

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:

PRAIRIE RIVERS NETWORK,)
 by and for its members,)
 SIERRA CLUB, ILLINOIS)
 CHAPTER, by and for its members)
)
)
 Complainant,)
)
 v.)
)
 FREEMAN UNITED COAL)
 MINING CO., L.L.C., and)
 SPRINGFIELD COAL CO., L.L.C.)
)
 Respondents.)

PCB 2010-061
(Enforcement-Water)

NOTICE OF ELECTRONIC FILING

To: Attached Service List

PLEASE TAKE NOTICE that on November 17, 2014, I electronically filed with the Clerk of the Pollution Control Board of the State of Illinois, PRAIRIE RIVERS NETWORK AND SIERRA CLUB'S FACT WITNESS DISCLOSURE, a copy of which is attached hereto and herewith served upon you.

Respectfully submitted,



Jessica Dexter
 Staff Attorney
 Environmental Law and Policy Center
 35 East Wacker Drive, Suite 1600
 Chicago, IL 60601
 312-795-3747

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PCB 2010-061
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PRAIRIE RIVERS NETWORK AND SIERRA CLUB'S FACT WITNESS DISCLOSURE

Sierra Club and Prairie Rivers Network submit this supplemental response to Freeman United's Interrogatory #8 (second request), in response to the Hearing Officer's October 16, 2014 Order, and pursuant to Supreme Court Rule 213(f)(1).

At this time, Sierra Club and Prairie Rivers Network present no fact witnesses to disclose, as they anticipate relevant facts to be developed through cross-examination of adverse party witnesses. Sierra Club and Prairie Rivers Network reserve the right to further supplement this discovery response, as well as the right to call adverse party witnesses under Section 2-1102 of the Code of Civil Procedure and 35 Ill. Admin. Code 101.624(a) if witnesses with relevant knowledge are not proffered by Springfield Coal and/or Freeman United.

Respectfully submitted,



Jessica Dexter
 Staff Attorney
 Environmental Law and Policy Center
 35 East Wacker Drive, Suite 1600
 Chicago, IL 60601

CERTIFICATE OF SERVICE

I, Jessica Dexter, hereby certify that I have filed the attached **NOTICE OF ELECTRONIC FILING** and **PRAIRIE RIVERS NETWORK AND SIERRA CLUB'S FACT WITNESS DISLCOSURE** in PCB 2010-061 upon the attached service list by depositing said documents in the United States Mail, postage prepaid, in Chicago, Illinois on November 17, 2014.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'JD', with a long horizontal flourish extending to the right.

Jessica Dexter
Staff Attorney
Environmental Law and Policy Center
35 East Wacker Drive, Suite 1600
Chicago, IL 60601
312-795-3747

SERVICE LIST

November 17, 2014

Carol Webb, Hearing Officer
Illinois Pollution Control Board
1021 North Grand Avenue East
P.O. Box 19274
Springfield, Illinois 62794-9274

Thomas A. Korman, R.A.
Freeman United Coal Mining Company, LLC
222 N. LaSalle Street Suite 800
Chicago IL 60601

Stephen Sylvester – Asst. Attorney General
Thomas H. Shepherd - Asst. Attorney General
Office of the Attorney General,
Environmental Bureau
69 West Washington Street, Suite 1800
Chicago, IL 60602

Springfield Coal Company, LLC
BCRA Co., R.A.
161 N Clark St, Suite 4300
Chicago, IL 60601

Dale A. Guariglia
John R. Kindschuh
Erin L. Brooks
Brian Sher
Bryan Cave, LLP
One Metropolitan Square
211 North Broadway, Suite 3600
St. Louis, MO 63102

E. Lynn Grayson
Steven M. Siros
Allison A. Torrence
Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654