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JUL 05 2013
MINERALS & MINING PROGRAM

STATE OF SOUTH DAKOTA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
BOARD OF MINERALS AND ENVIRONMENT

**IN THE MATTER OF THE LARGE SCALE MINE
PERMIT APPLICATION OF POWERTECH (USA) INC.**

**SABRINA KING'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO**

Powertech (USA), Inc.

TO: POWERTECH (USA), INC.

YOU AND EACH OF YOU PLEASE TAKE NOTICE AND BE ADVISED:

That the Intervenor, Sabrina King, pursuant to the South Dakota Rules of Civil Procedure, demands answer, under oath, to the following written Interrogatories and Request for Production of Documents within thirty (30) days of the service upon you of said Interrogatories and Request.

These Interrogatories and Request for Production of Documents shall be deemed to be continuing and if information is discovered by or becomes known to you or the Applicant, or to anyone acting on Applicant's behalf after answering the same, and before the scheduled September 23, 2013, start of the Hearing in the matter, which should change or add to the answers given, you are hereby directed and requested to furnish said information to the undersigned under oath, giving timely notice thereof.

DEFINITIONS:

(a) "You" or "your" means yourself or the Applicant, predecessors in interest, if any, and all other persons acting or purporting to act on behalf of the Applicant.

(b) As used herein, the term "document" shall mean the original and any copy, regardless of origin or location, of any book, pamphlet, periodical, letter, memorandum, telegram, report, record, study, written notice, working paper, chart, paper, index, tape, data sheet, data processing card, or any other written, recorded, transcribed, punched, audio or video taped, filmed or graphic material, however produced or reproduced, to which you have or have had access.

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(c) The term "identify" or "identification," when used with reference to an individual person, shall mean to state his or her full name, present position, business affiliation, if known, address, and prior position or affiliation, if no longer connected with the Applicant or beneficiaries in interest. The terms "identify" or "identification," when used with reference to a document, shall mean to state the date and author or signor, as the case may be, the addressee, the type of document, its present or last known location or custodian and all means of identifying it with sufficient particularity to satisfy the requirements for its inclusion in a motion for its production pursuant to the SD Rules of Civil Procedure. If any such document was, but is no longer in your possession or subject to your control, state the disposition which was made of it and the reason for such disposition and the date thereof.

1. Please identify the person or persons providing each answer to an Interrogatory or portion thereof, giving the full name, address of present residence, date of birth, business address and occupation.

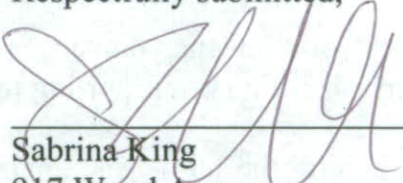
2. Prior to answering these interrogatories, have you made due and diligent search of all books, records, and papers of the Applicant with the view of eliciting all information available in this action?

3. INTERROGATORY 1: What is the estimated total cost of reclamation for the entire Dewey-Burdock Project based on 2013 costs?

- Provide a copy of any and all documentation which supports or reflects the substance of each answers to the questions posed above.

Dated this 3 day of July, 2013.

Respectfully submitted,



Sabrina King
917 Wood Ave
Rapid City, SD 57701

Intervenor

CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the above Interrogatories and Requests for Production of Documents was mailed, U.S. postage paid to:

ALL FULL A INTERVENORS LISTED IN "OPTION A SERVICE LIST" BY THE
DENR AS OF JULY 1, 2013

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STATE OF SOUTH DAKOTA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
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**SABRINA KING'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS TO**

**South Dakota Department of Environment
and Natural Resources**

TO: The South Dakota Department of Environment and Natural Resources (DENR)

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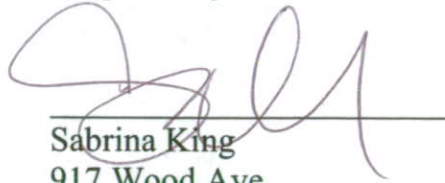
3. INTERROGATORY 1: Over the life of the project, from the initial contact with Powertech (USA), Inc. through reclamation and mine closing, how much money will the Dewey-Burdock Project cost the DENR?

Costs should include, but not be limited to: mining permit review; legal fees; direct hearing costs, including room rental, expenses, etc.; cost of all reviews of various project aspects; DENR staff time spent advising Powertech (USA), Inc.; DENR staff time spent speaking with constituents, intervenors, and other interested parties; travel, lodging, and per diem for DENR staff and board members relating to all pre-hearings and hearings; all costs related to staff monitoring of the mine construction, operation, closure, and reclamation, including travel, per diem, salary, and other related expenses; and any other direct and indirect costs related to the proposed project.

- Provide a copy of any and all documentation which supports or reflects the substance of each answers to the questions posed above.

Dated this 3 day of July, 2013.

Respectfully submitted,

A handwritten signature in purple ink, appearing to be 'SK', is written over a horizontal line.

Sabrina King
917 Wood Ave
Rapid City, SD 57701

Intervenor

CERTIFICATE OF SERVICE

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ALL FULL A INTERVENORS LISTED IN "OPTION A SERVICE LIST" BY THE
DENR AS OF JULY 1, 2013

Sabrina King
917 Wood Ave
Rapid City, SD 5771



MIKE CEPAK
MINERALS AND MINING PROGRAM
FOSS BUILDING
523 EAST CAPITOL AVENUE
PIERRE SD 57501

5750133182 C012

