

Elements of Settlement

- All RPs (with indemnity for DOD from Jackson Campbell Inc) will comply with the 106 order and the threatened cost recovery
 - Enter consent decree for remediation
 - Restoration: RPs will fund assessment (w DOD contribution in kind)
 - Two remaining RPs will pay restoration (Jackson Campbell and Halter Mining, including parent)
- Agreed re NRD claim: Colorado, Haddad Hopi (with role in restoration), FWS (including intellectual capital)
- Oso Negro – willing to forego removal if EPA decides
- Removal if EPA says yes, RPs will do