

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
BEFORE THE ADMINISTRATOR**

In the Matter of:)	WRITTEN DEPOSITION FOR
)	SHERI BEMENT
ADAMAS CONSTRUCTION AND)	
DEVELOPMENT SERVICES, PLLC)	
)	
AND)	
)	
NATHAN PIERCE,)	
)	Docket No. CWA-07-2019-0262
Respondents.)	
)	
)	
_____)	

I, SHERI BEMENT, subject to penalty of perjury, declare the following answers to questions submitted by Complainant, U.S. Environmental Protection Agency:

1. What is your full legal name?

2. What is your address?

3. Please describe why you are unable to testify at the administrative hearing scheduled for the week of August 22, 2022, in Billings Montana.

4. During what dates did you work as General Manager for the Northern Cheyenne Utilities Commission?

5. Please describe the work you performed as General Manager for the Northern Cheyenne Utilities Commission.

6. Please describe the work you performed at the Lame Deer Publicly Owned Treatment Works.
7. Please describe the work relationship you had with Nathan Pierce and/or his company Adamas Construction and Development Services PLLC at the Lame Deer Publicly Owned Treatment Works.
8. Please describe the specific work for which you and/or the Northern Cheyenne Utilities Commission hired Nathan Pierce and/or Adamas Construction and Development Services PLLC to perform at the Lame Deer Publicly Owned Treatment Works.
9. Did you sign an agreement on behalf of the Northern Cheyenne Utilities Commission authorizing Nathan Pierce and/or Adamas Construction and Development Services PLLC to perform a sewage sludge removal and land application project on or around May 15, 2018?
10. Please describe the work Nathan Pierce and/or Adamas Construction and Development Services PLLC agreed to perform as part of the sewage sludge removal project.
11. Did the work that Nathan Pierce and/or Adamas Construction and Development Services PLLC performed as part of the sewage sludge removal project result in the generation of sewage sludge at the Lame Deer Publicly Owned Treatment Works?
12. Did the work that Nathan Pierce and/or Adamas Construction and Development Services PLLC performed as part of the sewage sludge removal project include

removal, dewatering, and derivation of concentrated sewage sludge from the Lame Deer Publicly Owned Treatment Works lagoon?

13. Did Nathan Pierce and/or Adamas Construction and Development Services PLLC use any Northern Cheyenne Utilities Commission equipment for the sewage sludge removal project?

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this _____ day of June, 2022.

(Date)

(Name, printed)

(Signature)

State of _____

County of _____

On this _____ day of _____, 20____, this record was signed before me by

_____.

Notary Public Signature

(Seal)

My appointment expires: _____