

**FILED**  
**JUL 25 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

**MOTION FOR ADMISSION PRO HAC VICE – MICHELLE C. KALES**

Lost Creek ISR, LLC ("Lost Creek"), by and through undersigned counsel Brownstein Hyatt Farber Schreck, LLP, hereby moves this Council for the admission of Michelle C. Kales to appear in this matter *pro hac vice* in compliance with Rule 11 of the Rules Providing for the Organization and Government of the Bar Association and Attorneys at Law of the State of Wyoming, and pursuant to Rule 104 of the Uniform Rules for District Courts of the State of Wyoming, and as grounds for this motion states as follows:

1. Ms. Kales is a shareholder with the law firm of Brownstein Hyatt Farber Schreck, LLP in Denver, Colorado where she is admitted and licensed to practice law and a member in good standing of the Bar.
2. Ms. Kales has not previously sought *pro hac vice* admission in Wyoming.
3. Ms. Kales has never been disciplined in any jurisdiction, nor are there any disciplinary proceedings currently pending with any bar or bar associations.
4. Ms. Kales represents Applicant Lost Creek in this matter and Lost Creek has been notified of her request for permission to appear on their behalf in this case.
5. Ms. Kales acknowledges that she is subject to, and shall comply with, the Wyoming statutes, rules of the Wyoming Supreme Court, including but not limited to, the Rules of Professional Conduct, the Disciplinary Code for the Wyoming State Bar, the Rules of the Supreme Court of Wyoming Providing for the Organization and Government of the Bar

Association and the Attorneys at Law of the State of Wyoming, the Wyoming Rules of Civil Procedure and that such rules have been read and will be followed throughout the *pro hac vice* admission.

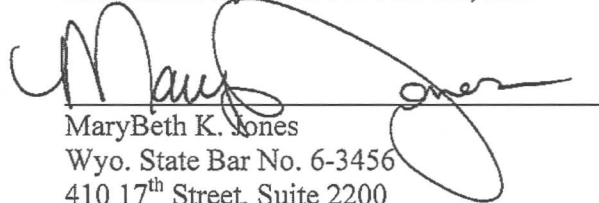
6. For purposes of this representation, Ms. Kales is associated with the undersigned MaryBeth K. Jones, Wyoming registration number 6-3456, Brownstein Hyatt Farber Schreck, LLP, 410 17th Street, Suite 2200, Denver, Colorado 80202, a member in good standing of the Wyoming Bar and admitted and licensed to practice in Wyoming. MaryBeth K. Jones hereby agrees to associate with Ms. Kales on this case.

7. Attached hereto is the Certificate of Compliance with Rule 11.

**WHEREFORE**, Lost Creek ISR, LLC requests that the Council enter an Order permitting Michelle C. Kales to appear *pro hac vice* in this matter as counsel for Applicant Lost Creek ISR, LLC.

Respectfully submitted this 25th day of July, 2011.

Brownstein Hyatt Farber Schreck, LLP



MaryBeth K. Jones  
Wyo. State Bar No. 6-3456  
410 17<sup>th</sup> Street, Suite 2200  
Denver, CO 80202-4004  
(303) 223-1100  
mjones@bhfs.com

For Applicant Lost Creek ISR, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on this 25th day of July, 2011, a true and correct copy of the foregoing **MOTION FOR ADMISSION PRO HAC VICE – MICHELLE C. KALES** was filed by electronic mail to *kim.waring@wyo.gov* and served by electronic mail and U.S. Mail, postage prepaid, to the following:

John Corra, Director  
DEQ  
Herschler Building  
122 West 25<sup>th</sup> Street  
Cheyenne, WY 82002  
*john.corra@wyo.gov*

Steve Jones  
Wyoming Outdoor Council  
262 Lincoln Street  
Lander, WY 82520  
*steve@wyomingoutdoorcouncil.org*

Nancy Nuttbrock, Administrator  
DEQ Land Quality Division  
Herschler Building  
122 West 25<sup>th</sup> Street  
Cheyenne, WY 82002  
*nancy.nuttbrock@wyo.gov*

Penne A. Goplerud, General Counsel  
Ur-Energy USA Inc.  
10758 West Centennial Road  
Littleton, CO 80127  
*penne.goplerud@ur-energyusa.com*

Luke Esch, Assistant Attorney General  
Wyoming Attorney General's Office  
123 Capitol Building  
Cheyenne, WY 82002  
*lesch@state.wy.us*

John Cash  
VP Regulatory Affairs, Exploration and  
Geology  
Ur-Energy USA Inc.  
5880 Enterprise Drive, Suite 200  
Casper, WY 82609

  
Shirley M. Bingham



**CERTIFICATE OF COMPLIANCE  
WITH RULE 11**

Ms. Michelle C. Kales  
Brownstein Hyatt Farber Schreck LLP  
410 17th Street, Suite 2200  
Denver, CO 80202

RE: In the Matter of the Objection to the Mine Permit of Lost Creek  
Case Number: 11-4803, Environmental Quality Council

The above attorney has submitted an Application for Admission Pro Hac Vice to the Wyoming State Bar, along with supporting documentation. This attorney is compliant with Rule 11 of the Rules Providing for the Organization and Government of the Bar Association and Attorneys at Law of the State of Wyoming.

The above attorney has associated with the following local counsel, who is an active member of the Wyoming State Bar:

**Marybeth Kathryn Jones 6-3456**  
**Brownstein, Hyatt, Farber, Schreck, PC**  
**410 17th Street, 22nd Floor**  
**Denver, CO 80202**

  
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Nancy Shore, Admissions Director

Dated: July 21, 2011