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5 Silver Peak Ad Hoc Advisory Committee

6 Complainants

7 **NEVADA STATE ENVIRONMENTAL COMMISSION**

8 In Re:

9 Appeal of Water Pollution Control  
10 Permit NEV0070005  
11 Permittee: Rockwood Lithium, Inc.

**COMPLAINANTS' "EVENTS, FACTS  
AND EVIDENCE"**

**FOR SEPTEMBER 25, 2013 HEARING**

12 The Order of the State Environmental Commission dated August 26, 2013 directs that each  
13 party shall exchange with other parties the notice of the identity of each person who will offer direct  
14 or written testimony and each exhibit the party intends to offer as evidence at the Hearing scheduled  
15 for September 25, 2013. By this filing, Complainants comply with this order.

16 Complainants have reviewed the Exhibit and Witness Lists submitted by NDEP and will, if  
17 necessary, introduce the same exhibits identified on subject lists. At the present time, Complainants  
18 will not likely present any witnesses due to the distance and expense required to travel to Carson City  
19 Nevada.

20 Complainants, however, may offer Additional Events, Facts And Evidence, exhibits or  
21 witnesses necessary to successfully quash subject hearing for Good Cause Shown and/or as rebuttal  
22 in response to evidence or argument from the opposition parties.

23 Dated: September 19,2013

24 By: Dehnert Queen, Paul Rupp  
25 Complainants

26 Filed by e-mail

27  
28

1 **CERTIFICATE OF SERVICE**

2 The undersigned Complainants', having no third party employee or staff, does hereby certify  
3 that on the 19<sup>th</sup> day of September, 2013, a true and correct copy of the following document will be  
4 delivered to the Opposition Parties today to the following:

5 Document Title: **COMPLAINANTS' "EVENTS, FACTS AND EVIDENCE"**  
6 **As Exhibits for September 25, 2013 Hearing**

7 **Joe Dunn, General Manager**  
8 **Rockwood Lithium**  
9 **P.O. Box 98**  
10 **Silver Peak NV 89047**  
11 **[joe.dunn@rockwoodlithium.com](mailto:joe.dunn@rockwoodlithium.com)**

12 **Valerie King, Executive Secretary**  
13 **State Environmental Commission**  
14 **901 South Stewart Street, Suite 4001**  
15 **Carson City, Nevada 89701**  
16 **Email: [vking@ndep.nv.gov](mailto:vking@ndep.nv.gov)**

17 **Appellants**

18 **Cassandra Joseph, Esq.**  
19 **Deputy Attorney General**  
20 **Nevada Attorney General's Office**  
21 **100 N. Carson St.**  
22 **Carson City, NV 89701-4717**  
23 **Email: [cjoseph@ag.nv.gov](mailto:cjoseph@ag.nv.gov)**

24 **Attorneys for Nevada Division of Environmental Protection**

25 **Served by email**

26 **Dehnert Queen**  
27 **Paul Rupp**

28 Ref: Brief to SEC Hearing Complainants' List of Exhibits and Witnesses-091913.pdf