

Isaac N. Sutphin (Wyo. State Bar #6-3711)
Jeffrey S. Pope (Wyo. State Bar # 7-4859)
HOLLAND & HART LLP
2515 Warren Avenue, Suite 450
P.O. Box 1347
Cheyenne, WY 82003-1347
Telephone: (307) 778-4200
insutphin@hollandhart.com
jspope@hollandhart.com

ATTORNEYS FOR CONTURA COAL WEST, LLC

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

IN RE CONTURA COAL WEST, LLC –)
PT0214)
)
)
)

Docket No.18-4803
Consolidated with 18-4805

**CONTURA’S UNOPPOSED MOTION FOR ENTRY OF STIPULATED PROTECTIVE
ORDER**

Contura Coal West, LLC (Contura) requests the entry of a Protective Order governing the confidentiality of hearing and discovery materials.

1. Rule 26 provides the Council may enter a protective order specifying terms or conditions of discovery, and requiring that trade secret or other confidential research, development or commercial information not be revealed, or be revealed only in a specified way. Wyo. R. Civ. P. 26(c)(1).
2. This case will involve the disclosure of confidential and proprietary information during discovery and hearings. Specifically, Contrua and/or Blackjewel may disclose information and data such as reserves, property ownership, and other confidential interests as part of an appraisal.

3. The unfettered disclosure of confidential and proprietary information would cause serious harm to Contura and/or Blackjewel's businesses.

4. Contura therefore requests an order designating the way such confidential information will be produced, maintained, reviewed, and disposed of at the conclusion of this litigation.

5. Counsel for Contura has conferred with counsel for all other parties, none oppose this motion.

WHEREFORE, Contura respectfully requests that the Council grant this unopposed motion and enter the attached Stipulated Protective Order.

DATED: March 1, 2019.

/s/ Jeffrey S. Pope

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LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2019, I served the foregoing by placing a true and correct copy thereof in the United States mail, postage prepaid and properly addressed to the following:

Shannon Anderson
Powder River Basin Resource Council
934 N. Main Street
Sheridan, WY 82801

James Kaste, Deputy Attorney General
Wyoming Attorney General's Office
Pioneer Building, 2nd Floor
2424 Pioneer Avenue
Cheyenne, WY 82002

S. Thomas Throne
Jason D. Wasserburger
Thorne Law Office, P.C.
P.O. Box 6590
Sheridan, WY 82801

Bernard Haggerty, Hearing Examiner
State of Wyoming
Office of Administrative Hearings
2020 Carey Avenue, Fifth Floor
Cheyenne, WY 82002-0270

/s/ Jeffrey S. Pope
