



GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

State of Utah

DEPARTMENT OF NATURAL RESOURCES

BRIAN C. STEED
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

July 8, 2019

Chris Hansen, Environmental Engineer
Canyon Fuel Company, LLC
HC 35 Box 380
Helper, Utah 84526

Subject: Five Year Permit Renewal, Gordon Creek Mine #2, #7 & #8, Canyon Fuel Company, LLC, C/007/0016, Task #5927

Dear Mr. Hansen:

The permit renewal for the Gordon Creek #2, #7 & #8 Mine is approved effective August 28, 2019. Enclosed are two (2) copies of the renewed permanent program permit. Please note the special condition attached.

Please have both permits signed by the designated signatory authority and return one signed copy to the Division.

If you have any questions, please call me or Steve Christensen at (801) 538-5350.

Sincerely,

John R. Baza
Director

JRB/SKC/sqs
Enclosures
O:\007016.GC2\PERMIT\2019\BazaLetter.doc



**UTAH DIVISION OF OIL, GAS AND MINING
STATE DECISION DOCUMENT**

**For
PERMIT RENEWAL**

**Canyon Fuel Company, LLC
Gordon Creek #2, #7 and #8 Mine
C/007/0016
Carbon County, Utah**

July 8, 2019

CONTENTS

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ADMINISTRATIVE OVERVIEW

Canyon Fuel Company, LLC
Gordon Creek #2, #7 and #8 Mine
C/007/0016
Carbon County, Utah

July 8, 2019

BACKGROUND

The Gordon Creek #2, #7 and #8 Mine is located approximately 20 miles northwest of Price, Utah. The initial permanent program permit was issued to Beaver Creek Coal Company on August 27, 1984 and was subsequently renewed on August 28, 1989. This mine was transferred from Beaver Creek Coal Company in 1991 to Mountain Coal Company, LLC and the permit was renewed on August 28, 1994, August 28, 1999, August 28, 2004, and again on August 28, 2009. On September 11, 2013, the permit was transferred from Mountain Coal Company, LLC to Canyon Fuel Company, LLC and was renewed on August 28, 2014.

The mine permanently closed in 1990. Reclamation started in 1995 and continued through November 26, 1998. The permit area was reduced from 2286 acres to 180 acres in 2001 due to the termination of federal leases. Phase I bond release was approved on October 9, 2003. Phase III bond release at the Sweet's Pond was also approved on October 9, 2003. Phase II Bond Release was approved in March 2007 and the sediment ponds were removed and reclaimed in October 2007.

PERMIT RENEWAL

The application for permit renewal was submitted on April 24, 2019, at least 120 days prior to the date of permit renewal. The renewal encompasses the same area approved in the last renewal and authorizes reclamation only. This renewal application was determined administratively completed on April 30, 2019. Public notice for the permit renewal was published in the ETV News on May 15, 22, 29 and June 5, 2019.

ANALYSIS

The permit renewal application was received at least 120 days prior to permit renewal. All notices were published as required. No comments were received.

RECOMMENDATION

Approval for this permit renewal is recommended with one condition concerning the electronic submittal of water quality data.

PERMITTING CHRONOLOGY

Canyon Fuel Company, LLC
Gordon Creek #2, #7 and #8 Mine
C/007/0016
Carbon County, Utah

July 8, 2019

April 24, 2019	Canyon Fuel Company, LLC submitted the permit renewal application.
April 30, 2019	Permit renewal application determined administratively complete.
April 30, 2019	Letter from Division to federal, state and local agencies to notify them about the permit renewal for the Gordon Creek #2, #7 and #8 Mine.
May 15, 22, 29 and June 5, 2019	Publication notice for permit renewal for the Gordon Creek #2, #7 and #8 Mine published in the ETV News.
July 5, 2019	No comments received.
July 8, 2019	Permit renewed effective August 28, 2019.

PERMIT RENEWAL FINDINGS

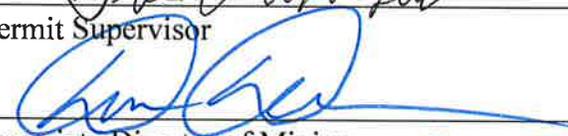
Canyon Fuel Company, LLC
Gordon Creek #2, #7 and #8 Mine
C/007/0016
Carbon County, Utah

July 7, 2014

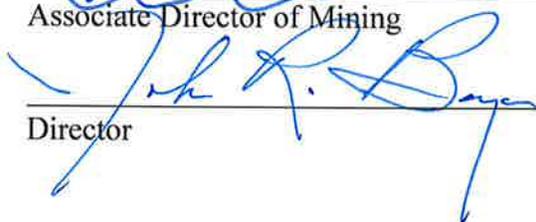
1. The permit renewal term will not exceed the original permit term of five years. (R645-303-324).
2. The terms and conditions of the existing permit are being met. (R645-303-233.110).
3. The reclamation operations are in compliance with the environmental protection standards of the Act and the Utah State Program. (R645-303-233.120).
4. The requested renewal will not substantially jeopardize the operator's continuing ability to comply with the Act and the Utah State. (R645-303-233.130).
5. The permittee has provided evidence of maintaining liability insurance (Great Midwest Insurance Company #GL00169760) (R645-303-233.140).
6. The permittee has posted a reclamation surety in the required amount and has provided evidence that the surety will remain in full effect for the permit period. (Lexon Insurance Company and Ironshore Indemnity Inc. #1093382 in the amount of \$171,000). (R645-303-233.150).



Permit Supervisor



Associate Director of Mining



Director

FEDERAL

PERMIT
C/007/0016

August 28, 2019

STATE OF UTAH
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING
1594 West North Temple, Suite 1210
Salt Lake City, Utah 84114-5801
(801) 538-5340

This permit, C/007/0016, is issued for the state of Utah by the Utah Division of Oil, Gas and Mining (DOGGM) to:

Canyon Fuel Company, LLC
9815 South Monroe St., Suite 203
Sandy, Utah 84070
(801) 695-9107

for the Gordon Creek #2, #7 and #8 Mines. A performance bond is filed with the DOGM in the amount of \$171,000.00, payable to the state of Utah, Division of Oil, Gas and Mining and the Office of Surface Mining. DOGM must receive a copy of this permit signed and dated by the permittee.

- Sec. 1: STATUTES AND REGULATIONS** - This permit is issued pursuant to the Utah Coal Mining and Reclamation Act of 1979, Utah Code Annotated (UCA) 40-10-1 et seq, hereafter referred to as the Act.
- Sec. 2: PERMIT AREA** - The permittee is authorized to conduct reclamation operations on following described lands within the permit area at the Gordon Creek #2, #7 and #8 Mines situated in the state of Utah, Carbon County, and located:

Township 13 South, Range 8 East, SLBM

Section 18: N1/2SE1/4, N1/2SW1/4SE1/4, S1/2NE1/4SW1/4, SE1/4SW1/4, SE1/4SW1/4SW1/4.

This legal description is for the permit area of the Gordon Creek #2, #7 and #8 Mines. The permittee is authorized to conduct reclamation activities on the foregoing described property subject to all applicable conditions, laws and regulations.

- Sec. 3: COMPLIANCE** - The permittee will comply with the terms and conditions of the permit, all applicable performance standards and requirements of the State Program.
- Sec. 4: PERMIT TERM** - This permit expires on August 28, 2024.

Sec. 5: ASSIGNMENT OF PERMIT RIGHTS - The permit rights may not be transferred, assigned or sold without the approval of the Director, DOGM. Transfer, assignment or sale of permit rights must be done in accordance with applicable regulations, including but not limited to 30 CFR 740.13(e) and R645-303.

Sec. 6: RIGHT OF ENTRY - The permittee shall allow the authorized representative of the DOGM, including but not limited to inspectors, and representatives of OSMRE, without advance notice or a search warrant, upon presentation of appropriate credentials, and without delay to:

- A. Have the rights of entry provided for in 30 CFR 840.12, R645-400-110, 30 CFR 842.13 and R645-400-220; and,
- B. Be accompanied by private persons for the purpose of conducting an inspection in accordance with R645-400-100 and 30 CFR 842, when the inspection is in response to an alleged violation reported by the private person.

Sec. 7: SCOPE OF OPERATIONS - The permittee shall conduct reclamation activities only on those lands specifically designated as within the permit area on the maps submitted in the mining and reclamation plan and permit application and approved for the term of the permit and which are subject to the performance bond.

Sec. 8: ENVIRONMENTAL IMPACTS - The permittee shall minimize any adverse impact to the environment or public health and safety through but not limited to:

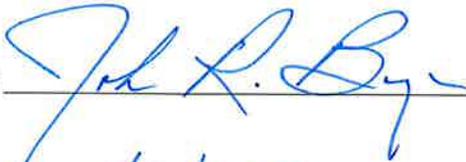
- A. Any accelerated monitoring to determine the nature and extent of noncompliance and the results of the noncompliance;
- B. Immediate implementation of measures necessary to comply; and
- C. Warning, as soon as possible after learning of such noncompliance, any person whose health and safety is in imminent danger due to the noncompliance.

Sec. 9: DISPOSAL OF POLLUTANTS - The permittee shall dispose of solids, sludge, filter backwash or pollutants in the course of treatment or control of waters or emissions to the air in the manner required by the approved Utah State Program and the Federal Lands Program which prevents violation of any applicable state or federal law.

- Sec.10: CONDUCT OF OPERATIONS** - The permittee shall conduct its operations:
- A. in accordance with the terms of the permit to prevent significant, imminent environmental harm to the health and safety of the public; and
 - B. utilizing methods specified as conditions of the permit by DOGM in approving alternative methods of compliance with the performance standards of the Act, the approved Utah State Program and the Federal Lands Program.
- Sec.11: EXISTING STRUCTURES** - As applicable, the permittee will comply with R645-301 and R645-302 for compliance, modification, or abandonment of existing structures.
- Sec.12: AUTHORIZED AGENT** - The permittee shall provide the names, addresses and telephone numbers of persons responsible for operations under the permit to whom notices and orders are to be delivered.
- Sec.13: COMPLIANCE WITH OTHER LAWS** - The permittee shall comply with the provisions of the Water Pollution Control Act (33 USC 1151 et seq.) and the Clean Air Act (42 USC 7401 et seq), UCA 26-11-1 et seq, and UCA 26-13-1 et seq.
- Sec.14: PERMIT RENEWAL** - Upon expiration, this permit may be renewed for areas within the boundaries of the existing permit in accordance with the Act, the approved Utah State Program and the Federal Lands Program.
- Sec.15: CULTURAL RESOURCES** - If during the course of mining operations, previously unidentified cultural resources are discovered, the permittee shall ensure that the site(s) is not disturbed and shall notify DOGM. DOGM, after coordination with OSMRE, shall inform the permittee of necessary actions required. The permittee shall implement the mitigation measures required by DOGM within the time frame specified by DOGM.
- Sec.16: APPEALS** - The permittee shall have the right to appeal as provided for under R645-300.
- Sec.17: SPECIAL CONDITIONS** - In addition to the general obligations and/or requirements set out in the leases and this permit, the permittee shall comply with the special conditions appended hereto as Attachment A.

The above conditions (Secs. 1-17) are also imposed upon the permittee's agents and employees. The failure or refusal of any of these persons to comply with these conditions shall be deemed a failure of the permittee to comply with the terms of this permit and the lease. The permittee shall require his agents, contractors and subcontractors involved in activities concerning this permit to include these conditions in the contracts between and among them. These conditions may be revised or amended, in writing, by the mutual consent of DOGM and the permittee at any time to adjust to changed conditions or to correct an oversight. DOGM may amend these conditions at any time without the consent of the permittee in order to make them consistent with any new federal or state statutes and any new regulations.

THE STATE OF UTAH

By: 
Date: 7/15/2019

I certify that I have read, understand and accept the requirements of this permit and any special conditions attached.

Authorized Representative of the Permittee

Date: _____

ATTACHMENT A
SPECIAL CONDITIONS

- 1) Canyon Fuel Company, LLC must submit water quality data for the Gordon Creek #2, #7 and #8 Mine in an electronic format through the Electronic Data Input web site, <http://linux1.ogm.utah.gov/cgi-bin/appx-ogm.cgi>

PROOF OF PUBLICATION AFFIDAVIT

I, Scottie Draper, being first duly sworn, state that I am the Publisher of ETV News, a weekly newspaper of general circulation published at Price, County of Carbon, State of Utah; and that the advertisement or notice, a printed copy of which is attached hereto, was printed and published in said newspaper for four issues and on www.utahlegals.com website as follows:

May 15, 2019

May 22, 2019

May 29, 2019

June 5, 2019

Scottie Draper
Scottie Draper, Editor

Subscribed to and sworn before me this 5th day of June, 2019.

Tanya Short
Notary Public



NOTICE OF PERMIT RENEWAL APPLICATION

Canyon Fuel Company, LLC, 9815 South Monroe St., Suite 203, Sandy, Utah 84070, has submitted for approval a five-year permit renewal application for the Gordon Creek No. 2, 7 and 8 Mines, which are located in the Bryner Canyon area of Carbon County, Utah. The permit area is described as follows: Township 13 South, Range 8 East, SLBM, Utah. Section 17: SE4SW4SW4. Section 18: N2SE4, N2SW4SE4, S2NE4SW4, SE4SW4, SE4SW4SW4. The Gordon Creek No. 2, 7 and 8 Mines are not operating and are in reclamation. Written comments, objections, or a request for an informal conference on this application for renewal should be directed to Utah Coal Program, Division of Oil, Gas and Mining, P.O. Box 145801, Salt Lake City, Utah 84114-5801. Comments must be submitted thirty (30) days from the date of the last publication of this notice. A copy of this application is available for public inspection at the Carbon County Courthouse in Price, Utah and the office of the Division of Oil, Gas and Mining, 1594 West North Temple, Suite 1210, Salt Lake City, Utah 84114-5801.

Published in the ETV Newspaper May 15, 22 and 29 and June 5, 2019.



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DEPARTMENT OF NATURAL RESOURCES

BRIAN C. STEED
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA
Division Director

July 3, 2019

TO: Internal File

FROM: Steve Christensen, Coal Program Manager *S. Christensen 7/8/19*

RE: Compliance Review for Section 510 (c) Findings – Gordon Creek #2, #7 & #8, Canyon Fuel Company, LLC, C/007/0016, Task #5927

As of the writing of this memo, there are no NOVS or COs which are not corrected or in the process of being corrected. There are no finalized Civil Penalties, which are outstanding and overdue in the name of Canyon Fuel Company, LLC. Canyon Fuel Company, LLC does not demonstrate a pattern of willful violations, nor have they been subject to any bond forfeitures for any operation in the state of Utah.

The recommendation from the Applicant Violator System (AVS) denotes that all connected entities either do not have any civil penalties or are under a settlement agreement (attached).

O:\007016.GC2\PERMIT\2019\510C.DOC

Application Evaluation

17 Violations Found.

Application Number: C0070016 SEQ:7
 Applicant Name: 142816 Canyon Fuel Company LLC
 Date Of Narrative: 7/3/2019 11:51:08 AM
 Requestor: suzannesteab@utah.gov

CAUTION: The Applicant/Violator System (AVS) is an informational database. Permit eligibility determinations are made by the regulatory authority with jurisdiction over the permit application not by the AVS. Results which display outstanding violations may not include critical information about settlements or other conditions that affect permit eligibility. Consult the AVS Office at 800-643-9748 for verification of information prior to making decisions on these results.

Violation Type	Violation Number	Violation Entities	Permit Number	Permitted State	Violation Status	Violation Date
1: Bond Forfeiture	2985329		2985329	KY	Outstanding	5/14/1987
		078176 Adkins & Webb Inc				
2: Bond Forfeiture	2985332		2985332	KY	Outstanding	8/19/1988
		108056 J & H Coal Co				
3: Bond Forfeiture	6985333		6985333	KY	Outstanding	1/16/1990
		108056 J & H Coal Co				
4: State Civil Penalty	053004		2985329	KY	Conditional	3/27/1986
		078176 Adkins & Webb Inc				
5: State Civil Penalty	053764		2985332	KY	Outstanding	9/18/1987
		108056 J & H Coal Co				
6: State Civil Penalty	054149		2985332	KY	Outstanding	3/28/1988
		108056 J & H Coal Co				
7: State Civil Penalty	054058		4985319	KY	Outstanding	11/20/1987
		034732 Price Coal Co				
8: State Civil Penalty	054148		4985319	KY	Outstanding	3/24/1988
		034732 Price Coal Co				
	054323		4985319	KY	Outstanding	6/15/1988

**9: State Civil
Penalty**

034732 Price Coal Co

**10: State Civil
Penalty**[053671](#)[4985319](#)

KY

Outstanding

5/22/1987

034732 Price Coal Co

**11: State Civil
Penalty**[054020](#)[4985319](#)

KY

Outstanding

4/26/1988

034732 Price Coal Co

**12: State Civil
Penalty**[053568](#)[6985333](#)

KY

Outstanding

6/5/1987

108056 J & H Coal Co

**13: State Civil
Penalty**[053757](#)[6985333](#)

KY

Outstanding

7/6/1987

108056 J & H Coal Co

**14: State Civil
Penalty**[053934](#)[6985333](#)

KY

Outstanding

10/2/1987

108056 J & H Coal Co

**15: State Civil
Penalty**[054316](#)[6985333](#)

KY

Outstanding

3/28/1988

108056 J & H Coal Co

**16: State Civil
Penalty**[054442](#)[6985333](#)

KY

Outstanding

6/15/1988

108056 J & H Coal Co

**17: State Civil
Penalty**[504587](#)[8985157](#)

KY

Outstanding

8/23/1988

007928 Past Coal Company Incorporated

Evaluation OFT

Entities: 68

260858 Trafigura Beheer B. V. - ()
 ---254577 Jeremy Charles Weir - (Chief Executive Officer)
 ---254577 Jeremy Charles Weir - (Director)
 ---260859 Michael Stuart Wainwright - (Chief Operations Officer)
 ---260859 Michael Stuart Wainwright - (Director)
 ---260860 Mark Joseph Irwin - (Director)
 ---260861 Jose Maria Larocca - (Director)
 ---260862 Sipko Nanne Schat - (Director)
 ---260863 Andrew Vickerman - (Director)
 ---260864 Mariano Marcondes Ferraz - (Director)
 ---260865 Trafigura Group PTE. LTD. - (Subsidiary Company)
 -----254577 Jeremy Charles Weir - (Director)
 -----260859 Michael Stuart Wainwright - (Director)
 -----260860 Mark Joseph Irwin - (Director)
 -----260861 Jose Maria Larocca - (Director)
 -----260862 Sipko Nanne Schat - (Director)

-----260863 Andrew Vickerman - (Director)
-----260866 Shu Shyan Seet - (Secretary)
-----260870 Pierre Andre Jacques Lorinet - (Director)
-----260871 Trafigura Holdings PTE. LTD - (Subsidiary Company)
-----260866 Shu Shyan Seet - (Secretary)
-----260870 Pierre Andre Jacques Lorinet - (Director)
-----260872 Matthus Pieter Spaans - (Director)
-----260873 Chin Hwee Tan - (Director)
-----260874 Martin Urdapilleta - (Director)
-----260875 Antonio Gerald Vieira Araujo - (Director)
-----260876 Trafigura Holdings Limited - (Subsidiary Company)
-----260860 Mark Joseph Irwin - (Director)
-----260877 Walter Cutajar - (Director)
-----260877 Walter Cutajar - (Secretary)
-----260878 Maryanne Inguanez - (Director)
-----260879 Robbert Alexander Maas - (Director)
-----260880 Galena Private Equity Investment LLC - (Subsidiary Company)
-----254576 Jesus Fernandez Lopez - (Director)
-----254577 Jeremy Charles Weir - (Director)
-----260859 Michael Stuart Wainwright - (Director)
-----260881 Gerard Sean Lynch - (Secretary)
-----260882 Galena Private Equity Resources Fund LP - (Subsidiary Company)
-----260900 Galena Private Equity Resources Investment LP - (Subsidiary Company)
-----260901 Galena Investments Limited - (Subsidiary Company)
-----254568 Galena US Holdings, Inc. - (Subsidiary Company)
-----260572 Corey Prologo - (Director)
-----260572 Corey Prologo - (President)
-----260573 Andy Smolenack - (Director)
-----261555 Wolverine Fuels LLC - (Subsidiary Company)
-----246813 James C Grech - (Chief Executive Officer)
-----246813 James C Grech - (Director)
-----254573 Brian Settles - (General Counsel)
-----254573 Brian Settles - (Secretary)
-----254573 Brian Settles - (Senior Vice President)
-----254620 Jesus Fernandez - (Director)
-----259469 Carlos Pons - (Director)
-----261547 Marc Maglione - (Chief Financial Officer)
-----261562 Wolverine Fuels Parent LLC - (Subsidiary Company)
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-----260899 Galena Private Equity Resources Co-Investment LP - (Subsidiary Company)
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-----260879 Robbert Alexander Maas - (Director)
---260912 Christophe Salmon - (Chief Financial Officer)
---260913 Christopher Cox - (Director)
260883 Galena Bulgaria Eood - ()
---260882 Galena Private Equity Resources Fund LP - (Subsidiary Company)
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---260884 Tzolo Iotov Voutov - (Director)
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-----260900 Galena Private Equity Resources Investment LP - (Subsidiary Company)
-----260901 Galena Investments Limited - (Subsidiary Company)
-----254568 Galena US Holdings, Inc. - (Subsidiary Company)
-----260572 Corey Prologo - (Director)
-----260572 Corey Prologo - (President)
-----260573 Andy Smolenack - (Director)
-----261555 Wolverine Fuels LLC - (Subsidiary Company)
-----246813 James C Grech - (Chief Executive Officer)
-----246813 James C Grech - (Director)
-----254573 Brian Settles - (General Counsel)
-----254573 Brian Settles - (Secretary)
-----254573 Brian Settles - (Senior Vice President)
-----254620 Jesus Fernandez - (Director)
-----259469 Carlos Pons - (Director)
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-----261547 Marc Maglione - (Chief Financial Officer)
-----261550 Wolverine Fuels Holding LLC - (Subsidiary Company)
-----142816 Canyon Fuel Company LLC - (Subsidiary Company)
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-----260877 Walter Cutajar - (Director)
-----260877 Walter Cutajar - (Secretary)
-----260878 Maryanne Inguanez - (Director)
-----260879 Robbert Alexander Maas - (Director)
---260886 Ileana Bolcato - (Director)
---260887 Fabrizio Riccardi - (Director)
---260888 Andrea Bonomi - (Director)
---260889 Francesco Cignolo - (Director)
---260890 Marius Van Heesch - (Director)
260891 University Of Texas System (UTIMCO) (Fund) - ()
---260882 Galena Private Equity Resources Fund LP - (Subsidiary Company)
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-----260877 Walter Cutajar - (Director)
-----260877 Walter Cutajar - (Secretary)
-----260878 Maryanne Inguanez - (Director)
-----260879 Robbert Alexander Maas - (Director)
--260892 T Britton Harris IV - (Chief Executive Officer)
--260892 T Britton Harris IV - (Corporate Officer)
--260892 T Britton Harris IV - (President)
--260893 Jeffery D Hildebrand - (Chairman of the Board)
--260894 Ray Rothrock - (Chairman of the Board)
--260895 Robert Gauntt - (Director)
--260896 Janet Handley - (Director)
--260897 Ray Nixon - (Director)
--260898 James C Weaver - (Director)
--260899 Galena Private Equity Resources Co-Investment LP - (Subsidiary Company)
-----260900 Galena Private Equity Resources Investment LP - (Subsidiary Company)
-----260901 Galena Investments Limited - (Subsidiary Company)
-----254568 Galena US Holdings, Inc. - (Subsidiary Company)
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-----260878 Maryanne Inguanez - (Director)
-----260879 Robbert Alexander Maas - (Director)
---260908 J Kyle Bass - (Director)
---260909 Phil Adams - (Director)
---260910 Robert Steven Hicks - (Director)
260904 Galena Private Equity Resources Limited - ()
---260881 Gerard Sean Lynch - (Director)
---260882 Galena Private Equity Resources Fund LP - (Subsidiary Company)
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---260899 Galena Private Equity Resources Co-Investment LP - (Subsidiary Company)
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-----260877 Walter Cutajar - (Secretary)
-----260878 Maryanne Inguanez - (Director)
-----260879 Robbert Alexander Maas - (Director)
--260905 Martin Byrne - (Director)
--260906 Sarah Ann Kelly - (Director)
--260907 Duncan Neil Letchford - (Director)
260916 Mousse Partners LTD - ()
--260911 Mousserena LP (Fund) - (Subsidiary Company)
-----260882 Galena Private Equity Resources Fund LP - (Subsidiary Company)
-----260900 Galena Private Equity Resources Investment LP - (Subsidiary Company)
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-----254573 Brian Settles - (Secretary)

- 254573 Brian Settles - (Senior Vice President)
- 261547 Marc Maglione - (Chief Financial Officer)
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- 260877 Walter Cutajar - (Secretary)
- 260878 Maryanne Inguanez - (Director)
- 260879 Robbert Alexander Maas - (Director)
- 260917 Charles Heilbronn - (Director)
- 260917 Charles Heilbronn - (President)
- 260917 Charles Heilbronn - (Shareholder)
- 260918 Ed Zysik - (Vice President)

Narrative

7/3/2019 - Violations 1-17 are under Island Creek settlement. Linking entity is James C Grech.