5/11/2017	Added after 2017 Permit decision
8H-RI									Abandoned 6/11/2019	
13H-IR	Y	Y	Y	Y	Y	Y	Y	Y	Authorized 11/13/2018	
15H-RI	Y	Y	Y	Y	Y	Y	Y	Y	Authorized 5/22/2019	
17H-IR-E	Y	Y	Y	Y	Y	Y	Y	Y	Authorized 7/2/2021	
17H-RI	Y	Y	Y	Y	Y	Y	Y	Y	Authorized 6/16/2022	
18H-IR-W								Y	Authorized 6/22/2024	
19H-IR-E									Authorized 4/7/2024	
15H-1V									Authorized 4/7/2025	
13H-R(I)	Y	Y	Y	Y	Y	Y	Y	Y	Data reported, no EPA Authorization documented in laserfiche	
15H-IR-E	Y	Y	Y	Y	Y	Y	Y	Y		
16H-IR-E	Y	Y	Y	Y	Y	Y	Y	Y		