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July 11, 2012

Mr. Travis Marshall  
Colorado Division of Reclamation Mining & Safety  
Grand Junction Field Office  
101 South 3<sup>rd</sup>, Suite 301  
Grand Junction, CO 81501

**RECEIVED**  
JUL 12 2012  
GRAND JUNCTION FIELD OFFICE  
DIVISION OF  
RECLAMATION MINING & SAFETY

**Subject: Preliminary Adequacy Review, Natural Soda - Nahcolite Project, Permit No. M-1983-194, Amendment No. AM-03**

Dear Mr. Marshall:

Natural Soda, Inc. (NSI) received your preliminary adequacy review letter, and pursuant to our telephone conversation on 7/11/2012, submits the following response:

- 1) Clarification on the DMO designation is appreciated. We understand the move to make NSI a designated mining operation is based not on the product or process solution, but on the toxic chemicals and elements contained in groundwater within the Green River Formation.
- 2) Clarification of future surface disturbance for NSI is difficult and subject to abrupt change based on Boies Bed facies changes and the nature of the resource interval. The transition of the Boies Bed from nahcolitic to halitic is not understood well enough to plan well placement across the entire lease. Disturbance in the next ten years will occur in close proximity to the plant and immediately adjacent to existing wells, and to the best of NSI's ability, will utilize existing disturbance in some cases.

Per today's telephone conversation and the reasons detailed above, it was agreed between Mr. Marshall and Mr. Daub, that at least a 60 day prior written notice of intent to disturb be sent to the DRMS and would suffice.

- 3) A description of the measures taken to prevent unauthorized release of pollutants and reclamation measures are described in the NSI Mine Plan 2010.
  - a. NSI plant structures and facilities, including well design, pipelines and, reclamation, are discussed in Sections 6, 7, and 8 of the Mine Plan.
  - b. Attachment U of the AM-03 submittal discusses the facilities in place to prevent spills, and actions taken in the event of a spill are also discussed in detail.
- 4) Monitoring systems, monitoring locations, parameters sampled, sampling frequency, reporting requirements, and sampling analysis and methods are discussed in Section 8 of the Mine Plan and in great detail in the July 2010 NSI Comprehensive Monitoring Plan. The Comprehensive Monitoring Plan includes sampling and monitoring maps, as well as detailed charts for sampling frequency and parameters.

NSI has submitted all possible information regarding their facilities and environmental monitoring.

Travis, thanks for the clarification this morning. Should you have any questions or comments, please contact me at (970) 254-1224 or (970) 216-1010 (c), or Bob Warneke at (970) 878-3674 x14.

Regards,



Gerald J. Daub, P.G., C.P.G.  
President  
Daub & Associates, Inc.

Cc:

Bob Warneke  
Executive Director of Manufacturing  
Natural Soda, Inc.

Paul Daggett  
BLM, White River Field Office

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