

present expert testimony regarding the mine permit application process or the technical components of the mine plan and the reclamation plan, Mr. Barron is qualified to provide such testimony and may be called as an expert witness. Mr. Barron has worked with various mines in filing several components of mine permits, currently on file with the Wyoming Department of Environmental Quality. Mr. Barron has assisted with non-substantial revisions and major revisions alike. Given Mr. Barron's education and experience, he may also be asked to provide expert opinions relating to the topics of ground water and surface water, as well as geotechnical engineering.

David Myers
Natural Resources Analyst
Wyoming Department of Environmental Quality

Brook may call Mr. Myers to testify as an expert in this matter. Mr. Myers is a Natural Resources Analyst at DEQ and has experience and expertise in surface water hydrology. If called, Mr. Myers may testify about: 1) hydrology relating to the technical adequacy and statutory compliance of Brook's mine permit; 2) the status of Big Horn Coal Co.'s reclamation efforts; 3) Big Horn Coal Co.'s remaining reclamation obligations; 4) the process for establishing a reclamation performance bond before issuing a permit; and 5) the authenticity of the Department's records for Big Horn Coal Co.

Bjarne Kristiansen
Assistant Supervisor, District III
Wyoming Department of Environmental Quality

Brook may call Mr. Kristiansen to testify as an expert in this matter. Mr. Kristiansen is a professional geologist in Wyoming as is the Assistant Supervisor, District III, at DEQ. Mr. Kristiansen has experience and expertise in geology, overburden assessment, hydrology, and alluvial valley floors. If called, Mr. Kristiansen may testify about: 1) the authenticity of the

Department's records for Brook Mine; 2) the process for establishing a surface damages bond and reclamation performance bond before issuing a permit; 3) Brook's statutory compliance with the subsidence control plan; 4) Brook's statutory compliance for hydro-geology; and 5) the general statutory compliance and technical adequacy of the Brook mine permit.

Stacy Page
Former Assistant Supervisor, District III
Wyoming Department of Environmental Quality

Brook may call Ms. Page to testify as an expert in this matter. Ms. Page was the Assistant Supervisor, District III, at DEQ and has experience and expertise in baseline vegetation and reclamation. If called, Ms. Page may testify about: 1) Brook's statutory compliance with vegetation studies within the permit and 2) the general statutory compliance and technical adequacy of the Brook mine permit.

Doug Emme
Blasting Program Principal
Wyoming Department of Environmental Quality

Brook may call Mr. Emme to testify as an expert in this matter. Mr. Emme is the Blasting Program Principal at DEQ and has experience and expertise in blasting and overburden removal as well as blasting program compliance. If called, Mr. Emme may testify about: 1) Brook's statutory compliance with blasting and 2) the general statutory compliance and technical adequacy of the Brook mine permit.

Jaime Jakes n/k/a Henderson
Natural Resources Analyst
Wyoming Department of Environmental Quality

Brook may call Ms. Henderson to testify as an expert in this matter. Ms. Henderson is a Natural Resources Analyst and has experience and expertise in baseline vegetation and reclamation. If called, Ms. Henderson may testify about: 1) Brook's statutory compliance with

vegetation studies within the permit and 2) the general statutory compliance and technical adequacy of the Brook mine permit.

Matt Kunze
Surface Water Hydrologist
Wyoming Department of Environmental Quality

Brook may call Mr. Kunze to testify as an expert in this matter. Mr. Kunze is a Surface Water Hydrologist at DEQ and has experience and expertise in surface water hydrology, baseline compliance, and mine plan/reclamation plan compliance. If called, Mr. Kunze may testify about: 1) Brook's statutory compliance with alluvial valley floor studies; 2) Brook's statutory compliance with surface water studies; and 3) the general statutory compliance and technical adequacy of the Brook mine permit.

Muthu Kuchanur
Land Quality Geology Supervisor
Wyoming Department of Environmental Quality

Brook may call Mr. Kuchanur to testify as an expert in this matter. Mr. Kuchanur is the Land Quality Geology Supervisor at DEQ and has experience and expertise in geology, hydrogeology, and groundwater. If called, Mr. Kuchanur may testify about: 1) Brook's statutory compliance with geology studies; 2) Brook's statutory compliance with groundwater studies; 3) Brook's statutory compliance with surface water studies; and 4) the general statutory compliance and technical adequacy of the Brook mine permit.

ADDITIONAL COMMENTS RELATING TO BROOK'S DESIGNATION

1. Brook reserves the right to call, without further notice, any expert witness, whether retained or non-retained, designated by any other party to this action or identified in any manner pursuant to the Wyoming Rules of Civil Procedure as if he or she were its own.

2. Brook expressly reserves the right to call to testify at the hearing any and all additional non-retained witnesses who qualify, or who may qualify, as experts who are identified in written discovery responses and/or documents produced by any party or non-party to this matter, as well as any person deposed and/or identified during the depositions of witnesses taken or yet to be taken in this matter.

3. Brook reserves the right to designate any and all witnesses necessary for rebuttal or for counter testimony to any other parties' designated experts.

4. Brook reserves the right to object to any expert listed by any other party to this matter on the basis of relevance, or otherwise.

5. In the event any of Brook's listed experts are unavailable to testify in person at the trial in this matter, Brook reserves the right to use parts or all of the depositions or videotaped depositions of any or all of these expert witnesses at trial, in lieu of the witnesses' actual live testimony.

6. Brook reserves the right, as this case develops, to name additional expert witnesses if the need arises or to expand on the areas and subjects listed above.

DATED: March 17, 2017.



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CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2017, I served a true and correct copy of the foregoing by email to the following:

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