#### IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

Chapter 11 In re

SANTA FE GOLD CORPORATION, et al., Case No. 15-11761 (MFW)

Debtors.<sup>1</sup> **Joint Administration Requested** 

#### NOTICE OF FILING DEBTORS' AMENDED LIST OF CREDITORS HOLDING TWENTY LARGEST UNSECURED CLAIMS ON A CONSOLIDATED BASIS

PLEASE TAKE NOTICE that on the date hereof, the above-captioned debtors and debtors in possession (collectively, the "Debtors") each filed a voluntary petition in the United States Bankruptcy Court for the District of Delaware for relief under chapter 11 of title 11 of the United States Code. As part of the petition, the Debtors included the Debtors' list of creditors holding the twenty largest unsecured claims on a consolidated basis (the "Top 20 List").

PLEASE TAKE FURTHER NOTICE that attached as Exhibit A hereto is an amended version of the Top 20 List (the "Amended Top 20 List") and the accompanying declaration.

Dated: August 26, 2015 Wilmington, Delaware YOUNG CONAWAY STARGATT & TAYLOR, LLP

#### /s/ Ian J. Bambrick

Robert S. Brady (No. 2847) Edmon L. Morton (No. 3856) Kenneth J. Enos (No. 4544) Ian J. Bambrick (No. 5455) 1000 N. King Street Rodney Square Wilmington, Delaware 19801 Telephone: (302) 571-6600

Facsimile: (302) 571-1253

Proposed Counsel to the Debtors and Debtors in Possession

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Santa Fe Gold Corporation (4315); Azco Mica, Inc. (8577); The Lordsburg Mining Company (4474); and Santa Fe Gold (Barbados) Corporation (N/A). The Debtors' mailing address is 1219 Banner Mine Road, Lordsburg, New Mexico 88045.

### Exhibit A

**Amended Top 20 List** 

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In re	: Ch	apter 11
SANTA FE GOLD CORPORATION, et al.,	: Cas	se No. 15-11761 (MFW)
Debtors. <sup>1</sup>	: : Joi	nt Administration Requested
	: <b>v</b>	
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# DEBTORS' AMENDED LIST OF CREDITORS HOLDING TWENTY LARGEST UNSECURED CLAIMS ON A CONSOLIDATED BASIS

The above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") each filed a voluntary petition in the Court for relief under chapter 11 of title 11 of the United States Code. This amended list of creditors holding the twenty (20) largest unsecured claims (the "<u>Amended Top 20 List</u>") against the Debtors, on a consolidated basis, has been prepared from the Debtors' books and records as of August 24, 2015.

The Amended Top 20 List was prepared in accordance with Rule 1007(d) of the Federal Rules of Bankruptcy Procedure for filing in the Debtors' chapter 11 cases. The Amended Top 20 List does not include (1) persons who come within the definition of an "insider" set forth in 11 U.S.C. § 101(31) or (2) secured creditors, unless the value of the collateral is such that the unsecured deficiency places the creditor among the holders of the twenty (20) largest unsecured claims, on a consolidated basis.

The information presented in the Amended Top 20 List shall not constitute an admission by, nor is it binding on, the Debtors. The information presented herein, including, without limitation, the Debtors' failure to list any claim as contingent, unliquidated, disputed, or subject to a setoff, does not constitute an admission by the Debtors nor does it constitute a waiver of the Debtors' rights to contest the validity, priority, nature, characterization, and/or amount of any claim.<sup>2</sup>

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Santa Fe Gold Corporation (4315); Azco Mica, Inc. (8577); The Lordsburg Mining Company (4474); and Santa Fe Gold (Barbados) Corporation (N/A). The Debtors' mailing address is 1219 Banner Mine Road, Lordsburg, New Mexico 88045.

Certain claims listed herein may be subject to offset, discount, trade credit, or other deductions, which may not be included in the amounts set forth herein. Failure to include such amount in this list shall not constitute a waiver of such right.

Rank	NAME OF CREDITOR	Telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted	Nature of claim (trade debt, bank loan, government contract, etc.)	Indicate if claim is contingent, unliquidated, disputed or subject to setoff <sup>3</sup>	Amount of claim
1.	International Goldfields Limited	Level 2, 1 Altona Street WEST PERTH WA 6005 Phone: +61 8 9388 0944 Fax: +61 8 9388 0933 E-mail: info@intgold.com.au	Loan		\$3,880,924.78
2.	Tyhee Gold Corp.	Tyhee Gold Corp. Suite 401 - 675 West Hastings Street Vancouver, British Columbia V6B 1N2 Canada Attention: Denis M. Taschuk, Chairman Phone: 604-681-2877 Fax: 604-681-2879 E-mail: info@tyhee.com	Loan	Disputed and subject to setoff	\$2,315,078.00
3.	Rocky Mountain Transportation, Inc.	PO Box 1099 Deming, NM 88031 Phone: 575-546-0568 Fax: 575-546-2973 E-mail: cwadell@hughes.net	Trade debt		\$583,337.13
4.	Summit Minerals, Inc.	320 Gold Ave. SW, Suite 1000 Albuquerque, NM 87102 Phone: 505-883-6250 Fax: 505-884-3424 E-mail: pdomenici@domenicilaw.com	Royalties	Disputed and subject to setoff	\$519,262.27
5.	The Jordaan Law Firm, PLLC	1750 30th Street, Suite 501 Boulder, CO 80301 Phone: 214-202-7449 Fax: 972-291-0715 E-mail: jakes.jordaan@jordaanlaw.com	Legal		\$500,385.50
6.	Pierce Carson	PO Box 997 Cedar Crest, NM 87008 Phone: 505-463-9223 E-mail: wpiercecarson@aol.com	Royalties, Expenses, Wages	Disputed and subject to setoff	\$343,022.03
7.	Godbe Drilling LLC	62802 Ohlm Road Montrose, CO 81403 Phone: 970-209-1164 Fax: 520-743-3776 E-mail: godbedrilling@gmail.com	Trade debt		\$270,157.72

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<sup>&</sup>lt;sup>3</sup> The Debtors reserve their rights to dispute the claims on this schedule on any basis and to assert rights to setoff even if the claim is not listed as any of contingent, unliquidated, disputed or subject to setoff.

Rank	NAME OF CREDITOR	Telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted	Nature of claim (trade debt, bank loan, government contract, etc.)	Indicate if claim is contingent, unliquidated, disputed or subject to setoff <sup>3</sup>	Amount of claim
8.	Canarc Resource Corp.	Canarc Resource Corp. 301-700 West Pender Street Vancouver, British Columbia V6B 1G8 Canada Attention: Catalin Chiloflischi, CEO Phone: 604-685-9700 Fax: 604-685-9744 E-mail: info@canarc.net	Loan		\$249,615.35
9.	Ilmars Pucurs	92 Alpine Court Demarest, NJ 07627 Phone: 201-694-8307 E-mail: pucurs@aol.com	Convertible Loan		\$189,163.00
10.	Bruce Bradley	262 St. Joseph Avenue Long Beach, CA 90803 E-mail: bbradley262@aol.com	Convertible Loan		\$187,996.00
11.	Nancy Foster	Richard J. Foster 500 Pacific Coast Highway, Suite 210-A Seal Beach, CA 90740 Phone: 562-598-9200 Fax: 562-598-9212 E-mail: foster@fosterlawandsports.com	Convertible Loan		\$179,080.00
12.	Boart Longyear	2640 West 1700 S Salt Lake City, UT 84104 Phone: 905-491-4472 E-mail: robert.closner@boartlongyear.com	Trade debt		\$137,025.83
13.	Industrial & Mine Supply Co., Inc.	PO Box 1330 Carlsbad, NM 88221 Phone: 505-344-8024 Fax: 575-887-1162	Trade debt		\$136,153.85
14.	Justin Keener dba JMJ Financial	26800 Aliso Viejo Pkwy., Suite 200 Aliso Viejo, CA 92656 Phone: 949-340-6336 Fax: 949-596-9136 E-mail: alove@jmj.com	Convertible Loan		\$124,444.44
15.	Wagner Equipment Co.	PO Box 919000 Denver, CO 80291 Phone: 303-739-3000 Fax: 303-739-3191	Trade debt		\$115,789.43

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Rank	NAME OF CREDITOR	Telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted	Nature of claim (trade debt, bank loan, government contract, etc.)	Indicate if claim is contingent, unliquidated, disputed or subject to setoff <sup>3</sup>	Amount of claim
16.	Davies Public Affairs	808 State St. Santa Barbara, CA 93101 Phone: 805-963-5929 Fax: 805-962-4550 E-mail: ecastillo@daviespublicaffairs.com	Trade debt		\$107,359.31
17.	Vista Capital Investments, LLC	406 9 <sup>th</sup> Ave., Suite 201 San Diego CA 92101 Attn: David J. Clark Phone: 619-543-0328 E-mail: dclark@vci.us.com	Loan		\$100,384.00
18.	Stark Schenkein & Co.	3600 S Yosemite Str. Denver, CO 80237 Phone: (303) 691-6700 E-mail: info@singerlewak.com	Professional Fees		\$73,546.50
19.	BTE West International	PO Box 9056 Mesa, AZ 85214 Phone: (480) 214-0576 Fax: (480) 214-0580	Trade debt		\$70,171.48
20.	Minerals Advisory Group	6914 N Camino Martin Suites 120 Tucson, AZ 85741 Phone: (520) 887-7357 Fax: (520) 887-7420	Trade debt		\$64,391.28

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

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In re	: Chapter 11
	:
SANTA FE GOLD CORPORATION, et al.,	: Case No. 15-11761 (MFW)
•	:

Debtors.<sup>1</sup> : Joint Administration Requested :

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# CERTIFICATION CONCERNING DEBTORS' AMENDED LIST OF CREDITORS HOLDING TWENTY LARGEST UNSECURED CLAIMS ON A CONSOLIDATED BASIS

The debtors and debtors-in-possession in the above-captioned cases (collectively, the "<u>Debtors</u>") hereby certify under penalty of perjury that the *Amended List of Creditors Holding Twenty Largest Unsecured Claims on a Consolidated Basis* (the "<u>Amended Top 20 List</u>"), submitted herewith, is complete and, to the best of the Debtors' knowledge, correct and consistent with the Debtors' books and records as of August 24, 2015.

The information contained herein is based upon a review of the Debtors' books and records. However, no comprehensive legal and/or factual investigations with regard to possible defenses to any claims set forth in the Amended Top 20 List have been completed. Therefore, the listing does not, and should not be deemed to, constitute: (1) a waiver to any defense to any listed claim; (2) an acknowledgement of the allowability of any listed claim; and/or (3) waiver of any other right or legal position of the Debtors.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 26, 2015

/s/ Jakes Jordaan

Jakes Jordaan

President, Chief Executive Officer, and Chairman of the Board

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Santa Fe Gold Corporation (4315); Azco Mica, Inc. (8577); The Lordsburg Mining Company (4474); and Santa Fe Gold (Barbados) Corporation (N/A). The Debtors' mailing address is 1219 Banner Mine Road, Lordsburg, New Mexico 88045.