

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

<p>In re:</p> <p>WESTMORELAND COAL COMPANY, et al.,¹</p> <p style="text-align: center;">Debtors.</p>	§ § § § § § §	<p>Chapter 11</p> <p>Case No. 18-35672 (DRJ)</p> <p>(Jointly Administered)</p>
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THE WLB PURCHASER’S EXHIBIT AND WITNESS LIST

Westmoreland Mining Holdings, LLC and its affiliates (the “WLB Purchaser”) hereby file this Exhibit and Witness List for the hearing to be held on March 25, 2019, at 10:00 a.m. in Courtroom 400 of the United States Courthouse, 515 Rusk Street, Houston, Texas 77002.

EXHIBITS

NO.	Description	M	a	r	k	O	f	e	r	O	b	j	e	c	t	A	d	m	i	t	W/D	Disposition After Trial	
1.	Order Confirming the Amended Joint Chapter 11 Plan of Westmoreland Coal Company and Certain of its Debtor Affiliates [Docket No. 1561]																						
2.	Amended Joint Chapter 11 Plan of Westmoreland Coal Company and Certain of its Debtor Affiliates [Docket No. 1561]																						
3.	Order Authorizing and Approving Intercompany Settlement Term Sheet [Docket No. 1548]																						

¹ Due to the large number of debtors in these chapter 11 cases, for which joint administration has been granted, a complete list of the debtors and the last four digits of their tax identification, registration, or like numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent in these chapter 11 cases at www.donlinrecano.com/westmoreland. Westmoreland Coal Company’s service address for the purposes of these chapter 11 cases is 9540 South Maroon Circle, Suite 300, Englewood, Colorado 80112.

NO.	Description	M a r k	O f f e r	O b j e c t	A d m i t	W/D	Disposition After Trial
4.	Order (I) Approving the Sale of the Kemmerer Mine and Substantially all Asset Related Thereto Free and Clear of All Non-Assumed Liens, Claims, Encumbrances and Interests, (II) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases and (III) Granting Related Relief [Docket No. 1560]						
5.	Form of Asset Purchase Agreement among Westmoreland Resource Partners, LP, Westmoreland Kemmerer, LLC., Westmoreland Kemmerer Fee Coal Holdings, LLC, Western Coal Acquisition Partners, LLC and Merida Natural Resources [Docket No. 1401]						
6.	Zurich General Indemnity Agreement [Prairie Mines & Royalty ULC]						
7.	Zurich General Agreement of Indemnity [Westmoreland Coal Kemmerer and Absaloka Mines]						
8.	Zurich General Agreement of Indemnity dated January 30, 2012						
9.	Zurich General Agreement of Indemnity dated May 29, 2013						
10.	Zurich General Agreement of Indemnity dated September 29, 2017 [Prairie Mines & Royalty ULC]						
11.	Zurich General Agreement of Indemnity dated March 11, 2019						
12.	Liquidating Trust Agreement						
13.	Kemmerer Approval and Permit to Mine						
14.	Email from Jeffrey S. Stein to Brian Hodges, dated March 12, 2019						

NO.	Description	M a r k	O f f e r	O b j e c t	A d m i t	W/D	Disposition After Trial
15.	Email from Emily Newell to Joe Micheletti, Jeffrey Kukura and Jeffrey S. Stein, dated March 14, 2019						
16.	Joseph Micheletti's notes from Hodges call, dated March 20, 2019						
17.	Corporate Surety Bond No. 9038760, dated January 31, 2012						
18.	Reclamation Performance Bond No. 9038761, dated January 31, 2012						
19.	Surety Company Bond No. 9038762, dated February 12, 2012						
20.	Coal Reclamation Performance Bond No. 9038763, dated January 31, 2012						
21.	Reclamation Performance Bond General Purpose Rider, Surety Company Bond No. 9038763, dated June 30, 2015						
22.	Reclamation Performance Bond Increase /Decrease Rider, Surety Company Bond No. 9038763, dated March 31, 2015						
23.	Reclamation Performance Bond Increase /Decrease Rider, Surety Company Bond No. 09038763, dated April 10, 2017						
24.	Reclamation Performance Bond Increase /Decrease Rider, Surety Company Bond No. 09038763, dated April 10, 2017 (Effective date of Decrease 2/8/17)						

NO.	Description	M a r k	O f f e r	O b j e c t	A d m i t	W/D	Disposition After Trial
25.	Reclamation Performance Bond Increase /Decrease Rider, Surety Company Bond No. 09038763, dated December 19, 2017						
26.	Fuel Tax Surety Bond No. 9038768, dated April 25, 2012						
27.	Bond Under Lease for Mining Deposits, No. 09258446, dated October 12, 2017						
28.	Corporate Surety Bond No. 09258447, dated November 8, 2017						
29.	Any pleadings, reports, exhibits, transcripts, proposed orders, Court orders, or other documents filed in the above-captioned bankruptcy case						
30.	Any exhibit introduced by any other party						
31.	Rebuttal or impeachment exhibits as necessary						

WITNESSES

The WLB Purchaser may call the following witnesses at the hearing:

1. Joseph E. Micheletti.
2. Jeffery S. Stein.
3. Thomas Clarke.
4. Rebuttal witnesses as necessary.
5. Any witness listed by any other party.

The WLB Purchaser reserves its right to amend or supplement this Exhibit and Witness List as necessary in advance of the hearing.

Dated: March 23, 2019.

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By: /s/ John F. Higgins

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