

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

BEFORE THE STATE OF NEVADA,
STATE ENVIRONMENTAL COMMISSION

In Re:)
)
Appeal of Solid Waste Disposal Site Permit)
Permit No. SW495REV00)
Operator: Recology)

WITNESS LIST

PLEASE TAKE NOTE that Dolan Law LLC and Robert E. Dolan, Esq. on behalf of Clean Desert Foundation, Robert Hannum and Richard Cook, appellants herein, and provides this witness list.

Dated this 14th day of May, 2012.



DOLAN LAW, LLC.
By: ROBERT E. DOLAN, ESQ.
Nevada Bar No. 6271
311 S. Bridge St., Suite E
Winnemucca, NV 89445
Ph: 775 625-3200
Fax: 775 625-4286
Counsel for Clean Desert Foundation, Robert Hannum and Richard Cook

WITNESS LIST

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 1. Richard Cook – 4320 Paradise Ranchos Drive, Winnemucca, Nevada 89445.

This witness will testify to the fact that NDEP abused its discretion in issuing the operating permit under appeal, matter concerning the improper location of the site, inaccessibility to the site under all conditions, violations of state law, poor soil, flooding, permit application contents, permitting process, engineering operations plan, water quality, soil quality and wildlife and general threats to the aquifer based on the variance from the 100 foot distance requirement from the base of the site to the uppermost part of the aquifer under the NAC.

- 2. Chuck Schlarb – P.O. Box 2231, Winnemucca, Nevada 89446.

This witness will present a power point presentation concerning the following, and will testify to the fact that NDEP abused its discretion in issuing the operating permit under appeal, concerning the improper location of the site, poor soil, hydro geologic conditions, flooding, permit application contents, permitting process, engineering operations plan, water quality, soil quality and wildlife and general threats to the aquifer based on the variance from the 100 foot distance requirement from the base of the site to the uppermost part of the aquifer under the NAC.

- 3. Jonathan Taylor, P.E. CEM, Nevada Division of Environmental Protection, Bureau of Waste Management, 901 South Stewart St., Suite 4001, Carson City, NV 89701.

This witness will testify to the fact that NDEP abused its discretion in issuing the operating permit under appeal as it pertains to water, soil and air qualities, and the granting of the variance to the 100 foot distance requirement from the site to the uppermost part of the aquifer under the NAC.

- 4. Robert Hannum – 624 Victor Way #4, Mountainview, California 94040.

This witness will testify to the fact that NDEP abused its discretion in issuing the operating permit under appeal concerning the improper location of the site, poor soil, flooding, permit application contents, permitting process, engineering operations plan, water quality, soil quality and wildlife and general threats to the aquifer based on the variance from the 100 foot distance requirement from the base of the site to the uppermost part of the aquifer under the NAC.

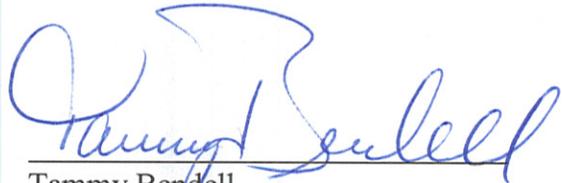
CERTIFICATE OF SERVICE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I hereby certify that on this 14th day of May, 2012, I have deposited in the U.S. Mail in a properly addressed and stamped envelope a true and correct copy of a Witness List, addressed to the following:

John Frankovich, Esq.
Debbie Leonard, Esq.
McDonald Carano Wilson
100 W. Liberty St., 10th Floor
Reno, Nevada 89501

Office of Attorney General
Attn: Cassandra Joseph
100 N. Carson St.
Carson City, NV 89701



Tammy Bendell