

James R. Salisbury, #6-3072  
 THE SALISBURY FIRM, P.C.  
 P.O. Box 1617  
 Cheyenne, WY 82003  
 Telephone: (307) 634-2002  
 Facsimile: (307) 316-0500  
 Email: [Jim@LawWyo.com](mailto:Jim@LawWyo.com)

- Counsel for Owner/Operator

D. David DeWald, WSB No. 7-5538  
 Senior Assistant Attorney General  
 Shannon Leininger, WSB No. 8-6932  
 Assistant Attorney General  
 WYOMING ATTORNEY GENERAL'S OFFICE  
 109 State Capitol  
 Cheyenne, WY 82002  
 Ph: (307) 777-7895  
 Fax: (307) 777-3542  
[david.dewald@wyo.gov](mailto:david.dewald@wyo.gov)  
[shannon.leininger@wyo.gov](mailto:shannon.leininger@wyo.gov)

- Counsel for Wyoming Dept. of Environmental Quality

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

**IN THE MATTER OF THE BOND FORFEITURE )  
 QUALITY LANDSCAPE AND NURSERY, INC. ) Docket No. 22-4503  
 LMO ET1496 )**

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**STIPULATED HEARING EXHIBIT LIST**

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Petitioner Quality Landscape & Nursery, Inc. (“Petitioner” or “QLN”), by and through its attorney James R. Salisbury, of The Salisbury Firm, P.C., and the Wyoming Department of Environmental Quality (“DEQ”), by and through its attorneys D. David DeWald and Shannon Leininger, hereby submit their stipulated exhibit list for Final Hearing as follows:

Exhibit No.	Brief Description	Stip.	Object	Rec'd	Reserved	Notes
QLN0001	Settlement Agreement dated July 29, 2020 <i>(Ex. 1 to Notice of Appeal and Petition for Hearing)</i>	Y				
QLN0002	Consent Decree dated June 18, 2010 <i>(Ex. 2 to Notice of Appeal and Petition for Hearing)</i>	Y				

<b>Exhibit No.</b>	<b>Brief Description</b>	<b>Stip.</b>	<b>Object</b>	<b>Rec'd</b>	<b>Reserved</b>	<b>Notes</b>
QLN0003	Order Granting Permanent Restraining Order dated July 21, 2011 <i>(Ex. 3 to Notice of Appeal and Petition for Hearing)</i>	Y				
QLN0004	Order Granting Motion to Alter or Amend dated March 6, 2012 <i>(Ex. 4 to Notice of Appeal and Petition for Hearing)</i>	Y				
QLN0005	Order Enforcing Settlement Agreement dated May 13, 2013 <i>(Ex. 5 to Notice of Appeal and Petition for Hearing)</i>	Y				
QLN0006	Findings of Fact, Conclusions of Law and Order dated October 31, 2019 <i>(Ex. 6 to Notice of Appeal and Petition for Hearing)</i>	Y				
QLN0007	DEQ's Reclamation Plan Cost Estimate for LMO 1496ET <i>(DEQ - 1-2)</i>	Y				
QLN0008	2016-2017-2018 Inspections Report dated June 4, 2018 <i>(DEQ - 25-34)</i>	Y				
QLN0009	June and July 2018 Inspections Report dated January 25, 2019 <i>(DEQ - 35-42)</i>	Y				
QLN0010	2019 Annual Inspection Report dated August 13, 2019 <i>(DEQ - 43-50)</i>	Y				
QLN0011	2020 Annual Inspection Report dated March 3, 2021 <i>(DEQ - 51-59)</i>	Y				
QLN0012	2021 Annual Inspection Report dated June 23, 2021 <i>(DEQ - 69-75)</i>	Y				
QLN0013	Limited Mining Operation Inspection report conducted August 9, 2022 <i>(DEQ - 76-81)</i>	Y				

<b>Exhibit No.</b>	<b>Brief Description</b>	<b>Stip.</b>	<b>Object</b>	<b>Rec'd</b>	<b>Reserved</b>	<b>Notes</b>
QLN0014	Limited Mining Operation Inspection report conducted September 27, 2022 <i>(DEQ – 82-84)</i>	Y				
QLN0015	Memorandum of Safety Concerns at Saratoga Mine (undated) <i>(DEQ – 85-88)</i>	Y				
QLN0016	Letter from Saratoga-Encampment-Rawlins Conservation District (undated) <i>(DEQ - 106)</i>	Y				
QLN0017	Memorandum of March 27, 2018 Meeting <i>(DEQ – 122-123)</i>	Y				
QLN0018	Emails re: Grading Plan for Subject Property <i>(DEQ – 125-152)</i>	Y				
QLN0019	Notice of Increase in Bond Amount for Subject Limited Mining Operation <i>(DEQ - 153)</i>	Y				
QLN0020	Reiman Corp. Invoicing and diagrams <i>(DEQ – 160-163)</i>	Y				
QLN0021	Emails re: site development plan, including site development plan (dated Aug. 31, 2022)	Y				
DEQ 1	DEQ's Reclamation Plan Cost Estimate for LMO 1496ET (date: 6/19/2023)	Y				
DEQ 2	Annual Inspection Report of LMO 1496ET for 2012 (date: 10/12/2012)	Y				
DEQ 3	Annual Inspection Reports of LMO 1496ET for 2013, 2014, and 2015 (date: 2/18/2016)	Y				
DEQ 4	Annual Inspection Reports of LMO 1496ET for 2016, 2017, and 2018 (date: 6/4/2018)	Y				
DEQ 5	Inspection Reports of LMO 1496ET for June and July of 2018 (date: 1/25/2019)	Y				

<b>Exhibit No.</b>	<b>Brief Description</b>	<b>Stip.</b>	<b>Object</b>	<b>Rec'd</b>	<b>Reserved</b>	<b>Notes</b>
DEQ 6	Annual Inspection Report of LMO 1496ET for 2019 (date: 8/13/2019)	Y				
DEQ 7	Annual Inspection Report of LMO 1496ET for 2020 (date: 3/3/2021)	Y				
DEQ 8	Annual Inspection Report of LMO 1496ET for 2021 (date: 6/23/2021)	Y				
DEQ 9	Annual Inspection Report of LMO 1496ET for 2022 (date: 8/29/2022)	Y				
DEQ 10	State Mine Inspector Letter of Safety Concern at LMO 1496ET (date: 4/19/2018)	Y				
DEQ 13	DEQ communications to Randy Stevens regarding reclamation performance bond increase (date: 11/10/2020)	Y				
DEQ 14	Limited Mining Operations Permit for Quality Landscape & Nursery Inc (date: 11/17/2021)	Y				
DEQ 15	Notice of Violation, Docket No. 5970-19, LMO 1496ET (date: 9/20/2019)	Y				
DEQ 16	Letter from DEQ to Randy Stevens regarding Notice of Violation Docket No. 5970-19 (date: 4/22/2020)	Y				
DEQ 17	Email from Kendall Anderson to the Wyoming Attorney General's Office with the signed Settlement Agreement (date: 7/20/2020)	Y				
DEQ 18	Notice of Violation, Docket No. 6176-22, LMO 1496ET (date: 8/12/2022)	Y				
DEQ 19	One-Week Deadline Extension Notice to respond to Notice of Violation Docket No. 6176-22 (date: 10/3/2022)	Y				

<b>Exhibit No.</b>	<b>Brief Description</b>	<b>Stip.</b>	<b>Object</b>	<b>Rec'd</b>	<b>Reserved</b>	<b>Notes</b>
DEQ 20	Notice of Violation, Docket No. 6183-22, LMO 1496ET (date: 10/17/2022)	Y				
DEQ 22	Image of LMO 1496ET in 2013 (date: 7/11/2013)	Y				
DEQ 23	Image of LMO 1496ET in 2014 (date: 7/8/2014)	Y				
DEQ 24	Image of LMO 1496ET in 2015 (date: 6/4/2015)	Y				
DEQ 25	Image of LMO 1496ET in 2016 (date: 2016)	Y				
DEQ 26	Image of LMO 1496ET in 2017 (date: 2017)	Y				
DEQ 27	Image of LMO 1496ET in 2018 (date: 2018)	Y				
DEQ 28	Notice of Violation, Docket No. 4271-08, LMO 1496ET (date: 5/15/2008)	Y				
DEQ 29	Notice of Violation, Docket No. 5990-19, LMO 1496ET (date: 12/23/2019)	Y				
DEQ 30	Notice of Violation, Docket No. 6044-20, LMO 1496ET (date: 8/24/2020)	Y				
DEQ 31	Notice of Violation, Docket No. 6063-20, LMO 1496ET (date: 12/16/2020)	Y				
DEQ 32	Notice of Violation, Docket No. 6064-20, LMO 1496ET (date: 12/16/2020)	Y				

❖ *Non-stipulated exhibits are: DEQ 11; DEQ 12; and DEQ 21*

DATED: July 18, 2023.

QUALITY LANDSCAPE & NURSERY, INC.  
Petitioner  
By:

/s/ James R. Salisbury

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James R. Salisbury, #6-3072  
THE SALISBURY FIRM, P.C.  
P.O. Box 1617  
Cheyenne, WY 82003  
Telephone: (307) 634-2002  
Facsimile: (307) 316-0500  
Email: [Jim@LawWyo.com](mailto:Jim@LawWyo.com)

COUNSEL FOR PETITIONER

STATE OF WYOMING  
By:

/s/ Shannon Leininger

---

D. David DeWald, #7-5538 (WY)  
Senior Assistant Attorney General  
Shannon Leininger, #8-6932 (WY)  
Assistant Attorney General  
WYOMING ATTORNEY GENERAL'S OFFICE  
109 State Capitol  
Cheyenne, WY 82002  
Telephone: (307) 777-7895  
Facsimile: (307) 777-3542  
Email: [david.dewald@wyo.gov](mailto:david.dewald@wyo.gov)  
[shannon.leininger@wyo.gov](mailto:shannon.leininger@wyo.gov)

COUNSEL FOR STATE OF WYOMING

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served on the 18<sup>th</sup> day of July, 2023, to the following via the method indicated below:

David DeWald  
Senior Assistant Attorney General

Shannon Leininger  
Assistant Attorney General

First Class Mail  
 Facsimile  
 Federal Express  
 Email – *EQC Portal*

STATE OF WYOMING  
OFFICE OF THE ATTORNEY GENERAL  
Water & Natural Resources Division

[David.DeWald@wyo.gov](mailto:David.DeWald@wyo.gov)  
[Shannon.Leininger@wyo.gov](mailto: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](mailto:todd.parfitt@wyo.gov)

First Class Mail  
 Facsimile  
 Federal Express  
 Email – *EQC Portal*

Kyle Wendtland  
Administrator – Land Quality Division  
STATE OF WYOMING  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
200 West 17<sup>th</sup> Street  
Cheyenne, WY 82002  
[kyle.wendtland@wyo.gov](mailto:kyle.wendtland@wyo.gov)

First Class Mail  
 Facsimile  
 Federal Express  
 Email – *EQC Portal*

*/s/ Kendall Anderson*  
\_\_\_\_\_  
OF THE SALISBURY FIRM, P.C.