

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

**IN THE MATTER OF BLACK HILLS)
BENTONITE PERMIT TO MINE NO. 248C) Docket No. 24-1601
MURPHY CREEK UPDATE AREA)**

**FINDINGS OF FACT, CONCLUSIONS OF LAW, AND
ORDER DENYING BLACK HILLS BENTONITE'S REQUEST
FOR AN ORDER IN LIEU OF SURFACE OWNER CONSENT**

The final contested case hearing in this matter occurred before the Environmental Quality Council on August 15, 2024, in the conference room of the Hathaway Building, 2300 Capitol Avenue, Cheyenne, Wyoming.

I. APPEARANCES

Present for the Council was Council member and Hearing Officer Ryan Greene. Also present were Chairman Shane True, Vice-Chairman J.D. Radakovich, Secretary Marjorie Bedessem, and Council members Bill Stafford, Steve Lenz, and Stan Blake.

Present at the hearing representing Petitioner, Black Hills Bentonite, LLC was John A. Masterson, Kayla A. Albertson, and Patrick R. Tolley from Welborn Sullivan Meck & Tooley, P.C. Appearing on behalf of Respondent Landowners (also referred to as the Firnekases), Bruce and Betty Jean Firnekas, was Mitchell H. Edwards from Nicholas & Tangeman, LLC.

Present and testifying for Black Hills was Doug Gibson, Permit Supervisor for Black Hills and Larry Madsen, Managing Director for Black Hills. Black Hills also called landowner Bruce Firnekas who testified via telephone. Black Hills' exhibits A, B, C, D, E, F, H, I, J, and K were

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admitted into evidence. Firnekas's exhibits 1, 3, and 4 were admitted into evidence. The Firnekases did not call any witnesses.

Immediately following the evidentiary hearing, the Council conducted deliberations but ultimately continued its deliberations to a later date. Following the receipt of the transcript, on October 23, 2024, the Council completed its deliberations during a public meeting. The Council, having heard and considered all the evidence in this case and being fully advised, pursuant to the Wyoming Administrative Procedure Act, Wyo. Stat. Ann. § 16-3-110, finds and concludes (by a 6-1 vote¹) that Black Hills' request for an order in lieu of surface owner consent shall be denied because Black Hills failed to prove by a preponderance of the evidence that it had satisfied all of the elements required in Wyo. Stat. Ann. § 35-11-406(b)(xii)(A)-(D).

II. JURISDICTION

This case arises from Black Hills' request to the Council for the issuance of an order in lieu of surface owner consent. Black Hills was unable to obtain surface owner consent from the Landowners for its mining and reclamation plans. Under Wyo. Stat. Ann. § 35-11-406(b)(xii), if consent cannot be obtained, Black Hills may request a hearing before the Council and request an order in lieu of consent. This matter is properly before the Council and the Council has jurisdiction over this matter and the parties.

III. STATEMENT OF THE CASE/ISSUES AND CONTENTIONS

Black Hills contends that the main issue for the Council to decide is whether it has the right to enter upon and mine bentonite on Landowners' land without Landowners' consent or an order in lieu of consent. Black Hills alleges that it is currently allowed to enter upon Landowners' land

¹ Council member Stafford voted against the motion.

and mine bentonite without needing Landowners' consent or permission because of Black Hills' rights outlined in duly recorded land records. Essentially, Black Hills asserts that the statutory process outlined in § 35-11-406(b)(xii) is not applicable because it does not need Landowners' consent because of the language in the recorded land records.

Second, Black Hills contends that if a statutory process applies to this case, the Council must decide whether Black Hills has satisfied the four elements outlined in § 35-11-406(b)(xii)(A)-(D).² Under that statute, if consent cannot be obtained from a surface owner as to the mining plan and reclamation plan, the Council shall issue an order in lieu of consent if it finds the following four elements:

(A) That the mining plan and the reclamation plan have been submitted to the surface owner for approval;

(B) That the mining plan and the reclamation plan is detailed so as to illustrate the full proposed surface use including proposed routes of egress and ingress;

(C) That the use does not substantially prohibit the operations of the surface owner;

(D) The proposed plan reclaims the surface to its approved future use, in segments if circumstances permit, as soon as feasibly possible[.]

....

Wyo. Stat. Ann. § 35-11-406(b)(xii)(A)-(D).

Landowners contend that the main issue for the Council to decide is whether Wyo. Stat. Ann. § 35-11-406(b)(xi) or (xii) applies, and if (xii) applies, whether Black Hills satisfied the four elements in (b)(xii)(A)-(D).

² Because Black Hills' mining operation on the land is not a surface coal mining operation, (xii)(E) does not apply.

The Landowners allege that (xi) applies because they are a “resident or agricultural landowner.” “Resident or agriculture landowner” means a natural person or persons who, or a corporation of which the majority stockholder or stockholders:

(A) Hold legal or equitable title to the land surface directly or through stockholdings, such title having been acquired prior to January 1, 1970, or having been acquired through descent, inheritance or by gift or conveyance from a member of the immediate family of such owner; and

(B) Have their principal place of residence on the land, or personally conduct farming or ranching operations upon a farm or ranch unit to be affected by the surface mining operation, or receive directly a significant portion of their income from such farming or ranching operations.

Wyo. Stat. Ann. § 35-11-406(b)(xi). Landowners claim that because they are a “resident or agricultural landowner,” the Council cannot issue an order in lieu of consent because the “in lieu of consent” alternative is not available under that section—according to Landowners, if section (xi) applies, they have an absolute veto power. In other words, Landowners contend that the Council is without statutory authority to issue an order in lieu of consent in situations where a landowner is a “resident or agricultural landowner.”

Alternatively, Landowners claim that if the Council concludes that they are not a “resident or agricultural landowner,” the Council cannot issue an order in lieu of consent because Black Hills has not met all four elements in (xii)(A)-(D).

This dispute centers on whether Wyo. Stat. Ann. § 35-11-406(b)(xi) or (b)(xii) applies which requires the Council to first determine if Black Hills has proven that the Landowners are not a “resident or agricultural landowner.” If the Council concludes that Black Hills has met its

burden on that issue, then the Council must determine if Black Hills has proven that it has satisfied the four elements required for an “order in lieu of consent” under (b)(xii).

Although Black Hills is requesting the Council to decide whether it needs Landowners’ consent based upon the duly recorded land records, it is not within the Council’s authority to decide whether the duly recorded land records allow Black Hills to enter upon Landowners’ land and mine bentonite without needing Landowners’ consent as outlined in § 35-11-406(b)(xi) or (xii). The Council is not statutorily authorized to decide that issue—the Council is required to follow the statutory process outlined in § 406(b)(xi) and (xii). In sum, the Council is without the legal authority to step outside the statutory process outlined in § 406(b)(xi) and (xii) and determine whether duly recorded land records provide an exception to the statutory order in lieu of consent process.³

IV. FINDINGS OF FACT⁴

1. On August 24, 2021, Black Hills provided its mining and reclamation plans to Bruce and Betty Firnekas concerning Black Hills’ plans to mine bentonite on their land more particularly described as Lots 1-4 and the S1/2N1/2 of Section 1, Township 41, North, Range 83 West (hereinafter referred to as the “land” or “property”). The property consists of 320 acres and is a split estate, whereby the mineral estate owners are different from the surface estate owners.

³ It appears Black Hills understood this because in its petition seeking a contested case before the Council, Black Hills stated that “[d]espite the efforts of BHB [Black Hills] to come to terms on an acceptable surface use agreement and to establish a good working relationship, the Firnekases have refused to consent to the surface use by BHB. Thus, making it necessary for BHB to file this Petition with the Environmental Quality Council seeking an Order in Lieu of Landowner Consent under Wyo. Stat. § 35-11-406(b)(xii).” *See* Petition to the Environmental Quality Council for Order in Lieu of Landowner Consent, ¶ 17.

⁴ To the extent testimony is cited as the basis for a finding of fact, the Council has resolved any conflicts or disputes between testimony of others in favor of the cited testimony.

Bruce and Betty Firnekas are owners of the surface estate while Black Hills owns the mineral estate. (Transcript – Firnekas testimony, 36, 40, 43; Gibson testimony, 107; Black Hills’ Ex. H; Firnekas’s Ex. 3, 4; *see also* Black Hills’ and Landowners’ stipulated facts in the prehearing disclosure statements).

2. At the same time as submitting the mining and reclamation plans to the Firnekases, Black Hills sought surface owner consent from them. The Firnekases never provided their consent to Black Hills. (Transcript – Firnekas testimony, 40, 49, 53-54; Black Hills’ Ex. H).

3. The Firnekases acquired title to the surface estate of the land through descent, inheritance, or by gift or conveyance from a member of their immediate family. Bruce Firnekas’s father, Church Firnekas, acquired the land in 1962. In 1967, Church conveyed the land to his son Chester Firnekas. Chester conveyed the property to him and his brother, Bruce Firnekas, as joint tenants with rights of survivorship in 2001. Chester and Bruce conveyed the land to Bruce and his wife, Betty Jean in 2013. (Transcript – Firnekas testimony, 39; Firnekas’s Ex. 1; *see also* Black Hills’ and Landowners’ stipulated facts in the prehearing disclosure statements).

4. No one lives on the land, including the Firnekases. (Transcript – Firnekas testimony, 37-38).

5. There are no structures on the land. (Transcript – Firnekas testimony, 38).

6. The Firnekases last visited the land about a year ago. (Transcript – Firnekas testimony, 38).

7. The Firnekases do not personally run cattle on the land and do not personally herd, brand, deliver, or pick up cattle on the land. In fact, the Firnekases own only one cow. The Firnekases are not involved in the cattle business; however, they allow the Firnekas Ranch to run

cattle on the land. The Firnekases do not have any interest, financial or otherwise, in the Firnekas Ranch. The Firnekas Ranch is owned by Bruce Firnekas's nephew and his son. The Firnekases have a verbal agreement with the Firnekas Ranch which allows the Ranch to use the land. There is no holding facility on the land as branding and pickup/delivery are not normally done on the land. In addition to this land, the Ranch also utilizes other property to graze its cattle. The Ranch does not pay the Firnekases for its use of their land. (Transcript – Firnekas testimony, 42-45, 47, 59).

8. The Firnekases only receive income from their pension and social security. (Transcript – Firnekas testimony, 48).

9. Black Hills plans to mine the bentonite by utilizing surface mining whereby a sequence of small excavated areas or pits, typically less than five acres in size, are developed to expose and remove the underlying bentonite deposits. Due to the shallow depth of the bentonite deposit, the deepest portion of the pits will typically not exceed fifty feet. No explosive or blasting agents will be used. (Transcript – Gibson testimony, 82-84; Firnekas testimony, 45; Landowners' Ex. 3).

10. Typically, the pits are designed in a sequence where each pit is adjoining, allowing for a multiple-cut, direct-backfill sequence. As the excavation of each pit progresses through the sequence, overburden removed from each advancing pit is directly placed (direct-backfill) in the previous open pit. Mining in this sequence allows for reclamation to occur concurrent with each new pit being developed in the advancing sequence. (Landowners' Ex. 3).

11. Black Hills' mining plan generally describes: 1) the type of mining activities and operations, 2) the life of the mining activities, 3) the equipment and machinery used for mining

and reclamation, 4) the mining method and schedule, 5) the topsoil removal and handling, 6) the mine pit excavation, backfilling, and contouring, 7) the bentonite removal, handling, and processing, 8) and other items such as mining hydrology, refuse disposal, and public nuisance and safety. (Landowners' Ex. 3; *see also* Black Hills' Ex. F).

12. Although the mine plan specifically references the pits, the overburden and topsoil stockpiles, and the access/haul roads, the plan does not illustrate the location of the pits, stockpiles, and access/haul roads on the land. The mine plan map is the document that identifies and illustrates the pits, stockpiles, and access/haul roads on the affected land. Mine plans are general in nature while the associated mine plan maps are detailed—the maps are the most important part. (Landowners' Ex. 3; *see also* Black Hills' Ex. F; transcript – Gibson testimony, 64-65, 89-90).

13. Black Hills' reclamation plan explains how it will restore the disturbed areas to the pre-mining land use of livestock grazing and wildlife habitat. Specifically, the plan generally discusses: 1) the contouring plans for the affected lands, 2) the surface preparation for topsoil replacement, 3) topsoil replacement and handling, 4) revegetation practices, 5) reclamation success criteria, 6) hydrologic restoration, 7) the reclamation schedule, and 8) the reclamation cost estimates and bonding. Under the plan, reclamation of disturbed areas will begin as soon as possible, and all attempts will be made to assure that reclamation occurs concurrently with the mining activities. (Landowners' Ex. 4; transcript – Firnekas testimony, 46).

14. Black Hills, as part of its mining operations, has been successful in working with livestock owners and their grazing operations with minimal problems. Black Hills generally works with the livestock owner to see what their preferences are. (Transcript – Gibson testimony, 80-81; Madsen testimony, 120-121).

15. Access to the land from Casper is via the TTT Ranch exit onto the Lone Bear Road off of Interstate Highway 25, between Casper and Kaycee. From the Lone Bear Road, the land can be accessed from the existing Murphy Creek haul road. (Landowners' Ex. 3).

16. In 2024, Black Hills subsequently revised the original mine plan that it sent to the Landowners in 2021 after dialogue with the Department of Environmental Quality. The revisions reduced the original 2021 mine plan from twenty-two pages to seventeen pages. The revised mine plan included less detail about the pits (topsoil and overburden movement) and two items were added. The revised mine plan included specifics regarding sage-grouse so there were sentences that explained Black Hills would not disturb topsoil during breeding and nesting seasons which are from March to June. In addition, the revised mine plan included a provision that Black Hills would not make any noise from 8:00 p.m. to 6:00 a.m. The revised mine plan was ultimately submitted to the Department which it approved in July 2024. (Transcript – Gibson testimony, 72-74, 85-88, 91, 115).

17. Black Hills never submitted the revised mine plan to the Firnekases. (Transcript – Gibson testimony, 86-87).

18. When Black Hills provides mine and reclamation plans to landowners for consent, Black Hills generally includes the pertinent maps such as the mine plan map and reclamation plan map. (Transcript – Gibson testimony, 89-90).

19. It's important to include the relevant maps because the maps are the documents that contain the necessary details of the mining and reclamation on the affected property. The maps are the most important part of the mining and reclamation plans. Typically, the plans are general

while most of the specific information is identified and illustrated in the maps. (Transcript – Gibson testimony, 89-90, 101, 103, 116-117).

20. Black Hills does not recall if it provided the relevant maps to the Firnekases. The August 2021 letter from Black Hills sending the plans to the Firnekases does not reference the maps. (Transcript – Gibson testimony, 89-90, 116; Black Hills’ Ex. H).

V. CONCLUSIONS OF LAW

A. Principles of Law

21. Paragraphs 1 through 20 of the findings of fact are fully incorporated herein.

22. This matter is properly before the Council upon Black Hills’ petition for an order in lieu of consent under Wyo. Stat. Ann. § 35-11-406(b)(xii).

23. Wyoming Statute § 35-11-406(b)(xii) provides that:

(xii) For any application filed after March 1, 1975, including any lands privately owned but not covered by the provisions of paragraph (b)(xi) of this section an instrument of consent from the surface landowner, if different from the owner of the mineral estate, to the mining plan and reclamation plan. If consent cannot be obtained as to the mining plan or reclamation plan or both, the applicant may request a hearing before the environmental quality council. The council shall issue an order in lieu of consent if it finds:

(A) That the mining plan and the reclamation plan have been submitted to the surface owner for approval;

(B) That the mining plan and the reclamation plan is detailed so as to illustrate the full proposed surface use including proposed routes of egress and ingress;

(C) That the use does not substantially prohibit the operations of the surface owner;

(D) The proposed plan reclaims the surface to its approved future use, in segments if circumstances permit, as soon as feasibly possible;

....

Wyo. Stat. Ann. § 35-11-406(b)(xii)(A) through (D).

24. Wyoming Statute § 35-11-406(b)(xi) provides that:

(xi) For an application filed after March 1, 1975, an instrument of consent from the resident or agricultural landowner, if different from the owner of the mineral estate, granting the applicant permission to enter and commence surface mining operation, and also written approval of the applicant's mining plan and reclamation plan. As used in this paragraph "resident or agricultural landowner" means a natural person or persons who, or a corporation of which the majority stockholder or stockholders:

(A) Hold legal or equitable title to the land surface directly or through stockholdings, such title having been acquired prior to January 1, 1970, or having been acquired through descent, inheritance or by gift or conveyance from a member of the immediate family of such owner; and

(B) Have their principal place of residence on the land, or personally conduct farming or ranching operations upon a farm or ranch unit to be affected by the surface mining operation, or receive directly a significant portion of their income from such farming or ranching operations.

Wyo. Stat. Ann. § 35-11-406(b)(xi).

25. When analyzing the language of a statute, the "paramount consideration is the legislature's intent as reflected in the plain and ordinary meaning of the words used in the statute." *Horse Creek Conservation Dist. v. State ex rel. Wyo. Att'y Gen.*, 2009 WY 143, ¶ 14, 221 P.3d 306, 312 (Wyo. 2009) (citing *Krenning v. Heart Mountain Irrigation Dist.*, 2009 WY 11, ¶ 9, 200 P.3d 774, 778 (Wyo. 2009)). "A statute is clear and unambiguous if its wording is such that reasonable persons are able to agree on its meaning with consistency and predictability." *Id.* "When a statute is sufficiently clear and unambiguous, we give effect to the plain and ordinary meaning of the words and do not resort to the rules of statutory construction." *Cheyenne Newspapers, Inc.*

v. Building Code Bd. of App. of City of Cheyenne, 2010 WY 2, ¶ 9, 222 P.3d 158, 162 (Wyo. 2010) (quoting *BP Am. Prod. Co. v. Dep't of Revenue*, 2005 WY 60, ¶ 15, 112 P.3d 596, 604 (Wyo. 2005)).

26. The general rule in administrative law is that, unless a statute otherwise assigns the burden of proof, the proponent of an order has the burden of proof. *JM v. Department of Family Services*, 922 P.2d 219, 221 (Wyo. 1996). The normal standard of proof in administrative hearings is the preponderance of the evidence standard. *Id.* at 223.

27. In this case, Black Hills, the proponent of the order in lieu of consent, has the burden of proof and the standard of proof is the preponderance of the evidence. Black Hills has the burden to prove that § 406(b)(xii) is the appropriate statute in this case which requires Black Hills to prove that (b)(xi) does not apply. If Black Hills proves that (xi) does not apply, Black Hills has the burden of proof to show by a preponderance of the evidence that it satisfied the four elements in § 406(b)(xii)(A)-(D).

B. Applications of Principles of Law

28. The Council finds and concludes that it has jurisdiction over this matter under Wyo. Stat. Ann. § 35-11-406(b)(xii).

29. As part of Black Hills' petition for an order in lieu of consent, the Council must determine whether Black Hills has proven, by a preponderance of the evidence, that Landowners are not "resident or agricultural landowners" under Wyo. Stat. Ann. § 35-11-406(b)(xi). If the Council determines that Landowners are not "resident or agricultural landowners" under (xi), the Council must then decide whether Black Hills has proven by a preponderance of the evidence that it satisfied the four elements in Wyo. Stat. Ann. § 35-11-406(b)(xii)(A) through (D).

30. The Council finds and concludes that based upon the testimony and exhibits admitted during the contested case, Black Hills has proven that Landowners are not “resident or agricultural landowners” under (xi).

31. The Council finds and concludes that Landowners meet (xi)(A) in that they acquired the land through descent, inheritance, or by gift or conveyance from a member of their immediate family. However, the Council finds and concludes that Landowners do not meet the requirement outlined in (xi)(B). It is undisputed that Landowners do not have their principal place of residence on the land, they do not personally conduct farming or ranching operations upon the land to be affected by the surface mining operations, and Landowners do not receive directly a significant portion of their income from such farming or ranching operations. Accordingly, Landowners are not a “resident or agricultural landowner” under (xi).

32. The Council must next determine if Black Hills has proven by a preponderance of the evidence that it satisfied the four elements in § 35-11-406(b)(xii)(A)-(D).

33. Taking the four elements in order, the Council finds that Black Hills has not proven that it satisfied the first element in (xii)(A)—that its mining and reclamation plans were submitted to Landowners. It is undisputed that Black Hills submitted its mining and reclamation plans to Landowners in August 2021. However, it is also undisputed that the mining plan was revised in 2024 and the revised mining plan (that was ultimately approved by the Department of Environmental Quality) was never submitted or provided to the Landowners.

34. Although Black Hills claims that the initial mine plan was not substantively revised from what the Firnekases received in 2021, it is undisputed that the mine plan was revised in 2024 and it was never submitted to the Firnekases for their consent as required by (xii)(A). The 2024

revisions reduced the original mine plan from twenty-two pages to seventeen pages. The revised mine plan included less detail about the pits and included specifics regarding sage-grouse so there were sentences that explained Black Hills would not disturb topsoil during breeding and nesting season which is from March to June. In addition, the revised mine plan included a provision that Black Hills would not make any noise from 8:00 p.m. to 6:00 a.m. The Council concludes that Black Hills was required to submit to Landowners the final revised mine plan that Black Hills submitted to the Department of Environmental Quality for approval and which was ultimately approved. In addition, even if Black Hills was not required to submit the revised mine plan to the Firnekases, because Black Hills did not prove that the mine and reclamation plan maps were ever submitted or provided to the Firnekases, the Council is left to conclude that Black Hills did not satisfy this element because the complete mine and reclamation plans (which includes the maps) were not provided to the Firnekases.

35. Next, the Council concludes that Black Hills has not proven that it satisfied the second element in (xii)(B)—that its mining and reclamation plans are detailed so as to illustrate the full proposed surface use including proposed routes of egress and ingress. As explained by Doug Gibson from Black Hills, the mine and reclamation plans are general—most of the specific information is identified and illustrated in the mine and reclamation plan maps. The mine plan and reclamation plan maps are the documents that contain and illustrate the full detail of the mining and reclamation plans on the affected property. The maps are the most important part of the mining and reclamation plans. Because the evidence presented during the hearing does not prove that the maps were ever submitted to the Firnekases, the Council is left to conclude that the mine and reclamation plans as submitted to the Firnekases do not meet this element. The requirement to

illustrate the full proposed surface use including routes of egress and ingress cannot occur without providing those maps to the Firnekases. Based upon the evidence, Black Hills' mine and reclamation plans without the maps are not detailed enough to illustrate the full proposed surface use including proposed routes of egress and ingress.⁵

36. Accordingly, the Council finds and concludes that Black Hills did not satisfy element two.

37. The Council finds that Black Hills has proven that it satisfied the third element—that its use does not substantially prohibit the Landowners' operations.

38. Black Hills' use of the land will not substantially prohibit Landowners' operations. First, Landowners do not conduct any operations on the land, in fact, they have not been out to the land for at least a year. The only operations on the land are some livestock operations by the Firnekas Ranch to run cattle on the land. However, Black Hills' mining operations will not substantially prohibit the Firnekas Ranch's livestock operations because the disturbed land at any one time is very minimal. Black Hills has been successful in working with livestock owners and their grazing operations with minimal impact and problems. In addition, the land is large enough that the livestock could be moved to other areas away from disturbed land. Based upon the evidence, the Council concludes that Black Hills' operations will not substantially prohibit the Landowners' or the Firnekas Ranch's operations on the land.

⁵ Even if the Council believed that the mine plan and reclamation plan maps were provided to the Firnekases, the maps were never admitted into evidence during the contested case to assist the Council to determine if (b)(xii)(B) was met. Although there was testimony about a map that was used for demonstrative purposes during the hearing, it was unclear if the map being discussed was the mine plan map or reclamation plan map referred to in the mine or reclamation plans or some other map. Without the mine plan map and reclamation plan map being admitted into evidence, the Council is unable to conclude whether (b)(xii)(B) was satisfied.


39. The Council finds that Black Hills has proven that it satisfied the fourth element—that its proposed plan reclaims the surface to its approved future use, in segments if circumstances permit, as soon as feasibly possible. Black Hills’ reclamation plan is designed to reclaim the surface to its pre-mining use (and approved future use) in segments and as soon as feasibly possible. The reclamation schedule explains that the reclamation of disturbed areas will begin as soon as possible, and all attempts will be made to assure that reclamation occurs concurrently with the mining activities.

40. Because Black Hills failed to prove that it satisfied all four elements in (xii), the Council must deny its petition for an order in lieu of surface owner consent. Black Hills failed to prove that it satisfied the necessary elements outlined in (xii)(A) and (B).

VI. ORDER

IT IS HEREBY ORDERED that Black Hills’ petition for an order in lieu of surface owner consent as to its mining plan and reclamation plan is denied.

ENTERED this 18th day of December 2024


Ryan Greene (Dec 18, 2024 12:51 MST)

Ryan Greene, Hearing Officer
Environmental Quality Council