

APEX SILVER MINES LTD  
 Form 4  
 November 29, 2006

**FORM 4** UNITED STATES SECURITIES AND EXCHANGE COMMISSION  
 Washington, D.C. 20549

OMB APPROVAL  
 OMB Number: 3235-0287  
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Check this box if no longer subject to Section 16. Form 4 or Form 5 obligations may continue. See Instruction 1(b).

**STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP OF SECURITIES**

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934, Section 17(a) of the Public Utility Holding Company Act of 1935 or Section 30(h) of the Investment Company Act of 1940

(Print or Type Responses)

1. Name and Address of Reporting Person \*  
**HULLEY KEITH R**

(Last) (First) (Middle)

1700 LINCOLN STREET, SUITE 3050

(Street)

DENVER, X1 80203

(City) (State) (Zip)

2. Issuer Name and Ticker or Trading Symbol  
**APEX SILVER MINES LTD [SIL]**

3. Date of Earliest Transaction (Month/Day/Year)  
 11/27/2006

4. If Amendment, Date Original Filed(Month/Day/Year)

5. Relationship of Reporting Person(s) to Issuer

(Check all applicable)

Director  10% Owner  
 Officer (give title below)  Other (specify below)

6. Individual or Joint/Group Filing(Check Applicable Line)  
 Form filed by One Reporting Person  
 Form filed by More than One Reporting Person

**Table I - Non-Derivative Securities Acquired, Disposed of, or Beneficially Owned**

| 1. Title of Security (Instr. 3) | 2. Transaction Date (Month/Day/Year) | 2A. Deemed Execution Date, if any (Month/Day/Year) | 3. Transaction Code (Instr. 8) | 4. Securities Acquired (A) or Disposed of (D) (Instr. 3, 4 and 5) | 5. Amount of Securities Beneficially Owned Following Reported Transaction(s) (Instr. 3 and 4) | 6. Ownership Form: Direct (D) or Indirect (I) (Instr. 4) | 7. Nature of Ownership (Instr. 4) |
|---------------------------------|--------------------------------------|--|--------------------------------|---|---|--|-----------------------------------|
|                                 |                                      |  |                                | (A) or (D)  | Price   |  |                                   |
| Ordinary Shares                 | 11/27/2006                           |  | M                              | 20,000  | A \$ 9.125  | 71,804   | D                                 |
| Ordinary Shares                 | 11/27/2006                           |  | S                              | 3,900   | D \$ 16.78  | 67,904   | D                                 |
| Ordinary Shares                 | 11/27/2006                           |  | S                              | 1,100   | D \$ 16.77  | 66,804   | D                                 |
| Ordinary Shares                 | 11/27/2006                           |  | S                              | 2,900   | D \$ 16.9   | 63,904   | D                                 |
| Ordinary Shares                 | 11/27/2006                           |  | S                              | 2,100   | D \$ 16.92  | 61,804   | D                                 |

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|                 |            |   |        |   |          |        |   |
|-----------------|------------|---|--------|---|----------|--------|---|
| Ordinary Shares | 11/27/2006 | S | 9,600  | D | \$ 16.68 | 52,204 | D |
| Ordinary Shares | 11/27/2006 | S | 300    | D | \$ 16.69 | 51,904 | D |
| Ordinary Shares | 11/27/2006 | S | 100    | D | \$ 16.7  | 51,804 | D |
| Ordinary Shares | 11/28/2006 | M | 5,000  | A | \$ 9.125 | 56,804 | D |
| Ordinary Shares | 11/28/2006 | M | 9,300  | A | \$ 9.27  | 66,104 | D |
| Ordinary Shares | 11/28/2006 | S | 5,000  | D | \$ 16.65 | 61,104 | D |
| Ordinary Shares | 11/28/2006 | S | 1,300  | D | \$ 16.75 | 59,804 | D |
| Ordinary Shares | 11/28/2006 | S | 2,000  | D | \$ 16.8  | 57,804 | D |
| Ordinary Shares | 11/28/2006 | S | 1,000  | D | \$ 16.75 | 56,804 | D |
| Ordinary Shares | 11/28/2006 | S | 4,400  | D | \$ 16.66 | 52,404 | D |
| Ordinary Shares | 11/28/2006 | S | 300    | D | \$ 16.7  | 52,104 | D |
| Ordinary Shares | 11/28/2006 | S | 200    | D | \$ 16.69 | 51,904 | D |
| Ordinary Shares | 11/28/2006 | S | 100    | D | \$ 16.68 | 51,804 | D |
| Ordinary Shares | 11/29/2006 | M | 10,000 | A | \$ 9.27  | 61,804 | D |
| Ordinary Shares | 11/29/2006 | S | 600    | D | \$ 16.78 | 61,204 | D |
| Ordinary Shares | 11/29/2006 | S | 9,400  | D | \$ 16.75 | 51,804 | D |

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

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(9-02)

**Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned**  
(e.g., puts, calls, warrants, options, convertible securities)

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| 1. Title of Derivative Security (Instr. 3) | 2. Conversion or Exercise Price of Derivative Security | 3. Transaction Date (Month/Day/Year) | 3A. Deemed Execution Date, if any (Month/Day/Year) | 4. Transaction Code (Instr. 8) | 5. Number of Derivative Securities Acquired (A) or Disposed of (D) (Instr. 3, 4, and 5) | 6. Date Exercisable and Expiration Date (Month/Day/Year) | 7. Title and Amount of Underlying Securities (Instr. 3 and 4) |                 |                            |
|--|--|--------------------------------------|--|--------------------------------|---|--|---|-----------------|----------------------------|
|  |  |                                      |  | Code                           | V (A) (D)   | Date Exercisable   | Expiration Date   | Title           | Amount or Number of Shares |
| Employee Share Options (Right to Buy)      | \$ 9.125   | 11/27/2006                           |  | M                              | 20,000  | 12/13/2000 12/13/2010                                    |   | Ordinary Shares | 20,000                     |
| Employee Share Options (Right to Buy)      | \$ 9.125   | 11/28/2006                           |  | M                              | 5,000   | 12/13/2000 12/13/2010                                    |   | Ordinary Shares | 5,000                      |
| Employee Share Options (Right to Buy)      | \$ 9.27  | 11/28/2006                           |  | M                              | 9,300   | 12/13/2001 12/13/2011                                    |   | Ordinary Shares | 9,300                      |
| Employee Share Options (Right to Buy)      | \$ 9.27  | 11/29/2006                           |  | M                              | 10,000  | 12/13/2001 12/13/2011                                    |   | Ordinary Shares | 10,000                     |

## Reporting Owners

| Reporting Owner Name / Address  | Relationships |           |         |       |
|---|---------------|-----------|---------|-------|
|   | Director      | 10% Owner | Officer | Other |
| HULLEY KEITH R<br>1700 LINCOLN STREET<br>SUITE 3050<br>DENVER, X1 80203 |               | X         |         |       |

## Signatures

/s/Robert P. Vogels for Keith R. Hulley Pursuant to Power of Attorney

11/29/2006

\*\*Signature of Reporting Person

Date

## Explanation of Responses:

\* If the form is filed by more than one reporting person, *see* Instruction 4(b)(v).

\*\* Intentional misstatements or omissions of facts constitute Federal Criminal Violations. *See* 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, *see* Instruction 6 for procedure.

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