

**FORM 10**  
[RULE 3.25]

COURT FILE NO.

COURT

COURT OF KING'S BENCH OF  
ALBERTA

JUDICIAL CENTRE

CALGARY



PLAINTIFFS

NORTHBACK HOLDINGS CORPORATION

DEFENDANTS

HIS MAJESTY THE KING IN RIGHT OF THE PROVINCE OF  
ALBERTA and HIS MAJESTY THE KING IN RIGHT OF THE  
PROVINCE OF ALBERTA as represented by the MINISTER OF  
ENERGY AND MINERALS

DOCUMENT

**STATEMENT OF CLAIM**

ADDRESS FOR  
SERVICE AND  
CONTACT  
INFORMATION OF  
PARTY FILING  
THIS DOCUMENT

**BENNETT JONES LLP**

Barristers and Solicitors  
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855 – 2<sup>nd</sup> Street SW  
Calgary, Alberta T2P 4K7

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Client File No.: 094559.6

**NOTICE TO DEFENDANTS:**

You are being sued. You are a defendant.

Go to the end of this document to see what you can do and when you must do it.

**Statement of facts relied on:**

1. Northback Holdings Corporation ("**Northback**") brings this claim for damages against His Majesty the King in Right of Alberta ("**Alberta**") and against His Majesty the King in Right of Alberta as represented by the Minister of Energy and Minerals ("**Minister of Energy**") to recover damages arising from the constructive taking, also known as *de facto* expropriation, of Northback's freehold mineral rights and coal leases arising from the Indefinite Moratorium, as further defined and described below, as well as other government actions. Northback also brings claims for damages pursuant to the doctrines of private nuisance and unjust enrichment.

**The Parties**

2. Northback is a corporation duly incorporated under the laws of British Columbia and extra-provincially registered in the Province of Alberta, with offices in Blairmore and Calgary, Alberta. Northback is a mining company focused on developing metallurgical (steelmaking) coal projects.
3. The Defendant, the Minister of Energy and Minerals ("**Minister of Energy**"), is a cabinet minister responsible for, among other things, managing and developing policy for the province's mineral resources and granting industry the rights to explore for and develop mineral resources. The Defendant, Minister of Energy, is responsible for administering the *Mines and Minerals Act*, RSA 2000, c M-17 and the *Responsible Energy Development Act*, SA 2012, c R-17.3.

**Background**

4. The Crowsnest Pass region, located in the southwest of the Province of Alberta and the eastern slopes of the Rocky Mountains (the "**Eastern Slopes**"), is known for its long history of coal mining.
5. In or around 2013, Northback acquired mineral interests in Alberta's Crowsnest Pass region and Eastern Slopes with the intention of developing long-term metallurgical coal mining operations in the region. On or about August 29, 2013, pursuant to a transaction with Devon Canada and CONSOL of Canada, Northback acquired assets:

- (a) in or around the community of Frank ("**Bellevue**");
  - (b) south and east of the town of Blairmore ("**Adanac**");
  - (c) south and west of the town of Blairmore ("**Lynx Creek**"); and
  - (d) seven kilometers north of the town of Blairmore ("**Blairmore**").
- (collectively, the "**Northback Properties**").

6. As part of the transaction, Northback acquired freehold mineral rights in fee simple, freehold leased mineral interests, and Crown leased mineral interests for the Northback Properties (collectively, the "**Freehold Mineral Rights and Crown Leases**"). A schedule of these Freehold Mineral Rights and Crown Leases is attached as **Schedule "A"**.
7. Northback intended to construct and operate an open-pit metallurgical coal mine on the Blairmore property (the "**Grassy Mountain Project**"). Northback also intended to explore and develop its Freehold Mineral Rights and Crown Leases in the Adanac, Lynx Creek, and Bellevue properties.

### **The 1976 Coal Policy**

8. On June 15, 1976, *A Coal Development Policy for Alberta* (the "**1976 Coal Policy**") became effective. Pursuant to the 1976 Coal Policy, no development was permitted unless Alberta was satisfied that it would proceed without causing irreparable harm to the environment. The 1976 Coal Policy did not have force of law, nor did it create legally binding restrictions. Rather, its purpose was to encourage and describe Alberta's policy on coal exploration and development.
9. The 1976 Coal Policy classified lands in Alberta into categories 1 through 4 (the "**Land Categories**") with a distinct level of restriction on coal exploration and development applying to each category as a matter of government policy. The 1976 Coal Policy established the following land categories under Article 3.13:

- (a) **Category 1:** No exploration or commercial development permitted for various National Parks, present or proposed Provincial Parks, Wilderness Areas, Natural Areas, Restricted Development Study Areas, Watershed Research Study Basins, Designated Recreation Areas, Designated Heritage Site, Wildlife Sanctuaries, settled urban areas and major lakes and rivers.
  - (b) **Category 2:** Limited exploration may be permitted under strict control, but in which commercial development by surface mining will not normally be considered. This category contains lands for which the preferred land or resource use remains to be determined, or areas where infrastructure facilities are generally absent or considered inadequate to support major mining operations.
  - (c) **Category 3:** Exploration may be permitted under appropriate control but in which development by surface and underground mining or in-situ operations will be approved subject to proper assurance respecting protection of the environment and reclamation of disturbed lands and as the provision of needed infrastructure is determined to be in the public interest.
  - (d) **Category 4:** Exploration may be permitted under appropriate control and in which surface or underground mining or in-situ operations may be considered subject to proper assurances respecting protection of the environment and reclamation of disturbed lands. This category covers the parts not included in categories 1-3.
10. Most of the Northback Properties are located on category 4 lands. At the time that Northback acquired those lands, the 1976 Coal Policy did not impose any restrictions on commercial development of category 4 lands and confirmed that applications for the right to explore, lease, or develop coal on category 4 lands were to be considered under normal approval procedures.

### **Alberta Rescinds the 1976 Coal Policy**

11. On May 15, 2020, Alberta publicly announced that it rescinded the 1976 Coal Policy effective on June 1, 2020. Alberta specified that development on lands that include the Northback Properties would be subject to normal regulatory processes.

12. The rescission of the 1976 Coal Policy removed all policy-based restrictions on issuing coal leases within category 2 and 3 lands. At the time, Alberta explained that it would continue to restrict coal leasing, exploration, and development within category 1 lands. Alberta further advised that the Land Categories were no longer required to effectively manage Crown coal leases or the location or exploration and development activities, citing decades of improved policy, planning, and regulatory processes to support the removal of the Coal Policy and Land Categories.

### **Alberta Changes its Position by Reinstating the 1976 Coal Policy**

13. On February 8, 2021, Alberta changed its position and reinstated the 1976 Coal Policy in its entirety, including the Land Categories. In conjunction with the reinstatement of the 1976 Coal Policy, the Minister of Energy issued Ministerial Order 054/2021 which included the "Coal Policy Direction".
14. Through the Coal Policy Direction, the Minister of Energy directed the Alberta Energy Regulator (the "AER") to consider the Land Categories set out in the 1976 Coal Policy when considering an application for approval for exploration for, or development of, coal under energy resources enactments. Further, Ministerial Order 054/2021 and the Coal Policy Direction imposed, *inter alia*, an immediate ban on mountain-top mining on category 2 lands and placed a moratorium on any new development on category 2 lands.

### **Alberta Establishes the Coal Policy Committee**

15. On February 23, 2021, the Minister of Energy announced forthcoming public consultations with Albertans on a modern coal policy.
16. Subsequently, on March 29, 2021, the Terms of Reference for the Coal Policy Committee were introduced. The Coal Policy Committee's mandate was to conduct public engagement and prepare a report for the Minister of Energy that addressed the management of coal resources and provided recommendations to clarify the nature, scope, and intent of the restrictions under the 1976 Coal Policy.

17. On December 29, 2021, the Minister of Energy announced that Alberta had received the Coal Policy Committee's report. However, at the time, the report was not released publicly.

### **Alberta Imposes an Indefinite Moratorium on Coal Development**

18. On March 2, 2022, the Minister of Energy issued Ministerial Order 002/2022, which included the "Coal Development Direction". The Coal Development Direction directed the AER to continue the pause on coal exploration and development activities on category 2 lands and expanded this pause to coal exploration so that it applied on category 3 and 4 lands. Additionally, pursuant to the Coal Development Direction, Alberta would no longer accept any new coal lease applications in category 2, 3, and 4 lands and lease applications for category 1 lands would remain denied. In other words, Alberta announced a new, indefinite moratorium on coal exploration and development on lands such as those on which the Northback Properties are located (the "**Indefinite Moratorium**").
19. On March 4, 2022, Alberta announced and confirmed the Indefinite Moratorium and stated that, *inter alia*, effective immediately, it was extending, both temporally and spatially, restrictions on coal exploration and development by suspending all coal-related exploration and development activity in the Eastern Slopes. As a result, Northback is prevented from advancing any coal exploration or development at the Northback Properties and cannot exploit its Freehold Mineral Rights and Crown Leases.
20. On March 8, 2022, Alberta provided policy guidance on coal tenure, advising that Alberta would not accept any new coal lease applications in category 2 and 4 lands. Existing coal leases would remain in place and lessees would be required to continue paying annual rentals.

**De facto Expropriation of Northback's Freehold Mineral Rights and Crown Leases**

21. Due to the establishment of the Indefinite Moratorium, Northback's Freehold Mineral Rights and Crown Leases have been *de facto* expropriated and Northback cannot proceed with the development of the Northback Properties. Alberta has effectively eliminated all reasonable uses of the Northback Properties for the purposes of further developing a metallurgical coal project or otherwise.
22. The Indefinite Moratorium compounded the impacts to Northback arising from Alberta's establishment of the Castle Provincial Park on or around January 20, 2017. In particular, Alberta has removed all reasonable uses for Northback's Freehold Mineral Rights and Crown Leases located in the Lynx Creek and Adanac properties, which are located within, adjacent to, or outside of the Castle Provincial Park.
23. Through the issuance of the Coal Policy Direction and the Coal Development Direction (the "**Ministerial Directions**") and the imposition of the Indefinite Moratorium, Alberta has:
  - (a) acquired a beneficial interest in or flowing from the Northback Properties; and
  - (b) removed all reasonable uses of the Northback Properties by denying Northback the opportunity to continue the development of its Freehold Mineral Rights and Crown Leases.
24. Alberta is liable to Northback for the *de facto* expropriation or constructive taking of Northback's Freehold Mineral Rights and Crown Leases in the Northback Properties. By issuing the Ministerial Directions and imposing the Indefinite Moratorium on all coal exploration and development activity on the Northback Properties, Alberta has precluded the commercial development of the Northback Properties or any reasonable use of these properties. Alberta is liable to compensate Northback for its constructive taking of the Northback Properties. In the alternative, Alberta is liable to Northback for unjust enrichment and private nuisance.

25. Notwithstanding Alberta's immediate, indefinite, and complete ban on coal exploration and development, Alberta has neither compensated nor offered to compensate Northback.
26. Northback is entitled to compensation for the loss of value of the Northback Properties as a result of Alberta's *de facto* expropriation or constructive taking, or such other amount of damages or compensation as the Court deems just and appropriate in the circumstances.
27. Further, or in the alternative, Northback is entitled to compensation for the costs that it incurred to explore and develop the Northback Properties.

### **Unjust Enrichment**

28. In the alternative, Alberta has been unjustly enriched by receiving the benefit of, among other things, lease rental payments and environmental monitoring and maintenance activities on the Northback Properties.
29. The benefits that Alberta received were premised on Northback's continued ability to develop the Northback Properties. The Ministerial Directions and Indefinite Moratorium have removed any ability for Northback to develop the Northback Properties. Consequently, Northback has suffered a corresponding deprivation. There is no juristic reason for Alberta's prior or continued enrichment in retaining these benefits.

### **Private Nuisance**

30. Further, or in the alternative, Alberta's Ministerial Directions and the Indefinite Moratorium constitute a substantial and unreasonable interference with Northback's use, enjoyment of, access to, and exercise of their proprietary rights by preventing it from exploring and developing the Northback Properties.
31. This interference is not trivial because it renders Northback completely incapable of exploiting the Freehold Mineral Rights and Crown Leases and the Northback Properties. Alberta's substantial and unreasonable interference with Northback's proprietary rights in the Freehold Mineral Rights and Crown Leases, and Northback Properties, has caused Northback to suffer and continue to suffer significant harm for which Alberta is liable.



**Damages Suffered by the Plaintiff**

32. The actions of Alberta and the Minister of Energy have deprived Northback of: (i) the value of the Northback Properties; (ii) the right to access and exploit its Freehold Mineral Rights and Crown Leases; and (iii) the benefit of all costs and expenses incurred to date in relation to the exploration and development of the Northback Properties.
33. As a result of Alberta's conduct as described above, Northback has suffered, and continues to suffer, losses and damages, estimated to be in excess of \$7 billion including:
- (a) loss of net present value of the Northback Properties and Freehold Mineral Rights and Crown Leases, including the Grassy Mountain Project, in the amount of \$7 billion or such other amount as may be proven at trial;
  - (b) the costs incurred to acquire, explore and develop the Northback Properties and Freehold Mineral Rights and Crown Leases, including the Grassy Mountain Project;
  - (c) the costs of lease rental payments made to Alberta subsequent to the removal of Northback's ability to explore and develop the Northback Properties and Freehold Mineral Rights and Crown Leases, including the Grassy Mountain Project;
  - (d) losses due to the delay in Northback's ability to develop the Northback Properties and Freehold Mineral Rights and Crown Leases, including the Grassy Mountain Project; and
  - (e) such further and other amounts to be proved at the trial of this action.

**Place of Trial**

34. Northback proposes that the trial of this action be held at the Calgary Courts Centre in the City of Calgary in the Province of Alberta.

**Remedy sought**

35. Northback seeks the following remedy:

- (a) damages in the amount of \$7 billion or such other amount to be proved at trial;
- (b) interest pursuant to the *Judgment Interest Act*, RSA 2000, c J-1, as amended;
- (c) costs of this claim; and
- (d) such further and other relief as this Honourable Court deems just.

**NOTICE TO THE DEFENDANTS**

You only have a short time to do something to defend yourself against this claim:

20 days if you are served in Alberta

1 month if you are served outside Alberta but in Canada

2 months if you are served outside Canada.

You can respond by filing a statement of defence or a demand for notice in the office of the clerk of the Court of King's Bench at Calgary, Alberta, AND serving your statement of defence or a demand for notice on the plaintiffs' address for service.

**WARNING**

If you do not file and serve a statement of defence or a demand for notice within your time period, you risk losing the lawsuit automatically. If you do not file, or do not serve, or are late in doing either of these things, a court may give a judgment to the plaintiffs against you.

**Schedule "A"**

Freehold Mineral Rights in Fee Simple

Parcel 1: TOWNSHIP 7 RANGE 3 W5M SECTION 29 LSD 1, 2, 7, 8

Parcel 2: TOWNSHIP 7 RANGE 3 W5M SECTION 31 LSD 1, 2, 7, 8

Parcel 3: TOWNSHIP 7 RANGE 3 W5M SECTION 20 LSD 9, 10, 15, 16

Parcel 4: TOWNSHIP 7 RANGE 3 W5M SECTION 6 LSD 1, 2, 7, 8

Parcel 5: TOWNSHIP 6 RANGE 3 W5M SECTION 32 LSD 3, 4, 5, 6, 11, 12, 13, 14

Parcel 6: TOWNSHIP 6 RANGE 3 W5M SECTION 31 LSD 1, 2, 7, 8

Parcel 7: TOWNSHIP 6 RANGE 3 W5M SECTION 31 LSD 3, 4, 5, 6, 9, 10, 11, 12, 13,  
14, 15, 16

Parcel 8: TOWNSHIP 6 RANGE 3 W5M SECTION 30 LSD 2, 7

Parcel 9: TOWNSHIP 6 RANGE 3 W5M SECTION 30 LSD 11, 12, 13, 14

Parcel 10: TOWNSHIP 6 RANGE 3 W5M SECTION 30 LSD 1, 2, 7, 8, 9, 10, 15, 16

Parcel 11: TOWNSHIP 6 RANGE 3 W5M SECTION 20

Parcel 12: TOWNSHIP 6 RANGE 3 W5M SECTION 19 LSD 9, 10, 15, 16

Parcel 13: TOWNSHIP 6 RANGE 3 W5M SECTION 17 LSD 1, 2, 3, 4, 5, 6, 7, 8, 11, 12,  
13, 14

Parcel 14: TOWNSHIP 6 RANGE 3 W5M SECTION 17 LSD 9, 10, 15, 16

Parcel 15: TOWNSHIP 7 RANGE 4 W5M SECTION 36 LSD 1, 2, 7, 8, 9, 10, 15, 16

Parcel 16: TOWNSHIP 7 RANGE 4 W5M SECTION 25 LSD 9, 10, 15, 16

Parcel 17: TOWNSHIP 7 RANGE 3 W5M SECTION 32

Parcel 18: TOWNSHIP 7 RANGE 3 W5M SECTION 30

Parcel 19: TOWNSHIP 7 RANGE 3 W5M SECTION 29 LSD 1, 2, 3, 4, 5, 6, 7, 8, 11, 12,  
13, 14

Parcel 20: TOWNSHIP 7 RANGE 3 W5M SECTION 26 LSD 3, 4, 5, 6, 11, 12, 13, 14

Parcel 21: TOWNSHIP 7 RANGE 3 W5M SECTION 23 LSD 9, 10, 15, 16

- Parcel 22: TOWNSHIP 7 RANGE 3 W5M SECTION 23 LSD 11, 12, 13, 14
- Parcel 23: TOWNSHIP 7 RANGE 3 W5M SECTION 23 LSD 1, 2, 7, 8
- Parcel 24: TOWNSHIP 7 RANGE 3 W5M SECTION 22 LSD 1, 2, 7, 8, 9, 10, 15, 16
- Parcel 25: TOWNSHIP 7 RANGE 3 W5M SECTION 12 LSD 3, 4, 5, 6, 11, 12, 13, 14
- Parcel 26: TOWNSHIP 7 RANGE 3 W5M SECTION 20 LSD 1, 2, 7, 8
- Parcel 27: TOWNSHIP 7 RANGE 3 W5M SECTION 17 LSD 11, 12, 13, 14
- Parcel 28: TOWNSHIP 7 RANGE 3 W5M SECTION 15 LSD 3, 4, 5, 6
- Parcel 29: TOWNSHIP 7 RANGE 2 W5M SECTION 6 LSD 3, 4, 5
- Parcel 30: TOWNSHIP 6 RANGE 2 W5M SECTION 31 LSD 1, 2, 7, 8, 9, 10, 15, 16
- Parcel 31: TOWNSHIP 6 RANGE 2 W5M SECTION 30, LSD 16
- Parcel 32: TOWNSHIP 7 RANGE 4 W5M SECTION 35 LSD 3, 4, 5, 6, 11, 12, 13, 14
- Parcel 33: TOWNSHIP 7 RANGE 4 W5M SECTION 35 LSD 1, 2, 7, 8
- Parcel 34: TOWNSHIP 7 RANGE 4 W5M SECTION 35 LSD 9, 10, 15, 16
- Parcel 35: TOWNSHIP 7 RANGE 4 W5M SECTION 26
- Parcel 36: TOWNSHIP 7 RANGE 4 W5M SECTION 23
- Parcel 37: TOWNSHIP 6 RANGE 4 W5M SECTION 13 LSD 1, 2, 7, 8, 9, 10, 15, 16
- Parcel 38: TOWNSHIP 6 RANGE 4 W5M SECTION 18 LSD 4
- Parcel 39: TOWNSHIP 6 RANGE 3 W5M SECTION 7 LSD 3, 4, 5, 6, 11, 12, 13, 14
- Parcel 40: TOWNSHIP 6 RANGE 4 W5M SECTION 34 LSD 3, 4, 5, 6, 11, 12, 13, 14
- Parcel 41: TOWNSHIP 6 RANGE 4 W5M SECTION 33
- Parcel 42: TOWNSHIP 6 RANGE 4 W5M SECTION 28 LSD 1, 2, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16
- Parcel 43: TOWNSHIP 6 RANGE 4 W5M SECTION 22
- Parcel 44: TOWNSHIP 6 RANGE 4 W5M SECTION 21 LSD 9, 10, 15, 16
- Parcel 45: TOWNSHIP 6 RANGE 4 W5M SECTION 27 LSD 3, 4, 5, 6, 11, 12, 13, 14
- Parcel 46: TOWNSHIP 6 RANGE 4 W5M SECTION 15

Parcel 47: TOWNSHIP 7 RANGE 4 W5M SECTION 19 LSD 3, 4, 5, 6, 11, 12, 13, 14

Parcel 48: TOWNSHIP 6 RANGE 4 W5M SECTION 2 LSD 3, 4, 5, 6, 11, 12, 13, 14

Parcel 49: TOWNSHIP 6 RANGE 4 W5M SECTION 10 LSD 1, 2, 7, 8, 9, 10, 15, 16

Parcel 50: TOWNSHIP 8 RANGE 4 W5M SECTION 1 LSD 1

Parcel 51: TOWNSHIP 8 RANGE 3 W5M SECTION 31 LSD 1, 2, 3, 4, 5, 6, 7, 8, 11, 12, 13, 14

Parcel 52: TOWNSHIP 8 RANGE 3 W5M SECTION 30

Parcel 53: TOWNSHIP 8 RANGE 3 W5M SECTION 19

Parcel 54: TOWNSHIP 8 RANGE 3 W5M SECTION 18

Parcel 55: TOWNSHIP 8 RANGE 3 W5M SECTION 17 LSD 3, 4, 5, 6, 11, 12, 13, 14

Parcel 56: TOWNSHIP 8 RANGE 3 W5M SECTION 8 LSD 11, 12, 13, 14

Parcel 57: TOWNSHIP 8 RANGE 3 W5M SECTION 7 LSD 1, 2, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16

Parcel 58: TOWNSHIP 8 RANGE 3 W5M SECTION 5 LSD 11, 12, 13, 14

Parcel 59: TOWNSHIP 8 RANGE 3 W5M SECTION 5 LSD 3, 4, 5, 6

Parcel 60: TOWNSHIP 7 RANGE 3 W5M SECTION 31 LSD 3, 4, 5, 6, 11, 12, 13, 14

Parcel 61: TOWNSHIP 8 RANGE 3 W5M SECTION 36

Parcel 62: TOWNSHIP 8 RANGE 3 W5M SECTION 25

Parcel 63: TOWNSHIP 8 RANGE 4 W5M SECTION 24 LSD 9, 10, 11, 12, 13, 14, 15, 16

Parcel 64: TOWNSHIP 8 RANGE 4 W5M SECTION 15 LSD 1, 2, 7, 8

Parcel 65: TOWNSHIP 8 RANGE 4 W5M SECTION 14

Parcel 66: TOWNSHIP 8 RANGE 4 W5M SECTION 10 LSD 1, 2, 7, 8, 9, 10, 15, 16

Parcel 67: TOWNSHIP 8 RANGE 4 W5M SECTION 3 LSD 1, 2, 7, 8, 9, 10, 15, 16

Parcel 68: TOWNSHIP 8 RANGE 4 W5M SECTION 2

Parcel 69: TOWNSHIP 7 RANGE 3 W5M SECTION 27 LSD 1, 2, 7, 8, 9, 10, 15, 16

Crown Leased Mineral Interests

Lease No. 1399010001 (renewed as 1314010344)

Lease No. 1399010002 (renewed as 1314010343)

Lease No. 1399010003 (renewed as 1314010355)

Lease No. 1304020413 (renewed as 1319020113)

Lease No. 1307030946 (renewed as 1322030175)

Lease No. 1399030002 (renewed as 1314030412)

Lease No. 1307030961 (renewed as 1322030179)

Lease No. 1307030962 (renewed as 1322030180)

Lease No. 1307030963 (renewed as 1322030181)

Lease No. 1307030964 (renewed as 1322030182)

Lease No. 1307030965 (renewed as 1322030183)

Lease No. 1302040120 (renewed as 1317040274)

Lease No. 1308050906 (renewed as 1323050170)

Lease No. 1308050907 (renewed as 1323050171)

Lease No. 1308050908 (renewed as 1323050172)

Lease No. 1308050909 (renewed as 1323050173)

Lease No. 1309050314

Lease No. 1312060346

Lease No. 1311060937

Lease No. 1308070802 (renewed as 1323070191)

Lease No. 1307080678 (renewed as 1322080196)

Lease No. 1309090457

Lease No. 1309110258

Lease No. 1306120436 (renewed as 1321120135)

Lease No. 1306120437 (renewed as 1321120136)

Lease No. 1301120013 (renewed as 1316120176)

Lease No. 1307030958 (renewed as 1322030176)

Lease No. 1307030959 (renewed as 1322030177)

Lease No. 1307030960 (renewed as 1322030178)

Lease No. 1301090001 (renewed as 1316090233)

Lease No. 1302050146 (renewed as 1317050291)