

EXHIBIT A

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Attorneys for Bentonite Performance
Minerals, LLC

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

**IN RE BENTONITE PERFORMANCE) DOCKET 18-1601
MINERALS LLC)**

NOTICE OF DEPOSITION DUCES TECUM OF MR. RONALD ERICSSON

Pursuant to the Wyoming Rules of Civil Procedure, counsel for Petitioner Bentonite Performance Minerals, LLC (BPM) will take the deposition of Mr. Ronald Ericsson, manager of 2U Ranch, LLC, 426 Lonesome Country Road, Alzada, Montana 59311, at the date and time indicated below:

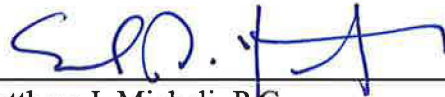
DEPONENT	DATE	TIME
Ronald Ericsson	November 19, 2018	9:00 a.m. MST

The deposition will be conducted in the meeting room of the Sundance State Bank building, located at 207 North Second Street, Sundance, Wyoming. The deposition will be taken before and recorded by a certified court reporter and notary public and will continue until completed. The deposition will be taken in accordance with the Wyoming Rules of Civil Procedure and may be used for all purposes as provided by the rules. The deponent is requested to bring the responsive documents identified on the **Exhibit A** attached to this Notice of Deposition Duces Tecum.

EXHIBIT A

Please advise at your earliest convenience as to whether there exists a conflict with the proposed deposition date, time, or location, or whether a different date, time, or location is preferred by you. Counsel for BPM will work with you, to the extent possible, to limit burdens associated with appearing for this deposition and producing responsive documents.

DATED this 5th day of November 2018.



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ATTORNEYS FOR PETITIONER
BENTONITE PERFORMANCE
MINERALS, LLC

CERTIFICATE OF SERVICE

I certify that on November 5, 2018 I served a copy of the foregoing document to the following by email and certified mail:

2U Ranch, LLC
c/o Ronald Ericsson
426 Lonesome Country Road
Alzada, Montana 59311
ericsson@childselect.com

and by email:

Jim Ruby
Executive Secretary, Wyoming Environmental Quality Council
122 W. 25th Street
Herschler Building 1W, Room 1714
Cheyenne, WY 82001
jim.ruby@wyo.gov

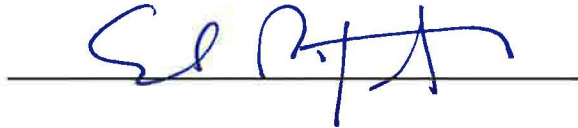
A handwritten signature in blue ink, appearing to read "Jim Ruby", is written over a horizontal line.

EXHIBIT A

You are commanded to produce at deposition the documents, books, papers, and other tangible things identified below, in accordance with the following instructions and definitions:

INSTRUCTIONS FOR USE AND DEFINITIONS

1. The terms “you” and “your” means 2U Ranch, LLC and its predecessor-in-interest Lonesome Country Limited.
2. The term “BPM” means Bentonite Performance Minerals, LLC.
3. The term “Subject Lands” means those surface lands owned by you and being described as follows:

Township 57 North, Range 62 West, 6th P.M.

Section 30: Lots 18 and 19

Section 31: Lots 3, 4, 5, 6, 7, 11, 12, 13, S/2NE/4, and SE/4NW/4

Section 32: Lot 3 and SW/4NW/4

Being approximately 608.66 acres and located in Crook County, Wyoming.

4. The term “Lease 0-42804” means BPM’s June 2, 2011 bentonite lease agreement by and between BPM and the State of Wyoming, granting BPM the right to explore and develop the bentonite deposits underlying the Subject Lands.
5. The term “Proposed Mining Operations” means the bentonite surface mining and reclamation operations proposed for Lease 0-42804 and affecting the Subject Lands, as described and detailed in the Mine and Reclamation Plans.
6. The term “documentation” is intended to include but are not necessarily limited to the following: billing statements, telephone call records, files, notes, calculations, emails, memoranda, drafts, correspondence or letters of any kind, intradepartmental or office communications, voice recordings, written statements of reports, either signed or unsigned, agreements, contracts, leases, records, computer printouts, magnetic tapes, disks, diskettes or other machine readable information storage devices.
7. The term “evidencing” means and includes: with respect to, referring to, relating to, embodying, establishing, comprising, connected with, commented on, responding to, showing, describing, documenting, supporting, mentioning, analyzing, reflecting or representing, pertaining to, whether or in whole or in part, or directly or indirectly.
8. All documentation is to be divulged which is in your possession or that of your attorneys, investigators, lessees, agents, employees or other representatives.

DOCUMENTS TO BE PRODUCED AT DEPOSITION

1. All documentation evidencing existing uses of the Subject Lands that you allege will be adversely impacted by the Proposed Mining Operations, including but not limited to grazing, hunting, planting and harvesting of crops, haying, ranching operations, logging operations, and use of water resources.
2. All documentation evidencing existing uses by third parties of the Subject Lands, including but not limited to grazing leases, hunting leases, road use agreements, right of way agreements, and haying agreements.
3. All documentation evidencing the type and yield of any vegetation utilized for livestock grazing on the Subject Lands by you or a third party.
4. All documentation evidencing the type and yield of crops planted and harvested from the Subject Lands by you or a third party, including but not limited to grasses, legumes, and other herbaceous plants planted and harvested for purposes of haying operations.
5. All documentation evidencing the use of the Subject Lands for ranching operations by you or a third party, including but not limited to the types, varieties, and numbers of livestock utilizing the Subject Lands.
6. All documentation evidencing the use of the Subject Lands for logging operations, including but not limited to the types, varieties, and quantities of trees planted and harvested from the Subject Lands by you or a third party.
7. All documentation evidencing existing improvements to the Subject Lands, including but not limited to buildings, fences, and roads, that you allege will be impacted by the Proposed Mining Operations.
8. The May 24, 2018 certified letter, together with the enclosed mine and reclamation plans, mailed by BPM to you and requesting your consent to the Proposed Mining Operations, together with any documentation evidencing a response from you to BPM.