

1           BEFORE THE STATE OF NEVADA, STATE ENVIRONMENTAL COMMISSION

**In Re:** ) **Declaration of Daniel Galpern**  
**Appeal of Water Pollution Control** )  
**Groundwater Permit NEV91022** )  
**Reid Gardner Station** )

2  
3           **1.**       My name is Daniel Galpern. I am over the age of eighteen years. I am one of the  
4 counsel for Appellant Sierra Club in this case. I make this declaration in support of Sierra Club’s  
5 motion for subpoenas, vacatur of hearing and briefing, and suspension of permit and injunction  
6 against construction and related site preparation activities.

7           **2.**       Exhibit 1 provides excerpts of emails that I sent to parties in this matter regarding  
8 document and data requests. I omitted any substantive material so as not, by this exhibit, to  
9 prove more than that Sierra Club made numerous and strenuous efforts to secure such material,  
10 as well as to meet with parties so as to discuss such material and the issues they raise.

11           **3.**       Exhibit 2 constitutes a faithful reproduction of a memo Elliot Lips sent to me as  
12 an attachment to an email of Oct 4.

13           **4.**       Exhibit 3 constitutes a faithful reproduction of a memo Elliot Lips sent to me as  
14 an attachment to an email of Oct 6.

15           **5.**       I declare under the penalty of perjury that the foregoing is true and correct to the  
16 best of my knowledge.



\_\_\_\_\_  
Daniel Galpern, Staff Attorney  
Oregon Bar No. 06195  
Western Environmental Law Center  
1216 Lincoln Ave.  
Eugene, OR 97403  
(541) 359-3243