



APMA F20252955
Ester Antimony Project
Fairbanks Mining District
Memorandum of Decision

Applicant(s):

Great Land Minerals, LLC- Lessee and Operator
James Oliver-Mineral Property Owner
Range Minerals Alaska, LLC-Mineral Property Owner

9/19/2025

**1. REQUESTED LAND USE AND PROPOSED ACTIVITY
DESCRIPTION:**

Executive Summary:

Great Land Minerals LLC has proposed to conduct a hardrock exploration on State mining claims on Ester Dome near Fairbanks Alaska, within the Fairbanks Mining District. The project proposes 300 exploration drill holes to target the resources. The exploration activity will utilize an Air Track Drill reaching a maximum depth of 90 feet. The project also proposes an estimated 30 trenches of various length and depths for the purpose of extracting and transporting Antimony off the claim block. The project will use a CAT 325 or similar excavator with a backhoe configuration to conduct trenches. Trenches will be open for 1 to 2 weeks. Lastly, the project proposes collecting bulk samples of near-surface antimony mineralization, which will be removed from the project location using a medium sized dump truck.

Access to the claim block will be from the south end of Henderson Road or the East end of Ester Dome Road to the top of Ester Dome. New trails and several historical mining roads and trails will be used for access and transportation of heavy equipment to potential mineral locations within the claims block.

Proposed Surface Occupancy:

There is no proposed Surface Occupancy requested at this time. All personnel housing and/or camps will be located offsite on private property.

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The project requests to place small temporary shelter tents, estimated 10' X 10', to be used for personnel from the weather. Also, 2 self-contained Porta Pottys will be strategically placed for the convenience of field staff. Tents will be moved as necessary from one exploration target area to the next and removed from the project location at the end of the season.

Fuel Storage:

The project is proposing to store less than 1,320 gallons of petroleum products. Storage is not near any flowing water bodies. No petroleum products or materials will be removed from the project site at the end of the season.

Acreage Disturbance and Reclamation Bonding:

Pursuant to AS 27.19.030, this operation is more than five acres and requires a reclamation plan approval. The applicant proposed to disturb approximately 4.3 acres of State managed lands. Total proposed disturbed acreage is 4.3 acres. The applicant intends to reclaim all drill sites and trenches prior to the end of field season or as soon as the sites are no longer needed. Excavation sites that require further work may be left open but will be protected from animal and human entry and exit ramps will be installed.

The drill sites and trenches will be reclaimed by covering the disturbance with the stockpiled topsoil and vegetative mat, allowing natural seeding to prioritize revegetation. Reclamation of drill sites will be completed immediately upon removal of drill rig or at the end of the season.

All equipment and structures will be removed at the end of service life or when the project is

concluded. Equipment will be dismantled and removed according to applicable State and Federal laws. The camp will be restored and cleaned of debris. Regrowth is anticipated to start shortly after demobilization.

This project is currently bonded through the Statewide bond pool for 5 acres.

Water, Fish, Wildlife, Wetlands and Cultural Surveying:

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

- Alaska Department of Natural Resources, Division of Mining, Land & Water, Water Section (DMLW-Water)
- Alaska Department of Natural Resources, Office of History and Archeology (OHA)
- Alaska Department of Fish and Game, Habitat Division (ADFG)

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- Alaska Department of Environmental Conservation (ADEC)
- U.S. Army Corps of Engineers, Alaska District (USACE)
- U.S. Fish and Wildlife Service (USFWS)

2. PROPOSED ACTION

The Division will authorize Great Land Minerals, LLC, Range Minerals Alaska, LLC, and James Oliver's proposed operations via a Plan of Operations Approval according to 11 AAC 86.150 and 11 AAC 86.800 for a term beginning on the date of issuance and ending on October 15, 2030, unless extended under 11 AAC 86.800(d).

3. ADMINISTRATIVE RECORD

The administrative record for the proposed action consists of the Constitution of the State of Alaska, the Alaska Land Act as amended, applicable statutes and regulations referenced herein, the Eastern Tanana Area Plan for State Lands (ETAP) and other classification references described herein, and the case file for the application serialized as APMA F20252955.

4. SCOPE OF DECISION

The scope of this decision is to determine if it is in the State's interest to issue a Plan of Operation for proposed surface uses of Range Minerals Alaska, LLC, and James Oliver's state mining claims. The scope of administrative review for this authorization is limited to (1) reasonably foreseeable, significant effects of the uses to be authorized; (2) applicable statutes and regulations; (3) facts pertaining to the land or resources; and (4) issues that are material to the determination that issuing the authorization is in the interest of the State of Alaska.

5. RELEVANT STATUTORY & REGULATORY AUTHORITIES

Relevant Statutory Authorities:

AS 38.05.020 Authority and Duties of the Commissioner

AS 38.05.035 Powers and Duties of the Director

AS 38.05.195 Mining Claims

AS 38.05.255 Surface Use of Land or Water

AS 27.19 Reclamation

Relevant Regulatory Authorities:

11 AAC 86.800 Mining Rights

11 AAC 96 Miscellaneous Land Use

11 AAC 87 Mining Reclamation

6. PROPOSED PERMIT AREA LOCATION

Geographic Location:

The project location is split into distinct geographical locations. The first location is North facing within the Northwest Quadrant of Ester Dome, the second location is to the west of Henderson Road between St. Patrick's Road to the south and Ester Dome Road to the north. Both locations are within the Fairbanks D-3 US Geological Survey (USGS) quadrangle (scale 1:63, 360) within the Fairbanks Mining District.

Legal Description:

Proposed activity is within Sections 32 of Township 001 North, Range 002 West, Fairbanks Meridian and;

Sections 13, 24 & 25, Township 001 North, Range 003 West, Fairbanks Meridian

7. LAND STATUS INFORMATION

The requested activities lie within the State of Alaska within State of Alaska general grant lands.

The requested activities lie within the State of Alaska general selection GS 958. The subject lands within F001N002W received Tentative Approval/ #1965-0034 to the State on 1/12/1965. The State Received Patent #50-66-0449 on 04/07/1966.

The requested activities lie within the State of Alaska general selection GS 30. The subject lands within F001N003W received Tentative Approval to the State on 08/15/1962 for portions of sections 13 & 25 and all of section 24. Further Amended Tentative Approval for portions of 13 & 25 issued 09/13/1983. Patent 50-68-0153 issued 12/14/1967.

The entire history of land transfers on General Selection GS 958 and GS 30 can be found on DNR's online Land Administration System at:

[https://dnr.alaska.gov/projects/las/#filetype/GS/filenumber/958/landflag/y/searchtype/cas
efile/reporttype/detail](https://dnr.alaska.gov/projects/las/#filetype/GS/filenumber/958/landflag/y/searchtype/cas
efile/reporttype/detail)

[https://dnr.alaska.gov/projects/las#filetype/GS/filenumber/30/landflag/y/searchtype/casefi
le/reporttype/abstract](https://dnr.alaska.gov/projects/las#filetype/GS/filenumber/30/landflag/y/searchtype/casefi
le/reporttype/abstract)

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 Order

None

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Leasehold Location Order

None

Municipal Selection

None

Other Permits, Leases or Actions

ADL 421705- Camp, Unknown Trespass, Active

APMA F20212850- Land Use Permit, Rita Eaglehead, Issued

APMA F20215913-Approved Reclamation Plan, Robert Emerson, Active

APMA F20237130-Land Use Permit, Roger Burggraf, Application Complete

APMA F20252963-Reclamation Letter of Intent, Great Land Minerals LLC, Active

TWUA F2025-042-TWUA, Felix Gold Alaska Operations, Application Complete

ADL 421635-Potential Hazard, Unknown Owner, Unverified

RST 1602-RS2477, Ester Dome-Nugget Creek Trail, Nominated

Land Agreements, Settlements, Conveyances, Reconveyances and Municipal Entitlements of land

MHT 9400543, Land Use License, Chena Goldstream Fire & Rescue, Issued

MH 126- Mental Health Trust Land Office, Relinquished

ADL 229606-Mental Health Trust Land Office, Agreement/Settlement, MH Replacement Pool, Approved 06/12/2006.

QCD 8000031-MH Grant Land, DNR MHTLO, Conveyed

Other Land Information

Description of activities above lie within the management provisions or may be affected by the Eastern Tanana Area Plan for the following regions:

Eastern Tanana Area Plan: Fairbanks Area

Plan Name: Map 3-2a

Description: F-19, Mi, Rd

- **Designation:** Mineral and Recreation
- **Classification:** None
- **Prohibited Uses:** None
- **Management Intent:** Unit is to be retained and is to be managed for its mineral and public recreation values. Recreation will be emphasized to the

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extent that it does not interfere with mining activity. Mineral development must consider potential impacts on recreational and residential uses and provide appropriate avoidance or minimization practices. Historic sites that do not conflict with current or future mining activity should be protected and retained in public ownership. RS 2477 routes are to be retained. Use of this area for small scale commercial and personal use harvest is considered appropriate to the extent that it is compatible with mining activity, both current and planned. This area has been characterized by significant mining activity and is considered to have high grade mineralization. Further development of subsurface resources is expected during the planning period.

- **Management Provisions or Restrictions:** None

8. ACCESS

Primary route of access to the claim block is Henderson Road leading North from Ester and/or Ester Dome Road leading west of Sheep Creek Road, which are under the authority of the Alaska Department of Transportation and Public Facilities (DOT&PF). Because it is managed by DOT&PF and not the Alaska Department of Natural Resources (DNR), the use, access, and general maintenance of the road fall outside the scope of DNR's permitting and regulatory authority. Accordingly, this decision does not address or impose stipulations regarding the use of St. Patrick's Road, as the road is not subject to regulation under mineral exploration permitting requirements administered by DNR.

Any vehicle traffic associated with this mineral exploration project, including transport of personnel, heavy equipment, and supplies, is subject to the same traffic laws, regulations, and restrictions applicable to the public on the state highway system. This includes compliance with load/weight limitations, posted speed limits, seasonal weight restrictions, and other DOT&PF requirements intended to ensure safety and protection of state transportation infrastructure. Responsibility to comply with these requirements rests with the operator and is independent from permits or authorizations issued by DNR for mineral exploration activities.

The project also proposes utilizing several historical mining roads and access trails throughout the claim block. The project proposes conducting trail improvements to historical trails that have been overgrown and unusable. Great Land Minerals proposes using a PrimeTech 300 masticator (or mulcher) to remove alder brush and deadfall trees for safer access. Trail improvements and construction methods include water bars, sediment traps and installing erosion control measures to mitigate or minimize sediment transport.

Access will be primarily through the summer season, May 1 through October 15th, annually. Project geologists and field staff will use pickup trucks and/or ATVs to access the project daily. Appropriate signage will be placed at strategic locations to notify the public of anticipated exploration-related traffic.

9. PERMITTING BACKGROUND/ HISTORY OF APPLICANT COMPLIANCE

Great Land Minerals LLC, Range Minerals Alaska, LLC and James Oliver have no noncompliance history and are in good standing with the Division.

10. AGENCY & PUBLIC NOTICE

Agency Notice

The Division provided the application for review and opportunity to comment on the activities considered for authorization under this summary. The following entities were notified on May 21, 2025 for comment on the application: The Alaska Department of Fish and Game (ADFG), Alaska Department of Environmental Conservation (ADEC), ADNR Water Resources Section (ADNR-Water), ADNR State Historic Preservation Office (AK SHPO), U.S. Army Corps of Engineers (USACE), Bureau of Land Management (BLM), Fairbanks North Star Borough (FNSB), and the US Fish and Wildlife Service (USFWS). Agencies were given opportunity to review the application materials and submit comments for a 14-day period.

Agency Review Comment and Issue Response

Alaska Department Environmental Conservation: Issued a Determination that no DEC authorizations were needed.

Division Response: Thank you for your comment. No action required.

Public Notice

The Division issued public notice of the application and supporting documents on May 21, 2025. Notice was distributed using the State of Alaska Online Public Notice System. During the Public Notice Period, 67 individual comment submissions were received, which totaled a 102 pages of comments.

DMLW's public comment responses are located in Attachment A of this document.

11.POTENTIAL ENVIRONMENTAL RISK

This decision considers the environmental factors directly related to the authorization for use of state lands, specifically whether the approval of the authorization is in the State's interest. The purpose of this consideration is to identify any associated mitigation measures or other requirements necessary to protect the public interest while informing the overall decision of whether or not to approve the authorization.

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The environmental risks associated with this activity are low. Risks may be minimized by following the permit stipulations and utilizing Industry best management practices.

Fuel:

The project is proposing to store less than 1,320 gallons of petroleum products. Storage is not near any flowing water bodies. Transporting 2000 gallons within a fuel truck or 100 gallons in a pickup truck. All Equipment operating under this APMA will utilize drip pans & have spill clean up kits at hand with absorbents available at all times.

Camp Reclamation, Remediation and Removal:

The camp/employee housing is located on private land is outside the scope of this decision.

12.PERFORMANCE GUARANTY

Performance guarantees are means to assure performance and to provide ways to pay for corrective action if the permittee fails to comply with the requirements set forth in the permit document. They are also used to protect state land from damage and to make certain that improvements are removed and that the land is returned in a usable condition upon termination of the permit.

Upon review of the scope and nature of the proposed activities, in combination with the applicants' history of acceptable compliance, the Division has determined to not require a performance guaranty¹. The Division reserves the right to evaluate the performance guaranty at any time during the life of the permit, and at least annually. If a performance guaranty is required and not provided timely, the authorization will be nullified without further consideration.

13. INSURANCE

Insurance is a means to protect the state from liabilities incurred through the use of state property, or from damage to state property as a result of accidental or catastrophic events. This type of protection is necessary in the event of an accident or negligence that was consequentially connected to activities conducted on state land, and/or if the state is named in a lawsuit as a result of an accident or negligence.

After consideration, the Division has determined not to require insurance based on the scope and nature of the proposed activities. The Division reserves the right to evaluate

¹ Great Land Minerals, LLC. is separately bonded through participation in the Statewide Reclamation Bond Pool (AS 27.19.040(b)), which provides adequate financial assurance. Should the operator default, the Division may access these pooled funds after administrative process to complete all required reclamation, ensuring the State and public resources are protected in accordance with statutory requirements

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the insurance requirement at any time during the life of the Plan Approval, and at least annually. If insurance is required and not timely provided, the authorization will be nullified without further consideration.

14. MODIFIED OR SPECIAL STIPULATIONS TO BE APPLIED TO THE PLAN OF OPERATIONS APPROVAL

The following modified or special stipulations have been included to the issued Plan of Operations Approval:

Forest Debris: When using, creating, or maintaining trails, trees and large forest debris must be cleared or fallen in a way that does not obstruct trail use or create a hazard to the public.

Trail Reclamation: Any rutting of trails must be smoothed out prior to the end of each mining season or when the trail will no longer be used; whichever is sooner.

Signage: The Following shall be adhered to at all times while operations can impact the public:

- a. Trails impacted by exploration activities are to be temporarily closed when heavy equipment or ground disturbance poses a direct safety risk. Closures will be limited to active work periods only.
- b. Warning signs or barricades will be posted at all approaches to areas where hazards are present.
- c. Signs will be readily visible, legible, and describe the hazard and any protective actions (e.g., “Danger – Heavy Equipment Operating”).
- d. Signs will be posted before and during operations, removed or updated promptly when no longer applicable, and placed to ensure safe visibility for trail and road users.

Stockpiles: Stockpiles of bulk sample or waste rock must follow the timeline and guidance provided in the application.

Stockpiles: Stockpiles consisting of bulk sample or “non ore bearing” sample is not allowed to be placed on state lands when ongoing activities are seasonally suspended.

Trenches: Trenches must be reclaimed in a manner that prevents the accumulation of ice over the winter and water in the summer.

DOT Rights of Way: This authorization to conduct Hardrock Exploration and Reclamation is limited to lands managed by the Division of Mining, Land & Water. At no time shall any improvements, modifications, maintenance, or construction

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activities be undertaken within the Department of Transportation (DOT) right-of-way without the prior written notification to and express written authorization from the DOT. All such activities must strictly comply with all applicable DOT standards, requirements, instructions, and conditions, as prescribed by the DOT.

Equinox Marathon: At no time during the 24-hour period surrounding the Equinox Marathon shall any equipment, materials, or activities obstruct, impede, or render inaccessible any portion of the designated marathon trail route. The permittee is strictly prohibited from causing or allowing such obstructions and must ensure the trail remains fully accessible throughout the entire marathon timeframe. The permittee shall coordinate annually with Running Club North to determine the specific date and timeframe of the Equinox Marathon. Such coordination must be completed no later than the first week of September each year. The Division has determined that the Equinox Marathon constitutes a reasonable concurrent use of the surface estate of the claims.

Drilling Waste and Cuttings Management:

1. Drilling mud and cuttings shall not be discharged into lakes, kettle ponds, streams, rivers, or wetlands. 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. Drill cuttings and additives in sumps must be allowed to sufficiently settle out of the drill water prior to backfilling the sump.
2. Settled drilling mud and all drill cuttings shall be sufficiently buried and graded to reasonably prevent oxidation.

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.

Fire Prevention, Protection, and Liability:

- a. 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.
- b. 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.

Annual Exploration / Reclamation Report:

File Annual Work Plan

You are also required to file an Annual Exploration Report by December 31st of each

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year; please ensure that your report contains the following information:

- a) A written narrative describing your activities and the reclamation measures utilized at all disturbances.
- b) A topographic map showing the portion of the claim block where surface disturbing exploration 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).
- c) A photo, with appropriate caption, of each reclaimed drill site and exploration trench.
- d) A photo of representative sections of any new road or trail construction.
- e) A detailed description of the methods used to plug the drill holes.
- f) A list of Mining Claims by ADL# that contain unreclaimed disturbance at the end of the year and a total acreage that remains unreclaimed.

Additionally, each calendar year of the permit, the applicant shall file a work plan detailing the number, type and location of proposed activities under this authorization to be conducted for that exploration year, including any repairs and details of the repair plans. The Annual Work Plan is due by March 31. If no work is proposed, a timely statement shall still be filed.

15. AS 38.05.195 MINING CLAIMS

Mining claims established pursuant to AS 38.05.195 are a recognized interest in real property. By properly locating and recording a mining claim on state land, a claimant acquires the exclusive right to possession of and extraction of locatable minerals within the boundaries of the location. This right is legally enforceable as a property interest, and it provides the basis for permitting exploration and development activities on state mining claims. The Division's records indicate that the applicant (Range Minerals and Mr. Olliver) is the locators of record for the claims and is therefore recognized as having the exclusive mineral rights associated with the claims necessary to support issuance of the requested exploration authorization.

Importantly, while mining claims do not confer unrestricted ownership of the land surface, they do provide the locator with the right to use the surface to the extent necessary to access and develop the mineral estate². Both the Alaska Constitution, Article VIII, Section 11, and AS 38.05.255 recognize that the right of possession and extraction necessarily entails the right to occupy and use the land surface in furtherance of mining-related

² Article VIII, section 11 of the Alaska Constitution provides that "[p]rior discovery, location, and filing, as prescribed by law, shall establish a prior right to these minerals and also a prior right to permits, leases, and transferable licenses for their extraction." However, holders of mining claims "do not have an automatic right to mine their claims. To actually extract minerals, they must acquire the necessary permits." Likewise, claimants "have no automatic right to engage in intensive exploration activities... For intensive exploration activities, a [Miscellaneous Land Use Permit] is required." (Nunamta Aulukestai v. State, Dep't of Natural Resources, 351 P.3d 1041, 1057 (Alaska 2015))

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purposes. Without the ability to disturb and occupy the surface for exploration and development, the mineral estate itself could not be realized.

Therefore, the locator's rights extend beyond a purely nominal or abstract mineral interest and include practical surface use rights that support prospecting, extraction, and basic processing. and include practical surface use rights that support prospecting, extraction, and basic processing. These rights are directly tied to exploration and mining activities, and the Division acknowledges that prospecting and advanced exploration—such as geologic sampling, trenching, and drilling—fall within the necessary use of the surface contemplated by statute. The applicant, as the mining claim holder, is therefore entitled to carry out reasonable surface uses to achieve the intended mineral development.

(continued on next page)

16. DISCUSSION

Great Land Minerals LLC's primary focus is on antimony exploration, which is a critical mineral considered vital to US National Defense. The project's exploration plan is to use a combination of air track drilling to identify potential areas of significant antimony mineralization, followed by trenches to expose the area to geologists and extraction of near surface target material via bulk sampling. The project has three main target areas: The Lincoln, St. Paul, and the Midnight Sun, which are located on state mining claims on Ester Dome. The objective is to further characterize the location and quality of antimony for future development considerations.

Access to the Lincoln and St. Paul target areas is via Henderson Road, approximately 2 miles north of the intersection with Gold Hill Road. The access to the Midnight Sun target area is approximately 3 miles west of the intersection with Sheep Creek Road, then over unimproved ridgetop historical mining and exploration trails leading north from the Dome for 3.14 miles. Other access routes will be constructed using a Prime Tek 300 brush mulcher to clear surface vegetation but not disturb the underlying vegetative mat. New access trails will be constructed off existing access trails using a Cat D-6 bulldozer. Driveway permits from DOT may be required prior to creating new access off DOT maintained roads. Trails will be designed to prevent erosion.

Access to the claim block is via Henderson Road, Gold Hill Road, and Sheep Creek Roads, which is a Department of Transportation and Public Facilities managed road and a part of the state highway system. The applicant has proposed self-mitigation, which involves restricting project related travel during the timeframe when school buses are picking up/dropping off students. Likewise, heavy vehicles such as semi-trucks hauling large equipment will be limited during night hours to minimize noise.

The drilling program will use a self-contained hydraulic tracked drill with an onboard dust collector. Hydraulic tracked drills are small and require no additives or water to operate. Drill mechanisms collect rock chips and dust. The drill holes will be assessed by geologists and guide field staff in determining the perimeters for trenches. Drill holes will be backfilled with bentonite clay and drill cutting to form a permanent seal. No standpipes will be left at the drill sites upon completion. No drill pads or surface preparations are required or requested.

After drilling has identified a target area, a CAT 325 or similar tracked excavator with backhoe configuration will be transported via low-boy truck, where it can be safely walked to the target area. The excavator will proceed to construct a trench, exposing bedrock for geological assessment and geochemical sampling. Bulk samples of mineralization will be extracted for metallurgical and recovery assessment. Material excavated for bulk sample testing will be transported by medium sized dump truck to an offsite area for sorting and bagging.

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The ADF&G and USFWS were consulted during the agency comment period. The Division did not receive any agency comments; however, the Division will include a standard stipulation for eagle avoidance and contact information for USFWS.

The proposed operations would not impede public access to the area and would likely not impact vegetation beyond what is under the scope of this application; therefore, habitat values should remain minimal. The exploration project does not impede recreational opportunities in the area and is consistent with the management intent of the plan. The exploration activity contributes to the economic diversity of state lands by facilitating potential mineral development without impacting habitat and is therefore consistent with the management intent of the plan.

This area has been characterized by significant mining activity and is considered to have high grade mineralization. Further development of subsurface resources is expected during the planning period. The overall footprint of the project is consistent with an advanced exploration program and has been adequately bonded. Since the proposed activities are low-risk and utilize a small footprint, impacts to state land are expected to be minimal. No alternatives to the proposed activity were considered. Since the proposed activities are low-risk and utilize a small footprint, impacts to state land are expected to be minimal. No alternatives to the proposed activity were considered.

The detailed Response to Comments document is incorporated by reference and forms an integral part of this discussion, providing comprehensive responses to public concerns and supporting the Department's reasoned decision-making process.

17. DETERMINATION

The Division has determined it appropriate to issue a stipulated Plan of Operations Approval³ to conduct Hardrock Exploration and Reclamation activities on lands owned by the State of Alaska.

The applicant is advised to review authorization documents carefully as well as the regulations under AS 27.19 (Reclamation), AS 38.05 (Alaska Land Act), 11 AAC 86 (Mining Rights), 11 AAC 96 (Miscellaneous Land Use), and 11 AAC 97 (Reclamation).

The Plan of Operations Approval is being executed and issued concurrently with this Memorandum of Decision.



Authorized Officer

David Charron, Geologist 5

9/19/2025

Date

³ Effective from the date of issuance until October 15, 2030, unless extended according to 11 AAC 86.800(d).

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18.APPEAL

An eligible person affected by this decision may appeal to the DNR Commissioner per AS 44.37.011 and 11 AAC 02. Any appeal must be received within twenty (20) calendar days after issuance of this decision under 11 AAC 02.040. An eligible person must first appeal a decision to the Commissioner before seeking relief in superior court. The Alaska Court System establishes its own rules for timely appealing final administrative orders and decisions of the department. Appeals may be mailed or hand-delivered to the DNR Commissioner's Office, 550 W. 7th Avenue, Suite 1400, Anchorage, Alaska, 99501; or faxed to (907)-269-8918; or sent by electronic mail to dnr.appeals@alaska.gov. Appeals must be accompanied by the fee established in 11 AAC 05.160(d)(1)(F), which has been set at \$200 under the provisions of 11 AAC 05.160 (a)-(b). A copy of 11 AAC 02 is available on the department's website at <https://dnr.alaska.gov/mlw/pdf/DNR-11-AAC-02.pdf>.

19. MEMORANDUM OF DECISION ATTACHMENTS

Attachment A- Response to Public Comments

Issued Plan of Operations Approval APMA F20252955