
BEFORE THE UTAH STATE TAX COMMISSION

FRONTIER ASPEN, LLC,

Petitioner,

v.

PROPERTY TAX DIVISION OF THE
UTAH STATE TAX COMMISSION,

Respondent,

SUMMIT COUNTY,

Cross-Petitioner.

ORDER OF APPROVAL

Appeal Nos. 18-1425 & 19-1632

Account No. 14522746-002-PCA

Tax Type: Property Tax / Centrally Assessed

Tax Years: 2018 & 2019

Judge: Chapman

STATEMENT OF THE CASE

These matters came before the Utah State Tax Commission on Petitioner's appeal of the property tax assessments on the subject property. Petitioner and Respondent have agreed that an adjustment to the valuation is necessary and proper for each of the tax years at issue. After making the adjustment, the Stipulated System Value for the 2018 & 2019 tax years is \$120,000,000. For the 2018 tax year, the Original Assessed Utah Value of \$24,058,400 has been stipulated to \$24,888,000. For the 2019 tax year, the Original Assessed Utah Value of \$25,907,200 has been stipulated to \$24,288,000.

Each affected county had standing to object to the assessment of the subject property pursuant to Utah Code Ann. §59-2-1007, but elected not to do so.

ORDER

Based on the foregoing, the Utah State Tax Commission hereby finds the Utah Value of the subject property for the tax year 2018 is \$24,888,000 and for the 2019 tax year is \$24,288,000.

The Property Tax Division has calculated final adjustments to the values apportioned to each affected tax district resulting from this order. The attached copy of that information is made part of this order by this reference. County officials are to use the information provided to adjust their tax rolls in accordance with the revised assessment and to calculate refunds as appropriate.

Appeal Nos. 18-1425 & 19-1632

BY ORDER OF THE COMMISSION:

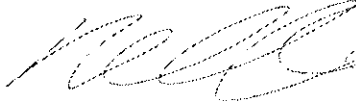
DATED this 8 day of June, 2020.



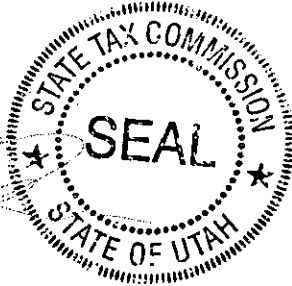
John L. Valentine
Commission Chair



Michael J. Cragun
Commissioner



Rebecca L. Rockwell
Commissioner



Lawrence C. Walters
Commissioner

NOTICE: An order approving a stipulated agreement constitutes final agency action subject to judicial review pursuant to Utah Code Ann. §§59-1-601 and 63-46b-13 et.seq. Any action to enforce the agreement may be brought pursuant to Utah Code Ann. §63-46b-19.

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Attorneys for Property Tax Division of the Utah State Tax Commission

BEFORE THE UTAH STATE TAX COMMISSION

<p>FRONTIER ASPEN LLC,</p> <p style="text-align: center;">Petitioner,</p> <p style="text-align: center;">vs.</p> <p>PROPERTY TAX DIVISION OF THE UTAH STATE TAX COMMISSION,</p> <p style="text-align: center;">Respondent.</p>	<p>AMENDED STIPULATION</p> <p>Appeal Nos. 18-1425 and 19-1632</p> <p>Account No. 14522746-002-PCA</p> <p>Tax Type: Centrally Assessed Property</p>
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STIPULATION

The parties in the above-captioned appeals, Frontier Aspen, LLC (“Frontier Aspen”) and the Property Tax Division of the Utah State Tax Commission (the “Division”) for property tax year 2019, by and through their respective representatives, hereby stipulate to a resolution and settlement of the above-captioned appeals as follows:

1. This Stipulation and Settlement Agreement concerns Frontier Aspen’s 2018 and

2019 property tax appeals;

2. The parties have discussed and considered their respective positions concerning the assessed values determined by the Division for property tax years 2018 and 2019 and recognize the considerable costs and risks inherent in the potential litigation of these matters;

3. The parties mutually desire to avoid these costs and risks and fully settle and resolve Frontier Aspen’s appeal for the 2018 and 2019 property tax years, without further litigation, in a fair, reasonable and economic fashion;

4. The parties agree to resolve and settle the above-captioned appeal by stipulating to the following “Stipulated Taxable Values”:

<u>Tax Year</u>	<u>Original Assessed System Values</u>	<u>Stipulated System Values</u>
2018	\$116,000,000	\$120,000,000
2019	\$128,000,000	\$120,000,000

4. The impact of the proposed change to the assessed values is set forth in the County Breakout Reports for 2018 and 2019 attached as Exhibits “A” and “B” respectively and summarized below:

<u>Tax Year</u>	<u>Original Assessed Utah Values</u>	<u>Stipulated Utah Values</u>
2018	\$24,058,400	\$24,888,000
2019	\$25,907,200	\$24,288,000

5. The parties further stipulate that the “Stipulated Taxable Values” fall within a reasonable range of fair market of Frontier Aspen’s taxable property under Utah law for the respective property tax years at issue;

6. The parties understand that this Stipulation is subject to approval by the Utah State Tax Commission and an opportunity to respond by the counties who are not parties to this Stipulation and shall become final and conclusive between the parties and impacted counties upon approval by the Utah State Tax Commission, as evidenced by a written order executed by the Tax Commissioners;

7. Should the Tax Commission decline to approve this Stipulation, it shall be null and void and shall not be admissible as evidence against any party in any future proceedings;

8. The parties further stipulate that Frontier Aspen’s above captioned 2018 and 2019 Utah property tax appeals shall be dismissed when the Tax Commission’s Order of Approval becomes final;

9. This Stipulation shall be binding on the parties and shall constitute full resolution of Frontier Aspen's appeals.

STIPULATED this 24th day of April, 2020 by:

FRONTIER ASPEN, LLC

PROPERTY TAX DIVISION

/s/ Leslie Simmons/Blynda Langford

/s/ Laron J. Lind

Leslie Simmons
Holly Frontier Corporation, and
Blynda Langford
Industrial Valuation Services

Laron Lind
Michelle A. Lombardi
Assistant Utah Attorneys General
Attorneys for the Property Tax Division

EXHIBIT A



Utah State Tax Commission
Property Tax Division - Centrally Assessed
2018 Revised Notice of Valuation
County Breakout Report

Taxpayer: FRONTIER ASPEN LLC
Appeal Number: 18-1425 & 18-1425

Taxpayer Number: 14522746-002-PCA
Industry: Liquid Pipeline

County	Tax Area	Original Valuation	Revised Valuation	Change in Valuation
Summit				
	037-0000	\$24,058,400	\$24,888,000	\$829,600
Summit County Total		\$24,058,400	\$24,888,000	\$829,600
TOTAL VALUE		\$24,058,400	\$24,888,000	\$829,600

EXHIBIT B



Utah State Tax Commission
Property Tax Division - Centrally Assessed
2019 Revised Notice of Valuation
County Breakout Report

Taxpayer: FRONTIER ASPEN LLC
Appeal Number: 19-1632 & 19-1632

Taxpayer Number: 14522746-002-PCA
Industry: Liquid Pipeline

County	Tax Area	Original Valuation	Revised Valuation	Change in Valuation
Summit				
	037-0000	\$25,907,200	\$24,288,000	-\$1,619,200
Summit County Total		\$25,907,200	\$24,288,000	-\$1,619,200
TOTAL VALUE		\$25,907,200	\$24,288,000	-\$1,619,200

Utah State Tax Commission
USTC - Appeal
Certificate of Mailing

Summit County Auditor vs Property Tax Division

18-1425

Property Tax Division
210 North 1950 West
Salt Lake City, UT 84134

Respondent

Laron J. Lind
160 East 300 South, 5th Floor
Salt Lake City, UT 84114

Attorney for Respondent

Michelle A. Alig Lombardi
160 East 300 South, 5th Floor
Salt Lake City, UT 84114-0874

Attorney for Respondent

Summit County Auditor
PO Box 128
Coalville, UT 84017

Affected County / Petitioner

Adam Ward
PO Box 92108
Austin, TX 78709

Representative

Frontier Aspen LLC
Attn: Leslie Simmons
2828 N Harwood Ste 1300
Dallas, TX 75201

Petitioner

******CERTIFICATION******

I certify on this date I mailed a copy of the foregoing document addressed to each of the above named parties.



June 8, 2020

Date

Signature

Certificate of Mailing

Frontier Aspen LLC vs Property Tax Division

19-1632

Property Tax Division
210 North 1950 West
Salt Lake City, UT 84134

Respondent

Laron J. Lind
160 East 300 South, 5th Floor
Salt Lake City, UT 84114

Attorney for Respondent

Michelle A. Alig Lombardi
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Salt Lake City, UT 84114-0874

Attorney for Respondent

Summit County Auditor
PO Box 128
Coalville, UT 84017

Affected County

Frontier Aspen LLC
Attn: Leslie Simmons
2828 N Harwood Ste 1300
Dallas, TX 75201

Petitioner

Blynda Langford
PO Box 92108
Austin, TX 78709

Representative

******CERTIFICATION******

I certify on this date I mailed a copy of the foregoing document addressed to each of the above named parties.



June 8, 2020

Date

Signature
