

FILED

AUG 30 1982

Ardelle M. Kissler, Clerk
Environmental Quality Council

BEFORE THE

ENVIRONMENTAL QUALITY COUNCIL

IN THE MATTER OF)
GETTY OIL COMPANY)
APPLICATION FOR)
SELF-BOND)

APPEAL AND REQUEST FOR HEARING

On March 22, 1982, Getty Oil Company (Getty) filed an application for a self-bond for reclamation of the Petrotomics surface uranium mine at Shirley Basin, Wyoming. Getty is currently operating pursuant to Permit No. 342. The self-bond application was supplemented by a letter dated June 21, 1982 addressing questions raised by the Land Quality Division (LQD). On July 1, 1982, Walter C. Ackerman, Administrator of the LQD, denied Getty's request for approval of a self-bond.

Pursuant to W.S. §35-11-112, Getty hereby appeals the LQD decision denying its application for self-bond approval and requests that the Environmental Quality Council (EQC) hold a de novo hearing to consider the application. Further, Getty requests that the EQC reverse the decision of the Administrator and approve the self-bond application.

As grounds for this Petition, Getty states and alleges as follows:

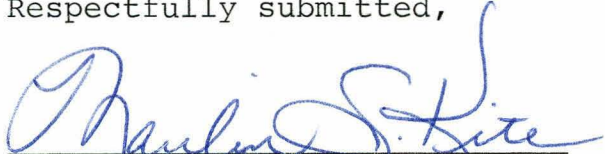
1. The application demonstrates that Getty has a history of financial solvency and continuous operation in the State of Wyoming as required by W.S. §35-11-417(d).
2. The application identifies a suitable agent for the service of process as required by W.S. §35-11-417(d).
3. The application includes the information required

c: LQD (W. Ackerman) 8-31-82.ak.

by Chapter XII of the LQD Rules and Regulations.

NOW, THEREFORE, Getty requests that the EQC hold a de novo hearing and approve the self-bond application.

Respectfully submitted,


MARILYN S. KITE
Holland & Hart

CERTIFICATE OF SERVICE


I, Marilyn S. Kite, certify that on the 30th day of August, 1982, I served a copy of the Appeal and Request for Hearing by depositing copies of the same in the United States mail, postage prepaid, duly enveloped and addressed to:

Mr. Walter C. Ackerman
Administrator, Land Quality Division
Department of Environmental Quality
Equality State Bank Building
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Mr. Robert Sundin
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MARILYN S. KITE
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