



McDONALD·CARANO·WILSON^{LLP}

John Frankovich
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Reply to: Reno

March 23, 2010

State Environmental Commission
c/o John Walker
901 S. Stewart Street, Suite 4001
Carson City, NV 89701-5249

Re: Petition for Leave to Intervene
Appeal of Jungo Land & Investments, Inc.'s
Class I Air Quality Operating Permit to Construct
AP 4953-2525, Facility ID No. A0991
By Robert E. Dolan, Massey K. Mayo and Phil Jacka

Petitioner's Name: Jungo Land & Investments, Inc.
50 California Street, 24th Floor
San Francisco, CA 94111

Attorney for Petitioner: John Frankovich
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McDonald Carano Wilson LLP
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Dear Commissioners,

Pursuant to NAC 445B.8915, Real Party-in-Interest Jungo Land & Investments, Inc. ("Jungo"), through counsel McDonald Carano Wilson LLP, files this Petition for Leave to Intervene in the above-titled appeals filed by Robert E. Dolan, Massey K. Mayo and Phil Jacka of the Class I Air Quality Operating Permit to Construct, AP 4953-2525, Facility ID No. A0991.

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As the holder of the permit being challenged by the Appellants, Jungo has a direct and substantial interest in this proceeding. Should the appeal be granted, Jungo will be adversely affected because the properly-issued permit granted to Jungo could be overturned. Because Jungo is the real party-in-interest, Jungo requests that the Commission grant intervenor status to Jungo.

Jungo plans to participate in all aspects of this proceeding, including the presentation of evidence. Additionally, Jungo requests that the Commission grant Jungo intervenor status as soon as possible so that Jungo can participate in pre-hearing motion practice and/or briefing.

Thank you for your consideration of this Petition to Intervene. Please contact me should you have any questions.

Very truly yours,

A handwritten signature in black ink that reads "John Frankovich". The signature is written in a cursive style with a large, prominent 'J'.

JOHN FRANKOVICH
Attorney for Real Party-in-Interest
Jungo Land & Investments, Inc.

JF/keh



CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of the McDonald Carano Wilson LLP, and that on this 23rd day of March 2010, I provided a copy of the Petition for Leave to Intervene to the following via first-class United States mail:

Robert Dolan
311 S. Bridge Street, Suite E
Winnemucca, Nevada 89445

Massey Mayo
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