

FILED

OCT 13 2010

**BEFORE THE
ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING**

Jim Ruby, Executive Secretary
Environmental Quality Council

IN THE MATTER OF THE PETITION
TO DECLARE AN AREA
COMMONLY KNOWN AS SAND
CREEK, VERY RARE OR
UNCOMMON

Docket No. 09-1103

**MINERAL HILL, LP OBJECTION TO PETITION AND
REQUEST FOR CONTESTED CASE PROCEEDING**

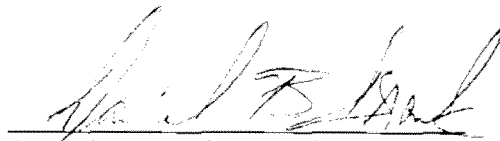
COMES NOW Mineral Hill, LP, by and through its attorney, Daniel B. Frank of Frank Law Office, P.C., and pursuant to the EQC Rules, Ch. 7, § 5, hereby objects to the above captioned Petition and requests that the hearing proceed under contested case procedures, with the right to cross examine witnesses. Mineral Hill, LP further requests the appointment of a hearing examiner to govern the proceedings.

Mineral Hill, LP is a mineral owner of ten (10) unpatented mining claims (appearing in Appendix A) within and adjacent to the area described in the Petition and the fee simple absolute owner of 267 acres that is surrounded by the lands proposed for designation. Mineral Hill, LP's ability to develop its claims and fee lands will be adversely affected or possibly taken in an unconstitutional manner in the event that the Petition is granted. Therefore, Mineral Hill, LP is entitled to status as a "party" to these proceedings.

WHEREFORE, Mineral Hill, LP respectfully requests the Council to proceed with any and all hearings in this matter under the procedures for contested cases in accordance

with EQC Rules, Ch. 7, § 5 and to appoint a hearing examiner for this case and to recognize Mineral Hill, LP as a party to this proceeding.

DATED this 13th day of October, 2010.



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Attorney for Mineral Hill, LP

CERTIFICATE OF SERVICE

I, the undersigned, certify that I served a true and correct copy of the foregoing by email of a PDF file and by placing same in the U.S. Mail, postage prepaid, on the 13 day of October, 2010 addressed to the following:

erik@voiceforthewild.org

Erik Molvar
P.O. Box 1512
Laramie, WY 82073

