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- Counsel for Owner/Operator

## BEFORE THE ENVIRONMENTAL QUALITY COUNCIL STATE OF WYOMING

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## IN THE MATTER OF THE BOND FORFEITURE QUALITY LANDSCAPE AND NURSERY, INC. LMO ET1496

Docket No. 22-4503

## PETITIONER QUALITY LANDSCAPE AND NURSERY, INC.'s HEARING EXHIBIT LIST

Petitioner Quality Landscape & Nursery, Inc. ("Petitioner" or "QLN"), by and through its attorney James R. Salisbury, of The Salisbury Firm, P.C., hereby submits its exhibit list for Final Hearing as follows:

Exhibit No.	Brief Description	Stip.	Object	Rec'd	Reserved	Notes
QLN - A	Settlement Agreement dated July 29, 2020 (Ex. 1 to Notice of Appeal and Petition for Hearing)					
QLN – B	Consent Decree dated June 18, 2010 (Ex. 2 to Notice of Appeal and Petition for Hearing)					
QLN - C	Order Granting Permanent Restraining Order dated July 21, 2011 (Ex. 3 to Notice of Appeal and Petition for Hearing)					
QLN - D	Order Granting Motion to Alter or Amend dated March 6, 2012 ( <i>Ex. 4 to Notice of Appeal and Petition for Hearing</i> )					
QLN - E	Order Enforcing Settlement Agreement dated May 13, 2013 (Ex. 5 to Notice of Appeal and Petition for Hearing)					

Exhibit No.	Brief Description	Stip.	Object	Rec'd	Reserved	Notes
QLN - F	Findings of Fact, Conclusions of Law and Order dated October 31, 2019 (Ex. 6 to Notice of Appeal and Petition for Hearing)					
QLN – G	DEQ Reclamation Plans (undated) (DEQ - 1-2)					
QLN - H	2016-2017-2018 Inspections Report dated June 4, 2018 (DEQ - 25-34)					
QLN – I	June and July 2018 Inspections Report dated January 25, 2019 (DEQ – 35-42)					
QLN – J	2019 Annual Inspection Report dated August 13, 2019 (DEQ - 43-50)					
QLN – K	2020 Annual Inspection Report dated March 3, 2021 (DEQ - 51-59)					
QLN – L	2021 Annual Inspection Report dated June 23, 2021 (DEQ - 69-75)					
QLN – M	Limited Mining Operation Inspection report conducted August 9, 2022 (DEQ – 76-81)					
QLN – N	Limited Mining Operation Inspection report conducted September 27, 2022 (DEQ – 82-84)					
QLN – O	Memorandum of Safety Concerns at Saratoga Mine (undated) (DEQ – 85-88)					
QLN – P	Letter from Saratoga-Encampment-Rawlins Conservation District (undated) (DEQ - 106)					
QLN – Q	Memorandum of March 27, 2018 Meeting (DEQ – 122-123)					

Exhibit No.	Brief Description	Stip.	Object	Rec'd	Reserved	Notes
QLN – R	Emails re: Grading Plan for Subject Property (DEQ – 125-152)					
QLN – S	Notice of Increase in Bond Amount for Subject Limited Mining Operation (DEQ - 153)					
QLN - T	Reiman Corp. Invoicing and diagrams (DEQ – 160-163)					

- All exhibits listed by DEQ
- Any exhibits used for impeachment or rebuttal
- Any demonstrative exhibits which may be necessary
- Any documents necessary to lay foundation
- Any documents necessary for authentication

DATED: July 12, 2023.

QUALITY LANDSCAPE & NURSERY, INC. Petitioner

By: blisten

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COUNSEL FOR PETITIONER

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on the 12<sup>th</sup> day of July, 2023, to the following via the method indicated below:

David DeWald Shannon Leininger Deputy Attorneys General STATE OF WYOMING OFFICE OF THE ATTORNEY GENERAL Water & Natural Resources Division David.DeWald@wyo.gov Shannon.Leininger@wyo.gov

\_ COUNSEL FOR WYOMING DEPT. OF ENVIRONMENTAL QUALITY

Todd Parfitt, Director STATE OF WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY 122 West 25<sup>th</sup> Street Cheyenne, WY 82002 todd.parfitt@wyo.gov

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Gindall & Anderson OF THE Salisbury FIRM, P.C.