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NEVADA STATE
ENVIRONMENTAL COMMISSION

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12 *Attorneys for Petitioner:*
13 Bedroc Limited, LLC
14 2745 N. Nellis Blvd.
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16
17 **BEFORE THE STATE OF NEVADA, STATE ENVIRONMENTAL COMMISSION**

18 In Re:

**PETITION FOR LEAVE TO
INTERVENE**

19 Appeal of Class I Permit to Operate a Municipal
20 Waste Area-Fill Disposal Site: Permit No.
21 SW1722REV00
22 Bedroc Limited, LLC

23 **PETITION FOR LEAVE TO INTERVENE**

24 COMES NOW Petitioner Bedroc Limited, LLC, (Bedroc) by and through its counsel,
25 Greenberg Taurig, LLP, and hereby files its Petition for Leave to Intervene in Coyote Springs
26 Investment, LLC's (Coyote Springs) appeal to the Nevada State Environmental Commission (NV
27 SEC). This petition is made pursuant to NAC 445B.8915.

28 On September 29, 2014, Coyote Springs filed an appeal challenging the decision of the
State of Nevada Department of Conservation & Natural Resources Division of Environmental
Protection to issue Permit No. SW1722REV00 in favor of Bedroc, with an effective date of
September 19, 2014. Bedroc has a direct and substantial interest in this proceeding because
Bedroc owns the permit and relies on it to conduct its business. Thus, the NV SEC's decision
regarding the appeal substantially affects Bedroc's ability to operate in Nevada. Bedroc's very

Case No. A-13-687126-B

LV 420323930v1


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1 survival hinges on the use of Permit No. SW1722REV00. Further, Bedroc's participation in the
2 appellate process would not unreasonably broaden the issues or prejudice Coyote Springs because
3 Bedroc, like Coyote Springs, is concerned only with Permit No. SW1722REV00. Additionally,
4 Bedroc acknowledges that it intends to present evidence in the appellate proceeding to support
5 the confirmation of Permit No. SW1722REV00 and/or rebut claims made by Coyote Springs, if
6 necessary. However, Bedroc does not believe its evidence to be presented would unreasonably
7 expand the proceedings beyond those initiated by Coyote Springs.

8 Based on the foregoing, Bedroc respectfully requests the NV SEC to grant Bedroc's
9 petition for leave to intervene in this matter.

10 DATED this 8th day of October, 2014.

11
12 **GREENBERG TRAURIG, LLP**

13 By: 
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CERTIFICATE OF SERVICE

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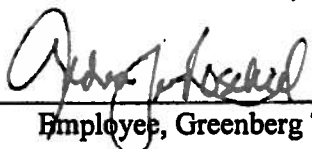
I certify that I am an employee of Greenberg Traurig and that on this day, I caused a true and correct copy of the forgoing *Petition for Leave to Intervene* to be served by the following method on the party noted below:

- by mailing in a sealed, first class postage-prepaid envelop, addressed to the last-known office address of the attorney, and deposited with the United States Postal Service in Las Vegas, Nevada.
- by hand delivery.
- by sending via overnight courier in a sealed envelope.
- by faxing to the attorney at the fax number that is the last-known fax number.
- by electronic mail to the last known e-mail address.

Coyote Springs Investment, LLC
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P.O. Box 37010
Coyote Springs, NV 89037
Emilia.cargill@coyotesprings.com

DATED this 8th day of October, 2014.

GREENBERG TRAURIG, LLP



Employee, Greenberg Traurig

Case No. A-13-687126-B

