



McDONALD·CARANO·WILSON^{LLP}

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Reply to: Reno

March 15, 2012

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

Re: Amended Petition for Leave to Intervene
in the Appeals by Richard Cook, Robert Hannum and Robert E. Dolan of
the Clean Desert Foundation of Recology's Class I Solid Waste Disposal
Site Permit SW495REV00

Petitioner's Name: Recology
50 California Street, 24th Floor
San Francisco, CA 94111

Attorneys for Petitioner: John Frankovich
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Dear Commissioners,

Pursuant to NAC 445B.8915, Real Party-in-Interest Recology, through counsel McDonald Carano Wilson LLP, files this Amended Petition for Leave to Intervene in the above-titled appeals filed by Richard Cook, Robert Hannum and Robert E. Dolan of the Clean Desert Foundation of the Class I Solid Waste Disposal Site Permit, SW495REV00, issued to Recology.

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

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

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

Sincerely,

MCDONALD CARANO WILSON LLP
John Frankovich
Debbie Leonard
Attorneys for Real Party-in-Interest
Recology

DL/pm



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 12th day of March, 2012, 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

Richard Cook
4320 Paradise Ranchos Drive
Winnemucca, Nevada 89445

Robert Hannum
624 Victor Way #4
Mountain View, CA 94040

Cassandra Joseph
Attorney General's Office
Deputy Attorney General
100 N. Carson Street
Carson City, NV 89701

A handwritten signature in black ink, appearing to read 'Pamela Miller', written over a horizontal line.

Pamela Miller