



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Natural Resources

COMMISSIONER'S OFFICE

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Tim Havey
Environmental Manager
Pebble Limited Partnership
3201 C Street Suite 404
Anchorage, AK 99503

April 19, 2018

Re: Miscellaneous Land Use Permit Application No. 6118

Dear Mr. Havey:

Attached to this letter please find the Miscellaneous Land Use Permit (MLUP) for Pebble Limited Partnership (PLP)'s care/maintenance, reclamation, and ongoing exploration/data collection activities for 2018. This letter and the attached adjudication summary and response to comments provides background information relevant to this permit, describes the permit's comprehensive terms and conditions, explains how the Alaska Department of Natural Resources (the Department) has addressed the significant number of public comments it received on PLP's permit application, and summarizes the Department's independent review and analysis of all of these topics. This information is being provided in light of the State's significant interests in land stewardship in the permit area and the concerns expressed by diverse stakeholders during the public process.

For purposes of quick reference, below are bullets regarding the key aspects of this permit:

- Authorization includes drilling and associated reclamation for 61 geotechnical (sonic or similar) boreholes and 19 diamond core drillholes to advance understanding regarding the regolith for future development planning and for ongoing resource evaluation. It also includes ongoing reclamation and remediation activities and any activity the Department may order during the term of the permit.
- The term is 1 year.
- Continued protective stipulations designed to reduce potential impacts on fish and wildlife, water, and land resources remain at the forefront of DNR's active management of the activities conducted across the permit site:
 - Mineral Closing Order 393 (Special Stipulation D) protects sensitive riparian areas and fish habitats within the project site.
 - Upper Talarik Creek Vegetative Buffer (Special Stipulation E) restricts vegetative disturbances to outside a 150' buffer of the ordinary high-water mark and states no structures are authorized within the buffer.
 - Caribou Calving Areas (Special Stipulations F) requires the operator to avoid or mitigate impacts to caribou calving in consultation with the Alaska Department of Fish and Game.

- Moose Calving, Rutting and Overwintering Areas (Special Stipulation G) requires the operator to coordinate with the Alaska Department of Fish and Game to establish best management practices for acoustical disturbances to moose calving and rutting.
- Bear Denning (Special Stipulation H) requires the operator to avoid occupied bear dens by ½ mile unless alternative mitigation measures are approved by the Department after consultation with the Alaska Department of Fish and Game.
- Waterfowl Molting Areas (Special Stipulation I) requires the operator to minimize potential impacts in concert with recommendations provided by consultation with the Alaska Department of Fish and Game.
- Drill Waste and Cuttings Management (Special Stipulation J) stipulates that the operator may not discharge drilling mud or cuttings into lakes, streams, rivers, or wetlands. This stipulation also requires the use of in ground sump pits, tanks or other filtration devices designed for cuttings management at any location which requires water or drilling muds to aid in drilling activity. It requires the operator to allow solids to sufficiently settle prior to backfilling and to reclaim the sumps in a manner which reasonably prevents oxidation.
- Reclamation and annual reporting under AS 27.19.050 and 11 AAC 96. The operator will be required to submit annual reporting detailing activities taken place in the year prior including exploration, reclamation, remediation, data collection and inspection. Requirements of the annual reclamation report are detailed in Special Stipulation L.
- A performance guaranty in the amount of \$2,000,000 is required pursuant to 11 AAC 96.060, conditioned on satisfaction of the permit terms and subject to approved reclamation. The amount of the performance guaranty will be reviewed annually and may be adjusted based on the Department's assessment of the site, completion of reclamation work and any other compliance obligations incurred under the permit.
- Insurance in the amount of \$2,000,000 is also required pursuant to 11 AAC 96.065. Insurance coverages play a key role in protecting the State's potential financial liability for activities conducted on State land. This requirement is consistent with the Department's authority to condition permits to protect the State and addresses concerns expressed by the public associated with financial risks of permitted activities.
- Included is a permit modification stipulation requiring the applicant to submit amendment requests with enough advanced notice to accommodate the public process. Under this stipulation, all modification requests will be public noticed for a minimum of 14 days. If a modification request requires any new boreholes, then a 30-day public notice period shall apply. Amendment applications must be submitted at least 60 days prior to the proposed commencement of activities.

During the public process, DNR received many comments asking DNR or PLP to conduct soil and water sampling. Commenters were concerned about potentials for acid rock drainage, high levels of metals in soil samples, dead vegetation, artesian drillholes

and drill cuttings on the tundra. In 2017, the Department conducted site evaluation with compliance staff from the Department of Environmental Conservation, observing 278 sites in total, and found the operator to be in acceptable compliance. The Department did not observe evidence of environmental contamination or activities which would unreasonably place fish and wildlife, water, or land resources at risk. Nonetheless, the Department will continue to inspect and observe site conditions for these potential impacts and if necessary, will conduct sampling or require PLP to conduct sampling.

Because this permit includes exploratory drilling activity, the Department will conduct additional compliance inspections to ensure full permit compliance. The Department will focus on new exploration-related activity, on-going reclamation activities, randomized site inspections and other aspects of administering the authorization which warrants further investigation.


This permit is issued in response to the application submitted by PLP, including the representations contained within the application regarding proposed activities. As stated in the permit itself, the permit only authorizes the activities PLP described in its application. In the event PLP identifies a need or intent to conduct activities that were not planned during the permit term, PLP must contact the Department and describe those activities before their initiation. Upon review by the Department, any such activities may require an amendment to this permit, a new permit, or permits from other regulatory agencies, and such activities may be subject to additional process or agency review as described above.

In light of topics discussed above, the permit application, applicable Alaska law, the full administrative record and file for the application, the material submitted by the public during the public comment period, PLP's compliance history, DNR's inspection reports, and the attachments to this letter further explaining the Department's review and analysis, issuance of the permit to PLP has been approved subject to its conditions and stipulations, applicable regulations, and Alaska law.

An affected person may request reconsideration of this decision as described in Section 19 of the "Terms of Permit" on page five of the attached permit.

The State will continue to work with PLP to ensure that the terms of this permit are met and reclamation proceeds as expeditiously as practicable in areas that are no longer part of PLP's exploration and monitoring program.

Sincerely,



Andrew T. Mack
Commissioner

CC: James Fueg, Pebble Limited Partnership

Attachments:

MLUP A20186118 Permit and Appendix 1: Mining Claim List
APMA A20186118 Adjudication Summary and Appendix 2: Public Comment Responses



THE STATE
of **ALASKA**

DIVISION *of* MINING,
LAND *and* WATER

**2018 MISCELLANEOUS LAND USE PERMIT
FOR EXPLORATION, MAINTENANCE, & RECLAMATION**

PERMIT # 6118

The Alaska Department of Natural Resources, Division of Mining, Land, & Water, in accordance with and subject to the requirements and general stipulations of Alaska Statute 27.19 (Reclamation), Alaska Statute 38.05 (Alaska Land Act); and Alaska Administrative Code Title 11, Chapter 86 (Mining Rights), Chapter 96 (Miscellaneous Land Use), and Chapter 97 (Mining Reclamation) does hereby grant a Miscellaneous Land Use Permit and Approved Reclamation Plan to:

**PEBBLE LIMITED PARTNERSHIP
PEBBLE WEST CLAIMS CORP.
PEBBLE EAST CLAIMS CORP.
3201 C STREET SUITE 404
ANCHORAGE, AK 99503**

This permit and Approved Reclamation Plan is for activities upon State lands described by the following locations: Appendix 1 (Mining Claim List), excluding valid, prior, and existing mineral rights. All activities are subject to the Terms of Permit attached hereto and incorporated in this permit, as well as subject to the terms and conditions set forth in the application, including any proposed Plan of Operations or other documentation made part of the application, which terms and conditions are also incorporated in this permit. Should any Terms of Permit and terms and conditions set forth in the application conflict, the Terms of Permit shall control.

Effective dates of this permit/approval shall be the date of signature through 12/31/2018, unless sooner revoked at will or for cause. In accordance with AS 27.19.050(c), you are required to file an Annual Reclamation Statement by December 31st each year this permit application is in effect, including photographs or video tape of the completed reclamation work. When submitting photography for approval, please photograph reclamation work prior to snowfall. Failure to submit this statement and photos may result in loss of exemption from reclamation bonding.

Activities may only be conducted on mineral locations listed in this authorization.

Changes to the intended Reclamation Plan described in Application for Permits to Mine in Alaska # 6118 shall be submitted to this office in writing and approved in advance before such work can begin.

Approved: _____

Sharon Mack
Commissioner
Department of Natural Resources

Date: _____

4/12/2018

TERMS OF PERMIT

Sec 1. RECLAMATION STIPULATIONS: In accordance with AS 38.05 (Alaska Land Act), AS 27.19 (Alaska Reclamation Act) and 11 AAC 97 (Reclamation) approval of your application is hereby granted and the following reclamation stipulations will be used:

- a. Topsoil and overburden muck, not promptly redistributed to an area being reclaimed, shall be separated and stockpiled for future use. This material shall be protected from erosion and contamination by acidic or toxic materials and shall not be buried by broken rock.
- b. The area reclaimed shall be reshaped to blend with surrounding physiography using strippings, and overburden, then be stabilized to a condition that shall retain sufficient moisture to allow for natural revegetation.
- c. Stockpiled topsoil, overburden muck and organic material shall be spread over the contoured exploration to promote natural plant growth.
- d. Exploration trenches shall be backfilled and the surface stabilized to prevent erosion. Brush piles, stumps, topsoil, and other organics shall be spread on the backfilled surface to inhibit erosion and promote natural revegetation. Exploration trenches will have water bars installed as needed for erosion control. Exploration trenches on state lands shall be flagged and signs posted to notify the public of the existence of the open trenches. All exploration trenches shall be reclaimed by the end of the exploration season in which they are constructed, unless specifically approved by the Division of Mining, Land & Water.
- e. Shallow auger holes (limited to depth of overburden) shall be backfilled with drill cuttings or other locally available material in such a manner that closes the hole to minimize the risk to humans, livestock and wildlife.
- f. All drill hole casings shall be removed or cut off at, or below, ground level unless otherwise specifically approved by the Division of Mining, Land & Water.
- g. All drill holes shall be plugged by the end of the exploration season during which they are drilled, unless otherwise specifically approved by the Division of Mining, Land & Water. Approved drill holes or monitoring wells shall be capped where practicable, in a manner which prevents water infiltration, contamination of groundwater, artesian conditions or tampering.
- h. All drill holes shall be plugged with bentonite holeplug, a benseal mud, or equivalent slurry, for a minimum of 10 feet within the top 20 feet of the drill hole in competent material. The remainder of the hole will be backfilled to the surface with drill cuttings. If water is encountered in any drill hole, a minimum of 7 feet of bentonite holeplug, a benseal mud, or equivalent slurry shall be placed immediately above the static water level in the drill hole. Complete filling of the drill holes, from bottom to top, with a bentonite holeplug, benseal mud, or equivalent slurry is also permitted and is considered to be the preferred method of hole closure.
- i. If artesian conditions are encountered, the operator shall contact the Department of Environmental Conservation (Allan Nakanishi (907) 269-4028) for hole plugging requirements.
- j. Upon completion of drilling activity, drill pads shall be reclaimed as necessary, including reseeding, to encourage natural revegetation of the sites and protect them from erosion.
- k. Roads and surface disturbance shall be held to a minimum. Exploration roads, drills pads and trenches shall be constructed in such a manner that vegetation and topsoil will not be buried beneath overburden or broken rock. This may require the use of a track excavator for construction of these facilities on slopes so as to allow for segregation of materials during construction and subsequent reclamation. Exploration roads will have water bars installed for erosion control, and at the end of the project will be reclaimed by backfilling, contouring, and spreading of organic rich overburden to promote stabilization and natural revegetation.

Sec 2. OPERATION OF VEHICLES OUTSIDE OF CLAIM BLOCK: No vehicle use outside of the claim block has been requested or is approved. Use of a snow machine is considered generally allowed use and is subject to provisions described in 11 AAC 96.025.

Sec 3. GENERAL PROVISIONS: Operations under this permit shall be conducted in conformance with applicable Federal, State, and local laws and regulations now, or hereafter, in effect during the life of the permit.

Sec. 4. PERFORMANCE GUARANTY: The permittee shall provide a surety bond or other form of security acceptable to the Division in the amount of \$2,000,000 payable to the State of Alaska. Such performance guaranty shall remain in effect for the term of this authorization and shall secure performance of the permittee's obligations hereunder. The amount of the performance guaranty may be adjusted by the Authorized Officer upon approval of amendments to this authorization, changes in the development plan, upon any change in the activities conducted or performance of operations conducted on the premises. If Permittee fails to perform the obligations under this permit within a reasonable time, the State may perform Permittee's obligations at Permittee's expense. Permittee agrees to pay within 20 days following demand, all costs and expenses reasonably incurred by the State of Alaska as a result of the failure of the permittee to comply with the terms of this permit. The provisions of this permit shall not prejudice the State's right to obtain a remedy under any law or regulation. If the authorized officer determines that the permittee has satisfied the terms and conditions of this authorization the performance guaranty may be released. The performance guaranty may only be released in a writing signed by the Authorized Officer. The Department reserves the right to evaluate the amount and scope of this performance guaranty it at any time during the permit term.

Sec. 5. INSURANCE: The permittee shall secure or purchase at its own expense, and maintain in force at all times during the term of this permit, the following policies of insurance to protect both the permittee and the permittor (the State, its officers, agents and employees). Where specific limits are shown, it is understood that they shall be the minimum acceptable limits. If the permittee's policy contains higher limits, the State shall be entitled to coverage to the extent of such higher limits. Certificates of Insurance must be furnished to the Authorized Officer prior to occupancy. The certificate must provide for a 60-day prior notice to the State in the event of cancellation, nonrenewal or material change of conditions. Failure to furnish satisfactory evidence of insurance, or lapse of the policy, are material breaches of this permit and shall be grounds, at the option of the State, for termination of the permit. All insurance policies shall comply with, and be issued by, insurers licensed to transact the business of insurance under Alaska Statute, Title 21.

- a. **Commercial General Liability Insurance:** Such policy shall have minimum coverage limits of \$2,000,000 combined single limit per occurrence. The policy shall be written on an "occurrence" form and shall not be written as a "claims-made" form unless specifically reviewed and agreed to by the Division of Risk Management, Department of Administration. The State must be named as an additional named insured on the policy with respect to the operations of the permittee on or in conjunction with the permitted premises, referred to as APMA A20176118.

Sec 6. SURFACE USE. A locator does not have exclusive use of the surface of the location. A locator may not restrict public access to the surface without approved authorization. (11 AAC 86.145) Issuance of this permit is not automatic authorization to restrict public access. In accordance with Alaska Statute 02.20.050, no airstrip, public or private, may be blocked or rutted in such a way as to endanger aircraft.

Sec 7. SURFACE STRUCTURES: The building, placing, or use of surface structures or other surface improvements, including airstrips and roads, within the boundaries of a mining property must be approved by the Director, in writing, through a plan of operations, land use permit, or other written authorization. (11 AAC 86.145) As indicated above, roads and airstrips cannot be blocked to restrict public access. Issuance of this permit is not automatic authorization for surface structures to remain beyond the expiration of this permit. Upon the expiration of this permit, if surface structures remain, they must be immediately authorized through another operations approval and land use permit or other written authorization, even if no mining is occurring, otherwise the surface structures will be deemed to be in trespass.

- a. The request to place and utilize and/or use existing structures listed in the application, during the time frame of activity is approved, subject to the stipulations contained in Section 8 of this authorization. Use of structures is authorized only for activities directly associated with the operations described in the application. Facilities shall not be used to conduct or support tourism related activities, hunting, fishing, or outfitting.
- b. Improvements, additions to, or enlargements of the existing structure are not authorized. Routine maintenance and upkeep is permitted. Routine maintenance is defined as normal and minor repairs which do not increase the size or scope of the existing structure.

- c. The building, placing, or use of surface structures or other surface improvements, including airstrips and roads, within the boundaries of a state mining property must be approved by the Director, in writing, through a plan of operations, land use permit, or other written authorization (11 AAC 86.145). Issuance of this permit is not automatic authorization to construct nor to place surface structures.

Sec 8. OTHER OPERATIONS:

- a. The Division reserves the right to grant additional authorizations to third parties for compatible uses on or adjacent to the land under this authorization. This authorization is subject to all valid existing rights in and to the land under this authorization. The State of Alaska makes no representations or warranties whatsoever, either expressed or implied, as to the existence, number, or nature of such valid existing rights.
- b. Where this permit grants the right to enter land owned, leased, or otherwise lawfully occupied by another, the permittee shall make provisions before entering the land to pay for all damages sustained by said owner, lessee, or lawful occupant by reason of entering upon said land. (AS 38.05.130).

Sec 9. ALASKA HISTORIC PRESERVATION ACT: The Alaska Historic Preservation Act (AS41.35.200) prohibits the appropriation, excavation, removal, injury, or destruction of any State-owned historic, prehistoric (paleontological) or archaeological site without a permit from the Commissioner. If cultural or paleontological resources are inadvertently discovered as a result of or during the activities authorized by this plan approval, all activities which would disturb such resources shall be stopped and measures taken to protect the site. The State Historic Preservation Officer (907-269-8722) shall be contacted immediately so that compliance with state laws may begin. If burials or human remains are found, in addition to the State Historical Preservation Officer, the State Troopers are to be notified immediately.

Sec 10. DISPOSAL OF BUILDINGS, STRUCTURES, AND DEBRIS ON STATE LAND: A miner shall remove, dismantle, or otherwise properly dispose of buildings and structures constructed, used, or improved on state land, unless granted written authorization for the structures to remain. A miner shall remove or otherwise properly dispose of all equipment, scrap iron, tools, piping, hardware, chemicals, fuels, waste, and general mining debris on state lands in a manner approved by ADEC ((11 AAC 97.210) and 11 AAC 96.040(f)). All structures, equipment, and debris remaining unclaimed on state land 180 days after the claims are no longer valid, are subject to disposition by the state as provided in 11 AAC 97.630. The locator shall pay to the state all costs of moving, storing, and disposing of such structures, equipment, and debris. The state shall not be responsible for any damages to or loss of structures and equipment caused by the moving, storing, or disposal.

Sec 11. INSPECTION AND ENTRY: Permittee shall permit the authorized representatives of the Division to enter into and upon the area and facilities covered under this plan approval at all reasonable times without notice.

Sec 12. VIOLATIONS: This authorization is revocable immediately upon violation of any of its terms, conditions, stipulations, nonpayment of fees, or upon failure to comply with any other applicable laws, statutes and regulations (federal and state). Should any unlawful discharge, leakage, spillage, emission, or pollution of any type occur due to permittee's, or its employees', agents', contractors', subcontractors', licensees', or invitees' act or omission, permittee, at its expense shall be obligated to clean the area to the reasonable satisfaction of the State of Alaska. A permittee who is charged & convicted of any violation of state hunting, trapping, and/or fishing license may be subject to revocation of this permit.

Sec 13. FUEL AND HAZARDOUS SUBSTANCES: Secondary containment shall be provided for fuel or hazardous substances in accordance with EPA Emergency Spill Response Regulations.

- a. All independent fuel and hazardous substance containers shall be marked with the contents and the permittee's or contractor's name using paint or a permanent label.
- b. During fuel or hazardous substance transfer, secondary containment or a surface liner must be placed under all container or vehicle fuel tank inlet and outlet points, hose connections, and hose ends. Appropriate spill response equipment, sufficient to respond to a spill of up to five gallons, must be on hand during any transfer or handling of fuel or hazardous substances. Trained personnel shall attend transfer

operations at all times. Vehicle refueling shall not occur within the annual floodplain or tidelands. This restriction does not apply to water-borne vessels provided no more than 30 gallons of fuel are transferred at any given time.

- c. Containers with an aggregate storage capacity of greater than 55 gallons which contain fuel or hazardous substances shall not be stored within 100 feet of a waterbody, or within 1,500 feet of a current surface drinking water source.
- d. Exceptions: The Authorized Officer may under unique or special circumstances grant exceptions to this stipulation on a case-by-case basis. Requests for exceptions should be made to the Authorized Officer.

Sec 14. NOTIFICATION: The permittee shall immediately notify the Division of Mining, Land & Water and the Department of Environmental Conservation, by telephone, of any unauthorized discharges of oil to water (including tundra); any discharge of hazardous substances other than oil; and any discharge of oil greater than 55 gallons solely to land and outside an impermeable revetment. If a discharge is greater than 10 gallons but less than 55 gallons it must be reported within 48 hours by telephone or fax. If a discharge is less than 10 gallons it may be reported in writing on a monthly basis. If an unauthorized discharge greater than 55 gallons is made to a secondary containment, it must be reported within 48 hours by phone or fax.

The DNR hour spill report number is (907) 451-2678; the fax number is (907) 451-2751. The DEC spill report number, for the Northern Region, is (907) 451-2121; the Southcentral Region is (907) 269-7548. The DEC 24-hour report number is (800) 478-9300. Division of Mining, Land & Water and ADEC shall be supplied with all follow-up incident reports.

Sec 15. CHANGE OF ADDRESS: Any change of address must be submitted in writing to the Division at 550 W. 7th Avenue, Ste 900B, Anchorage, Alaska 99503.

Sec 16. OTHER PERMITS: Be advised that issuance of this permit does not relieve the applicant of the responsibility of securing other permits required by Federal, State, or local authorities. Neither does this approval constitute certification of any property right nor land status claimed by the applicant.

Sec 17. SAVE HARMLESS: The recipient of this permit (permittee) shall indemnify, save harmless, and defend the Department, its agents and its employees from any and all claims, actions or liabilities for injuries or damages sustained by any person or property arising directly or indirectly from permitted activities or the permittee's performance under this permit. However, this provision has no effect, if, and only if, the sole proximate cause of the injury is the Department's negligence.

Sec 18. DEFAULT: If permittee should fail to comply with the terms and stipulations contained in this permit, the provisions of the Miscellaneous Land Use Regulations (11 AAC 96) and (AS 27.19), Reclamation Act, and after receiving written notice, fails to remedy such default within the time specified in the notice, the Director may cancel this permit.

Sec 19. REQUEST FOR RECONSIDERATION: A person affected by this decision may request reconsideration, in accordance with 11 AAC 02. Any reconsideration request must be received within 20 calendar days after the date of issuance of this decision, as defined in 11 AAC 02.040(c) and (d), and may be mailed or delivered to the Commissioner, Department of Natural Resources, 550 W. 7th Avenue, Suite 1400, Anchorage, Alaska, 99501; faxed to 907-269-8918, or sent by electronic mail to dnr.appeals@alaska.gov. This decision takes effect immediately. If reconsideration is not requested by the deadline, this decision becomes a final administrative order and decision of the department on the 31st calendar day after issuance. Failure of the commissioner to act on a request for reconsideration within 30 calendar days after issuance of this decision is a denial of reconsideration and is a final administrative order and decision for purposes of an appeal to Superior Court. The decision may then be appealed to Superior Court within a further 30 days in accordance with the rules of the court, and to the extent permitted by applicable law. An eligible person must first request reconsideration of this decision in accordance with 11 AAC 02 before appealing this decision to Superior Court. A copy of 11 AAC 02 may be obtained from any regional information office of the Department of Natural Resources.

Special Stipulations:

A. Activity for the term of this authorization is restricted to the following:

1. Up to 61 geotechnical boreholes as described in A20186118;
2. Up to 19 diamond core drill holes as described in A20186118;
3. Continued repair, reclamation, and general site maintenance;
4. On-going data collection and monitoring, including that of the Acid Rock Drainage (ARD) Test site; and
5. Any other repair, reclamation, maintenance or stabilization activity as ordered by DNR.

B. Action Requirements on Inspection Reports

Complete and report any outstanding work requirements identified in any Department inspection report by the date specified in the inspection report for completion.

C. Amendment Applications

Any modification request will be public noticed for at least 14 days.

Any additional boreholes or drill holes beyond those described in Special Stipulation A above will require a permit amendment and 30-day public notice period. Any such activity modification requests must be submitted no later than 60 days prior to the proposed commencement of such activities.

D. Mineral Closing Order 393

No work is proposed or authorized within Mineral Closing Order 393 under this permit.

E. Upper Talarik Creek Vegetative Buffer

Within Region 10, Subunit 01 as described in the Bristol Bay Area Plan (BBAP), disturbance of vegetation shall be restricted within 150' of the ordinary high-water mark of Upper Talarik Creek. No structures are authorized within 150 feet of Upper Talarik Creek.

F. Caribou Calving Areas

Operations must avoid caribou calving areas (if present) unless alternative mitigation measures to minimize disturbance are authorized by the Department of Natural Resources after consultation with the Department of Fish and Game. Prior to commencing seasonal work, you are required to coordinate with the above agencies to establish best management practices.

G. Moose Calving, Rutting, and Overwintering Areas

Prior to commencing seasonal work, you are required to coordinate with the Department of Fish and Game, Habitat Division to establish best management practices for acoustical disturbances to moose calving, rutting, and overwintering areas.

H. Bear Denning

Operations must avoid occupied bear dens by 1/2 mile unless alternative mitigation measures to minimize disturbance are authorized by the Department of Natural Resources after consultation with the Department of Fish and Game (Kate Harper, 907-267-2261). Occupied dens encountered in the field must be reported to the above contact and subsequently avoided.

I. Waterfowl Molting Area

The central portion of BBAP Subunit 10-03 is important to waterfowl molting, specifically, Tundra Swans (*Cygnus columbianus columbianus*). If activity is planned in this subunit, coordinate with the Department of Fish and Game to minimize impacts to the maximum extent practicable prior to commencement of the activity.

J. Drilling Waste and Cuttings Management:

1. Drilling mud and cuttings shall not be discharged into lakes, kettle ponds, streams, rivers, or wetlands.
2. Recirculation tanks or in-ground sumps to contain drilling mud, cuttings and discharged water from the drilling process must be used at any site utilizing water to aid in the drilling activity. Acceptable techniques include dug sumps, tanks and other settling or filtration devices designed specifically for cuttings management and previously approved by DNR.
3. Drill cuttings and additives in sumps must be allowed to sufficiently settle out of the drill water prior to backfilling the sump.
4. Settled drilling mud and all drill cuttings shall be sufficiently buried and graded to reasonably prevent oxidation.

K. Fire Prevention, Protection, and Liability:

1. The applicant shall take all reasonable precautions to prevent and suppress forest, brush, and grass fires and shall assume full liability for any damages to state land resulting from the negligent use of fire.
2. The State of Alaska is not liable for damage to the applicant's personal property and is not responsible for forest fire protection of the applicant's activity.

L. Annual Exploration / Reclamation Report:

You are required to file an Annual Exploration Report and Reclamation Statement by December 31st; please ensure that your report contains the following information:

- A written narrative describing your activities and the reclamation measures utilized at all disturbances.
- A written narrative describing repair work or abandonment measures taken for the preceding year.
- A topographic map showing the portion of the claim block where surface disturbing activities have occurred. The plan map should be at a scale of 1"=1/2 mile, or other appropriate scale sufficient to illustrate: existing trails and roads; new trails and roads; drill hole locations (other than shallow auger holes); trench locations; the camp location; and, any other surface disturbances (please distinguish between reclaimed and unreclaimed features).
- A photo, with appropriate caption, of each reclaimed drill site and exploration trench.
- A photo of representative sections of any new road or trail construction.
- A detailed description of the methods used to plug the drill holes.
- A list of Mining Claims by ADL# that contain unreclaimed disturbance at the end of the year and a total acreage that remains unreclaimed.
- The number of days of operation.

M. Water Use:

In any fish bearing waters, each water intake structure shall be centered and enclosed in a screened box designed to prevent fish entrapment, entrainment, or injury. The effective screen opening may not exceed ¼ inch. To reduce fish impingement on screened surfaces, water velocity at the screen/water interface may not exceed 0.5 feet per second when the pump is operating.

Commencement of permitted activities deems an acceptance of these stipulations.

Attachments: Appendix 1 – Mining Claim List

MLUP A20186118: Appendix 1

Mineral Claims			
Pebble East Claims Corp. 3201 C Street, Suite 602 Anchorage, AK 99503			
ADL No.	Claim Name	MTRS	Total Acres
ADL 552871	SOUTH PEBBLE 113	S005S036W08	160
ADL 552872	SOUTH PEBBLE 114	S005S036W08	160
ADL 552873	SOUTH PEBBLE 115	S005S036W09	160
ADL 552874	SOUTH PEBBLE 116	S005S036W16	160
ADL 552875	SOUTH PEBBLE 117	S005S036W16	160
ADL 552876	SOUTH PEBBLE 118	S005S036W17	160
ADL 552877	SOUTH PEBBLE 119	S005S036W17	160
ADL 552878	SOUTH PEBBLE 120	S005S036W18	160
ADL 552879	SOUTH PEBBLE 121	S005S036W18	160
ADL 552880	SOUTH PEBBLE 122	S005S036W18	160
ADL 552881	SOUTH PEBBLE 123	S005S036W18	160
ADL 552882	SOUTH PEBBLE 124	S005S036W17	160
ADL 552883	SOUTH PEBBLE 125	S005S036W17	160
ADL 552884	SOUTH PEBBLE 126	S005S036W16	160
ADL 552885	SOUTH PEBBLE 127	S005S036W16	160
ADL 552909	SOUTH PEBBLE 151	S005S036W25	160
ADL 552911	SOUTH PEBBLE 153	S005S036W24	160
ADL 552912	SOUTH PEBBLE 154	S005S036W24	160
ADL 552913	SOUTH PEBBLE 155	S005S036W24	160
ADL 552914	SOUTH PEBBLE 156	S005S036W24	160
ADL 552915	SOUTH PEBBLE 157	S005S036W13	160
ADL 552916	SOUTH PEBBLE 158	S005S036W13	160
ADL 552931	KAK 1	S004S037W12	160
ADL 552932	KAK 2	S004S037W12	160
ADL 552933	KAK 3	S004S037W11	160
ADL 552934	KAK 4	S004S037W11	160
ADL 552935	KAK 5	S004S037W11	160
ADL 552936	KAK 6	S004S037W11	160
ADL 552937	KAK 7	S004S037W12	160
ADL 552938	KAK 8	S004S037W12	160
ADL 552939	KAK 9	S004S037W01	160
ADL 552940	KAK 10	S004S037W01	160
ADL 552941	KAK 11	S004S037W02	160
ADL 552942	KAK 12	S004S037W02	160
ADL 552943	KAK 13	S004S037W03	160
ADL 552944	KAK 14	S004S037W03	160
ADL 552945	KAK 15	S004S037W03	160
ADL 552946	KAK 16	S004S037W03	160
ADL 552947	KAK 17	S004S037W02	160
ADL 552948	KAK 18	S004S037W02	160
ADL 552949	KAK 19	S004S037W01	160
ADL 552950	KAK 20	S004S037W01	160
ADL 552951	KAK 21	S003S036W31	160
ADL 552952	KAK 22	S003S036W31	160
ADL 552953	KAK 23	S003S037W36	160
ADL 552954	KAK 24	S003S037W36	160
ADL 552955	KAK 25	S003S037W35	160
ADL 552956	KAK 26	S003S037W35	160
ADL 552957	KAK 27	S003S037W34	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 552958	KAK 28	S003S037W34	160
ADL 552959	KAK 29	S003S037W34	160
ADL 552960	KAK 30	S003S037W34	160
ADL 552961	KAK 31	S003S037W35	160
ADL 552962	KAK 32	S003S037W35	160
ADL 552963	KAK 33	S003S037W36	160
ADL 552964	KAK 34	S003S037W36	160
ADL 552965	KAK 35	S003S036W31	160
ADL 552966	KAK 36	S003S036W31	160
ADL 552967	KAK 37	S003S036W30	160
ADL 552968	KAK 38	S003S036W30	160
ADL 552969	KAK 39	S003S037W25	160
ADL 552970	KAK 40	S003S037W25	160
ADL 552971	KAK 41	S003S037W26	160
ADL 552972	KAK 42	S003S037W26	160
ADL 552973	KAK 43	S003S037W27	160
ADL 552974	KAK 44	S003S037W27	160
ADL 552975	KAK 45	S003S037W27	160
ADL 552976	KAK 46	S003S037W27	160
ADL 552977	KAK 47	S003S037W26	160
ADL 552978	KAK 48	S003S037W26	160
ADL 552979	KAK 49	S003S037W25	160
ADL 552980	KAK 50	S003S037W25	160
ADL 552981	KAK 51	S003S036W30	160
ADL 552982	KAK 52	S003S036W30	160
ADL 552983	KAK 53	S003S036W19	160
ADL 552984	KAK 54	S003S036W19	160
ADL 552985	KAK 55	S003S037W24	160
ADL 552986	KAK 56	S003S037W24	160
ADL 552987	KAK 57	S003S037W23	160
ADL 552988	KAK 58	S003S037W23	160
ADL 552989	KAK 59	S003S037W22	160
ADL 552990	KAK 60	S003S037W24	160
ADL 552991	KAK 61	S003S037W24	160
ADL 552992	KAK 62	S003S036W19	160
ADL 552993	KAK 63	S003S036W19	160
ADL 552994	KAK 64	S003S036W18	160
ADL 552995	KAK 65	S003S036W18	160
ADL 552996	KAK 66	S003S037W13	160
ADL 552997	KAK 67	S003S037W13	160
ADL 552998	KAK 68	S003S036W18	160
ADL 552999	KAK 69	S003S036W18	160
ADL 553000	KAK 70	S003S036W17	160
ADL 553001	KAK 71	S003S036W17	160
ADL 553002	KAK 72	S003S036W10	160
ADL 553003	KAK 73	S003S036W10	160
ADL 553004	KAK 74	S003S036W09	160
ADL 553005	KAK 75	S003S036W09	160
ADL 553006	KAK 76	S003S036W08	160
ADL 553007	KAK 77	S003S036W08	160
ADL 553008	KAK 78	S003S036W07	160
ADL 553009	KAK 79	S003S036W07	160
ADL 553010	KAK 80	S003S037W12	160
ADL 553011	KAK 81	S003S037W12	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 553012	KAK 82	S003S036W07	160
ADL 553013	KAK 83	S003S036W07	160
ADL 553014	KAK 84	S003S036W08	160
ADL 553015	KAK 85	S003S036W08	160
ADL 553016	KAK 86	S003S036W09	160
ADL 553017	KAK 87	S003S036W09	160
ADL 553018	KAK 88	S003S036W10	160
ADL 553019	KAK 89	S003S036W10	160
ADL 553427	PEBA 1	S003S033W19	160
ADL 553428	PEBA 2	S003S033W19	160
ADL 553429	PEBA 3	S003S033W20	160
ADL 553437	PEBA 11	S003S033W19	160
ADL 553438	PEBA 12	S003S033W19	160
ADL 553439	PEBA 13	S003S033W20	160
ADL 553447	PEBA 21	S003S033W30	160
ADL 553448	PEBA 22	S003S033W30	160
ADL 553449	PEBA 23	S003S033W29	160
ADL 553457	PEBA 31	S003S033W30	160
ADL 553458	PEBA 32	S003S033W30	160
ADL 553459	PEBA 33	S003S033W29	160
ADL 553467	PEBA 41	S003S034W35	160
ADL 553468	PEBA 42	S003S034W36	160
ADL 553469	PEBA 43	S003S034W36	160
ADL 553470	PEBA 44	S003S033W31	160
ADL 553471	PEBA 45	S003S033W31	160
ADL 553472	PEBA 46	S003S033W32	160
ADL 553478	PEBA 52	S003S034W35	160
ADL 553479	PEBA 53	S003S034W36	160
ADL 553480	PEBA 54	S003S034W36	160
ADL 553481	PEBA 55	S003S033W31	160
ADL 553482	PEBA 56	S003S033W32	160
ADL 553488	PEBA 62	S004S034W02	160
ADL 553489	PEBA 63	S004S034W02	160
ADL 553490	PEBA 64	S004S034W01	160
ADL 553491	PEBA 65	S004S034W01	160
ADL 553492	PEBA 66	S004S033W06	160
ADL 553493	PEBA 67	S004S033W06	160
ADL 553494	PEBA 68	S004S033W05	160
ADL 553500	PEBA 74	S004S034W05	160
ADL 553501	PEBA 75	S004S034W04	160
ADL 553502	PEBA 76	S004S034W04	160
ADL 553503	PEBA 77	S004S034W03	160
ADL 553504	PEBA 78	S004S034W03	160
ADL 553505	PEBA 79	S004S034W02	160
ADL 553506	PEBA 80	S004S034W02	160
ADL 553507	PEBA 81	S004S034W01	160
ADL 553508	PEBA 82	S004S034W01	160
ADL 553509	PEBA 83	S004S033W06	160
ADL 553510	PEBA 84	S004S033W06	160
ADL 553511	PEBA 85	S004S033W05	160
ADL 553517	PEBA 91	S004S034W08	160
ADL 553518	PEBA 92	S004S034W09	160
ADL 553519	PEBA 93	S004S034W09	160
ADL 553520	PEBA 94	S004S034W10	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 553521	PEBA 95	S004S034W10	160
ADL 553522	PEBA 96	S004S034W08	160
ADL 553523	PEBA 97	S004S034W09	160
ADL 553524	PEBA 98	S004S034W09	160
ADL 553525	PEBA 99	S004S034W10	160
ADL 553526	PEBA 100	S004S034W10	160
ADL 553527	PEBA 101	S004S034W17	160
ADL 553528	PEBA 102	S004S034W17	160
ADL 553529	PEBA 103	S004S034W16	160
ADL 553530	PEBA 104	S004S034W16	160
ADL 553531	PEBA 105	S004S034W15	160
ADL 553532	PEBA 106	S004S034W15	160
ADL 553533	PEBA 107	S004S034W17	160
ADL 553534	PEBA 108	S004S034W17	160
ADL 553535	PEBA 109	S004S034W16	160
ADL 553536	PEBA 110	S004S034W16	160
ADL 553537	PEBA 111	S004S034W15	160
ADL 553538	PEBA 112	S004S034W15	160
ADL 553539	PEBB 1	S003S036W16	160
ADL 553540	PEBB 2	S003S036W16	160
ADL 553541	PEBB 3	S003S036W15	160
ADL 553542	PEBB 4	S003S036W15	160
ADL 553543	PEBB 5	S003S036W17	160
ADL 553544	PEBB 6	S003S036W17	160
ADL 553545	PEBB 7	S003S036W16	160
ADL 553546	PEBB 8	S003S036W16	160
ADL 553547	PEBB 9	S003S036W20	160
ADL 553548	PEBB 10	S003S036W20	160
ADL 553549	PEBB 11	S003S036W21	160
ADL 553550	PEBB 12	S003S036W21	160
ADL 553551	PEBB 13	S003S036W20	160
ADL 553552	PEBB 14	S003S036W20	160
ADL 553553	PEBB 15	S003S036W21	160
ADL 553554	PEBB 16	S003S036W29	160
ADL 553555	PEBB 17	S003S036W29	160
ADL 553556	PEBB 18	S003S036W29	160
ADL 553557	PEBB 19	S003S036W29	160
ADL 553558	PEBB 20	S003S036W32	160
ADL 553559	PEBB 21	S003S036W32	160
ADL 553560	PEBB 22	S003S036W32	160
ADL 553561	PEBB 23	S003S036W32	160
ADL 553562	PEBB 24	S004S036W06	160
ADL 553563	PEBB 25	S004S036W06	160
ADL 553564	PEBB 26	S004S036W05	160
ADL 553565	PEBB 27	S004S036W05	160
ADL 553566	PEBB 28	S004S036W06	160
ADL 553567	PEBB 29	S004S036W06	160
ADL 553568	PEBB 30	S004S036W05	160
ADL 553569	PEBB 31	S004S036W05	160
ADL 553570	PEBB 32	S004S036W07	160
ADL 553571	PEBB 33	S004S036W07	160
ADL 553572	PEBB 34	S004S036W08	160
ADL 553573	PEBB 35	S004S036W08	160
ADL 553574	PEBB 36	S004S036W07	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 553575	PEBB 37	S004S036W07	160
ADL 553576	PEBB 38	S004S036W08	160
ADL 553577	PEBB 39	S004S036W08	160
ADL 553578	PEBE 1	S002S037W25	160
ADL 553579	PEBE 2	S002S037W25	160
ADL 553580	PEBE 3	S002S037W26	160
ADL 553581	PEBE 4	S002S037W25	160
ADL 553582	PEBE 5	S002S037W25	160
ADL 553583	PEBE 6	S002S037W35	160
ADL 553584	PEBE 7	S002S037W36	160
ADL 553585	PEBE 8	S002S037W36	160
ADL 553586	PEBE 9	S002S037W36	160
ADL 553587	PEBE 10	S002S037W36	160
ADL 553588	PEBF 1	S003S038W26	160
ADL 553589	PEBF 2	S003S038W26	160
ADL 553590	PEBF 3	S003S038W25	160
ADL 553591	PEBF 4	S003S038W25	160
ADL 553592	PEBF 5	S003S037W30	160
ADL 553593	PEBF 6	S003S037W30	160
ADL 553594	PEBF 7	S003S038W26	160
ADL 553595	PEBF 8	S003S038W26	160
ADL 553596	PEBF 9	S003S038W25	160
ADL 553597	PEBF 10	S003S038W25	160
ADL 553598	PEBF 11	S003S037W30	160
ADL 553599	PEBF 12	S003S037W30	160
ADL 553600	PEBF 13	S003S037W29	160
ADL 553601	PEBF 14	S003S038W35	160
ADL 553602	PEBF 15	S003S038W35	160
ADL 553603	PEBF 16	S003S038W36	160
ADL 553604	PEBF 17	S003S038W36	160
ADL 553605	PEBF 18	S003S037W31	160
ADL 553606	PEBF 19	S003S037W31	160
ADL 553607	PEBF 20	S003S037W32	160
ADL 553608	PEBF 21	S003S038W35	160
ADL 553609	PEBF 22	S003S038W35	160
ADL 553610	PEBF 23	S003S038W36	160
ADL 553611	PEBF 24	S003S038W36	160
ADL 553612	PEBF 25	S003S037W31	160
ADL 553613	PEBF 26	S003S037W31	160
ADL 553614	PEBF 27	S003S037W32	160
ADL 553615	SILL 6155	S004S034W07	40
ADL 553616	SILL 6156	S004S034W07	40
ADL 553617	SILL 6256	S004S034W07	40
ADL 638779	PEB 1	S004S036W22	160
ADL 638780	PEB 2	S004S036W22	160
ADL 638781	PEB 3	S004S036W23	160
ADL 638782	PEB 4	S004S036W23	160
ADL 638783	PEB 5	S004S036W22	160
ADL 638784	PEB 6	S004S036W22	160
ADL 638785	PEB 7	S004S036W23	160
ADL 638786	PEB 8	S004S036W23	160
ADL 638791	PEB 13	S004S037W25	160
ADL 638792	PEB 14	S004S036W30	160
ADL 638793	PEB 15	S004S036W30	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 638794	PEB 16	S004S036W29	160
ADL 638795	PEB 17	S004S036W29	160
ADL 638796	PEB 18	S004S036W28	160
ADL 638797	PEB 19	S004S036W28	160
ADL 638798	PEB 20	S004S036W27	160
ADL 638799	PEB 21	S004S036W27	160
ADL 638800	PEB 22	S004S036W26	160
ADL 638801	PEB 23	S004S036W26	40
ADL 638802	PEB 24	S004S036W26	40
ADL 638807	PEB 29	S004S037W25	160
ADL 638808	PEB 30	S004S036W30	160
ADL 638809	PEB 31	S004S036W30	160
ADL 638810	PEB 32	S004S036W29	160
ADL 638811	PEB 33	S004S036W29	160
ADL 638812	PEB 34	S004S036W28	160
ADL 638813	PEB 35	S004S036W28	160
ADL 638814	PEB 36	S004S036W27	160
ADL 638815	PEB 37	S004S036W27	160
ADL 638816	PEB 38	S004S036W26	160
ADL 638821	PEB 43	S004S037W36	160
ADL 638822	PEB 44	S004S036W31	160
ADL 638823	PEB 45	S004S036W31	160
ADL 638824	PEB 46	S004S036W32	160
ADL 638825	PEB 47	S004S036W32	160
ADL 638826	PEB 48	S004S036W33	160
ADL 638827	PEB 49	S004S036W33	160
ADL 638828	PEB 50	S004S036W34	160
ADL 638829	PEB 51	S004S036W34	160
ADL 638830	PEB 52	S004S036W35	160
ADL 638835	PEB 57	S004S037W36	160
ADL 638836	PEB 58	S004S036W31	160
ADL 638837	PEB 59	S004S036W31	160
ADL 638838	PEB 60	S004S036W32	160
ADL 638839	PEB 61	S004S036W32	160
ADL 638840	PEB 62	S004S036W33	160
ADL 638841	PEB 63	S004S036W33	160
ADL 638842	PEB 64	S004S036W34	160
ADL 638843	PEB 65	S004S036W34	160
ADL 638844	PEB 66	S004S036W35	160
ADL 638848	PEB 70	S005S037W03	160
ADL 638849	PEB 71	S005S037W03	160
ADL 638850	PEB 72	S005S037W02	160
ADL 638851	PEB 73	S005S037W02	160
ADL 638852	PEB 74	S005S037W01	160
ADL 638853	PEB 75	S005S037W01	160
ADL 638854	PEB 76	S005S036W06	160
ADL 638855	PEB 77	S005S036W06	160
ADL 638856	PEB 78	S005S036W05	160
ADL 638857	PEB 79	S005S036W05	160
ADL 638858	PEB 80	S005S036W04	160
ADL 638862	PEB 84	S005S037W03	160
ADL 638863	PEB 85	S005S037W03	160
ADL 638864	PEB 86	S005S037W02	160
ADL 638865	PEB 87	S005S037W02	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 638866	PEB 88	S005S037W01	160
ADL 638867	PEB 89	S005S037W01	160
ADL 638868	PEB 90	S005S036W06	160
ADL 638869	PEB 91	S005S036W06	160
ADL 638870	PEB 92	S005S036W05	160
ADL 638871	PEB 93	S005S036W05	160
ADL 638872	PEB 94	S005S036W04	160
ADL 638873	PEB 95	S005S036W04	40
ADL 638874	PEB 96	S005S036W04	40
ADL 638875	PEB 97	S005S036W03	40
ADL 638882	PEB 104	S005S037W10	160
ADL 638883	PEB 105	S005S037W10	160
ADL 638884	PEB 106	S005S037W11	160
ADL 638885	PEB 107	S005S037W11	160
ADL 638886	PEB 108	S005S037W12	160
ADL 638887	PEB 109	S005S037W12	160
ADL 638888	PEB 110	S005S036W07	160
ADL 638889	PEB 111	S005S036W07	160
ADL 638890	PEB 112	S005S036W08	160
ADL 638891	PEB 113	S005S036W08	160
ADL 638892	PEB 114	S005S036W09	160
ADL 638893	PEB 115	S005S036W09	160
ADL 640061	PEB N-1	S004S037W24	160
ADL 640062	PEB N-2	S004S036W19	160
ADL 640063	PEB N-3	S004S036W19	160
ADL 640064	PEB N-4	S004S036W20	160
ADL 640065	PEB N-5	S004S036W20	160
ADL 640066	PEB N-6	S004S036W21	160
ADL 640067	PEB N-7	S004S036W21	160
ADL 640068	PEB N-8	S004S037W24	160
ADL 640069	PEB N-9	S004S036W19	160
ADL 640070	PEB N-10	S004S036W19	160
ADL 640071	PEB N-11	S004S036W20	160
ADL 640072	PEB N-12	S004S036W20	160
ADL 640073	PEB N-13	S004S036W21	160
ADL 640074	PEB N-14	S004S036W21	160
ADL 640075	PEB N-15	S004S037W13	160
ADL 640076	PEB N-16	S004S036W18	160
ADL 640077	PEB N-17	S004S036W18	160
ADL 640078	PEB N-18	S004S036W17	160
ADL 640079	PEB N-19	S004S036W17	160
ADL 640080	PEB N-20	S004S036W16	160
ADL 640081	PEB N-21	S004S036W16	160
ADL 640082	PEB N-22	S004S036W15	160
ADL 640083	PEB N-23	S004S036W15	160
ADL 640084	PEB N-24	S004S036W14	160
ADL 640085	PEB N-25	S004S036W14	160
ADL 640086	PEB N-26	S004S037W13	160
ADL 640087	PEB N-27	S004S036W18	160
ADL 640088	PEB N-28	S004S036W18	160
ADL 640089	PEB N-29	S004S036W17	160
ADL 640090	PEB N-30	S004S036W17	160
ADL 640091	PEB N-31	S004S036W16	160
ADL 640092	PEB N-32	S004S036W16	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 640093	PEB N-33	S004S036W15	160
ADL 640094	PEB N-34	S004S036W15	160
ADL 640095	PEB N-35	S004S036W14	160
ADL 640096	PEB N-36	S004S036W14	160
ADL 642027	SOUTH PEBBLE 71	S005S037W23	160
ADL 642028	SOUTH PEBBLE 72	S005S037W23	160
ADL 642029	SOUTH PEBBLE 73	S005S037W23	160
ADL 642035	SOUTH PEBBLE 79	S005S036W23	160
ADL 642036	SOUTH PEBBLE 80	S005S036W14	160
ADL 642037	SOUTH PEBBLE 81	S005S036W14	160
ADL 642038	SOUTH PEBBLE 82	S005S036W15	160
ADL 642039	SOUTH PEBBLE 83	S005S036W15	160
ADL 642040	SOUTH PEBBLE 84	S005S037W13	160
ADL 642041	SOUTH PEBBLE 85	S005S037W13	160
ADL 642042	SOUTH PEBBLE 86	S005S037W14	160
ADL 642043	SOUTH PEBBLE 87	S005S037W14	160
ADL 642044	SOUTH PEBBLE 88	S005S037W15	160
ADL 642045	SOUTH PEBBLE 89	S005S037W15	160
ADL 642046	SOUTH PEBBLE 90	S005S037W15	160
ADL 642047	SOUTH PEBBLE 91	S005S037W15	160
ADL 642048	SOUTH PEBBLE 92	S005S037W14	160
ADL 642049	SOUTH PEBBLE 93	S005S037W14	160
ADL 642050	SOUTH PEBBLE 94	S005S037W13	160
ADL 642051	SOUTH PEBBLE 95	S005S037W13	160
ADL 642052	SOUTH PEBBLE 96	S005S036W15	160
ADL 642053	SOUTH PEBBLE 97	S005S036W15	160
ADL 642054	SOUTH PEBBLE 98	S005S036W14	160
ADL 642055	SOUTH PEBBLE 99	S005S036W14	160
ADL 642056	SOUTH PEBBLE 100	S005S036W11	160
ADL 642057	SOUTH PEBBLE 101	S005S036W11	160
ADL 642058	SOUTH PEBBLE 102	S005S036W10	160
ADL 642059	SOUTH PEBBLE 103	S005S036W10	160
ADL 642060	SOUTH PEBBLE 104	S005S036W09	160
ADL 642061	SOUTH PEBBLE 105	S005S036W07	160
ADL 642062	SOUTH PEBBLE 106	S005S036W07	160
ADL 642063	SOUTH PEBBLE 107	S005S037W12	160
ADL 642064	SOUTH PEBBLE 108	S005S037W12	160
ADL 642065	SOUTH PEBBLE 109	S005S037W11	160
ADL 642066	SOUTH PEBBLE 110	S005S037W11	160
ADL 642067	SOUTH PEBBLE 111	S005S037W10	160
ADL 642068	SOUTH PEBBLE 112	S005S037W10	160
ADL 642334	PEB EBA 1	S004S035W02	40
ADL 642335	PEB EBA 2	S004S035W02	40
ADL 642336	PEB EBA 3	S004S035W02	40
ADL 642337	PEB EBA 4	S004S035W02	40
ADL 642338	PEB EB 1	S003S035W35	160
ADL 642339	PEB EB 2	S003S035W35	160
ADL 642340	PEB EB 3	S003S035W35	160
ADL 642341	PEB EB 4	S003S035W35	160
ADL 642342	PEB EB 5	S003S034W31	160
ADL 642343	PEB EB 6	S003S034W31	160
ADL 642344	PEB EB 7	S003S034W32	160
ADL 642345	PEB EB 8	S003S034W32	160
ADL 642346	PEB EB 9	S003S034W33	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 642347	PEB EB 10	S003S034W33	160
ADL 642348	PEB EB 11	S003S034W31	160
ADL 642349	PEB EB 12	S003S034W31	160
ADL 642350	PEB EB 13	S003S034W32	160
ADL 642351	PEB EB 14	S003S034W32	160
ADL 642352	PEB EB 15	S003S034W33	160
ADL 642353	PEB EB 16	S003S034W33	160
ADL 642354	PEB EB 17	S003S035W26	160
ADL 642355	PEB EB 18	S003S035W26	160
ADL 642356	PEB EB 19	S003S035W25	160
ADL 642357	PEB EB 20	S003S035W25	160
ADL 642358	PEB EB 21	S003S034W30	160
ADL 642359	PEB EB 22	S003S034W30	160
ADL 642360	PEB EB 23	S003S034W29	160
ADL 642361	PEB EB 24	S003S034W29	160
ADL 642362	PEB EB 25	S003S034W28	160
ADL 642363	PEB EB 26	S003S034W28	160
ADL 642364	PEB EB 27	S003S035W26	160
ADL 642365	PEB EB 28	S003S035W26	160
ADL 642366	PEB EB 29	S003S035W25	160
ADL 642367	PEB EB 30	S003S035W25	160
ADL 642368	PEB EB 31	S003S034W30	160
ADL 642369	PEB EB 32	S003S034W30	160
ADL 642370	PEB EB 33	S003S034W29	160
ADL 642371	PEB EB 34	S003S034W29	160
ADL 642372	PEB EB 35	S003S034W28	160
ADL 642373	PEB EB 36	S003S034W28	160
ADL 642374	PEB EB 37	S003S035W24	160
ADL 642375	PEB EB 38	S003S035W24	160
ADL 642376	PEB EB 39	S003S034W19	160
ADL 642377	PEB EB 40	S003S034W19	160
ADL 642378	PEB EB 41	S003S034W20	160
ADL 642379	PEB EB 42	S003S034W20	160
ADL 642380	PEB EB 43	S003S034W21	160
ADL 642381	PEB EB 44	S003S034W21	160
ADL 642382	PEB EB 45	S003S035W24	160
ADL 642383	PEB EB 46	S003S035W24	160
ADL 642384	PEB EB 47	S003S034W19	160
ADL 642385	PEB EB 48	S003S034W19	160
ADL 642386	PEB EB 49	S003S034W20	160
ADL 642387	PEB EB 50	S003S034W20	160
ADL 642388	PEB EB 51	S003S034W21	160
ADL 642389	PEB EB 52	S003S034W21	160
ADL 642390	PEB EB 53	S003S035W13	160
ADL 642391	PEB EB 54	S003S035W13	160
ADL 642392	PEB EB 55	S003S034W18	160
ADL 642393	PEB EB 56	S003S034W18	160
ADL 642394	PEB EB 57	S003S034W17	160
ADL 642395	PEB EB 58	S003S034W17	160
ADL 642396	PEB EB 59	S003S034W16	160
ADL 642397	PEB EB 60	S003S034W16	160
ADL 642398	PEB EB 61	S003S035W13	160
ADL 642399	PEB EB 62	S003S035W13	160
ADL 642400	PEB EB 63	S003S034W18	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 642401	PEB EB 64	S003S034W18	160
ADL 642402	PEB EB 65	S003S034W17	160
ADL 642403	PEB EB 66	S003S034W17	160
ADL 642404	PEB EB 67	S003S034W16	160
ADL 642405	PEB EB 68	S003S034W16	160
ADL 642406	PEB EB 69	S003S035W12	160
ADL 642407	PEB EB 70	S003S035W12	160
ADL 642408	PEB EB 71	S003S034W07	160
ADL 642409	PEB EB 72	S003S034W07	160
ADL 642410	PEB EB 73	S003S034W08	160
ADL 642411	PEB EB 74	S003S034W08	160
ADL 642412	PEB WB 1	S003S036W33	160
ADL 642413	PEB WB 2	S003S036W33	160
ADL 642414	PEB WB 3	S003S036W34	160
ADL 642415	PEB WB 4	S003S036W34	160
ADL 642416	PEB WB 5	S003S036W33	160
ADL 642417	PEB WB 6	S003S036W33	160
ADL 642418	PEB WB 7	S003S036W34	160
ADL 642419	PEB WB 8	S003S036W34	160
ADL 642420	PEB WB 9	S003S036W28	160
ADL 642421	PEB WB 10	S003S036W28	160
ADL 642422	PEB WB 11	S003S036W27	160
ADL 642423	PEB WB 12	S003S036W27	160
ADL 642424	PEB WB 13	S003S036W26	160
ADL 642425	PEB WB 14	S003S036W26	160
ADL 642426	PEB WB 15	S003S036W28	160
ADL 642427	PEB WB 16	S003S036W28	160
ADL 642428	PEB WB 17	S003S036W27	160
ADL 642429	PEB WB 18	S003S036W27	160
ADL 642430	PEB WB 19	S003S036W26	160
ADL 642431	PEB WB 20	S003S036W26	160
ADL 642432	PEB WB 21	S003S036W21	160
ADL 642433	PEB WB 22	S003S036W22	160
ADL 642434	PEB WB 23	S003S036W22	160
ADL 642435	PEB WB 24	S003S036W23	160
ADL 642436	PEB WB 25	S003S036W23	160
ADL 642437	PEB WB 26	S003S036W22	160
ADL 642438	PEB WB 27	S003S036W22	160
ADL 642439	PEB WB 28	S003S036W23	160
ADL 642440	PEB WB 29	S003S036W23	160
ADL 642441	PEB WB 30	S003S036W15	160
ADL 642442	PEB WB 31	S003S036W15	160
ADL 642443	PEB WB 32	S003S036W14	160
ADL 642444	PEB WB 33	S003S036W14	160
ADL 642445	PEB WB 34	S003S036W14	160
ADL 642446	PEB WB 35	S003S036W14	160
ADL 642447	PEB WB 36	S003S036W11	160
ADL 642448	PEB WB 37	S003S036W11	160
ADL 642449	PEB WB 38	S003S036W11	160
ADL 642450	PEB WB 39	S003S036W11	160
ADL 643892	PEB SE A1	S004S035W31	40
ADL 643893	PEB SE A2	S004S035W31	40
ADL 643894	PEB SE A3	S004S035W31	40
ADL 643895	PEB SE A4	S004S035W31	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 643896	PEB SE A5	S004S035W31	40
ADL 643897	PEB SE A6	S004S035W19	40
ADL 643898	PEB SE A7	S004S035W19	40
ADL 643899	PEB SE 1	S004S035W31	160
ADL 643900	PEB SE 2	S004S035W32	160
ADL 643901	PEB SE 3	S004S035W32	160
ADL 643902	PEB SE 4	S004S035W31	160
ADL 643903	PEB SE 5	S004S035W32	160
ADL 643904	PEB SE 6	S004S035W32	160
ADL 643905	PEB SE 7	S004S035W30	160
ADL 643906	PEB SE 8	S004S035W30	160
ADL 643907	PEB SE 9	S004S035W29	160
ADL 643908	PEB SE 10	S004S035W29	160
ADL 643909	PEB SE 11	S004S035W28	160
ADL 643910	PEB SE 12	S004S035W28	160
ADL 643911	PEB SE 13	S004S035W30	160
ADL 643912	PEB SE 14	S004S035W30	160
ADL 643913	PEB SE 15	S004S035W29	160
ADL 643914	PEB SE 16	S004S035W29	160
ADL 643915	PEB SE 17	S004S035W28	160
ADL 643916	PEB SE 18	S004S035W28	160
ADL 643917	PEB SE 19	S004S035W19	160
ADL 643918	PEB SE 20	S004S035W19	160
ADL 643919	PEB SE 21	S004S035W20	160
ADL 643920	PEB SE 22	S004S035W20	160
ADL 643921	PEB SE 23	S004S035W21	160
ADL 643922	PEB SE 24	S004S035W21	160
ADL 643923	PEB SE 25	S004S035W19	160
ADL 643924	PEB SE 26	S004S035W20	160
ADL 643925	PEB SE 27	S004S035W20	160
ADL 643926	PEB SE 28	S004S035W21	160
ADL 643927	PEB SE 29	S004S035W33	160
ADL 643928	PEB SE 30	S004S035W33	160
ADL 643929	PEB SE 31	S004S035W33	160
ADL 643930	PEB SE 32	S004S035W33	160
ADL 643931	PEB NW A1	S003S036W12	40
ADL 643932	PEB NW A2	S003S036W12	40
ADL 643933	PEB NW A3	S003S036W12	40
ADL 643934	PEB NW A4	S003S036W12	40
ADL 643935	PEB NW 1	S003S036W02	160
ADL 643936	PEB NW 2	S003S036W02	160
ADL 643937	PEB NW 3	S003S036W01	160
ADL 643938	PEB NW 4	S003S036W01	160
ADL 643939	PEB NW 5	S003S036W02	160
ADL 643940	PEB NW 6	S003S036W02	160
ADL 643941	PEB NW 7	S003S036W01	160
ADL 643942	PEB NW 8	S003S036W01	160
ADL 643943	PEB NW 9	S002S036W35	160
ADL 643944	PEB NW 10	S002S036W35	160
ADL 643945	PEB NW 11	S002S036W36	160
ADL 643946	PEB NW 12	S002S036W36	160
ADL 643947	PEB NW 13	S002S036W35	160
ADL 643948	PEB NW 14	S002S036W35	160
ADL 643949	PEB NW 15	S002S036W36	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 643950	PEB NW 16	S002S036W36	160
ADL 643951	PEB NW 17	S002S036W26	160
ADL 643952	PEB NW 18	S002S036W26	160
ADL 643953	PEB NW 19	S002S036W25	160
ADL 643954	PEB NW 20	S002S036W25	160
ADL 643955	PEB NW 21	S002S036W26	160
ADL 643956	PEB NW 22	S002S036W26	160
ADL 643957	PEB NW 23	S002S036W25	160
ADL 643958	PEB NW 24	S002S036W25	160
ADL 643959	PEB NW 25	S002S036W23	160
ADL 643960	PEB NW 26	S002S036W23	160
ADL 643961	PEB NW 27	S002S036W24	160
ADL 643962	PEB NW 28	S002S036W24	160
ADL 643963	PEB NW 29	S002S036W23	160
ADL 643964	PEB NW 30	S002S036W23	160
ADL 643965	PEB NW 31	S002S036W24	160
ADL 643966	PEB NW 32	S002S036W24	160
ADL 644196	PEB SE 33	S004S035W22	160
ADL 644197	PEB SE 34	S004S035W22	160
ADL 644198	PEB SE 35	S004S035W23	160
ADL 644199	PEB SE 36	S004S035W23	160
ADL 644200	PEB SE 37	S004S035W27	160
ADL 644201	PEB SE 38	S004S035W27	160
ADL 644202	PEB SE 39	S004S035W26	160
ADL 644203	PEB SE 40	S004S035W26	160
ADL 644204	PEB SE 41	S004S035W27	160
ADL 644205	PEB SE 42	S004S035W27	160
ADL 644206	PEB SE 43	S004S035W26	160
ADL 644207	PEB SE 44	S004S035W26	160
ADL 644208	PEB SE 45	S004S035W34	160
ADL 644209	PEB SE 46	S004S035W34	160
ADL 644210	PEB SE 47	S004S035W35	160
ADL 644211	PEB SE 48	S004S035W34	160
ADL 644212	PEB SE 49	S004S035W34	160
ADL 644213	PEB SE 50	S005S036W02	160
ADL 644214	PEB SE 51	S005S036W02	160
ADL 644215	PEB SE 52	S005S036W01	160
ADL 644216	PEB SE 53	S005S036W01	160
ADL 644217	PEB SE 54	S005S035W06	160
ADL 644218	PEB SE 55	S005S035W06	160
ADL 644219	PEB SE 56	S005S036W02	160
ADL 644220	PEB SE 57	S005S036W02	160
ADL 644221	PEB SE 58	S005S036W01	160
ADL 644222	PEB SE 59	S005S036W01	160
ADL 644223	PEB SE 60	S005S035W06	160
ADL 644224	PEB SE 61	S005S035W06	160
ADL 644225	PEB SE A8	S004S035W23	40
ADL 644226	PEB SE A9	S005S036W04	40
ADL 644227	PEB SE A10	S005S036W03	40
ADL 644228	PEB SE A11	S005S036W03	40
ADL 644229	PEB SE A12	S005S036W03	40
ADL 644230	PEB SE A13	S005S036W03	40
ADL 644231	PEB EB 75	S003S034W09	160
ADL 644232	PEB EB 76	S003S034W09	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 644233	PEB EB 77	S003S035W11	160
ADL 644234	PEB EB 78	S003S035W11	160
ADL 644235	PEB EB 79	S003S035W12	160
ADL 644236	PEB EB 80	S003S035W12	160
ADL 644237	PEB EB 81	S003S034W07	160
ADL 644238	PEB EB 82	S003S034W07	160
ADL 644239	PEB EB 83	S003S034W08	160
ADL 644240	PEB EB 84	S003S034W08	160
ADL 644241	PEB EB 85	S003S034W09	160
ADL 644242	PEB EB 86	S003S034W09	160
ADL 644243	PEB EB 87	S003S035W02	160
ADL 644244	PEB EB 88	S003S035W02	160
ADL 644245	PEB EB 89	S003S035W01	160
ADL 644246	PEB EB 90	S003S035W01	160
ADL 644247	PEB EB 91	S003S034W06	160
ADL 644248	PEB EB 92	S003S034W04	160
ADL 644249	PEB EB 93	S003S034W04	160
ADL 644250	PEB EB 94	S003S035W02	160
ADL 644251	PEB EB 95	S003S035W02	160
ADL 644252	PEB EB A5	S003S035W11	40
ADL 644253	PEB EB A6	S003S035W11	40
ADL 644254	PEB EB A7	S003S035W11	40
ADL 644255	PEB EB A8	S003S035W11	40
ADL 644256	PEB WB 40	S004S036W04	160
ADL 644257	PEB WB 41	S004S036W04	160
ADL 644258	PEB WB 42	S004S036W03	160
ADL 644259	PEB WB 43	S004S036W03	160
ADL 644260	PEB WB 44	S004S036W02	160
ADL 644261	PEB WB 45	S004S036W02	160
ADL 644262	PEB WB 46	S004S036W04	160
ADL 644263	PEB WB 47	S004S036W04	160
ADL 644264	PEB WB 48	S004S036W03	160
ADL 644265	PEB WB 49	S004S036W03	160
ADL 644266	PEB WB 50	S004S036W02	160
ADL 644267	PEB WB 51	S004S036W02	160
ADL 644268	PEB WB 52	S004S036W09	160
ADL 644269	PEB WB 53	S004S036W09	160
ADL 644270	PEB WB 54	S004S036W10	160
ADL 644271	PEB WB 55	S004S036W10	160
ADL 644272	PEB WB 56	S004S036W11	160
ADL 644273	PEB WB 57	S004S036W11	160
ADL 644274	PEB WB 58	S004S036W09	160
ADL 644275	PEB WB 59	S004S036W09	160
ADL 644276	PEB WB 60	S004S036W10	160
ADL 644277	PEB WB 61	S004S036W10	160
ADL 644278	PEB WB 62	S004S036W11	160
ADL 644279	PEB WB 63	S004S036W11	160
ADL 644304	SP 193	S005S036W12	160
ADL 644305	SP 194	S005S036W12	160
ADL 644306	SP 195	S005S036W11	160
ADL 644307	SP 196	S005S036W11	160
ADL 644308	SP 197	S005S036W10	160
ADL 644309	SP 198	S005S036W10	160
ADL 644310	SP 199	S005S036W12	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 644311	SP 200	S005S036W12	160
ADL 644316	SP 205	S005S036W13	160
ADL 644317	SP 206	S005S036W13	160
ADL 644371	SP 280	S005S037W28	160
ADL 644374	SP 283	S005S037W22	160
ADL 644375	SP 284	S005S037W22	160
ADL 644376	SP 285	S005S037W21	160
ADL 644377	SP 286	S005S037W21	160
ADL 644378	SP 287	S005S037W21	160
ADL 644379	SP 288	S005S037W21	160
ADL 644380	SP 289	S005S037W22	160
ADL 644381	SP 290	S005S037W22	160
ADL 644382	SP 291	S005S037W16	160
ADL 644383	SP 292	S005S037W16	160
ADL 644384	SP 293	S005S037W16	160
ADL 644385	SP 294	S005S037W16	160
ADL 644386	KAK 90	S003S037W33	160
ADL 644387	KAK 91	S003S037W33	160
ADL 644388	KAK 92	S003S037W32	160
ADL 644389	KAK 93	S003S037W32	160
ADL 644390	KAK 94	S003S037W33	160
ADL 644391	KAK 95	S003S037W33	160
ADL 644392	KAK 96	S003S037W28	160
ADL 644393	KAK 97	S003S037W28	160
ADL 644394	KAK 98	S003S037W29	160
ADL 644395	KAK 99	S003S037W29	160
ADL 644396	KAK 100	S003S037W28	160
ADL 644397	KAK 101	S003S037W28	160
ADL 644398	KAK 102	S003S037W22	160
ADL 644399	KAK 103	S003S037W21	160
ADL 644400	KAK 104	S003S037W21	160
ADL 644401	KAK 105	S003S037W20	160
ADL 644402	KAK 106	S003S036W05	160
ADL 644403	KAK 107	S003S036W05	160
ADL 644404	KAK 108	S003S036W06	160
ADL 644405	KAK 109	S003S036W06	160
ADL 644406	KAK 110	S003S037W01	160
ADL 644407	KAK 111	S003S037W01	160
ADL 644408	KAK 112	S003S036W06	160
ADL 644409	KAK 113	S003S036W06	160
ADL 644410	KAK 114	S003S036W05	160
ADL 644411	KAK 115	S003S036W05	160
ADL 644412	KAK 116	S002S036W32	160
ADL 644413	KAK 117	S002S036W32	160
ADL 644414	KAK 118	S002S036W31	160
ADL 644415	KAK 119	S002S036W31	160
ADL 644421	KAK 125	S002S036W31	160
ADL 644422	KAK 126	S002S036W31	160
ADL 644423	KAK 127	S002S036W32	160
ADL 644424	KAK 128	S002S036W29	160
ADL 644425	KAK 129	S002S036W30	160
ADL 644426	KAK 130	S002S036W30	160
ADL 644467	KAK 171	S002S036W28	160
ADL 644468	KAK 172	S002S036W29	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 644469	KAK 173	S002S036W32	160
ADL 644470	KAK 174	S002S036W33	160
ADL 644471	KAK 175	S002S036W33	160
ADL 644472	KAK 176	S002S036W34	160
ADL 644473	KAK 177	S002S036W34	160
ADL 644474	KAK 178	S002S036W33	160
ADL 644475	KAK 179	S002S036W33	160
ADL 644476	KAK 180	S003S036W04	160
ADL 644477	KAK 181	S003S036W04	160
ADL 644478	KAK 182	S003S036W03	160
ADL 644479	KAK 183	S003S036W03	160
ADL 644480	KAK 184	S003S036W03	160
ADL 644481	KAK 185	S003S036W03	160
ADL 644482	KAK 186	S003S036W04	160
ADL 644483	KAK 187	S003S036W04	160
ADL 644881	KAK 188	S002S036W34	160
ADL 644882	KAK 189	S002S036W34	160
ADL 644883	KAK 190	S002S036W28	160
ADL 644884	KAK 191	S002S036W27	160
ADL 644885	KAK 192	S002S036W27	160
ADL 644886	KAK 193	S002S036W27	160
ADL 644887	KAK 194	S002S036W27	160
ADL 644888	KAK 195	S002S036W28	160
ADL 644889	KAK 196	S002S036W21	160
ADL 644890	KAK 197	S002S036W21	160
ADL 644891	KAK 198	S002S036W22	160
ADL 644892	KAK 199	S002S036W22	160
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ADL 644894	KAK 201	S002S036W22	160
ADL 644895	KAK 202	S002S036W21	160
ADL 644896	KAK 203	S002S036W21	160
ADL 644897	KAK 204	S002S036W16	160
ADL 644898	KAK 205	S002S036W16	160
ADL 644899	KAK 206	S002S036W15	160
ADL 644900	KAK 207	S002S036W15	160
ADL 644901	KAK 208	S002S036W14	160
ADL 644902	KAK 209	S002S036W14	160
ADL 644903	KAK 210	S002S036W13	160
ADL 644904	KAK 211	S002S036W13	160
ADL 644905	KAK 212	S002S036W13	160
ADL 644906	KAK 213	S002S036W13	160
ADL 644907	KAK 214	S002S036W14	160
ADL 644908	KAK 215	S002S036W14	160
ADL 644909	KAK 216	S002S036W15	160
ADL 644910	KAK 217	S002S036W15	160
ADL 644911	KAK 218	S002S036W16	160
ADL 644912	KAK 219	S002S036W16	160
ADL 645600	SP 310	S005S037W20	160
ADL 645601	SP 311	S005S037W20	160
ADL 645606	SP 316	S005S037W17	160
ADL 645607	SP 317	S005S037W17	160
ADL 645608	SP 318	S005S037W17	160
ADL 645609	SP 319	S005S037W17	160
ADL 646604	PEBBLE BEACH 5942	S003S035W18	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 646605	PEBBLE BEACH 5943	S003S035W18	40
ADL 646606	PEB K 1	S003S035W36	160
ADL 646607	PEB K 2	S003S035W36	160
ADL 646608	PEB K 3	S003S035W36	160
ADL 646609	PEB K 4	S003S035W36	160
ADL 646610	PEB K 5	S004S035W01	40
ADL 646611	PEB K 6	S004S035W01	40
ADL 646612	PEB K 7	S004S035W01	40
ADL 646613	PEB K 8	S004S035W01	40
ADL 646614	PEB K 9	S004S034W06	40
ADL 646615	PEB K 10	S004S034W06	40
ADL 646616	PEB K 11	S004S034W06	40
ADL 646617	PEB K 12	S004S034W06	40
ADL 648906	PEB WB 64	S003S036W35	160
ADL 648907	PEB WB 65	S003S036W35	160
ADL 648908	PEB WB 66	S003S036W35	160
ADL 648909	PEB WB 67	S003S036W35	160
ADL 649664	KAK 220	S002S037W23	160
ADL 649665	KAK 221	S002S037W23	160
ADL 649666	KAK 222	S002S037W22	160
ADL 649667	KAK 223	S002S037W22	160
ADL 649668	KAK 224	S002S037W21	160
ADL 649669	KAK 225	S002S037W21	160
ADL 649670	KAK 226	S002S037W20	160
ADL 649671	KAK 227	S002S037W21	160
ADL 649672	KAK 228	S002S037W21	160
ADL 649673	KAK 229	S002S037W22	160
ADL 649674	KAK 230	S002S037W22	160
ADL 649675	KAK 231	S002S037W23	160
ADL 649676	KAK 232	S002S037W23	160
ADL 649677	KAK 233	S002S037W26	160
ADL 649678	KAK 234	S002S037W26	160
ADL 649679	KAK 235	S002S037W27	160
ADL 649680	KAK 236	S002S037W27	160
ADL 649681	KAK 237	S002S037W28	160
ADL 649682	KAK 238	S002S037W28	160
ADL 649683	KAK 239	S002S037W29	160
ADL 649684	KAK 240	S002S037W29	160
ADL 649685	KAK 241	S002S037W29	160
ADL 649686	KAK 242	S002S037W29	160
ADL 649687	KAK 243	S002S037W28	160
ADL 649688	KAK 244	S002S037W28	160
ADL 649689	KAK 245	S002S037W27	160
ADL 649690	KAK 246	S002S037W27	160
ADL 649691	KAK 247	S002S037W26	160
ADL 649692	KAK 248	S002S037W35	160
ADL 649693	KAK 249	S002S037W34	160
ADL 649694	KAK 250	S002S037W34	160
ADL 649695	KAK 251	S002S037W33	160
ADL 649696	KAK 252	S002S037W33	160
ADL 649697	KAK 253	S002S037W32	160
ADL 649698	KAK 254	S002S037W32	160
ADL 649699	KAK 255	S002S037W32	160
ADL 649700	KAK 256	S002S037W32	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 649701	KAK 257	S002S037W33	160
ADL 649702	KAK 258	S002S037W33	160
ADL 649703	KAK 259	S002S037W34	160
ADL 649704	KAK 260	S002S037W34	160
ADL 649705	KAK 261	S002S037W35	160
ADL 649706	KAK 262	S002S037W35	160
ADL 649707	KAK 263	S003S037W01	160
ADL 649708	KAK 264	S003S037W02	160
ADL 649709	KAK 265	S003S037W02	160
ADL 649710	KAK 266	S003S037W03	160
ADL 649711	KAK 267	S003S037W03	160
ADL 649712	KAK 268	S003S037W04	160
ADL 649713	KAK 269	S003S037W04	160
ADL 649714	KAK 270	S003S037W05	160
ADL 649715	KAK 271	S003S037W05	160
ADL 649716	KAK 272	S003S037W05	160
ADL 649717	KAK 273	S003S037W05	160
ADL 649718	KAK 274	S003S037W04	160
ADL 649719	KAK 275	S003S037W04	160
ADL 649720	KAK 276	S003S037W03	160
ADL 649721	KAK 277	S003S037W03	160
ADL 649722	KAK 278	S003S037W02	160
ADL 649723	KAK 279	S003S037W02	160
ADL 649724	KAK 280	S003S037W01	160
ADL 649725	KAK 281	S003S037W12	160
ADL 649726	KAK 282	S003S037W11	160
ADL 649727	KAK 283	S003S037W11	160
ADL 649728	KAK 284	S003S037W10	160
ADL 649729	KAK 285	S003S037W10	160
ADL 649730	KAK 286	S003S037W09	160
ADL 649731	KAK 287	S003S037W09	160
ADL 649732	KAK 288	S003S037W08	160
ADL 649733	KAK 289	S003S037W08	160
ADL 649734	KAK 290	S003S037W08	160
ADL 649735	KAK 291	S003S037W08	160
ADL 649736	KAK 292	S003S037W09	160
ADL 649737	KAK 293	S003S037W09	160
ADL 649738	KAK 294	S003S037W10	160
ADL 649739	KAK 295	S003S037W10	160
ADL 649740	KAK 296	S003S037W11	160
ADL 649741	KAK 297	S003S037W11	160
ADL 649742	KAK 298	S003S037W12	160
ADL 649743	KAK 299	S003S037W13	160
ADL 649744	KAK 300	S003S037W14	160
ADL 649745	KAK 301	S003S037W14	160
ADL 649746	KAK 302	S003S037W15	160
ADL 649747	KAK 303	S003S037W15	160
ADL 649748	KAK 304	S003S037W16	160
ADL 649749	KAK 305	S003S037W16	160
ADL 649750	KAK 306	S003S037W17	160
ADL 649751	KAK 307	S003S037W17	160
ADL 649752	KAK 308	S003S037W17	160
ADL 649753	KAK 309	S003S037W17	160
ADL 649754	KAK 310	S003S037W16	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 649755	KAK 311	S003S037W16	160
ADL 649756	KAK 312	S003S037W15	160
ADL 649757	KAK 313	S003S037W15	160
ADL 649758	KAK 314	S003S037W14	160
ADL 649759	KAK 315	S003S037W14	160
ADL 649760	KAK 316	S003S037W13	160
ADL 649761	KAK 317	S003S037W23	160
ADL 649762	KAK 318	S003S037W23	160
ADL 649763	KAK 319	S003S037W22	160
ADL 649764	KAK 320	S003S037W22	160
ADL 649765	KAK 321	S003S037W21	160
ADL 649766	KAK 322	S003S037W21	160
ADL 649767	KAK 323	S003S037W20	160
ADL 649768	KAK 324	S003S037W20	160
ADL 649769	KAK 325	S003S037W20	160
ADL 649770	KAK 326	S003S037W29	160
ADL 657890	KAK 327	S004S037W04	160
ADL 657891	KAK 328	S004S037W04	160
ADL 657892	KAK 329	S004S037W04	160
ADL 657893	KAK 330	S004S037W09	160
ADL 657894	KAK 331	S004S037W10	160
ADL 657895	KAK 332	S004S037W10	160
ADL 657896	KAK 333	S004S037W10	160
ADL 657897	KAK 334	S004S037W10	160
ADL 657898	KAK 335	S004S037W09	160
ADL 657899	KAK 336	S004S037W16	160
ADL 657900	KAK 337	S004S037W15	160
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ADL 657902	KAK 339	S004S037W14	160
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ADL 657905	KAK 342	S004S037W13	160
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ADL 657908	KAK 345	S004S037W15	160
ADL 657909	KAK 346	S004S037W15	160
ADL 657910	KAK 347	S004S037W16	160
ADL 657911	KAK 348	S004S037W21	160
ADL 657912	KAK 349	S004S037W22	160
ADL 657913	KAK 350	S004S037W22	160
ADL 657914	KAK 351	S004S037W23	160
ADL 657915	KAK 352	S004S037W23	160
ADL 657916	KAK 353	S004S037W24	160
ADL 657917	KAK 354	S004S037W24	160
ADL 657918	KAK 355	S004S037W23	160
ADL 657919	KAK 356	S004S037W23	160
ADL 657920	KAK 357	S004S037W22	160
ADL 657921	KAK 358	S004S037W22	160
ADL 657922	KAK 359	S004S037W21	160
ADL 657923	KAK 360	S004S037W28	160
ADL 657924	KAK 361	S004S037W27	160
ADL 657925	KAK 362	S004S037W27	160
ADL 657926	KAK 363	S004S037W26	160
ADL 657927	KAK 364	S004S037W26	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 657928	KAK 365	S004S037W25	160
ADL 657929	KAK 366	S004S037W25	160
ADL 657930	KAK 367	S004S037W26	160
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ADL 657932	KAK 369	S004S037W27	160
ADL 657933	KAK 370	S004S037W27	160
ADL 657934	KAK 371	S004S037W28	160
ADL 657935	KAK 372	S004S037W33	160
ADL 657936	KAK 373	S004S037W34	160
ADL 657937	KAK 374	S004S037W34	160
ADL 657938	KAK 375	S004S037W35	160
ADL 657939	KAK 376	S004S037W35	160
ADL 657940	KAK 377	S004S037W36	160
ADL 657941	KAK 378	S004S037W36	160
ADL 657942	KAK 379	S004S037W35	160
ADL 657943	KAK 380	S004S037W35	160
ADL 657944	KAK 381	S004S037W34	160
ADL 657945	KAK 382	S004S037W34	160
ADL 657946	KAK 383	S004S037W33	160
ADL 657947	KAK 384	S005S037W06	160
ADL 657948	KAK 385	S005S037W05	160
ADL 657949	KAK 386	S005S037W05	160
ADL 657950	KAK 387	S005S037W04	160
ADL 657951	KAK 388	S005S037W04	160
ADL 657952	KAK 389	S005S037W04	160
ADL 657953	KAK 390	S005S037W04	160
ADL 657954	KAK 391	S005S037W05	160
ADL 657955	KAK 392	S005S037W05	160
ADL 657958	KAK 395	S005S037W08	160
ADL 657959	KAK 396	S005S037W08	160
ADL 657960	KAK 397	S005S037W09	160
ADL 657961	KAK 398	S005S037W09	160
ADL 657962	KAK 399	S005S037W09	160
ADL 657963	KAK 400	S005S037W09	160
ADL 657964	KAK 401	S005S037W08	160
ADL 657965	KAK 402	S005S037W08	160
ADL 663828	KAK 136A	S002S036W30	160
ADL 663829	KAK 137A	S002S036W30	160
ADL 663830	KAK 138A	S002S036W19	160
ADL 663831	KAK 139A	S002S036W19	160
ADL 663832	KAK 144A	S002S036W19	160
ADL 663833	KAK 145A	S002S036W19	160
ADL 663834	KAK 146A	S002S036W18	160
ADL 663835	KAK 147A	S002S036W18	160
ADL 663836	KAK 158A	S002S036W18	160
ADL 663837	KAK 159A	S002S036W18	160
ADL 663838	KAK 160A	S002S036W17	160
ADL 663839	KAK 161A	S002S036W17	160
ADL 663840	KAK 162A	S002S036W17	160
ADL 663841	KAK 163A	S002S036W17	160
ADL 663842	KAK 164A	S002S036W20	160
ADL 663843	KAK 165A	S002S036W20	160
ADL 663844	KAK 166A	S002S036W20	160
ADL 663845	KAK 167A	S002S036W20	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 663846	KAK 168A	S002S036W29	160
ADL 663847	KAK 169A	S002S036W29	160
ADL 663848	KAK 170A	S002S036W28	160
ADL 668740	PEBA 113	S003S033W31	160
ADL 668741	KAS 1	S005S037W19	160
ADL 668742	KAS 2	S005S037W19	160
ADL 668743	KAS 3	S005S037W20	160
ADL 668744	KAS 4	S005S037W20	160
ADL 668749	KAS 9	S005S037W30	160
ADL 668750	KAS 10	S005S037W30	160
ADL 668751	KAS 11	S005S037W29	160
ADL 668752	KAS 12	S005S037W29	160
ADL 668753	KAS 13	S005S037W28	160
ADL 668758	KAS 18	S005S037W30	160
ADL 668759	KAS 19	S005S037W30	160
ADL 668760	KAS 20	S005S037W29	160
ADL 668761	KAS 21	S005S037W29	160
ADL 668762	KAS 22	S005S037W28	160
ADL 668769	KAS 29	S005S037W31	160
ADL 668770	KAS 30	S005S037W31	160
ADL 668771	KAS 31	S005S037W32	160
ADL 668772	KAS 32	S005S037W32	160
ADL 668773	KAS 33	S005S037W33	160
ADL 668784	KAS 44	S005S037W31	160
ADL 668785	KAS 45	S005S037W31	160
ADL 668786	KAS 46	S005S037W32	160
ADL 668787	KAS 47	S005S037W32	160
ADL 668788	KAS 48	S005S037W33	160
ADL 668801	KAS 61	S006S038W01	160
ADL 668802	KAS 62	S006S037W06	160
ADL 668803	KAS 63	S006S037W06	160
ADL 668804	KAS 64	S006S037W05	160
ADL 668805	KAS 65	S006S037W05	160
ADL 668806	KAS 66	S006S037W04	160
ADL 668823	KAS 83	S006S038W02	160
ADL 668824	KAS 84	S006S038W01	160
ADL 668825	KAS 85	S006S038W01	160
ADL 668826	KAS 86	S006S037W06	160
ADL 668827	KAS 87	S006S037W06	160
ADL 668828	KAS 88	S006S037W05	160
ADL 668829	KAS 89	S006S037W05	160
ADL 668849	KAS 109	S006S038W11	160
ADL 668850	KAS 110	S006S038W11	160
ADL 668851	KAS 111	S006S038W12	160
ADL 668852	KAS 112	S006S038W12	160
ADL 668853	KAS 113	S006S037W07	160
ADL 668854	KAS 114	S006S037W07	160
ADL 668855	KAS 115	S006S037W08	160
ADL 668875	KAS 135	S006S038W10	160
ADL 668876	KAS 136	S006S038W11	160
ADL 668877	KAS 137	S006S038W11	160
ADL 668878	KAS 138	S006S038W12	160
ADL 668879	KAS 139	S006S038W12	160
ADL 668880	KAS 140	S006S037W07	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 668881	KAS 141	S006S037W07	160
ADL 668901	KAS 161	S006S038W15	160
ADL 668902	KAS 162	S006S038W15	160
ADL 668903	KAS 163	S006S038W14	160
ADL 668904	KAS 164	S006S038W14	160
ADL 668905	KAS 165	S006S038W13	160
ADL 668906	KAS 166	S006S038W13	160
ADL 668929	KAS 189	S006S038W15	160
ADL 668930	KAS 190	S006S038W15	160
ADL 668931	KAS 191	S006S038W14	160
ADL 668932	KAS 192	S006S038W14	160
ADL 668933	KAS 193	S006S038W13	160
ADL 668934	KAS 194	S006S038W13	160
ADL 668956	KAS 216	S006S038W21	160
ADL 668957	KAS 217	S006S038W22	160
ADL 668958	KAS 218	S006S038W22	160
ADL 668959	KAS 219	S006S038W23	160
ADL 668960	KAS 220	S006S038W23	160
ADL 668961	KAS 221	S006S038W24	160
ADL 668983	KAS 243	S006S038W21	160
ADL 668984	KAS 244	S006S038W21	160
ADL 668985	KAS 245	S006S038W22	160
ADL 668986	KAS 246	S006S038W22	160
ADL 668987	KAS 247	S006S038W23	160
ADL 668988	KAS 248	S006S038W23	160
ADL 669010	KAS 270	S006S038W29	160
ADL 669011	KAS 271	S006S038W28	160
ADL 669012	KAS 272	S006S038W28	160
ADL 669013	KAS 273	S006S038W27	160
ADL 669014	KAS 274	S006S038W27	160
ADL 669015	KAS 275	S006S038W26	160
ADL 669038	KAS 298	S006S038W29	160
ADL 669039	KAS 299	S006S038W28	160
ADL 669040	KAS 300	S006S038W28	160
ADL 669041	KAS 301	S006S038W27	160
ADL 669042	KAS 302	S006S038W27	160
ADL 669043	KAS 303	S006S038W26	160
ADL 669060	KAS 324	S006S038W32	160
ADL 669061	KAS 325	S006S038W32	160
ADL 669062	KAS 326	S006S038W33	160
ADL 669063	KAS 327	S006S038W33	160
ADL 669064	KAS 328	S006S038W34	160
ADL 669065	KAS 329	S006S038W34	160
ADL 669075	KAS 340	S006S038W32	160
ADL 669076	KAS 341	S006S038W32	160
ADL 669077	KAS 342	S006S038W33	160
ADL 669078	KAS 343	S006S038W33	160
ADL 669079	KAS 344	S006S038W34	160
ADL 669087	KAS 352	S007S038W06	160
ADL 669088	KAS 353	S007S038W05	160
ADL 669089	KAS 354	S007S038W05	160
ADL 669090	KAS 355	S007S038W04	160
ADL 669091	KAS 356	S007S038W04	160
ADL 669098	KAS 363	S007S038W06	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 669099	KAS 364	S007S038W06	160
ADL 669100	KAS 365	S007S038W05	160
ADL 669101	KAS 366	S007S038W05	160
ADL 669102	KAS 367	S007S038W04	160
ADL 669109	KAS 374	S007S038W07	160
ADL 669110	KAS 375	S007S038W07	160
ADL 669111	KAS 376	S007S038W08	160
ADL 669112	KAS 377	S007S038W08	160
ADL 669118	KAS 383	S007S039W12	160
ADL 669119	KAS 384	S007S038W07	160
ADL 669120	KAS 385	S007S038W07	160
ADL 669121	KAS 386	S007S038W08	160
ADL 669122	KAS 387	S007S038W08	160
ADL 669127	KAS 392	S007S039W13	160
ADL 669128	KAS 393	S007S038W18	160
ADL 669129	KAS 394	S007S038W18	160
ADL 669130	KAS 395	S007S038W17	160
ADL 669135	KAS 400	S007S039W13	160
ADL 669136	KAS 401	S007S039W13	160
ADL 669137	KAS 402	S007S038W18	160
ADL 669138	KAS 403	S007S038W18	160

Mineral Claims

Pebble West Claims Corp.
3201 C Street, Suite 602
Anchorage, AK 99503

ADL No.	Claim Name	MTRS	Total Acres
ADL 516769	SILL 5951	S004S035W12	40
ADL 516770	SILL 5952	S004S035W12	40
ADL 516779	SILL 6051	S004S035W12	40
ADL 516780	SILL 6052	S004S035W12	40
ADL 516789	SILL 6151	S004S035W12	40
ADL 516790	SILL 6152	S004S035W12	40
ADL 516797	SILL 6247	S004S035W11	40
ADL 516798	SILL 6248	S004S035W11	40
ADL 516799	SILL 6249	S004S035W12	40
ADL 516800	SILL 6250	S004S035W12	40
ADL 516801	SILL 6251	S004S035W12	40
ADL 516802	SILL 6252	S004S035W12	40
ADL 516806	PEBBLE BEACH 5448	S003S035W20	40
ADL 516807	PEBBLE BEACH 5449	S003S035W20	40
ADL 516808	PEBBLE BEACH 5450	S003S035W21	40
ADL 516809	PEBBLE BEACH 5451	S003S035W21	40
ADL 516810	PEBBLE BEACH 5452	S003S035W21	40
ADL 516811	PEBBLE BEACH 5453	S003S035W21	40
ADL 516812	PEBBLE BEACH 5454	S003S035W22	40
ADL 516813	PEBBLE BEACH 5548	S003S035W20	40
ADL 516814	PEBBLE BEACH 5549	S003S035W20	40
ADL 516815	PEBBLE BEACH 5550	S003S035W21	40
ADL 516816	PEBBLE BEACH 5551	S003S035W21	40
ADL 516817	PEBBLE BEACH 5552	S003S035W21	40
ADL 516818	PEBBLE BEACH 5553	S003S035W21	40
ADL 516819	PEBBLE BEACH 5554	S003S035W22	40
ADL 516820	PEBBLE BEACH 5651	S003S035W21	40
ADL 516821	PEBBLE BEACH 5652	S003S035W21	40
ADL 516822	PEBBLE BEACH 5653	S003S035W21	40
ADL 516823	PEBBLE BEACH 5654	S003S035W22	40
ADL 516824	PEBBLE BEACH 5751	S003S035W21	40
ADL 516825	PEBBLE BEACH 5752	S003S035W21	40
ADL 516826	PEBBLE BEACH 5753	S003S035W21	40
ADL 516827	PEBBLE BEACH 5754	S003S035W22	40
ADL 516828	PEBBLE BEACH 5852	S003S035W16	40
ADL 516829	PEBBLE BEACH 5853	S003S035W16	40
ADL 516830	PEBBLE BEACH 5854	S003S035W15	40
ADL 516831	PEBBLE BEACH 5952	S003S035W16	40
ADL 516832	PEBBLE BEACH 5953	S003S035W16	40
ADL 516833	PEBBLE BEACH 5954	S003S035W15	40
ADL 516834	PEBBLE BEACH 6052	S003S035W16	40
ADL 516835	PEBBLE BEACH 6053	S003S035W16	40
ADL 516836	PEBBLE BEACH 6054	S003S035W15	40
ADL 516837	PEBBLE BEACH 6153	S003S035W16	40
ADL 516838	PEBBLE BEACH 6154	S003S035W15	40
ADL 516839	PEBBLE BEACH 4651	S003S035W33	40
ADL 516840	PEBBLE BEACH 4652	S003S035W33	40
ADL 516841	PEBBLE BEACH 4653	S003S035W33	40
ADL 516842	PEBBLE BEACH 4751	S003S035W33	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 516843	PEEBLE BEACH 4752	S003S035W33	40
ADL 516844	PEEBLE BEACH 4753	S003S035W33	40
ADL 516845	PEEBLE BEACH 4851	S003S035W33	40
ADL 516846	PEEBLE BEACH 4852	S003S035W33	40
ADL 516847	PEEBLE BEACH 4853	S003S035W33	40
ADL 516848	PEEBLE BEACH 4951	S003S035W33	40
ADL 516849	PEEBLE BEACH 4952	S003S035W33	40
ADL 516850	PEEBLE BEACH 4953	S003S035W33	40
ADL 516851	PEEBLE BEACH 5048	S003S035W29	40
ADL 516852	PEEBLE BEACH 5049	S003S035W29	40
ADL 516853	PEEBLE BEACH 5050	S003S035W28	40
ADL 516854	PEEBLE BEACH 5051	S003S035W28	40
ADL 516855	PEEBLE BEACH 5052	S003S035W28	40
ADL 516856	PEEBLE BEACH 5053	S003S035W28	40
ADL 516857	PEEBLE BEACH 5148	S003S035W29	40
ADL 516858	PEEBLE BEACH 5149	S003S035W29	40
ADL 516859	PEEBLE BEACH 5150	S003S035W28	40
ADL 516860	PEEBLE BEACH 5151	S003S035W28	40
ADL 516861	PEEBLE BEACH 5152	S003S035W28	40
ADL 516862	PEEBLE BEACH 5153	S003S035W28	40
ADL 516863	PEEBLE BEACH 5248	S003S035W29	40
ADL 516864	PEEBLE BEACH 5249	S003S035W29	40
ADL 516865	PEEBLE BEACH 5250	S003S035W28	40
ADL 516866	PEEBLE BEACH 5251	S003S035W28	40
ADL 516867	PEEBLE BEACH 5252	S003S035W28	40
ADL 516868	PEEBLE BEACH 5253	S003S035W28	40
ADL 516869	PEEBLE BEACH 5348	S003S035W29	40
ADL 516870	PEEBLE BEACH 5349	S003S035W29	40
ADL 516871	PEEBLE BEACH 5350	S003S035W28	40
ADL 516872	PEEBLE BEACH 5351	S003S035W28	40
ADL 516873	PEEBLE BEACH 5352	S003S035W28	40
ADL 516874	PEEBLE BEACH 5353	S003S035W28	40
ADL 516879	SILL 6351	S004S035W01	40
ADL 516880	SILL 6352	S004S035W01	40
ADL 516888	SILL 6451	S004S035W01	40
ADL 516889	SILL 6452	S004S035W01	40
ADL 516948	PEBBLE BEACH 3850	S004S035W09	40
ADL 516949	PEBBLE BEACH 3851	S004S035W09	40
ADL 516950	PEBBLE BEACH 3852	S004S035W09	40
ADL 516951	PEBBLE BEACH 3950	S004S035W09	40
ADL 516952	PEBBLE BEACH 3951	S004S035W09	40
ADL 516953	PEBBLE BEACH 3952	S004S035W09	40
ADL 516954	PEBBLE BEACH 4050	S004S035W09	40
ADL 516955	PEBBLE BEACH 4051	S004S035W09	40
ADL 516956	PEBBLE BEACH 4052	S004S035W09	40
ADL 516957	PEBBLE BEACH 4150	S004S035W09	40
ADL 516958	PEBBLE BEACH 4151	S004S035W09	40
ADL 516959	PEBBLE BEACH 4152	S004S035W09	40
ADL 516960	PEBBLE BEACH 4250	S004S035W04	40
ADL 516961	PEBBLE BEACH 4251	S004S035W04	40
ADL 516962	PEBBLE BEACH 4252	S004S035W04	40
ADL 516963	PEBBLE BEACH 4253	S004S035W04	40
ADL 516964	PEBBLE BEACH 4254	S004S035W03	40
ADL 516965	PEBBLE BEACH 4350	S004S035W04	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 516966	PEBBLE BEACH 4351	S004S035W04	40
ADL 516967	PEBBLE BEACH 4352	S004S035W04	40
ADL 516968	PEBBLE BEACH 4353	S004S035W04	40
ADL 516969	PEBBLE BEACH 4354	S004S035W03	40
ADL 516970	PEBBLE BEACH 4451	S004S035W04	40
ADL 516971	PEBBLE BEACH 4452	S004S035W04	40
ADL 516972	PEBBLE BEACH 4453	S004S035W04	40
ADL 516973	PEBBLE BEACH 4551	S004S035W04	40
ADL 516974	PEBBLE BEACH 4552	S004S035W04	40
ADL 516975	PEBBLE BEACH 4553	S004S035W04	40
ADL 524511	SILL 5543	S004S035W15	40
ADL 524512	SILL 5544	S004S035W15	40
ADL 524515	SILL 5643	S004S035W15	40
ADL 524516	SILL 5644	S004S035W15	40
ADL 524519	SILL 5743	S004S035W15	40
ADL 524520	SILL 5744	S004S035W15	40
ADL 524523	SILL 5843	S004S035W15	40
ADL 524524	SILL 5844	S004S035W15	40
ADL 524527	SILL 5943	S004S035W10	40
ADL 524528	SILL 5944	S004S035W10	40
ADL 524531	SILL 6043	S004S035W10	40
ADL 524532	SILL 6044	S004S035W10	40
ADL 524535	SILL 6143	S004S035W10	40
ADL 524536	SILL 6144	S004S035W10	40
ADL 524539	SILL 6243	S004S035W10	40
ADL 524540	SILL 6244	S004S035W10	40
ADL 524541	SILL 6245	S004S035W11	40
ADL 524542	SILL 6246	S004S035W11	40
ADL 524543	SILL 6343	S004S035W03	40
ADL 524544	SILL 6344	S004S035W03	40
ADL 524550	SILL 6443	S004S035W03	40
ADL 524551	SILL 6444	S004S035W03	40
ADL 524557	SILL 6543	S004S035W03	40
ADL 524558	SILL 6544	S004S035W03	40
ADL 524568	SILL 6643	S004S035W03	40
ADL 524569	SILL 6644	S004S035W03	40
ADL 524579	SILL 6743	S003S035W34	40
ADL 524580	SILL 6744	S003S035W34	40
ADL 524595	SILL 6843	S003S035W34	40
ADL 524596	SILL 6844	S003S035W34	40
ADL 524611	SILL 6943	S003S035W34	40
ADL 524612	SILL 6944	S003S035W34	40
ADL 524630	SILL 7043	S003S035W34	40
ADL 524631	SILL 7044	S003S035W34	40
ADL 524649	SILL 7143	S003S035W27	40
ADL 524650	SILL 7144	S003S035W27	40
ADL 524668	SILL 7243	S003S035W27	40
ADL 524669	SILL 7244	S003S035W27	40
ADL 524684	SILL 7343	S003S035W27	40
ADL 524685	SILL 7344	S003S035W27	40
ADL 524698	SILL 7443	S003S035W27	40
ADL 524699	SILL 7444	S003S035W27	40
ADL 524712	SILL 7543	S003S035W22	40
ADL 524713	SILL 7544	S003S035W22	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 524714	SILL 7545	S003S035W23	40
ADL 524715	SILL 7546	S003S035W23	40
ADL 524716	SILL 7547	S003S035W23	40
ADL 524717	SILL 7548	S003S035W23	40
ADL 524748	PEBBLE BEACH 3452	S004S035W16	40
ADL 524749	PEBBLE BEACH 3453	S004S035W16	40
ADL 524750	PEBBLE BEACH 3454	S004S035W15	40
ADL 524751	PEBBLE BEACH 3455	S004S035W15	40
ADL 524752	PEBBLE BEACH 3552	S004S035W16	40
ADL 524753	PEBBLE BEACH 3553	S004S035W16	40
ADL 524754	PEBBLE BEACH 3554	S004S035W15	40
ADL 524755	PEBBLE BEACH 3555	S004S035W15	40
ADL 524756	PEBBLE BEACH 3652	S004S035W16	40
ADL 524757	PEBBLE BEACH 3653	S004S035W16	40
ADL 524758	PEBBLE BEACH 3654	S004S035W15	40
ADL 524759	PEBBLE BEACH 3655	S004S035W15	40
ADL 524760	PEBBLE BEACH 3752	S004S035W16	40
ADL 524761	PEBBLE BEACH 3753	S004S035W16	40
ADL 524762	PEBBLE BEACH 3754	S004S035W15	40
ADL 524763	PEBBLE BEACH 3755	S004S035W15	40
ADL 524764	PEBBLE BEACH 3848	S004S035W08	40
ADL 524765	PEBBLE BEACH 3849	S004S035W08	40
ADL 524766	PEBBLE BEACH 3853	S004S035W09	40
ADL 524767	PEBBLE BEACH 3854	S004S035W10	40
ADL 524768	PEBBLE BEACH 3855	S004S035W10	40
ADL 524769	PEBBLE BEACH 3948	S004S035W08	40
ADL 524770	PEBBLE BEACH 3949	S004S035W08	40
ADL 524771	PEBBLE BEACH 3953	S004S035W09	40
ADL 524772	PEBBLE BEACH 3954	S004S035W10	40
ADL 524773	PEBBLE BEACH 3955	S004S035W10	40
ADL 524774	PEBBLE BEACH 4048	S004S035W08	40
ADL 524775	PEBBLE BEACH 4049	S004S035W08	40
ADL 524776	PEBBLE BEACH 4053	S004S035W09	40
ADL 524777	PEBBLE BEACH 4054	S004S035W10	40
ADL 524778	PEBBLE BEACH 4055	S004S035W10	40
ADL 524779	PEBBLE BEACH 4148	S004S035W08	40
ADL 524780	PEBBLE BEACH 4149	S004S035W08	40
ADL 524781	PEBBLE BEACH 4153	S004S035W09	40
ADL 524782	PEBBLE BEACH 4154	S004S035W10	40
ADL 524783	PEBBLE BEACH 4155	S004S035W10	40
ADL 524784	PEBBLE BEACH 4248	S004S035W05	0
ADL 524785	PEBBLE BEACH 4249	S004S035W05	40
ADL 524786	PEBBLE BEACH 4255	S004S035W03	40
ADL 524787	PEBBLE BEACH 4348	S004S035W05	40
ADL 524788	PEBBLE BEACH 4349	S004S035W05	40
ADL 524789	PEBBLE BEACH 4355	S004S035W03	40
ADL 524790	PEBBLE BEACH 4448	S004S035W05	40
ADL 524791	PEBBLE BEACH 4449	S004S035W05	40
ADL 524792	PEBBLE BEACH 4450	S004S035W04	40
ADL 524793	PEBBLE BEACH 4454	S004S035W03	40
ADL 524794	PEBBLE BEACH 4455	S004S035W03	40
ADL 524795	PEBBLE BEACH 4548	S004S035W05	40
ADL 524796	PEBBLE BEACH 4549	S004S035W05	40
ADL 524797	PEBBLE BEACH 4550	S004S035W04	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 524798	PEBBLE BEACH 4554	S004S035W03	40
ADL 524799	PEBBLE BEACH 4555	S004S035W03	40
ADL 524800	PEBBLE BEACH 4648	S003S035W32	40
ADL 524801	PEBBLE BEACH 4649	S003S035W32	40
ADL 524802	PEBBLE BEACH 4650	S003S035W33	40
ADL 524803	PEBBLE BEACH 4654	S003S035W34	40
ADL 524804	PEBBLE BEACH 4655	S003S035W34	40
ADL 524805	PEBBLE BEACH 4748	S003S035W32	40
ADL 524806	PEBBLE BEACH 4749	S003S035W32	40
ADL 524807	PEBBLE BEACH 4750	S003S035W33	40
ADL 524808	PEBBLE BEACH 4754	S003S035W34	40
ADL 524809	PEBBLE BEACH 4755	S003S035W34	40
ADL 524810	PEBBLE BEACH 4848	S003S035W32	40
ADL 524811	PEBBLE BEACH 4849	S003S035W32	40
ADL 524812	PEBBLE BEACH 4850	S003S035W33	40
ADL 524813	PEBBLE BEACH 4854	S003S035W34	40
ADL 524814	PEBBLE BEACH 4855	S003S035W34	40
ADL 524815	PEBBLE BEACH 4948	S003S035W32	40
ADL 524816	PEBBLE BEACH 4949	S003S035W32	40
ADL 524817	PEBBLE BEACH 4950	S003S035W33	40
ADL 524818	PEBBLE BEACH 4954	S003S035W34	40
ADL 524819	PEBBLE BEACH 4955	S003S035W34	40
ADL 524820	PEBBLE BEACH 5054	S003S035W27	40
ADL 524821	PEBBLE BEACH 5055	S003S035W27	40
ADL 524822	PEBBLE BEACH 5154	S003S035W27	40
ADL 524823	PEBBLE BEACH 5155	S003S035W27	40
ADL 524824	PEBBLE BEACH 5254	S003S035W27	40
ADL 524825	PEBBLE BEACH 5255	S003S035W27	40
ADL 524826	PEBBLE BEACH 5354	S003S035W27	40
ADL 524827	PEBBLE BEACH 5355	S003S035W27	40
ADL 524828	PEBBLE BEACH 5455	S003S035W22	40
ADL 524829	PEBBLE BEACH 5648	S003S035W20	40
ADL 524830	PEBBLE BEACH 5649	S003S035W20	40
ADL 524831	PEBBLE BEACH 5650	S003S035W21	40
ADL 524832	PEBBLE BEACH 5748	S003S035W20	40
ADL 524833	PEBBLE BEACH 5749	S003S035W20	40
ADL 524834	PEBBLE BEACH 5750	S003S035W21	40
ADL 524835	PEBBLE BEACH 5848	S003S035W17	40
ADL 524836	PEBBLE BEACH 5849	S003S035W17	40
ADL 524837	PEBBLE BEACH 5850	S003S035W16	40
ADL 524838	PEBBLE BEACH 5851	S003S035W16	40
ADL 524839	PEBBLE BEACH 5948	S003S035W17	40
ADL 524840	PEBBLE BEACH 5949	S003S035W17	40
ADL 524841	PEBBLE BEACH 5950	S003S035W16	40
ADL 524842	PEBBLE BEACH 5951	S003S035W16	40
ADL 524843	PEBBLE BEACH 6048	S003S035W17	40
ADL 524844	PEBBLE BEACH 6049	S003S035W17	40
ADL 524845	PEBBLE BEACH 6050	S003S035W16	40
ADL 524846	PEBBLE BEACH 6051	S003S035W16	40
ADL 524847	PEBBLE BEACH 6148	S003S035W17	40
ADL 524848	PEBBLE BEACH 6149	S003S035W17	40
ADL 524849	PEBBLE BEACH 6150	S003S035W16	40
ADL 524850	PEBBLE BEACH 6151	S003S035W16	40
ADL 524851	PEBBLE BEACH 6248	S003S035W08	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 524852	PEBBLE BEACH 6249	S003S035W08	40
ADL 524853	PEBBLE BEACH 6250	S003S035W09	40
ADL 524854	PEBBLE BEACH 6251	S003S035W09	40
ADL 524855	PEBBLE BEACH 6252	S003S035W09	40
ADL 524856	PEBBLE BEACH 6253	S003S035W09	40
ADL 524857	PEBBLE BEACH 6254	S003S035W10	40
ADL 524858	PEBBLE BEACH 6348	S003S035W08	40
ADL 524859	PEBBLE BEACH 6349	S003S035W08	40
ADL 524860	PEBBLE BEACH 6350	S003S035W09	40
ADL 524861	PEBBLE BEACH 6351	S003S035W09	40
ADL 524862	PEBBLE BEACH 6352	S003S035W09	40
ADL 524863	PEBBLE BEACH 6353	S003S035W09	40
ADL 524864	PEBBLE BEACH 6354	S003S035W10	40
ADL 525849	PEBBLE BEACH 6152	S003S035W16	40
ADL 531355	PEBBLE BEACH 3642	S004S035W18	40
ADL 531356	PEBBLE BEACH 3643	S004S035W18	40
ADL 531357	PEBBLE BEACH 3644	S004S035W18	40
ADL 531358	PEBBLE BEACH 3645	S004S035W18	40
ADL 531359	PEBBLE BEACH 3742	S004S035W18	40
ADL 531360	PEBBLE BEACH 3743	S004S035W18	40
ADL 531361	PEBBLE BEACH 3744	S004S035W18	40
ADL 531362	PEBBLE BEACH 3745	S004S035W18	40
ADL 531363	PEBBLE BEACH 3842	S004S035W07	40
ADL 531364	PEBBLE BEACH 3843	S004S035W07	40
ADL 531365	PEBBLE BEACH 3844	S004S035W07	40
ADL 531366	PEBBLE BEACH 3845	S004S035W07	40
ADL 531367	PEBBLE BEACH 3846	S004S035W08	40
ADL 531368	PEBBLE BEACH 3847	S004S035W08	40
ADL 531369	PEBBLE BEACH 3942	S004S035W07	40
ADL 531370	PEBBLE BEACH 3943	S004S035W07	40
ADL 531371	PEBBLE BEACH 3944	S004S035W07	40
ADL 531372	PEBBLE BEACH 3945	S004S035W07	40
ADL 531373	PEBBLE BEACH 3946	S004S035W08	40
ADL 531374	PEBBLE BEACH 3947	S004S035W08	40
ADL 531375	PEBBLE BEACH 4042	S004S035W07	40
ADL 531376	PEBBLE BEACH 4043	S004S035W07	40
ADL 531377	PEBBLE BEACH 4044	S004S035W07	40
ADL 531378	PEBBLE BEACH 4045	S004S035W07	40
ADL 531379	PEBBLE BEACH 4046	S004S035W08	40
ADL 531380	PEBBLE BEACH 4047	S004S035W08	40
ADL 531381	PEBBLE BEACH 4142	S004S035W07	40
ADL 531382	PEBBLE BEACH 4143	S004S035W07	40
ADL 531383	PEBBLE BEACH 4144	S004S035W07	40
ADL 531384	PEBBLE BEACH 4145	S004S035W07	40
ADL 531385	PEBBLE BEACH 4146	S004S035W08	40
ADL 531386	PEBBLE BEACH 4147	S004S035W08	40
ADL 531387	PEBBLE BEACH 4244	S004S035W06	40
ADL 531388	PEBBLE BEACH 4245	S004S035W06	40
ADL 531389	PEBBLE BEACH 4246	S004S035W05	40
ADL 531390	PEBBLE BEACH 4247	S004S035W05	40
ADL 531391	PEBBLE BEACH 4344	S004S035W06	40
ADL 531392	PEBBLE BEACH 4345	S004S035W06	40
ADL 531393	PEBBLE BEACH 4346	S004S035W05	40
ADL 531394	PEBBLE BEACH 4347	S004S035W05	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 531395	PEBBLE BEACH 4444	S004S035W06	40
ADL 531396	PEBBLE BEACH 4445	S004S035W06	40
ADL 531397	PEBBLE BEACH 4446	S004S035W05	40
ADL 531398	PEBBLE BEACH 4447	S004S035W05	40
ADL 531399	PEBBLE BEACH 4544	S004S035W06	40
ADL 531400	PEBBLE BEACH 4547	S004S035W05	40
ADL 531401	PEBBLE BEACH 4644	S003S035W31	40
ADL 531402	PEBBLE BEACH 4645	S003S035W31	40
ADL 531403	PEBBLE BEACH 4646	S003S035W32	40
ADL 531404	PEBBLE BEACH 4647	S003S035W32	40
ADL 531405	PEBBLE BEACH 4744	S003S035W31	40
ADL 531406	PEBBLE BEACH 4745	S003S035W31	40
ADL 531407	PEBBLE BEACH 4746	S003S035W32	40
ADL 531408	PEBBLE BEACH 4747	S003S035W32	40
ADL 531409	PEBBLE BEACH 4844	S003S035W31	40
ADL 531410	PEBBLE BEACH 4845	S003S035W31	40
ADL 531411	PEBBLE BEACH 4846	S003S035W32	40
ADL 531412	PEBBLE BEACH 4847	S003S035W32	40
ADL 531413	PEBBLE BEACH 4944	S003S035W31	40
ADL 531414	PEBBLE BEACH 4945	S003S035W31	40
ADL 531415	PEBBLE BEACH 4946	S003S035W32	40
ADL 531416	PEBBLE BEACH 4947	S003S035W32	40
ADL 531417	PEBBLE BEACH 5044	S003S035W30	40
ADL 531418	PEBBLE BEACH 5045	S003S035W30	40
ADL 531419	PEBBLE BEACH 5046	S003S035W29	40
ADL 531420	PEBBLE BEACH 5047	S003S035W29	40
ADL 531421	PEBBLE BEACH 5144	S003S035W30	40
ADL 531422	PEBBLE BEACH 5145	S003S035W30	40
ADL 531423	PEBBLE BEACH 5146	S003S035W29	40
ADL 531424	PEBBLE BEACH 5147	S003S035W29	40
ADL 531425	PEBBLE BEACH 5244	S003S035W30	40
ADL 531426	PEBBLE BEACH 5245	S003S035W30	40
ADL 531427	PEBBLE BEACH 5246	S003S035W29	40
ADL 531428	PEBBLE BEACH 5247	S003S035W29	40
ADL 531429	PEBBLE BEACH 5344	S003S035W30	40
ADL 531430	PEBBLE BEACH 5345	S003S035W30	40
ADL 531431	PEBBLE BEACH 5346	S003S035W29	40
ADL 531432	PEBBLE BEACH 5347	S003S035W29	40
ADL 531433	PEBBLE BEACH 5444	S003S035W19	40
ADL 531434	PEBBLE BEACH 5445	S003S035W19	40
ADL 531435	PEBBLE BEACH 5446	S003S035W20	40
ADL 531436	PEBBLE BEACH 5447	S003S035W20	40
ADL 531437	PEBBLE BEACH 5544	S003S035W19	40
ADL 531438	PEBBLE BEACH 5545	S003S035W19	40
ADL 531439	PEBBLE BEACH 5546	S003S035W20	40
ADL 531440	PEBBLE BEACH 5547	S003S035W20	40
ADL 531441	PEBBLE BEACH 5644	S003S035W19	40
ADL 531442	PEBBLE BEACH 5645	S003S035W19	40
ADL 531443	PEBBLE BEACH 5646	S003S035W20	40
ADL 531444	PEBBLE BEACH 5647	S003S035W20	40
ADL 531445	PEBBLE BEACH 5744	S003S035W19	40
ADL 531446	PEBBLE BEACH 5745	S003S035W19	40
ADL 531447	PEBBLE BEACH 5746	S003S035W20	40
ADL 531448	PEBBLE BEACH 5747	S003S035W20	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 531449	PEBBLE BEACH 5844	S003S035W18	40
ADL 531450	PEBBLE BEACH 5845	S003S035W18	40
ADL 531451	PEBBLE BEACH 5846	S003S035W17	40
ADL 531452	PEBBLE BEACH 5847	S003S035W17	40
ADL 531453	PEBBLE BEACH 5944	S003S035W18	40
ADL 531454	PEBBLE BEACH 5945	S003S035W18	40
ADL 531455	PEBBLE BEACH 5946	S003S035W17	40
ADL 531456	PEBBLE BEACH 5947	S003S035W17	40
ADL 531457	PEBBLE BEACH 6044	S003S035W18	40
ADL 531458	PEBBLE BEACH 6045	S003S035W18	40
ADL 531459	PEBBLE BEACH 6046	S003S035W17	40
ADL 531460	PEBBLE BEACH 6047	S003S035W17	40
ADL 531461	PEBBLE BEACH 6144	S003S035W18	40
ADL 531462	PEBBLE BEACH 6145	S003S035W18	40
ADL 531463	PEBBLE BEACH 6146	S003S035W17	40
ADL 531464	PEBBLE BEACH 6147	S003S035W17	40
ADL 531648	PEBBLE BEACH 4545	S004S035W06	40
ADL 531649	PEBBLE BEACH 4546	S004S035W05	40
ADL 540399	PEBBLE BEACH 5555	S003S035W22	40
ADL 540400	PEBBLE BEACH 5655	S003S035W22	40
ADL 540401	PEBBLE BEACH 5755	S003S035W22	40
ADL 540402	PEBBLE BEACH 5855	S003S035W15	40
ADL 540403	PEBBLE BEACH 5955	S003S035W15	40
ADL 540404	PEBBLE BEACH 6055	S003S035W15	40
ADL 540405	PEBBLE BEACH 6155	S003S035W15	40
ADL 540406	PEBBLE BEACH 6255	S003S035W10	40
ADL 540407	PEBBLE BEACH 6355	S003S035W10	40
ADL 540408	PEBBLE BEACH 6448	S003S035W08	40
ADL 540409	PEBBLE BEACH 6449	S003S035W08	40
ADL 540410	PEBBLE BEACH 6450	S003S035W09	40
ADL 540411	PEBBLE BEACH 6451	S003S035W09	40
ADL 540412	PEBBLE BEACH 6452	S003S035W09	40
ADL 540413	PEBBLE BEACH 6453	S003S035W09	40
ADL 540414	PEBBLE BEACH 6454	S003S035W10	40
ADL 540415	PEBBLE BEACH 6455	S003S035W10	40
ADL 540416	PEBBLE BEACH 6548	S003S035W08	40
ADL 540417	PEBBLE BEACH 6549	S003S035W08	40
ADL 540418	PEBBLE BEACH 6550	S003S035W09	40
ADL 540419	PEBBLE BEACH 6551	S003S035W09	40
ADL 540420	PEBBLE BEACH 6552	S003S035W09	40
ADL 540421	PEBBLE BEACH 6553	S003S035W09	40
ADL 540422	PEBBLE BEACH 6554	S003S035W10	40
ADL 540423	PEBBLE BEACH 6555	S003S035W10	40
ADL 540424	SILL 7643	S003S035W22	40
ADL 540425	SILL 7644	S003S035W22	40
ADL 540426	SILL 7645	S003S035W23	40
ADL 540427	SILL 7646	S003S035W23	40
ADL 540428	SILL 7647	S003S035W23	40
ADL 540429	SILL 7648	S003S035W23	40
ADL 540430	SILL 7743	S003S035W22	40
ADL 540431	SILL 7744	S003S035W22	40
ADL 540432	SILL 7745	S003S035W23	40
ADL 540433	SILL 7746	S003S035W23	40
ADL 540434	SILL 7747	S003S035W23	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 540435	SILL 7748	S003S035W23	40
ADL 540436	SILL 7843	S003S035W22	40
ADL 540437	SILL 7844	S003S035W22	40
ADL 540438	SILL 7845	S003S035W23	40
ADL 540439	SILL 7846	S003S035W23	40
ADL 540440	SILL 7847	S003S035W23	40
ADL 540441	SILL 7848	S003S035W23	40
ADL 540442	SILL 7943	S003S035W15	40
ADL 540443	SILL 7944	S003S035W15	40
ADL 540444	SILL 7945	S003S035W14	40
ADL 540445	SILL 7946	S003S035W14	40
ADL 540446	SILL 7947	S003S035W14	40
ADL 540447	SILL 7948	S003S035W14	40
ADL 540448	SILL 8043	S003S035W15	40
ADL 540449	SILL 8044	S003S035W15	40
ADL 540450	SILL 8045	S003S035W14	40
ADL 540451	SILL 8046	S003S035W14	40
ADL 540452	SILL 8047	S003S035W14	40
ADL 540453	SILL 8048	S003S035W14	40
ADL 540454	SILL 8143	S003S035W15	40
ADL 540455	SILL 8144	S003S035W15	40
ADL 540456	SILL 8145	S003S035W14	40
ADL 540457	SILL 8146	S003S035W14	40
ADL 540458	SILL 8147	S003S035W14	40
ADL 540459	SILL 8148	S003S035W14	40
ADL 540460	SILL 8243	S003S035W15	40
ADL 540461	SILL 8244	S003S035W15	40
ADL 540462	SILL 8245	S003S035W14	40
ADL 540463	SILL 8246	S003S035W14	40
ADL 540464	SILL 8247	S003S035W14	40
ADL 540465	SILL 8248	S003S035W14	40
ADL 540466	SILL 8343	S003S035W10	40
ADL 540467	SILL 8344	S003S035W10	40
ADL 540468	SILL 8443	S003S035W10	40
ADL 540469	SILL 8444	S003S035W10	40
ADL 540470	SILL 8543	S003S035W10	40
ADL 540471	SILL 8544	S003S035W10	40
ADL 540472	SILL 8643	S003S035W10	40
ADL 540473	SILL 8644	S003S035W10	40
ADL 541245	PB 113	S004S035W18	40
ADL 541246	PB 114	S004S035W18	40
ADL 541247	PB 115	S004S035W18	40
ADL 541248	PB 116	S004S035W18	40
ADL 541249	PB 117	S004S035W18	40
ADL 541250	PB 118	S004S035W18	40
ADL 541251	PB 119	S004S035W18	40
ADL 541252	PB 120	S004S035W18	40
ADL 542561	PEBBLE BEACH 4856	S003S035W34	4
ADL 542562	PEBBLE BEACH 4956	S003S035W34	4
ADL 542563	PEBBLE BEACH 5056	S003S035W27	4
ADL 542564	PEBBLE BEACH 5156	S003S035W27	4
ADL 542565	PEBBLE BEACH 5256	S003S035W27	4
ADL 542566	PEBBLE BEACH 5356	S003S035W27	4
ADL 542567	PEBBLE BEACH 5456	S003S035W22	4

ADL No.	Claim Name	MTRS	Total Acres
ADL 542568	PEBBLE BEACH 5556	S003S035W22	4
ADL 542569	PEBBLE BEACH 5656	S003S035W22	4
ADL 542570	PEBBLE BEACH 5756	S003S035W22	4
ADL 542571	PEBBLE BEACH 5856	S003S035W15	4
ADL 542572	PEBBLE BEACH 5956	S003S035W15	4
ADL 542573	PEBBLE BEACH 6056	S003S035W15	4
ADL 542574	PEBBLE BEACH 6156	S003S035W15	4
ADL 542575	PEBBLE BEACH 6256	S003S035W10	4
ADL 542576	PEBBLE BEACH 6356	S003S035W10	4
ADL 542577	PEBBLE BEACH 6456	S003S035W10	4
ADL 542578	PEBBLE BEACH 6556	S003S035W10	4
ADL 542579	PEBBLE BEACH 4642	S003S035W31	40
ADL 542580	PEBBLE BEACH 4643	S003S035W31	40
ADL 542581	PEBBLE BEACH 4742	S003S035W31	40
ADL 542582	PEBBLE BEACH 4743	S003S035W31	40
ADL 542583	PEBBLE BEACH 4842	S003S035W31	40
ADL 542584	PEBBLE BEACH 4843	S003S035W31	40
ADL 542585	PEBBLE BEACH 4942	S003S035W31	40
ADL 542586	PEBBLE BEACH 4943	S003S035W31	40
ADL 542587	PEBBLE BEACH 5042	S003S035W30	40
ADL 542588	PEBBLE BEACH 5043	S003S035W30	40
ADL 542589	PEBBLE BEACH 5142	S003S035W30	40
ADL 542590	PEBBLE BEACH 5143	S003S035W30	40
ADL 542591	PEBBLE BEACH 5242	S003S035W30	40
ADL 542592	PEBBLE BEACH 5243	S003S035W30	40
ADL 542593	PEBBLE BEACH 5342	S003S035W30	40
ADL 542594	PEBBLE BEACH 5343	S003S035W30	40
ADL 542595	PEBBLE BEACH 5442	S003S035W19	40
ADL 542596	PEBBLE BEACH 5443	S003S035W19	40
ADL 542597	PEBBLE BEACH 5542	S003S035W19	40
ADL 542598	PEBBLE BEACH 5543	S003S035W19	40
ADL 542599	PEBBLE BEACH 5642	S003S035W19	40
ADL 542600	PEBBLE BEACH 5643	S003S035W19	40
ADL 542601	PEBBLE BEACH 5742	S003S035W19	40
ADL 542602	PEBBLE BEACH 5743	S003S035W19	40
ADL 542603	PEBBLE BEACH 5842	S003S035W18	40
ADL 542604	PEBBLE BEACH 5843	S003S035W18	40
ADL 552917	SOUTH PEBBLE 159	S005S035W18	160
ADL 552918	SOUTH PEBBLE 160	S005S035W18	160
ADL 552919	SOUTH PEBBLE 161	S005S035W17	160
ADL 552920	SOUTH PEBBLE 162	S005S035W17	160
ADL 552921	SOUTH PEBBLE 163	S005S035W17	160
ADL 552922	SOUTH PEBBLE 164	S005S035W17	160
ADL 552923	SOUTH PEBBLE 165	S005S035W08	160
ADL 552924	SOUTH PEBBLE 166	S005S035W08	160
ADL 552925	SOUTH PEBBLE 167	S005S035W08	160
ADL 552926	SOUTH PEBBLE 168	S005S035W08	160
ADL 552927	SOUTH PEBBLE 169	S005S035W05	160
ADL 552928	SOUTH PEBBLE 170	S005S035W05	160
ADL 552929	SOUTH PEBBLE 171	S005S035W05	160
ADL 552930	SOUTH PEBBLE 172	S005S035W05	160
ADL 566247	PEBBLE BEACH 1936	S005S036W04	40
ADL 566248	PEBBLE BEACH 1937	S005S036W04	40
ADL 566249	PEBBLE BEACH 1938	S005S036W03	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 566250	PEBBLE BEACH 1939	S005S036W03	40
ADL 566251	PEBBLE BEACH 1940	S005S036W03	40
ADL 566252	PEBBLE BEACH 1941	S005S036W03	40
ADL 566287	PEBBLE BEACH 2036	S005S036W04	40
ADL 566288	PEBBLE BEACH 2037	S005S036W04	40
ADL 566289	PEBBLE BEACH 2038	S005S036W03	40
ADL 566290	PEBBLE BEACH 2039	S005S036W03	40
ADL 566291	PEBBLE BEACH 2040	S005S036W03	40
ADL 566292	PEBBLE BEACH 2041	S005S036W03	40
ADL 566327	PEBBLE BEACH 2136	S005S036W04	40
ADL 566328	PEBBLE BEACH 2137	S005S036W04	40
ADL 566329	PEBBLE BEACH 2138	S005S036W03	40
ADL 566330	PEBBLE BEACH 2139	S005S036W03	40
ADL 566331	PEBBLE BEACH 2140	S005S036W03	40
ADL 566332	PEBBLE BEACH 2141	S005S036W03	40
ADL 566367	PEBBLE BEACH 2236	S004S036W35	40
ADL 566368	PEBBLE BEACH 2237	S004S036W35	40
ADL 566369	PEBBLE BEACH 2238	S004S036W36	40
ADL 566370	PEBBLE BEACH 2239	S004S036W36	40
ADL 566371	PEBBLE BEACH 2240	S004S036W36	40
ADL 566372	PEBBLE BEACH 2241	S004S036W36	40
ADL 566373	PEBBLE BEACH 2242	S004S035W31	40
ADL 566407	PEBBLE BEACH 2336	S004S036W35	40
ADL 566408	PEBBLE BEACH 2337	S004S036W35	40
ADL 566409	PEBBLE BEACH 2338	S004S036W36	40
ADL 566410	PEBBLE BEACH 2339	S004S036W36	40
ADL 566411	PEBBLE BEACH 2340	S004S036W36	40
ADL 566412	PEBBLE BEACH 2341	S004S036W36	40
ADL 566413	PEBBLE BEACH 2342	S004S035W31	40
ADL 566447	PEBBLE BEACH 2436	S004S036W35	40
ADL 566448	PEBBLE BEACH 2437	S004S036W35	40
ADL 566449	PEBBLE BEACH 2438	S004S036W36	40
ADL 566450	PEBBLE BEACH 2439	S004S036W36	40
ADL 566451	PEBBLE BEACH 2440	S004S036W36	40
ADL 566452	PEBBLE BEACH 2441	S004S036W36	40
ADL 566453	PEBBLE BEACH 2442	S004S035W31	40
ADL 566487	PEBBLE BEACH 2536	S004S036W35	40
ADL 566488	PEBBLE BEACH 2537	S004S036W35	40
ADL 566489	PEBBLE BEACH 2538	S004S036W36	40
ADL 566490	PEBBLE BEACH 2539	S004S036W36	40
ADL 566491	PEBBLE BEACH 2540	S004S036W36	40
ADL 566492	PEBBLE BEACH 2541	S004S036W36	40
ADL 566527	PEBBLE BEACH 2636	S004S036W26	40
ADL 566528	PEBBLE BEACH 2637	S004S036W26	40
ADL 566529	PEBBLE BEACH 2638	S004S036W25	40
ADL 566530	PEBBLE BEACH 2639	S004S036W25	40
ADL 566531	PEBBLE BEACH 2640	S004S036W25	40
ADL 566532	PEBBLE BEACH 2641	S004S036W25	40
ADL 566567	PEBBLE BEACH 2736	S004S036W26	40
ADL 566568	PEBBLE BEACH 2737	S004S036W26	40
ADL 566569	PEBBLE BEACH 2738	S004S036W25	40
ADL 566570	PEBBLE BEACH 2739	S004S036W25	40
ADL 566571	PEBBLE BEACH 2740	S004S036W25	40
ADL 566572	PEBBLE BEACH 2741	S004S036W25	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 566607	PEBBLE BEACH 3138	S004S036W24	40
ADL 566608	PEBBLE BEACH 3139	S004S036W24	40
ADL 566609	PEBBLE BEACH 3140	S004S036W24	40
ADL 566610	PEBBLE BEACH 3141	S004S036W24	40
ADL 566637	PEBBLE BEACH 2938	S004S036W25	40
ADL 566638	PEBBLE BEACH 2939	S004S036W25	40
ADL 566639	PEBBLE BEACH 2940	S004S036W25	40
ADL 566640	PEBBLE BEACH 2941	S004S036W25	40
ADL 566655	PEBBLE BEACH 2836	S004S036W26	40
ADL 566656	PEBBLE BEACH 2837	S004S036W26	40
ADL 566657	PEBBLE BEACH 2838	S004S036W25	40
ADL 566658	PEBBLE BEACH 2839	S004S036W25	40
ADL 566659	PEBBLE BEACH 2840	S004S036W25	40
ADL 566660	PEBBLE BEACH 2841	S004S036W25	40
ADL 566697	PEBBLE BEACH 3238	S004S036W24	40
ADL 566698	PEBBLE BEACH 3239	S004S036W24	40
ADL 566699	PEBBLE BEACH 3240	S004S036W24	40
ADL 566700	PEBBLE BEACH 3241	S004S036W24	40
ADL 566701	PEBBLE BEACH 3242	S004S035W19	40
ADL 566737	PEBBLE BEACH 3038	S004S036W24	40
ADL 566738	PEBBLE BEACH 3039	S004S036W24	40
ADL 566739	PEBBLE BEACH 3040	S004S036W24	40
ADL 566740	PEBBLE BEACH 3041	S004S036W24	40
ADL 566751	PEBBLE BEACH 3252	S004S035W21	40
ADL 566752	PEBBLE BEACH 3253	S004S035W21	40
ADL 566753	PEBBLE BEACH 3254	S004S035W22	40
ADL 566754	PEBBLE BEACH 3255	S004S035W22	40
ADL 566767	PEBBLE BEACH 3338	S004S036W24	40
ADL 566768	PEBBLE BEACH 3339	S004S036W24	40
ADL 566769	PEBBLE BEACH 3340	S004S036W24	40
ADL 566770	PEBBLE BEACH 3341	S004S036W24	40
ADL 566771	PEBBLE BEACH 3342	S004S035W19	40
ADL 566781	PEBBLE BEACH 3352	S004S035W21	40
ADL 566782	PEBBLE BEACH 3353	S004S035W21	40
ADL 566783	PEBBLE BEACH 3354	S004S035W22	40
ADL 566784	PEBBLE BEACH 3355	S004S035W22	40
ADL 566793	PEBBLE BEACH 3438	S004S036W13	40
ADL 566794	PEBBLE BEACH 3439	S004S036W13	40
ADL 566795	PEBBLE BEACH 3440	S004S036W13	40
ADL 566796	PEBBLE BEACH 3441	S004S036W13	40
ADL 566797	PEBBLE BEACH 3446	S004S035W17	40
ADL 566798	PEBBLE BEACH 3447	S004S035W17	40
ADL 566799	PEBBLE BEACH 3448	S004S035W17	40
ADL 566800	PEBBLE BEACH 3449	S004S035W17	40
ADL 566801	PEBBLE BEACH 3450	S004S035W16	40
ADL 566802	PEBBLE BEACH 3451	S004S035W16	40
ADL 566811	PEBBLE BEACH 3538	S004S036W13	40
ADL 566812	PEBBLE BEACH 3539	S004S036W13	40
ADL 566813	PEBBLE BEACH 3540	S004S036W13	40
ADL 566814	PEBBLE BEACH 3541	S004S036W13	40
ADL 566815	PEBBLE BEACH 3546	S004S035W17	40
ADL 566816	PEBBLE BEACH 3547	S004S035W17	40
ADL 566817	PEBBLE BEACH 3548	S004S035W17	40
ADL 566818	PEBBLE BEACH 3549	S004S035W17	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 566819	PEBBLE BEACH 3550	S004S035W16	40
ADL 566820	PEBBLE BEACH 3551	S004S035W16	40
ADL 566829	PEBBLE BEACH 3638	S004S036W13	40
ADL 566830	PEBBLE BEACH 3639	S004S036W13	40
ADL 566831	PEBBLE BEACH 3640	S004S036W13	40
ADL 566832	PEBBLE BEACH 3641	S004S036W13	40
ADL 566833	PEBBLE BEACH 3646	S004S035W17	40
ADL 566834	PEBBLE BEACH 3647	S004S035W17	40
ADL 566835	PEBBLE BEACH 3648	S004S035W17	40
ADL 566836	PEBBLE BEACH 3649	S004S035W17	40
ADL 566837	PEBBLE BEACH 3650	S004S035W16	40
ADL 566838	PEBBLE BEACH 3651	S004S035W16	40
ADL 566847	PEBBLE BEACH 3738	S004S036W13	40
ADL 566848	PEBBLE BEACH 3739	S004S036W13	40
ADL 566849	PEBBLE BEACH 3740	S004S036W13	40
ADL 566850	PEBBLE BEACH 3741	S004S036W13	40
ADL 566851	PEBBLE BEACH 3746	S004S035W17	40
ADL 566852	PEBBLE BEACH 3747	S004S035W17	40
ADL 566853	PEBBLE BEACH 3748	S004S035W17	40
ADL 566854	PEBBLE BEACH 3749	S004S035W17	40
ADL 566855	PEBBLE BEACH 3750	S004S035W16	40
ADL 566856	PEBBLE BEACH 3751	S004S035W16	40
ADL 566865	PEBBLE BEACH 3838	S004S036W12	40
ADL 566866	PEBBLE BEACH 3839	S004S036W12	40
ADL 566867	PEBBLE BEACH 3840	S004S036W12	40
ADL 566868	PEBBLE BEACH 3841	S004S036W12	40
ADL 566877	PEBBLE BEACH 3938	S004S036W12	40
ADL 566878	PEBBLE BEACH 3939	S004S036W12	40
ADL 566879	PEBBLE BEACH 3940	S004S036W12	40
ADL 566880	PEBBLE BEACH 3941	S004S036W12	40
ADL 566889	PEBBLE BEACH 4038	S004S036W12	40
ADL 566890	PEBBLE BEACH 4039	S004S036W12	40
ADL 566891	PEBBLE BEACH 4040	S004S036W12	40
ADL 566892	PEBBLE BEACH 4041	S004S036W12	40
ADL 566901	PEBBLE BEACH 4138	S004S036W12	40
ADL 566902	PEBBLE BEACH 4139	S004S036W12	40
ADL 566903	PEBBLE BEACH 4140	S004S036W12	40
ADL 566904	PEBBLE BEACH 4141	S004S036W12	40
ADL 566905	PEBBLE BEACH 4238	S004S036W01	40
ADL 566906	PEBBLE BEACH 4239	S004S036W01	40
ADL 566907	PEBBLE BEACH 4240	S004S036W01	40
ADL 566908	PEBBLE BEACH 4241	S004S036W01	40
ADL 566909	PEBBLE BEACH 4242	S004S035W06	40
ADL 566910	PEBBLE BEACH 4243	S004S035W06	40
ADL 566911	PEBBLE BEACH 4338	S004S036W01	40
ADL 566912	PEBBLE BEACH 4339	S004S036W01	40
ADL 566913	PEBBLE BEACH 4340	S004S036W01	40
ADL 566914	PEBBLE BEACH 4341	S004S036W01	40
ADL 566915	PEBBLE BEACH 4342	S004S035W06	40
ADL 566916	PEBBLE BEACH 4343	S004S035W06	40
ADL 566917	PEBBLE BEACH 4438	S004S036W01	40
ADL 566918	PEBBLE BEACH 4439	S004S036W01	40
ADL 566919	PEBBLE BEACH 4440	S004S036W01	40
ADL 566920	PEBBLE BEACH 4441	S004S036W01	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 566921	PEBBLE BEACH 4442	S004S035W06	40
ADL 566922	PEBBLE BEACH 4443	S004S035W06	40
ADL 566923	PEBBLE BEACH 4538	S004S036W01	40
ADL 566924	PEBBLE BEACH 4539	S004S036W01	40
ADL 566925	PEBBLE BEACH 4540	S004S036W01	40
ADL 566926	PEBBLE BEACH 4541	S004S036W01	40
ADL 566927	PEBBLE BEACH 4542	S004S035W06	40
ADL 566928	PEBBLE BEACH 4543	S004S035W06	40
ADL 566929	PEBBLE BEACH 4638	S003S036W36	40
ADL 566930	PEBBLE BEACH 4639	S003S036W36	40
ADL 566931	PEBBLE BEACH 4640	S003S036W36	40
ADL 566932	PEBBLE BEACH 4641	S003S036W36	40
ADL 566933	PEBBLE BEACH 4738	S003S036W36	40
ADL 566934	PEBBLE BEACH 4739	S003S036W36	40
ADL 566935	PEBBLE BEACH 4740	S003S036W36	40
ADL 566936	PEBBLE BEACH 4741	S003S036W36	40
ADL 566937	PEBBLE BEACH 4838	S003S036W36	40
ADL 566938	PEBBLE BEACH 4839	S003S036W36	40
ADL 566939	PEBBLE BEACH 4840	S003S036W36	40
ADL 566940	PEBBLE BEACH 4841	S003S036W36	40
ADL 566941	PEBBLE BEACH 4938	S003S036W36	40
ADL 566942	PEBBLE BEACH 4939	S003S036W36	40
ADL 566943	PEBBLE BEACH 4940	S003S036W36	40
ADL 566944	PEBBLE BEACH 4941	S003S036W36	40
ADL 566945	PEBBLE BEACH 5038	S003S036W25	40
ADL 566946	PEBBLE BEACH 5039	S003S036W25	40
ADL 566947	PEBBLE BEACH 5040	S003S036W25	40
ADL No.	Claim Name	MTRS	Total Acres
ADL 516769	SILL 5951	S004S035W12	40
ADL 516770	SILL 5952	S004S035W12	40
ADL 516779	SILL 6051	S004S035W12	40
ADL 516780	SILL 6052	S004S035W12	40
ADL 516789	SILL 6151	S004S035W12	40
ADL 516790	SILL 6152	S004S035W12	40
ADL 516797	SILL 6247	S004S035W11	40
ADL 516798	SILL 6248	S004S035W11	40
ADL 516799	SILL 6249	S004S035W12	40
ADL 516800	SILL 6250	S004S035W12	40
ADL 516801	SILL 6251	S004S035W12	40
ADL 516802	SILL 6252	S004S035W12	40
ADL 516806	PEBBLE BEACH 5448	S003S035W20	40
ADL 516807	PEBBLE BEACH 5449	S003S035W20	40
ADL 516808	PEBBLE BEACH 5450	S003S035W21	40
ADL 516809	PEBBLE BEACH 5451	S003S035W21	40
ADL 516810	PEBBLE BEACH 5452	S003S035W21	40
ADL 516811	PEBBLE BEACH 5453	S003S035W21	40
ADL 516812	PEBBLE BEACH 5454	S003S035W22	40
ADL 516813	PEBBLE BEACH 5548	S003S035W20	40
ADL 516814	PEBBLE BEACH 5549	S003S035W20	40
ADL 516815	PEBBLE BEACH 5550	S003S035W21	40
ADL 516816	PEBBLE BEACH 5551	S003S035W21	40
ADL 516817	PEBBLE BEACH 5552	S003S035W21	40
ADL 516818	PEBBLE BEACH 5553	S003S035W21	40
ADL 516819	PEBBLE BEACH 5554	S003S035W22	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 566975	PEBBLE BEACH 5740	S003S036W24	40
ADL 566976	PEBBLE BEACH 5741	S003S036W24	40
ADL 566977	PEBBLE BEACH 5838	S003S036W13	40
ADL 566978	PEBBLE BEACH 5839	S003S036W13	40
ADL 566979	PEBBLE BEACH 5840	S003S036W13	40
ADL 566980	PEBBLE BEACH 5841	S003S036W13	40
ADL 566981	PEBBLE BEACH 5938	S003S036W13	40
ADL 566982	PEBBLE BEACH 5939	S003S036W13	40
ADL 566983	PEBBLE BEACH 5940	S003S036W13	40
ADL 566984	PEBBLE BEACH 5941	S003S036W13	40
ADL 566985	PEBBLE BEACH 6038	S003S036W13	40
ADL 566986	PEBBLE BEACH 6039	S003S036W13	40
ADL 566987	PEBBLE BEACH 6040	S003S036W13	40
ADL 566988	PEBBLE BEACH 6041	S003S036W13	40
ADL 566989	PEBBLE BEACH 6042	S003S035W18	40
ADL 566990	PEBBLE BEACH 6043	S003S035W18	40
ADL 566991	PEBBLE BEACH 6138	S003S036W13	40
ADL 566992	PEBBLE BEACH 6139	S003S036W13	40
ADL 566993	PEBBLE BEACH 6140	S003S036W13	40
ADL 566994	PEBBLE BEACH 6141	S003S036W13	40
ADL 566995	PEBBLE BEACH 6142	S003S035W18	40
ADL 566996	PEBBLE BEACH 6143	S003S035W18	40
ADL 566997	PEBBLE BEACH 6238	S003S036W12	40
ADL 566998	PEBBLE BEACH 6239	S003S036W12	40
ADL 566999	PEBBLE BEACH 6240	S003S036W12	40
ADL 567000	PEBBLE BEACH 6241	S003S036W12	40
ADL 567001	PEBBLE BEACH 6242	S003S035W07	40
ADL 567002	PEBBLE BEACH 6243	S003S035W07	40
ADL 567003	PEBBLE BEACH 6244	S003S035W07	40
ADL 567004	PEBBLE BEACH 6245	S003S035W07	40
ADL 567005	PEBBLE BEACH 6246	S003S035W08	40
ADL 567006	PEBBLE BEACH 6247	S003S035W08	40
ADL 567007	PEBBLE BEACH 6338	S003S036W12	40
ADL 567008	PEBBLE BEACH 6339	S003S036W12	40
ADL 567009	PEBBLE BEACH 6340	S003S036W12	40
ADL 567010	PEBBLE BEACH 6341	S003S036W12	40
ADL 567011	PEBBLE BEACH 6342	S003S035W07	40
ADL 567012	PEBBLE BEACH 6343	S003S035W07	40
ADL 567013	PEBBLE BEACH 6344	S003S035W07	40
ADL 567014	PEBBLE BEACH 6345	S003S035W07	40
ADL 567015	PEBBLE BEACH 6346	S003S035W08	40
ADL 567016	PEBBLE BEACH 6347	S003S035W08	40
ADL 567017	PEBBLE BEACH 6438	S003S036W12	40
ADL 567018	PEBBLE BEACH 6439	S003S036W12	40
ADL 567019	PEBBLE BEACH 6440	S003S036W12	40
ADL 567020	PEBBLE BEACH 6441	S003S036W12	40
ADL 567021	PEBBLE BEACH 6442	S003S035W07	40
ADL 567022	PEBBLE BEACH 6443	S003S035W07	40
ADL 567023	PEBBLE BEACH 6444	S003S035W07	40
ADL 567024	PEBBLE BEACH 6445	S003S035W07	40
ADL 567025	PEBBLE BEACH 6446	S003S035W08	40
ADL 567026	PEBBLE BEACH 6447	S003S035W08	40
ADL 567035	PEBBLE BEACH 6546	S003S035W08	40
ADL 567036	PEBBLE BEACH 6547	S003S035W08	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 567045	PEBBLE BEACH 6646	S003S035W05	40
ADL 567046	PEBBLE BEACH 6647	S003S035W05	40
ADL 567047	PEBBLE BEACH 6648	S003S035W05	40
ADL 567048	PEBBLE BEACH 6649	S003S035W05	40
ADL 567049	PEBBLE BEACH 6650	S003S035W04	40
ADL 567050	PEBBLE BEACH 6651	S003S035W04	40
ADL 567051	PEBBLE BEACH 6652	S003S035W04	40
ADL 567052	PEBBLE BEACH 6653	S003S035W04	40
ADL 567053	PEBBLE BEACH 6654	S003S035W03	40
ADL 567054	PEBBLE BEACH 6655	S003S035W03	40
ADL 567055	PEBBLE BEACH 6656	S003S035W03	4
ADL 567064	PEBBLE BEACH 6746	S003S035W05	40
ADL 567065	PEBBLE BEACH 6747	S003S035W05	40
ADL 567066	PEBBLE BEACH 6748	S003S035W05	40
ADL 567067	PEBBLE BEACH 6749	S003S035W05	40
ADL 567068	PEBBLE BEACH 6750	S003S035W04	40
ADL 567069	PEBBLE BEACH 6751	S003S035W04	40
ADL 567083	PEBBLE BEACH 6846	S003S035W05	40
ADL 567084	PEBBLE BEACH 6847	S003S035W05	40
ADL 567085	PEBBLE BEACH 6848	S003S035W05	40
ADL 567086	PEBBLE BEACH 6849	S003S035W05	40
ADL 567087	PEBBLE BEACH 6850	S003S035W04	40
ADL 567088	PEBBLE BEACH 6851	S003S035W04	40
ADL 567102	PEBBLE BEACH 6946	S003S035W05	40
ADL 567103	PEBBLE BEACH 6947	S003S035W05	40
ADL 567104	PEBBLE BEACH 6948	S003S035W05	40
ADL 567105	PEBBLE BEACH 6949	S003S035W05	40
ADL 567106	PEBBLE BEACH 6950	S003S035W04	40
ADL 567107	PEBBLE BEACH 6951	S003S035W04	40
ADL 567841	SILL 5343	S004S035W22	40
ADL 567842	SILL 5344	S004S035W22	40
ADL 567843	SILL 5345	S004S035W23	40
ADL 567844	SILL 5346	S004S035W23	40
ADL 567845	SILL 5347	S004S035W23	40
ADL 567855	SILL 5443	S004S035W22	40
ADL 567856	SILL 5444	S004S035W22	40
ADL 567857	SILL 5445	S004S035W23	40
ADL 567858	SILL 5446	S004S035W23	40
ADL 567859	SILL 5447	S004S035W23	40
ADL 567860	SILL 5448	S004S035W23	40
ADL 567869	SILL 5545	S004S035W14	40
ADL 567870	SILL 5546	S004S035W14	40
ADL 567871	SILL 5547	S004S035W14	40
ADL 567872	SILL 5548	S004S035W14	40
ADL 567873	SILL 5549	S004S035W13	40
ADL 567881	SILL 5645	S004S035W14	40
ADL 567882	SILL 5646	S004S035W14	40
ADL 567883	SILL 5647	S004S035W14	40
ADL 567884	SILL 5648	S004S035W14	40
ADL 567885	SILL 5649	S004S035W13	40
ADL 567886	SILL 5650	S004S035W13	40
ADL 567893	SILL 5745	S004S035W14	40
ADL 567894	SILL 5746	S004S035W14	40
ADL 567895	SILL 5747	S004S035W14	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 567896	SILL 5748	S004S035W14	40
ADL 567897	SILL 5749	S004S035W13	40
ADL 567898	SILL 5750	S004S035W13	40
ADL 567905	SILL 5845	S004S035W14	40
ADL 567906	SILL 5846	S004S035W14	40
ADL 567907	SILL 5847	S004S035W14	40
ADL 567908	SILL 5848	S004S035W14	40
ADL 567909	SILL 5849	S004S035W13	40
ADL 567910	SILL 5850	S004S035W13	40
ADL 567911	SILL 5851	S004S035W13	40
ADL 567917	SILL 5945	S004S035W11	40
ADL 567918	SILL 5946	S004S035W11	40
ADL 567919	SILL 5947	S004S035W11	40
ADL 567920	SILL 5948	S004S035W11	40
ADL 567921	SILL 5949	S004S035W12	40
ADL 567922	SILL 5950	S004S035W12	40
ADL 567923	SILL 5953	S004S034W07	40
ADL 567927	SILL 6045	S004S035W11	40
ADL 567928	SILL 6046	S004S035W11	40
ADL 567929	SILL 6047	S004S035W11	40
ADL 567930	SILL 6048	S004S035W11	40
ADL 567931	SILL 6049	S004S035W12	40
ADL 567932	SILL 6050	S004S035W12	40
ADL 567933	SILL 6053	S004S034W07	40
ADL 567937	SILL 6145	S004S035W11	40
ADL 567938	SILL 6146	S004S035W11	40
ADL 567939	SILL 6147	S004S035W11	40
ADL 567940	SILL 6148	S004S035W11	40
ADL 567941	SILL 6149	S004S035W12	40
ADL 567942	SILL 6150	S004S035W12	40
ADL 567943	SILL 6153	S004S034W07	40
ADL 567944	SILL 6154	S004S034W07	40
ADL 567947	SILL 6253	S004S034W07	40
ADL 567948	SILL 6254	S004S034W07	40
ADL 567949	SILL 6255	S004S034W07	40
ADL 567951	SILL 6345	S004S035W02	40
ADL 567952	SILL 6346	S004S035W02	40
ADL 567953	SILL 6347	S004S035W02	40
ADL 567954	SILL 6348	S004S035W02	40
ADL 567955	SILL 6349	S004S035W01	40
ADL 567956	SILL 6350	S004S035W01	40
ADL 567957	SILL 6353	S004S034W06	40
ADL 567958	SILL 6354	S004S034W06	40
ADL 567959	SILL 6355	S004S034W06	40
ADL 567960	SILL 6356	S004S034W06	40
ADL 567961	SILL 6445	S004S035W02	40
ADL 567962	SILL 6446	S004S035W02	40
ADL 567963	SILL 6447	S004S035W02	40
ADL 567964	SILL 6448	S004S035W02	40
ADL 567965	SILL 6449	S004S035W01	40
ADL 567966	SILL 6450	S004S035W01	40
ADL 567967	SILL 6453	S004S034W06	40
ADL 567968	SILL 6454	S004S034W06	40
ADL 567969	SILL 6455	S004S034W06	40

ADL No.	Claim Name	MTRS	Total Acres
ADL 567970	SILL 6456	S004S034W06	40
ADL 567971	SILL 6545	S004S035W02	40
ADL 567972	SILL 6546	S004S035W02	40
ADL 567973	SILL 6547	S004S035W02	40
ADL 567974	SILL 6548	S004S035W02	40
ADL 567975	SILL 6549	S004S035W01	40
ADL 567976	SILL 6550	S004S035W01	40
ADL 567977	SILL 6551	S004S035W01	40
ADL 567978	SILL 6552	S004S035W01	40
ADL 567979	SILL 6553	S004S034W06	40
ADL 567980	SILL 6554	S004S034W06	40
ADL 567981	SILL 6555	S004S034W06	40
ADL 567982	SILL 6556	S004S034W06	40
ADL 568175	SILL 8345	S003S035W11	40
ADL 568176	SILL 8346	S003S035W11	40
ADL 568177	SILL 8347	S003S035W11	40
ADL 568178	SILL 8348	S003S035W11	40
ADL 568255	SILL 8743	S003S035W03	40
ADL 568256	SILL 8744	S003S035W03	40
ADL 644284	SP 173	S005S035W09	160
ADL 644285	SP 174	S005S035W09	160
ADL 644286	SP 175	S005S035W09	160
ADL 644287	SP 176	S005S035W09	160
ADL 644288	SP 177	S005S035W03	160
ADL 644289	SP 178	S005S035W03	160
ADL 644290	SP 179	S005S035W04	160
ADL 644291	SP 180	S005S035W04	160
ADL 644292	SP 181	S005S035W04	160
ADL 644293	SP 182	S005S035W04	160
ADL 644294	SP 183	S005S035W03	160
ADL 644295	SP 184	S005S035W03	160
ADL 644296	SP 185	S004S035W36	160
ADL 644297	SP 186	S004S035W36	160
ADL 644298	SP 187	S004S035W35	160
ADL 644299	SP 188	S004S035W35	160
ADL 644300	SP 189	S004S035W35	160
ADL 644301	SP 190	S004S035W36	160
ADL 644302	SP 191	S005S035W07	160
ADL 644303	SP 192	S005S035W07	160
ADL 644312	SP 201	S005S035W07	160
ADL 644313	SP 202	S005S035W07	160
ADL 644314	SP 203	S005S035W18	160
ADL 644315	SP 204	S005S035W18	160
ADL 644318	SP 207	S004S035W36	160
ADL 644319	SP 208	S004S035W25	160
ADL 644320	SP 209	S004S035W25	160
ADL 644321	SP 210	S004S035W25	160
ADL 644322	SP 216	S004S035W25	160
ADL 644323	SP 225	S004S035W24	160
ADL 644324	SP 226	S004S035W24	160
ADL 644325	SP 227	S004S034W19	160
ADL 644326	SP 228	S004S034W19	160
ADL 644327	SP 229	S004S034W19	160
ADL 644328	SP 230	S004S034W19	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 644329	SP 231	S004S035W24	160
ADL 644330	SP 232	S004S035W24	160
ADL 644331	SP 235	S004S035W13	160
ADL 644332	SP 236	S004S034W18	160
ADL 644333	SP 237	S004S034W18	160
ADL 644334	SP 238	S004S034W18	160
ADL 644335	SP 239	S004S034W18	160
ADL 644336	SP 245	S004S034W07	160
ADL 644733	SOUTH PEBBLE 234	S004S035W13	40
ADL 644734	SOUTH PEBBLE 240	S004S035W13	40
ADL 644735	SOUTH PEBBLE 241	S004S035W13	40
ADL 644736	SOUTH PEBBLE 242	S004S035W13	40
ADL 644737	SOUTH PEBBLE 243	S004S034W07	40
ADL 644738	SOUTH PEBBLE 244	S004S034W07	40
ADL 645612	SP 322	S004S034W08	160
ADL 645613	SP 323	S004S034W08	160
ADL 645614	SP 324	S004S034W05	160
ADL 645615	SP 325	S004S034W05	160
ADL 645616	SP 326	S004S034W05	160
ADL 645617	SP 327	S004S034W04	160
ADL 645618	SP 328	S004S034W04	160
ADL 645619	SP 329	S004S034W03	160
ADL 645620	SP 330	S004S034W03	160
ADL 645621	SP 331	S003S034W35	160
ADL 645622	SP 332	S003S034W34	160
ADL 645623	SP 333	S003S034W34	160
ADL 645624	SP 334	S003S034W34	160
ADL 645625	SP 335	S003S034W34	160
ADL 645626	SP 336	S003S034W35	160
ADL 645627	SP 337	S003S034W25	160
ADL 645628	SP 338	S003S034W25	160
ADL 645629	SP 339	S003S034W26	160
ADL 645630	SP 340	S003S034W26	160
ADL 645631	SP 341	S003S034W27	160
ADL 645632	SP 342	S003S034W27	160
ADL 645633	SP 343	S003S034W27	160
ADL 645634	SP 344	S003S034W27	160
ADL 645635	SP 345	S003S034W26	160
ADL 645636	SP 346	S003S034W26	160
ADL 645637	SP 347	S003S034W25	160
ADL 645638	SP 348	S003S034W25	160
ADL 645639	SP 349	S003S034W24	160
ADL 645640	SP 350	S003S034W24	160
ADL 645641	SP 351	S003S034W23	160
ADL 645642	SP 352	S003S034W23	160
ADL 645643	SP 353	S003S034W22	160
ADL 645644	SP 354	S003S034W22	160
ADL 645645	SP 355	S003S034W22	160
ADL 645646	SP 356	S003S034W22	160
ADL 645647	SP 357	S003S034W23	160
ADL 645648	SP 358	S003S034W23	160
ADL 645649	SP 359	S003S034W24	160
ADL 645650	SP 360	S003S034W24	160
ADL 645651	SP 361	S003S034W13	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 645652	SP 362	S003S034W13	160
ADL 645653	SP 363	S003S034W14	160
ADL 645654	SP 364	S003S034W14	160
ADL 645655	SP 365	S003S034W15	160
ADL 645656	SP 366	S003S034W15	160
ADL 645657	SP 367	S003S034W15	160
ADL 645658	SP 368	S003S034W15	160
ADL 645659	SP 369	S003S034W14	160
ADL 645660	SP 370	S003S034W14	160
ADL 645661	SP 371	S003S034W13	160
ADL 645662	SP 372	S003S034W13	160

Mineral Claims
Pebble West Claims Corp.
3201 C Street, Suite 602
Anchorage, AK 99503

ADL No.	Claim Name	MTRS	Total Acres
ADL 642753	BC 265	S003S038W22	160
ADL 642754	BC 266	S003S038W23	160
ADL 642755	BC 267	S003S038W23	160
ADL 642756	BC 268	S003S038W24	160
ADL 642757	BC 269	S003S038W24	160
ADL 642758	BC 270	S003S037W19	160
ADL 642759	BC 271	S003S037W19	160
ADL 642764	BC 276	S003S038W22	160
ADL 642765	BC 277	S003S038W23	160
ADL 642766	BC 278	S003S038W23	160
ADL 642767	BC 279	S003S038W24	160
ADL 642768	BC 280	S003S038W24	160
ADL 642769	BC 281	S003S037W19	160
ADL 642770	BC 282	S003S037W19	160
ADL 642775	BC 287	S003S038W15	160
ADL 642776	BC 288	S003S038W14	160
ADL 642777	BC 289	S003S038W14	160
ADL 642778	BC 290	S003S038W13	160
ADL 642779	BC 291	S003S038W13	160
ADL 642780	BC 292	S003S037W18	160
ADL 642781	BC 293	S003S037W18	160
ADL 642786	BC 298	S003S038W15	160
ADL 642787	BC 299	S003S038W14	160
ADL 642788	BC 300	S003S038W14	160
ADL 642789	BC 301	S003S038W13	160
ADL 642790	BC 302	S003S038W13	160
ADL 642791	BC 303	S003S037W18	160
ADL 642792	BC 304	S003S037W18	160
ADL 642797	BC 309	S003S038W10	160
ADL 642798	BC 310	S003S038W11	160
ADL 642799	BC 311	S003S038W11	160
ADL 642800	BC 312	S003S038W12	160
ADL 642801	BC 313	S003S038W12	160
ADL 642802	BC 314	S003S037W07	160
ADL 642803	BC 315	S003S037W07	160
ADL 642808	BC 320	S003S038W10	160
ADL 642809	BC 321	S003S038W11	160
ADL 642810	BC 322	S003S038W11	160
ADL 642811	BC 323	S003S038W12	160
ADL 642812	BC 324	S003S038W12	160
ADL 642813	BC 325	S003S037W07	160
ADL 642814	BC 326	S003S037W07	160
ADL 642819	BC 331	S003S038W03	160
ADL 642820	BC 332	S003S038W02	160
ADL 642821	BC 333	S003S038W02	160
ADL 642822	BC 334	S003S038W01	160
ADL 642823	BC 335	S003S038W01	160
ADL 642824	BC 336	S003S037W06	160
ADL 642825	BC 337	S003S037W06	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 642826	BC 338	S003S035W06	160
ADL 642827	BC 339	S003S035W06	160
ADL 642832	BC 344	S003S038W03	160
ADL 642833	BC 345	S003S038W02	160
ADL 642834	BC 346	S003S038W02	160
ADL 642835	BC 347	S003S038W01	160
ADL 642836	BC 348	S003S038W01	160
ADL 642837	BC 349	S003S037W06	160
ADL 642838	BC 350	S003S037W06	160
ADL 642839	BC 351	S003S035W06	160
ADL 642840	BC 352	S003S035W06	160
ADL 642841	BC 353	S003S035W04	160
ADL 642842	BC 354	S003S035W03	160
ADL 642843	BC 355	S003S035W03	160
ADL 642848	BC 360	S002S038W34	160
ADL 642849	BC 361	S002S038W35	160
ADL 642850	BC 362	S002S038W35	160
ADL 642851	BC 363	S002S038W36	160
ADL 642852	BC 364	S002S038W36	160
ADL 642853	BC 365	S002S037W31	160
ADL 642854	BC 366	S002S037W31	160
ADL 642855	BC 367	S002S035W31	160
ADL 642856	BC 368	S002S035W31	160
ADL 642857	BC 369	S002S035W32	160
ADL 642858	BC 370	S002S035W32	160
ADL 642859	BC 371	S002S035W33	160
ADL 642860	BC 372	S002S035W33	160
ADL 642861	BC 373	S002S035W34	160
ADL 642862	BC 374	S002S035W34	160
ADL 642867	BC 379	S002S038W34	160
ADL 642868	BC 380	S002S038W35	160
ADL 642869	BC 381	S002S038W35	160
ADL 642870	BC 382	S002S038W36	160
ADL 642871	BC 383	S002S038W36	160
ADL 642872	BC 384	S002S037W31	160
ADL 642873	BC 385	S002S037W31	160
ADL 642874	BC 386	S002S035W31	160
ADL 642875	BC 387	S002S035W31	160
ADL 642876	BC 388	S002S035W32	160
ADL 642877	BC 389	S002S035W32	160
ADL 642878	BC 390	S002S035W33	160
ADL 642879	BC 391	S002S035W33	160
ADL 642880	BC 392	S002S035W34	160
ADL 642881	BC 393	S002S035W34	160
ADL 642886	BC 398	S002S038W27	160
ADL 642887	BC 399	S002S038W26	160
ADL 642888	BC 400	S002S038W26	160
ADL 642889	BC 401	S002S038W25	160
ADL 642890	BC 402	S002S038W25	160
ADL 642891	BC 403	S002S037W30	160
ADL 642892	BC 404	S002S037W30	160
ADL 642893	BC 405	S002S035W30	160
ADL 642894	BC 406	S002S035W30	160
ADL 642895	BC 407	S002S035W29	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 642896	BC 408	S002S035W29	160
ADL 642897	BC 409	S002S035W28	160
ADL 642898	BC 410	S002S035W28	160
ADL 642899	BC 411	S002S035W27	160
ADL 642900	BC 412	S002S035W27	160
ADL 642905	BC 417	S002S038W27	160
ADL 642906	BC 418	S002S038W26	160
ADL 642907	BC 419	S002S038W26	160
ADL 642908	BC 420	S002S038W25	160
ADL 642909	BC 421	S002S038W25	160
ADL 642910	BC 422	S002S037W30	160
ADL 642911	BC 423	S002S037W30	160
ADL 642912	BC 424	S002S035W30	160
ADL 642913	BC 425	S002S035W30	160
ADL 642914	BC 426	S002S035W29	160
ADL 642915	BC 427	S002S035W29	160
ADL 642916	BC 428	S002S035W28	160
ADL 642917	BC 429	S002S035W28	160
ADL 642918	BC 430	S002S035W27	160
ADL 642919	BC 431	S002S035W27	160
ADL 642924	BC 436	S002S038W22	160
ADL 642925	BC 437	S002S038W23	160
ADL 642926	BC 438	S002S038W23	160
ADL 642927	BC 439	S002S038W24	160
ADL 642928	BC 440	S002S038W24	160
ADL 642929	BC 441	S002S037W19	160
ADL 642930	BC 442	S002S037W19	160
ADL 642931	BC 443	S002S037W20	160
ADL 642932	BC 444	S002S035W19	160
ADL 642933	BC 445	S002S035W19	160
ADL 642934	BC 446	S002S035W20	160
ADL 642935	BC 447	S002S035W20	160
ADL 642936	BC 448	S002S035W21	160
ADL 642937	BC 449	S002S035W21	160
ADL 642938	BC 450	S002S035W22	160
ADL 642939	BC 451	S002S035W22	160
ADL 642944	BC 456	S002S038W22	160
ADL 642945	BC 457	S002S038W23	160
ADL 642946	BC 458	S002S038W23	160
ADL 642947	BC 459	S002S038W24	160
ADL 642948	BC 460	S002S038W24	160
ADL 642949	BC 461	S002S037W19	160
ADL 642950	BC 462	S002S037W19	160
ADL 642951	BC 463	S002S037W20	160
ADL 642952	BC 464	S002S037W20	160
ADL 642953	BC 465	S002S035W19	160
ADL 642954	BC 466	S002S035W19	160
ADL 642955	BC 467	S002S035W20	160
ADL 642956	BC 468	S002S035W20	160
ADL 642957	BC 469	S002S035W21	160
ADL 642958	BC 470	S002S035W21	160
ADL 642959	BC 471	S002S035W22	160
ADL 642960	BC 472	S002S035W22	160
ADL 642964	BC 476	S002S038W15	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 642965	BC 477	S002S038W14	160
ADL 642966	BC 478	S002S038W14	160
ADL 642967	BC 479	S002S038W13	160
ADL 642968	BC 480	S002S038W13	160
ADL 642969	BC 481	S002S037W18	160
ADL 642970	BC 482	S002S037W18	160
ADL 642971	BC 483	S002S037W17	160
ADL 642972	BC 484	S002S037W17	160
ADL 642973	BC 485	S002S037W16	160
ADL 642974	BC 486	S002S037W16	160
ADL 642975	BC 487	S002S037W15	160
ADL 642976	BC 488	S002S035W18	160
ADL 642977	BC 489	S002S035W18	160
ADL 642978	BC 490	S002S035W17	160
ADL 642979	BC 491	S002S035W17	160
ADL 642980	BC 492	S002S035W16	160
ADL 642981	BC 493	S002S035W16	160
ADL 642982	BC 494	S002S035W15	160
ADL 642983	BC 495	S002S035W15	160
ADL 642987	BC 499	S002S038W15	160
ADL 642988	BC 500	S002S038W14	160
ADL 642989	BC 501	S002S038W14	160
ADL 642990	BC 502	S002S038W13	160
ADL 642991	BC 503	S002S038W13	160
ADL 642992	BC 504	S002S037W18	160
ADL 642993	BC 505	S002S037W18	160
ADL 642994	BC 506	S002S037W17	160
ADL 642995	BC 507	S002S037W17	160
ADL 642996	BC 508	S002S037W16	160
ADL 642997	BC 509	S002S037W16	160
ADL 642998	BC 510	S002S037W15	160
ADL 642999	BC 511	S002S035W18	160
ADL 643000	BC 512	S002S035W18	160
ADL 643001	BC 513	S002S035W17	160
ADL 643002	BC 514	S002S035W17	160
ADL 643003	BC 515	S002S035W16	160
ADL 643004	BC 516	S002S035W16	160
ADL 643005	BC 517	S002S035W15	160
ADL 643006	BC 518	S002S035W15	160
ADL 643432	BC 1001	S003S035W07	40
ADL 643433	BC 1002	S003S035W07	40
ADL 643434	BC 1003	S003S035W07	40
ADL 643435	BC 1004	S003S035W07	40
ADL 643436	BC 1005	S003S035W04	40
ADL 643437	BC 1006	S003S035W04	40
ADL 643438	BC 1007	S003S035W03	40
ADL 643439	BC 1008	S003S035W03	40
ADL 643440	BC 1009	S003S035W03	40
ADL 643441	BC 1010	S003S035W03	40
ADL 649923	BC 1171	S002S037W15	160
ADL 649924	BC 1172	S002S037W14	160
ADL 649925	BC 1173	S002S037W14	160
ADL 649926	BC 1174	S002S037W13	160
ADL 649927	BC 1175	S002S037W13	160

ADL No.	Claim Name	MTRS	Total Acres
ADL 649928	BC 1176	S002S037W15	160
ADL 649929	BC 1177	S002S037W14	160
ADL 649930	BC 1178	S002S037W14	160
ADL 649931	BC1179	S002S037W13	160
ADL 649932	BC1180	S002S037W13	160
ADL 649939	BC1187	S002S037W24	160
ADL 649940	BC1188	S002S037W24	160
ADL 649948	BC1196	S002S037W24	160
ADL 649949	BC1197	S002S037W24	160



APMA A20186118 - Adjudication Summary

1. Requested Land Use and Proposed Activity Description:

Pebble Limited Partnership (PLP) is proposing a 5-year helicopter supported drill program composed of sixty-one (61) geotechnical boreholes, nineteen (19) diamond-drilled core boreholes, minor repair to existing installations, reactivation of the Acid Rock Drainage (ARD) test site and routine inspection. Activity proposed is scheduled to commence on or around May 1 and continue through the 2018 calendar year. Proposed activities will collect critical information for future development planning as well as resource modeling. According to the application, proposed activities in years 2-5 of the permit application would be described in an amended operation plan for approval as information becomes available and in advance of commencing work. DNR has decided that a permit of a single year is appropriate. Snow machine use may occur near field facilities when snow cover is sufficient for travel. The department notes that any application is conditioned on performance of reclamation in accordance with permit stipulations.

Proposed Surface Occupancy:

PLP requests authorization to maintain consolidated field facilities year-round serving as a re-supply station, staging and storage infrastructure, data collection locations and emergency shelters. Small quantities of drilling fluids, motor oils and antifreeze are also stored on site in all-weather structures. All structures are temporary in construction and on elevated platforms above the ground surface. All employees will be flown into and out of the worksite daily. During drilling activity, an emergency weather-port type structure will be erected temporarily at each work site in addition to a staffed medical tent and outhouse. Solid debris will be backhauled and disposed of at an approved waste disposal facility.

Fuel Transport/Storage:

PLP requests authorization to store and transport gasoline and aviation fuel to support field operations. The operator proposes to stage approximately 1,200 gallons of Jet A fuel at the Main Supply Depot for helicopter refueling. A maximum of 600 gallons of gasoline will be staged at drilling sites to support a 24-hour period of drilling, at which time they will be replaced or refueled as needed. The applicant states the fuel tanks will be removed at the cessation of drilling activity. Appropriate spill response supplies will be housed at each activity site.

Drilling Activity:

Sonic drill methodology is proposed for up to 61 geotechnical boreholes with diameters of two to eight inches and ranging an estimated 100-200 feet deep. Borehole samples will be bagged and removed from site. Small amounts of water may be required for drilling or grouting.

Diamond core drilling is also proposed for up to 19 sites. Anticipated drillhole¹ diameters range from 2.5-5 inches with depths up to 2,000 feet. Drill water will be required for diamond core drilling. Drill cuttings and recycle water will be settled and buried below ground surface in a sump². Excess sump water may be dispersed to uplands away from wetlands and surface water and will be monitored and relocated as necessary. The applicant proposes a full completion³ for each drill hole. Where full completion is not possible, the applicant proposes to use at least minimum standards set out in AS 27.19 and 11 AAC 97.

Acreege Disturbance and Reclamation:

The applicant proposes an exploration-related disturbance amount of 0.37 acres. All exploration-related disturbances are scheduled for reclamation at the cessation of the activity.

Refuse debris will be collected and removed from site. Surface disturbances will be recontoured and stabilized to prevent erosion and revegetation. Reseeding efforts using an approved seed mix may be used on a case by case basis.

Water, Fish, Wildlife, Wetlands and Cultural Surveying:

Water use, fish and habitat mitigation, wildlife mitigation, wetlands impact and cultural resources are managed and regulated by the following agencies:

Department of Natural Resources, Division of Mining, Land & Water, Water Section

Department of Fish and Game, Habitat Division

U.S. Army Corps of Engineers

Department of Natural Resources, Office of History and Archeology

Division of Mining Land & Water (DMLW) proposes the following:

A Miscellaneous Land Use Permit is the most commonly used vehicle for authorizing exploration activity on State Mining Claims (AS 38.05.850). DNR has adjudicated the application under 11 AAC 96 (Miscellaneous Land Use).

Separate authorization from the DNR Water Section, ADFG Habitat Division and ADEC may be required.

2. Relevant Statutory Authorities

AS 38.05.020 Authority and Duties of the Commissioner

AS 38.05.035 Powers and Duties of the Director

AS 38.05.255 Surface Use of Land or Water

AS 38.05.850 Permits

¹ A drillhole means a hole made by drilling, coring or boring, but excludes sampling and coring using hand held equipment and petroleum wells. The term is generally interchangeable with "borehole", and is used as the preferred nomenclature to be inclusive of all mineral drillholes, exclusive of petroleum wells.

² Ground up rock material is transported to the surface by the returning drilling fluids during drilling and is separated from the fluids in an inground basin, called a sump or sump pit.

³ "Full completion" refers to the complete filling, from bottom to top, with a competent material plug such as bentonite clay or similar. Full completion is the State's preferred completion methodology but not required by Statute or Regulation.

AS 27.19 Reclamation

3. Relevant Regulatory Authorities

- 11 AAC 96 Miscellaneous Land Use
- 11 AAC 97 Mining Reclamation
- 11 AAC 86 Mining Rights

4. Proposed Permit Area Location Information

- a. **Geographic Location:** Approximately 16 miles northwest of the community of Iliamna, Alaska, covering USGS Topographic maps Iliamna C-7, C-8, D-6, D-7, D-8, Seward Meridian.
- b. **Legal Description:** See Application Attachment Table 2A and encompassing all or portions of Township 2-7 South, Ranges 33-39 West, Seward Meridian.
 - i. **Main Supply Depot including Westbay 4:** Encompassing approximately 2.5 acres within ADL 516811 (S003S035W21) and ADL 516874 (S003S035W28)
 - ii. **Watershed:** ADL 524712 (S003S035W22)
 - iii. **Westbay 1:** ADL 524714 (S003S035W23)
 - iv. **Westbay 3:** ADL 642412 (S003S036W33)
 - v. **ARD Test Site:** ADL 524713 (S003S035W22)
 - vi. **Pebble 1 Met Station:** ADL 524829 (S003S035W20)
 - vii. **Koktuli Mountain Repeater:** ADL 646608 (S003S035W36)

5. Land Status Information

The requested activities lie within State of Alaska Mining Claims and State of Alaska Leasehold Locations (See MLUP A20186118 Appendix 1).

Interests within or near the sections listed above: These interests are identified in Alaska's Land Administration System and Alaska Mapper both available online at <http://dnr.alaska.gov/mlw/index.htm>

Mineral Closing Orders

MCO 393 – Mineral Closing Order

Leasehold Location Order

LLO 01 – Leasehold Location Order 1

Municipal Selection

ADL 227015 – Lake and Peninsula Borough Municipal Entitlement Selection

Permit or Lease

LAS 29599 – IRIS Incorporated Research Institutions for Seismology (MLUP)

Land Agreements, Settlements, Conveyances, Reconveyances and Municipal Entitlements of land: No authorization should be granted to access or use non-state lands.

Other Land Information

- Local Government: Lake & Peninsula Borough
- Regional Corporation: Bristol Bay Native Corporation

- Village Corporation: Alaska Peninsula Corporation
- Surrounding Organizations: Bristol Bay Native Association, City of Newhalen, Newhalen Tribal Council, Iliamna Tribal Council, Iliamna Village Council, City of Nondalton, Nondalton Tribal Council
- Surrounding Federally Recognized Tribe(s): Newhalen Village, Village of Iliamna, Nondalton Village
- School Trust Land: N/A
- Legislatively Designated Area: N/A
- Special Use Designations: N/A

Description of activities is consistent with the management provisions of the Bristol Bay Area Plan, SC-04-002 and SC-04-002A02, for the following regions:

Bristol Bay Area Plan, Region 06-05: Subunit Description: RRMP 19 (Map Reference 3-6/Table 6, Appendix by Reference)

- Designation: General Use
- Classification: Resource Management Land
- Prohibited Uses: Use must be consistent with management intents of Chapter 2, BBAP.
- Management Intent: Manage for a variety of uses (fish and wildlife resources, habitat land, mineral exploration and development, and recreation). Special considerations should be given to caribou and moose wintering, calving, and rutting areas.

Chapter 2: Fish and Wildlife Habitat and Harvest Areas, Management Guideline K: Caribou and Moose Calving and Rutting Areas: Consult with the Alaska Department of Fish and Game to ensure activities proposed are mitigated for acoustical disturbance in areas of caribou and moose wintering and calving activity.

Chapter 2: Recreation, Tourism, and Scenic Resources, Management Guideline J: Nushagak & Mulchatna Rivers Recreation Management Plan (RRMP)⁴: RRMP Unit 19 (BBAP Unit 06-05) Lower Mulchatna Uplands – Management Intent is semi-primitive. Permanent and Temporary Facilities may be allowed, however, does not apply to mining or other forms of subsurface use.

Bristol Bay Area Plan, Region 06-16: Subunit Description: Upper Chulitna Area (Map Reference 3-6 /Table 6, Appendix by Reference)

- Designation: General Use
- Classification: Resource Management Land
- Prohibited Uses: Use must be consistent with management intents of Chapter 2, BBAP.
- Management Intent: Manage for a variety of uses (fish and wildlife resources, habitat land, mineral exploration and development, and recreation). Special considerations should be given to caribou wintering areas.

⁴ The Revised Nushagak & Mulchatna Rivers Recreation Management Plan does not apply to areas designated Settlement and Mining in the BBAP, and it does not affect decisions related to municipal entitlement selections, mining or other forms of subsurface use, or oil and gas development (BBAP p.2-55).

Bristol Bay Area Plan, Region 06-23: Subunit Description: Pebble (Map Reference 3-6/Table 6, Appendix by Reference)

- Designation: Minerals
- Classification: Mineral Land
- Prohibited Uses: Permanent facilities related to commercial recreation are prohibited in this unit⁵.
- Management Intent: General resource management intent for this area is to consider mineral exploration and development allowing DNR the discretion to make specific decisions as to how development may occur, through the authorization process.⁶

Habitat resources of the two stream corridors that traverse this unit are to be protected (refer to Region 06-24).

Bristol Bay Area Plan, Subunit 06-24: Subunit Description: Pebble Streams (Map Reference 3-6/Table 6, Appendix by Reference)

- Designation: Minerals
- Classification: Mineral Land
- Prohibited Uses: Mineral entry and location within MCO 393 is prohibited.
- Management Intent: General resource management intent for this area is to consider mineral exploration and development allowing DNR the discretion to make specific decisions as to how development may occur, through the authorization process.⁷

Mineral development within this unit should additionally be performed in a manner consistent with the intent of Mineral Closing Area 393 to reduce impacts on anadromous and high value resident fish.⁸

Impacts to moose wintering habitat are to be taken into consideration during permit review for mines. Consult with ADFG and other appropriate agencies to establish best management practices.⁹

Bristol Bay Area Plan, Region 06-30: Subunit Description: Corridor Upper Kaktuli River (Map Reference 3-6 /Table 6, Appendix by Reference)

⁵ The Main Supply Depot is located within Subunit 06-23. The Main Supply Depot is not a commercial recreation facility.

⁶ The management intent summary for Subunit 06-23 continues that mineral development may be authorized after sufficient public process including public meetings and comment. This application does not constitute an application for mineral development, but rather continued mineral exploration.

⁷ The management intent summary for Subunit 06-24 continues that mineral development may be authorized after sufficient public process including public meetings and comment. This application does not constitute an application for mineral development, but rather continued mineral exploration.

⁸ See Section 15A – Special Stipulations regarding Mineral Closing Order 393.

⁹ The application under review does not cover a “mine” or “mining activity”. DNR requested comment by the Alaska Department of Fish and Game, among other agencies listed in Section 10, Agency Notice.

- Co-Designation: Public Recreation and Tourism-Dispersed and Habitat
- Classification: Public Recreation Land and Wildlife Habitat Land
- Prohibited Uses: Non- recreational uses incompatible with management intent and objectives of the RRMP except oil, gas and mineral exploration if consistent with management objectives or in the best interest of the State.
- Management Intent: This unit shall be managed to maintain the recreational uses of the Koktuli River and the adjoining upland corridor, its fish and wildlife resources, and public recreation values.

The Koktuli River is a cataloged anadromous fish stream and moose use this area as wintering and calving habitat.

Mineral exploration and development are considered appropriate if consistent with management intent or in the best interest of the state.

Bristol Bay Area Plan, Region 06-31: Subunit Description: PU30/Koktuli River (Map Reference 3-6/Table 6, Appendix by Reference)

- Designation: Public Recreation and Tourism – Public Use Site
- Classification: Public Recreation Land
- Prohibited Uses: Uses which adversely affect public use sites or areas should not be authorized.
- Management Intent: Manage for public recreation and tourism. This area is also important to caribou and moose calving, wintering, and rutting areas. A portion of this unit is part of a land selection by the Lake and Peninsula Borough under its municipal entitlement.

Activities proposed in this application are not expected to adversely affect public use sites in this unit.

Bristol Bay Area Plan, Region 07-19: Subunit Description: Chulitna Area (Map Reference 3-7/Table Reference 7 in Appendix by Reference)

- Designation: General Use
- Classification: Resource Management Land
- Prohibited Uses: Mineral production on lands within Leasehold Location Order 1 is prohibited until an upland mining lease is issued.
- Management Intent: Manage for fish and wildlife and their habitats, dispersed recreation and tourism, and mineral exploration and development.

Some areas within this unit may be used as wintering areas for moose. See Special Stipulation Section 15 below.

Bristol Bay Area Plan, Subunit 08-01: Subunit Description: Groundhog Mountain (Map Reference 03-08/Table 8 in Appendix by Reference)

- Designation: General Use
- Classification: Resource Management Land

- Prohibited Uses: No authorizations should be considered within the Pebble Road and Transportation Corridor without consultation with the ADOT/PF.¹⁰
- Management Intent: Management intent is to provide for fish and wildlife and their habitat, mineral exploration and development, and dispersed recreation.

Mineral development may be appropriate subject to adequate protection of other natural resources. Mineral activity should follow planning guidelines of “Mineral Resources” in Chapter 2 of the BBAP.

Consistent with Management Guideline A: “Access,” the activities proposed do not conflict with the intents of the Pebble Copper Road and Transportation Corridor.

Bristol Bay Area Plan, Subunit 08-05: Subunit Description: Newhalen River (Map Reference 03-8/Table 8 in Appendix by Reference)

- Designation: Settlement
- Classification: Settlement Land
- Prohibited Uses: No authorizations should be considered within the Pebble Road and Transportation Corridor without consultation with the ADOT/PF.¹¹
- Management Intent: The management intent for this unit is settlement land. The unit consists of State-Selected land is partially affected by Leasehold Location Order 1.

Consistent with Management Guideline A: “Access,” the activities proposed do not conflict with the intents of the Pebble Copper Road and Transportation Corridor.

A portion of this unit is covered by Leasehold Location Order 1. No authorizations shall be issued for production without an upland mining lease.

Bristol Bay Area Plan, Subunit 10-01: Subunit Description: Upper Talarik Creek (Map Reference 10-01/Table 10 in Appendix by Reference)

- Co-Designation: General Use
- Classification: Resource Management Land
- Prohibited Uses: N/A
- Management Intent: The management intent for this unit is mineral exploration and development, public recreation and tourism, and protection of anadromous fish and wildlife resources and habitat. Upper Talarik Creek and its riverine area are to be protected, for habitat, recreation and water resource values.

Development authorizations may be appropriate subject to the protection of these resources and the requirements of Mineral Resources within Chapter 2

¹⁰ The Alaska Dept. of Transportation and Public Facilities were notified of the application during the review process. No objections were received.

¹¹ The Alaska Dept. of Transportation and Public Facilities were notified of the application during the review process. No objections were received.

of the BBAP. Specific consideration is to be given to anadromous streams and caribou calving areas in Chapter 2. Authorizations should include a 150' vegetated buffer from ordinary high water of Upper Talarik Creek.¹² Consideration must be provided for potential effects on moose wintering habitat. Authorizations should either avoid or be mitigated to reduce impacts to the maximum extent practicable.¹³

Upper Talarik Creek is cataloged as an anadromous fish stream and is noted for sport fishing opportunity. Portions of this unit are covered by Mineral Closing Order (MCO) 393. No work is proposed within the MCO 393, nor should any be authorized. Moose also use this area to over-winter and brown bear utilize the stream for feeding during salmon spawning season. See Special Stipulation section 15 below.

Bristol Bay Area Plan, Subunit 10-02: Subunit Description: Pebble2 (Map Reference 3-10/Table 10 in Appendix by Reference)

- Co-Designation: Minerals and Habitat
- Classification: Mineral Land and Wildlife Habitat Land
- Prohibited Uses: Permanent facilities related to commercial recreation.
- Management Intent: The management intent for this unit is to consider mineral exploration and development while ensuring the protection of important habitat areas. The portion of Upper Talarik Creek and its riverine area, within this unit, are to be managed to maintain its habitat, water and recreation value.

This unit area has been identified as important to moose wintering habitat. These areas should be avoided or regulated to reduce impacts to the maximum extent practicable¹⁰.

Bristol Bay Area Plan, Subunit 10-03: Subunit Description: Iliamna Lake (Map Reference 3-10/Table 10 in Appendix by Reference)

- Co-Designation: Public Recreation and Tourism – Dispersed, Habitat, and Water Resources
- Classification: Public Recreation Land, Wildlife Habitat Land (see Management Intent below)
- Prohibited Uses: No authorization shall be granted that are within or near the road corridor until the road alignment is known or without consultation with the ADOT/PF¹⁴.
- Management Intent: This unit is managed for its recreational, habitat, and water resource values although mineral exploration and development are considered appropriate within the unit.

¹² See Section 15, Additional Stipulations, for Upper Talarik Creek Vegetative Buffer.

¹³ DNR requested comment by the Alaska Department of Fish and Game, among other agencies listed in Section 10, Agency Notice.

¹⁴ DNR requested comment by the Alaska Department of Transportation & Public Facilities, among other agencies listed in Section 10, Agency Notice.

Many sensitive habitats exist within this unit and authorizations should take care to avoid or minimize such impacts to anadromous fish streams, moose wintering areas and waterfowl concentrations. No surface activities are proposed in the application for this subunit in 2018, however, the analysis encompasses this subunit because of the inclusion of state mineral claims within the application.

The central portion of the unit is important to waterfowl molting (specifically, tundra swans)¹⁵. See special stipulation 15 below.

6. Access

Access to the site will be via helicopter transport from Iliamna Airport or via snow machine during periods of sufficient snow cover. No access construction is proposed.

7. Permitting Background

The project area mining claims under review have been permitted using MLUPs since 1988, with some years in care and maintenance and other years in exploration phases. The applicant applied for and received an extension of the previous MLUP, A20176118, granting authorization for care and maintenance activities through March 31, 2018. The 2018-2022 application (A20186118) was submitted on December 8, 2017 and is subject to *Nunamta Aulukestai, et al v. State of Alaska, Department of Natural Resources, Case No. 3-AN-09-09173 CI* requirements which includes 30-days' notice to plaintiffs in the case of a permit application.

8. Project Review and Agency Notice/Public Notice

Agency Review:

The Division provided the application for review and opportunity to comment for the activities considered for authorization under this summary. The following entities were notified on January 19, 2018 for comment on the application: The Alaska Department of Fish and Game (ADFG), Alaska Department of Environmental Conservation (ADEC), Alaska Department of Transportation and Public Facilities (ADOT&PF), ADNR Large Mine Permitting Team (ADNR-LMPT), ADNR Water Resources Section (ADNR-Water), ADNR South Central Regional Lands Section (ADNR-SCRO), ADNR State Historic Preservation Office (AK SHPO), U.S. Army Corps of Engineers (USACE), U.S. Environmental Protection Agency (USEPA), U.S. Fish and Wildlife Service (USFWS), National Park Service (NPS), Bureau of Land Management (BLM), Mine Safety and Health Administration (MSHA), Aleutians East Borough, Bristol Bay Borough, Lake and Peninsula Borough (LPB), Bristol Bay Native Corporation (BBNC), Bristol Bay Native Association (BBNA), Bristol Bay Coastal Resource Service Area (BBCRSA) and all interested parties that requested notification. Agencies were given opportunity to review the application materials and submit comments for a 31-day period from January 19 through February 20, 2018. No agencies requested additional time for review.

Agency Review Comment and Issue Response

One comment was received from agencies related to the application. The response is as stated below.

Comment 1 – Alaska Department of Fish and Game, Habitat Division

¹⁵ See Section 15, Additional Stipulations, for Waterfowl Molting Area.

ADFG staff informed DMLW the applicant will be required to secure Fish Habitat Permits for water withdrawals from fish bearing waters related to exploration and water use activities. ADFG informed DMLW that the Fish Habitat Permits will be stipulated for screening and water velocities which are addressed in the application.

Comment 1 Response -DMLW noted comment.

Public Notice:

The Division issued a public notice of the application and supporting documents on January 19, 2018. Notice was distributed using the State of Alaska Online Public Notice System and was electronically delivered to parties of the *Nunamta* decision.

Public Notice Comment and Issue Response

The Division received 411 individual comments from the public. Several comment submissions included a single letter with a mailing list attached. Any such comments were treated as a single individual comment for the purposes of the comment counts. A wide variety of comment topics were received which included: opinion, concern for reclamation obligations, environmental conditions, fisheries and wildlife, applicant's compliance history, financial assurance, preservation of permitting processes, fair treatment in the permitting process, timely renewal, economic impact, permit duration and full project support. Permit stipulations have been reviewed and adjusted as needed. Public comments have been reviewed and the agency responses are located in Appendix 2.

9. Potential Environmental Risk

Fuel

The volume and type of hazardous fuel proposed by the applicant constitutes low risk. Potential negative impacts to the environment are further reduced by strict transport and handling procedures, including 110%¹⁶ containment in double walled tanks and additional secondary containment for transport. Spill kits are available at each site where fuel is stored or used and the applicant holds a contract for 24-hour spill response.

DMLW advises applicants that activities involving fuel and hazardous substances and disposal of waste and wastewater must satisfy any pertinent requirements of the Department of Environmental Conservation and the U.S. Environmental Protection Agency.

ARD Test Site

The performance standard for Acid Rock Drainage, 11 AAC 97.240, states a miner must reclaim an area with potential acid rock drainage in a manner that prevents the generation of ARD or prevents the off-site discharge of acid rock drainage. The purpose of the ARD test site is to in fact promote real time acid generation, simulating the natural weathering process. This test facility is an invaluable resource

¹⁶ 110% Containment refers to the holding capacity equal to 110% of the volume contained in the largest tank or container within the containment structure. The extra 10% holding capacity is intended to accommodate precipitation and is a safeguard against miscalculations of tank levels or freeboard.

for understanding the potentially acid generating (PAG) material encountered on site. The ARD barrels are located in such a location that offsite discharge would be improbable if not impossible given the finite amount of rock stored at the site and as such constitutes minimal risk.

Main Supply Depot and Other Facility Structures

DNR has reviewed and inspected facility sites in the 2017 field season and found them to be of de minimis environmental risk. All facilities are on raised platforms or tundra pads to reduce impact on underlying vegetation. The Main Supply Depot (MSD) is erected on a dry, rocky bench, is well consolidated and as compact as practicable. Facility structures are built in a manner which are likely to endure harsh environmental condition, yet are temporary in nature. The operator demonstrates diligence in inspecting, maintaining, and repairing facility infrastructure as necessary.

Sump Use in Mineral Exploration

Commonplace practice in the mineral exploration industry is the surface application of drilling fluids and rock cuttings incidental to drilling activity as means of disposal. While this is generally an acceptable practice, special consideration must be given to sensitive habitats such as those in a tundra environment. DNR recommends the use of a sump pit whenever practical for all exploration drilling. Sumps effectively treat the drill water such that cuttings and drilling muds are allowed to sufficiently settle and are buried to prevent oxidation. Where a sump cannot be dug, such as in bedrock, recirculation tanks should be utilized. The use of sumps and recirculation tanks are the least environmentally invasive cutting management methods.

Mineral Closing Order 393: Mineral Closing Order 393 was imposed on September 13, 1984 and covered a large number of streams in the Bristol Bay Watershed. MCO 393 was issued to protect anadromous fish streams from degradation by instream placer mining. It closes an area of 100 feet on either side (and more in some areas) of selected streams to mineral location and closes the area to mineral entry. Portions of the Lower Fork and Middle Fork of the Koktuli River are covered by MCO 393, as is the main stem of Upper Talarik Creek. Additional streams covered under MCO 393 to the south and west impact the area claimed by the applicant, however, no drilling is proposed to impact areas covered by MCO 393 in this application. Additionally, no exploration activities or evidence of exploration activities were observed during DNR's inspection within MCO 393 in 2017. In concert with the intent of MCO 393, DNR will apply special stipulations to consult with ADFG regarding any proposed activities for the future, including repair or remediation if necessary, within the MCO. No new hardrock exploration drilling shall be authorized under this application within the boundaries of MCO 393.

10. Performance Guaranty:

Pursuant to 11 AAC 96.060(b), a performance guaranty is determined "based on the scope and nature of the activity planned and the potential cost of restoring the permit site." The performance guaranty for this permit will be \$2,000,000. Diamond-core and geotechnical drilling are low impact and highly efficient manners of conducting exploration with low or no impact on the environment. In consideration of the existing drill holes and monitoring wells, sites are stable and under continued supervision of both the applicant and DNR. In consideration of the surface use, structures are well maintained and clear of unnecessary debris. All structures are of a

construction substantial enough to withstand adverse weather and site conditions, yet temporary in nature and within the scope of reasonable necessity under AS 38.05.255 and 11 AAC 86.145.

The Department's determination of the amount of the guaranty is based on the estimations of professional staff for the two key costs associated with a potential restoration of the permit area. First, the Department reviewed estimates for removing the equipment and temporary structures located on site, including the labor, transportation, and mobilization costs of removal. The primary potential cost of restoring the permit site is removal of equipment and stored materials. Second, the department reviewed the scope of reclamation of additional activity planned (80 boreholes total) as well as any reclamation completed last year (266 boreholes), subject to continued monitoring to address any unforeseen issues. The Department determined that the performance guaranty amount that DNR currently holds for the 2017 permit, \$2,000,000, remains an adequate performance guaranty for the proposed exploration boreholes, continued reclamation of existing boreholes, removal of equipment, supplies, and structures. This is based in part on the assumption that in the event that the State would need to hire contractors to complete reclamation, much of the labor and transportation costs would be shared between site remediation and equipment removal. This amount reasonably supports permit performance and compliance by the applicant during the next permit term, and significantly minimizes and mitigates risk to the State in the event of non-performance. This amount is also commensurate with the activities planned under the permit and the supplies authorized by the permit to be on state land during its term.

The performance guaranty will be reassessed and potentially altered if any applications for modifications to the permit are submitted by the applicant and granted, should the applicant propose any increase in the scope or nature of the activities proposed.

11. Insurance

Insurance is a means to protect the State from liabilities incurred through the use of State property or damages to State property.

Insurance Requirement: A Certificate of Commercial General Liability Insurance is required. The policy must have minimum coverage limits of \$2,000,000 combined single limit per occurrence. As required by 11 AAC 96.065, the insurance policy must comply with AS 21 and be issued by an insurer licensed to transact the business of insurance under AS 21. The State must be listed as an additional insured on the policy.

12. Determination

Issue a one-year stipulated and revocable miscellaneous land use permit, authorizing the proposed hardrock exploration activity subject to terms of the permit (attached), continued storage of appropriate support supplies and equipment, the authority to conduct general site care and maintenance, including emergency repair using a helicopter-supported drilling rig with an appropriate work plan filed with DNR, DEC and ADFG as soon as practicable, continue data monitoring/sampling and to conduct reclamation activities for the term of the permit.

The applicant is advised to review permit documents carefully as well as the regulations under AS 27.19 (Reclamation), 11 AAC 97 (Reclamation) and 11 AAC 96 (Provisions for General Land Use Activity).

Recommended Modified or Special Stipulations to be Applied to MLUP

Mineral Closing Order 393

No work is proposed or authorized within Mineral Closing Order 393 under this permit.

Upper Talarik Creek Vegetative Buffer

Within Region 10, Subunit 01 as described in the Bristol Bay Area Plan, disturbance of vegetation shall be restricted within 150' of the ordinary high-water mark of Upper Talarik Creek. No structures are authorized within 150 feet of Upper Talarik Creek.

Caribou Calving Areas

Operations must avoid caribou calving areas (if present) unless alternative mitigation measures to minimize disturbance are authorized by the Department of Natural Resources (DNR) after consultation with the Department of Fish and Game (DFG). Prior to commencing seasonal work, you are required to coordinate with the above agencies to establish best management practices.

Moose Rutting and Overwintering Areas

Prior to commencing seasonal work, you are required to coordinate with the Alaska Department of Fish and Game, Habitat Division to establish best management practices for acoustical disturbances to moose calving, rutting and overwintering areas.

Bear Denning

Operations must avoid occupied bear dens by 1/2 mile unless alternative mitigation measures to minimize disturbance are authorized by the Department of Natural Resources (DNR) after consultation with the Department of Fish and Game (Kate Harper, 907-267-2261). Occupied dens encountered in the field must be reported to the above contact and subsequently avoided.

Waterfowl Molting Area

The central portion of BBAP Subunit 10-03 is important to waterfowl molting, specifically, Tundra Swans (*Cygnus columbianus columbianus*). If activity is planned in this subunit, coordinate with the Alaska Department of Fish and Game to minimize impacts to the maximum extent practicable prior to commencement of the activity.

Modified Fuel Stipulation

Sec 11. Fuel and Hazardous Substances: Secondary containment shall be provided for fuel or hazardous substances in accordance with EPA Emergency Spill Response Regulations.

- a. All independent fuel and hazardous substance containers shall be marked with the contents and the permittee's or contractor's name using paint or a permanent label.
- b. During fuel or hazardous substance transfer, secondary containment or a

surface liner must be placed under all container or vehicle fuel tank inlet and outlet points, hose connections, and hose ends. Appropriate spill response equipment, sufficient to respond to a spill of up to five gallons, must be on hand during any transfer or handling of fuel or hazardous substances. Trained personnel shall attend transfer operations at all times. Vehicle refueling shall not occur within the annual floodplain or tidelands. This restriction does not apply to water-borne vessels provided no more than 30 gallons of fuel are transferred at any given time.

- c. Containers with an aggregate storage capacity of greater than 55 gallons which contain fuel or hazardous substances shall not be stored within 100 feet of a waterbody, or within 1,500 feet of a current surface drinking water source.
- d. Exceptions: The Authorized Officer may under unique or special circumstances grant exceptions to this stipulation on a case-by-case basis. Requests for exceptions should be made to the Authorized Officer.

Drilling Waste and Cuttings Management

- a. Drilling mud and cuttings shall not be discharged into lakes, streams, rivers, or wetlands.
- b. Recirculation tanks or in-ground sumps to contain drilling mud, cuttings and discharged water from the drilling process must be used at any site utilizing water to aid in the drilling activity. Acceptable techniques include dug sumps, tanks and other settling or filtration devices designed specifically for cuttings management.
- c. Drill cuttings and additives will be allowed to sufficiently settle out of the drill water prior to backfilling the sump.
- d. Settled drilling mud and all drill cuttings shall be sufficiently buried and graded to prevent oxidation.

Exploration Activity for the term of this authorization is restricted to the following:

1. Up to 61 geotechnical boreholes as described in A20186118;
2. Up to 19 diamond core drill holes as described in A20186118;
3. Continued repair, reclamation, and general site maintenance;
4. On-going data collection and monitoring, including that of the ARD Test site; and
5. Any other repair, reclamation, maintenance or stabilization activity as ordered by DNR.

Action Requirements on Inspection Reports

Complete and report any outstanding work requirements of any Department inspection report by the date specified in the inspection report for completion.

Amendment Applications

Any modification request will be public noticed for at least 14 days.

Any additional boreholes beyond those described in Special Stipulation A above will require a permit amendment and 30-day public notice period. Any such activity modification requests must be submitted no later than 60 days prior to the proposed commencement of such activities.

Attachments:
Appendix 2 Public Comment Response

Appendix 2: Public Comments and Responses

Following are responses to the public comments that were submitted in e-mail or writing to the Department of Natural Resources' (DNR's) Division of Mining, Land and Water,¹ concerning the Application for Permits to Mine in Alaska (APMA) A20186118 (hereinafter the "application" and the "permit") requesting authorization to conduct mineral and geotechnical exploration, data collection and reclamation.

In summary, the application from Pebble Limited Partnership (PLP) requests authorization to conduct the following activities in the first year of a five-year authorization:

- Drilling up to 61 helicopter supported geotechnical boreholes;
- Drilling up to 19 helicopter supported diamond-drilled core boreholes;
- Conducting minor repair to existing boreholes;
- Continued monitoring and data collection at an established Acid Rock Drainage test facility; and
- Routine inspection of existing boreholes and site facilities.

For background, diamond core drilling is the most common method for subsurface exploration. Generally, a pipe called a casing is installed from the surface through solids and sealed into bedrock. A diamond bit rotates at the end of a drill rod or pipe inside the casing. The opening at the end of the diamond bit allows a solid column of rock to move up into the drill pipe and be recovered at the surface. Most drill rods are 10 feet long and vary in diameter from 25-65mm. After the first segment is drilled, a new section of pipe is screwed into the top end so the combination of pipes can be drilled deeper into the ground. The diamond bit is rotated with gentle pressure and lubricated with water and drilling mud to prevent overheating. The driller adjusts rotation speed, pressure and water circulation for different rock types and drilling conditions. Inside the drill pipe is a core tube, which has a latching mechanism attached to a cable. At the end of each run, the cable is lowered to winch the core tube containing the new rock core to the surface, where it can be recovered. The drill core is stored in specially designed core boxes containing compartments to hold sections of core. The core gets logged and analyzed by a geologist. When drilling is complete, the drilling engineer will fill the hole either completely or in part depending on the presence of water or other conditions.

Sonic drilling generally follows the same process as bedrock diamond core drilling. However, instead of using a diamond bit rotating on the end of a drill rod, the sonic drill head sends high-frequency resonant vibrations down the drill rods to the drill bit. This method is most commonly used to obtain soil or alluvial samples, but can also be used for bedrock sampling. The operator controls the frequencies of the vibrations to suit the specific conditions of the soil/rock geology. The frequency is generally between 100-200 hertz. Air and water may be used to aid drilling, but are not always required. Sonic drilling does not use a drilling mud mixture. Samples are generally bagged and little or no surface disturbance is created as a result.

¹ "DNR", "ADNR", the "Department", the "Division", "DMLW", and "Mining Section," are used to indicate the Alaska Department of Natural Resources.

Comment Overview

In rendering a decision on the December 8, 2017 application, the Department considered comments submitted during the comment period which ran from January 19th, 2018 to February 20th, 2018.²

DNR received a total of 411 individual submittals containing comments on the application. A total of 566 individuals submitted comments; 321 commenters were in full support of the project and 245 commenters were opposed in part or in whole to the project. DNR received one neutral comment. Comments were submitted by five trade organizations (resource extraction industries), three non-governmental organizations and three Tribal organizations. No comments were submitted by federal agencies. Three submissions included a single form letter and a mailing list attachment with 847+ names attached.

For efficiency, categories of similar comments have been grouped together for this response document. Comments within the scope of the application review were considered, as well as relevant, competent and scientifically sound information that commenters cited in support of their comments.

Comment Summaries and Responses

1. Issue Topic: Opinion comments against issuance of the MLUP or exploration and development activities in the PLP Claim Block generally

Comment Summary: Some commenters voiced their opposition to the project. These commenters stressed the importance of salmon in the area to “our culture, environment, way of life, economy, and soul as a state,” as noted by one commenter. Commenters expressed general concerns, with specific examples, that any mining and potential related contamination that might result was too large a risk to take for the Bristol Bay area. For example, in a form comment submitted individually by 53 commenters, commenters noted that:

There is little more important to Alaskans than clean water and our thriving fisheries. In addition to direct impacts to the fishery, thousands of visitors come to southwest Alaska each year to fish in Bristol Bay's wild, remote and productive landscape. Bristol Bay's salmon support 14,000 jobs and a \$1.5 billion fishing industry. Pebble's current plan confirms the very harmful risks that this mine, and its associated infrastructure, will bring to the jobs, communities, and salmon of this region.

Please continue to listen to the people of Alaska and stand up for our fishing communities and cultures. The State and Alaskans can't afford to get stuck paying the bill to clean up Pebble's mess, even if it's just for exploration. The State should not take actions that promote a mine that Alaskans don't want. I respectfully request that you support strong protections for this region, including not renewing Pebble's MLUP - they've already caused enough uncertainty to Alaskan families and communities.

Response: General support/opposition comments were noted. DNR agrees with a need to adequately manage fishery resources, and in administering this MLUP DNR will continue to work closely with the Alaska Department of Fish and Game, which has the regulatory expertise considering management and protection of fish, wildlife and habitat resources. As noted in the

² A comment response document is not required by statute or regulation, but provides a useful summary of the relevant comments on the application that were submitted to DNR during the comment period and Department responses.

response to Comment 13 below, Pursuant to 11 AAC 96.060, DNR has required a performance guaranty of \$2,000,000 as a condition of this permit. This guaranty would protect the state in the event the permittee is unable or unwilling to meet permit obligations.

DNR also notes that while some comments referenced a mine development plan and/or mine plan submitted to the Army Corps of Engineers for review, the activities requested (and authorized) under this permit are limited to exploration and reclamation.

2. Issue Topic: Opinion Comments in favor of issuance of the permit and of the PLP project generally

Comment Summary: Commenters expressed support for the project and “encourage[d] a timely renewal process.”

Response: General support/opposition comments were noted.

3. Issue Topic: Preservation of Practice and Regulatory Process

Comment Summary: Many commenters expressed concern regarding the preservation of DNR’s long standing and rigorous regulatory process for mine permitting in Alaska.

Response: DNR reviewed this application in accordance with applicable law and regulation, including AS 38.05 (Alaska Land Act), AS 27.19 (Mine Reclamation Act), 11 AAC 97 (Mining Reclamation Regulations), and 11 AAC 96 (Miscellaneous Land Use). DNR also reviewed the permit file including previous permits issued and compliance history for the applicant. DNR follows a consistent and practical process for adjudicating mining-related applications in Alaska that takes into account the fact that each permit is unique.

4. Issue Topic: Preservation of Permitting Equality and Timely Renewal

Comment Summary: Do not single out Pebble and treat it unfairly or unequally.

Response: Each mineral exploration or mining application submitted to the State presents a unique and individual set of variables to be considered. The constant in this process is the framework of review: the Alaska Constitution and the laws and regulations governing mining activity in the state. This application is reviewed under the same framework as all other APMA applications, however, the scope and complexity of conducting work at the Pebble deposit is unlike other advanced exploration operations on State lands and merits additional consideration and review by the Department.

Further, as a result of a court order in the *Nunamta v. DNR* litigation, DNR is required to provide a 30-day notice and comment period to the plaintiffs in the litigation on any future MLUP applications by PLP until the Department issues regulations to address the Alaska Supreme Court decision. Fourteen days-notice and comment is required on any modification to a permit for PLP.

The Department provided this notice to *Nunamta* plaintiffs and also provided a courtesy public notice and comment period of 30 days. DNR otherwise typically provides a 14-day courtesy notices for all other mining related MLUP applications. The terms of this permit also provide that any requests for modifications to the permit that include additional boreholes or drill holes beyond those described in Special Stipulation A will require a 30-day public comment period pursuant to Special Stipulation C in the permit.

5. Issue Topic: Activities Proposed will have positive economic benefit

Comment Summary: The exploration process will create much needed jobs for the Alaskan economy. The hiring of local vendors is also a job creator. It also is a valuable teaching tool for those hired and may instill some interest in the industry to many individuals. Timely approval of this permit will give people more time to consider summer employment opportunities, and it will allow PLP to make contractual obligations and other contacts.

Response: DNR encourages all operators, including PLP, to submit permit applications as soon as possible in order to prevent any delays in operational plans. This permit application was submitted on December 8, 2017. After a completeness review, it was noticed to the public on January 19, 2018 for a period of 30 days. The Department has since worked diligently to process the permit adjudication. Regarding timely permit approval generally, DNR notes that it has placed permit stipulations regarding future proposed permit modifications on this permit to ensure timely processing of any such proposed modifications. Special Stipulation Section C of MLUP A20186118 states that

“Any modification request will be public noticed for at least 14 days. **Any additional boreholes or drill holes beyond those described in Special Stipulation A above will require a permit amendment and 30-day public notice period.** Any such activity modification requests must be submitted no later than 60 days prior to the proposed commencement of such activities.”

6. Issue Topic: Activities Proposed will have a negative impact to surrounding habitats.

Comment Summary: DNR must stipulate any authorization to protect fish and wildlife habitats and must require a Fish Habitat Permit.

Response: Applications for mining related activity are carefully examined to address foreseeable impacts to wildlife, fish and upland habitat resources. Adjudicators first research the applicable area plan(s) to identify land use designations and land classifications as well as area restrictions like Leasehold Locations or Mineral Closing Orders. Adjudicators coordinate with the Alaska Department of Fish and Game Habitat Division (ADFG) and the Alaska Department of Environmental Conservation (ADEC) for any necessary mitigation or avoidance measures to be applied to the authorization.

Here, DNR will continue to restrict activity within Mineral Closure Order 393, which restricts mining activity bordering streams important to the spawning and rearing of anadromous and non-anadromous fish species within the exploration area (Special Stipulation D). It also will continue to restrict mining exploration activity in the Upper Talarik Creek Vegetative Buffer restricting vegetation disturbance to greater than 150’ from the ordinary high-water mark (Special Stipulation E), in areas important to caribou calving (Special Stipulation F), and in areas important to moose rutting and overwintering (Special Stipulation G). Activities near occupied bear denning sites (Special Stipulation H), and areas important to waterfowl molting (Special Stipulation I) are also restricted.

The applicant describes fish protection measures on page five of the 2018 Narrative of Operations in Section 3.1. The applicant notes that for water withdrawals associated with activity, it will place on each pump “an 18” distribution sleeve which has been certified by ADFG for use in water bodies containing Group A fish (fry stage whitefish) or larger. The screen maximum approach velocity is 0.1 feet per second and has an outer mesh covering of 1mm x 12mm, slotted.”

In coordination with ADFG during agency review, ADFG notified DNR that a Fish Habitat Permit(s) would be required for the proposed activities. The requirement of another agencies’ authorization does not preclude DNR from issuing an authorization for surface and subsurface use,

though the operator may not begin activity until all necessary authorizations are issued (Section 14 of MLUP).

7. Issue Topic: Duration of Permit should be limited to one year.

Comment Summary: Commenters request DNR limit the duration of authorization to a period of one year due to the applicant providing a scope of work that describes an operational plan for the 2018 field season only. Commenters noted that applicant has not provided reasons to justify why a five-year permit is required.

Response: The permit will be issued for one year.

8. Modifications to permit

Comment: Any proposed modifications to the issued permit, including plans and narratives of operation beyond December 31, 2018, “must be submitted in writing and must be approved by the Department before the permittee undertakes the modification.”

Response: This comment states the MLUP standard for modifications. DNR will require any requests for modifications to be in writing, and provide 14 days public notice and comment on modifications, as noted in Special Stipulation C to the permit. Further, for any modifications that DNR believes are tantamount to a request for a new permit (e.g., significant additional exploration), DNR will require a 30 days’ notice and comment period. *See* Special Stipulation C.

9. Issue Topic: Fishing Resources v. Mining Resources

Comment Summary: There is little more important to Alaskans than clean water and our thriving fisheries. DNR needs to put the interests of those who depend on Bristol Bay’s salmon fisheries first and deny the application.

Response: The State approaches all resource development with the goal of multiple use and sustainability. Both fishing and mining contribute substantially to the Alaska economy. In 2009, the Alaska mining industry was estimated as having a gross value of \$2.83 billion.³ To date, none of the five major metallic mines currently operating in Alaska (Red Dog, Fort Knox, Pogo, Kensington, and Greens Creek) have had significant long-term detrimental impacts on fish-bearing waters and exploration level activity is significantly lower impact than activity that occurs in developing mines. These examples support DNR’s position that fishing and mining are not necessarily inherently incompatible such that this exploration activity application should be denied.

Any proposed mineral extraction project must minimize and avoid impacts to other resources such as fish and wildlife habitat to the greatest extent possible, with the objective of achieving reclamation of the affected area in accordance with applicable laws and regulations once the activity is complete. Applicants must also satisfy the requirements of ADFG and ADEC in addition to those in place by DNR. Because of these requirements, there are significant stream and riparian area protections in place to protect rivers, fisheries, and habitat lands. There is insufficient evidence in the record to support the allegation that the proposed exploration operations would “sacrifice” the fishing industry in the application area or surrounding watersheds. Comments regarding a mine development plan and fisheries are outside the scope of this application.

³ Alaska Division of Geological and Geophysical Surveys, Special Report 72.

10. Issue Topic: DNR should require new Temporary Water Use Authorization Applications.

Comment Summary: Commenters request DNR require the applicant submit new TWUA applications as water use information provided in the Application for Permits to Mine in Alaska (APMA) is incomplete or elusive and needs to be public noticed to provide opportunity for public input. Commenters argue PLP's application states that all required water will be taken from water use locations that have been previously permitted but that the application does not contain full information about water use applications. Commenters argue that requiring new water use applications would allow DNR to provide public notice and an opportunity for comment on temporary water withdrawals in the proposed mine site area.

Response: The APMA application was formed to streamline the permit application process for miners in Alaska, significantly reducing the paperwork burden for both the miner and regulating agencies. The APMA application has been approved to replace individual applications for Fish Habitat Permits, Alaska Pollutant Discharge Elimination System permits, Cross Country Travel Authorizations, Temporary Water Use Authorizations and of course, mineral exploration or extraction approvals. Because of the APMA's multi-faceted and broad scope design, each regulatory agency is responsible for reviewing their respective portions of the form. DNR Mining Section is responsible for reviewing the MLUP-applicable portions of the form.

Water Use Authorizations are reviewed and issued pursuant to applicable Statutes (AS 46) and Regulations (11 AAC 93) by the DNR Water Section, and are outside the scope of the MLUP permit adjudication process. The applicant submitted new Temporary Water Use Authorization (TWUA) requests by completing the Water Use Authorization Section E of the APMA application and will be subject to an adjudicatory review by DNR's Water Section as well as coordination with the Alaska Department of Fish and Game (ADFG) and the Alaska Department of Environmental Conservation (ADEC). Temporary Water Use Authorization applications are not disposals of state interest subject to state constitutional public notice requirements. Your comment has been forwarded to the DNR Water Section.

11. Issue Topic: DNR should require specific reclamation requirements.

Comment: Commenters requested that the Department impose stricter conditions on this permit than conditions required by the agency on past PLP permits, due to alleged problems with past PLP MLUP permits, issues raised in the 2017 Inspection Report, and questions raised by commenters regarding groundwater and soil contamination.

Response: The Department believes that the current reclamation requirements are appropriately specific. Due to the individualized nature of reclamation in some situations, a level of flexibility in addressing issues in reclamation is required. The Department notes that the 2017 Inspection Report noted extremely minor reclamation infractions—missing caps at three sites. The caps are a new requirement, unique to the PLP project, and an example of the need for flexibility. It appears likely that some of the caps are getting knocked off by wind, wildlife, or frost action, as the caps were found on the ground near the well. PLP fixed the cap issues identified by the Department by the end of the field season in 2017, and the Department has discussed with PLP whether alternatives might be appropriate in certain situations (and as provided for in the 2017 permit and this permit). For instance, one of the wells with a cap missing was already sealed, and could just be cut down to the ground and “abandoned” without a cap, as a cap is a redundant feature on a sealed well. DNR addresses the issues of alleged groundwater and soil contamination in Comment Topic 13 below.

Special Stipulation J also includes a requirement to use sumps or similar technology to address drill waste and cuttings management.

12. Refuse permitting if the applicant needs TWUAs or Fish Habitat Permits (FHPs).

Comment: The MLUP should be denied unless PLP obtains all required Temporary Water Use Authorizations and Fish Habitat Permits.

Response: Section 14 of the MLUP notes that issuance of the permit does not relieve the applicant of the responsibility of securing any other permits or authorizations required.

13. Issue Topic: Require a financial assurance/Increase financial assurance amounts

Comment: Commenters requested that DNR require financial assurance from PLP, citing to the potential liability to the state if PLP were to walk away from the project without remediation, restoration, and reclamation. Commenters also cited to the financial status of the company, potential current and future current expenses of the company, and other factors. One commenter requested a \$10,000,000 bond, arguing that amount was necessary to clean up the equipment on the site.

Response: As with the 2017 permit, the Department will require a performance guaranty under 11 AAC 96.060, and an insurance policy pursuant to 11 AAC 96.065.

The Department's determination of the amount of the guaranty is based on the estimations of professional staff for the two key costs associated with a potential restoration of the permit area. First, the Department reviewed estimates for removing the equipment and temporary structures located on site, including the labor, transportation, and mobilization costs of removal. The primary potential cost of restoring the permit site is removal of equipment and stored materials. Second, the department reviewed the scope of reclamation of additional activity planned (80 boreholes total) as well as any reclamation completed last year (266 boreholes), subject to continued monitoring to address any unforeseen issues. The Department determined that the performance guaranty amount that DNR currently holds for the 2017 permit, \$2,000,000, remains an adequate performance guaranty for the proposed exploration boreholes, continued reclamation of existing boreholes, removal of equipment, supplies, and structures. This is based in part on the assumption that in the event that the State would need to hire contractors to complete reclamation, much of the labor and transportation costs would be shared between site remediation and equipment removal. This amount reasonably supports permit performance and compliance by the applicant during the next permit term, and significantly minimizes and mitigates risk to the State in the event of non-performance. This amount is also commensurate with the activities planned under the permit and the supplies authorized by the permit to be on state land during its term.

The performance guaranty will be reassessed and potentially altered if any applications for modifications to the permit are submitted by the applicant and granted, should the applicant propose any increase in the scope or nature of the activities proposed.

14. Soil and Water Sampling

Comment Summary: DNR should deny the permit or include conditions in the MLUP that require soil and water sampling because the "CSP2 report" says the applicant is in violation of its MLUP due to dead vegetation, acid soil, artesian wells or water and soil with elevated metals.

Response: In 2016, the Center for Science and Public Participation (CSP2) prepared a report ("CSP2 report") that documented a five day-long site visit conducted in the fall of 2016. CSP2 visited 107 locations within the Pebble deposit on the visit. The CSP2 report alleged that "71 of 107 sites inspected were not fully reclaimed." It also alleged that 41% of the sites visited "had

environmental issues such as dead vegetation, acid soil, artesian wells, or water, [and] soil or sediment with elevated metals.”

First, the Department notes that reclamation at the PLP site is ongoing, and therefore some sites are not “currently reclaimed.” Some “boreholes” are currently in continued use as open monitoring or data collection sites. In the 2017 permit, the Department required all such open exploration holes and monitoring wells to be adequately capped, where practicable. In some instances, capping might not be practicable because of frost jacking, a natural process of freeze and thaw cycles, which functionally “ejects” structures from the active layer of the ground surface.

The Department always takes public complaints regarding mining seriously, and as a result the Department decided to inspect the sites detailed in the CSP2 report during the 2017 field season. The Department therefore reviewed the CSP2 report and conducted an inspection, to the extent possible, of the sites described by CSP2 in the report. Some sites cited in the CSP2 report lacked sufficient locational information to relocate in 2017, and several others were inadvertently missed by planning error. The Department’s inspection (see report at http://dnr.alaska.gov/mlw/mining/largemine/pebble/field-reports/pebble_fieldrpt_Sept2017.pdf) determined that PLP was not in violation of any of its permit terms or conditions with the exception three violations of MLUP A20176118 Sec.1h, a capping requirement. Before the 2017 field season ended, the operator remedied the violations in a manner found reasonable to the Department.

Upon review of the CSP2 report and the administrative record, the Department concluded that the CSP2 report and the Department’s inspection have to date insufficiently provided compelling evidence or observation of an MLUP violation related to dead vegetation, acidic conditions or elevated metals. This is not only because such conditions occur naturally in a highly mineralized area (and without having further information about CSP2’s background standards and testing protocols, it is impossible to know if the CSP2 results are a result of natural mineralization or PLP activities) but also, as explained further below, because a certain amount of impact from hardrock exploration will be expected as a result of exploration activities and does not necessarily constitute a permit violation. That said, the Department has again consulted with the Alaska Department of Environmental Conservation on this issue and intends to continue to monitor and take action against any unnecessary or undue degradation of land and water resources, including the production and offsite discharge of potentially acid generating material. The Department appreciates citizen involvement and initiative.

For this permit application, many commenters rely on the CSP2 report to comment that there are permit violations or failed reclamation at the PLP site. However, the presence of dead vegetation, acidic soils or water, and elevated metals are not necessarily indicators of permit violations, environmental contamination, or wrongdoing by the applicant.

First, the Department notes that the CSP2 report itself concluded that “[a]cid drainage water was not observed,” and that water in ponds was in general, “good.” See page 29 of CSP2 Report. While the authors of the report cited to elements of potential concern and potential risks of hardrock exploration, they did not identify any current significant issues with the exploration site. Problems noted by CSP2 are also often expressed as tentative or potential in nature, as CSP2 only notes there “may be” long term issues based on the report’s observations. The CSP2 author’s conclusions are likely tentative, in part, because the report is the result of a limited amount of testing and lacks background sampling or sampling protocol described in a manner which would encourage replicability with any level of statistical confidence. Instead, the conclusions that CSP2 (and the Department) may draw from the report are more limited than the conclusions drawn in some of the comments. In other words, the report contains useful information that points to the need for continued DNR monitoring of reclamation and communication with DEC. But the report does not

support the conclusions drawn by some commenters that there are permit violations at the PLP site or widespread environmental contamination.

Below are specific responses to the issues of elevated levels of acid rock drainage and minerals in soil and water around boreholes, dead vegetation, and alleged drill cuttings flushing onto landscape.

Acid rock drainage and high levels of minerals in MLUP area

The presence of increased levels of minerals such as copper in soil samples near a borehole is construed by some commenters as permit violations. However, elevated amounts of minerals in the soil could also merely be a mineral deposit indicator. Exploration geochemistry such as soil sampling is in fact a commonly used and incredibly useful tool in characterizing the regolith⁴ and identifying mineral exploration targets. Indeed, the Pebble Deposit exploration target was discovered by observing a gossan⁵ in what is now known as the Pebble West Deposit. A gossan is the natural phenomenon of sulfide minerals weathering, i.e. natural acid rock drainage. The deposit structure is a broad M-shaped anticline⁶ with fold axes plunging to the SE. The deposit hosts classic copper porphyry characteristics (copper, gold, and molybdenum primarily), and hosts two primary resources in the Pebble East and Pebble West zones. The Pebble East Zone is buried by Tertiary-aged sedimentary and volcanic cover. Here, scientists can expect neutral or near neutral pH levels. In the Pebble West Zone, the mineralized deposit is outcropping or near surface. Here, scientists can anticipate naturally elevated levels of mineralization and higher acidity (low pH) throughout the PLP claim block. And boreholes are likely to be drilled at locations where an operator believes there might be high mineralization. Knowing there are elevated minerals at the site of a borehole does not necessarily indicate the increased levels were caused by exploration activity or the presence of drill cuttings on tundra.

Further, even if increased levels of acidity or mineralization are found to have been caused by drill cuttings, that is not necessarily a permit violation. It is expected and logical that exploration and mining activity might have some impact on the environment it is conducted within. The key goals that the Department addresses are minimizing that impact and ensuring proper reclamation of any such impact. The MLUP permit terms reference the reclamation standards of 11 AAC 97, and specifically 11 AAC 97.240, “a miner shall reclaim a mined area that has potential to generate acid rock drainage in a manner that prevents the generation of acid rock drainage or prevents the offsite discharge of acid rock drainage.” It is not a requirement of the reclamation under 11 AAC 97 or prior permits to prevent all acid rock generation entirely, but to prevent offsite drainage.

Under previous permits, Pebble was permitted to discharge the small amounts of rock materials that resulted from drilling directly onto the surface (drill cuttings), as this remains an accepted and standard industry practice and presents *de minimis* risk to surrounding environments. Additionally, PLP utilized sumps (required to be utilized in the current permit), or small ditches to collect and bury these materials to minimize surface impacts. While PLP did not have an obligation to use sumps, it is an industry best practice and is preferred by the Department.

⁴ Regolith is used here as reference to detrital rock material and organics covering bedrock including volcanic material, glacial deposits, alluvium, aeolian deposits, organic horizons and vegetation.

⁵ A gossan is a weathered surface expression of rock that contain(ed) substantial sulfide mineralization.

⁶ An anticline is a descriptor for a ridge-shaped fold in the rock. Here, we observe two consecutive folds to form an “M” shape.

In standard mining terms, drill cuttings are small, fine pieces or shavings of *in situ* rock that resulted from drilling of the borehole. Because there is a small, finite amount of such drill cuttings associated with a borehole, the acid that may be generated from even extremely highly mineralized drill cuttings is a finite, small, and localized amount, and there is little potential for drainage of any kind. As noted in responses to comments last year, the PLP claim block area is heavily mineralized and the acid generation potential from the drill cuttings is consistent with the general environmental status of acid generation from natural outcrops. Portions of the ore body at the PLP claim block location are already exposed at the surface in many locations as discussed above, which causes natural formation of acidic conditions across the area.

Requiring removal of drill cuttings is not required by DNR given their *de minimis* potential for acid generation, however DNR investigated the allegations made in the CSP2 report. DNR subsequently found no visual indication of acid generation from drill cuttings on the ground surface. The Department intends to continue to monitor boreholes through reclamation and be on the lookout for signs that acid generation may be occurring and/or being transported offsite. Further, PLP has proposed that it will construct sump pits for its 2018 exploration activities, and the Department has incorporated this proposal as a requirement in Special Stipulation J in the permit. In sum, as noted in last year's response to comments for the 2017 PLP permit, acidic soils with high metal concentrations are expected in areas of mineral potential.

Regarding allegations of contaminated water surrounding boreholes, DNR is aware of most sites that are producing very small amounts of water and regularly coordinates with the applicant for their management. The applicant is required to consult appropriate management agencies for monitoring wells and exploration boreholes producing water. The applicant may be required to sample if scientifically sound to do so, continue monitoring or close the hole depending on the foreseeable impacts to environmental quality. Last year, the Department required PLP to examine approximately 80 sites discussed in the CSP2 report as areas of concern, in addition to inspecting boreholes identified by PLP and DNR as requiring follow-up. The Department itself inspected 278 sites in the project area last summer. DNR intends to continue robust inspections of a duration and frequency to ensure compliance. Further, in the 2017 permit, in order to address concerns about water, the Department has previously required that all open exploration holes and monitoring wells to be adequately capped, where practicable. Some sites are not practicable to cap because of frost jacking, a natural process of freeze and thaw cycles, which functionally "ejects" structures from the active layer of the ground surface. The capping stipulation is also in the 2018 permit (See Section 1g of MLUP A20186118).

As previously noted, CSP2 report does not identify where water quality sampling has shown a violation of any state water quality standards. DNR has continued to consult with the Alaska Department of Environmental Conservation (ADEC), the regulatory agency responsible for regulating water quality in the State of Alaska. DNR investigated allegations in the 2017 field season with ADEC Compliance Staff and will continue to consult with ADEC on water quality issues as necessary. If permit violations are identified, DNR or ADEC will take the appropriate enforcement action and may increase the amount of financial assurance as appropriate.

Dead vegetation

Regarding dead vegetation, DNR's 2017 inspection again yielded areas where DNR ordered additional seeding. As noted in previous responses to comments, vegetative impacts are expected in areas of high mineralization, and not necessarily an indication of incomplete or inadequate

reclamation. Generally, it is acknowledged by scientists and regulators that vegetation can fail to thrive in highly mineralized areas even if there is no human activity of any kind. DNR's reclamations statutes require that a site be reclaimed to a condition to "allow for the reestablishment of renewable resources on the site" "within a reasonable period of time by *natural* processes." AS 27.19.100(7). The regulations similarly require stabilization that "achieves natural revegetation." 11 ACC 97.200. A mine operator is not required to completely replace an established "natural" vegetation community. The word "natural" is instead used to describe the process by which revegetation may occur-naturally, by operation of nature, not necessarily by active reseeding by the miner. Active reseeding is not a statutory or regulatory requirement.

That said, active reseeding is encouraged by the Department, and PLP has typically reseeded voluntarily and in consultation with DNR. It continues to be the Department's standard practice to identify areas that need re-seeding on its inspections.

Drill cuttings flushing onto landscape

Commenters noted that the CSP2 report identified open drill casings with drill cuttings flushing out onto the landscape, and noted that soil samples of drill cuttings and areas of drilling discharge waste had elevated levels of copper and molybdenum, and the drill cuttings were acidic. The allegation of flushed drill cuttings from the drill casings is not supported by either sampling results or by observation of DNR. Nor has PLP reported such observations. As noted above, elevated heavy metal and trace elements can be anticipated in soil horizons coving an ore body. The commenters noted that it appeared that drill holes were not cemented properly. Department staff on inspections have not observed flushing of drill cuttings.

There were also allegations that cement casings were observed to not have been "properly" cased around boreholes. This comment likely references cement collars sometimes placed at the base of a casing. These eventually crack off and degrade as the site ages, but has no bearing on the success of the internal material plug, which is the plug that matters to seal the borehole.

Commenters note that the CSP2 report speculated that even with the use of sumps, that the sumps "could turn acidic if the ability of cuttings to generate acid exceeds the ability of buffer possibly provided by drill mud," and that therefore "groundwater samples" were necessary and "could indicate whether contamination exists, since the waste itself is problematic, and the sumps [are] unlined." The Department believes that such conjectures at this point are speculative. Sump reclamation itself is the act of burying potentially acid generating material such that the material would not have opportunity to oxidize (See Special Stipulation J). As noted above, drill cuttings have a finite amount of acid generation potential, and sumps are considered a best practice that will significantly reduce the probability of acid rock drainage.

Finally, commenters noted that drill cuttings and waste were observed in kettle ponds. The CSP2 report found that "additional water quality and sediment monitoring would be required [for these kettle ponds] to determine if there are impacts to aquatic organisms." DNR did not observe evidence of this practice occurring during the Department's 2017 inspections. This practice has been documented in prior inspections by DNR. Special Stipulation J, incorporated in this permit, states:

Drilling mud and cuttings shall not be discharged into lakes, kettle ponds, streams, rivers or wetlands.

Potential impacts from past practices regarding aquatic resources are beyond the scope of this adjudication and would be handled by the Alaska Department of Fish and Game.

15. Area of permit

Comment: Some commenters mentioned a concern about the size of the permit area or requested that the permit be geographically limited to areas where PLP still has reclamation obligations, open boreholes, equipment and supplies, or some combination thereof.

Response: When reviewing this issue, the Department concluded that the permit area applied for is preferred by the Department and in the interest of the state. The Department prefers that all activities conducted within the claim block may be included in reporting and discussion requirements of the permit, and that any relevant permit stipulations would then extend to any operations pursuant to the permit in that area (as some operations might still otherwise be allowed as a generally allowed use in that area without a permit).

It is important to note that the geographic scope of the area of this permit does not bind the geographic scope of future authorizations, nor does it directly impact the scope of any potential application for an authorization for extraction.

Any additional exploration activities not outlined in this application will need to be approved as a new permit or a modification to this permit as described in Topic Comment 7 and Special Stipulation C to the permit.

16. Issue Topic: Deny a permit authorizing any exploration activity

Comment Summary: Commenters request a denial of the permit for any exploration activity based on concerns about the impact of exploration and/or mining in the area.

Response: The Department has decided to approve the application with stipulations to address concerns about potential impacts to fish and wildlife, water and land resources. The Alaska Department of Fish and Game and the Alaska Department of Environmental Conservation may further stipulate or restrict activities proposed.

17. Require removal of all equipment and materials and require complete reclamation

Comment Summary: Commenters noted that materials and some structures have been on site for at least 10 years and argue that these structures are not temporary and should be removed.

Response: The Department conducted an extensive review of all of the structures on site and has determined that the structures may be dismantled at any time. Further, the structures and the materials are related to the activities proposed to be conducted during the permit term. The structures and equipment must be removed at the end of the permit term unless another authorization is acquired.

18. Release all geologic data from current or past drilling activity especially regarding ARD potentials.

Comment Summary: Commenters wish DNR would require PLP to release all geologic data.

Comment Response: At this point in time, the Department has no regulatory reason to request “all geologic data” from current or past drilling activity. Even release of drilling activity regarding acid generating materials would not impact the assumptions made for regulatory purposes and maintained in the care and maintenance of a drill hole—that the materials in it are likely to contain ARD, and thus various precautions already exist to assume that possibility.

To the extent that PLP provides DNR with geologic information, applicants often request confidentiality for competitive business reasons, and DNR might not be able to release it to the public. Under AS 38.05.035(a)(8), the director of the division of lands must maintain the records the commissioner considers necessary, with the exception that “all geological, geophysical, and engineering data supplied, whether or not concerned with the extraction or development of natural resources” shall be kept confidential “upon request of the person supplying the information.”

The Department has passed this request for public geologic and acid rock drainage data along to the applicant. PLP has in the past released environmental reports, including a comprehensive environmental baseline report containing more than 20,000 pages of data and analysis. The Pebble Environmental Baseline Document (EBD) is a publicly available resource and can be found at <http://www.pebbleresearch.com>.

19. PLP needs to have an APDES permit.

Comment: Commenters argue that PLP needs to have an APDES permit.

Response: The Department has forwarded this comment to ADEC. Applicants must acquire any other authorizations needed pursuant to Section 14 of the permit.

20. PLP Comprehensive Monitoring Program

Comment: Require a complete and comprehensive inventory and monitoring program for ALL of the more than 1,300 well sites, and perform all necessary reclamation. The DNR should require a thorough and detailed review, including on-the-ground sampling, at every well site to ensure that all reclamation requirements have been met. Because no complete inventory or monitoring program has reviewed all of the wells, there exists significant potential for irreparable harm and contamination to nearby soils and waters.

Response: The Department has a comprehensive inventory of boreholes, referred to as the borehole tracking sheet. This list is the best way for the applicant and the DNR to follow the reclamation program. As noted in response to Comment Topic 13, soil and water sampling at each borehole has not been deemed necessary at this point in time.

21. Prohibiting activity in areas covered by Mineral Closing Orders.

Comment: DNR should prohibit activities in areas that are covered by Mineral Closing Orders.

Response: The Department has applied a specific stipulation restricting surface activity and drilling in Mineral Closing Order 393. See Special Stipulation D of MLUP A20186118.

22. PLP must reclaim all current boreholes before any new activity is conducted.

Comment: DNR must prohibit any new or expanded exploration activities as PLP still has not completed reclamation on existing boreholes, and as its proposed mine in the recent application

to Army Corps of Engineers indicates that the proposed mine will have a huge detrimental effect on Bristol Bay.

Response: The scope of this application is restricted to the proposed geotechnical drilling, exploration drilling, ARD testing and care and reclamation activities. This application was distributed to the Army Corps of Engineers and no comment was received. The dredge and fill permit application recently submitted to the Corps of Engineers is outside of the scope of this authorization.

Regarding pending reclamation obligations, there is no requirement to have all outstanding reclamation completed prior to the authorization to conduct additional exploration. That said, PLP conducted an aggressive borehole reclamation work plan last year as a requirement of its permit and currently the only “open” boreholes are those being maintained as monitoring wells. DNR will continue to conduct ongoing inspections and will require reclamation amendments as necessary.

23. Water Quality Monitoring and Surface Dispersal Monitoring

Comment: “The impacts of water discharged from operations is not sufficiently accounted for in this application. A great deal of water will be used to drill these boreholes. Two pumps are requested in the permit, each running 24 hours a day, pumping 25 gallons per minute for a month. That is a total of 2,160,000 gallons of water. ADNR must require monitoring and reporting on the quality of water discharged. Information about heavy metal concentration and acid generating chemicals is needed to engineer treatment and discharge. Currently, water is discharged on the tundra without monitoring. The fact that this is allowed amounts to negligence on the part of ADNR. In order to issue a permit ADNR must ascertain what the water being dumped consists of. Heavy metals are generally released in drilling operations. In excessive amounts, they are known to be toxic to nearly every form of life; they never degrade and they bioaccumulate; ADNR must insure that their “adverse effects on the land and its resources” are minimized.”

Response: Water use is regulated by DNR’s Water Section. Applications for Temporary Water Use Authorizations (TWUAs) were submitted and are being reviewed by DNR. Water quality monitoring is conducted by the Alaska Department of Environmental Conservation (ADEC). The application was forward to ADEC for review. The water proposed for discharge to the surface is excess water from in-ground sumps and is anticipated to be *de minimis* in quantity. The 2,160,000 gallons of water cited in the above comment is the total water used for drilling operation. This water will be recirculated to the extent possible in recycling tanks. Any excess water not captured by the tanks will be routed to multistage sumps to promote solid settling and infiltration of the excess water. Any remaining water proposed for discharge will be pumped and dispersed across the uplands away from all surface waters and wetland. The applicant will be monitoring dispersal application and will relocate dispersal locations as necessary. Further, the probable amount of heavy metals in excess drill contact water is unlikely to bioaccumulate in such a way that would exceed levels naturally occurring on site.

24. Potential Contaminated Water Migration

Comment: “What assurance do we have that this water has been sufficiently treated? What assurance do we have that that water is not making its way down into the wetlands and into fish habitat? What assurance do we have that it is not contaminating the tundra where it is dumped? What assurance do we have that it is not entering the water table? The fact is that all of the above are probable. ADNR needs these assurances to meet the standard of “minimizing environmental

impacts.” Furthermore, given the saturation of the surrounding land and high water table, we demand that DNR evaluate the need for an APDES Wastewater Discharge Permit.”

Response: The Department has not observed conditions which would illustrate contamination of wetlands or fish habitat. The Department has not observed conditions which would indicate contamination of the tundra and ADFG has not documented an impact to fish resources in the project area or downstream from the project vicinity. The Department has minimized potential impacts via project-specific stipulations of the permit. In regards to the need for an APDES authorization, this comment has been forwarded to the Alaska Department of Environmental Conservation.

25. Wetlands Management and Compliance with Nationwide Permit-6

Comment: “Much of the land where boreholes are drilled are wetlands or drain into wetlands. The application states that wetlands are protected though ostensible compliance with Nationwide General Permit for Survey Activities (NWP-6). No evidence is presented to demonstrate any such compliance. For example, NWP-6 mandates certification of water quality in accordance with the Clean Water Act, Section 401. ADNR must verify compliance with NWP-6 though monitoring of water quality standards and establishment of non-degradation in order to adequately protect the wetlands.”

Response: It is the responsibility of the Army Corps of Engineers to enforce NWP-6 terms. The application was provided to the Army Corps of Engineers for review. No comment was received.

26. DNR’s Compliance Inspection Program

Comment: “DNR must expand and toughen a comprehensive inspection program including randomized no-notice inspections to ensure that PLP obeys the law regarding reclamation, protection of wetlands, discharged water quality, and water withdrawal procedures.”

Response: DNR will continue its rigorous inspection program. With the onset of exploration activity, DNR will conduct multiple inspections with minimal notice to monitor exploration activity, monitor general site compliance, and follow up on reclamation conducted in prior years. Partnering agencies like the Alaska Department of Fish and Game and the Alaska Department of Environmental Conservation are also anticipated to conduct field inspections to monitor potential impacts to fish and wildlife resources and water quality.

27. Inspection Violations and Outstanding Reclamation Needs

Comment: “As documented by the 2017 APMA A20176118-FIELD SUMMARY REPORT, ADNR found boreholes missing caps in violation of MLUP A20176118 reclamation stipulation 1g. In addition, nearly every borehole inspected had something wrong with it, such as unsuccessful repairs to boreholes, subsidence, lack of vegetative regrowth, and water production. This is an unacceptable report card. No permit can be issued until forgoing reclamation has been successfully completed and verified.”

Response: The commenter is misinformed. DNR observed 12 sites which required additional reclamation or monitoring activity out of 278 sites inspected. This equates to approximately a 95% compliance rate, assuming that the sites that required additional reclamation

also had violations of the permit. But the need to conduct additional reclamation is not necessarily the result of a permit infraction. For instance, if a permittee was instructed to seed an area and the seed did not take, another instruction to seed might be noted. There were three sites observed with infractions (capping issues). All sites with noted reclamation issues were remedied in a manner and timeliness satisfactory to the Department by the end of the 2017 field season.

28. Inspection Violation and an Increase in Performance Guaranty

Comment: “The 2017 permit required a performance guarantee of \$2,000,000 to provide for remediation and restoration in the event that PLP is unable to complete reclamation. This value must be increased in 2018 to register the increased risk taken on by the state given PLP’s inability to successfully cap boreholes. This number must be further raised to account for the larger number of potentially uncapped and leaking boreholes a 2018 permit would authorize, and to account for the cost of removal of any additional structures and equipment on site. Evaluations of the performance guarantee must be modified to account for PLP’s poor performance and increasing activity. Additionally, increased insurance guarantees are needed to account for the same significant risks.”

Response: Based on DNR’s 2017 observations, 98.9% of boreholes were appropriately capped. Since this is a new requirement of the 2017 authorization and not required of any other mineral exploration project on State land, DNR was satisfied with PLP’s response in abating the violations. Caps were missing on three boreholes and the problem has been fixed. The Department has deemed that this does not present a significant increased environmental risk warranting an increase in the performance guarantee amount.

29. The Applicant Must Acquire a Fish Habitat Permit

Comment: A Fish Habitat Permit must be obtained from Alaska Department of Fish and Game before this permit is issued.

Response: DNR agrees that a Fish Habitat Permit will likely be required by the Alaska Department of Fish and Game. ADFG informed the DNR on February 1, 2018 that a separate application from the APMA for Fish Habitat Permits would not be required, but that ADFG may request additional information necessary to issue a Fish Habitat Permit.

30. Increased Risk for Fuel Spills and contact with potentially acid generation material

Comment: PLP will be disturbing state lands with drilling rigs, using a massive quantity of water from nearby streams – approximately 72,000 gallons per day – and depositing drill muds and excess water directly onto sumps and the tundra. In addition to these routine impacts, PLP’s borehole drilling activities increase the risk of fuel spills, could lead to acidic drill cuttings left on the tundra, and leave behind sumps and disturbed vegetation.

Response: DNR has mitigated the risk of such potential impacts through MLUP A20186118 Section 11 (Fuel and Hazardous Substances) and Special Stipulation L (Drilling Waste and Cuttings Management). See also prior comment responses for Issue Topics 10-14.

31. Additional Boreholes are unnecessary

Comment: DNR is constitutionally required to issue an MLUP to PLP in a manner that limits PLP's surface use to that "necessary for the extraction or basic processing of the mineral deposits, or for both." Prior to issuing PLP an MLUP for activities on state lands, including the drilling of 80 more boreholes in a region with more than 1,350 already drilled, DNR should inquire into PLP's purposes for its proposed 2018 drilling program and the MLUP geographic scope in two ways. First, DNR should assess whether it is necessary for PLP to drill additional boreholes within the claim block to, as it purports, "support permitting efforts and advance design options for potential mine facilities." Second, DNR should assess the geographical scope of PLP's permitted activities moving forward. Now that PLP has offered a formal mine proposal to undergo federal permitting that is a small fraction of the 417 square miles of authorization PLP is requesting in its MLUP authorization, DNR should consider the fate of PLP's nearly 2,000 mining claims that are not utilized in its mine plan and have never contained any active or inactive boreholes.

Response: Pursuant to AS 38.05.255(a) and 11 AAC 86.145(a), surface use of land or water is limited to those "necessary for the prospecting for, extraction of, or basic processing" of mineral deposits, and is subject to reasonable concurrent use. PLP's proposed exploration boreholes meet these requirements. Geotechnical boreholes expand understanding of the regolith in relation to mine design (primarily the siting of mine facilities). Advancing the understanding of the unconsolidated material under potential mine facilities is in the interest of the State as it is directly related to the management of risk associated with potential construction of tailings dams and site facilities. Diamond core drilling activities are used to delineate resource boundaries. When an operator understands exactly where the resource lies and its associated characteristics, undue disturbances can be avoided. In fact, exploration drilling is an activity that typically continues past the initiation of mine construction and development. Operators use low impact exploration drilling to continue delineating resources to evaluate for future extraction.

In regard to the extent of the claim block and the "fate" of any mining claims not utilized in any future mine development, these are issues outside the scope of an MLUP authorization. Questions about the area of the permit were responded to in Comment Topic 15.

32. Other Land Use Applications need to be public noticed.

Comment: It has come to our attention that PLP may be proposing work on state lands this year outside of its mineral claims and the scope of work proposed in APMA A2018611864. We ask that DNR issue public notices for all DNR permit applications.

Response: This comment is outside the scope of the current permit application.

33. DNR should require follow up from inspections

Comment: DNR should continue to require PLP to submit a work plan to address remediation concerns identified in the agency's field inspections, such as it did during the 2016 field season and incorporated into the 2017 MLUP approval. Finally, any MLUP issued to PLP should contain the explicit term that the MLUP will not be renewed unless the performance guaranty, monitoring, work plan, and reclamation requirements have all been met.

Response: The Department will require the applicant to satisfy any action requirements that result from an agency inspection. See Special Stipulation B. The permit is conditioned upon receipt

of the performance guaranty (Section 4). Permit compliance history is considered in issuing extensions, amendments, or new permits.

34. The Pebble mine creates a risk of acid leaching that will release into waters of Bristol Bay area.

Comment: The Pebble Mine, as evidenced by its Acid Mine Drainage Report filed with the Alaska Department of Natural Resources in 2008 has a very serious problem with production of sulfuric acid from these ores. The acids will then cause leaching of cadmium, arsenic, mercury and other elements naturally found in the rock. If this mine is built, there will be no economic way to control the production of acids. The hydrology of the region pretty much assures that the acid and chemicals released by these acids will end up in Iliamna Lake and in the surrounding waters.

Response: Any mine development plans are outside the scope of this application and permit.