
BEFORE THE UTAH STATE TAX COMMISSION

TABLE ROCK MINERALS,

Petitioner,

v.

PROPERTY TAX DIVISION OF THE
UTAH STATE TAX COMMISSION,

Respondent.

ORDER OF APPROVAL

Appeal No. 21-1394

Account No: 14282538-006-PCA

Tax Type: Property Tax/Centrally Assessed

Tax Year: 2021

Judge: Halverson

STATEMENT OF THE CASE

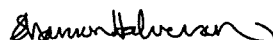
This matter came before the Utah State Tax Commission on Petitioner's appeal of the property tax assessment on the subject property. Petitioner and Respondent have agreed that an adjustment to Respondent's initial valuation from \$10,436,861 to \$3,258,275 for the 2021 tax year is necessary.

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 market value of the subject property for the tax year 2021 is \$3,258,275.

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.

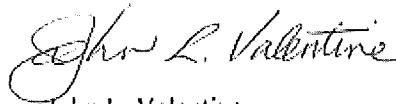


Shannon Halverson
Administrative Law Judge

Appeal No. 21-1394

BY ORDER OF THE COMMISSION:

DATED this 6th day of October, 2022.



John L. Valentine
Commission Chair

EXCUSED

Rebecca L. Rockwell
Commissioner



Michael J. Cragin
Commissioner



Jennifer N. Fresques
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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BEFORE THE UTAH STATE TAX COMMISSION

<p>TABLE ROCK MINERALS,</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>STIPULATION</p> <p>Appeal No. 21-1394</p> <p>Account No. 14282538-006-PCA</p> <p>Tax Type: Centrally Assessed Property</p>
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Table Rock Minerals (“Table Rock”), Uintah County, and the Property Tax Division of the Utah State Tax Commission (“Division”) stipulate as follows:

1. This Stipulation is entered into by and between the Division, Table Rock, and Uintah County concerning Table Rock’s 2021 property tax appeal and Uintah County’s 2021 cross appeal.

2. The parties have discussed and considered their respective positions concerning the assessed value determined by the Division for the 2021 property tax year and recognize the considerable costs and risks inherent in potential litigation.

3. The parties mutually desire to avoid these costs and risks and fully settle and resolve Table Rock's appeal and the county's cross appeal for the 2021 property tax year, 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 Value of Table Rock's Utah property:

TAX YEAR	ORIGINAL ASSESSMENT	STIPULATED TAXABLE VALUE
2021	\$10,436,861	\$3,258,275

5. The impact of the proposed change to the assessed value is set forth in the County Breakout Report attached as Exhibit A.

6. The parties further stipulate that the Stipulated Taxable Value for 2021 falls within a reasonable range of fair market for Table Rock's taxable property under Utah law for the property tax year at issue.

7. During the course of the appeal, the Division discovered previously untaxed escaped property in tax years 2019 and 2020 ("Escaped Property"). The value of the 2019 Escaped Property is \$1,624,717 and the value of the 2020 Escaped Property is \$1,687,646. Assessments for this Escaped Property were issued September 6, 2022. As part of this Stipulation, the parties stipulate that the Escaped Property values are correct and fall within a reasonable range of fair market value.

8. Upon issuance of a Commission order approving this Stipulation, any counties that have signed the stipulation agree to use the apportionment in Exhibit A to revise their assessment rolls and then timely issue tax bills based on any increase in taxable value or refund

any taxes that may have been collected on taxable value in excess of the Stipulated Taxable Value.

9. The appraisal methods applied in this Stipulation pertain to the lien date listed above only and the use of such methods cannot be used as evidence or as an admission against any party in another lien date or matter.

10. The parties understand that this Stipulation is subject to approval by the Utah State Tax Commission and shall become final and conclusive between the parties upon approval by the Tax Commission, as evidenced by a written order executed by the Tax Commission.


11. 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.

12. The parties further stipulate that Table Rock's above-captioned Utah property tax appeal and the county's cross appeal shall be dismissed when the Tax Commission's order approving this Stipulation becomes final.

OCTOBER


STIPULATED this 3RD day of September, 2022 by:

TABLE ROCK MINERALS




/s/ Jim Liskas
9/27/2022
Jim Liskas
Managing Partner
Table Rock Minerals

PROPERTY TAX DIVISION



/s/ Joshua R. Nelson
Michelle A. Lombardi
Assistant Utah Attorneys General
Attorneys for Property Tax Division

UINTAH COUNTY



/s/ Jennifer Mastroiocco
Jennifer Mastroiocco
Goebel Anderson PC
Attorney for Uintah County

EXHIBIT A



Utah State Tax Commission
Property Tax Division - Centrally Assessed
2021 Revised Notice of Valuation
County Breakout Report

Taxpayer: TABLE ROCK MINERALS LLC

Taxpayer Number: 14282538-006-PCA

Appeal Number: 21-1394 & 21-1394

Industry: Non-Metalliferous Mining

County	Tax Area	Original Valuation	Revised Valuation	Change in Valuation
Uintah				
	001-0000	\$10,436,861	\$1,599,117	-\$8,837,744
	007-0000	\$0	\$1,659,158	\$1,659,158
Uintah County Total		\$10,436,861	\$3,258,275	-\$7,178,586
TOTAL VALUE		\$10,436,861	\$3,258,275	-\$7,178,586

USTC – Appeal
Certificate of Mailing
Utah State Tax Commission

**Uintah County Auditor, Table Rock Minerals (Petitioner) vs
Property Tax Division (Respondent)**

21-1394

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Ste 200
Salt Lake City, UT 84111

Attorney for Petitioner

Property Tax Division
Sent via Email

Respondent

Table Rock Minerals
P.O. Box 1530
Vernal, UT 84078

Petitioner

**** CERTIFICATION ****

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

Jeanell Collings

October 6th, 2022

Erin H. Jones

Date

Signature

