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LATIN AMERICA MINERAL AND ENERGY LAW Newsletter

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In this issue

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Jimena Vega Olmos, Reporter

Amendment to Rules Governing the Natural Gas Transportation System

Through Resolution SE No. 66/2026 (Mar. 13, 2026), the Secretariat of Energy significantly amended the rules governing natural gas transportation as part of the energy sector normalization process.

The new rules reorganize natural gas transportation capacity in response to changes in gas flows and operating conditions resulting from the development of Vaca Muerta, declining production in the north and certain areas of the Austral Basin, reduced gas supplies from Bolivia, and the need to implement Resolution SE 400/2025 relating to normalization of the electricity market.

The Resolution approves a broad reconfiguration of the natural gas transportation system, including a new allocation of volumes among gas distributors, transportation contracts, transportation licensees, and guidelines for allocating incremental capacity. This reconfiguration will require the issuance of additional regulations by the natural gas regulator, ENARGAS.

The Resolution also eliminates the "Transport.Ar National Production" Gas Pipeline System Program approved in 2022, which provided for the construction of certain priority gas transportation expansions.

In addition, the Resolution instructs ENARSA and CAMMESA to terminate the firm transportation contract for the Perito Moreno Gas Pipeline (GPM), along with other

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Gonzalo Dávila, Reporter

Removal of Fuel Subsidies: A Structural Measure to Address Fuel Shortages in Bolivia

A Brief Reminder Regarding the Regulations Issued in 2024

Our report published in Vol. 3, No. 2 (2025) of this *Newsletter*, titled "Regulation of Fuel Imports for Commercialization by Private Entities as a Measure to Address the Economic Crisis and Fuel Shortages," reported on the approval and publication by the Bolivian Government of Supreme Decree No. 5218 of September 4, 2024, which introduced measures to streamline fuel import procedures for self-consumption under the authorization and supervision of the hydrocarbons regulator, the National Hydrocarbons Agency (ANH), and Supreme Decree No. 5271 of November 13, 2024, which established the conditions for the private sector to import and commercialize fuel to meet domestic demand. Since such fuel is not produced within Bolivian territory, its importation for commercialization by private parties may be regulated on an exceptional basis, thereby offering an alternative for sectors that require non-subsidized prices. These measures reflected a policy of openness and relief for fuel supply in the domestic market in order to address the economic crisis that intensified in Bolivia in 2024, resulting in shortages of both dollars and fuels (diesel oil and gasoline), increases in the prices of basic household goods, and long lines of vehicles at service stations.

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contracts to which ENARSA may be a party that prevent efficient use of GPM capacity, effective upon the entry into force of the transportation system reconfiguration.

The Resolution further instructs the Undersecretariat of Hydrocarbons to promote repeal of Decree No. 689/2002, which exempted export natural gas transportation tariffs and export transportation contracts originally agreed in foreign currency from mandatory "pesification."

Finally, the Resolution instructs the Undersecretariat of Hydrocarbons to revise the remuneration guidelines established in Decree No. 1060/2024. Under that decree, the Government declared Transportadora de Gas del Sur's private initiative to expand the GPM pipeline to be in the public interest and established a unified shipper price equal to the average of the existing price for currently contracted capacity under the ENARSA-CAMMESA transportation contract and the new price for incremental capacity awarded through the expansion tender.

AlmaSADI: Tender for Electricity Supply Through Storage Facilities for Reserve and Reliability in the Wholesale Electricity Market

Pursuant to Resolution SE No. 50/2026 (Mar. 2, 2026), the Federal Secretariat of Energy launched the AlmaSADI tender for the supply of electricity through storage facilities for reserve and reliability purposes. The tender seeks to award power storage agreements with CAMMESA for up to 700 MW of target capacity, aimed at incorporating energy storage at certain nodes of the grid.

Bids must include the supply of energy and availability of committed capacity for at least four consecutive hours through new battery energy storage systems (BESS).

The storage agreements may have terms of up to 15 years. Each bid must be supported by a bid bond equal to US$10,000 per MW of maximum offered capacity.

Although no minimum permits are required at the time of bid submission, the necessary permits must be obtained within specified deadlines. In addition, awardees will be required to make certain payments to maintain the award, a portion of which may be reimbursed if the projects achieve commercial operation by specified deadlines.

Bids may be submitted through May 8, 2026, and the award of the agreements is scheduled for June 19, 2026.

Decree No. 105/2026: Amendments to RIGI's Implementing Regulations

Through Decree No. 105/2026, published in the Official Gazette on February 19, 2026, the Government amended Decree No. 749/2024, which implements the provisions of Law No. 27,742 governing the Incentive Regime for Large Investments (RIGI).

Among other changes, the Decree extended the deadline for submitting RIGI applications by one year from July 8, 2026.

Decree No. 105 also expanded the scope of the eligible oil and gas subsectors to include new onshore hydrocarbon exploration and production projects developed in areas that, as of the effective date of Law No. 27,742, did not have a significant level of development and that, as of the date of the RIGI application, had not received investments in exploitation or production activities. Where RIGI and non-RIGI activities coexist within the same area, segregation and traceability must be ensured through separate measurement systems.

In addition, Decree No. 105 modified the minimum investment requirements applicable to certain oil and gas subsectors as follows:

(1) Offshore exploration and production projects: the minimum investment requirement was reduced from US$600 million to US$200 million; and

(2) New onshore hydrocarbon production projects: the minimum investment requirement was set at US$600 million.

The Decree also introduced amendments relating to investments in the technology sector, import duty exemptions, the tax amortization mechanism, RIGI suppliers, and other related matters.

LATIN AMERICA MINERAL AND ENERGY LAW NEWSLETTER

Editor

Miguel Baeza
International Program Fellow
The Foundation for Natural Resources and Energy Law

Reporters

ARGENTINA
Jimena Vega Olmos
Estudio Beccar Varela
Buenos Aires

Inés Agüero Ovejero
Rio Tinto
Salta

BOLIVIA
Mattías Garrón
PPO Legal & Tax
La Paz

Gonzalo Dávila Maceda
Oficina de Asesoramiento Legal
La Paz

BRAZIL
Marina Diniz Cândido de Araújo
Anglo American
Belo Horizonte

Tiago de Mattos
William Freire Advogados Associados
São Paulo

CHILE
Joaquín Corvalán Azpiazu
Bascuñán & Cía
Santiago

Alejandro Montt R.
Montt Pérez-Cotapos Abogados
Santiago

COLOMBIA
Tomás de la Calle
TdlC Energy Consulting & Training
Bogota

Janine Acosta
Cemex
Bogota

ECUADOR
Rafael Valdivieso E. &
Analía Andrade
Bustamante Fabara Abogados
Quito

MEXICO
Rodrigo Sánchez Mejorada Raab
Sanchez-Mejorada, Velasco y Ribé, S.C.
Mexico City

Jorge Rodríguez Moreno
Lammoglia Abogados
Mexico City

PERU
Oscar Benavides
Rodrigo, Elias & Medrano Abogados
Lima

Luis Felipe Huertas del Pino
Hernández & Cía Abogados
Lima

URUGUAY
Agustina Pérez Lete
Ferrere Abogados
Montevideo

VENEZUELA
Isabella Sordo Huizi &
Santiago Fontiveros Santander
Sucre Energy Group
Caracas

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Incentive Program for Conventional Production of the Province of Río Negro

Decree No. 136/2026 of the Province of Río Negro (Feb. 26, 2026) approved the Provincial Program of Incentives for Conventional Production, aimed at encouraging increased investment in conventional hydrocarbon production within the province.

The Program establishes 10-year benefits for incremental conventional hydrocarbon production, including: (1) a reduction of the royalty rate applicable to incremental production to 6%; and (2) an exemption from the 3% provincial production contribution applicable to certain concessions with respect to incremental production.

To participate in the Program, applicants must submit to the Undersecretariat of Hydrocarbons a supplemental investment plan for each concession, projected incremental production figures, and a certification issued by licensed external auditors identifying the concession's monthly baseline production. The enforcement authority will review the submitted information and, if appropriate, notify the applicant of its approval. Once approval is granted, incremental production will be defined as the monthly volumes of hydrocarbons actually produced above the reported monthly baseline production.

Special Export Duty Scheme for Conventional Crude Oil

Decree No. 59/2026 (Jan. 29, 2026) established a new export duty scheme applicable to crude oil produced from conventional fields.

The Decree establishes the following benchmark values for calculating the applicable export duty rate: (1) a base value of US$65/bbl; and (2) a reference value of US$80/bbl, based on the international price of ICE Brent First Line.

Under the new scheme, if the international price is equal to or below the base value, the applicable export duty rate will be 0%. If the international price is equal to or above the reference value, the applicable rate will be 8%. Where the international price falls between the base value and the reference value, the applicable rate will be determined pursuant to a formula established by the Decree.

The measure is intended to support provincial governments and producing companies in continuing the development of conventional hydrocarbon production despite the natural maturity of the fields, rising operating costs, and prevailing international macroeconomic conditions.

Extension of Energy Emergency; Tender for the Purchase of LNG Supply; Transitional Gas Price for the Domestic Market

Decree No. 49/2026 (Jan. 27, 2026) extended the national energy sector emergency through December 31, 2027, with respect to natural gas transportation and distribution and approved a transitional regime governing the domestic sale price of liquefied natural gas (LNG).

The Decree provides that the price of natural gas resulting from the regasification of imported LNG used to meet demand during the next two winter periods may not exceed: (1) an international reference price established by the Secretariat of Energy; plus (2) an additional amount, expressed in US$/BTU, intended to cover maritime freight, regasification, storage, marketing, and transportation costs associated with delivering regasified LNG to Los Cardales, Province of Buenos Aires (the "Additional Amount"). The Additional Amount is to be determined through a competitive tender process for LNG imports utilizing ENARSA's regasification capacity.

The establishment of a maximum price for re-gasified gas sold in the domestic market during the transitional period is intended to avoid monopolistic conditions arising from the infrastructure and operational complexities of LNG importation and regasification, under which a single awardee would control LNG importation, infrastructure operations, and commercialization of the re-gasified gas.

The public tender was announced through Resolution SE No. 33/2026 (Feb. 9, 2026). ENARSA's infrastructure capacity will be allocated to the successful bidder for the April 1–September 30, 2026, winter period. The Resolution also approved guidelines to be incorporated into the tender documents, including: (1) LNG commercialization must be conducted by private entities registered as natural gas marketers; (2) the tender documents will include the form of Service and Access Contract for the Escobar Terminal; (3) if a new tender is conducted for the 2027 winter season, the successful bidder will have a right to match the best competing offer; and (4) the contract will be awarded based on the lowest proposed Additional Amount covering all costs included in the sale price to domestic purchasers.

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Thus, through the aforementioned report, we highlighted aspects related to the scope and particularities of Supreme Decree No. 5271, emphasizing the exceptional nature of the measure; its one-year duration; its intended beneficiaries—natural and legal persons in the private sector; the prohibition of subsidies for imported fuels; the quality requirements applicable to imported fuels; the need to obtain authorizations from both the hydrocarbons regulator and the Vice Ministry of Social Defense and Controlled Substances; and the practical steps required to import and commercialize gasoline and/or diesel oil.

The report concluded by noting that, although the government indicated that the measure was already being applied as of March 2025, it would be necessary to assess in the short and medium term whether the measure would truly provide relief to Bolivia's economic and fuel crisis.

<u>The Solution to the Economic and Fuel Crisis Left to the New Bolivian Government</u>

Initially, the measure implemented by the government of President Arce at the end of 2024 and the beginning of 2025 was considered an important step, as it eliminated the state subsidy for fuel imported by private entities, allowing market-based pricing. The idea was that, given the crisis and resulting necessity, private actors would use the measure, thereby relieving the State of part of the burden of fuel supply in the country. Thus, the government stated that, under Supreme Decrees No. 5218, 5271, and 5313, private companies had been authorized to import more than 29 million liters of diesel per month for

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commercialization. It also indicated that 20 companies were in the process of obtaining authorization from the ANH, while 5 companies were undergoing authorization procedures before the General Directorate of Controlled Substances (DGSC). *See* ABI, "Private Companies Are Authorized to Import and Sell More than 29 Million Liters of Diesel per Month" (Mar. 15, 2025).

However, four months later, in July 2025, public opinion shifted. Despite the government enabling free fuel imports with zero tariffs, less than 10% of applications had materialized due to obstacles, delays, and excessive state control experienced by entrepreneurs attempting to use the measure. *See* Ernesto Estremadoiro Flores, "Fuel Imports Under Lock and Key: Only 36 out of 375 Applications Were Approved," *El Deber* (July 18, 2025). The article reports that although the Executive Branch had processed 375 applications, only 36 companies were able to complete fuel import operations. It also notes that sectors such as transportation, agriculture, and exports urged the government to simplify the process, as the government continued to maintain control over authorizations, the state-owned company YPFB remained the principal importer and distributor of hydrocarbons, and fuel shortages continued to affect the national economy, particularly agriculture, manufacturing, and foreign trade.

The new Bolivian government led by President Rodrigo Paz Pereira began its mandate by heading a caravan of tanker trucks entering Bolivia with imported gasoline and diesel oil. The objective was to increase fuel supply and eliminate the long lines caused by shortages that had persisted for several months, while signaling the beginning of broader reforms intended to address the problems left by the outgoing administration. *See* "Bolivia's President Leads a Caravan of Tanker Trucks to Supply Gasoline and Diesel," *SWISSINFO* (Nov. 9, 2025).

At the same time, although the incoming President stated that "the gasoline issue is guaranteed," he did not specify how his administration planned to address fuel subsidies, which reportedly amounted to approximately US$2.9 billion annually under the 2025 General Budget, equivalent to approximately 4% of GDP. *See* Gonzalo Zegarra, "Rodrigo Paz Takes Office in Bolivia and Claims to Have Secured Fuel and Dollars. Will That Be Enough for Him to Govern?," *CNN en Español* (Nov. 8, 2025).

In its first days in office, and following preliminary analyses of the inherited situation, the new hydrocarbons authorities reportedly determined that approximately 30% of subsidized fuel was being diverted through smuggling into neighboring countries. The hydrocarbons regulator had identified "organized mafias" operating fuel diversion schemes. *See* Maria Silvia Trigo, "Bolivia: Hydrocarbons Agency Estimates That 30% of Subsidized Fuel Is Smuggled," *Infobae* (Nov. 19, 2025). Bolivia's dependence on imported fuel (95% of diesel and more than 50% of gasoline demand) combined with long-standing fuel subsidies had encouraged the growth of smuggling networks that allegedly generated losses to the State estimated at approximately US$600 million annually. *Id.*

The Supreme Decree No. 5516 of May 13, 2026: Elimination of Fuel Subsidies

On January 13, 2026, President Paz Pereira enacted Supreme Decree No. 5516, establishing final consumer prices for the principal liquid fuels and effectively eliminating the subsidy regime. Under the measure, the price of standard gasoline increased from Bs. 3.74 to Bs. 6.96 per liter, while diesel increased from Bs. 3.72 to Bs. 9.80 per liter. The national newspaper *El Deber* reported that the government justified the measure as necessary to correct market distortions, curb smuggling, and comply with a ruling of the Andean Community Court of Justice questioning price differentiation in Bolivia. *See* Mauricio Quiroz Teran, "Decree 5516: Fuels, Bonuses, Salaries, and Credits—This Is the Government's New Economic and Social Package," *El Deber* (Jan. 13, 2026).

The Decree establishes, through 32 articles, a series of social and economic stability measures, among which the new fuel policy is central.

Among the stated reasons for the new fuel policy, the Decree notes:

- That the previous government administration caused the greatest fuel shortage in national history, leading to long lines, production stoppage, increased logistics costs, and inflationary pressure stemming from rising costs of essential goods and inputs.
- That the shortage was accompanied by serious acts of corruption affecting the state-owned company YPFB and undermining public trust in state administration, thereby compromising energy supply and economic security.
- That the fuel subsidy model proved technically unsustainable, generating market distortions that incentivized the smuggling of approximately 40% of fuel supply to neighboring countries, according to studies by YPFB and international organizations.
- That the subsidized hydrocarbon pricing policy created price differentials with neighboring countries of up to 60%, creating incentives for smuggling networks.

Article 1 of the Decree establishes that its purpose is to "stabilize the prices of petroleum-derived products," with the exception of liquefied petroleum gas (LPG).

Article 2 sets the final consumer prices of those products in order to achieve price stabilization for petroleum derivatives.

Article 3 approves the "Regulation on Prices of Petroleum-Derived Products," establishing a methodology for future price adjustments based on fiscal sustainability and economic efficiency criteria.

The First Effects of Supreme Decree No. 5516—What Comes Next?

One month after implementation of Supreme Decree No. 5516, it was reported that, according to the Ministry of Hydrocarbons and Energies, the stabilization of fuel prices had generated savings exceeding US$400 million due to a reduction in expenditures estimated at approximately US$10 million per day. It was also reported that diesel consumption fell by approximately 50%, suggesting that a significant portion of subsidized fuel had previously been diverted through smuggling to neighboring countries. According to the reports, prior to elimination of the subsidy, daily gasoline and diesel consumption stood at approximately 50,000 barrels per day each. After price stabilization, diesel demand reportedly decreased by approximately 25,000 barrels per day, while gasoline demand declined by approximately 15,000 barrels per day. *See* Daniel Zenteno, "Elimination of Fuel Subsidies Achieved Savings of US$400 Million," *La Razón* (Feb. 1, 2026).

It remains to be seen whether fuel supply conditions will normalize in the coming months. At present, the government has also had to address concerns regarding the quality of imported fuels, which reportedly have caused mechanical problems in vehicles nationwide.

Mattías Garrón, Reporter

Reforming the Bolivian Mining Framework to Unlock National Development and International Investment

Bolivia's mining sector currently operates under a regime of structural isolation that severely limits its vast potential. While the industry has historically been a traditional pillar of the national economy, the regulatory framework established by Law No. 535 has evolved into a bottleneck that discourages capital entry and technological modernization. To align with the global energy transition and remain a competitive jurisdiction within the region, Bolivia is seeking to shift from a restrictive model toward a pragmatic system grounded in legal certainty, operational efficiency, and mutual prosperity.

The most pressing issue is the statutory prohibition on associations between mining cooperatives and the private sector, a restriction established by Law No. 535 and reinforced under Law No. 1140. This creates a structural "capital gap," forcing cooperatives to operate without the CAPEX required for industrial-scale recovery and ESG compliance. One proposed solution is the institutionalization of Strategic Association Contracts. By authorizing joint ventures, offtake agreements, and other instruments, private operators could deploy capital and specialized technology without triggering a transfer of the underlying administrative title. This approach would preserve the cooperative's legal autonomy while creating a bankable structure that allows international investors to mitigate operational risk.

Furthermore, the legislation may need to revisit its classification of lithium. Currently, the law places hard rock lithium—such as spodumene and lepidolite found in pegmatite deposits—within the restrictive "evaporitic resources" regime. Applying a legal framework designed for hydrogeological closed basins to conventional solid-state mining has been criticized as a regulatory mismatch that discourages specialized global operators. By legally distinguishing these resources and classifying hard rock lithium as a conventional metallic mineral, the State could authorize extraction through standard Administrative Mining Contracts (CAMs). Proponents argue that this distinction would help diversify production and facilitate development of deposits that are not naturally suited to the State's evaporation-focused model.

For capital-intensive projects, regulatory unpredictability remains a significant concern. The extended period between signing a contract with the AJAM and securing final legislative approval can create substantial delays and immobilize capital. Introducing a Transitory Operating Authorization could address this issue by granting private actors operational rights during the approval process similar to those currently available to the cooperative sector. Additional proposals include restructuring mandatory sales to state foundries as a regulated right of first refusal. Under such a system, if the State cannot match international market conditions, including treatment charges and payment terms, within a specified timeframe, producers would be permitted to export freely.

Finally, the financial framework must reflect market realities. Critics argue that the cumulative burden of the Mining Surtax can push the effective tax rate to nearly 75%, discouraging high-risk exploration. Proposed reforms include eliminating the surtax, updating thresholds for royalty tax credits, and offering 20-year Tax Stability Pacts. Supporters contend that, if Bolivia adopts these legal reforms through enforceable regulations, it could better align state policy with investor expectations and create a more predictable legal framework for long-term development.

BRAZIL

Tiago de Mattos, Reporter

ANM Suspends Monetary Penalties

On March 20, 2026, the National Mining Agency (ANM) published Deliberation No. 436/2026, suspending the application of monetary penalties provided for in ANM Resolutions No. 122/2022 and No. 223/2025. The suspension covers the issuance of infringement notices imposing fines, the continuation of ongoing administrative sanctioning proceedings involving pecuniary penalties, and acts aimed at constituting or enforcing such fines, including in relation to facts predating the deliberation. At the same time, all non-pecuniary sanctions remain fully available, and inspection activity is expected to continue normally, especially in matters involving dam safety, environmental protection, and unauthorized mining.

From an industry perspective, the measure responds to a central concern raised by the current sanctioning framework: the possibility of exceptionally high fines, often seen as disproportionate and capable of creating regulatory imbalance. In this sense, the suspension creates room for the ANM to revisit the methodology used to define penalty amounts and to work toward a more balanced and defensible monetary sanctioning model.

The Agency's own deliberation confirms that a working group must now review the bases of calculation, quantification methods, reference ranges, dosimetry criteria, and aggravating and mitigating factors, with a proposal due by May 11, 2026.

New CFEM Collection Manual

On March 4, 2026, the National Mining Agency (ANM) adopted Instruction No. 25/2026 and introduced a new CFEM (mining royalties) collection manual. The new framework reorganizes the administrative procedure for royalty collection, standardizes debt assessment notices, requires integration with SEI (electronic system), and consolidates the ANM Board as the final administrative instance in CFEM disputes. In practical terms, it gives the Agency a more structured and unified procedural basis for charging mining royalties.

The measure should also be read in a broader institutional context. At a time when the ANM continues to face pressure to strengthen royalty oversight, and when parts of the public debate still suggest that the industry does not properly pay CFEM, the new manual is likely to support more assertive inspection and collection efforts. More than a technical or procedural update, it tends to reinforce the Agency's ability to intensify scrutiny over royalty compliance and to reduce room for inconsistency in enforcement.

STF Decision on Mining in Indigenous Lands

In one of the most sensitive recent developments in Brazilian mining law, Justice Flávio Dino, of the Supreme Federal Court (STF), ruled in MI 7516 that Congress has failed to regulate the constitutional rules governing mining in indigenous lands and granted the legislature 24 months to enact the required statute. The case concerns the Cinta Larga people and was decided against a factual background marked by illegal mining, territorial violence, and a long-standing regulatory vacuum.

The decision should not be read as a blanket authorization for mining in indigenous territories. Rather, it establishes a provisional constitutional framework centered on indigenous self-determination, the continuation of territorial consultation, the removal of illegal mining, and, if supported by the affected communities and followed by the necessary governmental steps, the possibility of mining activity under indigenous coordination, limited to up to 1% of the territory and subject to the applicable constitutional and legal requirements.

This is a highly sensitive issue, constitutionally, politically, and socially. It is reasonable to expect that, following this decision, new judicial, legislative, and institutional developments will emerge, as the debate over the regulation of mining in indigenous lands is likely to gain renewed momentum in Brazil.

MME Publishes 2026 Guide for Foreign Investors in Critical Minerals

On March 2, 2026, the Ministry of Mines and Energy (MME) published the 2026 edition of *Brazil's Critical Minerals: A Guide for Foreign Investors*. Available in both Portuguese and English, the publication compiles updated information on Brazil's macroeconomic environment, available infrastructure, public support instruments, and ongoing projects in the country, with the stated purpose of offering greater predictability, transparency, and legal certainty to foreign investors interested in the Brazilian mineral chain.

Beyond its descriptive role, the guide also functions as a policy signal. It presents Brazil not only as a country with significant geological potential, but as a jurisdiction actively seeking investment in exploration, mining, and mineral transformation linked to the energy transition, while also encouraging local value addition and international partnerships across strategic mineral chains.

ANM Introduces a Remote Monitoring Policy for Mining Inspection

On April 2, 2026, the National Mining Agency (ANM) instituted the Remote Monitoring Policy for Inspection (PMRF), marking a structural change in the way mining activities are supervised in Brazil. The new policy incorporates geospatial technologies, satellite imagery, geoprocessing, airborne surveys, data analysis, and automated alerts into the inspection process, with the goal of improving the identification of irregularities and directing enforcement actions with greater precision.

The PMRF adopts a layered inspection model built on three levels: automated remote screening, technical analysis of the data collected, and on-site inspections directed by the inconsistencies identified.

In practice, the policy signals the ANM's move toward a more intelligence-led and data-driven supervisory model, designed to anticipate risks, optimize enforcement resources, and make field inspections more targeted and efficient.

CHILE

Alejandro Montt, Reporter

Amendment to the Environmental Impact Assessment System Regulations

On January 21, 2026, Supreme Decree No. 17 of the Ministry of the Environment (DS 17/2025) was published in the Official Gazette, amending Supreme Decree No. 40 of 2012, which establishes the Regulations of the Environmental Impact Assessment System (SEIA Regulations). The amendment entered into force on its publication date. The Office of the Comptroller General (*Contraloría General de la República*) had cleared the text on December 31, 2025, following a process that included a public consultation in February 2025 and unanimous approval by the Council of Ministers for Sustainability and Climate Change in June 2025.

The reform responds to a finding by the Environmental Assessment Service (SEA) that the SEIA had been receiving project submissions that did not always correspond to significant environmental risks, either because more robust sectoral frameworks had since emerged or because improved technologies had reduced potential impacts. The stated purpose of DS 17/2025 is to modernize the SEIA by updating entry criteria and thresholds, making the system more efficient and predictable without reducing environmental protection standards. As the Minister of the Environment highlighted, the objective is to concentrate the system's evaluation efforts on projects with genuinely significant environmental impacts. The reform is part of the broader permitting modernization agenda advanced through the Framework Law on Sectoral Authorizations (Law No. 21,770 of 2025).

The reform has cross-cutting effects across a wide range of industries, including energy and power transmission, data centers, manufacturing, fuel and chemical storage, real estate and urban development, tourism, mining, agriculture, transport and logistics, water and sanitation, waste management, and healthcare.

Updated Project Typologies and Entry Thresholds

The most extensive set of changes involves the revision of entry thresholds and criteria for typology categories in Article 3. In general, thresholds were increased substantially for hazardous substance storage and transport (toxic, explosive, flammable, corrosive, and reactive substances), reflecting the adequacy of existing sectoral chemical safety regulations for smaller inventories. New volume-based criteria replaced population-based metrics for several waste facility typologies, and existing criteria for power infrastructure, liquid industrial effluents, and aquaculture were clarified and updated to reflect technological and regulatory developments. A summary table of the principal modifications to Article 3 is set out at the end of this section.

New Definitions and Technical Criteria

DS 17/2025 introduces and clarifies several operational definitions relevant to the treatment and disposal of water and waste, aligning the SEIA Regulations with applicable sectoral frameworks. These include definitions of treatment and disposal drawn from Law No. 20,920 on Extended Producer Responsibility (Ley REP), distinctions within waste hierarchies for solid and liquid residues, and hazard classification criteria applicable to toxic, explosive, flammable, corrosive, and reactive substances under NCh 382:2013 and DS 148/2003. Project proponents will need to review how their activities are characterized under these updated references before determining whether SEIA entry thresholds apply.

Revised Criteria for Project Modifications

DS 17/2025 introduces a significant limitation on the so-called material change criterion that triggers the obligation to re-enter the SEIA when an approved project is modified. Under amended Article 2(g.1), a modification to a project is not treated as a material change, and therefore does not require a new SEIA proceeding, when the relevant works, activities, or components involve the same typologies under which the project was originally assessed and approved (as reflected in its RCA), provided

that the environmental impacts and mitigation measures already evaluated are not substantially altered. In cases where the typology match applies, the analysis of materiality should proceed only under the remaining criteria of Article 2(g), not under the typology criterion alone.

This change is significant for holders of existing projects, as it reduces the risk that operational or infrastructure adjustments within the scope of the originally approved typologies will trigger a full re-entry into the SEIA. Proponents should nonetheless verify that the proposed modification does not introduce new or substantially different environmental effects relative to the evaluated baseline, as the exception is conditional on the absence of material impact changes.

Effective Date and Transitional Rules

DS 17/2025 entered into force on January 21, 2026. Projects that had formally completed their submission in the e-SEIA platform prior to that date continue under the prior regime (DS 40/2012), including their admissibility review. Entry into the SEIA is understood to have occurred only when the five-business-day admissibility period begins to run. Projects that had not finalized their e-SEIA upload and submission as of January 21, 2026, must be re-submitted on the updated platform under the new thresholds and typologies.

DS 17/2025 is significant for investors in both new and existing projects in Chile. For new projects, the updated thresholds mean that certain investments, including smaller transmission lines, lower-volume hazardous substance facilities, smaller aquaculture operations, and certain real estate and tourism projects, may no longer require full SEIA review, resulting in shorter permitting timelines and reduced costs. Investors should nonetheless carefully assess whether their projects still trigger SEIA entry under the revised criteria, as projects falling below the thresholds remain subject to sectoral regulations without any deregulatory gap. For existing project holders, the modified criteria for project modifications reduce the administrative burden and legal uncertainty associated with incremental operational changes within previously evaluated typologies.

Table 1. Principal Modifications to Article 3 of the SEIA Regulations (DS 17/2025)

Project Category / Literal	Prior Rule (DS 40/2012)	Amended Rule (DS 17/2025)	Sectors Affected
b.1 - High-voltage power lines	All lines exceeding 23 kV must enter the SEIA, regardless of length.	Lines exceeding 23 kV are required to enter the SEIA only when the route spans more than 2 km. Shorter connections (e.g., substation tie-ins for storage or industrial projects) are excluded from mandatory review.	Power generation & transmission; battery storage; data centers.
e.6 - Fuel service stations	Storage capacity at or above 200,000 liters triggers SEIA review.	Threshold raised to 850,000 liters, reflecting that smaller stations are adequately covered by existing sectoral fuel-safety regulations.	Fuel distribution & retail.
g.1.2.b - Real estate / equipment projects	Total plot area ≥ 20,000 m2 triggers SEIA review.	Threshold recalibrated to 15,000 m2 of area to be intervened (i.e., actually disturbed), rather than total parcel size. Smaller intervention footprints on large lots no longer trigger SEIA.	Real estate; urban development.
g.2.b - Tourism development	Total plot area ≥ 15,000 m2 triggers review.	Threshold remained at 15,000 m2 but clarified to refer to the area to be intervened, aligning with the approach adopted for real estate projects.	Tourism & hospitality.
i / i.6 - Peat extraction	Peat extraction is an explicit SEIA typology, defined separately in literal i.6.	Reference to peat removed from the heading of literal i; literal i.6 eliminated in full. Peat extraction is now governed entirely by applicable sectoral regulations.	Mining; agriculture.
i.1 - Mining / tailings reprocessing	No explicit exemption for reprocessing existing tailings deposits.	New exemption for operators holding a valid RCA: reprocessing fresh tailings or recovering bulk mining waste within an active operation is excluded from	Mining.

Project Category / Literal	Prior Rule (DS 40/2012)	Amended Rule (DS 17/2025)	Sectors Affected
		SEIA if the additional capacity remains below 25% of the permitted processing rate (consistent with the Mining Safety Regulations threshold).	
n.1 - Macroalgae cultivation	Annual production ≥ 500 t/year requires SEIA review.	Threshold doubled to 1,000 t/year, removing smaller commercial seaweed farms from mandatory review.	Aquaculture; food industry.
n.2 - Filter-feeding molluscs	Production > 300 t/year and/or surface > 60,000 m2 (or > 40 ha for certain species).	Simplified and raised: production ≥ 1,000 t/year and/or surface ≥ 60,000 m2. Prior split criteria consolidated into a single, higher threshold.	Aquaculture; seafood processing.
ñ.1 - Toxic substances	Storage of ≥ 30 t of toxic substances requires review.	Threshold raised sharply to ≥ 2,500 t in storage, aligned with the hazard classification in NCh 382:2013 and DS 148/2003. Smaller inventories are handled under sectoral chemical-safety rules.	Chemicals; industry; data centers.
ñ.2 - Explosive substances	Storage ≥ 2,500 kg triggers SEIA.	Threshold increased to ≥ 30 t, reflecting the robustness of dedicated explosives regulations for smaller quantities.	Mining; quarrying; demolition.
ñ.3 - Flammable substances	Storage ≥ 80,000 kg requires review.	Threshold raised to ≥ 1,000 t. Relevant for battery-storage and data-center projects that use flammable coolants or fuels below this volume.	Energy; chemicals; data centers.
ñ.4 - Corrosive / reactive substances	Storage ≥ 120,000 kg triggers review.	Threshold elevated to ≥ 2,500 t, consistent with the revised approach to other hazardous-substance categories.	Chemicals; manufacturing.
ñ.5 - Overland transport of dangerous goods	Daily throughput ≥ 400 t/day triggers SEIA.	Threshold raised to ≥ 2,500 t/day, reducing the compliance burden on logistics operations that already comply with transport-safety regulations.	Transport & logistics.
o.3 - Drinking water supply	Systems serving populations ≥ 10,000 inhabitants require review.	Population threshold raised to 15,000 inhabitants, consistent with updated sizing criteria in the sanitation sector.	Water & sanitation; real estate.
o.4 - Domestic wastewater treatment	Plants serving ≥ 2,500 inhabitants require review.	Threshold doubled to 5,000 inhabitants, reducing the regulatory burden on small and mid-size treatment facilities.	Water & sanitation; real estate.

Project Category / Literal	Prior Rule (DS 40/2012)	Amended Rule (DS 17/2025)	Sectors Affected
o.5 - Domestic solid waste	Facilities serving ≥ 5,000 inhabitants trigger review.	Metric converted from population to tonnage: facilities disposing of ≥ 30 t/day now trigger review, regardless of catchment population. Aligns with the waste hierarchy introduced by the Extended Producer Responsibility Law (No. 20,920).	Waste management.
o.7 - Liquid industrial effluents (RILes)	General criteria referenced use for irrigation, lagoons, or population supply, without specific volume thresholds.	Replaced by specific volume thresholds: irrigation or spray application ≥ 50 m3/day; treatment of liquid effluents ≥ 160 m3/day. The new rule applies uniformly across agricultural, livestock, and industrial operations.	Industry; sanitation; agro-industry.
o.8 - Industrial solid waste	Disposal ≥ 50 t or treatment ≥ 30 t/day triggers review.	Reformulated: elimination ≥ 30 t/day; organic treatment or sludge treatment ≥ 30 t/day. Incorporates definitions of treatment and elimination aligned with Law No. 20,920.	Waste management; manufacturing.
o.9 - Hazardous waste	Capacity ≥ 25 kg/day (acutely toxic) or ≥ 1,000 kg/day (other categories).	Elimination: ≥ 25 kg/day (acute toxicity) or ≥ 1 t/day (other). Treatment: ≥ 5 t/day. Clearer distinction between elimination and treatment activities, with updated references to sectoral hazardous-waste rules.	Waste management; manufacturing; industries.
o.10 - Healthcare waste	Facilities with capacity ≥ 250 kg/day require review.	Threshold raised to an intake rate of ≥ 500 kg/day, reflecting improved handling standards in the healthcare sector.	Healthcare; waste management.

New Law on the Use of Seawater for Desalination

On March 25, 2026, the Chilean Senate dispatched Bill No. 11,608-09, regulating the use of seawater for desalination, after endorsing in its third legislative proceeding the amendments introduced by the Chamber of Deputies. The bill was sent to the President for promulgation following more than eight years of legislative deliberation. The new law establishes a comprehensive regulatory framework for the sustainable development of seawater extraction and desalination projects in Chile, with the stated objectives of contributing to water security, improving climate change adaptation, and safeguarding marine and coastal biodiversity.

Prior to this law, the applicable regulatory framework for desalination was limited and did not contemplate a specific concession type or a dedicated legal regime addressing the technical, operational, and regulatory particularities of desalination projects. The result was a fragmented permitting landscape in which plants, pipelines, and intake infrastructure advanced without a unified sectoral framework, creating zones of legal uncertainty that weighed on investment timelines. One parliamentary analysis cited the case of a representative project that could require up to eleven years and seven months to assemble all necessary permits before beginning water production. The new law is designed to correct this structural gap.

Chile is the world's largest copper producer, and mining operations in the arid north face acute and growing freshwater constraints. Industry data indicate that approximately 85% of installed desalination capacity currently serves the copper mining sector. The National Copper Commission (Cochilco) projects that total water consumption in the mining sector will rise from 18.5 m³/s in 2024 to 20.6 m³/s by 2034, reinforcing the strategic importance of non-continental water sources. ACADES has indicated that the law could help unlock an investment pipeline in desalination estimated at approximately US$20 billion, particularly in multipurpose projects serving mining, industrial, agricultural, and human consumption needs simultaneously.

The principal elements of the new law are described below:

(1) National Desalination Strategy. The law creates a National Desalination Strategy, to be elaborated by the Directorate General of Waters (DGA) as a national planning instrument and approved inter-sectorally. The Strategy will establish orientations and priorities for

the use of seawater and the siting of desalination plants. Conformity with the Strategy is a prerequisite for obtaining a desalination concession. ACADES has noted that timely elaboration of the Strategy, together with the enabling regulations governing concession procedures, will be critical for the law to deliver its full investment potential.

(2) New Maritime Desalination Concession. The law creates a specific concession regime for the use of seawater in desalination projects, distinct from the general maritime concession framework. Concessions are granted for a term of 30 years, renewable once, subject to a favorable prior report from the DGA. The current concession holder will have preference in the renewal process. The specific requirements for granting the concession will be set out in regulations issued by the Ministry of Public Works (MOP) and countersigned by the Ministry of National Defense. The law also addresses the practical challenge of inland water conveyance by regulating easements for pipelines and aqueducts needed to transport desalinated water from coastal plants to inland points of use.

(3) Priority for Human Consumption. For projects whose primary purpose is not to supply human consumption or sanitation, the DGA may require a contribution of up to 5% of production flow for those purposes. This provision incorporates a public interest criterion into the development of desalination projects, aiming to ensure that large-scale industrial investments also contribute to addressing water access needs in surrounding communities.

(4) Compatibility with Protected Areas. Concessions must strictly comply with applicable environmental regulations, particularly those under the law creating the Biodiversity and Protected Areas Service (SBAP). This requirement applies wherever project works intersect with land or marine areas under official protection.

(5) Strengthened DGA Enforcement Powers. The law reinforces the DGA's supervisory role, authorizing it to oversee compliance with concession obligations and to impose sanctions for violations of up to 10,000 UTA (Monthly Tax Units). In cases of serious infractions, the DGA may declare the concession forfeited. In practice, this enforcement framework is a significant addition to the concession regime, as prior to this law there was no specific sanctioning system applicable to seawater use for desalination.

(6) New SEIA Entry Requirement. The law introduces a new mandatory entry typology into the Environmental Impact Assessment System (SEIA), requiring industrial-scale desalination plants and projects involving intensive seawater extraction to submit to environmental review. This is a notable change from the prior regulatory landscape, where the SEIA entry obligation for desalination projects was not explicitly defined in the SEIA Regulations and was determined on a case-by-case basis.

(7) Amendment to the General Law of Urban Planning and Construction (LGUC). The law introduces adjustments to the LGUC aimed at harmonizing land-use regulations and facilitating the installation and operation of desalination plants within the existing regulatory framework. This amendment addresses a recurring practical problem: uncertainty over whether a desalination plant qualifies as equipment, an industrial facility, or another land-use category under applicable zoning plans, which in some cases had required modifications to local regulatory plans (*planes reguladores*) before plants could be sited.

The new desalination law represents a material improvement in the legal framework governing desalination projects in Chile. By establishing a unified concession regime with defined terms, a clear priority-of-use hierarchy, an explicit SEIA typology, and a dedicated enforcement mechanism, the law removes several categories of legal uncertainty that had historically complicated project structuring and financing. Mandatory conformity with the National Desalination Strategy introduces an element of conditionality that investors will need to monitor closely, as the Strategy's content and timeline will directly affect the scope of permissible projects in each basin. Mining companies and other industrial users developing projects in water-stressed regions will benefit from a more predictable pathway for securing seawater supply, reducing reliance on increasingly constrained continental sources. The DGA's new enforcement powers, including the ability to forfeit concessions in serious cases, also introduce a compliance dimension that project operators and their lenders will need to factor into concession management frameworks.

Joaquín Corvalán Azpiazu, Reporter

Publication of Law No. 21,800 Regulating the Extraction of Aggregates

On February 24, 2026, Law No. 21,800, regulating the extraction of aggregates, was published in the Official Gazette. The purpose of the law, as set forth in Article 1, is to regulate the extraction of aggregates, certificates of origin, traceability, prohibited areas and conditions, oversight, and closure plans in locations determined by the authority. The publication of this law responds to the need for a comprehensive and uniform regulatory framework for the extraction of aggregates in Chile.

The applicable regime is regulated in Article 4 of the law, which provides that the extraction of aggregates both (1) in natural watercourses not navigable by vessels exceeding 100 tons and (2) in regulation zones adjacent to the watercourse, must be carried out with authorization from the respective municipalities, preceded by technical approval from the Directorate of Hydraulic Works of the Ministry of Public Works. A dual permit system is thus established, and two types of application zones are distinguished.

Law No. 21,800 also establishes two crimes. First, the crime of "forgery of traceability documentation" (Art. 15), which criminalizes and punishes the forgery or tampering of certificates of origin, technical certifications, and authorizations. Second, the crime of "repeat illegal extraction" (Art. 17), which provides that anyone who extracts aggregates without authorization or technical approval shall be subject to criminal penalties if they have been administratively sanctioned more than once for the same conduct within the preceding two years. These offenses could be classified as economic crimes.

Law No. 21,800 enters into force one year after its publication in the Official Gazette, that is, on February 24, 2027. Within that same period, regulations must be issued to supplement the law with certain procedural and technical aspects necessary for its implementation. Authorizations granted prior to the effective date of Law No. 21,800 will continue to be governed by the regulations in effect at the time the respective authorizations were

granted; however, if renewal of such authorizations is required, they will be subject to the new law.

The Environmental Assessment Service Publishes New Guidelines for the Description of Projects Involving Lithium and Other Mineral Substances from Salt Flats

On February 27, 2026, an excerpt from a resolution of the Environmental Assessment Service was published in the Official Gazette addressing compliance with the "Guidelines for the Description of Projects for the Extraction of Lithium and Other Mineral Substances from Salt Flats."

This second guide incorporates guidelines for describing the components, works, and activities associated with the use of direct lithium extraction technologies and updates the information presented in the first guide (2021), particularly regarding lithium extraction using solar evaporation pond technology in relation to monitoring systems, process control, and measures to prevent environmental impacts.

This new version of the guide is intended to assist project proponents in describing their projects with an appropriate level of detail to enable evaluators to understand and identify potential environmental impacts in connection with the minimum information required for an Environmental Impact Study or Environmental Impact Statement.

VENEZUELA

Milton Fernando Montoya Pardo & Manuel José Ocampo Hernández, Guest Reporters

New Organic Mining Law

Introduction

The National Assembly of Venezuela approved the country's new Organic Mining Law, which was published in the Official Gazette on April 6, 2026. With this publication, Venezuela now has a new law establishing the legal framework governing all Venezuelan and foreign individuals intending to conduct mining activities in the country.

With the adoption of this Law, the Venezuelan National Assembly unified the regulation of mining activity in the country. This was achieved by repealing two decrees of paramount importance within the country's legal system: (1) the 1999 "Decree with the Rank and Force of a Mining Law" and (2) the 2015 "Decree with the Rank, Value, and Force of an Organic Law Reserving to the State the Activities of Exploration and Exploitation of Gold and Other Strategic Minerals."

Likewise, according to analyses carried out regarding this Law, it is expected that its implementation will establish a regulatory framework that, in principle, promotes the following:

- Legal certainty.
- Transparency.
- Unification of the regulatory framework.

As previously mentioned, the new Organic Mining Law seeks, among other things, to unify the regulation of mining activity in Venezuela into a single legal framework and to provide greater flexibility for mining activity in the country. This is significant because, until now, Venezuelan mining regulations were primarily based on decrees enacted in 1999 and 2015 that, in practice, effectively nationalized the mining sector.

Main New Features of the Organic Mining Law

One of the most relevant aspects is the classification of mining activity into clearly differentiated scales, regulated in Articles 79 to 82 of the Law:

- Small-scale mining, defined as mining carried out in areas no larger than 25 hectares, with a processing capacity of between 1 and 350 tons of material per day.
- Medium-scale mining, carried out in areas not exceeding six parcel units, equivalent to 3,078 hectares, with a capacity for storing and transporting mining material greater than 350 tons and less than 4,400 tons per day.
- Large-scale mining, carried out in areas of up to 5,000 hectares, with a processing capacity of more than 4,400 tons of primary material per day.

In addition to this classification of mining activity, Article 83 of the Law defines "artisanal mining" as "[t]he personal and direct activity in the exploitation of minerals, using manual, simple, portable equipment that is not harmful to the environment, with rudimentary extraction and processing techniques, and which can only be carried out by natural persons of Venezuelan nationality who possess a mining license."

This classification is relevant because, depending on the type of mining activity carried out, authorization from the State must be obtained. In this regard, the Law defines the legal instruments through which mining activity will be conducted, regulated in Articles 60 to 74. According to these provisions, large-scale mining activities will require a mining concession, while small- and medium-scale mining activities, as well as artisanal mining, will require a mining license. In addition, the State may grant mining contracts for specific activities or operations within the sector. This differentiation of instruments seeks to adapt the legal mechanism to the scale and nature of each operation.

Another aspect considered relevant in this Law is the expansion of the entities permitted to carry out mining activities, in accordance with Article 5. Pursuant to this article, the following entities may conduct such activities:

- Companies wholly owned by the Republic or its subsidiaries.
- Mixed enterprises, that is, enterprises in which the Republic or a public entity holds more than 50% of the share capital, thereby granting it a controlling interest. This also includes companies in which the Republic has a minority stake, provided they are authorized by the State.
- Private companies authorized by the State, in accordance with the Law and its implementing regulations. Notably, such companies are no longer required to be domiciled in Venezuelan territory.
- Mining brigades and natural persons carrying out artisanal mining individually or in duly registered and authorized groups.

It is also important to refer to the new institutional architecture for mining established by the Law in Articles 10 to 22. Five key entities are created or strengthened:

- The Ministry of People's Power for Ecological Mining Development and Basic Industries is established as the governing body responsible for formulating public policies for mining activity.

- The National Bank of Geoscientific-Mining Data will serve as the official repository of geological, geophysical, geochemical, geotechnical, geomatic, mining, and geoscientific information for Venezuela.
- The National Superintendency of Mining Activity will have functions of supervision, control, inspection, auditing of mining activity, and administration of taxes and royalties.
- The National Institute of Geology and Mining will be responsible for scientific research related to mining activity.
- Finally, the National Mining Guard will serve as an auxiliary body of the Ministry, with powers of protection, inspection, surveillance, and control of mining activities in Venezuelan territory.

Specific Changes Under the New Law

First, the State is transitioning from being the sole operator to acting as regulator and owner, while permitting mining activity under a more flexible contractual framework. This represents a significant shift for the Venezuelan mining industry.

Second, mining activity is now more broadly permitted to private and foreign entities. This potentially opens the door to investment flows that were previously limited.

Third, the Law creates the National Superintendency of Mining Activity as a supervisory and regulatory body, as well as the National Bank of Geoscientific-Mining Data as a scientific institution intended to improve understanding of Venezuela's mining resource potential.

Finally, and perhaps most significantly, the state reserve over the exploitation of gold and strategic minerals would no longer exist. This reserve was established in 2015 by decree with the force of law and significantly restricted private participation in these sectors. Its elimination marks a substantial shift in Venezuelan mining policy.

Conclusions

With the adoption of this Law, Venezuelan mining activity is organized under a single, comprehensive legal framework. This represents progress in terms of regulatory coherence and establishes the possibility of sustainably exploiting natural resources while potentially generating positive impacts for communities and investors.

The new Organic Mining Law may also establish clearer and more predictable rules for both domestic and foreign investors, potentially positioning Venezuela as a more attractive destination for investment in the extractive sector. However, certain areas may still require further regulatory development, including environmental protection, human rights safeguards, mine closure, business-sector due diligence, citizen participation, and the illegal extraction of mineral deposits.

The Foundation
FOR NATURAL RESOURCES AND ENERGY LAW
FORMERLY ROCKY MOUNTAIN MINERAL LAW FOUNDATION

2095 West 6th Ave., Suite 109
Broomfield, Colorado 80020
www.fnrel.org