

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

**IN RE BENTONITE PERFORMANCE )  
MINERALS LLC ) DOCKET 18-1601**

**DECLARATION OF JENNIFER HARTMAN**

I, Jennifer Hartman, declare as follows:

1. I am an Environmental Specialist for Bentonite Performance Minerals LLC (BPM). I have been employed by BPM for approximately 12 years as a Mine Associate, Senior Mine Associate and Environmental Specialist, as well as having various other roles. I have held my current position for approximately 5 years. As a Mine Associate, Senior Mine Associate and Environmental Specialist, I am responsible for developing and implementing reclamation operations of surface lands disturbed by BPM's bentonite mining operations in compliance with the Wyoming Environmental Quality Act.
2. Wyoming Department of Environmental Quality Mine Permit 267C authorizes BPM to mine and remove bentonite deposits, some of which are located under surface lands owned by 2U Ranch LLC (2U). I am familiar with and contributed to the development and implementation of the reclamation plans, methods and schedules prescribed for surface lands disturbed by Mine Permit 267C mining operations. Mine Permit 267C requires that BPM conduct reclamation operations in a timely manner and contemporaneously with mining by integrating the mining and reclamation schedules and utilizing a back-casting reclamation method. The integrated mining and reclamation schedule and back-casting reclamation method results in the disturbed lands being reclaimed concurrently with the mining progression.

3. I am familiar with and contributed to the development of the proposed reclamation plan submitted with BPM's WSL-42804 permit amendment application materials that are the subject of this proceeding. The proposed reclamation plan recommends the adoption of the identical reclamation standards, methods and schedules previously approved for Mine Permit 267C surface lands, including the utilization of an integrated mining and reclamation schedule and the back-casting reclamation method.

4. Section 2.10.6 of the proposed mining plan describes the proposed mining progressions and schedules for the permit amendment lands and provides that "[a]s each new cut is made, the salvaged topsoil and subsoil and overburden materials are used to reclaim the previous pits in a timely and contemporaneous process." Mine Plan Figure 1 illustrates this integrated mining and reclamation process.

5. Section 2.11.3 of the proposed reclamation plan describes the proposed reclamation progressions and schedules for the amendment lands and provides "that reclamation is timely and concurrent with the mining operations" and that "the permittee commits to reclaiming the land concurrently with each new cut in each pit sequence." Reclamation Plan Figure 1 illustrates this integrated mining and reclamation process.

6. In compliance with Chapter 13 of the DEQ Rules, Section 2.11.3 of the proposed reclamation plan requests that "reclamation backfilling in a specific cut will begin within three (3) years from the date the cut was initiated and permanent seeding will be completed no later than five (5) years from the date the cut was initiated." While not required on permit amendment lands, BPM maintains the more aggressive 3/5 reclamation schedule for all lands covered by Mine Permit 267C.

7. Accurate copies of the proposed mine plan (together with map) and proposed reclamation plan (together with map) submitted with BPM's permit amendment application materials and evidencing the statements made herein are attached as exhibits to BPM's Reply in Support of Summary Judgment.

I declare under penalty of perjury that the foregoing declaration is true and accurate to the best of my knowledge and belief.

Dated: January 8, 2019.

  
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Jennifer Hartman

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