

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
KANSAS CITY DIVISION**

In re:

BLUE SUN ST. JOE REFINING, LLC, et al.,

Debtors.<sup>1</sup>

Case No. 15-42231

(Lead Case)

Chapter 11

**STATEMENT UNDER LOCAL BANKRUPTCY RULE 2015-2(A)**

Blue Sun St. Joe Refining, LLC (“Blue Sun St. Joe”), Blue Sun Energy, Inc. (“Blue Sun Energy”), Blue Sun Biodiesel, LLC (“Blue Sun Biodiesel”), and Blue Sun Advanced Fuels, LLC (“Blue Sun Advanced Fuels” and together with Blue Sun St. Joe, Blue Sun Energy, and Blue Sun Biodiesel, the “Blue Sun Debtors”), debtors and debtors-in-possession in the above-captioned Chapter 11 cases, by and through undersigned counsel, as and for their Statement under Local Bankruptcy Rule 2015-2(A), state as follows:

**Rule 2015-2(A) Statement**

1. No trustee or creditors committee has been appointed in any prior bankruptcy case.
2. The following are the only known pending actions against the Blue Sun Debtors or the Blue Sun Debtors’ property: None.
3. None of the Blue Sun Debtors’ property is in the possession, custody, or control of a public officer, receiver, trustee, assignee for the benefit of creditors, mortgagee, pledgee, or assignee of rents.

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<sup>1</sup> Blue Sun St. Joe Refining, LLC, debtor and debtor-in-possession in Case No. 15-42231, Blue Sun Energy, Inc., debtor and debtor-in-possession in Case No. 15-42232-11, Blue Sun Advanced Fuels, LLC, debtor and debtor-in-possession in Case No. 15-42234-11, Blue Sun Biodiesel, LLC, debtor and debtor-in-possession in Case No. 15-42233-11 (collectively, the “Blue Sun Debtors”).

4. The Blue Sun Debtors are occupying premises under a lease, as follows:
  - a. Triple Net Real Estate Lease Agreement
  - b. Lessor: Terra Bioenergy, LLC
  - c. Lessee: Blue Sun St. Joe Refining, LLC
  - d. Property Address: 5701 Stockyards Expressway, St. Joseph, MO 64504
  - e. Lease Expiration Date: September 27, 2015
  - f. Remaining One (1) Year Renewal Options: 3
  - g. Monthly Rent: \$165,000
  - h. Amount Past Due as of the Petition Date: \$302,559.35<sup>2</sup>
  - i. Lease Negotiations: It is anticipated that Lessor will be filing a chapter 11 case in this district in the near term, along with a request for joint administration with the Debtor's chapter 11 cases. The Blue Sun Debtors and Lessor intend to file a joint plan of reorganization that provides for a merger of the businesses.
  - j. Blue Sun Advanced Fuels, LLC is a lessee of Blue Sun St. Joe Refining, LLC under a \$100 per year sub-lease.

5. The names and addresses of the Debtor's utility providers are contained within Exhibit "A" attached hereto.

RESPECTFULLY SUBMITTED this 3rd day of August, 2015.

LENTZ CLARK DEINES, PA

/s/ Jeffrey A. Deines  
Jeffrey A. Deines, MO #53531  
Shane J. McCall, KS #24564  
9260 Glenwood

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<sup>2</sup> Includes real estate taxes due under the lease.

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Proposed Bankruptcy Counsel for the Blue  
Sun Debtors

**Blue Sun Debtors**  
**Utility Providers**  
**LR 2015-2(A) Statement, Ex. A**

<b>Name</b>	<b>Description</b>	<b>Address</b>
Atmos Energy Marketing, LLC	Gas	PO Box 847311, Dallas, TX 75284
ATT	Telephone	PO Box 5001, Carol Stream, IL 60197-5001
ATT acct xxx-xxx-xxxx 857	Telephone	PO Box 5019, Carol Stream, IL 60197-5019
ATT U-Verse	Internet	PO Box 5014, Carol Stream, IL 60197-5014
Central Disposal Service	Trash	PO Box 1181, St Joseph, MO 64502
City of St. Joseph	Sewer	1100 frederick, RM 106, St Joseph, MO 64501
KCPL	Electricity	PO Box 219703, Kansas City, MO 64121
Missouri American Water	Water	PO Box 94551, Palantine, IL 60094-4551
Missouri Gas Energy	Gas	PO Box 219255, Kansas City, MO 64121-9255
Safety Kleen	Lab Trash	PO Box 650509, Dallas, TX 75265-0509
Sprint	Telephone	PO Box 54977, Los Angeles, CA 90054
U.S. Energy Services, Inc.	Gas	32604 Collection Center Dr., Chicago, IL 60693-01
Walter Louis Fluid Technologies	Chemcials for water in boilers	5330 S. 5th Street, Quincy, IL 62301-4896
Water Doctor CVB, Inc.	Chemcials for water in boilers	PO Box 3060, St Joseph, MO 64503