

INTERIOR BOARD OF LAND APPEALS

Production Industries Corp.

138 IBLA 183 (February 18, 1997)

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PRODUCTION INDUSTRIES CORP.

IBLA 94! 29

Decided February 18, 1997

Appeal from a decision of the Utah State Office, Bureau of Land Management, declaring unpatented oil shale placer mining claims abandoned and void and returning tendered filing for the claims. UMC! 115424, et al.

Reversed.

1. Mining Claims: Abandonment–Oil Shale: Mining Claims

The holder of a valid oil shale mining claim, for which a patent application was not filed and accepted for processing by Oct. 24, 1992, was required by sec. 2511(d) of the Energy Policy Act of 1992, 30 U.S.C. § 242(d) (1994), to file a notice of election either to proceed to patent or maintain the claim within 180 days from receipt of notice to do so from BLM or the claim would be conclusively deemed abandoned and void by operation of law. A notice of election timely filed will be deemed sufficient to avoid the adverse consequences of the statute even though, where it is submitted on behalf of a corporation, it is not signed by an authorized corporate official.

APPEARANCES: Carl Wuest, President, Production Industries Corporation, Provo, Utah, for appellant; David K. Grayson, Esq., Office of the Regional Solicitor, U.S. Department of the Interior, Salt Lake City, Utah, for the Bureau of Land Management.

OPINION BY ADMINISTRATIVE JUDGE PRICE

The Production Industries (formerly Paradox Production) Corporation (PI) has appealed from a decision of the Utah State Office, Bureau of Land Management (BLM), dated September 23, 1993, declaring 274 unpatented oil shale placer mining claims (UMC! 115424, et al.) abandoned and void by operation of law for failure to file a proper notice of election for the

claims pursuant to section 2511(d) of the Energy Policy Act of 1992 (EPA), 30 U.S.C. § 242(d) (1994), and returning a filing tendered pursuant to that statute. ^{1/}

By letter dated December 11, 1992, the Utah State Office informed PI, then record title owner of the mining claims involved here, ^{2/} that section 2511 of the EPA, 30 U.S.C. § 242 (1994), enacted on October 24, 1992, had established "new procedures" for maintaining and patenting such claims applicable to all unpatented oil shale placer mining claims. The letter was accompanied by a copy of a notice, which had been published in a newspaper of general circulation in the area of the claims, that detailed the new statutory requirements, as well as a copy of the legislation itself. In pertinent part, the notice stated:

Within 180 days from the date of receipt of a notice, a holder of a valid oil shale mining claim for which a patent application was not filed and accepted for processing by the Department of the Interior prior to October 24, 1992, shall file with the Secretary [of the Interior] a notice of election to: (a) proceed to limited patent or (b) maintain the unpatented claim. Failure to file the notice of election shall be deemed conclusively to constitute an abandonment of the claim by operation of law.
[Emphasis in original.]

(Notice to Oil Shale Mining Claimants at 1). BLM regarded its December 1992 letter as the required statutory notice to PI, which triggered the requirement to file a notice of election. It stated therein: "[I]f you have not applied for a patent * * * by October 24, 1992, you must file a [notice of] election in this office to either apply for a limited patent or * * * maintain the claims * * * within 180 days from the receipt of this notice" (Letter to PI, dated Dec. 11, 1992). The letter was received by PI at its record address on December 17, 1992. Thus, BLM regarded June 15, 1993, as the deadline for filing the notice of election.

^{1/} A list of the affected claims, all of which are situated in Duchesne and Utah counties, Utah, is attached as an Appendix. All of the claims were located prior to Feb. 25, 1920, the date of enactment of section 37 of the Mineral Leasing Act, ch. 85, 41 Stat. 451 (1920), codified as amended at 30 U.S.C. § 193 (1994), which banned the continued location of such claims under the general mining laws in favor of leasing of oil shale deposits. Notices of the various locations were filed for recordation with BLM on Sept. 21, 1979.

^{2/} During the pendency of the instant appeal, the Board was provided with evidence that all of the claims are now owned entirely by Jerry D. Grover, Jr., d.b.a Kingston Rust aka Kingston Rust Development. See "Affidavit of Annual Assessment Labor," dated Dec. 3, 1994. However, there is nothing to indicate that the claims were not at all relevant times owned by PI.

On May 11, 1993, the Utah State Office received a letter dated May 5, 1993, entitled "Notice of Election under Protest." It was not signed, but bore the heading "Production Industries Corp." and was contained in an envelope bearing the address of Jerry D. Grover, Jr. (P.O. Box 2113, Provo, Utah 84603) (Letter to BLM from Grover, dated Dec. 14, 1992). ^{3/} Though challenging the requirement to file a notice, the letter stated, in relevant part:

On December 17, 1992, [PI] received a notice involving Section 2511 of the [EPA] for claims listed in Exhibit A.

* * * * *

For purposes of complying with the purportedly required election, [PI] hereby elects to apply for limited patent under protest for claims listed in Exhibit A and any other affected claims to which [PI] owns an interest[.] [Emphasis added.]

(Letter to BLM, dated May 5, 1993, at 1! 2). Exhibit A consisted of a list of all of the oil shale mining claims involved here.

In its September 1993 decision, BLM declared all of the claims encompassed by the May 1993 filing abandoned and void by operation of law because, though timely, PI had failed to submit an acceptable notice of election under section 2511(d) of the EPA in that it was "not signed and executed by an authorized officer of the corporation" (Decision at 1). BLM reasoned:

In the absence of any signature, the [BLM] has no way to know whether the person who filed the document has authority to represent the corporation involved. Documents which are required by law to be filed to protect or establish legal rights, filed by a corporation, are unacceptable [to] the Department unless they are duly executed by an authorized officer of the corporation involved.

Id. The notice was returned as unacceptable. PI timely appealed from the September 1993 BLM decision.

In its statement of reasons for appeal (SOR), appellant principally contends that BLM improperly declared its oil shale mining claims abandoned and void pursuant to section 2511(d) of the EPA because the May 1993 letter was an acceptable notice of election, even in the absence of a signature, but in fact the notice was executed by an authorized officer of the corporation and sent to the Utah State Office. ^{4/} Appellant submits as "Exhibit

^{3/} On Aug. 13, 1993, PI formally notified BLM that its record address was thereafter to be Grover's address.

^{4/} Appellant also contends that the Department of the Interior lacks jurisdiction to declare 117 of its mining claims abandoned and void where they are "located on lands that have been previously transferred by the

C" a copy of the May 5, 1993, letter to which is appended a page that bears the signature of Carl Wuest, who is identified elsewhere in the record as the President of PI, on behalf of the corporation and notarized as having been signed on May 5, 1993. Appellant asserts that BLM must have "lost the signature page which was the third and final page [of the May 1993 letter]" (SOR at 6). 5/

[1] Section 2511 of the EPA, which was enacted by Congress on October 24, 1992, established new requirements with respect to the maintenance and eventual patenting of all oil shale mining claims. For claimants who had filed an acceptable patent application by October 24, 1992, but who had not received the first half final certificate for patent by that date, the Act provided for the issuance of a limited patent. Those who had filed an application and received a first half final certificate for patent by October 24, 1992, could receive full patent. 6/ 30 U.S.C. § 242(b), (c)(1) (1994). In the case of other holders of valid claims, the Act then provided:

Notwithstanding any other provision of law, within 180 days from the date of which the Secretary [of the Interior] provided notice * * *, 7/ a holder of a valid oil shale mining claim for

fn. 4 (continued)

U[nited] S[tates] to private individuals, the State of Utah, Indian tribes or others" (SOR at 2). No proof in support of that contention has been offered or provided. However, BLM admits on appeal that 142 of the 274 claims involved in this appeal are located on public land, 21 on lands that are a mix of conveyances and retained Federal ownership, and 111 on lands conveyed out of Federal ownership, a portion of which was conveyed subject to a retained interest in the mineral estate (Answer at 2). The situation is less than clear. In any event, the Department's and this Board's jurisdiction is limited to adjudicating the validity of the claims where the surface and/or mineral estate is owned by the United States, and our decision here is so limited. Rosander Mining Co., 84 IBLA 60, 62! 63, 63 n.2 (1984). Upon receipt of this case, BLM should determine the extent of the Department's jurisdiction and take appropriate action in accordance therewith.

5/ Appellant also submits a copy of a return receipt card addressed to BLM's Utah State Office, presumably signed by a BLM employee on May 11, 1993, the date of its receipt of the May 1993 letter (Exh. C attached to SOR at 4). The receipt card does not, however, establish that an executed version of the May 1993 letter was sent to, or received by, BLM.

6/ Limited patents, unlike full patents, provide for retention of title to the surface estate, along with oil, gas, coal, and all minerals other than oil shale and associated minerals, in the United States, subject to the right of the patentee to engage in a restricted surface use. See 30 U.S.C. § 242(c)(1) (1994).

7/ Section 2511(a) of the EPA required the Secretary, within 60 days from Oct. 24, 1994, to provide notice of the requirements of the Act to holders of unpatented oil shale mining claims. See 30 U.S.C. § 242(a) (1994). Notice was to be by registered mail and publication in a newspaper of general circulation in the area where the claims were located.

which a patent application was not filed and accepted for processing by the Department of the Interior prior to October 24, 1992, shall file with the Secretary a notice of election to! !

(A) proceed to limited patent as provided in subsection (e)(1) of this section [i.e., section 2511]; or

(B) maintain the unpatented claim as provided for in subsection (e)(2) of this section. [Emphasis added.]

30 U.S.C. § 242(d)(1) (1994). Finally, the Act provided that the "[f]ailure to file the notice of election * * * shall be deemed conclusively to constitute an abandonment of the claim by operation of law." 30 U.S.C. § 242(d)(2) (1994).

All of the subject claims are those for which a patent application had not been filed and accepted for processing by the Department prior to October 24, 1992, the date of enactment of the EPA. Thus, appellant was required by section 2511(d)(1) of that Act to file a notice of election. The question presented is whether the unsigned May 1993 letter filed with BLM constituted a proper notice that thus satisfied the statute.

No particular form or content for the "notice of election" required by section 2511(d)(1) of the EPA is specified in the statute. 30 U.S.C. § 242(d)(1) (1994). No regulations were promulgated by the Department to implement the statute. Nonetheless, BLM asserts that the failure to have an authorized officer of a corporate holder of an oil shale mining claim execute the required notice renders it fatally defective, thus properly resulting in the claim being deemed abandoned and void by operation of law. We cannot agree.

As stated, section 2511(d)(1) of the EPA does not require that a corporation's notice of election shall be executed by an authorized corporate official. It simply states that the "holder of a valid oil shale mining claim * * * shall file with the Secretary a notice of election to * * * (A) proceed to limited patent * * *; or (B) maintain the unpatented claim[.]" 8/ 30 U.S.C. § 242(d)(1) (1994) (emphasis added). Thus, what

8/ Appellant also contends that the requirement to file a notice of election in any event was not triggered where BLM failed to properly notify mining claimants of the requirements of the EPA. Appellant argues that the December 1992 notice was not effective because the published version was not signed by an authorized BLM official and because it constituted a rule that was not promulgated in accordance with the requirements of the Administrative Procedure Act (APA), 5 U.S.C. § 553 (1994). There is no question that the notice comported with section 2511(a) of the EPA, 30 U.S.C. § 242(a) (1994), setting forth the requirements of the Act almost verbatim as it did. Id. In no sense was the notice a rule that was subject to rulemaking under the APA. Indeed, Congress provided only for personal service and newspaper publication of the notice. Signature by an

the EPA requires was done when PI's notice of election was filed with BLM. No regulations generally implementing section 2511(d)(1) of the EPA had been promulgated, let alone a specific requirement regarding the manner of such execution. Moreover, the notice provided to appellant in December 1992 did not specify that a notice of election submitted by a corporation must be executed by an authorized corporate official. See Letter to PI, dated Dec. 11, 1992; Notice to Oil Shale Mining Claimants.

We therefore find inapposite those cases cited by BLM in its September 1993 decision. See Decision at 2 (citing Superior Oil Co. v. Udall, 409 F.2d 1115, 1116! 17, 1121 (D.C. Cir. 1969), and Shaw Resources, Inc., 79 IBLA 153, 177 n.10, 91 I.D. 122, 136 n.10 (1984)). In those cases, noncompetitive applications and competitive bids for oil and gas leases were deemed unacceptable in the absence of a proper signature, and at the time of Shaw, Departmental regulations specifically required signed applications on approved forms with a signature line. See 43 CFR 3102.4 and 3112.2! 1(a) (1983). This was also the case in Superior Oil, supra. See 43 CFR 3382.4(a)(1) (1968); Superior Oil Co. v. Udall, 409 F.2d at 1119. To similar effect, see KVK Partnership v. Hodel, 759 F.2d 814, 817 (10th Cir. 1985); Satellite 8309220, 87 IBLA 93 (1985); Richard S. Talbert, 70 IBLA 145 (1983); Sandy C. Baicy, 46 IBLA 140, 141 (1980). There is no comparable regulation here. Further, the present case involves an effort to protect rights obtained from the United States by virtue of mineral locations, rather than to acquire new rights. We find no public policy reason for barring appellant from doing so. Compare with Superior Oil Co. v. Udall, supra, 409 F.2d at 1119! 20.

Moreover, it is now well established that statutes that impose a forfeiture for noncompliance must be strictly construed. Harvey A. Clifton, 60 IBLA 29, 34 (1981) (citing 3 Sutherland Statutory Construction §§ 59.02, .03 (4th ed. 1974)). We are thus not inclined to find that a mining claim is abandoned and void and therefore forfeited in the absence of lack of compliance with the statute itself.

Accordingly, we have held that BLM may not declare a mining claim abandoned and void by operation of law where, despite compliance with section 314 of the Federal Land Policy and Management Act of 1976 (FLPMA), 43 U.S.C. § 1744 (1994), a claimant has failed to comply with a requirement that appears only in the statute's implementing regulations, since the conclusive presumption of abandonment attends only noncompliance with the statute. Harvey A. Clifton, 60 IBLA at 33-34, and cases cited therein. As the circuit court said in Topaz Beryllium Co. v. United States, 649 F.2d 775, 778 (10th Cir. 1981): "[W]e hold that once on notice [of a claim], the Secretary cannot deem a claim abandoned merely because the * * * filings required only by [regulation]! ! and not by the statute! ! are not

fn. 8 (continued)

authorized official was not required, and we have no authority to declare the actions of BLM in this respect unconstitutional. Laguna Gatuna, Inc., 131 IBLA 169, 173 (1994).

made." Instead, BLM must treat the failure as a curable defect of which the claimant must receive notice and an opportunity to comply prior to a declaration of forfeiture. See Harvey A. Clifton, 60 IBLA at 34.

Section 314 of FLPMA establishes requirements to file certain instruments concerning unpatented mining claims generally (see 43 U.S.C. § 1744(a) and (b) (1994)), and provides that the "failure to file such instruments * * * shall be deemed conclusively to constitute an abandonment of the mining claim." 43 U.S.C. § 1744(c) (1994). In such cases, we have held that where an action complies with the express language of the statute, but does not comply with an implementing regulation, the harsh consequence of forfeiture will not be imposed. Harvey A. Clifton, 60 IBLA at 33! 34. That should be the result here. In the absence of an implementing regulation, we will not hold that the notice submitted by appellant failed to comply with the broad language of the statute.

BLM regards the signature of an authorized corporate official as essential to the authenticity and/or efficacy of the notice of election submitted by appellant. See Answer at 3! 4. We find no fault with this. 9/ See KVK Partnership v. Hodel, 759 F.2d at 817. As BLM recognizes, a signature is only a first step in determining whether an election is that of the corporation, since BLM would then have to require proof that the official in fact is authorized to act on behalf of the corporation in matters of the kind here at issue. Again, there is nothing wrong with BLM's pursuit of such information. See Churchill Corp., 27 IBLA 234 (1976). Clearly, BLM may require evidence of the authority of the individual to sign the notice on behalf of the corporation by requiring a relevant corporate resolution or other proof. Cf. Conway v. Watt, 717 F.2d 512, 517 (10th Cir. 1983) (Department can require oil and gas lease applicant to demonstrate that signature made on qualifying date). What BLM can

9/ The importance of a signature is well! demonstrated in Ben Cohen, 103 IBLA 316 (1988), aff'd in part sub nom. Sahni v. Watt, No. CV! LV! 83! 96! HDM (D. Nev. Jan. 17, 1990), aff'd, (Jan. 14, 1991), aff'd, No. 91-15398 (9th Cir. Apr. 27, 1992), cited by BLM, wherein we affirmed BLM's rejection of an application seeking title to public lands in satisfaction of homestead rights purportedly acquired in the previous century by the applicants' predecessor! in! interest. We did so in part because, even assuming such acquisition, the applicants had failed to establish that an assignment of those rights in fact had occurred early in their chain of title. Id. at 336. This finding hinged on the fact that the assignment was unsigned, and thus there was no proof that their predecessor! in! interest had ever subscribed to the assignment. Id. at 335, 336. No such proof could be obtained. Aside from the obvious difference that the instant case does not involve an immediate effort to obtain title from the United States, it must be distinguished by the fact that the Department can obtain proof that the holder of the claims subscribed to the statutory election.

not do is simply declare the claims abandoned and void. Cf. id. (Department cannot per se disqualify oil and gas lease application for lack of signature date). BLM should have treated appellant's failure to provide a signed notice as a curable defect and afforded appellant notice and an opportunity to submit a properly executed notice. Cf. Turner C. Smith, Jr., 66 IBLA 1, 8! 9, 89 I.D. 386, 389! 90 (1982), and First Mississippi Corp., 62 IBLA 184, 186 (1982) (oil and gas lease offers and bids).

In these circumstances, we decline to hold that Congress intended the severe consequences of the statute to apply to a timely notice of election, which, regardless of its other deficiencies, unambiguously states an election to apply for limited patent was filed timely.

In view of our disposition of the case, we need not address or otherwise resolve the questions presented by appellant. 10/

We therefore hold that BLM's September 1993 decision improperly rejected appellant's notice of election pursuant to section 2511(d) of the EPA and erred in declaring appellant's oil shale placer mining claims abandoned and void for failure to file an acceptable notice of election.

Accordingly, pursuant to the authority delegated to the Board of Land Appeals by the Secretary of the Interior, 43 CFR 4.1, the decision appealed from is reversed.

T. Britt Price
Administrative Judge

I concur.

Franklin D. Amess
Administrative Judge

10/ BLM has requested that we forward the case to the Office of the Inspector General of the Department so that it may determine whether the signature page appellant produced on appeal is genuine, and, if it is not, to refer this matter to the U.S. Department of Justice for possible criminal prosecution under 18 U.S.C. § 1001 (1994), which forbids knowingly presenting a false document to an agency of the United States. We took this motion under advisement in a Mar. 21, 1994, order. We now find no reason for referral in view of appellant's explanation for its mistaken belief that this page was in fact appended to the May 1993 notice (Motion to Quash at 1). BLM's request is denied.

APPENDIX

BLM		BLM			
<u>Serial Number</u>	<u>Claim Number</u>	<u>Serial Number</u>	<u>Claim Number</u>		
UMC!	115424	Apache No. 1	UMC!	115425	Apache No. 2
UMC!	115426	Apache No. 3	UMC!	115427	Apache No. 4
UMC!	115428	Apache No. 5	UMC!	115429	Apache No. 6
UMC!	115430	Apache No. 7	UMC!	115431	Apache No. 8
UMC!	115432	Apache No. 9	UMC!	115433	Apache No. 10
UMC!	115434	Argyle No. 1	UMC!	115438	Victor
UMC!	115439	Victor No. 1	UMC!	115440	Victor No. 2
UMC!	115441	Victor No. 3	UMC!	115442	Victor No. 4
UMC!	115443	Victor No. 5	UMC!	115444	Victor No. 6
UMC!	115445	Victor No. 7	UMC!	115446	Victor No. 8
UMC!	115447	American No. 1	UMC!	115448	American No. 2
UMC!	115449	American No. 5	UMC!	115450	American No. 6
UMC!	115451	American No. 7	UMC!	115452	American No. 8
UMC!	115453	American No. 9	UMC!	115454	American No. 10
UMC!	115455	Walters Claim	UMC!	115456	Walters No. 1
UMC!	115457	Walters No. 2	UMC!	115458	Walters No. 3
UMC!	115459	Walters No. 4	UMC!	115460	Walters No. 5
UMC!	115461	Walters No. 6	UMC!	115462	Walters No. 7
UMC!	115463	Walters No. 8	UMC!	115472	Harmon No. 9
UMC!	115473	Harmon No. 10	UMC!	115474	Harmon No. 11
UMC!	115475	Harmon No. 12	UMC!	115476	Harmon No. 13
UMC!	115477	Harmon No. 14	UMC!	115478	Harmon No. 15
UMC!	115479	Harmon No. 16	UMC!	115480	Harmon No. 17
UMC!	115481	Harmon No. 18	UMC!	115482	Harmon No. 19
UMC!	115483	Harmon No. 20	UMC!	115484	Harmon No. 21
UMC!	115485	Harmon No. 22	UMC!	115486	Harmon No. 23
UMC!	115487	Harmon No. 24	UMC!	115488	Harmon No. 25
UMC!	115489	Harmon No. 26	UMC!	115490	Harmon No. 27
UMC!	115491	Harmon No. 28	UMC!	115492	Harmon No. 29
UMC!	115493	Harmon No. 30	UMC!	115494	Harmon No. 31
UMC!	115495	Harmon No. 32	UMC!	115496	Harmon No. 33
UMC!	115497	Harmon No. 34	UMC!	115498	Harmon No. 35
UMC!	115499	Harmon No. 36	UMC!	115500	Harmon No. 37
UMC!	115501	Harmon No. 38	UMC!	115502	Provo No. 1
UMC!	115503	Provo No. 2	UMC!	115504	Provo No. 3
UMC!	115505	Provo No. 4	UMC!	115506	Provo No. 5
UMC!	115507	Provo No. 6	UMC!	115508	Provo No. 7
UMC!	115509	Provo No. 8	UMC!	115510	Provo No. 9
UMC!	115511	Provo No. 10	UMC!	115512	Long Jump
UMC!	115513	Wilson	UMC!	115514	Dock Waliper
UMC!	115515	Horse Canyon	UMC!	115516	Buchanan
UMC!	115517	Coyote	UMC!	115518	Startup
UMC!	115519	Grey Bud No. 4	UMC!	115520	Sunflower No. 1
UMC!	115521	Sunflower No. 2	UMC!	115522	Sunflower No. 3
UMC!	115523	Sunflower No. 4	UMC!	115524	Hazard No. 1
UMC!	115525	Hazard No. 2	UMC!	115526	Quin No. 1
UMC!	115528	Quin No. 3	UMC!	115530	Quin No. 5

BLM		BLM			
<u>Serial Number</u>	<u>Claim Number</u>	<u>Serial Number</u>	<u>Claim Number</u>		
UMC!	115531	Quin No. 6	UMC!	115532	Quin No. 7
UMC!	115533	Quin No. 8	UMC!	115534	Quin No. 9
UMC!	115535	Quin No. 10	UMC!	115536	Quin No. 11
UMC!	115537	Quin No. 12	UMC!	115538	Hazel
UMC!	115539	Hazel No. 1	UMC!	115540	Hazel No. 2
UMC!	115541	Hazel No. 3	UMC!	115542	Hazel No. 4
UMC!	115543	Hazel No. 5	UMC!	115545	Hazel No. 7
UMC!	115546	Hazel No. 8	UMC!	115547	Hazel No. 9
UMC!	115548	Hazel No. 10	UMC!	115549	Hazel No. 11
UMC!	115550	Hazel No. 12	UMC!	115551	Hazel No. 13
UMC!	115552	Hazel No. 14	UMC!	115553	Hazel No. 15
UMC!	115554	Hazel No. 16	UMC!	115555	Hazel No. 17
UMC!	115556	Andy No. 1	UMC!	115557	Andy No. 2
UMC!	115558	Andy No. 3	UMC!	115559	Andy No. 4
UMC!	115560	Grey Bird No. 2	UMC!	115561	Grey Bird No. 3
UMC!	115562	Shaw No. 1	UMC!	115563	Shaw No. 2
UMC!	115564	Shaw No. 3	UMC!	115566	Shaw No. 5
UMC!	115567	Shaw No. 6	UMC!	115568	Shaw No. 7
UMC!	115569	Shaw No. 8	UMC!	115570	Greene Placer
UMC!	115571	Green Placer No. 1	UMC!	115572	Greene No. 2 Placer
UMC!	115573	Green Placer No. 3	UMC!	115574	Greene No. 4
UMC!	115575	Greene No. 5	UMC!	115576	Greene No. 6 Placer
UMC!	115577	Greene No. 7 Placer	UMC!	115578	Greene No. 8 Placer
UMC!	115579	Greene Placer No. 9	UMC!	115580	Greene Placer No. 10
UMC!	115581	Greene Placer No. 11	UMC!	115582	Greene Placer 12
UMC!	115598	Stevens No. 2	UMC!	115600	Stevens No. 4
UMC!	115604	Utah	UMC!	115605	Black Crow
UMC!	115608	Carey	UMC!	115609	Edna
UMC!	115611	John Crow	UMC!	115612	John Crow No. 1
UMC!	115613	John Crow No. 2	UMC!	115614	John Crow No. 3
UMC!	115615	John Crow No. 4	UMC!	115616	John Crow No. 5
UMC!	115617	John Crow No. 6	UMC!	115618	John Crow No. 7
UMC!	115619	Lucky Boy	UMC!	115621	Lucky Boy No. 2
UMC!	115622	Lucky Boy No. 3	UMC!	115635	Cedar
UMC!	115636	Cedar No. 2	UMC!	115637	Queen
UMC!	115638	Queen No. 1	UMC!	115643	Blue Jay
UMC!	115644	Sparrow	UMC!	115646	Thome
UMC!	115647	Rosen Lof	UMC!	115648	Banks
UMC!	115649	Woods	UMC!	115650	Jones
UMC!	115651	Turner	UMC!	115652	Snell
UMC!	115653	Wilson	UMC!	115654	Ross
UMC!	115708	Rockhill	UMC!	115710	Poison Creek
UMC!	115713	Big Ben	UMC!	115714	Zero
UMC!	115715	Oliver	UMC!	115716	May
UMC!	115717	Murry	UMC!	115718	Thralls
UMC!	115719	Blue Jay	UMC!	115720	Hoover
UMC!	115721	Robin	UMC!	115722	Eagle
UMC!	115723	Sparrow	UMC!	115724	Mustard
UMC!	115725	Wild Cat	UMC!	115726	Long Horn
UMC!	115727	Boyd	UMC!	115728	Mesa

UMC! 115729

Buckskin

UMC! 115730

Black Oil

138 IBLA 192

BLM		BLM				
<u>Serial Number</u>	<u>Claim Number</u>	<u>Serial Number</u>	<u>Claim Number</u>			
UMC!	115731	Pinion	UMC!	115732	Shale Rock	
	UMC!	115733	White Ledge	UMC!	115734	Oil Stone
	UMC!	115735	Last Chance	UMC!	115737	Dogy
	UMC!	115738	Harmon	UMC!	115739	White Ledge
UMC!	115740	Snow Storm	UMC!	115741	Bull Durham	
UMC!	115742	Mott	UMC!	115743	Indian Placer No. 1	
UMC!	115744	Indian Placer No. 2	UMC!	115745	Indian Placer No. 3	
UMC!	115746	Indian Placer No. 4	UMC!	115747	Indian Placer No. 5	
UMC!	115748	Indian Placer No. 6	UMC!	115749	Indian Placer No. 7	
UMC!	115750	Indian Placer No. 8	UMC!	115751	Indian Placer No. 9	
UMC!	115752	Indian Placer No. 10	UMC!	115753	Provo Placer No. 1	
UMC!	115754	Provo Placer No. 2	UMC!	115755	Provo Placer No. 3	
UMC!	115756	Provo Placer No. 4	UMC!	115757	Provo Placer No. 5	
UMC!	115758	Provo Placer No. 6	UMC!	115759	Provo Placer No. 7	
UMC!	115760	Provo Placer No. 8	UMC!	115761	Provo Placer No. 9	
UMC!	115762	Provo Placer No. 10	UMC!	115763	Provo Placer No. 11	
UMC!	115764	Provo Placer No. 12	UMC!	115765	Provo Placer No. 13	
UMC!	115766	Provo Placer No. 14	UMC!	115767	Provo Placer No. 15	
UMC!	115768	Provo Placer No. 16	UMC!	115769	Provo Placer No. 17	
UMC!	115770	Provo Placer No. 18	UMC!	115771	Provo Placer No. 19	
UMC!	115772	Provo Placer No. 20	UMC!	115773	Provo Placer No. 21	
UMC!	115774	Provo Placer No. 22	UMC!	115775	Provo Placer No. 23	
UMC!	115776	Provo Placer No. 24	UMC!	115777	Provo Placer No. 25	
UMC!	115778	Provo Placer No. 26	UMC!	115779	Provo Placer No. 27	
UMC!	115780	Provo Placer No. 28	UMC!	115781	Provo Placer No. 29	
UMC!	115782	Provo Placer No. 30	UMC!	115811	Cluff Claim No. 1	
UMC!	115812	Cluff Claim No. 2	UMC!	115813	Cluff Claim No. 3	
UMC!	115814	Cluff Claim No. 4	UMC!	115815	Cluff Claim No. 5	
UMC!	115816	Liberty Claim No. 1	UMC!	115817	Liberty Claim No. 2	
UMC!	115818	Liberty Claim No. 3	UMC!	115819	Liberty Claim No. 4	
UMC!	115820	Liberty Claim No. 5	UMC!	115821	Liberty Claim No. 6	
UMC!	115822	Liberty Claim No. 7	UMC!	115823	Sherman No. 4	
UMC!	115824	Sherman No. 5	UMC!	115825	Sherman No. 6	
UMC!	115826	Little Johnny No. 1	UMC!	115827	Black Diamond No. 1	
UMC!	115828	Black Diamond No. 2	UMC!	115829	Black Diamond No. 3	
UMC!	115830	Black Diamond No. 4	UMC!	115831	Black Diamond No. 5	
UMC!	115832	Black Diamond No. 6	UMC!	115833	Black Oil No. 1	
UMC!	115834	Black Oil No. 2	UMC!	115835	Raymond	
UMC!	115836	Raymond No. 1	UMC!	115837	Raymond No. 2	