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FILED

DEC 08 2011

Jim Ruby, Executive Secretary
Environmental Quality Council

Attorney for the State of Wyoming,
Department of Environmental Quality

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

IN THE MATTER OF THE OBJECTION)
TO THE PROPOSED RENEWAL PERMIT) Docket No. 11-5602
SAND DRAW LANDFILL, SHWD FILE #10-195)

**DEQ'S OBJECTIONS TO PROPOSED FINDINGS OF FACT
AND CONCLUSIONS OF LAW**

In accordance with the Council's November 17, 2011 Order, the Wyoming Department of Environmental Quality hereby submits the following interlineated objections to Petitioner's Proposed Findings of Fact and Conclusions of Law.

FINDINGS OF FACT

1. Petitioner, Fremont County Solid Waste Disposal District (FCSWDD), is a Solid Waste Disposal District, duly formed in 1979 and existing pursuant to W.S. 18-11-101 et. seq.

Objection: None

2. The Wyoming Department of Environmental Quality, Solid and Hazardous Waste Division, (DEQ) among other things, regulates and permits solid waste disposal facilities pursuant to W.S. 35-11-101 et. seq.

Objection: None

3. This matter involves a Petition to review a proposed operating permit and the objection to the procedure involved and to certain permit conditions proposed to be included in the permit.

Objection: None

4. The Environmental Quality Council (EQC) has jurisdiction to hear this matter pursuant to W.S. 35-11-112, W.S. 16-3-101 et. seq; and the Rules and Regulations of the Wyoming Department of Environmental Quality.

Objection: None

5. FCSWDD operates 4 landfills and 11 transfer stations located within Fremont County, Wyoming.

Objection: None

6. One of the landfills is designated as the Sand Draw Landfill and is the landfill at issue in this matter.

Objection: None

7. The Sand Draw Landfill was first established in 1982 and began receiving waste shortly thereafter.

Objection: None

8. The Sand Draw Landfill is operated under one permit, but is divided into two separate areas, an 80 acre area that currently receives waste and a 137 acre expansion area that is designated to receive waste upon the 80 acre area reaching capacity.

Objection: None

9. The current permit application is primarily for the 80 acre area and addresses

the expansion area in a conceptual manner only.

Objection: None

10. The Sand Draw Landfill last received a permit for operation on October 31, 1995.

Objection: None

11. In 1999 FCSWDD implemented a groundwater monitoring system at the Sand Draw Landfill.

Objection: None

12. In 2000 there was a rise in the water level in the monitor well designated as R-8, which well is located on the edge of the expansion area and is approximately 1000 feet from the 80 acre area.

13. Due to the rise in water level in well R-8 further investigation was necessary and the FCSWDD sought alternatives to how or if waste would be disposed of in the expansion area.

Objection: None

14. Well R-8 was pumped and recharged to approximately 2 feet of the risen level, but has since steadily decreased without further recharge.

Objection: DEQ objects to this finding on two bases. First, the claim that R-8 "has since steadily decreased" is not supported in the record. The District's own witnesses testified that R-8 water levels are *flat*, not decreasing. See Hr'g Tr. 177, Nov. 16, 2011 (with respect to groundwater levels, Donald Siegel stated: "They're flat even in R-8."); Hr'g Tr. 231 (Dale Groutage, discussing R-8 water levels,

stated: "...we were flat for 20 years prior, flat 20 years later..."). Second, DEQ objects to this statement as incomplete. R-8 was not merely pumped, but pumped "almost completely dry." Hr'g Tr. 31.

15. On July 5, 2000 the FCSWDD's engineer expressed his opinion that well R-8 was located in a perched zone of water.

Objection: None

16. Isotopes, tritium data and carbon-14 age dating indicate that the groundwater under the facility has not recharged since the facility was opened.

Objection: DEQ objects to this finding on two bases: First, this finding is legally irrelevant, because Wyoming law protects all groundwater equally, regardless of when it entered the subsurface. Second, the Council made no finding with respect to whether the groundwater had recharged since the facility opened.

17. Upon investigation in the expansion area it was also determined that a cultural site was located in the expansion area and had to be cleared prior to the disposal of waste in that area.

Objection: None

18. As a result of the need for further investigations and to clear the cultural site, various extensions of the permit for the Sand Draw Landfill were granted by the DEQ, with the last extension expiring on May 1, 2004.

Objection: None

19. In 2001 and 2002 the DEQ and FCSWDD discussed the use of vertical expansion in the original 80 acre area.

Objection: None

20. On January 18, 2002 the DEQ authorized vertical expansion in the original 80 acre area.

Objection: None

21. Vertical expansion involves disposal of waste on top of existing waste and above the ground level.

Objection: None

22. In 2002 the DEQ anticipated that the use of vertical expansion in the original 80 acre area would add 10 to 14 years to the site life capacity and stated that they desired to maximize the vertical expansion capacity.

Objection: None

23. On March 17, 2003 the FCSWDD submitted a work plan for the original 80 acre area utilizing vertical expansion that planned for a closure date of December 31, 2018, the date when the area would reach capacity.

Objection: None

24. That at the time of the March 17, 2003 letter FCSWDD used a loose fill method of waste disposal, whereby the area was to be walled with straw bales and loose filled waste placed in cells and compacted.

Objection: None

25. On August 9, 2000 the FCSWDD projected a site life capacity of 31 years.

Objection: None

26. With the rise in water level in well R-8 and the discovery of the cultural site

the site life capacity was reduced on November 9, 2001 to 2.8 years.

Objection: None

27. On September 3, 2003 the site life capacity was further reduced to 0.3 years.

Objection: None

28. After vertical expansion was authorized the site life capacity was increased to the end of 2018.

Objection: None

29. In 2004-2005 the FCSWDD converted to a baler system of disposal of waste in which waste was compacted in a baler, bound by metal straps and then placed in the Sand Draw Landfill.

Objection: None

30. The baler system reduced the landfill space used by 50%, allowed for a more orderly and stable method for vertical expansion and provided a method that was less permeable to precipitation.

Objection: DEQ objects to this finding on two grounds. First, the Council did not render any decision on (i) the extent to which baler systems reduce space used, (ii) whether a baler system is more orderly and stable, and (iii) whether it is less permeable to precipitation. Second, this finding is not a relevant basis for the Council's decision.

31. On September 30, 2004 the FCSWDD anticipated that with the implementation of a baler system, the site life capacity for the 80 acre area of the Sand Draw Landfill would increase to 22 years.

Objection: None

32. In 2004 the FCSWDD also began to question the nature and extent of the groundwater at the Sand Draw Landfill, and specifically began to investigate whether the groundwater encountered by the monitor wells was part of an aquifer or were perched bodies of water that did not recharge.

Objection: None

33. On October 26, 2007 the FCSWDD projected that the original 80 acres of the Sand Draw Landfill had a capacity of 26.3 years.

Objection: None

34. On September 18, 2007 the DEQ tendered a proposed permit to the FCSWDD and prepared a public notice that stated that the site life capacity was 20 years.

Objection: None

35. On October 28, 2008 the DEQ issued a notice of violation for the Sand Draw Landfill, to which the FCSWDD did not request a hearing.

Objection: None

36. On August 24, 2009 the FCSWDD projected that the original 80 acres of the Sand Draw Landfill had a capacity of 31 years.

Objection: None

37. On September 30, 2009 the FCSWDD received notice from its engineers that Volatile Organic Compounds (VOC) were detected in 2 wells.

Objection: None

38. The VOCs detected were acetone, which is a common solvent used in

cleaning of the laboratory equipment, and Trichlorofluoromethane.

Objection: None

39. The VOCs were at estimated levels as there was a detection noted, but it was below the reporting level and thus was estimated at 50% of that reporting level.

Objection: None

40. On September 30, 2009 the FCSWDD's engineer rendered his opinion that the detections were the result of laboratory error.

Objection: None

41. On February 26, 2010 the DEQ filed a legal action in the First Judicial District Court against the FCSWDD alleging that the FCSWDD was operating the Sand Draw Landfill without a permit.

Objection: None

42. On September 28, 2010 the FCSWDD projected that the original 80 acres of the Sand Draw Landfill had a capacity of 26 years.

Objection: None

43. On September 30, 2010 the DEQ and FCSWDD thereafter entered into a consent decree which required the FCSWDD to submit a permit application by December 31, 2010.

Objection: None

44. On October 28, 2010 the DEQ sent a letter to the FCSWDD in which it proposed that disposal in the original 80 acres be allowed through vertical expansion until January 1, 2028.

Objection: None

45. On December 23, 2010 the FCSWDD submitted its application for a renewal operating permit to the DEQ.

Objection: None

46. In Section 4.8 of the permit application the FCSWDD's engineer conducted an evaluation of the groundwater quality and determined that the classification and only appropriate use was for industrial use.

Objection: None

47. The DEQ has not classified the groundwater nor set groundwater protection standards, but has committed to doing so by January 1, 2013.

Objection: None

48. In Section 5.5 of the permit application the FCSWDD's engineer conducted an evaluation of the groundwater and potential impacts to the surface and groundwater.

Objection: None

49. In Section 5.5 of the permit application the FCSWDD's engineer concluded that the body of evidence summarized above indicates that the historical operation of the Sand Draw Landfill has not adversely affected the groundwater below the facility, and that the design, operating and closure procedures described in this document will limit the potential for future adverse impacts to develop.

Objection: None

50. Section 5.4.1 of the Permit Application indicated that the 80 acre site would

reach capacity in the year 2037.

Objection: None

51. Included in the permit application were various appendices with information relied upon by the FCSWDD's engineer in completing the permit application.

Objection: None

52. Appendix V is a report entitled Compartmentalization of Ground Water at the Sand Draw #2 Landfill Site: Assessing Independent and Multidisciplinary Approaches by Dr. Donald I. Siegel, Ph.D.

Objection: None

53. Appendix Y is a March 23, 2010 follow up letter from Dr. Donald I. Siegel, Ph.D to the above report.

Objection: None

54. Dr. Donald I. Siegel is not a Wyoming registered professional engineer or geologist.

Objection: None

55. Since the submission of the permit renewal application there have been 6 additional detections of VOCs in monitor wells. Of those 6 detections, 5 were below the MCL level and were merely estimates.

Objection: DEQ objects to this finding because it is inaccurate. The finding should state that detections were "below the reporting limit," not "below the MCL level..."

56. The one detection of a VOC above the detection level, was submitted in a

split sample, with one sample indicating the VOC and the other not detecting it.

Objection: DEQ objects to this finding because it is inaccurate. The finding should state "above the reporting level," not "above the detection level..."

57. A resample of the well that the detection was made from did not detect the presence of the VOC.

Objection: None

58. Due to the above split sample and retesting it is questionable if the VOC detected was present in the sampled groundwater.

Objection: None

59. It is also questionable if the VOCs exist in the groundwater or are the result of the testing process.

Objection: None

60. On March 25, 2011 the DEQ issued its first review of the Permit Renewal Application.

Objection: None

61. Section 1.1 of the Permit review indicated that all material not signed and stamped by a Wyoming Professional Engineer or Geologist, including Appendices V and Y, had to be removed from the permit application.

Objection: None

62. Section 4.4 of the Permit review determined that vertical expansion beyond December 31, 2018 constituted a new cell/unit and would require an engineered containment system between the existing waste and waste to be placed above it in

vertical expansion.

Objection: None

63. On April 11, 2011 the FCSWDD submitted an objection to the Permit review on the basis that there is no regulatory or statutory authority to make the determination that vertical expansion of disposal above waste constitutes a new cell.

Objection: None

64. Pursuant to Chapter 2, Section 4(j) an engineered containment system is not applicable to vertical expansion.

Objection: DEQ objects to this finding on three grounds. First, this statement is inaccurate. Solid Waste Rules and Regulations ch. 2, § 4(j) does not state that engineered containment systems are not applicable to vertical expansions.

Rather, § 4(j) is silent as to its applicability to vertical expansions. Second, this is a legal conclusion, not a finding of fact. Third, the Council did not render a decision on this issue.

65. No formal response was received by the FCSWDD prior to what it perceived as an appeal deadline and the FCSWDD filed a Petition for review with the EQC.

Objection: None

66. On May 17, 2011 the DEQ issued a final permit review that removed the determination that the vertical expansion would constitute a new cell/unit.

Objection: None

67. On the basis of the final permit review the EQC Petition was dismissed without prejudice as moot.

Objection: None

68. Section 1.1 of the final permit review indicated that all material not signed and stamped by a Wyoming Professional Engineer or Geologist, including Appendices V and Y, had to be removed from the permit application

Objection: None

69. Section 3.7 of the final permit review made the determination that the groundwater quality at the landfill has been/is being altered.

Objection: None

70. No scientific basis for the DEQ determination that groundwater quality has been/is being altered, other than the above suspect detections of VOCs, was cited for the conclusion.

Objection: None

71. Section 4.4 of the final permit review determined that based upon the letter from the FCSWDD dated March 17, 2003, that the FCSWDD must demonstrate that the facility is not altering and will not alter the groundwater by October 1, 2013 or cease receiving waste by December 31, 2018.

Objection: None

72. The FCSWDD requested an opportunity to submit additional information or an amended permit application to the DEQ.

Objection: None

73. The DEQ, on July 1, 2011, disallowed the request of the FCSWDD and ordered that the FCSWDD publish the proposed permit that it had submitted to the

FCSWDD.

Objection: None

74. In order to comply with the DEQ rules and regulations and the statutes the FCSWDD published notice of the permit.

Objection: None

75. On August 25, 2011 the FCSWDD filed a written objection to the proposed permit and requested a hearing before the EQC.

Objection: None

76. The basis of the objection was that proper procedure for comment by the FCSWDD was not followed after issuance of the final permit review, that permit condition #1 is not in accordance with the law, and that permit condition #3 is arbitrary and capricious, an abuse of discretion and not in accordance with the law.

Objection: None

77. Permit condition #1 states that the operator of this facility shall remove all documents from the permit application, including but not limited to appendices V and Y, which have not been signed and stamped by a Wyoming Professional Engineer (P.E.) or Professional Geologist (P.G.) as required by Chapter 2, Section 2(b)(ii) of the Solid Waste Rules and Regulations.

Objection: None

78. Chapter 2, Section 2(b)(ii) of the Solid Waste Rules and Regulations provides that all permit applications shall be prepared under the supervision of a professional engineer registered in the State of Wyoming. All permit application forms shall be

stamped, signed and dated by a professional engineer. In addition, all portions of the permit application which require geological services or work shall be stamped, signed and dated by a professional geologist.

Objection: None

79. The application was stamped, signed and dated by Ken Schreuder, a Wyoming registered professional engineer and professional geologist.

Objection: This finding is incomplete, because it fails to state that Mr. Schreuder only partially certified the application, such that appendices V and Y were excluded from the certification. *See Hr'g Tr. 51, 333.*

80. W.S. 33-41-117(a)(vi) exempts from the State of Wyoming Geology licensing requirement persons engaged in teaching or research in the physical or natural sciences.

Objection: None

81. W.S. 33-41-117(a)(xi) exempts from the State of Wyoming Geology licensing requirement individuals engaged in drafting, sampling, sample preparation, and routine laboratory work in which the elements of initiative, scientific judgment and decision making are either lacking or not required, including the other activities which do not use scientific methods to process and interpret geologic data.

Objection: None

82. In the use of appendices V and Y the FCSWDD engineer and geologist, Ken Schreuder, used the data, laboratory work and sampling results contained therein to form his own opinions and did not rely upon the opinions of Dr. Donald I. Siegel.

Objection: None

83. Permit condition #3 provides that no later than October 13, 2013, the operator of this facility shall demonstrate that the facility is not altering and will not alter groundwater. If the operator fails to timely make such a demonstration, then (i) the original eighty (80) acres shall cease receipt of waste no later than December 31, 2018 and promptly begin closure activities, and (ii) the lifetime renewal permit shall include either a performance based design or an engineered containment system design for all units of the expansion area(s) that will receive waste after December 31, 2018.

Objection: None

84. Chapter 2, Section 5(x) of the Solid Waste Rules and Regulations provides that Solid Waste disposal facilities shall not be allowed to alter groundwater quality, as determined by groundwater monitoring.

Objection: None

85. There is a material difference between altering groundwater and altering groundwater quality.

Objection: DEQ objects to this finding because it is a conclusion of law, not a finding of fact.

86. The DEQ has not classified the groundwater at the Sand Draw facility nor set Groundwater Protection Standards for the facility and has only committed to do so prior to January 1, 2013.

Objection: DEQ objects to this finding because the term "only" is unnecessarily argumentative, and implies that DEQ could have made a greater commitment, which is not supported in the record or the law.

87. The portion of permit condition #3 pertaining to altering groundwater is not in accordance with the Solid Waste Rules and Regulations.

Objection: DEQ objects to this finding because it is a conclusion of law, not a finding of fact.

88. Chapter 2, Section 2(b)(x)(3) of the Solid Waste Rules and Regulations requires that the application for a permit renewal contain an evaluation of the facility's potential to impact surface and groundwater quality based on the design and the hydrogeologic information.

Objection: None

89. The permit condition #3 requires a demonstration that the facility will not alter the groundwater, as opposed to the Rules and Regulations requirement that there be an evaluation of the potential to impact groundwater quality.

Objection: DEQ objects to this finding because it is a conclusion of law, not a finding of fact.

90. Even with the use of an engineered containment system a showing would never be able to be made that a facility will not alter the groundwater, due to the fact that engineered containment systems can leak.

Objection: None

91. The portion of permit condition #3 pertaining to the showing that the facility will not alter the groundwater is not in accordance with the Solid Waste Rules and Regulations.

Objection: DEQ objects to this finding because it is a conclusion of law, not a

finding of fact.

92. Permit review section 3.7 makes the statement that groundwater monitoring data indicates groundwater quality at the Sand Draw Landfill has been/is being altered, but does not provide the basis for such decision.

Objection: None

93. There was no stated basis or rationale for the October 1, 2013 date that the demonstration in permit condition #3 must be completed.

Objection: DEQ objects to this finding because it is not supported in the record.

Evidence was introduced to establish the basis for the October 1, 2013 demonstration date. *See* Hr'g Tr. 121 (Carl Anderson testifying that "We use[d] that date in anticipation of the submittal of the next renewal application....So we thought that if the District made the demonstration in 2013, that would give us time to review that demonstration prior to submittal of the next renewal application.")

94. The DEQ has suggested various dates for closure of the original eighty (80) area.

Objection: None

95. In 2002 the DEQ suggested a date of 2012-2016.

Objection: None

96. In 2007 the DEQ suggested a date of 2027.

Objection: None

97. In 2010 the DEQ suggested a date of 2028.

Objection: None

98. The permit application provides for a date of 2037.

Objection: None

99. The FCSWDD capacity audit of October 10, 2011 indicates a capacity in the original 80 acres area until 2037.

Objection: None

100. The final permit review of May of 2011 and Permit condition #3 issued on July 1, 2011 contains a closure date of December 31, 2018 for the original 80 acres.

Objection: None

101. The date of December 31, 2018 is based upon a letter submitted by the FCSWDD on March 17, 2003.

Objection: None

102. The date of December 31, 2018 submitted by the FCSWDD was based upon the loose fill operation that was used by the FCSWDD at the time.

Objection: None

103. Since the March 17, 2003 letter from the FCSWDD the District has converted to a bale filled disposal system.

Objection: None

104. Bale filled systems, in comparison to loose fill systems, allows for over 50% more capacity in the same waste due to compaction, allows for more stable placement of bales, thus increasing the potential vertical capacity, and is less permeable than loose filled waste.

Objection: DEQ objects to this finding because the Council did not render any decision on (i) the extent to which baler systems reduce space used, (ii) whether a baler system is more orderly and stable, and (iii) whether it is less permeable to precipitation. Moreover, these findings are not relevant to the bases for the Council's decision.

105. The December 31, 2018 date proposed by the FCSWDD is not applicable and not relevant to the current operations of the Sand Draw Landfill.

Objection: None

106. The closure plan in the permit renewal application is based upon a closure date of 2037 in the original eighty (80) acres, and includes a phased closure plan.

Objection: None

107. A closure date of 2037 will maximize the capacity of the original eighty (80) acres.

Objection: DEQ objects to this finding because it is unsupported in the record, the Council did not render any decision on what closure date will maximize capacity of the original 80 acre area, and maximizing capacity is not a relevant basis for the Council's decision.

CONCLUSIONS OF LAW

Based upon the above stated Findings of Fact the Wyoming Environmental Quality Council makes the following conclusions of law:

1. The Environmental Quality Council (EQC) has jurisdiction to hear this matter pursuant to W.S. 35-11-112, W.S. 16-3-101 et. seq; and the Rules and Regulations of the

Wyoming Department of Environmental Quality.

Objection: None

2. The FCSWDD's engineer and geologist is allowed to rely upon data and information contained in Appendices V and Y of the renewal permit application pursuant to W.S. 33-41-117(a)(vi)(xi).

Objection: None

3. The FCSWDD's engineer and geologist is not allowed to rely upon the opinions stated in Appendices V and Y of the renewal permit application pursuant to the Solid Waste Rules and Regulations Chapter 2, Section 2(b)(ii).

Objection: None

4. Permit condition #1 is not in accordance with the law with regards to the data and information relied upon in Appendices V and Y of the renewal permit application.

Objection: None

5. Permit condition #3 is not in accordance with the law in requiring a demonstration that the facility is not altering the groundwater, in that Chapter 2, Section 5(x) prohibits a facility from altering the groundwater quality.

Objection: None

6. Permit condition #3 is not in accordance with the law in requiring a demonstration that the facility will not alter the groundwater, in that Chapter 2, Section 2(b)(x)(3) requires an evaluation of the facilities potential to impact the surface and groundwater quality.

Objection: DEQ objects to this conclusion because it does not accurately

characterize the basis for the Council's decision. Condition #3 was unlawful because it required a demonstration in relation to groundwater, not groundwater *quality*. The cited regulation is separate and distinct from the regulation prohibiting the alteration of groundwater quality, and therefore does not provide a basis for this conclusion.

7. There is no basis for the date of October 1, 2013 to make the demonstration and as such the same is arbitrary, capricious and an abuse of discretion.

Objection: DEQ objects to this conclusion because it is not supported by the record. Evidence was introduced to establish the basis for the October 1, 2013 demonstration date. *See* Hr'g Tr. 121 (Carl Anderson testifying that "We use[d] that date in anticipation of the submittal of the next renewal application....So we thought that if the District made the demonstration in 2013, that would give us time to review that demonstration prior to submittal of the next renewal application."). Accordingly, substantial evidence does not exist to support the claim that the 2013 demonstration date was arbitrary, capricious, or an abuse of discretion.

8. The requirement in permit condition #3 that failing such demonstration the original eighty (80) acres must cease receiving waste by December 31, 2018 is based upon a prior date suggested in 2003 under a different disposal method in the facility and is contradictory to other suggested dates by the DEQ and is without a logical basis, and as such is arbitrary, capricious and an abuse of discretion.

Objection: None

9. While the procedure for the renewal permit application comments could have been better handled following the final review, the procedures as stated in the Solid Waste Rules and Regulations were nonetheless followed and were in accordance with the law.

Objection: DEQ objects to this conclusion because is not supported by the record or the law, and because the Council rendered no opinion on whether “permit application comments could have been better handled...”

IT IS THEREFORE ORDERED that Permit Condition #1 shall be amended to provide that the Fremont County Solid Waste Disposal District shall redact all material from appendices V and Y of the renewal permit application other than data and information relied upon by their engineer and geologist in forming his opinion.

Objection: None

IT IS FURTHER ORDERED that Permit Condition #3 shall be deleted.

Objection: None

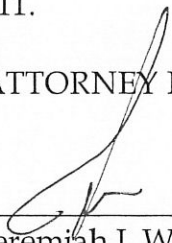
Dated this ____ day of _____, 2012

Rich Fairservis, Presiding Officer
Environmental Quality Council

WHEREFORE DEQ requests that the Council issue Findings of Fact and Conclusions of Law consistent with DEQ's objections presented herein.

Dated this 8th day of December, 2011.

ATTORNEY FOR DEQ




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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 8th day of December, 2011, a true and correct copy of *DEQ'S OBJECTIONS TO PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW* was served by placing the same in the United States mail, postage pre-paid, and via electronic mail to the following:

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Wyoming Office of the Attorney General