

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

IN THE MATTER OF THE OBJECTION)	
TO THE SMALL MINE PERMIT OF)	
McMURRY READY MIX CO.)	Docket No. 10-4803
TFN 5 3/143)	

**MCMURRY READY MIX COMPANY
PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**

This matter was brought before the Environmental Quality Council (“EQC” or “Council”) on December 10, 2010, at 8:30 a.m., in Rock Springs, Wyoming. Present for the EQC was the Presiding Officer Dennis Boal and Councilwoman Cathy Guschewsky. Chairman Tim Flitner and Councilman John Morris participated by telephone. Councilman Dr. Fred Ogden attended by Megameeting. The Department of Environmental Quality (DEQ) Land Quality Division (LQD) was present through legal counsel Luke Esch, Assistant Attorney General. The applicant, McMurry Ready Mix Company (“MRM” or “McMurry”), was present through legal counsel Harriet M. Hageman. Objectors, Dave and Sandra Goodwin, Harv and Denise Hastings, Debra White, David Payne, Randy Simpson and Kelly Garside (collectively referred to below as the “Boulder Objectors”) were present through legal counsel Mark D. Sullivan. Objector, East Fork Limited Partnership (East Fork) was present through legal counsel Jon Aimone.

Pursuant to the Wyoming Environmental Quality Act (Act), the EQC “shall act as the hearing examiner for the department and shall hear and determine all cases or issues arising under the laws, rules, regulations, standards or orders issued or administered by the department or its air quality, land quality, solid and hazardous waste management or water quality divisions.” WYO. STAT. ANN. § 35-11-112(a). The EQC is required to: “Conduct hearings in any case contesting the grant, denial, suspension, revocation, or renewal of any permit, license, certificate or variance authorized or required” by the Act. WYO. STAT. ANN. § 35-11-112(a)(vi). This matter was brought before the EQC pursuant to WYO. STAT. ANN. § 35-11-406(k), concerning the issuance of mining permits. This matter pertains to McMurry’s application for a proposed regular sand and gravel mining operation in Sublette County, Wyoming. Having received the evidence and arguments of the parties, examined MRM Exhibits A, G, J, K, N, P, U, Y, DD, FF and GG; Boulder Objectors Exhibits 1, 3, 8, 10, 12, 13, 14, 16, 17, 21, 23, 26, 31, 32, 33, 34, 35 and 36; East Fork Exhibits 1, 2, 3, 4, and 5 and DEQ/LQD Exhibits A, B, C and H; and having read the transcript and deliberated on the matter at its January 13, 2011 meeting, the EQC voted to deny the issuance of a permit. Those voting in favor of the denial of MRM’s permit were Councilman John Morris, Councilman Dr. Fred Ogden, Councilwoman Cathy Guschewsky, Councilman Dennis Boal, Councilman Tom Coverdale and Chairman Tim Flitner. Voting against denying MRM’s permit was Councilman David Searle. The EQC hereby makes the Findings of Fact, Conclusions of Law and issues the Order set out below:

FINDINGS OF FACT

Basic Facts

1. The McMurry mine is an existing sand and gravel operation that has been operated since February 15, 2008, as a 10-acre ET (limited mining operation). (Hr'g. Tr. at 30; DEQ Ex. A).
2. MRM filed its application for surface mining permit with the DEQ/LQD on December 21, 2009. (DEQ Ex. A, Index).
3. The McMurry Permit authorizes the expansion of the limited mining operation beyond 10 acres and allows it to expand over the next twenty (20) years. (DEQ Ex. A, MP-1).
4. On September 22, 2010, the DEQ/LQD determined that MRM's application was technically complete. (Hr'g. Tr. at 32).
5. Notice that the application was technically complete was published in the Pinedale Roundup Newspaper on October 1, 2010, October 8, 2010, October 15, 2010 and October 22, 2010. (DEQ Ex. A, Publication and Filing).
6. The deadline for filing objections to MRM's application was November 22, 2010. (DEQ Ex. A, Publication and Filing).
7. Mr. and Mrs. Goodwin filed their objection to MRM's application on November 8, 2010. Mr. Garside filed his objection the MRM's application on November 19, 2010. The remaining Boulder Objectors, Hastings, Payne, White and Simpson,

- filed their objection to MRM's application on November 22, 2010. (A.R., Objection letters Goodwin; Garside and Goodwin, Hastings, White & Simpson).
8. East Fork filed its objection to MRM's application on November 22, 2010. (A.R., East Fork Objection Letter).
 9. The Boulder Objectors made the following objections: 1. The proposed operation constitutes a public nuisance or endangers the public health and safety, and 2. MRM's proposed mining operation is contrary to law and the public policy of the State of Wyoming, specifically Executive Order 2010-4. (A.R., November 22, 2011 objection letter from Sullivan).
 10. East Fork made the following objections: 1. MRM has failed to comply with the Sublette County Zoning and Development Regulations, 2. MRM has failed to comply with statutory requirements, specifically WYO. STAT. ANN. § 35-11-406(j) by failing to provide proper notice of its permit application, and 3. MRM's proposed mining operation is contrary to law and the public policy of the State of Wyoming, specifically Executive Order 2010-4. (A.R., East Fork Objection Letter).
 11. Notice of the time and place for the hearing in this proceeding was sent to the parties on November 23, 2010 and December 6, 2010. (A.R., Notice of Hearing and Order and Notice of Hearing).

Ultimate Facts

12. The Boulder Objectors asserted that truck traffic to and from MRM's proposed mining operation will create hazardous driving conditions on County Roads 133,

- 113 and State Highway 353. (Hr'g. Tr. at 159-163, A.R. November 22, 2011 objection letter from Sullivan).
13. The Boulder Objectors confirmed in their testimony that, other than truck traffic associated with mining operations in the area, traffic on County Roads 113, 133 and State Highway 353, is minimal. (Hr'g. Tr. at 175, 199, 236 & 251).
 14. The Boulder Objectors did not testify that they use or cross MRM's access road within the boundary of its proposed mining operation as shown in its application. (Hr'g. Tr. 159-179, 180-224, 224-245, & 245-258).
 15. The Boulder Objectors do not object to nor complain about truck traffic traveling on MRM's access road within its proposed permit boundary. The Boulder Objectors' only complaints were in association with truck traffic on the public highway and county roads in the area. *Id.*
 16. Testimony from the Boulder Objectors showed that truck traffic traveling to MRM's mining operation occasionally commenced around 5:15 a.m. and continued after dark. (Hr'g. Tr. at 190, 200 & 232-233).
 17. Prior to November 12, 2009, Sublette County did not consider the transportation of gravel to fall under the definition of "operations" under the McMurry's Conditional Use Permit. (McMurry Ex. F, G and H).
 18. On occasion trucks could be using County Roads 113, 133 and Highway 353 up to 300 times a day to travel to and from MRM's mining operation. (Hr'g. Tr. at 312).

19. Truck traffic resulting from MRM's existing mining operation (10 acre ET), when active, averaged 47.23 loads per day and 12.75 loads per day at 300 days per year. (Hr'g. Tr. at 305, McMurry Ex. DD).
20. Trucks coming from the north to the south and entering MRM's proposed mining operation may cross over into the opposite lane of State Highway 353. (Hr'g. Tr. at 164-165).
21. The Wyoming Department of Transportation also uses MRM's access road to enter and leave its' own sand and gravel pit and has not constructed a turning lane to accommodate its trucks using State Highway 353 to turn onto or off of the public road at the entrance of the access road. (Hr'g. Tr. at 323-326).
22. There are three other mining operations located near the area where MRM has requested a permit to expand its existing mining operation; the Sublette County Bousman pit, the State of Wyoming Highway Department pit, and a private gravel pit owned by Mark Jones. (Hr'g. Tr. at 28).
23. The Boulder Objectors testified that they are afraid to use or cross County Roads 133 and 113 when engaged in activities including driving, bicycling, horseback riding or walking during times when trucks are traveling to and from the mining operations in the area. (Hr'g. Tr. at 160, 187, 248-249, & 256).
24. MRM has taken steps, in relation to the Boulder Objectors concerns, to reduce the speed and noise of haul trucks using County Roads 113, 133 and State Highway 353, including requesting Sublette County to install reduced speed limit and no Jake brake signs on and along County Roads 133 and 113. (Hr'g. Tr. at 302-303).

In addition, MRM has contacted contractors directly requesting that they instruct their truck drivers not to exceed the posted speed limit or use Jake brakes. (Hr'g. Tr. at 303, McMurry Ex. J).

25. Sublette County is responsible for the construction and maintenance of County Road 133 and has imposed a thirty-five mile-per-hour speed limited and prohibited the use of Jake brakes along County Road 133. (Hr'g. Tr. 206, 37).
26. MRM's application states that its proposed "[m]ining operation will normally be conducted during daylight hours on any day of the week. Equipment maintenance requiring lighting, truck travel or the running of generators may be conducted at any time. Because of the nature of projects requiring construction aggregate, pit operations will be seasonal and will be most active during the late spring, summer and early fall. Truck traffic will also vary seasonally and will additionally depend on commodity sales. The primary haulage route from the pit will be Highway 353." (Hr'g. Tr. at 330, DEQ Ex. A, Mine Plan at MP-5, MP-17).
27. The Boulder Objectors did not present any evidence that mining operations and related activities within MRM's proposed permit boundary would create a public nuisance or a public health and safety risk. (Hr'g. Tr. 159-179, 180-224, 224-245, & 245-258).
28. The Boulder Objectors and East Fork asserted that MRM's Permit Application is contrary to the law or public policy of the State of Wyoming, specifically that MRM failed to comply with Executive Order 2010-4. (A.R., November 22, 2011 objection letter from Sullivan, East Fork Objection Letter).

29. The evidence from the Boulder Objectors shows that Sage Grouse in the Goodwin Lek occasionally leave the area, but that they do return. The Boulder Objectors testified that in their opinion, truck traffic from the mining operations in the area is the cause of the Sage Grouse leaving the area. (Hr'g. Tr. at 194-195, 228 & 242).
30. MRM's application was filed on December 21, 2009, eight (8) months prior to the issuance of Executive Order 2010-4. (Hr'g Tr. at 33, DEQ Ex. A, Index).
31. At the time MRM filed its application, Executive Order 2008-2 was in effect. (Hr'g. Tr. at 118-119).
32. Executive Order 2008-2 did not require a project impact area analysis (PIAA). (Hr'g. Tr. at 119-121, Boulder Objectors Ex. 16).
33. Executive Order 2010-4 requires a PIAA. Executive Order 2010-4 was not in effect at the time MRM filed its permit application. (Hr'g. Tr. at 33 & 118-119).
34. Executive Order 2010 requires that a PIAA be conducted to determine the maximum allowable disturbance of suitable sage grouse habitat within an area affected by a project such as MRM's proposed mining operation. (Boulder Objectors Ex. 17 at B-1).
35. No habitat assessment was conducted by the Wyoming Game and Fish Department for the PIAA. The Wyoming Game and Fish Department process manual states that if a habitat assessment is not conducted, the Department assumes all habitat within the PIAA is considered suitable habitat. (Hr'g. Tr. 133).

36. Assuming all habitat to be suitable for the purposes of the PIAA results in a more conservative result. (Hr'g. Tr. 143-144).
37. A PIAA was not performed as a part of MRM's permit application and as a result, all areas associated with the application were considered suitable sage grouse habitat. (Hr'g. Tr. at 144). The evidence shows that the Wyoming Game and Fish Department did perform an analysis of the sage grouse and surrounding habitat when reviewing MRM's proposed mining operation in accordance with the directives of Executive Order 2010-4. (Hr'g. Tr. at 144-151).
38. According to Executive Order 2010-4, surface disturbances will be limited to 5% of suitable sage grouse habitat per an average of 640 acres. (Boulder Objectors Ex. 17 at B-3).
39. The evidence shows that MRM's proposed mining operation does not violate the requirement of a PIAA or the 5% cap. (Hr'g. Tr. at 144-151).
40. Executive Order 2010-4 requires that any new main roads used to transport production products be 1.9 miles or greater from the perimeter of occupied sage grouse leks. (Boulder Objectors Ex. 17 at B-4).
41. The evidence shows that all roads used to travel to and from MRM's proposed mining operation are existing roads. (Hr'g. Tr. at 125 & 157-158).
42. Executive Order 2010-4 requires that new noise levels be limited to 10 dBA above ambient noise measured at the perimeter of the lek from 6 p.m. to 8 a.m. during initiation of breeding from March 1 to May 15. (Boulder Objectors Ex. 17 at B-4).

43. The evidence shows that MRM's proposed mining operation will not violate the noise level requirement of Executive Order 2010-4. (Hr'g. Tr. at 125-126).
44. The evidence shows that MRM's permit application complies with Executive Order 2008-2 and 2010-4 and is protective of sage grouse because MRM's proposed mining operation will not disturb greater than 5% of 640 acres, meets the noise limitations, meets the distance limitations and meets the requirements of a PIAA because all lands surrounding and within MRM's proposed mining operation are considered suitable sage grouse habitat. (Hr'g. Tr. at 33, 124, 125-126, 144 & 148-151).
45. MRM and the DEQ/LQD consulted with the Wyoming Game and Fish Department and the U. S. Fish and Wildlife Service to preserve and protect sage grouse. (Hr'g. Tr. at 343-346, DEQ Ex. A, App. D9). The evidence shows that both the Wyoming Game and Fish Department and U. S. Fish and Wildlife Service reviewed MRM's application and neither made a recommendation to the DEQ/LQD to deny a mining permit to MRM. (Hr'g Tr. at 126 & 154).
46. The DEQ relies on the Wyoming Game and Fish Department to recommend permit conditions that comply with Executive Orders. (Hr'g. Tr. 57).
47. MRM paid the required fee associated with the filing of its application. (Hr'g. Tr. at 97).
48. MRM's application contains the name and address of the applicant and the names and addresses of all managers, partners and executives directly responsible for

- MRM's mining operations in Wyoming. (Hr'g. Tr. at 90, DEQ Ex. A, Permit to Mine & App. E at ADJ-13).
49. MRM's application contains a sworn statement showing the power and legal estate for the right to mine from the land described in the application. (Hr'g. Tr. at 90, DEQ Ex. A, Permit to Mine).
 50. MRM's application contains a sworn statement that MRM has not forfeited a bond posted for reclamation purposes and that all the statements contained in the application are true and correct to the best knowledge of the applicant. (Hr'g. Tr. at 90, DEQ Ex. A, Permit to Mine).
 51. MRM's application contains the last known addresses of the owners of record of the surface and mineral estates on the land covered by the proposed mining permit. (Hr'g. Tr. at 90-91, DEQ Ex. A, App. AB at ADJ-7 & ADJ-8).
 52. MRM's application contains the names and last known addresses of the owners of record of the surface rights of the lands immediately adjacent to the proposed permit area. (Hr'g. Tr. at 90-91, DEQ Ex. A, App. AB at ADJ-9).
 53. MRM's application identifies by legal description the land included in the permit area including the approximate number of acres to be affected and the total number of acres in the area covered by the proposed permit. (Hr'g. Tr. at 91, DEQ Ex. A, App. C & Permit to Mine at Form 1, p. 2 of 4).
 54. MRM's application identifies Pinedale, Wyoming as the nearest town to the proposed mining operation. (DEQ Ex. A, Permit to Mine).

55. MRM's application includes a mining plan and reclamation plan that is consistent with the objectives and purposes of the Act and the LQD non-coal rules and regulations. (Hr'g. Tr. at 92, DEQ Ex. A, Mine Plan & Reclamation Plan).
56. MRM's application includes a general description of the land together with its vegetative cover, the annual rainfall, the general directions and average velocities of the winds, indigenous wildlife, its past a present uses, its present surface waters, adjudicated water rights and their immediate drainage areas and uses, the nature and depth of the overburden, topsoil, subsoil mineral seams and other deposits and any subsurface waters know to exist above the deepest projected depth of the proposed mining operation. (Hr'g. Tr. at 91, DEQ Ex. A, App. D).
57. MRM's application includes a United States Geological Survey topographical map of the permit area. (Hr'g. Tr. at 91, DEQ Ex. A, App. C at Figure C1).
58. MRM's application includes a map based on public record based on the boundaries of the land affected, its surrounding immediate drainage area, the location and names, where known, of all roads, railroads, and public or private right-of-way. (Hr'g. Tr. at 91, DEQ Ex. A, App. E).
59. MRM's application identifies the types of minerals to be mined. (Hr'g. Tr. at 91-92, DEQ Ex. A, Permit to Mine at Form 1, p. 2 of 4).
60. MRM's application sets forth the estimated dates of commencement and termination of the requested permit. (Hr'g. Tr. at 92, DEQ Ex. A, Permit to Mine & Mine Plan at MP-1.2).

61. MRM's application confirms that MRM carries liability insurance for its proposed mining operation. (Hr'g. Tr. at 92, DEQ Ex. A, Adjudication at ADJ-5).
62. MRM's application includes a statement of the present and proposed use of the land after reclamation. (Hr'g. Tr. at 92, DEQ Ex. A, Appendix D1 & Rec. Plan).
63. MRM's application includes information about surface gradient to a contour suitable for the proposed use after reclamation is complete. (Hr'g. Tr. at 92, DEQ Ex. A, Reclamation Plan at Figure RP-1).
64. MRM's mining operation, reclamation program and future use is not contrary to the law or policy of this state, or the United States. (Hr'g. Tr. at 97).
65. MRM's mining operation will not irreparably harm, destroy, or materially impair any area that has been designated as rare or uncommon by the EQC. (Hr'g. Tr. at 97-98).
66. The DEQ/LQD determined that the area proposed by MRM for its mining operation does not have any particular historical, archaeological, wildlife, surface, geological, botanical or other scenic values that it will irreparably harm. (Hr'g. Tr. at 98, DEQ Ex. A, Mine Plan at MP-1.5.4).
67. MRM's proposed mining operation will not cause pollution of any waters in violation of the State of Wyoming or the federal government. (Hr'g. Tr. at 98, DEQ Ex. A, Mine Plan at MP-3).
68. MRM has not had any other permit or license or bond revoked by the DEQ/LQD. (Hr'g. Tr. at 98, DEQ Ex. A, License to Mine).

69. The DEQ/LQD determined that MRM's proposed mining operation will not constitute a public nuisance or endanger the public health and safety. (Hr'g. Tr. at 98, DEQ Ex. A, Mine Plan at MP-5).
70. MRM's proposed permit boundaries are not within 300 feet of any occupied structure. (Hr'g. Tr. at 38 & 98-99, DEQ Ex. A, DEQ Ex. A, Mine Plan at MP-1.5.5).
71. MRM will be able to perform reclamation of the proposed mining site in a manner consistent with the purpose and provisions of the Act. (Hr'g. Tr. at 38 & 99, DEQ Ex. A, Reclamation Plan).
72. MRM is not currently in violation of the Act. (Hr'g. Tr. at 39).
73. The DEQ/LQD division determined that MRM's application for its proposed mining operation is complete pursuant to WYO. STAT. ANN. § 35-11-406. (Hr'g. Tr. at 97).

CONCLUSIONS OF LAW

1. The EQC has jurisdiction over the subject matter and the parties to this proceeding.
2. The EQC does not have jurisdiction in this proceeding to decide the Air Quality issues.
3. All notice requirements for the hearing have been met pursuant to the Act, the EQC rules of practice and procedure and the LQD non-coal rules and regulations.
4. "Any interested person has the right to file written objections to the application [for mining permit] with the administrator within thirty (30) days after the last

publication of the above notice..... The council or director shall publish notice of the time, date and location of the hearing or conference in a newspaper of general circulation in the locality of the proposed operation once a week for two (2) consecutive weeks immediately prior to the hearing or conference. The hearing shall be conducted as a contested case in accordance with the Wyoming Administrative Procedure Act, and right of judicial review shall be afforded as provided in that act." WYO. STAT. ANN. § 35-11-406(k), the Wyoming Administrative Procedure Act, WYO. STAT. ANN. §§ 16-3-101 through 16-3-115 and the EQC's Administrative Rules and Regulations (2001).

5. "The council shall act as the hearing examiner for the department and shall hear and determine all cases or issues arising under the laws, rules, regulations, standards or orders issued or administered by the department or its air quality, land quality, solid and hazardous waste management or water quality divisions." WYO. STAT. ANN. § 35-11-112(a).
6. The Council shall, "[c]onduct hearings in any case contesting the grant, denial, suspension, revocation or renewal of any permit, license, certification or variance authorized or required by this act." WYO. STAT. ANN. § 35-11-112(a)(iv).
7. The objectors bear the burden of proof in the proceedings herein. "The general rule in administrative law is that, unless a statute otherwise assigns the burden of proof, the proponent of an order has the burden of proof." (Hr'g. Tr. at 10), See also *JM v. Dep't. of Family Serv.*, 922 P.2d 219, 221 (Wyo. 1996) (citation omitted).

8. WYO. STAT. ANN. § 35-11-406(m) provides as follows:

The requested permit, other than a surface coal mining permit, shall be granted if the applicant demonstrates that the application complies with the requirements of this act and all applicable federal and state laws. The director shall not deny a permit except for one (1) or more of the following reasons:

- (i) The application is incomplete;
- (ii) The applicant has not properly paid the required fee;
- (iii) Any part of the proposed operation, reclamation program, or the proposed future use is contrary to the law or policy of this state, or the United States;
- (iv) The proposed mining operation would irreparably harm, destroy, or materially impair any area that has been designated by the council a rare or uncommon area and having particular historical, archaeological, wildlife, surface geological, botanical or scenic value;
- (v) If the proposed mining operation will cause pollution of any waters in violation of the laws of this state or of the federal government;
- (vi) If the applicant has had any other permit or license issued hereunder revoked, or any bond posted to comply with this act forfeited;
- (vii) The proposed operation constitutes a public nuisance or endangers the public health and safety;
- (viii) The affected land lies within three hundred (300) feet of any existing occupied dwelling, home, public building, school, church, community or institutional building, park or cemetery, unless the landowner's consent has been obtained. The provisions of this subsection shall not apply to operations conducted under an approved permit issued by the state land commissioner in compliance with the "Open Cut Land Reclamation Act of 1969";
- (ix) The operator is unable to produce the bonds required;
- (x) If written objections are filed by an interested person under subsection (g) of this section;
- (xi) If information in the application or information obtained through the director's investigation shows that reclamation cannot be accomplished consistent with the purposes and provisions of this act;
- (xii) through (xiv) Repealed by Laws 1980, ch. 64, § 3.
- (xv) If the applicant has been and continues to be in violation of the provisions of this act;
- (xvi) No permit shall be denied on the basis that the applicant has been in actual violation of the provisions of this act if the violation has been corrected or discontinued.

9. WYO. STAT. ANN. § 35-11-406(m) requires that a permit be granted if the applicant demonstrates that the application complies with the requirements of the Environmental Quality Act and all applicable state and federal laws. The permit can only be denied for the enumerated criteria in WYO. STAT. ANN. § 35-11-406(m).

DECISION

1. The Boulder Objectors and East Fork are interested persons with the right to file written objections to MRM's Permit Application.
2. The Boulder Objectors and East Fork failed to show that MRM's requested small mine permit should be denied for the endangerment of wildlife, creating a public nuisance, improper notice or for being contrary to the law as set forth in WYO. STAT. ANN. § 35-11-406(m)(iii), (iv) and (vii).
3. Ingress and egress to MRM's access road may create a public health and safety risk as trucks must sometimes cross to the other side of the road in order to turn into MRM's proposed mining operation. WYO. STAT. ANN. § 35-11-406(m)(vii).
4. Pursuant to the authority vested in the Environmental Quality Council by WYO. STAT. ANN. § 35-11-406, the Council hereby **FINDS** that the Permit Application submitted by MRM regarding Mine Permit No. TFN 5 3/143 should be **DENIED**, with a request that MRM submit to the DEQ/LQD amendments to its application filed on December 21, 2009 to address EQC concerns relating to protecting and preserving sage grouse, hours of operation and protection of the public health and safety relating to the ingress and egress of MRM's access road.

ORDER

IT IS THEREFORE ORDERED that the Permit Application filed by McMurry Ready Mix Company for Permit No., TFN 5 6/072 is hereby **DENIED**.

SO ORDERED this _____ day of _____, 2011.

Dennis Boal, Presiding Officer
Environmental Quality Council
122 West 25th Street
Herschler Building, Room 1714
Cheyenne, Wyoming 82002

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 24th day of February, 2011, a true and correct copy of the foregoing **McMURRY READY MIX COMPANY'S PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**, was served upon the following:

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/s/ 
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