



Celina Akin  
Environmental Specialist

2717 County Road 215  
Parachute, CO 81635

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Monday, August 6, 2012

ENV034.12

Mr. Nathan Wiser 8ENF-UFO  
U. S. Environmental Protection Agency  
Region VIII  
1595 Wynkoop Street  
Denver, CO 80202-1129

**RECEIVED**

AUG 07 2012  
GRAND JUNCTION FIELD OFFICE  
DIVISION OF  
RECLAMATION MINING & SAFETY

Dear Mr. Wiser:

As you are aware, American Soda conducted mechanical integrity testing of the remaining Class III injection wells in the Yankee Gulch Well Field on May 30 and 31, 2012. One of the conditions of temporary abandonment requires this testing to be performed every two years. During the testing in May, one well string failed (see table below for additional details on this well string).

Well ID	Stringer Failing MIT 5/31/2012	Size	Depth to CIBP	Dissolution Surface
28-21	Long String	7"	1615'	1460'

American Soda has been coordinating with contractors to finalize plans and schedules for the plugging and abandonment work on this well string. We understand that EPA notification is required in advance (45 days) of the work to plug and abandon wells so that EPA can review the plans and a representative may witness the testing if possible. This letter is intended to provide notification to the EPA that American Soda intends to plug and abandon the well string according to the information supplied in the preliminary plugging and abandonment plan which is attached.

Please review the information submitted in this plugging and abandonment plan and provide EPA approval so that we can finalize the purchase order for this work. We do not yet have confirmation of the date the plugging will be completed. Our discussions with the contractors who will be doing the work are currently focused on the last week of August or very early in September. As soon as we confirm a date I will contact you to let you know when it is scheduled. Please let me know if you can accommodate an EPA notification period shorter than 45 days for the plugging and abandonment work.

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We are making every endeavor to schedule the work to meet the 90 day time period from the date of the mechanical integrity testing on May 31, 2012 but due to the coordination effort with the vendors we may need to schedule slightly beyond the 90 day time frame.

We look forward to your review and approval of this plan. Once we receive your approval and can schedule and complete the work we will submit the final plugging and abandonment report on this well for your records.

Should you have any questions or comments regarding this information please contact me at (970) 285-0406.

Sincerely,

A handwritten signature in cursive script that reads "Celina Akin".

Celina Akin  
Environmental Specialist

Enclosures: Preliminary EPA Plugging and Abandonment plan Well 28-21  
Preliminary BLM Sundry Notice Plugging and Abandonment Well 28-21

Cc: Paul Daggett, BLM  
Travis Marshall, DRMS


 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 WASHINGTON, DC 20460

## PLUGGING AND ABANDONMENT

## NAME AND ADDRESS OF FACILITY

 American Soda L.L.P.  
 27991 County Road 5  
 Rifle, Co, 81650

## NAME AND ADDRESS OF OWNER/OPERATOR

 American Soda L.L.P.  
 2717 County Road 215  
 Parachute, Co, 81635
LOCATE WELL AND OUTLINE UNIT ON  
SECTION PLAT — 640 ACRES

N

X									

S

W

E

STATE

CO.

COUNTY

Rio Blanco

PERMIT NUMBER

CO3858-04567

## SURFACE LOCATION DESCRIPTION

 ¼ of ¼ of ¼ of ¼ of Section 28 Township 1S Range 97W  
 542.79' S. and 102.49' E. of NW corner of Section 28, Township 1S, Range 97W 6<sup>th</sup> P.M.

 LOCATE WELL IN TWO DIRECTIONS FROM NEAREST LINES OF QUARTER SECTION AND DRILLING UNIT  
 Surface Location 542.79' (S) from section corner and 102.49' (E) from section corner

 Elevation Casing Head = 6289' Elevation Ground Level = 6287'  
 15212.14 Easting 12376.71 Northing

## TYPE OF AUTHORIZATION

- X Individual Permit  
☐ Area Permit  
☐ Rule

Number of Wells 1

Lease Name Yankee Gulch

## WELL ACTIVITY

- CLASS I  
☐ CLASS II  
☐ Brine Disposal  
☐ Enhanced Recovery  
☐ Hydrocarbon Storage  
☒ CLASS III (Nahcolite Production Well)  
 Side by Side Dual 7" Casing Completion

Well Number 28-21

## CASING AND TUBING RECORD AFTER PLUGGING

SIZE	WT(LB/FT)	TO BE PUT IN WELL(FT)	TO BE LEFT IN WELL(FT)	HOLE SIZE
24"	95# - ERW	0	75'	24"
7"	26# - J-55 & N-80	0	1675' (short string)	19"
7"	26# -J-55 & N-80	0	1992' (long string)	19"

## METHOD OF EMPLACEMENT OF CEMENT PLUGS

- ☐ The Balance Method  
☐ The dump Bailer Method  
☐ The Two-Plug Method  
☒ Other  
 Coil Tubing Unit

## CEMENTING TO PLUG AND ABANDONED DATA

	PLUG #1	PLUG #2	PLUG #3	PLUG #4	PLUG #5	PLUG #6	PLUG #7
Size of Hole or Pipe in which Plug Will Be Placed (inches)	7" (Short)	7" (Long)					
Depth to Bottom of Tubing or Drill Pipe (ft.)	1675'	1675'					
Depth to Cast Iron Bridge Plug (ft.)	1615'	1615'					
Sacks of Cement Used (each plug)	290	290					
Slurry Volume Pumped (cu. ft.)	333.5	333.5					
Calculated Top of Plug (ft.)	Surface	Surface					
Measured Top of Plug (if tagged ft.)	Surface	Surface					
Slurry Wt. (Lb./Gal.)	15.8	15.8					
Type cement or other material (Class III)	Type G	Type G					

## LIST ALL OPEN HOLE AND/OR PERFORATED INTERVALS WHERE CASING WILL BE VARIED (if any)

From	To	From	To

August XX, 2012- Dissolution surface at 1460'. Well plugged and abandoned to Cast Iron Bridge Plug set at 1615'. Coil tubing placement of cement at bridge plug (1615'). Pumped 290 sacks of Type G, 15.8 pounds/gallon, 1.15 ft<sup>3</sup>/sack cement in the long string 7" casing. Short string 7" casing plugged and abandoned in Sept. 2008.

## CERTIFICATION

*I certify under the penalty of the law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. (Ref. 40 CFR 144.32)*

NAME AND OFFICIAL TITLE (Please type or print)

David Valvoda Plant Manager

SIGNATURE

DATE SIGNED

August XX, 2012

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

SUNDRY NOTICES AND REPORTS ON WELLS

Do not use this form for proposals to drill or to deepen or reentry to a different reservoir.  
Use "APPLICATION FOR PERMIT-" for such proposals

FORM APPROVED  
Budget Bureau No. 1004-0135  
Expires: March 31, 1993

5. Lease Designation and Serial No.  
Yankee Gulch CO-118328

6. If Indian, Allottee or Tribe Name  
N/A

7. If Unit or CA, Agreement Designation  
N/A

8. Well Name and No.  
American Soda L.L.P. 28-21  
EPA Class III CO3858-04567

9. API Well No.

10. Field and Pool, or Exploratory Area  
Central Piceance Creek Basin

11. County or Parish, State  
Rio Blanco, Colorado

SUBMIT IN TRIPLICATE

1. Type of Well  
☐ Oil Well ☐ Gas Well ☒ Other Nacholite Solution Mining

2. Name of Operator  
American Soda, L. L. P.

3. Address and Telephone No.  
2717 County Road 215, Parachute, Colorado 81635

4. Location of Well (Footage, Sec., T., R., M., or Survey Description)  
15,212.14 Easting NW ¼ of NW ¼ of Section 28, T1S, R97W 6<sup>th</sup> P.M.  
12,376.71 Northing

12. CHECK APPROPRIATE BOX(es) TO INDICATE NATURE OF NOTICE, REPORT OR OTHER DATA

TYPE OF SUBMISSION	TYPE OF ACTION	
<input type="checkbox"/> Notice of Intent	<input checked="" type="checkbox"/> Abandonment	<input type="checkbox"/> Change of Plans
<input type="checkbox"/> Subsequent Reports	<input type="checkbox"/> Recompletion	<input type="checkbox"/> New Construction
<input checked="" type="checkbox"/> Final Abandonment Notice	<input type="checkbox"/> Plugging Back	<input type="checkbox"/> Non-Routine Fracturing
	<input type="checkbox"/> Casing Repair	<input type="checkbox"/> Water Shut-Off
	<input type="checkbox"/> Altering Casing	<input type="checkbox"/> Conversion to Injection
	<input type="checkbox"/> Other	<input type="checkbox"/> Dispose Water
		(Note: Report results in multiple completion on Well Completion or Recompletion Report and Log form.

13. Describe Proposed or Completed Operations (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work. If well is directionally drilled, give subsurface locations and measured and true vertical depths for all markers and zones pertinent to this work.)\*

- On 7/21/2004 Well 28-21 dissolution surface at 1460'. Cast Iron Bridge Plug set at 1615' on 7" short string and 7" long string.
- On 9/11/2008 Well 28-21 7" short string failed MIT.
- On 12/18/2008 – Halliburton tripped coil tubing to the cast iron bridge plug at 1615' and pumped 290 sacks of Type G cement, 15.8 #/gallon, 1.15 ft<sup>3</sup>/sack cement, slurry volume 333.5 ft<sup>3</sup> in short string 7" casing.
- A cap is in place on the short string casing indicating the date of plugging and abandonment and the well identification.
- The wellhead is not cut down at this time since the long string 7" casing remains after passing MIT on 9/11/2008.
- On 5/31/2012 Well 28-21 7" long string failed MIT.
- August 2012 plugging and abandonment planned for Well 28-21 long string. Cast iron bridge plug set at 1615' (7/21/2004) same as short string.

14. I hereby certify that the foregoing is true and correct.

Signed \_\_\_\_\_ Title Plant Manager Date August XX, 2012

(This space for Federal or State office use)

Approved by \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

Conditions of approval, if any:

Title 18 U.S.C. Section 1001, makes it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

\*See Instruction on Reverse Side