



## **1. Jason N. Todd**

Mr. Todd is educated and trained in mining engineering with nearly twenty years of mining experience, which spans four continents and has primarily focused on coal mining. Mr. Todd will offer his opinions as to Brook Mining Co., LLC's surface coal mine application at issue in this contested case, particularly the submitted mine plan and its related documents, by evaluating the mining techniques, assumptions and parameters utilized in developing the mine plan, and the overall technical adequacy of the mine plan. A written designation of Mr. Todd's preliminary opinions, including the materials he has examined in developing his opinions, a statement of his qualifications, and his compensation for his work related to this matter are attached hereto as **Exhibit A**.

Mr. Todd will testify consistent with his statements and opinions as set forth in **Exhibit A** and reserves the right to expound upon and/or clarify those statements and opinions. Big Horn notes that discovery is yet to begin in this matter and Mr. Todd also reserves the right to supplement his opinions based upon the review of additional information and to provide testimony in rebuttal to any opinions offered by any expert witness designated by any other party to this action, provided that such rebuttal is within his areas of expertise.

Pursuant to the Order of Consolidation and Schedule of the EQC in this matter, dated March 13, 2017, all and any exhibits to be utilized or relied on by Mr. Todd will be disclosed on or before May 17, 2017. As a matter of good faith disclosure, at this time Mr. Todd does not intend to use any exhibits other than portions of Brook Mining Co., LLC's surface coal mine application, which is available to all parties in this matter.

## **2. Paul (Joe) Gerlach**

Mr. Gerlach is a Professional Geologist, educated and trained in the fields of geology and hydrology with forty years of experience in these fields, including significant experience related to coal mining operations. Mr. Gerlach also has significant experience in preparing and assisting in the preparation of several mine and/or reclamation plans related to surface coal mining permit applications. Mr. Gerlach will offer his opinions as to Brook Mining Co., LLC's surface coal mine application at issue in this contested matter, particularly regarding the hydrologic, geologic, subsidence and safety analysis and related impacts associated with the proposed coal mining operations. A written designation of Mr. Gerlach's preliminary opinions, including the materials he has examined in developing his opinions, a statement of his qualifications and his fee schedule for his work related to this matter, are attached hereto as **Exhibit B**.

Mr. Gerlach will testify consistent with his statements and opinions as set forth in **Exhibit B** and reserves the right to expound upon and/or clarify those statements and opinions. Again, Big Horn notes that discovery is yet to begin in this matter and Mr. Gerlach also reserves the right to supplement his opinions based upon the review of additional information and to provide testimony in rebuttal to any opinions offered by any expert witness designated by any other party to this action, provided that such rebuttal is within his areas of expertise.

Pursuant to the Order of Consolidation and Schedule of the EQC in this matter, dated March 13, 2017, all and any exhibits to be utilized or relied on by Mr. Gerlach will be disclosed on or before May 17, 2017. As a matter of good faith disclosure, at this time

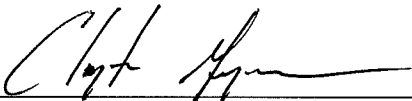
the exhibits Mr. Gerlach currently intends to utilize to support his opinions and testimony can be found included as part of **Exhibit B**. Mr. Gerlach also reserves the right to utilize any portion of Brook Mining Co., LLC's surface coal mine application as an exhibit to support his testimony, which is available to all parties in this matter.

Both Mr. Todd and Mr. Gerlach may also testify in support of any of the objections set forth in Big Horns Objections to Proposed Brook Mine Permit Application filed with the Wyoming Department of Environmental Quality, dated January 25, 2017, attached hereto as **Exhibit C**, provided the testimony is within their area of expertise.

Big Horn reserves the right to call any expert witness, whether retained or non-retained, designated by any other party to this action or identified in any manner pursuant to the Wyoming Rules of Civil Procedure, including those identified in written discovery responses and/or documents produced in response to discovery requests.

Big Horn also reserves the right to designate any and all witnesses necessary for rebuttal to any expert testimony offered by any other party to this matter.

DATED: April 3, 2017.

By   
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## CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2017, a true and correct copy of the foregoing was served by email to the following:

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