

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

In the Matter of the Appeal)
of the Renewal Bond Amount for) EQC Docket No. 16-4601
Bentonite Mining Permit No. 624)

**PETITIONER'S TRAVERSE TO
DEQ'S MOTION TO DISMISS**


COMES NOW, Good Bentonite Company, LLC, Petitioner, by and through its attorney,
Heather A. Jacobson, Jacobson Law Office, LLC, and respectfully submits this Petitioner's
Traverse to DEQ'S Motion to Dismiss. In support of this Traverse, Petitioner submits the
attached Memorandum in Support of Petitioner's Traverse to DEQ'S Motion to Dismiss.

WHEREFORE Petitioner prays that the Council issue an Order Denying DEQ's Motion
to Dismiss and for such other and further relief as the Court may find just and equitable.

DATED this 8 day of June, 2016.

Good Bentonite Company, LLC,
Petitioner

By:


Heather A. Jacobson, WSB # 6-3648
Attorney for Petitioner
Jacobson Law Office, LLC
204 N. 5th St.
Douglas, WY 82633
Phone: (307) 358-3180
Fax: (307) 358-3182

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above foregoing
Petitioner's Traverse to DEQ'S Motion to Dismiss was filed electronically with the Wyoming
Environmental Quality Council's online docket system and served electronically through that
system to the following:

Todd Parfitt
Director, DEQ
Todd.parfitt@wyo.gov

Andrew J. Kuhlmann
Senior Assistant Attorney General
Andrew.kuhlmann@wyo.gov

Office of Council
122 West 25th St., Room 1714
Herschler Building
Cheyenne, WY 82002

