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5
6 BEFORE THE NEVADA STATE ENVIRONMENTAL COMMISSION
7

8 In Re:

9 Appeal of Groundwater Pollution Control
10 Permit No. NS2014502
11 Smith Valley Dairy

12 **SOS's OPENING BRIEF EXHIBITS**

- 13
14 Exhibit 1 Pew Commission on Industrial Farm Animal Production, *Putting Meat on the*
15 *Table: Industrial Farm Animal Production in America* (2008)
16 Exhibit 2 JoAnn Burkholder, et al., *Impacts of Wastes from Concentrated Animal Feeding*
17 *Operations of Water Quality*
18 Exhibit 3 Linda Knobeloch et al., *Blue Babies and Nitrate-Contaminated Well Water*, 108
19 *Env. Health Perspectives* 675 (July 2000)
20 Exhibit 4 US Geologic Survey, *Relating Nitrogen Sources and Aquifer Susceptibility to*
21 *Nitrate in Shallow Ground Water of the United States*
22 Exhibit 5 USEPA, *Detecting and Mitigating the Environmental Impact of Fecal Pathogens*
23 *Originating from Confined Animal Feeding Operations: Review 3* (September 2005)
24 Exhibit 6 University of Wisconsin-Extension, Final Report of the Northeast Wisconsin Karst
25 Task Force (Feb. 2007)
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- 1 Exhibit 7 *Community Association for Restoration for the Environment v. Cow Palace LLC*,
2 Case No.: 13-CV-3016-TOR (E.D. Wash.), Order Re: Cross Motions for Summary
3 Judgment (January 14, 2015)
- 4 Exhibit 8 USEPA, *Risk Assessment Evaluation for Concentrated Animal Feeding Operations*
5 (May 2004)
- 6 Exhibit 9 WTS-38 Animal Waste Storage Impoundments guidance (August 2014)
- 7 Exhibit 10 WTS 37 Guidance Document for the Design of Lined Wastewater Holding Ponds
8 (Surface Impoundment)" (September 2011)
- 9 Exhibit 11 U.S. Geologic Soil Survey of Lyon County (1963) (To be filed separately)
- 10 Exhibit 11a Lumos & Associates, Geotech Report
- 11 Exhibit 12 <http://articles.latimes.com/2013/mar/30/business/la-fi-california-dairies-20130330>
- 12 Exhibit 13 <http://dairy.nv.gov/Consider-Nevada/>
- 13 Exhibit 14 <http://www.diversifynevada.com/news/news-articles/las-vegas-review-journal-cow->
14 [power-new-milk-production-plant-could-provide](http://www.diversifynevada.com/news/news-articles/las-vegas-review-journal-cow-)
- 15 Exhibit 15 Smith Valley Dairy Groundwater Map GR3
- 16 Exhibit 16 March 19, 2014 NDEP Email
- 17 Exhibit 17 December 31, 2014 NDEP letter to Dirk Vlot (Cease and Desist Order)
- 18 Exhibit 18 February 18, 2015 NDEP Letter Re Formal Enforcement, Smith Valley Dairy
- 19 Exhibit 18a August 26, 2014 NDEP Email
- 20 Exhibit 20 December 29, 2014 Email
- 21 Exhibit 21 December 29, 2014 NDEP Email
- 22 Exhibit 22 NDEP Emails (To be filed separately)
- 23 Exhibit 23 Notice of Proposed Action
- 24 Exhibit 24 NDEP March 9, 2015 Notice of Decision
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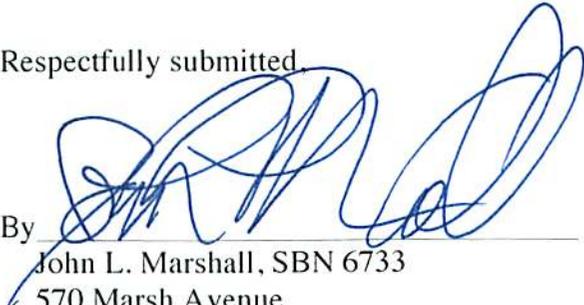
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Exhibit 25 Groundwater Pollution Control Permit No. NS2014502

Exhibit 26 Kathy J. Martin's Comments on Smith Valley Dairy Permit Application

Dated: May 19, 2015.

Respectfully submitted



By
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CERTIFICATE OF SERVICE

Pursuant to NRS 239B.030, the undersigned affirms that the preceding document does not contain the social security number of any person. I hereby certify that the foregoing SOS's Opening Brief Exhibits was served on the parties a copy thereof on the 8th day of May 2015, by electronic mail:

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