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August 9, 2011

Mr. John B. Walker, Executive Secretary
State Environmental Commission
901 South Stewart St., Suite 4001
Carson City, Nevada 89701-5249

VIA UPS and Facsimile at 775-687-5856

RE: Petition for Leave to Intervene (“Petition”); Appeals of Renewal of Class II Air Quality Operating Permit No. AP2992-1473.01

Dear Mr. Walker:

Pursuant to NAC 445B.8915, Bango Oil LLC (“Bango Oil”), by and through its undersigned attorneys, hereby petitions the State Environmental Commission (the “Commission” or the “SEC”) for leave to intervene in all proceedings related to the appeals filed with the Commission by Donald A. Mello and Richard Wideman (collectively, the “Appeals”), regarding the renewal of Class II Air Quality Operating Permit AP2992-1473.01 (at times, the “Permit”). In support of its Petition, Bango Oil submits the following information pursuant to NAC 445B.8915.2:

a. The proceeding in which petitioner requests leave to intervene

Petitioner Bango Oil requests leave to intervene in all proceedings related to the Appeals, which Appeals arise from the July 8, 2011 decision of the Nevada Division of Environmental Protection (“NDEP”) to approve the renewal of Bango Oil’s Class II Air Quality Operating Permit No. AP2992-1473.01 for its facility in Churchill County, Nevada.

b. The name and address of the petitioner and any attorney or other authorized person representing the petitioner

The petitioner and its mailing address are:

Bango Oil LLC
16640 Wedge Parkway

Holland & Hart LLP Attorneys at Law

Phone (775) 327-3000 Fax (775) 786-6179 www.hollandhart.com

5441 Kietzke Lane Second Floor Reno, Nevada 89511

Aspen Billings Boise Boulder Carson City Cheyenne Colorado Springs Denver Denver Tech Center Jackson Hole Las Vegas Reno Salt Lake City Santa Fe Washington, D.C.



Reno, Nevada 89511

The following law firm is authorized to represent Petitioner in this proceeding:

Holland & Hart LLP
5441 Kietzke Lane
Second Floor
Reno, Nevada 89511
Attn: Bryce C. Alstead, Esq.
Phone: 775-327-3000
Email: balstead@hollandhart.com

c. Petitioner's interest in this proceeding:

Petitioner Bango Oil is the permittee under the Class II Air Quality Operating Permit that is the subject of the Appeals and is the owner of the facility to which the Permit relates; accordingly, Petitioner's interests are directly and substantially affected by this proceeding.

d. The manner in which petitioner will be affected by this proceeding.

Petitioner Bango Oil is the permittee under the Permit that is the subject of this proceeding and is the owner of the facility to which the Permit relates. The renewal of the Permit is necessary to the continued operation of the Bango Oil facility. Any reversal or modification of NDEP's decision to renew the Permit would have substantial adverse effects on the ability of Bango Oil to continue to operate the facility.

e. Whether the petitioner intends to present evidence in the proceeding

Petitioner presently intends to present evidence in the proceeding.

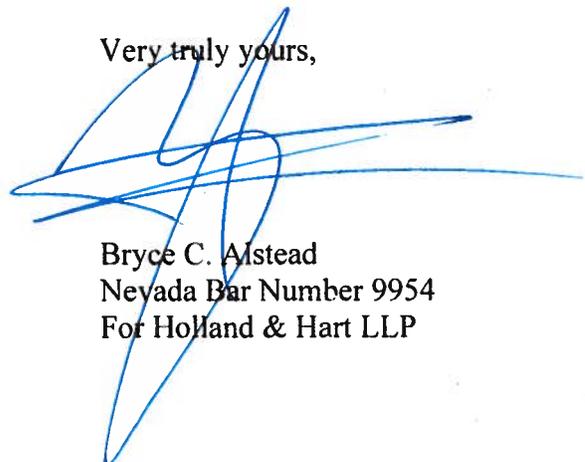
f. Time of filing Petition

The Appeals are each dated July 20, 2011; however, neither Appeal contains a stamp indicating when the Appeals were actually filed with the Commission. The SEC's website indicates that Mr. Mello's appeal was received by the Commission on July 21, and that Mr. Wideman's appeal was received on July 22.¹ The undersigned, as Bango Oil's attorney, was first apprised of the Appeals and of Bango Oil's right to request intervention by NDEP on August 8, 2011. This Petition to Intervene is filed the day after Bango Oil's attorney first learned of the Appeals; as such, this Petition should be deemed timely filed pursuant to NAC 445B.8915(2). Further, because no action has been taken on either of the Appeals, and no hearing has been

¹ See, http://sec.nv.gov/main/bango_appeal-2011.htm (last accessed August 9, 2011).

conducted (and, to the undersigned's knowledge, no hearing or briefing schedule has yet been set), neither of the appellants will be prejudiced by granting this Petition.

Very truly yours,



Bryce C. Alstead
Nevada Bar Number 9954
For Holland & Hart LLP

CERTIFICATE OF SERVICE

I certify that on August 9, 2011 I served a copy of the foregoing document to the following by

- U.S. Mail, postage prepaid
- Hand Delivery
- Fax

Mr. Donald A. Me!lo
13999 Cadet Road
Fallon, Nevada 89406

Mr. Richard Wideman
13993 Cadet Road
Fallon, Nevada 89406

Nevada Division of Environmental Protection
c/o Jasmine K. Mehta, Esq.
Deputy Attorney General
100 North Carson Street
Carson City, Nevada 89701



By: _____
An Employee of Holland & Hart LLP