

LLC's ("Brook Mining") proposed mine plan and reclamation plan, the difficulties Padlock has in determining the full extent of the impact due to the deficiencies in the mine plan and reclamation plan, and Padlock's anticipated mitigation plan and associated costs and damages resulting from the proposed mining operations; (ii) Padlock's communications with Brook Mining/Ramaco personnel regarding requests for surface owner consent, the lack of negotiation on the part of Brook Mining with regard to a surface damage agreement, and the continuous failure of Brook Mining to provide sufficient information about mining operations for Padlock to make an informed decision regarding surface owner consent; and (iii) Padlock's experience dealing with other coal mines operating on or wanting to operate on Padlock's lands, including terms negotiated for surface use and damages. Mr. Patterson is further expected to testify consistent with Padlock's response to Brook Mine's petition for an order in lieu of consent, Padlock's discovery responses submitted in this matter, and his deposition testimony.

II. "May Call" Witnesses

Padlock may call the following individuals to testify at the final hearing in this matter:

A. JD Hill Livestock Manager for Padlock Ranch Company

If called, Mr. Hill is expected to testify regarding the operations of Padlock Ranch that appear to be impacted by Brook Mining's proposed mine plan and reclamation plan, as those operations pertain to livestock management. Mr. Hill may also testify regarding

Padlock's anticipated mitigation plan and associated costs and damages resulting from the proposed mining operations.

**B. John Buyok, P.E.
86 Monarch Rd.
Ranchester, WY 82839
(307) 673-0068
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Mr. Buyok is a licensed engineer that lives close to Brook Mining's proposed mining operations, and is currently a private engineering consultant with experience reviewing mine and reclamation plans. At the request of Trey Patterson, and for Mr. Buyok's own personal interests due to the proposed mine's close proximity to his property, Mr. Buyok reviewed the mine plan and reclamation plan at issue in this matter. He has also communicated with the Wyoming Department of Environmental Quality ("WDEQ") regarding the mine plan and reclamation plan, including B.J. Kristiansen, and conducted independent research. If called to testify, it is expected that Mr. Buyok's testimony might include, but not be limited to the following topics: (i) the incompleteness of various parts of the mine plan and reclamation plan; (ii) the large volume of truck traffic at different stages of mining; and (iii) Mr. Buyok's discussions with the WDEQ about the mine plan and reclamation plan.

C. Representatives of the WDEQ

Padlock may call one or more representatives/agents/employees of the WDEQ that have knowledge of Brook Mining's mine application, to discuss various aspects of the mine plan and reclamation plan.

D. Randall Atkins and other representatives/agents/consultants/engineers of Brook Mining and/or Ramaco

Padlock may call Mr. Atkins and/or other representatives, agents, consultants or engineers of Brook Mining and/or Ramaco, to discuss matters related to surface owner consent negotiations with Padlock, and to further discuss details, or lack thereof, in the mine plan and reclamation plan.

Padlock reserves the right to call (i) any and all "will call" and/or "may call" witnesses listed by the other parties; (ii) any witness necessary for impeachment and/or rebuttal; and (iii) any witness necessary to lay foundation for exhibits. Padlock further reserves the right to supplement this list of witnesses upon reasonable notice to the other parties prior to the final hearing in this matter.

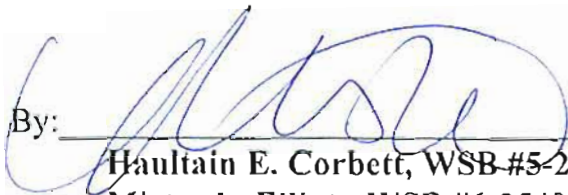
III. Exhibits

Padlock may offer the documents identified on the attached Exhibit List at the hearing in this matter. In addition to the exhibits listed, Padlock reserves the right to offer (i) any exhibit listed by the other parties (unless objected to); (ii) any exhibit needed for impeachment or rebuttal; (iii) any exhibit necessary and appropriate for demonstrative purposes. Padlock further reserves the right to supplement its exhibit list with any

documents produced or identified in discovery, or as otherwise reasonably appropriate prior to the hearing in this matter.

DATED this 18 day of August, 2016.

LONABAUGH AND RIGGS, LLP

By: 

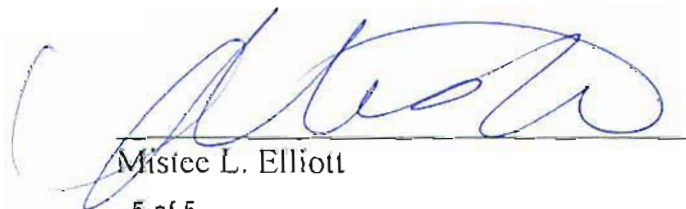
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the within and foregoing was sent to the following by depositing a copy of the same in the U.S. Mails, postage prepaid, on this 18 day of August, 2016.

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