

STATE OF COLORADO
MINED LAND RECLAMATION BOARD

RESPONSE TO MOTION TO VACATE AND RESCHEDULE HEARING

IN RE: FREMONT PAVING & REDI-MIX, INC'S PUEBLO COUNTY AGGREGATE PROJECT APPLICATION
File No. M-2016-009

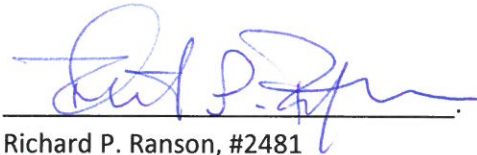
Fremont Paving & Redi-Mix, Inc, by and through its legal counsel of record, responds to the Motion to Vacate and Reschedule Hearing filed by certain Objectors, as follows:

1. Applicant requests the Board deny Objectors Motion, and that the Board hearing scheduled for November 16, 2016 be held and conducted as scheduled.
2. Applicant has complied with all rules, regulations and requirements as set forth in the Minineral Extractions Rules and as set forth in 2 CCR 407-4, CONSTRUCTION MATERIALS, and is entitled to a hearing on its application for a permit. No good cause is shown by Objectors to vacate, delay and reschedule Applicant's scheduled hearing.

WHEREFORE, Applicant requests the Board deny Objectors' request the scheduled hearing be vacated and rescheduled, and such other relief as is proper.

Respectfully submitted this 9th day of November, 2016.

RANSON & KANE, P.C.



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CERTIFICATE OF SERVICE

I certify a true copy of Applicant's Response to Motion to Vacate and Reschedule was served on the parties listed below by email (except as noted) as listed below this ____ day of November, 2016.

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