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C/007/033 Incoming
cc: Angela

#3593



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DENVER
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TUCSON

August 31, 2010

HAND DELIVERED

Mr. James D. Smith
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84520-0910

Re: Division Order -- Ownership and Control, ANDALEX Resources, Inc., Wildcat Loadout, Permit No. C/007/0033, Task ID No. 3533.

Dear Mr. Smith:

On behalf of ANDALEX Resources, Inc. ("ANDALEX"), the following responds to your August 23, 2010 letter citing deficiencies in ownership and control of the below referenced entities:

Murray Energy Corporation

- 1. As previously confirmed in the June 15, 2010 ownership and control listing provided by ANDALEX to the Division, the Begin Date for **Robert D. Moore, Executive Vice President and Chief Financial Officer**, is 08/01/2008 as shown on the AVS database ("AVS") should be updated accordingly.

UtahAmerican Energy, Inc.

- 1. This deficiency was previously corrected. **David W. Hibbs** is the current **President**, with a Begin Date of 12/11/2009, as set forth in the June 15, 2010 ownership and control list. A Secretary's Certificate was provided by ANDALEX for this matter in its June 2010 response and is once again attached.

Andalex Resources, Inc.

- 1. This deficiency was previously corrected. The June 15, 2010 listing correctly sets forth **David Hibbs'** Begin Date as **President** and **Director**. The AVS should be amended with this information. The Secretary's Certificate previously provided to the Division is once again attached.

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DIV. OF OIL, GAS & MINING

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2. This deficiency was previously corrected. The correct End Date for **P. Bruce Hill, President and CEO**, is 11/05/09 as indicated on the June 15, 2010 submittal. The Secretary's Certificate previously provided to the Division is once again attached.
3. This deficiency was previously corrected. The correct End Date for **Peter J. Vuljanic, Interim President**, is set forth in the June 15, 2010 submittal and should be changed in the AVS. The Secretary's Certificate previously provided to the Division is once again attached. Also enclosed is a copy of the November 6, 2009 resolution of the Directors acknowledging the untimely death of **P. Bruce Hill** as **President and CEO** and appointing **Peter J. Vuljanic** as **Interim President**.

AMCA Coal Leasing, Inc.

1. This deficiency was previously corrected. The correct Begin Date of 12/11/09 for **David W. Hibbs, President**, is indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.
2. This deficiency was previously corrected. The correct Begin and End Date for **Peter J. Vuljanic, Interim President**, is as indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. The Secretary's Certificate was previously provided to the Division and is once again attached.
3. This deficiency was previously corrected. The correct End Date for **P. Bruce Hill, Director**, is as indicated on the submittal and the AVE should be updated accordingly. The Secretary's Certificate was previously provided to the Division and is once again attached.

Andalex Resources Management, Inc.

1. This deficiency was previously corrected. The correct Begin Date for **David W. Hibbs, President**, is 12/11/2009, as indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.
2. This deficiency was previously corrected. The correct Begin and End Date for **Peter J. Vuljanic, Interim President**, as indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.

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3. This deficiency was previously corrected. The correct End Date for **P. Bruce Hill, President and CEO**, is 11/05/2009, as indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.
4. This deficiency was previously corrected. The correct End Date for **P. Bruce Hill, Director**, is 11/05/2009, as indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.
5. This deficiency was previously corrected. The current Begin Date for **Robert D. Moore, Treasurer**, and **Michael McKown, Secretary** is indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.

Genwal Resources, Inc.

1. This deficiency was previously corrected. The correct Begin Date for **David W. Hibbs, President**, is 12/11/2009, as indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.
2. This deficiency was previously corrected. The correct Begin and End Date for **Peter J. Vuljanic, Interim President**, is as indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.
3. This deficiency was previously corrected. The correct Begin and End Date for **P. Bruce Hill, President**, is 11/05/2009, as indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.
4. This deficiency was previously corrected. The Begin Date for **Robert D. Moore, Treasurer**, and **Michael O. McKown, Secretary**, is indeed 08/18/2006, as listed in the June 15, 2010 submittal and the AVS should be updated accordingly.
5. This is not a deficiency. Contrary to the Division's letter, the End Date of **Douglas H. Smith, Former Director**, is 12/16/2006, as indicated on the June 15, 2010 submittal and is consistent with the AVS.
6. The End Date for **John Bradshaw, VP**, of 05/17/2005 is correctly listed in the June 15, 2010 submittal and the AVS should be updated accordingly.

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West Ridge Resources, Inc.

1. This deficiency was previously corrected. The correct Begin Date for **David W. Hibbs, President**, is 12/11/2009, as indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.
2. This deficiency was previously corrected. The correct Begin and End Date for **Peter J. Vuljanic, Interim President**, is as indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.
3. This deficiency was previously corrected. The End Date of **P. Bruce Hill, CEO**, is 11/05/2009, as indicated on the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.
4. This deficiency was previously corrected. The correct Begin Date for **Robert D. Moore, Treasurer**, and **Michael O. McKown, Secretary**, is as identified in the June 15, 2010 submittal and the AVS should be updated accordingly. A Secretary's Certificate was previously provided to the Division and is once again attached.

AMCOAL Holdings, Inc.

1. As indicated on the June 15, 2010 submittal, the correct End Date of **P. Bruce Hill, Vice President**, is 10/03/09 and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.

The American Coal Sales Company

1. The AVS contains the correct End Date of 03/01/05 for **Edwin D. Lane, Vice President**. The ownership and control submittal has been amended to make this correction.
2. The AVS contains the correct End Date of **Duane A. Smith, Assistant Treasurer and Assistant Secretary**, as March 1, 2005. The ownership and control listing has been amended to make this correction.

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American Compliance Coal Inc.

1. The information regarding **Elmer A. Mottillo, Assistant Treasurer** provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.
2. The information regarding **Robert L. Putsock, Assistant Treasurer** provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.

American Energy Corporation

1. The information regarding **Robert L. Putsock, Assistant Treasurer** provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.

Anchor Longwall and Rebuild, Inc.

1. The information regarding **Duane A. Smith, Assistant Secretary**, provided in the June 15, 2010 submittal is correct and should be added to the AVS. A new Secretary's Certificate is enclosed.

Avonmore Rail Loading, Inc.

1. The information regarding **Elmer A. Mottillo, Assistant Secretary**, provided in the June 15, 2010 submittal is correct and should be added to the AVS. A new Secretary's Certificate is enclosed.
2. The information regarding **James R. Turner, Jr., Assistant Secretary**, provided in the June 15, 2010 submittal is correct and should be added to the AVS. A new Secretary's Certificate is enclosed.

Belmont Coal, Inc.

1. The information regarding **Robert E. Murray, Director**, provided in the June 15, 2010 submittal is correct and should be added to the AVS. A new Secretary's Certificate is enclosed.
2. The information regarding **Robert D. Moore, Director**, provided in the June 15, 2010 submittal is correct and should be added to the AVS. A new Secretary's Certificate is enclosed.

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Canterbury Coal Company

1. This deficiency was previously corrected. The correct Begin Date for **James R. Turner, Jr., Assistant Secretary**, is 06/01/08, as indicated on the June 15, 2010 submittal. A Secretary's Certificate was previously provided to the Division and is once again attached.

Coal Resources Holdings Co.

1. The information regarding **Robert E. Murray, President**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.
2. The information regarding **Michael D. Loiacono, Treasurer**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.
3. The information regarding **Michael O. McKown, Treasurer**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.

Coal Resources, Inc.

1. The information regarding **Michael D. Loaicano, Treasurer**, is corrected to show a Begin Date of April 8, 1996 and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.
2. The information regarding **Robert D. Moore, Sr. Vice President and CFO**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.
3. The information regarding **Michael O. McKown, Vice President, General Counsel and Secretary**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.
4. The information regarding **Christopher Van Bever, Assistant Secretary**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.

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5. The information regarding **Robert E. Murray, Shareholder**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.
6. The information regarding **Robert E. Murray, Director**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.
7. The information regarding **Henry W. Fayne, Director**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.
8. The information regarding **Richard L. Lawson, Director**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.
9. The information regarding **Andrew Weissman, Director**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.

Consolidated Land Company

1. The information regarding **Robert C. Putsock, Assistant Secretary**, has been corrected to show his appointment on 6/1/2008 and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.
2. The information regarding **Elmer A. Mottillo, Assistant Secretary**, has been corrected to show his End Date as 5/30/08. A new Secretary's Certificate is enclosed.

Energy Resources, Inc.

1. The information for **James R. Turner, Treasurer**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.
2. The information for **Charles E. Shestak, Assistant Secretary**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.

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Maple Creek Mining, Inc.

1. The information for **Robert E. Murray, Director**, provided in the June 15, 2010 submittal is correct and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.

Monvalley Transportation Center, Inc.

1. AVS shows the correct Begin Date of 08/28/95 for **Robert E. Murray, Director**. The ownership and control listing will be corrected to address this typographical error.

OhioAmerican Energy Incorporated

1. The information provided for **Mark D. Nelson, Vice President**, has been corrected to show an End Date of 7/15/09 as set forth in the AVS.
2. The information provided for **Elmer A. Mottillo, Vice President**, has been corrected to show an End Date of 5/30/08 as set forth in the AVS.
3. The information provided for **Charles Kemp, Vice President**, has been corrected to show an End Date of 7/15/09 as set forth in the AVS.

Oneida Coal Company, Inc.

1. AVS shows the correct Begin Date of 02/28/92 for **Robert E. Murray, Director**.

PennAmerican Coal, Inc.

1. AVS correctly shows **P. Bruce Hill, President**, with a Begin Date of 06/25/01. The ownership and control submittal has been corrected to add this information.
2. As indicated on the June 15, 2010 submittal, **Robert D. Moore** is the **President** with a Begin Date of 08/28/07 and the AVS should be updated accordingly. A new Secretary's Certificate is enclosed.

Pennsylvania Transloading, Inc.

1. The Begin Date of April 28, 2010 for **Paul B. Piccolini, President**, is correct. **Mr. Piccolini's** End Date as **President** was September 11, 2008. This information has been corrected and a new Secretary's Certificate is enclosed.

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Pinski Corp.

1. **Bruce Hill** passed away on November 5, 2009. The position of **President** is currently vacant.

Spring Church Coal Company

1. The submittal has been corrected to show that **P. Bruce Hill** was **President** with a Begin Date of 06/25/01 and an End Date of 07/16/07. **Robert D. Moore** is the **President** with a Begin Date of 05/26/07.
2. **Robert D. Moore** is correctly shown as **Secretary/Treasurer** with a Begin Date of 6/25/01. **Michael O. McKown** is the **Secretary**, as listed on the submittal, with a Begin Date of 05/26/07.
3. **Elmer Mottillo** was **Assistant Secretary** from 01/02/03 to 05/30/08. **James R. Turner, Jr.**, is the **Assistant Secretary**, as listed on the submittal, with a Begin Date of 06/01/08.

TDK Coal Sales, Incorporated

1. **James R. Turner, Jr., Treasurer**, is correctly listed on the June 15, 2010 submittal, with a Begin Date of 06/01/08. The AVS should be updated accordingly.

West Virginia Resources, Inc.

1. The AVS shows the correct Begin Date of 10/02/06 for **Charles Shestak, Vice President**. The corrected information is enclosed.

Murray American Energy, Inc.

1. The information listing for **Murray American Energy, Inc.** in the June 15, 2010 submission is correct and should be added to the AVS.

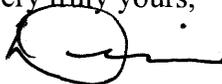
WyAmerican Energy, Inc.

1. The name **WyAmerican Energy, Inc.** was changed to **Murray American Energy, Inc.** and the AVS should be updated accordingly.

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Thank you for your assistance with this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Denise A. Dragoo". The signature is written in a cursive style with a large, circular initial "D" and a horizontal line extending to the right.

Denise A. Dragoo

DAD:jmc

Enclosures

Cc: David B. Hibbs
David Shaver
Michael McKown, Esq.