

THE STATE OF NEW HAMPSHIRE
WASTE MANAGEMENT COUNCIL

Docket No. 20-14 WMC

Appeal of North Country Environmental Services, Inc.'s Type I-A Permit Modification for
Expansion (Permit No. DES-SW-SP-03-02) by Conservation Law Foundation

**CONSERVATION LAW FOUNDATION'S OBJECTION TO NORTH COUNTRY
ENVIRONMENTAL SERVICES, INC.'S MOTION FOR LEAVE TO FILE A REPLY**

Conservation Law Foundation ("CLF") objects to North Country Environmental
Service's ("NCES's") Motion for Leave to File a Reply in support of NCES's Motion to Stay
and respectfully requests that the Waste Management Council ("Council") deny NCES's motion.

CLF opposes NCES's Motion for the same reasons CLF opposed the similar motion
NCES filed in August. *See* CLF Objection to NCES Motion for Leave, Aug. 23, 2022. CLF
opposes NCES's continued attempt to litigate this appeal long after the hearing, Final Order, and
post-order motions. Since the Council issued its order in May, NCES has filed not only a Motion
for Rehearing, but also a Motion to Supplement the Record and to Hold an Evidentiary Hearing
and – now – a Motion to Stay. NCES should not be permitted to introduce interminable
arguments to litigate this appeal without end (and as an apparent tactic to delay a Council
decision while it continues operating Stage VI of its landfill), and the Council should deny
NCES's Motion to file yet another pleading.

Dated: October 4, 2022

Respectfully submitted,

CONSERVATION LAW FOUNDATION
By its attorneys,



Thomas F. Irwin (NH Bar No. 11302)
Heidi Trimarco (NH Bar No. 266813)

Conservation Law Foundation
27 North Main Street
Concord, NH 03301
(603) 225-3060
tirwin@clf.org
htrimarco@clf.org

CERTIFICATE OF SERVICE

I certify that the original and thirteen copies of the foregoing Objection was this 4th day of October, 2022 hand-delivered to the Waste Management Council and a copy of the foregoing is being sent by electronic mail to Joshua C. Harrison, Esq., Bryan K. Gould, Esq., Cooley Arroyo, Esq. and Morgan C. Tanafon, Esq.


Heidi H. Trimarco