



March 2, 2011

THE PHILIPPINE STOCK EXCHANGE, INC.
3rd Floor, Philippine Stock Exchange Plaza
Ayala Triangle, Ayala Avenue, Makati City

Attn.: **Ms. Janet A. Encarnacion**
Head, Disclosure Department

Ms. Marsha M. Resurreccion
OIC, Issuer Regulation Division

Re: Revised Report on Disbursements of Proceeds from SRO

This is acknowledged receipt of your letter dated February 28, 2011. Please see our revised summary of reports on receipts and disbursement from the Company's Stock Rights Offering proceeds to date in lieu of previous disclosures, as follows:

| <u>INTENDED USE OF PROCEEDS</u> | <u>Amount per SRO</u> <u>(Php)</u> | <u>Amount Used</u> <u>(Php)</u> |
|--|---------------------------------------|------------------------------------|
| <i>Equity in SEM-Calaca Power Corporation</i> | 2,700,000,000.00 ¹ | 2,700,000,000.00 |
| <i>Marubeni Debt (Equipment, USD\$32.5M)</i> | 1,446,250,000.00 | -0- |
| <i>Bank Debt (BPI)</i> | 193,191,384.59 ² | 193,191,384.59 |
| <i>Capital Expenditure (Tugboats & Barges)</i> | 445,000,000.00 | 445,000,000.00 ³ |
| <i>Capital Expenditure (Mining Equipment)</i> | 445,000,000.00 | 445,000,000.00 ⁴ |
| <i>Total Estimated Use of Proceeds per SRO</i> | <u>5,229,441,384.59</u> | - |
| <i>Total Actual Utilization as December 31, 2010</i> | | 3,783,191,385.00 |
| <i>Actual SRO net proceeds</i> | | <u>4,383,383,237.00</u> |
| <i>Balance Unutilized as of December 31, 2010</i> | | <u>600,191,852.41</u> |

Our explanation for the revisions is indicated in the footnotes. As to the Auditor's Certification, we request for a period of fifteen (15) days from March 7, 2011, the latter being the scheduled approval of the Company's Audited Financial Statements, within which to submit the same.

¹ Disclosed on July 30, 2010

² Ibid.

³ We disclosed PhP477,236,293.00 on July 30, 2010 for capital expenditure without distinction. To be specific the amount of PhP445,000,000.00 was utilized for tugboats and barges and the excess PhP32,236,293.00 for mining equipment.

⁴ We wish to correct our February 18, 2011 disclosure indicating PhP201,842,179.66 for mining equipment as this erroneously included the amount of PhP106,835,897.16 paid by the corporation with internally generated funds for the mining equipment. With the utilization of PhP32,236,293.00 (refer to immediately preceding), PhP317,757,424.50 (as disclosed on October 19, 2010) and PhP95,006,282.50 (part of PhP201,842,179.66), the allocated amount for mining equipment has been fully utilized.



**SEMIRARA
MINING
CORPORATION**

We hope the above merits your consideration.

Thank you.

SEMIRARA MINING CORPORATION

By:


JOHN R. SADULLO
Corporate Secretary