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ADMINISTRATOR

June 19, 2007

Ms. Carole J. Washburn
WUTC Executive Secretary
Washington Utilities & Transportation Commission
1300 S Evergreen Park Drive SW
PO Box 47250
Olympia WA 98504-7250

RE: *Waste Connections of Washington, Inc., v. Enviro / Con & Trucking, Inc., et. al.*
WUTC Case No. TG-071194

Dear Ms. Washburn:

Enclosed for filing please find the original and twelve copies of *Clark County's Petition to Intervene* regarding the above-entitled action. Please conform the additional copy and return it to our office using the enclosed self-addressed stamped envelope.

If you have any questions in this matter, please contact our office.

Sincerely,

Thelma Kremer
Legal Secretary to E. Bronson Potter
Sr. Deputy Prosecuting Attorney

/tk
Enclosures

cc w/enclos: Parties of record

RECEIVED
RECORDS MANAGEMENT
07 JUN 21 AM 8:19
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

CIVIL DIVISION

RECEIVED
RECORDS MANAGEMENT
07 JUN 21 AM 8:19
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION

WASTE CONNECTIONS OF
WASHINGTON, INC.,

Complainant,

v.

ENVIRO / CON & TRUCKING, INC., a
Washington corporation; ENVIROCON, INC.,
a corporation; and WASTE MANAGEMENT
DISPOSAL SERVICES OF OREGON, INC.,

Respondents.

Case No.: TG-071194

CLARK COUNTY'S PETITION TO
INTERVENE

COMES NOW, Clark County, Washington, and respectfully requests to intervene in the
above-entitled matter pursuant to WAC 480-07-355 and states as follows:

1. Clark County, Washington, ("County") is a political subdivision of the State of
Washington and, pursuant to RCW 70.95.090 and RCW 36.58.090, the County contracted with
Columbia Resource Co., LP, for the operation of a transfer and recycling station within Clark
County.

1 2. The conduct of the Respondents, as alleged in the complaint and petition filed
2 herein, violates Chapter 24.12 of the Clark County Code and adversely affects the public health,
3 safety and welfare of the citizens of the Clark County.

4 3. The County does not seek to broaden the issues addressed in this proceeding.

5 4. The name and address of the County's representative is:

6
7 E. Bronson Potter, Sr. Deputy Prosecuting Attorney
8 Prosecutor's Office – Civil Division
9 Clark County
10 PO Box 5000
11 Vancouver WA 98666-5000
12 Tele: (360) 397-2478
13 Fax: (360) 397-2184
14 E-mail: bronson.potter@clark.wa.gov

15 WHEREFORE, the County prays that it be allowed to participate as an intervenor in this
16 matter.

17 DATED this 19th day of June, 2007.

18 

19 E. Bronson Potter, WSBA #9102
20 Sr. Deputy Prosecuting Attorney
21 Of Attorneys for Intervenor Clark County

CERTIFICATE OF SERVICE

On this 19th day of June, 2007, I hereby certify that I caused true and correct copies of the foregoing *Clark County's Petition to Intervene* to be served upon the following parties in the manner(s) specified:

Attorney for Complainant Waste Connections of Washington, Inc.:

David W. Wiley	<input checked="" type="checkbox"/>	U.S. Mail
Jacob M. Downs	<input type="checkbox"/>	Facsimile
Williams Kastner	<input type="checkbox"/>	Federal Express
PO Box 21926	<input type="checkbox"/>	Hand Delivered
Seattle WA 98111-3926	<input checked="" type="checkbox"/>	E-mail
<u>DWiley@williamskastner.com</u>		

Respondent Waste Management Disposal Services of Oregon, Inc.:

Waste Management Disposal	<input checked="" type="checkbox"/>	U.S. Mail
Services of Oregon, Inc.	<input type="checkbox"/>	Facsimile
5330 NE Skyport Way	<input type="checkbox"/>	Federal Express
Portland OR 97218	<input type="checkbox"/>	Hand Delivered

Attorneys for Respondent Waste Management Disposal Services of Oregon, Inc.:

Polly L. McNeill	<input checked="" type="checkbox"/>	U.S. Mail
Summit Law Group	<input type="checkbox"/>	Facsimile
315 - 5 th Avenue S	<input type="checkbox"/>	Federal Express
Seattle WA 98104	<input type="checkbox"/>	Hand Delivered
<u>pollym@summitlaw.com</u>	<input checked="" type="checkbox"/>	E-mail

Respondent Enviro / Con & Trucking, Inc.:

Enviro / Con & Trucking, Inc.	<input checked="" type="checkbox"/>	U.S. Mail
PNB 509	<input type="checkbox"/>	Facsimile
26910 92 nd Avenue NW #C-5	<input type="checkbox"/>	Federal Express
Stanwood WA 98292	<input type="checkbox"/>	Hand Delivered

///////

1 *Registered Agent for Enviro / Con & Trucking, Inc.:*

2 RSC Corp. U.S. Mail
3 1201 - 3rd Avenue #3400 Facsimile
4 Seattle WA 98101-3034 Federal Express
5 Hand Delivered

6 *Respondent Envirocon, Inc.:*

7 Envirocon, Inc. U.S. Mail
8 3330 NW Yeon Avenue #240 Facsimile
9 Portland OR 97210 Federal Express
10 Vancouver WA 98660 Hand Delivered


11 *Registered Agent for Envirocon, Inc.:*

12 C T Corporation System U.S. Mail
13 1801 W Bay Drive NW #206 Facsimile
14 Olympia WA 98502 Federal Express
15 Hand Delivered

16 *Attorney for Intervenor Washington Refuse and Recycling Association.:*

17 James K. Sells U.S. Mail
18 Ryan Sells Uptegraft, Inc., PS Facsimile
19 9657 Levin Rd., NW #240 Federal Express
20 Silverdale WA 98383 Hand Delivered
21 jimsells@rsulaw.com E-mail

22 DATED this 19th day of June, 2007, at Vancouver, Washington.

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Thelma Kremer