



GARY R. HERBERT  
Governor

SPENCER J. COX  
Lieutenant Governor

# State of Utah

DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER  
Executive Director

Division of Oil, Gas and Mining

JOHN R. BAZA  
Division Director

April 6, 2016

TO: Internal File

FROM: Daron R. Haddock, Permit Supervisor 

RE: Compliance Review for Section 510 (c) Findings, Bronco Utah Operations, LLC

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 Bronco Utah Operations, LLC. Bronco Utah Operations, 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).

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## Entity Evaluation

Entity Number 256596  
 Entity Name Bronco Utah Operations LLC  
 Date Of Narrative 4/6/2016 11:45:35 AM  
 Requestor suzanne.steab

**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.

### 18 Violations Found.

<b>1: Bond Forfeiture</b>	<u><a href="#">2985329</a></u>	KY	Permit:2985329	Outstanding	5/14/1987
Violator 1:	078176 Adkins & Webb Inc				
<b>2: State Civil Penalty</b>	<u><a href="#">053004</a></u>	KY	Permit:2985329	Outstanding	3/27/1986
Violator 1:	078176 Adkins & Webb Inc				
<b>3: Bond Forfeiture</b>	<u><a href="#">2985332</a></u>	KY	Permit:2985332	Outstanding	8/19/1988
Violator 1:	108056 J & H Coal Co				
<b>4: State Civil Penalty</b>	<u><a href="#">053764</a></u>	KY	Permit:2985332	Outstanding	9/18/1987
Violator 1:	108056 J & H Coal Co				
<b>5: State Civil Penalty</b>	<u><a href="#">054149</a></u>	KY	Permit:2985332	Outstanding	3/28/1988
Violator 1:	108056 J & H Coal Co				
<b>6: Bond Forfeiture</b>	<u><a href="#">4985319</a></u>	KY	Permit:4985319	Outstanding	1/20/1989
Violator 1:	034732 Price Coal Co				
<b>7: State Civil Penalty</b>	<u><a href="#">053671</a></u>	KY	Permit:4985319	Outstanding	5/22/1987
Violator 1:	034732 Price Coal Co				
<b>8: State Civil Penalty</b>	<u><a href="#">054020</a></u>	KY	Permit:4985319	Outstanding	4/26/1988
Violator 1:	034732 Price Coal Co				
<b>9: State Civil Penalty</b>	<u><a href="#">054058</a></u>	KY	Permit:4985319	Outstanding	11/20/1987
Violator 1:	034732 Price Coal Co				
<b>10: State Civil Penalty</b>	<u><a href="#">054148</a></u>	KY	Permit:4985319	Outstanding	3/24/1988
Violator 1:	034732 Price Coal Co				
<b>11: State Civil Penalty</b>	<u><a href="#">054323</a></u>	KY	Permit:4985319	Outstanding	6/15/1988
Violator 1:	034732 Price Coal Co				
<b>12: Bond Forfeiture</b>	<u><a href="#">6985333</a></u>	KY	Permit:6985333	Outstanding	1/16/1990
Violator 1:	108056 J & H Coal Co				
<b>13: State Civil Penalty</b>	<u><a href="#">053568</a></u>	KY	Permit:6985333	Outstanding	6/5/1987
Violator 1:	108056 J & H Coal Co				
<b>14: State Civil Penalty</b>	<u><a href="#">053757</a></u>	KY	Permit:6985333	Outstanding	7/6/1987
Violator 1:	108056 J & H Coal Co				
<b>15: State Civil Penalty</b>	<u><a href="#">053934</a></u>	KY	Permit:6985333	Outstanding	10/2/1987
Violator 1:	108056 J & H Coal Co				
<b>16: State Civil Penalty</b>	<u><a href="#">054316</a></u>	KY	Permit:6985333	Outstanding	3/28/1988
Violator 1:	108056 J & H Coal Co				
<b>17: State Civil Penalty</b>	<u><a href="#">054442</a></u>	KY	Permit:6985333	Outstanding	6/15/1988
Violator 1:	108056 J & H Coal Co				
<b>18: State Civil Penalty</b>	<u><a href="#">504587</a></u>	KY	Permit:8985157	Outstanding	8/23/1988
Violator 1:	007928 Past Coal Company Incorporated				

## Evaluation OFT

Entities: 15

256582 Sandton Fund Advisors, LLC - ()  
 ---256583 Rael Nurick - (Manager)  
 ---256584 Thomas Wood - (Manager)  
 ---256587 Sandton Credit Solutions III GP, LLC - (Subsidiary Company)  
 -----256583 Rael Nurick - (Member)  
 -----256584 Thomas Wood - (Member)  
 -----256585 Sandton Credit Solutions Off-Shore III, LP - (Subsidiary Company)  
 -----256583 Rael Nurick - (Member)  
 -----256584 Thomas Wood - (Member)  
 -----256586 Sandton Credit Solutions Fund III Subsidiary VIII, LLC - (Subsidiary Company)  
 -----256583 Rael Nurick - (Member)  
 -----256584 Thomas Wood - (Member)  
 -----256589 Sandton Credit Solutions Cayman Fund III, LP - (Subsidiary Company)  
 -----256583 Rael Nurick - (Member)  
 -----256584 Thomas Wood - (Member)  
 -----256590 Sandton Credit Solutions Master Fund III, LP - (Subsidiary Company)  
 -----256583 Rael Nurick - (Member)  
 -----256584 Thomas Wood - (Member)  
 -----256591 Sandton Fund III Holdings III, LLC - (Subsidiary Company)  
 -----256583 Rael Nurick - (Member)  
 -----256584 Thomas Wood - (Member)  
 -----256592 Bronco Coal Resources LLC - (Subsidiary Company)  
 -----118472 Dan R Baker - (Chief Executive Officer)  
 -----118472 Dan R Baker - (President)  
 -----256593 Gary Takenaka - (Chief Operations Officer)  
 -----256593 Gary Takenaka - (Secretary)  
 -----256593 Gary Takenaka - (Treasurer)  
 -----256596 Bronco Utah Operations LLC - (Subsidiary Company)  
 -----118472 Dan R Baker - (Chief Executive Officer)  
 -----118472 Dan R Baker - (President)  
 -----256593 Gary Takenaka - (Chief Operations Officer)  
 -----256593 Gary Takenaka - (Secretary)  
 -----256593 Gary Takenaka - (Treasurer)  
 -----257895 David Petty - (Chief Financial Officer)  
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 -----257895 David Petty - (Chief Financial Officer)  
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 -----256589 Sandton Credit Solutions Cayman Fund III, LP - (Subsidiary Company)  
 -----256583 Rael Nurick - (Member)  
 -----256584 Thomas Wood - (Member)  
 -----256590 Sandton Credit Solutions Master Fund III, LP - (Subsidiary Company)  
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 -----256593 Gary Takenaka - (Treasurer)  
 -----257895 David Petty - (Chief Financial Officer)  
 -----257895 David Petty - (Chief Financial Officer)  
 -----256588 Sandton Credit Solutions Onshore Fund III, LP - (Subsidiary Company)  
 -----256583 Rael Nurick - (Member)  
 -----256584 Thomas Wood - (Member)

- 256590 Sandton Credit Solutions Master Fund III, LP - (Subsidiary Company)
- 256583 Rael Nurick - (Member)
- 256584 Thomas Wood - (Member)
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**Narrative**

4/6/2016 - Violations 1-18 are under Island Creek settlement. Linking entity is Dan R Baker. DB