



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ref: 8ENF-L

May 12, 2011

Todd C. Hennis,
San Juan Corporation, and
Salem Minerals, Inc.
645 Water Street
Silver Plume, CO 80476

Re: Administrative Order Directing Compliance With Request For
Access – Docket No. CERCLA-08-2011-0008 - **Urgent Legal Matter-
Immediate Attention Requested**

Dear Mr. Hennis:

Enclosed you will find an Administrative Order Directing Compliance With Request For Access – Docket No. CERCLA-08-2011-0008, (Order), directing you, San Juan Corporation, and Salem Mineral, Inc. to consent to EPA accessing the list of mining claims or properties listed in Exhibit A to the Order. Please note that this Order contains short timelines for you to respond or request a conference and that the Order becomes effective 5 business days after your receipt. Your immediate attention is requested.

Please contact Mr. Richard Sisk, Attorney at (303) 312-6638 with any questions.

Sincerely,

Matthew Cohn, Supervisor Attorney
Legal Enforcement Program

Kelcey Land, Director
Technical Enforcement Program

Enclosure

cc: Sabrina Forrest, 8EPR-B
Steven Way, 8EPR-SA
Mike Rudy, 8ENF-RC
Richard Sisk, 8ENF-L



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 8

2011 MAY 12 AM 9:54

FILED
EPA REGION VIII
HEARING CLERK

IN THE MATTER OF:
Upper Animas Mining District Site
San Juan County, Colorado

ADMINISTRATIVE ORDER DIRECTING
COMPLIANCE WITH REQUEST FOR
ACCESS

Todd C. Hennis, San Juan Corporation, and
Salem Minerals, Inc.

U.S. EPA Region 8
CERCLA Docket No. CERCLA-08-2011-0008

Respondents

Proceeding Under Section 104(e) of the
Comprehensive Environmental Response,
Compensation, and Liability Act, as
amended, 42 U.S.C. § 9604(e)

ADMINISTRATIVE ORDER DIRECTING COMPLIANCE
WITH REQUEST FOR ACCESS

TABLE OF CONTENTS

I. <u>JURISDICTION</u>	1
II. <u>STATEMENT OF PURPOSE</u>	1
III. <u>FINDINGS OF FACT</u>	2
IV. <u>CONCLUSIONS OF LAW AND DETERMINATIONS</u>	4
V. <u>ORDER</u>	6
VI. <u>ENFORCEMENT</u>	7
VII. <u>ADMINISTRATIVE RECORD</u>	8
VIII. <u>OPPORTUNITY TO CONFER</u>	9
IX. <u>EFFECTIVE DATE; COMPUTATION OF TIME</u>	10
X. <u>NOTICE OF INTENT TO COMPLY</u>	10
XI. <u>TERMINATION</u>	11

I. JURISDICTION

1. This Administrative Order ("Order") is issued to Todd C. Hennis, San Juan Corporation, and Salem Minerals, Inc. (hereinafter, "Respondents"), pursuant to the authority vested in the President of the United States by Section 104(e)(5) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9604(e)(5), and the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR § 300.400(d)(4). This authority was delegated to the Administrator of the United States Environmental Protection Agency ("EPA") on January 23, 1987, by Executive Order 12580, 52 Fed. Reg. 2923, re-delegated to the Regional Administrators of EPA on May 11, 1994, by EPA Delegation No. 14-6, and further delegated jointly to the Assistant Regional Administrator for the Office of Ecosystems Protection and Remediation and the Assistant Regional Administrator for the Office of Enforcement, Compliance and Environmental Justice. This authority has been re-delegated to the supervisors or delegatee of each program or office where appropriate including the undersigned officials.

II. STATEMENT OF PURPOSE

2. This Order requires Respondents to grant EPA and its authorized representatives entry and access to the property described in Paragraph 4 below ("the Property") located in San Juan County, Colorado for the purpose of determining the need for response by conducting field inspections and investigations, including but not limited to the drilling of holes and installing monitoring wells, sampling and monitoring water, soil, and mine waste material from mine waste rock dumps, tailing impoundments, and mine workings, and other actions related to the investigation of surface or subsurface contamination in, on, or near the mine sites or other areas

as necessary to evaluate releases of hazardous substances in the Upper Cement Creek area of the Upper Animas Mining District Site (the "Site"). This Order further requires Respondents to refrain from interfering with access to the Property by EPA and its authorized representatives for the purposes set forth herein.

III. FINDINGS OF FACT

3. Records in the San Juan County Clerk and Recorder's Office show that Respondents presently owns property in San Juan County, Colorado in the Upper Cement Creek area of the the Site.

4. The specific parcels of land or mining claims, to which EPA is seeking access from Respondents, are listed in Exhibit A. Together these parcels or mining claims make up the Property under this Order and are collectively referred to as the Property in this Order. Attached as Exhibit B is a map showing the particular parcels that make up the Property.

5. The Property is made up of mining claims that have been inactive since at least 1991. The Property contains mine waste dumps, draining adits, and associated lands that have been impacted by mining. Previous samplings on these properties and within the Site have shown that hazardous substances or pollutant or contaminants have been released and are a threat to continue to be released from the Property.

6. Respondents allowed EPA access to the Property for sampling and investigation before December 31, 2010. EPA's investigations and sampling by EPA and other agencies on this Property have shown that elevated levels of cadmium, copper, lead, and zinc are found in the waste rock piles, that many of the piles are acid producing due to the presence of pyrite (iron disulfide) and other sulfide minerals, such that the heavy metals found in these piles are easily

mobilized during spring snow melt and/or rain events and released to nearby land, surface water and groundwater. EPA sampling of the drainage around the waste rock and draining adits shows that this water has a low pH and contains metals above levels that are toxic to aquatic organisms. For example, adit discharge flows range from 100 to approximately 200 gallons per minute between the Mogul Mine and Gold King Level 7 mine. These discharges contain heavy metals in concentrations that are several orders of magnitude above applicable chronic stream standards for Cement Creek and are a major source of heavy metals causing degraded water quality in the Animas River.

7. Under prior grants of access, EPA installed monitoring equipment that requires access to the Property for retrieval of the data and equipment.

8. To address the release or threatened release of a hazardous substance or pollutant or contaminants at and adjacent to the Property, EPA is conducting certain response actions. These actions include performing a removal assessment and site investigation.

9. To perform the response actions described above, it will be necessary for employees, agents, contractors, and other representatives of EPA to immediately enter the Property. The activities for which entry is required include:

- Conducting field inspections and investigations, and staging equipment to evaluate the mining waste, adit discharges and related seepage, and the associated impacted lands.
- The drilling of holes and installing monitoring wells and other actions related to the investigation of surface or subsurface contamination in, on, or near the mine sites.
- Sampling and monitoring water, soil, and mine waste material from mine waste rock dumps, tailing impoundments, and mine workings or other areas as necessary to evaluate releases of hazardous substances.

- The sampling and characterization of any solids or liquids stored or disposed of on site.

10. EPA estimates that the duration of the required entry and access will be approximately through December 30, 2012. Due to the limited field season in the Rocky Mountain high country and the period required to perform investigations, this is the minimum period of access that can reasonably be anticipated. Additional time may be required.

11. Despite requests from representatives of EPA, Respondents have refused to provide access for purposes of performing the response activities described above. These requests include requests sent by e-mail on September 21, 2010, October 04, 2010, and February 17, 2011, a phone call on September 21, 2010, phone messages left but not answered or responded to on numerous occasions, and a letter dated April 28, 2011 from Steven Way, EPA On-Scene Coordinator (OSC) to Todd Hennis and San Juan Corporation.

12. EPA and its contractors have been ready to perform the sampling since early March, 2011, but have been prevented from so doing because of the Respondents' failure to grant access.

IV. CONCLUSIONS OF LAW AND DETERMINATIONS

13. The Site is a "facility" within the meaning of Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

14. Respondents are each a "person" within the meaning of Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

15. All of the substances listed in Paragraphs 5 & 6 above are hazardous substances or pollutants or contaminants within the meaning of Sections 101(14) and 101(23) of CERCLA, 42 U.S.C. §§ 9601(14), 9601(23).

16. The past and present disposal and migration of a hazardous substance or pollutant or contaminant at or from the Property constitutes an actual "release" or a threat of such a release into the "environment" within the meaning of Sections 101(8) and 101(22) of CERCLA, 42 U.S.C. §§ 9601(8) and (22), and thus there is a reasonable basis to believe that there may be a release or threat of release within the meaning of Section 104(e)(1) of CERCLA, 42 U.S.C. § 104(e)(1).

17. The property owned or controlled by Respondents referred to in Paragraph 4 above is, or is adjacent to, a vessel, facility, establishment, or other place or property:

- a. where a hazardous substance or pollutant or contaminant has been generated, stored, treated, disposed of, or transported from; and
- b. from or to which a hazardous substance or pollutant or contaminant has been or may have been released; and
- c. where such release is or may be threatened; and
- d. where entry is needed to determine the need for response or to identify the appropriate response.

within the meaning of Section 104(e)(3) of CERCLA, 42 U.S.C. § 9604(e)(3).

18. Entry to property owned or controlled by Respondents by the agents, contractors, or other representatives of the United States is needed for the purposes of determining the need for

response, or otherwise enforcing the provisions of CERCLA, within the meaning of Section 104(e)(1) of CERCLA, 42 U.S.C. § 9604(e)(1).

19. EPA's request for access to the Property has not been granted.

V. ORDER

20. Based upon the foregoing Findings of Fact, Conclusions of Law and Determinations, and the Administrative Record, Respondents are hereby ordered to provide EPA and its officers, employees, agents, contractors, and other representatives, full and unrestricted access at all reasonable times to the Property for the purpose of conducting response activities, including but not limited to performing a removal assessment and site investigation, including

- Conducting field inspections and investigations, and staging equipment to evaluate the mining waste, adit discharges and related seepage, and the associated impacted lands.
- The drilling of holes and installing monitoring wells and other actions related to the investigation of surface or subsurface contamination in, on, or near the mine sites.
- Sampling and monitoring water, soil, and mine waste material from mine waste rock dumps, tailing impoundments, and mine workings or other areas as necessary to evaluate releases of hazardous substances.
- The sampling and characterization of any solids or liquids stored or disposed of on site.

21. Respondents shall not interfere with EPA's exercise of its access authorities pursuant to 42 U.S.C. § 9604(e) and 40 C.F.R. § 300.400(d), and shall not interfere with or otherwise limit any activity conducted at the Property pursuant to this Order by EPA, its officers, employees, agents, contractors, or other representatives. Any such interference shall be deemed a violation of this Order.

22. Nothing herein limits or otherwise affects any right of entry held by the United States pursuant to applicable laws, regulations, or permits.

23. This Order shall apply to and be binding upon Respondents and their successors, heirs and assigns, and each and every agent of Respondents and upon all other persons and entities who are under the direct or indirect control of Respondents, including any and all lessees of Respondents.

24. In the event of any conveyance by Respondents, or Respondents' agents, heirs, successors and assigns, of an interest in the Property, Respondents or Respondents' agents, heirs, successors and assigns shall convey the interest in a manner which insures continued access to the Property by EPA and its representatives for the purpose of carrying out the activities pursuant to this Order. Any such conveyance shall restrict the use of the Property so that the use will not interfere with activities undertaken or to be undertaken by EPA and its representatives.

Respondents, or Respondents' agents, heirs, successors and assigns shall notify EPA in writing at least thirty (30) days prior to the conveyance of any interest in the Property, and shall, prior to the transfer, notify the other parties involved in the conveyance of the provisions of this Order.

VI. ENFORCEMENT

25. Compliance with this Order shall be enforceable pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. § 9604(e)(5). A court may impose a civil penalty on Respondents of up to \$37,500 for each day that Respondents unreasonably fail to comply with this Order, as provided in Section 104(e)(5) of CERCLA, 42 U.S.C. § 9604(e)(5), and the Civil Monetary Penalty Inflation Adjustment Rule, 69 Fed. Reg. 7121, 40 C.F.R. Part 19.4. In addition, any person who is liable for a release or threat of release of a hazardous substance or pollutant or contaminant

and who fails to comply with this Order may be liable for punitive damages in an amount up to three times the amount of any costs incurred by the United States as a result of such failure, as provided in Section 107(c)(3) of CERCLA, 42 U.S.C. § 9607(c)(3). Nothing herein shall preclude EPA from taking any additional enforcement actions, and/or other actions it may deem necessary for any purpose, including the prevention or abatement of a threat to the public health, welfare, or the environment arising from conditions at the Property, and recovery of the costs thereof.

26. Nothing in this Order constitutes a waiver, bar, release, or satisfaction of or a defense to any cause of action which EPA has now or may have in the future against Respondents, or against any entity which is not a party to this Order.

27. Nothing in this Order shall affect in any manner the right of EPA to issue any other orders to or take any other administrative or civil action against Respondents or any other parties under CERCLA which relate to this Property or any other site.

28. Nothing in this Order constitutes a decision on preauthorization of funds under Section 111(a)(2) of CERCLA, 42 U.S.C. § 9611(a)(2).

VII. ADMINISTRATIVE RECORD

29. EPA has established an Administrative Record which contains the documents that form the basis for the issuance of this Order. It is available for review by appointment on weekdays between the hours of 8 a.m. and 4 p.m. at the EPA offices at 1595 Wynkoop Street, Denver, Colorado. To review the Administrative Record, please contact Phoebe MacLeish at 303-312-6546 to make an appointment.

VIII. OPPORTUNITY TO CONFER

30. Within three business days after receipt of this Order by Respondents, Respondents may request a conference with EPA, to be held no later than two business days after Respondents' request, on any matter pertinent to this Order, including its applicability, the factual findings and the determinations upon which it is based, the appropriateness of any actions Respondents are ordered to take, or any other relevant and material issues or contentions which Respondents may have regarding this Order. Respondents may appear in person or by an attorney or other representative at the conference. Respondents may also submit written comments or statements of position on any matter pertinent to this Order no later than the time of the conference, or at least two business days before the effective date of this Order if Respondents do not request a conference. EPA will deem Respondents to have waived their right to the conference or to submit written comments if they fail to request the conference or submit comments within the specified time period(s). Any request for a conference or written comments or statements should be submitted to:

Richard Sisk, Attorney
Legal Enforcement Program
United States Environmental Protection Agency
Region 8
1595 Wynkoop Street, 8ENF-L
Denver, CO 80202-1129
Telephone: 303-312-6638
Email: sisk.richard@epa.gov

IX. EFFECTIVE DATE: COMPUTATION OF TIME

31. Because of the immediate need to conduct the activities described above, this Order shall be effective five business days after its receipt by Respondents or Respondents' designated

representative unless a conference is timely requested as provided above. If a conference is timely requested, then at the conclusion of the conference or after the conference, if EPA determines that no modification to the Order is necessary, the Order shall become effective immediately upon notification by EPA of such determination. If modification of the Order is determined by EPA to be necessary, the Order shall become effective upon notification by EPA of such modification. Any EPA notification under this paragraph may, at EPA's discretion, be provided to Respondents by facsimile, electronic mail, or oral communication; provided that if EPA does use such a form of notification, it will also confirm such notification by first class, certified or express mail to Respondents or their legal counsel. Any amendment or modification of this Order by EPA shall be made or confirmed in writing.

32. For purposes of this Order, the term "day" shall mean a calendar day unless expressly stated to be a business day. "Business day" shall mean a day other than a Saturday, Sunday, or federal legal holiday. When computing any period of time under this Order, if the last day would fall on a Saturday, Sunday, or federal legal holiday, the period shall run until the next business day.

X. NOTICE OF INTENT TO COMPLY

33. On or before the effective date of this Order, Respondents shall notify EPA in writing whether Respondents will comply with the terms of this Order. Respondents' failure to notify EPA of its unconditional intent to fully comply with this Order by the time the Order becomes effective shall be 1) construed as a denial of EPA's request for access, and 2) as of the effective date of the Order, treated as a violation of the Order. Such written notice shall be sent to:

Richard Sisk, Attorney
Legal Enforcement Program
United States Environmental Protection Agency
Region 8
1595 Wynkoop Street, 8ENF-L
Denver, CO 80202-1129
Telephone: 303-312-6638
Email: sisk.richard@epa.gov

XI. TERMINATION

34. This Order shall remain in effect until the undersigned officials or their designee notifies Respondents in writing that access to the Property is no longer needed.

SO ORDERED.

BY: Kelcey Land DATE: 5/11/11
Kelcey Land, Director
Technical Enforcement Program
Office of Enforcement, Compliance and Environmental Justice
United States Environmental Protection Agency, Region 8

BY: Matthew Cohn DATE: 5/11/11
Matthew Cohn, Supervisor
Legal Enforcement Program
Office of Enforcement, Compliance and Environmental Justice
United States Environmental Protection Agency, Region 8

Exhibit A

Owner	Owner Address	Claim Name	Mineral Survey No.	Parcel No.	Current Deed	Associated Mine
HENNIS, TODD C.	P.O. BOX 1, SILVER PLUME, CO 80476-0059	ANGLO SAXON	14875	47750160050028	R145692	GOLD KING
HENNIS, TODD C.	P.O. BOX 1, SILVER PLUME, CO 80476-0059	BIG AMERICA	17472	47750170050007	R140962	MOGUL-GRAND MOGUL
HENNIS, TODD C.	P.O. BOX 1, SILVER PLUME, CO 80476-0059	BLACK CAT	17975	47750210050028	R143932	MOGUL-GRAND MOGUL
HENNIS, TODD C.	P.O. BOX 1, SILVER PLUME, CO 80476-0059	HARRISON MILLSITE	14710 B	47750160050028	R145692	GOLD KING
HENNIS, TODD C.	P.O. BOX 1, SILVER PLUME, CO 80476-0059	HERBERT PLACER	13562	47750210050011	R144063	GOLD KING
HENNIS, TODD C.	P.O. BOX 1, SILVER PLUME, CO 80476-0059	HOLY CROSS	17975	47750170050007	R140962	MOGUL-GRAND MOGUL
HENNIS, TODD C.	P.O. BOX 1, SILVER PLUME, CO 80476-0059	SAMPSON MILLSITE	1618 B	47750160050014	R144668	GOLD KING
HENNIS, TODD C.	P.O. BOX 1, SILVER PLUME, CO 80476-0059	SAMPSON NO. 2 MILLSITE	1619 B	47750160050014	R144668	GOLD KING
HENNIS, TODD C.	P.O. BOX 1, SILVER PLUME, CO 80476-0059	SUCCESS PLACER	1914	47750160050014	R144668	GOLD KING
SALEM MINERALS, INC.	P.O. BOX 1, SILVER PLUME, CO 80476-0059	THERESA MILLSITE	15968 B	47750090050081	R147489	MOGUL-GRAND MOGUL
SAN JUAN CORPORATION	P.O. BOX 1, SILVER PLUME, CO 80476-0059	A.P. HILL	1922	47750160050027	R144657	GOLD KING

Owner	Owner Address	Claim Name	Mineral Survey No.	Parcel No.	Current Deed	Associated Mine
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	ALICE	17371	47750160050027	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	AMERICAN	14704	47750150050009	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	CALUMETE	1203	47750100050009	R139491, R144776	MOGUL-GRAND MOGUL
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	CAUCASUS	468	47750150050009	R139491, R144776	MOGUL-GRAND MOGUL
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	CROSS CUT AND NARROW GAUGE	16523	47750100050009	R139491, R144776	MOGUL-GRAND MOGUL
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	E. PLURIBUS	520	47750090050008	R139490, R144776	MOGUL-GRAND MOGUL
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	GOLD KING	5689	47750150050009	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	GOLD KING EXTENSION	19965	47750150050003	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	GOLD KING EXTENSION NO. 1	19965	47750150050003	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	GOLD KING EXTENSION NO. 3	19965	47750150050003	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	GOLD KING NO. 1	14707	47750150050009	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	GOLD KING NO. 2	11640	47750150050009	R144657	GOLD KING

Owner	Owner Address	Claim Name	Mineral Survey No.	Parcel No.	Current Deed	Associated Mine
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	GOLD KING NO. 3	14709	47750150050009	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	GOVERNOR	17371	47750160050027	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	GRAND MOGUL	521	47750100050009	R139491, R144776	MOGUL-GRAND MOGUL
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	HOFFMAN	5782	47750160050019	R144657	RED AND BONITA
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	I.X.L.	1923	47750160050027	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	LIBBIE BAUDER	14704	47750150050009	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	LIBBIE BAUDER EXTENSION	17371	47750160050027	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	M.E. HARRISON	469 (west half)	47750100050009	R139491	MOGUL-GRAND MOGUL
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	N.G.	466	47750100050013	R144509	MOGUL-GRAND MOGUL
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	PAUL	2387 A	47750160050007	R145731	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	PORTLAND CONSOLIDATED	13330	47750160050019	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	ROB THE RANTER	778	47750090050014	R144508	MOGUL-GRAND MOGUL

Owner	Owner Address	Claim Name	Mineral Survey No.	Parcel No.	Current Deed	Associated Mine
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	ROSS	491	47750100050013	R144509	MOGUL-GRAND MOGUL
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	SAMPSON	1618 A	47750150050009	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	SAMPSON NO. 2	1619 A	47750160050027	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	SIDE DISH	5475	47750090050014	R144508	MOGUL-GRAND MOGUL
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	SUNSHINE	14704	47750160050027	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	THERESA	15968 A	47750090050008	R139490, R144776	MOGUL-GRAND MOGUL
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	WATERVILLE	14704	47750150050009	R144657	GOLD KING
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	WINCHESTER	467	47750100050013	R144509	MOGUL-GRAND MOGUL
SAN JUAN CORPORATION	P.O. BOX I, SILVER PLUME, CO 80476-0059	YOUNG	16523	47750090050008	R139490, R144776	MOGUL-GRAND MOGUL

Exhibit B

