



Suzanne Steab <suzannesteab@utah.gov>

AVS Questions

3 messages

Suzanne Steab <suzannesteab@utah.gov>
To: "lkeene@osmre.gov" <lkeene@osmre.gov>

Wed, Jun 9, 2021 at 11:57 AM

Hello Linda,

I was hoping you could clarify a couple of things for me. We are delving into the Murray Energy permit transfers in Utah and a couple of questions have come up.

Invesco Oppenheimer Senior Floating Rate Fund is listed as 100% owner of ACNR Holdings Inc., but there are no officers or directors listed for Invesco. Is this ok per rule?

Also, when looking at the org chart for Utah Land Resources and Emery County Coal Resources, ULR and ECCR and all of the companies in the chain up to Invesco don't show any officers and directors owning any portion of the companies in the AVS.

Is this correct and ok per the rules? I am assuming no officer or director owns more than 10%? Is this a correct assumption?

--
Suzanne Steab, Engineering Technician II
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(801) 538-5265

 **Tower FIGURE 1-1.pdf**
268K

Keene, Linda L. <lkeene@osmre.gov>

Wed, Jun 9, 2021 at 1:21 PM

To: Suzanne Steab <suzannesteab@utah.gov>, "Campbell, Benjamin T" <bcampbell@osmre.gov>

Hi Suzanne,

I am going to ask you to work with Tyler on this. He made these updates.

Thanks!

Linda Keene
AVS OSMRE
859-559-2393

From: Suzanne Steab <suzannesteab@utah.gov>**Sent:** Wednesday, June 9, 2021 1:57 PM**To:** Keene, Linda L. <lkeene@osmre.gov>**Subject:** [EXTERNAL] AVS Questions

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 **Tower FIGURE 1-1.pdf**
268K

Campbell, Benjamin T <bcampbell@osmre.gov>
To: Suzanne Steab <suzannesteab@utah.gov>, "Keene, Linda L." <lkeene@osmre.gov>

Wed, Jun 9, 2021 at 1:45 PM

Suzanne,

I go by Tyler, my middle name. It usually creates a little confusion given my email name, but I'll answer to either.

To answer your first question, a company with no permits is not required to list officers. Those companies are in the system simply because of their ownership percentages.

As for your second questions, I believe your assumption is correct. No individual owns more than 9% and is thus not listed as an owner. I'm attaching the file that we have so you can see what the company submitted. I did a quick glance and no individual was listed as an owner.

Let me know if you have any additional questions. Thank you.

Tyler Campbell
Program Analyst
Applicant/Violator System Office
Office of Surface Mining Reclamation and Enforcement
Office: 859-260-3927
Personal Cell: 865-719-1566

From: Suzanne Steab <suzannesteab@utah.gov>
Sent: Wednesday, June 9, 2021 3:31 PM
To: Keene, Linda L. <lkeene@osmre.gov>
Cc: Campbell, Benjamin T <bcampbell@osmre.gov>
Subject: Re: [EXTERNAL] AVS Questions

Thanks...Ben, are you Tyler? What say you?

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 **263454 ACNR Land Resources Inc.pdf**
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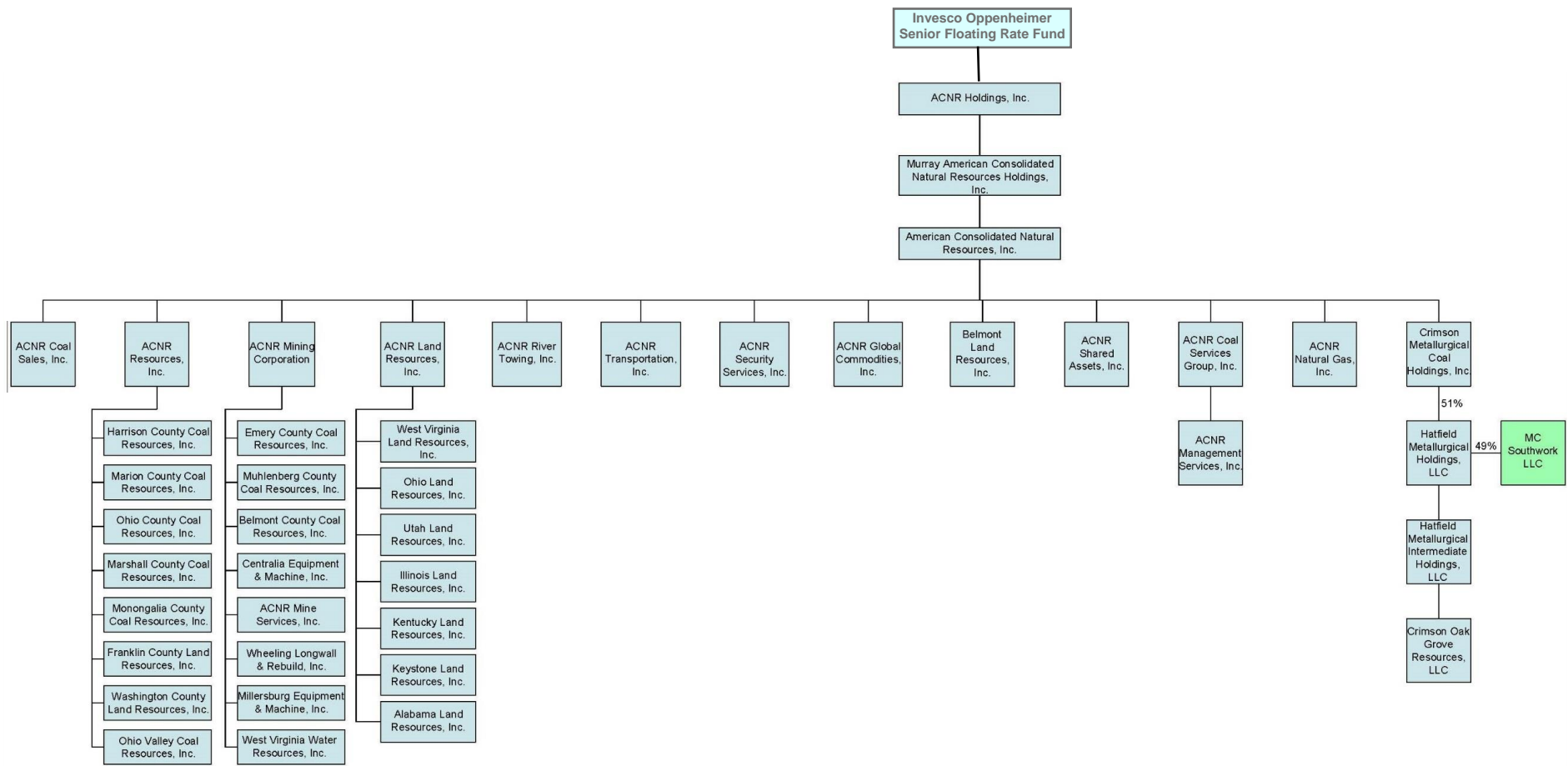


FIGURE 1-1. CORPORATE STRUCTURE.

