EXHIBIT 11

BACTs FOR DUST CONTROL IN THE LOT ITSELF

1. Sloped pen design greatly reduces standing water and wet spots. This allows for a more consistent control of pen surface moisture.
2. Computer controlled permanent sprinkler system will be utilized. The system will consist of 20 zones with an "on time" of 4 minutes each. This allows for a complete coverage or cycle of all the pens in 80 minutes. With approximately 71,500 gallons of water applied each cycle. The system is capable of nine cycles per day if needed.

Summary

Based on evaporation rates for packed manure on soil in an open beef feedlot and past experience, our proposed sprinkler system is more than adequate for the mitigation of fugitive dust in the cattle pens.

BEST MANAGEMENT PRACTICES FOR DUST CONTROL IN THE FEEDLOT ITSELF

1. Pen floor manure pack will be maintained at a 1 to 2 inch thickness. This is considered to be the optimum thickness for the control of both dust and odor (Razote, et al., 2006). This is repeatedly performed by tractors and box scraper implements.
2. Sprinkler system scheduling will maintain pen floor surface moisture levels within the optimum range of 25% to 40% (Lorimer, 2003).
3. During periods of extreme drought conditions, or in the event of a system failure, cross fencing can be implemented. This will increase stock density rates from approximately 167 square feet per animal up to 75 square feet per animal. This is a proven method to drastically reduce water usage for dust control. Implementation is made easy with the portable electric pen divider fencing system used at this facility. Cross fencing, in conjunction with the sprinkler system, will be more than adequate for the mitigation of fugitive dust in the pens, hospital, and shipping/receiving areas.
4. Fugitive dust will be controlled in the cattle alleyways with the use of water trucks. Since all cattle moving is usually scheduled and performed in the morning, cattle alleyways are watered only when and where needed. This amounts to 6.4 acres of floor area per day.
5. Fugitive dust will be controlled on the roadways by water trucks, as well. During periods of extreme drought conditions, Easterday Ranches is prepared to apply a dust control material on road surfaces. This, of course, is in addition to other accepted practices, such as driving 15 MPH or below and maintaining a good gravel surface on all roadways.

FUGITIVE DUST CONTROL PLAN FOR CONSTRUCTION OF FACILITY 1/2/2009 SUBMITTAL

Four Phases of Construction

1. Earthmoving and grading of the entry roads, fresh water pond, feed mill area, hospital area, and shipping/receiving area. Water will be applied to these areas, via water truck, to suppress dust during earthmoving. Straw mulch will then be used to

cover these areas as each is completed. The exception being the roadways, which will be finished with crushed rock.

2. Earthmoving and grading of the main pen areas, alleys, bunk areas, and lot roadways. Also, lining the fresh water pond, installing foundation for buildings and grain system. Water will be applied, via water truck, to areas being graded and straw mulch will be used to cover as each is completed.
3. Water, electrical, and communication lines will be laid. Concrete feed bunks, alleyways, aprons, and walls will be poured. Buildings and grain system will be erected. Earthmoving and grading of the catch basins, as well as ancillary areas will be finished. Water will be applied, via water truck, to these areas where earth is being moved or distributed to suppress dust. Straw mulch will also be laid down where needed.
4. All "finish" electrical, water, and communication will be performed. The boiler system will be installed as well as all finish work on the buildings and grain system. The fences and feed storage bunkers will be finished. The parking lots and all other roadways will be finished with crushed rock. The area around the feed mill will be paved and the untraveled areas will be planted to native grasses.

Note: During construction, water will be hauled on site from a nearby South Columbia Basin Irrigation District Source.

ODOROUS EMISSIONS CONTROL STRATEGIES IN THE LOT ITSELF

Design Features

1. The lot is engineered to prevent the accumulation of standing water in the pens, alleyways, and manure alleys.
2. Pen design is conducive to edge to edge manure removal.
3. Portable electric pen divider fencing systems can be easily removed to facilitate cleaning of manure build up.
4. All permanent fence lines can be easily reached with mechanized equipment for cleaning.

These design features are proven to greatly reduce odorous emissions and flies in beef cattle feedlots.

BMPs For Controlling Odors

1. An optimum moisture level of 25% to 40% moisture will be maintained in feed yard pens. At approximately 40% moisture, odor and flies become a problem. Dust can be a significant issue at less than 25% moisture at the pen floor surface. (Lorimar, 2003)
2. Frequent and proper manure harvesting will be used to maintain a 1-2 inch manure pack on the pen floor.
3. Frequent pen and alley grooming will maintain a smooth, firm surface.

Fugitive Dust Control Plan for Construction of the Facility

As was described earlier, the facility will be constructed in four (4) phases. Each portion of each phase having soil moved, or otherwise disturbed, will be limited to 14 acres or less of surface area at any one time. Up to 153,000 gallons of water per day will be applied, via water truck, to the above portions to control fugitive dust.

It is important that the peak daily water demand is met in order to combat fugitive dust on the described 14 acres. This demand is estimated as follows:

0.40" (ET_R) x 0.7 (XB0925 Dormant Season Evaporation Coefficient)
X (1 ft/12 in) x 14 acres x 43,560 ft^2/acre x 7.48 gallon/ft^3
= 106,437.25 gallons per day

The peak daily water demand will be met by the following applications:

1. Water will be sourced from a South Columbia Basin District canal located approximately 7.75 miles southwest of the construction site.

2. Water will be hauled to site by two (2) tanker trucks, each with a capacity of 8,500 gallons. Each tanker truck will make up to nine (9) round trips per day.

   2 (tanker trucks) x 9 (trips each) x 8,500 gallon (capacity, each truck)
   = 153,000 gallons per day

3. A portable water storage tank, with a capacity of 20,000 gallons, will be stationed on the construction site. The tanker trucks will deliver water to this storage tank.

4. Two (2) water trucks, each with a capacity of 4,500 gallons, will take on water from the portable storage tank and spread it onto the 14 acre portion of the site where earthmoving is taking place. Each water truck will make up to 17 trips per day.

   2 (water trucks) x 17(trips each) x 4,500 gallons (capacity, each truck)
   = 153,000 gallons per day