

BEFORE THE ENVIRONMENTAL QUALITY COUNCIL

STATE OF WYOMING

**A PETITION TO THE ENVIORNMENTAL)
QUALITY COUNCIL FOR DESIGNATION)
OF AN AREA KNOWN AS SAND CREEK)
AS RARE OR UNCOMMON)**

Docket No. 09-1102

FILED
JUL 09 2009
Jim Ruby, Executive Secretary
Environmental Quality Council

MOTION TO RECONSIDER
RESPONDENT'S REQUEST FOR
STAY OF PROCEEDINGS

COMES NOW, John Green, General Partner of Mineral Hill, L.P., which are surface and mineral owners of property located in the Sand Creek area files this motion requesting that the Presiding Officer of the Environmental Quality Council reconsider respondent's request for stay of proceedings upon the following grounds:

1. The Presiding Officer finds in his Order that "any person may file a petition to designate lands as very rare and uncommon pursuant to Wyo. Stat. §35-11-112(a)(v)."
2. The petition in question is not filed by any person whatsoever but is, instead, filed by the Biodiversity Conservation Alliance, a corporation. The Biodiversity Conservation Alliance is a corporation under Wyoming law according to the records of the Wyoming Secretary of State. See Exhibit A attached. A corporation is not a person.
3. The addendum filed by Erik Molvar on behalf of the Biodiversity Conservation Alliance is: (a) not the petition; and (b) is signed by Molvar as the representative of Biodiversity corporation, an apparent layman practicing law without a license on behalf of the corporation, Biodiversity Conservation Alliance.

WHEREFORE, it is respectfully requested that the Council reconsider respondent's request for stay of proceedings.

Dated: July 9, 2009

Respectfully submitted,



John Green, General Partner
Mineral Hill, L.P.
PO Box 33010
Austin, TX 78764
Tel: 512-892-6430
Fax: 512-692-2936

CERTIFICATE OF MAILING

I certify that I have this 9th day of July, 2009, mailed the above and foregoing Reply to Response of Erik Molvar re Failure to Give Proper Notice to the Wyoming Environmental Quality Council, Herschler Bldg., Room 1714, 122 W. 25th St., Cheyenne, Wyoming 82002 and faxed it to them at 307-777-6134. I have also mailed a copy to the Attorney General's Office, Administrative Division, 123 Capital Building, 200 W. 24th St., Cheyenne, WY 82002.



John Green

**STATE OF WYOMING * SECRETARY OF STATE
MAX MAXFIELD
BUSINESS DIVISION**

200 West 24th Street, Cheyenne, WY 82002-0200
Phone 307-777-7311 · Fax 307-777-5339

Website: <http://soswy.state.wy.us> · Email: business@state.wy.us

Filing Information

Name **Biodiversity Conservation Alliance**
Filing Type NonProfit Corporation
Status Active

General Information

Fictitious Name		ID	1994-000290712
Old Name	Biodiversity Associates	Standing - Tax	Good
Sub Status	Current	Standing - RA	Good
Sub Type	Public Benefit	Standing - Other	Good
Formation Locale	Wyoming	Name Consent	N
Filing Date	05/02/1994 12:00 AM	Term of Duration	Perpetual
Delayed Effective Date		Expiration Date	
Inactive Date			

Registered Agent Address

Perry Wechsler
 Dept 3038 1000 E University
 University Of Wyoming Dept of Atmospheric Science
 Laramie, WY 82071 USA

Mailing Address

PO Box 1512
 Laramie, WY 82073 USA

Parties

Type Name / Organization / Address

Public Notes

EXHIBIT A

Filing Information

Name **Biodiversity Conservation Alliance**
Filing Type NonProfit Corporation
Status Active

Most Recent Annual Report Information

Type	Original			AR Year	2009
License Tax	\$25.00	AR Exempt	N	AR ID	01005818
AR Date	4/24/2009 9:28 AM	Electronic AR	Y		
Web Filed	N	AR Email	alywex@gmail.com		

Officers / Directors

Type	Name / Organization / Address
Director	Alyssa Wechsler
Director	Joycee Corcoran
Director	Perry Wechsler
President	Jeff Kessler
Secretary	Chip Rawlins
Treasurer	Chip Rawlins
Vice President	Jay Lillegraven

Principal Address

215 S 3rd St Ste 114
 Laramie, WY 82070 USA
 Phone: (307) 742-7978
 Fax: (307) 742-7989
 Email: sarah@voiceforthewild.org

Mailing Address

PO Box 1512
 Laramie, WY 82073 USA

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Name **Biodiversity Conservation Alliance**
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Status Active

Amendment History

Num	Type	Date	Delayed Date	Status	Username
2007-000607357	System Amendment	05/01/2007		Active	SYSTEM.USER
	RA Name Change	02/16/2006		Active	CRANDA
	RA Address Change	02/16/2006		Active	CRANDA
	Common Amendment	06/17/2002		Active	CRANDA