

APPEAL HEARING
BEFORE THE STATE ENVIRONMENTAL COMMISSION
STATE OF NEVADA

In Re:)	
)	
Appeal of Water Pollution Control Permit:)	ANSWER OF ANGLOGOLD ASHANTI
NEV0087001, Big Springs Mine)	(NEVADA) CORP. TO GREAT BASIN
)	MINE WATCH'S PETITION FOR
)	RECONSIDERATION AND
)	REHEARING
)	

AngloGold Ashanti (Nevada) Corp. ("AngloGold Ashanti") opposes Great Basin Mine Watch's Petition for Reconsideration and Rehearing ("Petition") because, as explained below, Great Basin Mine Watch ("GBMW") has not identified any basis for such reconsideration or rehearing.

The underlying basis for GBMW's Petition is its assertion that Attorney General Opinion No. 2006-03 on standing requirements ("AGO") is unreasonable and based on erroneous conclusions of law. Petition at 3. GBMW is asking this panel of the State Environmental Commission ("SEC") to second guess the legal conclusions of the Nevada Attorney General on matters of Nevada law. Even if this were an appropriate role for the SEC, the AGO which GBMW contests was issued on June 19, 2006--more than two weeks before the July 6, 2006 Hearing in this matter. As such, GBMW had time to fully evaluate the AGO and prepare a written response brief explaining to the SEC why, in GBMW's opinion, the AGO was flawed. And, in fact, counsel for GBMW stated during the July 6 Hearing that such a response brief had been prepared. Hearing Transcript at 9:3-7. However, instead of submitting that brief, counsel for GBMW orally presented "a summary of the substance of" the arguments set forth therein. Id. at 18: 3-12. A review of the hearing transcript demonstrates that GBMW's counsel had, in fact, summarized the very same legal arguments GBMW now makes in its Petition. See id. at 9:22-18:2. In short, nothing has changed from the July 6 Hearing. The legal arguments in GBMW's

Petition are repetitive and there is no credible basis for concluding that the record is incomplete or inaccurate. Thus, there is no basis for reconsideration or a rehearing. See NAC 445B.899.

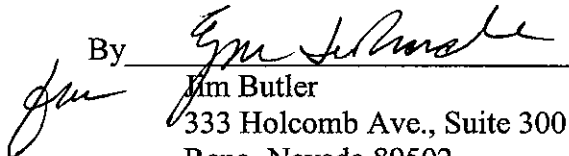
Moreover, GBMW chose not to submit its brief in opposition to the AGO because, according to its counsel, the points raised in that brief had been "summarized...sufficiently," and if the brief was submitted the other parties would get "30 days to respond" to it. Hearing Transcript at 20:14-21:16. GBMW wanted a final decision on the matter on the day of the July 6 Hearing. Id. It is a bit disingenuous for GBMW to now ask the SEC to revisit its final decision on the basis of the very same arguments that GBMW has merely reformatted as a petition for reconsideration and rehearing.

WHEREFORE, AngloGold Ashanti respectfully requests that the SEC deny GBMW's Petition because there is no basis for it.

Respectfully submitted this 1st day of August, 2006.

PARSONS BEHLE & LATIMER

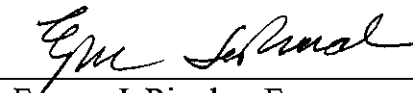
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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of August, 2006, I caused to be emailed and mailed, first class, postage prepaid, a true and correct copy of the foregoing **ANSWER OF ANGLOGOLD ASHANTI (NEVADA) CORP. TO GREAT BASIN MINE WATCH'S PETITION FOR RECONSIDERATION AND REHEARING** to:

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