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September 29, 2025

Utah Division of Water Rights  
1594 West North Temple, Suite 220  
PO Box 146300  
Salt Lake City, UT 84114-6300

*VIA EMAIL*  
waterrights@utah.gov

**Re: Public Comment Regarding GSL Distribution Management Plan**

To Whom it May Concern:

Compass Minerals Ogden Inc. (“Compass Minerals” or the “Company”) provides the following comment on the Great Salt Lake Distribution Management Plan (the “Plan”) prepared by the Utah State Engineer. Compass Minerals appreciates that the Plan reflects both the Company’s significant commitments to curtail diversions of its water rights used for mineral extraction and the non-consumptive nature of Water Right Nos. 13-1109 and 13-3345. However, Water Right No. 13-3871 (the “Water Right”) is also non-consumptive and should, like Water Right Nos. 13-1109 and 13-3345, also be omitted from the priority schedule in the Plan.

Water Right No. 13-3871 (the “Water Right”) is certificated for desalting the pumps Compass uses to pump brine out of ponds located on the west side of Great Salt Lake. Water under the Water Right is pumped from the well and used to rinse the pumps, which otherwise would stop working due to salt build up. After rinsing the pumps, this water flows to the Great Salt Lake via the Behrens Trench. Thus, all water pumped from the well returns to the hydrologic system. The non-consumptive nature of the Water Right was described in the Order of the State Engineer for Application to Appropriate Water Number 13-3871 (A77540) (“the right is non-consumptive, as the water is discharged into the Great Salt Lake”). Given the manner in which water under the Water Right is used and allowed to flow to Great Salt Lake, the beneficial use under the Water Right does not result in a net consumptive impact to the Lake.

Further, in the Voluntary Agreement between Compass Minerals and the Division of Forestry, Fire and State Lands (the “Agreement”), Compass Minerals agreed to physically measure diversions and return flows under its non-consumptive water rights and to develop a five-year rolling average mass balance approach for demonstrating that it is not depleting more

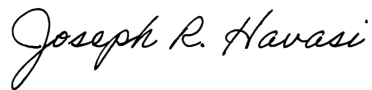
total water than authorized. This, in conjunction with the Company's agreement to significantly reduce consumption under its brine mining water rights based on the elevation of Great Salt Lake, should be considered sufficient regulation of Compass Minerals' water rights in the Plan.

The Company's use of Water Right No. 13-3871 does not result in a net consumptive impact to the Great Salt Lake. As such, Compass Minerals requests that the State Engineer amend the Plan to list Water Right No. 13-3871 as non-consumptive and omit the Water Right from the priority schedule.

Water Right No. 35-2343 is also used for non-consumptive purposes and was described as a non-consumptive right in the Agreement. The State Engineer included Water Right No. 35-2343 in the Plan, presumably because the certificate for Water Right No. 35-2343 included consumptive (i.e., sanitation) uses at a Pond Control Center. However, those consumptive uses are no longer occurring. As such, Compass Minerals will submit a Change Application that seeks to remove the consumptive uses and clarify the places of use and point of return under Water Right No. 35-2343. If the State Engineer approves that Change Application, Water Right No. 35-2343 should similarly be listed as non-consumptive and omitted from the priority schedule under the Plan.

The Company appreciates the opportunity to submit comments on the Plan. Please feel free to contact me if you would like to discuss this matter further.

Sincerely,

A handwritten signature in black ink that reads "Joseph R. Havasi". The script is cursive and fluid, with the first letters of each word being capitalized and prominent.

Joseph Havasi  
Vice President, Natural Resources