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JUN 27 2016

WATER RIGHTS PROGRAM

ATTORNEYS:  
Thomas E. Brady  
tbrady@spearfishlaw.com

Steven T. Iverson  
siverson@spearfishlaw.com

**BRADY LAW**

A Professional Corporation  
135 E. Colorado Blvd.  
Spearfish, SD 57783  
Telephone: 605.722.9000

PROFESSIONAL STAFF:  
Jan Betten, CP  
jbetten@spearfishlaw.com  
Renae Tysdal, PLS  
rtysdal@spearfishlaw.com  
Wayne Gilbert, J.D.  
wgilbert@spearfishlaw.com

June 27, 2016

*Via Facsimile and First Class Mail*

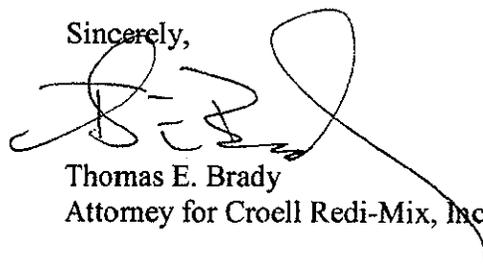
Jeanne Goodman  
Chief Engineer  
Water Rights Program  
Foss Building  
523 East Capitol  
Pierre, SD 57501  
Facsimile 605-773-4068

Re: In the Matter of the Application of Croell Redi-Mix, Inc.  
Application No. 2745-2

Dear Ms. Goodman:

Enclosed please find Witness Disclosure of Applicant Croell Redi-Mix, Inc. in the above-entitled matter, and Certificate of Service showing that copies of the enclosure are being sent to the persons shown on the Certificate of Service in the manner indicated.

Sincerely,



Thomas E. Brady  
Attorney for Croell Redi-Mix, Inc.

Encl.

cc: Rodney Freeman  
Eric Gronlund  
Michael M. Hickey  
Kelsey B. Parker  
Ann F. Mines Bailey  
Matthew E. Naasz

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WATER RIGHTS PROGRAM

STATE OF SOUTH DAKOTA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
BEFORE THE WATER MANAGEMENT BOARD

IN THE MATTER OF THE APPLICATION )
OF CROELL REDI-MIX, INC. ) WITNESS DISCLOSURE
APPLICATION NO. 2745-2 ) OF APPLICANT CROELL
) REDI-MIX, INC.
)

Croell Redi-Mix, Inc. by and through its undersigned counsel of record, hereby submits the following disclosure of witnesses who may be called at the hearing before the Water Management Board on July 7, 2016 at 10:00 A.M. CDT:

As to expert witnesses and reports, Croell Redi-Mix, Inc. intends to rely upon the Report to the Chief Engineer dated February 2, 2016 prepared by Ken Buhler, and the Recommendation of Chief Engineer Jeanne Goodman dated March 24, 2016, which by reference are incorporated herein. Therefore, Ken Buhler and Jeanne Goodman are hereby identified as expert witnesses to be called at the hearing.

Additionally, Croell Redi-Mix, Inc. may call the following employees and officers of Croell Redi-Mix, Inc.:

Kyle Frisinger, Aggregate Manager;

Matt McPhee, Aggregate Manager;

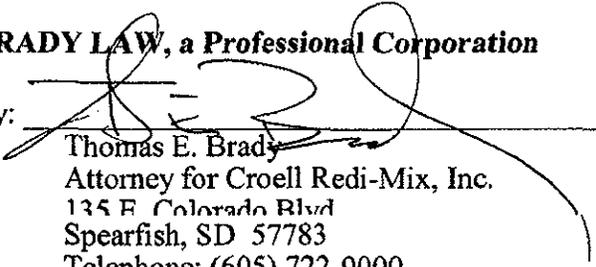
Brian Marchant, Regional Manager;

who shall testify, if necessary, that there is a reasonable need for water for a quarry operation and agricultural purposes on the property; and use of water from the well to be drilled after receipt of approval of Water Rights Permit for quarry purposes and agricultural purposes.

Additionally, Croell Redi-Mix, Inc. reserves the right to call Petitioners Duane Abata, Don Burger, Pat Hall, and Barrett Wendt, and any witnesses identified by said Petitioners.

Dated this 27<sup>th</sup> day of June, 2016.

**BRADY LAW, a Professional Corporation**

By: 

Thomas E. Brady  
Attorney for Croell Redi-Mix, Inc.  
135 E. Colorado Blvd  
Spearfish, SD 57783  
Telephone: (605) 722-9000  
Fax: (605) 722-9001  
Email: [tbrady@spearfishlaw.com](mailto:tbrady@spearfishlaw.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 27<sup>th</sup> day of June, 2016, a true and correct copy of **Witness Disclosure of Croell Redi-Mix, Inc.** was served in the following manner upon the following person(s), by placing the same in the service indicated, postage prepaid as applicable, addressed as follows:

Ann F. Mines Bailey	<input checked="" type="checkbox"/>	U.S. Mail
Assistant Attorney General	<input type="checkbox"/>	Hand Delivery
1302 East Highway 14, Suite 1	<input type="checkbox"/>	Facsimile
Pierre, SD 57501	<input type="checkbox"/>	Overnight Delivery
Facsimile 605-399-6041	<input type="checkbox"/>	Odyssey File & Serve
<a href="mailto:Ann.mines@state.sd.us">Ann.mines@state.sd.us</a>	<input checked="" type="checkbox"/>	Email
Matthew E. Naasz	<input checked="" type="checkbox"/>	U.S. Mail
Assistant Attorney General	<input type="checkbox"/>	Hand Delivery
1302 East Highway 14, Suite 1	<input type="checkbox"/>	Facsimile
Pierre, SD 57501	<input type="checkbox"/>	Overnight Delivery
Facsimile 605-773-4106	<input type="checkbox"/>	Odyssey File & Serve
<a href="mailto:Matthew.naasz@state.sd.us">Matthew.naasz@state.sd.us</a>	<input checked="" type="checkbox"/>	Email
Rodney Freeman	<input checked="" type="checkbox"/>	U.S. Mail
Hearing Chair	<input type="checkbox"/>	Hand Delivery
Water Management Board	<input type="checkbox"/>	Facsimile
P.O. Box 176	<input type="checkbox"/>	Overnight Delivery
Huron, SD 57350	<input type="checkbox"/>	Odyssey File & Serve
Facsimile: 605-352-2205	<input checked="" type="checkbox"/>	Email
<a href="mailto:rfreeman.huronlaw@midconetwork.com">rfreeman.huronlaw@midconetwork.com</a>		

Jeanne Goodman  
Chief Engineer  
Water Rights Program  
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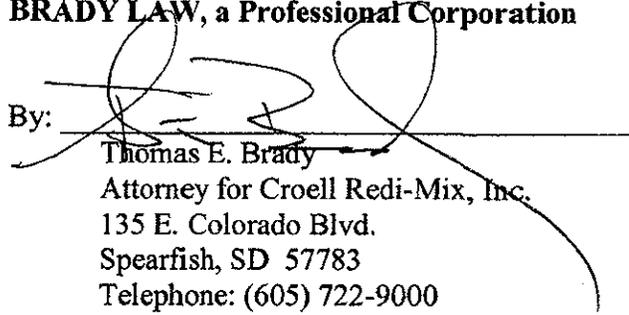
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- Facsimile
- Overnight Delivery
- Odyssey File & Serve
- Email

Michael M. Hickey  
Kelsey B. Parker  
Bangs, McCullen, Butler,  
Foye & Simmons, L.L.P.  
333 West Boulevard, Ste. 400  
P.O. Box 2670  
Rapid City, SD 57709  
Facsimile 605-343-1503  
[mhickey@bangsmccullen.com](mailto:mhickey@bangsmccullen.com)  
[kparker@bangsmccullen.com](mailto:kparker@bangsmccullen.com)

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Thomas E. Brady  
Attorney for Croell Redi-Mix, Inc.  
135 E. Colorado Blvd.  
Spearfish, SD 57783  
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Email: tbrady@spearfishlaw.com