

FILED

JUL 20 2011

*Jim Ruby, Executive Secretary
Environmental Quality Council*

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

**IN THE MATTER OF THE OBJECTION)
TO THE MINE PERMIT OF)
LOST CREEK ISR, LLC, TFN 4 6/268)**

Docket No. 11-4803

LOST CREEK ISR'S DESIGNATION OF WITNESSES AND EXHIBITS

In accordance with the Presiding Officer's Order of July 7, 2011, and pursuant to the terms of the Joint Stipulated Motion to Modify Prehearing Deadlines executed and filed by the Parties on July 18, 2011 (the "Stipulated Motion"), applicant Lost Creek ISR, LLC ("Lost Creek") hereby designates and respectfully submits the following lists of witnesses and exhibits:

WITNESSES

Will Call:

1. John Cash, Vice President Regulatory Affairs, Geology and Exploration, Ur-Energy, 5880 Enterprise Drive, Suite 200, Casper, Wyoming 82609 (307-265-2373). Mr. Cash has personal knowledge of all matters related to the Lost Creek ISR Application for WDEQ Permit to Mine (the "Application"), and will be called to provide factual testimony relevant to each contested issue set forth in the Amended Objections.

2. Errol P. Lawrence, P.G., Senior Hydrologist and Permitting Specialist, Petrotek Engineering Corporation, 10288 W. Chatfield Ave., Suite 201, Littleton, Colorado 80127 (303-290-9414). Mr. Lawrence has personal knowledge of technical matters related to the Application, and will be called to provide factual and expert testimony relevant to those contested issues set forth in the Amended Objections that relate to aquifer reclassification and exemption; the geology and hydrogeology of the relevant mining area; and the location and treatment of existing abandoned wells.

May Call:

1. Wayne Heili, President, Ur-Energy, 5880 Enterprise Drive, Suite 200, Casper, Wyoming 82609 (307-265-2373). Mr. Heili has personal knowledge of all matters related to the Application, and may be called to provide factual testimony relevant to each contested issue set forth in the Amended Objections.

2. Hal P. Demuth, M.S., Senior Engineer and Hydrologist, Petrotek Engineering Corporation, 10288 W. Chatfield Ave., Suite 201, Littleton, Colorado 80127 (303-290-9414). Mr. Demuth has personal knowledge of technical matters related to the Application, and may be called to provide factual and expert testimony relevant to those contested issues set forth in the Amended Objections that relate to aquifer reclassification and exemption; the geology and

hydrogeology of the relevant mining area; and the location and treatment of existing abandoned wells.

3. Kenneth J. Cooper, P.E., Senior Engineer, Petrotek Engineering Corporation, 10288 W. Chatfield Ave., Suite 201, Littleton, Colorado 80127 (303-290-9414). Mr. Cooper has personal knowledge of technical matters related to the Application, and may be called to provide factual and expert testimony relevant to those contested issues set forth in the Amended Objections that relate to aquifer reclassification and exemption; the geology and hydrogeology of the relevant mining area; and the location and treatment of existing abandoned wells.

4. Mark Moxley, District 2 Supervisor, Land Quality Division, Wyoming Department of Environmental Quality, 510 Meadowview Drive, Lander, WY 82520, (307) 332-3047. Mr. Moxley has personal knowledge of factual and technical matters related to the Application, and may be called to provide testimony relevant to the State's approval of the Application and aquifer reclassification, as well as each contested issue set forth in the Amended Objections.

5. Amy Boyle, District 2 Senior Environmental Analyst, Land Quality Division, Wyoming Department of Environmental Quality, 510 Meadowview Drive, Lander, WY 82520, (307) 332-3047. Ms. Boyle has personal knowledge of factual and technical matters related to the Application, and may be called to provide testimony relevant to the State's approval of the Application and aquifer reclassification and exemption, as well as each contested issue set forth in the Amended Objections.

6. Deborah Harris, District 2 Supervisor, Water Quality Division, Wyoming Department of Environmental Quality, 510 Meadowview Drive, Lander, WY 82520 (307) 335-6980. Ms. Harris has personal knowledge of factual and technical matters related to the Application and to the Statement of Basis for Lost Creek ISR Project Groundwater Reclassification, Class V (Mineral Commercial) (the "Statement of Basis"), and may be called to provide testimony relevant to the State's approval of the Application and the Statement of Basis, as well as the contested issues set forth in the Amended Objections that relate to aquifer reclassification and exemption.

7. Kevin Frederick, Groundwater Section Manager, Water Quality Division, Wyoming Department of Environmental Quality, 122 W. 25th St., Herschler Building, 4th Floor-West, Cheyenne, WY 82002, (307) 777-5985. Mr. Frederick has personal knowledge of factual and technical matters related to the Application and to the Statement of Basis, and may be called to provide testimony relevant to the State's approval of the Application and the Statement of Basis, as well as the contested issues set forth in the Amended Objections that relate to aquifer reclassification and exemption.

8. Scott Gamo, Staff Terrestrial Biologist, Wyoming Game and Fish Department 5400 Bishop Blvd., Cheyenne, WY 82006, (307) 777-4600. Mr. Gamo has personal knowledge of factual and technical matters related to the Application, and may be called to provide testimony relevant to the State's approval of the Application and those contested issues set forth in the Amended Objections that relate to Application terms and conditions included to comply with Executive Order 2011-5.

9. John Emmerich, Deputy Director, Wyoming Game and Fish Department, 5400 Bishop Blvd., Cheyenne, WY 82006, (307) 777-4600. Mr. Emmerich has personal knowledge of factual matters related to the Application, and may be called to provide testimony intended to rebut any testimony or other evidence offered in relation to factual or legal questions that may be raised that are not related to compliance with the terms of Executive Order 2011-5.

10. Any witnesses designated by any other party, which Lost Creek may call for direct examination or for the purposes of foundation, rebuttal or impeachment.

11. Any other witnesses necessary for rebuttal or impeachment purposes.

EXHIBITS

Lost Creek 1. Lost Creek ISR Application for WDEQ Permit to Mine, including associated correspondence file maintained by WDEQ.

Lost Creek 2. Statement of Basis for Lost Creek ISR Project Groundwater Reclassification, Class V (Mineral Commercial) (Apr. 26, 2011).

Lost Creek 3. Memorandum of Agreement between the State of Wyoming, WDEQ Water Quality Division, and the U.S. Environmental Protection Agency ("USEPA") Region 8 (Apr. 12, 1983).

Lost Creek 4. Letter from John Wagner, Administrator, WDEQ Land Quality Division, to Steven J. Pratt, P.E., Director, Ground Water Program, USEPA Region 8 (Apr. 28, 2011).

Lost Creek 5. Letter from Steven S. Tuber, Asst. Regional Administrator, Office Partnerships & Regulatory Assistance, USEPA Region 8, to Kevin Frederick, WDEQ Water Quality Division (June 8, 2011).

Lost Creek 6. Executive Order 2011-5, Office of the Governor, State of Wyoming.

Lost Creek 7. Executive Order 2010-4, Office of the Governor, State of Wyoming.

Lost Creek 8. Executive Order 2008-2, Office of the Governor, State of Wyoming.

Lost Creek 9. Letter from John Emmerich, Deputy Director, Wyoming Game & Fish Department, to Melissa Bautz, Land Quality Division, WDEQ (Mar. 3, 2011).

Lost Creek 10. Curriculum vitae of Errol P. Lawrence, P.G., Senior Hydrologist and Permitting Specialist, Petrotek Engineering Corp.

Lost Creek 11. Curriculum vitae of Hal P. Demuth, M.S., Senior Engineer and Hydrologist, Petrotek Engineering Corp.

Lost Creek 12. Curriculum vitae of Kenneth J. Cooper, P.E., Senior Engineer, Petrotek Engineering Corp.

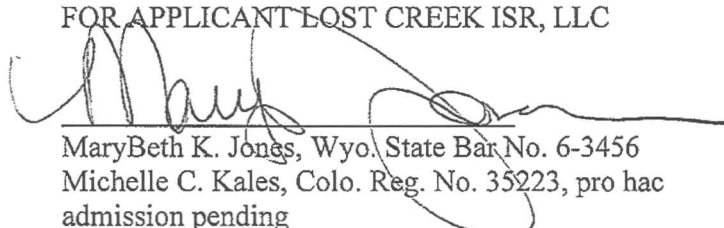
All exhibits designated by any other party.

Any document necessary for impeachment or rebuttal purposes.

In accordance with the terms agreed to by the parties in the Stipulated Motion, Lost Creek may supplement the list of exhibits set forth herein by designating, exchanging, and filing with the Council a listing of specific volumes or sections of the Application by Monday, July 25, 2011.

DATED this 20th day of July, 2011.

FOR APPLICANT LOST CREEK ISR, LLC

A handwritten signature in black ink, appearing to read 'MaryBeth K. Jones', is written over a horizontal line. The signature is fluid and cursive.

MaryBeth K. Jones, Wyo. State Bar No. 6-3456
Michelle C. Kales, Colo. Reg. No. 35223, pro hac
admission pending
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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of July, 2011, a true and correct copy of **LOST CREEK ISR'S DESIGNATION OF WITNESSES AND EXHIBITS** was filed by electronic mail to *kim.waring@wyo.gov* and served by electronic mail and U.S. Mail, postage prepaid, to the following:

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