J. E. STOVER & ASSOCIATES, INC.

2352 NORTH 7TH STREET, UNIT B GRAND JUNCTION, COLORADO 81501 PHONE: (970) 245-4101, FAX: (970) 242-7908

MINE ENGINEERING MINE RECLAMATION CIVIL ENGINEERING CONST. MANAGEMENT

April 21, 2022

Rob Zuber Division of Reclamation, Mining & Safety 1313 Sherman St., Room 215 Denver, CO 80203

Re: Bowie Resources, LLC, Bowie No. 2 Mine MR-205, Update Operations and Control Adequacy Response #3 Permit C-1996-083

Dear Mr. Zuber:

DRMS' letter dated December 3, 2021 transmitted its adequacy review for the referenced minor revision. On behalf of Bowie Resources, LLC following are its responses to the DRMS's comments and concerns.

1. **DRMS:** Please check the starting dates and ending dates for all of the officers and directors. For example, the starting date for Mr. Grech as CEO of Wolverine Fuels, LLC is 10/15/2018 in the AVS system, but you have 7/16/2018 in your submittal for MR-205.

BRL: Dates have beenchanged to 10/15/21

2. **DRMS:** According to the AVS records, Carson Pollastro should be listed for Wolverine Fuels Holding, LLC and for Wolverine Fuels Parent, LLC. Do you have an end date for him (for both entities)?

BRL: There is no end date, he is still an active officer.

3. **DRMS:** According to the AVS records, several people should be listed for Galena U.S. Holdings, Inc. These include James Wolf, Eugene Diclaudio, and Carlos Pons. Please add these individuals to your list or provide end dates for each.

BRL: Please see attached letter. Mr. Wolf and Mr. DiClaudio have never been part of Galena Holdings.

4. **DRMS:** Also for Galena U.S. Holdings, Inc., you have an end date for Andy Smolenack

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(9/30/2017) that we do not have. Are you certain that is correct?

BRL: According to information supplied by Bowie Corporate, it has been updated to 03/25/18.

The Operations and control in its entirety is attached. Please see revised **pages 2.03-23 through 2.03-31**.

Please let me know if you have any additional questions.

Sincerely,

Tamme Bishop

Tamme Bishop, P.E. Project Engineer

Cc: Basil Bear



9815 South Monroe Street – Suite 203 Sandy, UT 84070

January 14, 2022

Mr. Rob Zuber Environmental Protection Specialist Colorado Division of Reclamation, Mining and Safety 1001 E 62nd Avenue Denver, CO 80216

RE: Correction of AVS listing of Ownership and Control for Galena US Holdings, Inc. Wolverine Fuels, LLC, Bowie #2 Mine

Dear Mr. Zuber:

It has been brought to my attention that you have found an error in the Office of Surface Mining Reclamation and Enforcement Applicant Violator System (AVS) that states Mr. James Wolf and Mr. Eugene DiClaudio are listed as having been part of the ownership and control of Galena US Holdings, Inc. These two gentlemen have never been or are not currently members or officers of Galena US Holdings, Inc. in any way shape or form. Also, neither person is currently associated with Wolverine Fuels, LLC, a subsidiary of Galena US Holdings, Inc and owner of Bowie Resources, LLC. Mr. James Wolf and Mr. Eugene DiClaudio left the employ of Bowie Resources/Wolverine Fuels in 2018 and have not had association with the Company since they left.

If you have any questions about this issue, please do not hesitate to call me at 801 695-9142.

Sincerely

Marc Maglione Chief Financial Officer Wolverine Fuels, LLC

Marc Maglione Chief Financial Officer Office: (801) 695-9178

ID_AVS			BEGIN	N
SSN FEIN	OFFICER	TITLE	DATE	DATE
	Carson Pollastro	Chief Executive Officer	05/21/21	
	Marc Maglione	Chief Financial Officer	9/12/18	
	Carson Pollastro	Chief Operating Officer	10/28/19	
	NO DIRECTORS			
	OWNERSHIP			
	Wolverine Fuels Hold	ing, LLC 100%		
	End Date			
	James J. Wolff	Chief Financial Officer	10/24/17	9/12/1
	Eugene DiClaudio	Chief Executive Officer	10/24/17	7/16/1
	Eugene DiClaudio	Chief Operating Officer	10/24/17	7/16/1
	Carlos Pons	Co-CEO	04/10/17	7/16/2
	Brian Settles	SR Vice President	8/28/13	1/1/201

Wolverine Fuels, LLC fka Bowie Holdings, LLC 9815 South Monroe Street, Suite 203 Sandy, Utah 84070 PHONE (801) 695-9107 A Delaware Limited Liability Company

		а	nd		
ID_AVS					BEGIN END
SSN FEIN	OFFICER		TITLE	DATE	DATE
	Carson Pollastro		Chief Executive Office	r	5/21/21
	Marc Maglione		Chief Financial Officer		9/12/18
	Carson Pollastro		Chief Operating Office	r	10/28/19
	Marc Maglione		Secretary		01/01/22
	DIRE	CTORS:			
	Jesus Fernandez			10/24/1	17
	Carlos Pons			10/24/1	17
	Control Holding Co	ompany			
	Galena US Holdings,	Inc.	98.3605%		
	End Date				
	James J. Wolff	Chief F	inancial Officer	08/28/1	13 9/12/18
	Eugene DiClaudio	Chief E	xecutive Officer	04/10/1	17 7/16/18
	Eugene DiClaudio	Chief O	perating Officer	08/28/1	13 7/16/18
	Carlos Pons	Co-CEO	C	04/10/1	17 7/16/18
	Brian Settles	SR Vice	e President	8/26/13	3 1/1/2019
	Corey Heaps	VP, Op	erations	7/16/18	3 10/31/18
	Brian Settles	Secreta	ry/General Counsel	08/26/1	13 12/31/21
	James Grech	CEO/D	irector	10/15/1	18 5/21/21

Wolverine Fuels Holding, LLC fka Bowie Resource Holdings, LLC 9815 South Monroe Street, Suite 203 Sandy, Utah 84070 PHONE (801) 695-9107 EIN 46-3211240 A Delaware Limited Liability Company

ID_AVS SSN FEIN	OFFICER	TITLE DAT		END
	Carlson Pollastro	Chief Executive Office	er 5/21/21	
	Carlson Pollastro	Chief Operating Office	er 10/28/19	9
	Marc Maglione	Chief Financial Office	r 9/12/18	
	Marc Maglione	Secretary	1/1/22	
	NO DIRECTORS			
	Ownership			
	Wolverine Fuels Pare	ent, LLC 100%		
	End Date			
	James J. Wolff	Chief Financial Officer	10/24/17	9/17/ ⁻
	Eugene DiClaudio	Chief Executive Officer	10/24/17	7/16/*
	Eugene DiClaudio	Chief Operating Officer	10/24/17	7/16/ ⁻
	Carlos Pons	Co-CEO	04/10/17	7/16/ [,]
	Brian Settles	SR Vice President	08/28/13	1/1/20 ⁻
	James Grech	Chief Executive Officer	7/16/18	5/21/2

Officers and Directors

MR-205

Wolverine Fuels Parent, LLC fka Bowie Resource Partners, LLC 9815 South Monroe Street, Suite 203 Sandy, Utah 84070 PHONE (801) 695-9107 EIN 61-1717862 A Delaware Limited Liability Company

ID_AVS			BEGIN END		
SSN FEIN	OFFICER	TITLE DA	ΛΤΕ	DATE	
	Carlson Pollastro	Chief Executive Of	ficer	5/21/21	
	Carlson Pollastro	Chief Operating Of	ficer	10/28/19	
	Marc Maglione	Chief Financial Offi	cer	9/12/18	
	Marc Maglione	Secretary		1/1/22	
	NO DIRECTORS				
	Ownership				
	Wolverine Fuels, LLC	00%			
	End Date				
	James J. Wolff	Chief Financial Officer	08/28/13	9/12/18	
	Eugene DiClaudio	Chief Executive Officer	04/10/17	7/16/18	
	Eugene DiClaudio	Chief Operating Officer	08/28/13	7/16/18	
	Carlos Pons	Co-CEO	04/10/17	7/16/18	
	Brian Settles	SR Vice President	08/23/13	1/1/2019	
	Brian Settles	Secretary/General Counsel	08/23/13	12/31/202	
	James Grech	Chief Executive Officer	7/16/18	5/21/21	

Officers and Directors

Galena US Holdings, Inc. 1400 McKinney Street, Suite 1500 Houston, TX 77010

FEIN N/A PHONE N/A

Officers and Directors				
ID_AVS SSN FEIN	OFFICER TITLE		BEGIN E DATE D	
	OFFICERS: Corey Prologo	President	08/31/2016	03/25/2018
	Reappointed		03/26/2018	
	DIRECTORS:			
	Corey Prologo		8/01/2016	03/25/2018
	Reappointed		03/26/2018	
	Control Holding Cor			
	Galena Investments Lin	nited 100%		
	END DATED:			
	Andy Smolenack		08/16/2013	3/25/2018

Galena Investments Limited

Gzira Malta

	Officers	Officers and Directors			
ID_AVS SSN FEIN	OFFICER	TITLE	BEG DATE	IN END DATE	
	OFFICERS:				
	Walter Catajak Cutajar	Secretary	02/28/2012		
	DIRECTORS:				
	Walter Catajak Cutajar		02/28/2012		
	Mark Joseph Irwin		02/28/2012		
	Robbert Alexander Maas		02/28/2012		
	Maryanne Inguanez		03/01/2017		

Control Holding Company

Galena Private Equity Resources Investments LP 100%

Galena Private Equity Resources Investment LP

FEIN NA PHONE 1-345-925-8365

Ugland House Georgetown, Grand Cayman KY 1-1104 Cayman Islands EIN 98-1389329

ID_AVS SSN OFFICER TITLE FEIN	E DATE	BEGIN END DATE

General Partner

Galena Private Equity Resources Limited

06/26/2013

Figure 1-1B ORGANIZATIONAL CHART OF WOLVERINE FUELS HOLDING, LLC AS OF OCTOBER 2018 Thru MARCH 2022



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