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Attorneys for Petitioner Protect Our Water Jackson Hole

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

In the Matter of the Appeal of)
Protect Our Water Jackson Hole)
From Permit to Construct –)
Permit No. 2023-025) Docket No. 23-3801

RESPONSE TO BASECAMP’S MOTION TO INTERVENE

Petitioner Protect Our Water Jackson Hole (“**POWJH**”) takes no position on Basecamp Teton WY SPV LLC’s (“**Basecamp’s**”) *Motion to Intervene*. POWJH would highlight that Basecamp fails to identify any concrete new argument it would actually proffer in the underlying cases, despite the fact a number of issues are actually pending. POWJH’s position, however, is that Basecamp’s intervention would moot any claim that Basecamp was denied adequate process and that the challenged permit is facially invalid and will ultimately be revoked regardless of

Basecamps participation. POWJH, therefore, will not be unduly prejudiced by Basecamp's intervention, provided such intervention does not lead to undue delay in the proceedings.

Respectfully submitted this November 14, 2023.



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Certificate of Service

Based on the foregoing signature, counsel certifies that a true and correct copy of motion was electronically filed with the Environmental Quality Council and was served on all parties via the Environmental Quality Council's electronic notification.