



Christy Marquez
Senior Counsel, Environmental & Safety Law

April 18, 2014

VIA FEDEX & EMAIL

Joseph Graham, Project Manager
State of Wisconsin
Department of Natural Resources
810 W. Maple Street
Spooner, WI 54801
Joseph.Graham@wisconsin.gov

Re: Request for Information

FACILITY NAME:	Former Unocal Petroleum Terminal
FACILITY BRRTS #s:	02-16-000336 and 03-16-000145
FACILITY ADDRESS:	2301 Winter Street, Superior, WI
WDNR BRRTS #s:	11-16-591466
Tax Parcel ID #s:	04-804-01035-00 and 04-804-01033-00

Dear Mr. Graham:

Please find the enclosed response (“Response”) to the above-referenced Request for Information (“RFI”) dated February 9, 2024, submitted to Chevron and received from the Wisconsin Department of Natural Resources (“WDNR”) via electronic mail delivered to Eric Hetrick on February 9, 2024. Although the Request was addressed to “Chevron,” Union Oil Company of California (“Unocal”) and Texaco Inc. (“Texaco”) are the only active legal entities with any connection to “Chevron” that have information responsive to the RFI. Therefore, all responses will be provided by Unocal and Texaco (together “Respondents”). Per Respondents’ request, WDNR agreed to grant two extensions until April 19, 2024. Accordingly, the Response is timely.

All documents responsive to the RFI are labeled CHEV000001 to CHEV001087, and the enclosed Exhibit 1 provides a guide showing which documents correlate to which numbered response. The e-mail communication of the Response will include a Microsoft OneDrive link to an electronic copy of the responsive documents. Respondents request that WDNR contact them before releasing any information contained in the Response or responsive documents provided in conjunction with the Response, pursuant to any requests for information under the Freedom of Information Act, the Wisconsin equivalent of the Freedom of Information Act, or otherwise.

Respondents’ objections to specific requests in the RFI are listed separately in the Response. Without waiving these objections, Respondents have proceeded in good faith to answer each of the numbered requests in the RFI. By answering the requests, Respondents do not waive, and expressly reserve, all of

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their objections as well as any objections they may have in the future. Respondents provide the Response based on information known to Respondents at this time. Respondents reserve the right to supplement the Response in the event that additional information is discovered.

WDNR should direct future correspondence in regard to this matter to my attention at the address provided above. Should you have any questions, comments, or concerns, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Christy Marquez". The signature is written in a cursive, flowing style.

Christy Marquez
Senior Counsel

Enclosures

cc: Eric Hetrick (by email)
William B. Hall (by email)
Lisa Majzoub (by email)

**Responding Parties Union Oil Company of California's, and Texaco Inc's
Responses to Wisconsin Department of Natural Resources' Request for Information**

Union Oil Company of California (hereinafter referred to as "Unocal"), and Texaco Inc. (hereinafter referred to as "Texaco"), together referred to as "Responding Parties" within this document, submit the following information in response to the State of Wisconsin Department of Natural Resources' Request for Information & Introduction to the Great Lakes Legacy Act dated February 9, 2024, (hereinafter referred to as the "RFI").

The RFI was addressed to "Chevron." However, Union Oil Company of California (Unocal) and Texaco Inc. (Texaco) are the only viable legal entities with any connection to "Chevron" that have responsive information to the RFI. Therefore, all responses will be provided by Responding Parties, Union Oil Company of California (Unocal) and Texaco Inc. (Texaco).

In accordance with the February 9, 2024, WDNR cover letter to the RFIs, the "Site" is defined as APN 04-804-1035-00 (1.56 acres) and APN 04-804-01033-00 (10.49 acres) together. To the best of Responding Parties' knowledge after reasonable search and inquiry, Unocal (or a predecessor company) leased property of 12.6 acres under various leases from 1938-2015. Based on information found by Responding Parties after reasonable search and inquiry (and backed up by documents provided to WDNR contemporaneously with Responding Parties' responses to the requests), those 12.6 acres correspond to APN 04-804-1035-00 (1.56 acres), APN 04-804-01034-00 (.57 acres) and APN 04-804-01033-00 (10.49 acres). For the purposes of all responses by Responding Parties to the 17 numbered requests, Responding Parties are treating all 12.6 acres comprised of APN 04-804-1035-00 (1.56 acres), APN 04-804-01034-00 (.57 acres) and APN 04-804-01033-00 (10.49 acres), as the "Site".

All responses below use the definitions contained in Wisconsin Statutes 292.01 for the meanings of "hazardous substance," "solid waste," "hazardous waste," and "environmental pollution."

Responding Parties' relevant former operations appear to have been conducted on property Unocal leased (part of which Texaco subleased), which included the Site and property outside of and beyond the Site, but contiguous to the Site. So, Responding Parties use the term "Unocal Leased Property" in the responses below to describe the area containing the property that Unocal leased, and that contained Responding Parties' former operations in the vicinity of and including the Site. A complete definition of "Unocal Leased Property" is part of the response to Request 3 below.

Responding Parties hereby incorporate the following objections by reference into the specific responses below.

1. An objection on the ground that a RFI is "OVERLY BROAD" is an objection that it is overly broad and not properly limited in time and/or scope.
2. An objection on the ground that a RFI is "NOT RELEVANT" is an objection that the information sought by the RFI is neither relevant to the Responding Parties, their predecessor companies, or their affiliates, nor is the RFI reasonably calculated to lead to the discovery of admissible evidence from the Responding Parties, their predecessor companies, or their affiliates.

2. An objection on the ground that a RFI is “VAGUE” is an objection that it is vague, ambiguous, uncertain, argumentative, unintelligible and/or indefinite.
3. An objection on the ground that a RFI is “CUMULATIVE” is an objection that the RFI seeks information that is not in responding party’s possession, custody, or control, or is already in the possession of plaintiff or its counsel, or equally available to requesting party or its counsel.
4. An objection on the ground that a RFI is “COMPOUND” means that the RFI asks two or more questions.
5. An objection on the ground that a RFI is “PUBLICLY AVAILABLE” means that the RFI asks for information that is available from public sources.
6. An objection on the ground that a RFI “CALLS FOR SPECULATION” means that the RFI asks for information that the respondent has no knowledge of or expects the respondent to guess about information or to opine whether or not information requested meets a certain legal definition.

In addition to those grounds for objection which are set forth specifically, Responding Parties object generally to these RFIs on the following grounds, and Responding Parties’ responses incorporate, and are to be read in light of, the following general objections and limitations:

1. Responding Parties’ investigation and discovery regarding these RFIs is ongoing. As such, the following responses are provided without prejudice to present further information responsive to these RFIs.
2. Responding Parties object to the RFIs and specifically to each RFI therein to the extent it purports to require Responding Parties to provide any information not in their possession, custody or control, or already in the possession of requesting party or its counsel, or equally available to requesting party or its counsel, on the grounds that such request is unnecessary, unduly burdensome and oppressive, constitutes annoyance, harassment and oppression of Responding Parties and goes beyond the obligations imposed or authorized by Wis. Stats §§ 292.11(7)(a), 292.11(8), and 292.31(1)(b).
3. Responding Parties further object to the RFIs because Wisconsin Department of Natural Resources (“WDNR”) has not established that Responding Parties or any of their predecessors, affiliates, or subsidiaries are potentially responsible parties for the potential environmental remediation at the Tower Avenue Slip, Superior, Wisconsin.
4. These responses are given without waiving, and expressly reserving: (a) all objections as to the competency, relevancy, speculative nature, materiality, and admissibility of the responses and the subject matter thereof as evidence for any purpose in any further proceeding in this matter, or in any other matter; and (b) the right to object to the use of such responses, or the subject matter thereof, on any ground in any further proceeding in this matter, or in any other matter.

THE DOCUMENTS ATTACHED TO THIS RFI RESPONSE ON BEHALF OF RESPONDING PARTIES MAY HAVE BEEN PREPARED BY PARTIES OTHER THAN

RESPONDING PARTIES OR THEIR PREDECESSOR COMPANIES OR AFFILIATES, AND RESPONDING PARTIES MAKE NO REPRESENTATION OR WARRANTY WHATSOEVER, EXPRESS OR IMPLIED, AS TO THE COMPLETENESS, CONTENT, ACCURACY OR SOURCE OF THE DOCUMENTS. WDNR SHOULD RELY ON THE DOCUMENTS AT ITS OWN RISK.

INFORMATION REQUEST

1. Identify the current owner and operator of the Site. State the dates during which the current owner and operator owned, operated, leased, or occupied any portion of the Site and provide copies of all documents evidencing such ownership, operation, lease, or occupation, including but not limited to purchase and sale agreements, deeds, leases, etc.

RESPONSE: *Responding Parties object to the scope of this request as overly broad, compound, vague, calling for speculation, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site was under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site.*

Notwithstanding, but without waiving these objections, to the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties believe that the current owner of the Site is BNSF Railway. To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties have no information that identifies the current operator of the Site if it is not BNSF Railway, nor do they have any information in their possession, custody or control that is further responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

2. Identify any persons who in addition to the owner/operator exercises actual control over the Site or who holds significant authority to control activities at the Site.

RESPONSE: *Responding Parties object to the scope of this request as overly broad, compound, vague, calling for speculation, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site was under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site.*

Notwithstanding, but without waiving these objections, To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties believe that the current owner of the Site is BNSF Railway. To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties have no information in their possession, custody, or control that identifies anyone who exercises actual control over the Site, or who holds significant authority to control activities at the Site, other than BNSF Railway. To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties do not have any further information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

3. Identify any legal or equitable interest that you now have, or previously had, in the Site and describe the nature of any such interest, including when, how, and from whom such interest was obtained as well as when, how, and to whom such interest was conveyed. Provide documentation evidencing the acquisition or conveyance of any identified interest.

RESPONSE: *Responding Parties object to the scope of this request as compound, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties reserve the right to supplement this response in the event that additional information is discovered. Notwithstanding, but without waiving the aforementioned objections, Responding Parties respond to this request as follows:*

As a reminder, in accordance with the February 9, 2024, WDNR cover letter to the RFIs, the "Site" is defined as APN 04-804-1035-00 (1.56 acres) and APN 04-804-01033-00 (10.49 acres) together. To the best of Responding Parties' knowledge after reasonable search and inquiry, Unocal (or a predecessor company) leased property in the amount of 12.6 acres under various leases from 1938-2015. Based on information found by Responding Parties after reasonable search and inquiry (and supported by documents provided to WDNR contemporaneously with Responding Parties' response to request 3 and other requests), those 12.6 acres correspond to APN 04-804-1035-00 (1.56 acres), APN 04-804-01034-00 (.57 acres) and APN 04-804-01033-00 (10.49 acres). For the purposes of the responses by Responding Parties contained in this document, Responding Parties are treating all 12.6 acres comprised of APN 04-804-1035-00 (1.56 acres), APN 04-804-01034-00 (.57 acres) and APN 04-804-01033-00 (10.49 acres), as the Site.

The Pure Oil Company ("Pure Oil") was a predecessor company to Unocal. It was formed and incorporated in the State of Ohio on April 9, 1914. Pure Oil merged into Unocal on July 16, 1965. Pure Oil was terminated on that same date.

A Delaware corporation was created to receive the assets of The Texas Company, a Texas corporation (the original "Texaco"), on April 19, 1927. This Delaware company was later merged into its parent, The Texas Corporation, on November 1, 1941. From November 1, 1941,

to April 30, 1959, that parent was called "The Texas Company". On April 30, 1959, the parent's name was changed to Texaco Inc.

To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties have determined that the following information found in documents being produced contemporaneously with this response may be responsive to request 3:

On June 1, 1938, Western Oil and Fuel Company began leasing 5.02 acres from Great Northern Railway Company (who on information and belief is a predecessor or subsidiary company of BNSF Railway). An unknown additional amount of acreage may have been added to that lease by amendment dated December 1, 1939. On August 16, 1944, the lease (as amended) was assigned to Pure Oil. This lease is believed to be known as lease 34720.

On May 24, 1938, Pure Oil began leasing 8.68 acres from Great Northern Railway Company. On July 1, 1939, such lease was amended to add an unknown amount of additional acreage. This lease is believed to be known as lease 34709.

On October 1, 1944, Pure Oil leased an undetermined but small amount of acreage from Great Northern Railway Company.

On August 10, 1955, by amendment to lease 34720, acreage believed to be equal to 1.1 acres or more (but possibly up to 4.56 acres) was reduced from the 34720 lease and subsequently leased by Great Northern Railway Company to The Texas Company (a predecessor of Texaco).

On May 29, 1958, a lease for 12.6 acres was entered into by Pure Oil and Great Northern Railway Company, replacing leases 34720 and 34709. That lease was in turn replaced by lease 243939 dated June 1, 1983, for 12.6 acres, between Unocal and Burlington Northern Railroad Company (who on information and belief is a predecessor or subsidiary company of BNSF Railway, and a successor to Great Northern Railway Company).

On information and belief, the 12.6 acres historically traced above comprises the "Site". However, because the information located by Responding Parties after reasonable search and inquiry is not completely clear about the history of the Site and what property makes up the Site, the following additional information found in documents being produced contemporaneously with this response may also be responsive to request 3:

To the best of Responding Parties' knowledge after reasonable search and inquiry, the property described below is believed to be immediately adjacent to the Site.

On June 1, 1938, Pure Oil began leasing .722 acres of property from The Lake Superior Terminal and Transfer Railway Company, a Wisconsin corporation (who on information and belief is a predecessor or subsidiary company of BNSF Railway). Either by separate lease dated June 1, 1938, or by amendment dated February 11, 1939, an additional 1.02 acres was added to the leased property. This lease (or leases) is believed to have been

replaced by a lease between the same parties for 1.74 acres, dated January 27, 1959. Additional adjoining or nearby acreage was added over the years (.32 acres by additional lease between the same parties in July of 1961, and 5.3 acres by additional lease between the same parties dated January 27, 1959).

All this various adjacent leased property together (including the 12.6 acre "Site") accumulated to total leased acreage by Unocal of what is believed to be 19.96 acres more or less, but could be up to 24.5 acres, (Altogether referred to within this document as the "Unocal Leased Property").

There were numerous leases over the years covering various parts of the Unocal Leased Property, and to the best of Responding Parties' knowledge according to documentation and records discovered after reasonable search and inquiry, by 1983 the Unocal Leased Property consisted of only the 12.6 acre parcel, the 1.74 acre parcel, the .32 acre parcel, and the 5.3 acre parcel (for a total of 19.96 acres more or less). According to documentation and records discovered after reasonable search and inquiry, to the best of Responding Parties' knowledge, the leases for 5.3 acres, 1.74 acres, and .32 acres were terminated by Unocal effective February 7, 2001. However, those terminations were disputed by BNSF. At that point, the Unocal Leased Property was reduced to just the "Site" (believed to be covered by lease 243939, dated June 1, 1983, for 12.6 acres). Lease 243939 was terminated effective June 30, 2015. However, please note that to the best of Responding Parties' knowledge after reasonable search and inquiry, all active business operations by Responding Parties on the Unocal Leased Property (including the Site) ceased in 1989.

After reasonable search and inquiry, Responding Parties have located copies of some (but not all) of the various leases previously discussed in this response to request 3. After reasonable search and inquiry, Responding Parties also located documentation and records with information regarding the leases previously discussed in this response to request 3. All information provided in this response to request 3, concerning the leases which Responding Parties have not been able to locate, comes from those documents. Such leases and documents are being provided to WDNR contemporaneously with this response.

According to documentation and records discovered after reasonable search and inquiry, to the best of Responding Parties' knowledge Unocal subleased two parcels to Williams Pipe Line Company (referred to within this document as "Williams"). The first parcel consisting of .25 acres of land was subleased to Williams on January 16, 1968, and appears to have continued to be subleased until 2004 (but was possibly subleased until at least 2008). The second parcel consisting of .10 acres of land was subleased to Williams on September 24, 1982, and appears to have continued to be subleased until 2004 (but was possibly subleased until at least 2008). The two subleased parcels together will be referred to within this document as the "Williams Subleased Property." To the best of Responding Parties' knowledge after reasonable search and inquiry, the Williams Subleased Property was located within the Unocal Leased Property. However, there is conflicting information in some of the documents and records located regarding whether the Williams Subleased Property was part of the property covered by lease 243939 (and thus believed to be part of the "Site"). There is some evidence that Williams (who on information and belief changed its name to Magellan Pipeline Company, LLC in 2003)

entered into a direct lease with BNSF in 2004 for the Williams Subleased Property. However, there is also conflicting evidence showing that Williams continued to sublease the Williams Subleased Property from Unocal until at least 2008.

To the best of Responding Parties' knowledge after reasonable search and inquiry, Pure Oil subleased a small portion of the Unocal Leased Property to Texaco Inc. on October 26, 1964. The subleased parcel will be referred to within this document as the "Texaco Subleased Property." To the best of Responding Parties' knowledge based on information discovered during Responding Parties' reasonable search and inquiry, the Texaco Subleased property was part of the 5.3 acres Pure Oil/Unocal leased from The Lake Superior Terminal and Transfer Railway Company by lease dated January 27, 1959. Thus, to the best of Responding Parties' knowledge based on information discovered during Responding Parties' reasonable search and inquiry, the Texaco Subleased Property was not located within the "Site". The exact termination date of the sublease to Texaco is unknown, but based on information discovered during Responding Parties' reasonable search and inquiry, the sublease to Texaco appears to have been terminated sometime before 1997. The Lake Superior Terminal and Transfer Railway Company consented to the sublease to Texaco by agreement dated February 2, 1965.

To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties do not have any further information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

The documents or records found during our file search which relate to, refer to, or concern this response are referenced in Exhibit 1.

4. Identify all hazardous substance discharges that have occurred at or from the Site and other actual or potential environmental pollution that has been found at the Site, including any hazardous substance discharge into, or environmental pollution found in, a subsurface disposal system or floor drain inside or under any building at the Site. Provide all documentation including reports and data related to hazardous substance discharges and actual or potential environmental pollution of soil, sediment, water (ground or surface) or air quality at or around the Site.

RESPONSE: *Responding Parties object to the scope of this request as vague, compound, calling for speculation, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property. Responding Parties reserve the right to supplement this response in the event that additional information is discovered. Notwithstanding, but without waiving the aforementioned objections, Responding Parties respond to this request as follows:*

To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties were able to determine that STS Consultants, Ltd. was contracted by Unocal to provide a final Site Investigation of the Unocal Leased Property, including the Site. The June 7, 1988, Phase I Site Investigation Report contains a summary of all the site investigations of both soil and groundwater. To the best of Responding Parties' knowledge after reasonable search and inquiry, a list of all known documented spills/releases/discharges that occurred at the Unocal Leased Property (including the Site) while it was under Unocal's or its predecessor's operation, is found in that report. Other reports prepared by STS Consultants, Ltd. on behalf of Unocal, and relating to the Unocal Leased Property, may also contain information that is responsive to request 4. To the best of Responding Parties' knowledge after reasonable search and inquiry, the STS June 7, 1988, Phase I Site Investigation Report, and all reports that were prepared by STS on behalf of Unocal relating to the Unocal Leased Property, were submitted to and should be on file with the WDNR. Those reports may be responsive to request 4, and are listed below:

- 1. Jun 7, 1988 – STS – Phase I Site Assessment of Unocal Superior Terminal*
- 2. July 17, 1990 – STS- Ph II Site Assessment of Unocal Superior terminal*
- 3. Oct 8, 1991 – STS – Preliminary Environmental Evaluation of Underground Storage Tank Area*
- 4. Jun 11, 1992 -STS – Groundwater Monitoring Report*
- 5. Jun 18, 1992 – STS – Corrective Action Plan for Cleanup of Waste Burial and Spill/Release Areas*
- 6. Jul 2, 1992 – STS – Environmental Site Assessment*
- 7. Feb 8, 1993 – STS – Documentation Report – Williams Pipeline Release*
- 8. Feb 8, 1993 – STS – Remedial Investigation*
- 9. Feb 24, 1993 – STS – Groundwater Monitoring Report*
- 10. Mar 18, 1993 -STS – Documentation Report for Underground Storage Tank Removal*
- 11. May 6, 1993 – STS – Documentation Report for Corrective Actions Performed at the Sludge Disposal Pits and Spill Release Sites*
- 12. Feb 3, 1994 -STS – Groundwater Monitoring Report June 1993*
- 13. Aug 26, 1994 - STS – Groundwater Monitoring Report June 1994*
- 14. Feb 2, 1995 – STS – Workplan for Additional Site Investigation*
- 15. Apr 24, 1995 -STS – Groundwater Monitoring Report Feb 1995*
- 16. Nov 22, 1995 – STS – Groundwater Monitoring Report*
- 17. Mar 1, 1997 – STS – Site Investigation Reports Part 1 and Part 2*
- 18. Mar 5, 1997 – STS - Site Investigation Report*

To the best of Responding Parties' knowledge after reasonable search and inquiry, Unocal's consultant, Arcadis, prepared reports on behalf of Unocal showing what remediation and restoration needed to occur and did occur on the Unocal Leased Property (including the Site),

done under the direction and control of WDNR. Those reports were submitted to and should be on file with the WDNR. Those reports may contain information that is responsive to request 4, and are listed below:

1. *Feb 25, 2002 – Arcadis – Ltr. Report Regarding Groundwater Conditions and Site-Specific Soil Conditions*
2. *Arp 4, 2002 – Arcadis – Remedial Actions Options Report*
3. *Jul 2, 2002 – Arcadis – Ltr. Report Former Truck Loading Rack Excavation*
4. *Jul 5, 2002 - Arcadis – Ltr Report Monitoring Well Installations*
5. *Aug 28, 2002 – Arcadis – Letter Report Proposed Approach to Separate Eligible and Ineligible Costs Associated with Historic Spill on Williams Pipeline Property*
6. *Sep 13, 2002 – Arcadis- Letter Report Proposed Approach to Separate Eligible and Ineligible Costs Associated with Sludge Disposal Pits*
7. *Various – Arcadis – Annual Status Reports*
 - a. *2003/2004 – May 14, 2004*
 - b. *2004/2005 – Apr 28, 2005*
 - c. *2005/2006 – Mar 6, 2006*

To the best of Responding Parties' knowledge after reasonable search and inquiry, the following reports prepared on behalf of Unocal were submitted to and should be on file with the WDNR. Those reports may contain information that is responsive to request 4, and are listed below:

1. *2006 – Gannett Fleming – Bio-Cell Closure Request*
2. *Sep 28, 2006 – WDNR- Bio-Cell Closure Request Approval*
3. *Various - Gannett Fleming - Annual Status Reports*
 - a. *2006 – Nov 21, 2006*
 - b. *2009 – Jul 31, 2009*
 - c. *2009 – May18, 2009*
 - d. *2010 – Jul 26, 2010*
 - e. *2010 – Sep 7, 2010*
 - f. *2010 – Dec 17, 2010*
 - g. *2011 - Jun 13, 2011*
 - h. *2011 – Sep 12, 2011*
 - i. *2011 – Dec 15, 2011*
 - j. *2012 – Jun 12, 2012*
 - k. *2012 Aug 29, 2012*
4. *Jan 28, 2013 - Gannett Fleming Inc. – Conditional Case Closure Request*
5. *Oct 8, 2013 – AECOM – Well Abandonment Summary*
6. *Dec 16, 2013 – AECOM – Transmittal Letter of Laboratory Analytical Results for Surface Water Samples (Collected Nov 20, 2013)*
7. *Oct 26, 2016 – WDNR – Final Case Closure*
8. *Various (Monthly) – Chevron – Monthly DMR Reports Supporting Wisconsin Pollutant Discharge Elimination System Permit – GP-WI-0046566 Terminated Jun 12, 2017*

To the best of Responding Parties' knowledge after reasonable search and inquiry, Williams had a spill of approximately 120,000 gallons of unleaded gasoline on October 31, 1981, which started on the Williams Subleased Property, but spread across other parts of the Unocal Leased Property and into the creek down to Tower Bay Slip an into St. Louise Bay.

To the best of Responding Parties' knowledge after reasonable search and inquiry, Williams had a spill of approximately 3100 gallons of No. 2 fuel oil on August 24, 1992, which started on the Williams Subleased Property, but appears to have impacted other parts of the Unocal Leased Property, and a creek bordering the east side of the Unocal Leased Property.

To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties do not have any further information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

The documents or records which relate to, refer to, or concern this response are referenced in Exhibit 1.

5. If you are the current owner and/or current operator of the Site, did you acquire or operate the Site or any portion of the Site after the discharge of any hazardous substance on or at the Site? Did you know or have reason to know of any discharge of any hazardous substance on or at the Site before acquiring or operating the Site? Describe all environmental investigations of the Site you undertook before acquiring or operating the Site and provide all documentation of investigations performed.

RESPONSE: *Responding Parties object to the scope of this request as compound, calling for speculation, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.*

Notwithstanding, but without waiving these objections, Responding Parties respond to this request as follows: Responding Parties are neither the current owner nor operator of the Site. Please refer to the responses to requests 3 and 4, and the documents referenced in those responses or provided contemporaneously with those responses, regarding Responding Parties' history at the Site, and any known information about Unocal's sublessees' history at the Site.

To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties do not have any further information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

6. Identify all prior owners of the Site. For each prior owner, further identify:
 - a. The dates of ownership,
 - b. All evidence showing that each identified owner controlled the Site; and
 - c. All evidence of any hazardous substance discharge or environmental pollution (including coal) at or from the Site and/or its solid waste units during the period that each identified owner owned the Site.

RESPONSE: *Responding Parties object to the scope of this request as compound, calling for speculation, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.*

Notwithstanding, but without waiving these objections, Responding Parties respond to this request as follows: Responding Parties were never owners of the Site. To the best of Responding Parties' knowledge after reasonable search and inquiry, the current owner of the Site is BNSF Railways, and past owners are either predecessors or subsidiaries of BNSF Railways. Please also refer to the responses to requests 3 and 4, and the documents referenced in those responses or provided contemporaneously with those responses, regarding Responding Parties' history at the Site, and any known information about Unocal's sublessees' history at the Site.

To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties do not have any further information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

7. Identify all prior operators of the Site, including lessors. For each prior operator, further identify:
 - a. The dates of operation,
 - b. The nature of prior operations at the Site,
 - c. All evidence that each identified operator controlled the Site; and
 - d. All evidence of any hazardous substance discharge or environmental pollution (including coal) at or from the Site and/or its solid waste units during the period that each identified operator operated the Site.

RESPONSE: *Responding Parties object to the scope of this request as compound, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor*

companies' operations on the Site or the Unocal Leased Property. Responding Parties reserve the right to supplement this response in the event that additional information is discovered. Notwithstanding, but without waiving these objections, Responding Parties respond to this request as follows:

Responding Parties can only respond to this request as it relates to their operations at the Site and the Unocal Leased Property between 1938 and 2015. To the best of Responding Parties' knowledge after reasonable search and inquiry, Pure Oil/Unocal leased the Site and the rest of the Unocal Leased Property for the purpose of developing a bulk fuel storage facility known as the "Unocal Superior Terminal." The Unocal Superior Terminal provided gasoline and light oils to the Duluth/Superior area from the 1930's until November 1989, at which time all operations ceased. Features at the Unocal Superior Terminal included 9 aboveground storage tanks (ASTs) with a capacity of approximately 55,000 barrels each (21MM gallons total), two underground storage tanks (UST's), a two bay truck loading area (loading rack), and a one story office building (approx. 3000 sf). Unocal Superior Terminal features also included associated piping and utilities.

Upon discontinuing operations at the Unocal Leased Property, to the best of Responding Parties' knowledge after reasonable search and inquiry, the following activities took place:

- 1989 – Unocal drained/removed content/cleaned 10 AST's, piping and associated equipment.*
- Sept 1992-Jan 1993 Industrial Dismantling Services took down the 10 ASTs and removed associated piping.*
- Fall 1993- Summer of 1994 Industrial Dismantling removed the remaining surface features – Office building, truck loading rack, 2 small AST's, and an Oil/Water separator and associated piping.*
- Piping under the BNSF rail was not removed but grouted in place.*
- June -Aug 1996 Union Pacific Railroad (UPRR) built a spur track across part of the Unocal Leased Property near AST #10.*
- Nov-Dec 1996-Berms between ASTs were pushed down and the Unocal Leased Property was leveled.*
- Between 1989 and 2013 various environmental remediation and restoration activities occurred on the Unocal Leased Property, and on October 28, 2016, Chevron Environmental Management Company (an affiliate of Responding Parties, who led the cleanup and restoration efforts on the Unocal Leased Property- including the Site), received site closure from WDNR for the Unocal Leased Property- including the Site.*

By letter, dated May 9, 2002, the Wisconsin Department of Commerce ("WDOC") requested data from Unocal on the former operations at the Unocal Superior Terminal. Unocal, through its consultant, Arcadis, responded with a report, dated July 15, 2002 (two volumes). This report provides comprehensive information on infrastructure (tanks), disposal of the tanks, residual contents, and impacted soils beneath and around the tanks. Disposal manifests were also presented. A copy of the report (two volumes) is being provided to WDNR contemporaneously with this response.

Please also refer to the responses to Requests 3 and 4, and the documents referenced in those responses or provided contemporaneously with those responses.

Based on information contained in the subleases, and other information discovered during Responding Parties' reasonable search and inquiry, Williams used the Williams Subleased Property for the exclusive purpose of a metering station, relief tank and a pumping station for an underground petroleum pipeline distribution system.

Based on information contained in the subleases, and other information discovered during Responding Parties' reasonable search and inquiry, Texaco used the Texaco Subleased Property for the purpose of constructing, maintaining, operating, and removing a 20,000 gallon slop tank.

Based on information discovered during Responding Parties' reasonable search and inquiry, by lease dated November 1, 1955, the Texas Company (a predecessor to Texaco) may have leased from the Great Northern Railway Company 4.56 acres located adjacent to the Unocal Leased Property. On information and belief, such property was later leased to Murphy Oil Company.

Based on information discovered during Responding Parties' reasonable search and inquiry, Williams may have owned property adjacent to the East of the Unocal Leased Property.

Based on information discovered during Responding Parties' reasonable search and inquiry, it appears that Burlington had operations on part of the Site.

Based on information discovered during Responding Parties' reasonable search and inquiry, it appears that UPRR had operations on part of the Site.

Please also refer to the responses to requests 4 and 8, and the documents referenced in those responses or provided contemporaneously with those responses.

To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties have no further knowledge or information in their possession, custody, or control regarding other or prior operators at the Site or any other information in their possession, custody, or control that is responsive to this Request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

The documents or records which relate to, refer to, or concern this response are referenced in Exhibit 1.

8. Describe the nature of your activities, business, or operations at the Site with respect to generating, transporting, storing, treating, or disposing hazardous substances or solid or hazardous waste (including coal) at the Site.

RESPONSE: *Responding Parties object to the scope of this request as vague, compound, calling for speculation, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property*

Responding Parties reserve the right to supplement this response in the event that additional information is discovered. Notwithstanding, but without waiving these objections, Responding Parties responds to this request as follows:

To the best of Responding Parties' knowledge after reasonable search and inquiry, the Unocal Leased Property was developed by Unocal as a bulk fuel storage facility known as the "Unocal Superior Terminal" which provided gasoline and light oils to the Duluth/Superior area from the 1930's until 1989, when Unocal ceased operations at the Unocal Superior Terminal and on the Unocal Leased Property. The Arcadis report dated July 15, 2002, (two volumes) and provided contemporaneously with this response, provides comprehensive information on infrastructure (tanks), disposal of the tanks, residual contents, and impacted soils beneath and around the tanks. Disposal manifests were also presented.

The STS March 5, 1997, Phase I Site Investigation Report prepared on behalf of Unocal may also have information responsive to this request 8. Such report was submitted to and should be on file with the WDNR.

The Arcadis reports prepared on behalf of Unocal may also have information responsive to this request 8. Such reports were submitted to and should be on file with the WDNR.

Please also refer to the responses to requests 4 and 7, and the documents referenced in those responses or provided contemporaneously with those responses.

Based on information contained in the subleases, and other information discovered during Responding Parties' reasonable search and inquiry, Texaco used the Texaco Subleased Property for the purpose of constructing, maintaining, operating, and removing a 20,000 gallon slop tank.

To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties have no further knowledge or information in their possession, custody, or control regarding the potential generating, transporting, storing, treating, or disposing of hazardous substances or solid or hazardous waste (including coal) at the Site. To the best of Responding

Parties' knowledge after reasonable search and inquiry, Responding Parties have no further knowledge or information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

The documents or records which relate to, refer to, or concern this response are referenced in Exhibit 1.

9. If any hazardous substances or solid or hazardous waste (including coal) was ever generated, transported, stored, treated, or disposed of at the Site, identify and provide all documentation which relates to: (a) the type, quantity, chemical composition, characteristics and physical state (e.g., solid, liquid) of hazardous substances or solid or hazardous waste generated, transported, stored, treated or disposed of at the Site and the dates that such activities occurred; (b) the identity of all persons who generated,

transported, treated, stored, or disposed of such substances or waste at the Site; and (3) the identity of all subsidiary or parent corporations of identified persons.

RESPONSE: *Responding Parties object to the scope of this request as vague, compound, overly broad, calling for speculation, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property. Responding Parties reserve the right to supplement this response in the event that additional information is discovered. Notwithstanding, but without waiving these objections, Responding Parties respond to this request as follows:*

Responding Parties can only respond to this request as it relates to their operations at the Site or the rest of the Unocal Leased Property between 1938 and 2015. To the best of Responding Parties' knowledge after reasonable search and inquiry, any waste materials that were generated as part of Unocal's site closure activities between 1989 and 2013 were transported offsite to the appropriate facility where they were treated and/or properly disposed of.

Please also refer to the responses to requests 4, 7 and 8, and the documents referenced in those responses or provided contemporaneously with those responses.

To the best of Responding Parties' knowledge after reasonable search and inquiry, Responding Parties have no further knowledge or information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

10. Describe with specificity all occurrences where a Site owner, operator, or person in control over the Site was determined by a federal, state, or local authority to have violated any environmental law or where any environmental violation or deficiency was discovered at the Site, including any violation or deficiency that resulted in the issuance of a citation or the commencement of any enforcement or legal action. Identify the federal, state, and local authorities involved in each identified occurrence. Provide all documentation related to each identified occurrence.

RESPONSE: *Responding Parties object to the scope of this request as vague, compound, calling for speculation, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property. Responding*

Parties reserve the right to supplement this response in the event that additional information is discovered. Notwithstanding, but without waiving the foregoing objections, Responding Parties respond to this request as follows:

Responding Parties can only respond to this request as it relates to their operations on the Site and the rest of the Unocal Leased Property between 1938 and 2015. To the best of Responding Parties' knowledge after reasonable search and inquiry, no such violation or deficiency, including a violation or deficiency that resulted in the issuance of a citation or the commencement of any enforcement or legal action, involving the Responding Parties or their predecessors or affiliates, happened at the Site or the rest of the Unocal Leased Property while Responding Parties' or their predecessor companies were leasing the Unocal Leased Property (including the Site). As a result, no responsive documents were found or are known by Responding Parties to exist.

Please also refer to the responses to requests 4, 7, 8, and 9, and the documents referenced in those responses or provided contemporaneously with those responses, for a discussion of WDNR directed remediation and restoration activities that occurred at the Site and the Unocal Leased Property.

Documents provided in response to requests 4, 7, and 8, may contain information that could be responsive to request 10, regarding third-party entities that are not Responding Parties.

Responding Parties have no further knowledge or information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

11. Provide a list of all local, state, and federal environmental permits ever granted for the Site or any part thereof (e.g., Resource Conservation and Recovery Act (RCRA) permits, National Pollutant Discharge Elimination System (NPDES) permits, etc.).

RESPONSE: *Responding Parties object to the scope of this request as vague, compound, calling for speculation, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property.*

Notwithstanding, but without waiving the foregoing objections, Responding Parties respond to this request by stating that the information sought in this request is already available to the WDNR through its own records and other public agency records. Responding Parties further respond to this request as follows:

Responding Parties can only respond to this request as it relates to their operations on the Site or the rest of the Unocal Leased Property between 1938 and 2015. To the best of Responding Parties' knowledge after reasonable search and inquiry, the following permits were granted for the Site while it was under Unocal's operation: AST and UST registrations, the Wisconsin Pollution Discharge Elimination System (WPDES) Permit No. WI-004656603 for wastewater discharge, and WDNR Erosion Control Permit (2002).

The documents or records which relate to, refer to, or concern this response are referenced in Exhibit 1.

Responding Parties have no further knowledge or information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

12. Did the Site ever file a Hazardous Waste Activity Notification under the Resource Conservation and Recovery Act (RCRA)? If so, provide documentation of such notification.

RESPONSE: *Responding Parties object to the scope of this question as compound, calling for speculation, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property. Responding Parties reserve the right to supplement this response in the event that additional information is discovered. Notwithstanding, but without waiving these objections, Responding Parties respond to this request as follows:*

Responding Parties can only respond to this request as it relates to their operations on the Site or the rest of the Unocal Leased Property between 1938 and 2015. To the best of Responding Parties' knowledge after reasonable search and inquiry, no Hazardous Waste Activity Notification under the Resource Conservation and Recovery Act (RCRA) was ever filed for the Unocal Leased Property, or the Unocal Superior Terminal's operation at the Unocal Leased Property, or the Site, while the Unocal Leased Property and the Site were being leased by Responding Parties' or their predecessor companies (1938-2015).

Responding Parties have no further knowledge or information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

13. Did the Site ever have "interim status" under the Resource Conservation and Recovery Act (RCRA)? If so, and the Site does not currently have interim status, describe the circumstances under which the Site lost interim status.

RESPONSE: *Responding Parties object to the scope of this question as compound, calling for speculation, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property. Responding Parties reserve the right to supplement this response in the event that additional information is discovered. Notwithstanding, but without waiving these objections, Responding Parties respond to this request as follows:*

Responding Parties can only respond to this Request as it relates to their operations on the Site or the rest of the Unocal Leased Property between 1938 and 2015. To the best of Responding Parties' knowledge after reasonable search and inquiry, neither the Unocal Leased Property, the Site, nor the Unocal Superior Terminal's operation at the Unocal Leased Property, had an "interim status" under the Resource Conservation and Recovery Act (RCRA) during the time that the Unocal Leased Property and the Site were being leased by Responding Parties' or their predecessor companies (1938-2015).

Responding Parties have no further knowledge or information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

14. Provide the following information about the Site, if applicable:
 - a. Property boundaries, including a written legal description,
 - b. Location of underground utilities (telephone, electrical, sewer, water main, etc.),
 - c. Surface structures (e.g., buildings, tanks, etc.),
 - d. Groundwater wells, including drilling logs,
 - e. Storm water drainage systems, and sanitary sewer systems, past and present, including septic tank(s), subsurface disposal field(s), and other underground structures; and where, when and how such systems are emptied,
 - f. All additions, demolitions or changes of any kind on, under or about the Site, its physical structures or to the property itself (e.g., prior removal or excavation of contaminated soil or sediment); and any planned additions, demolitions or other changes to the site,
 - g. Geology and hydrogeology at and around the Site,
 - h. Maps and drawings of the Site depicting the property boundaries and property features identified above; and
 - i. Photographs of the Site, past and present, including aerial photographs.

RESPONSE: *Responding Parties object to the scope of this question as compound, calling for speculation, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their*

predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property. Responding Parties reserve the right to supplement this response in the event that additional information is discovered. Notwithstanding, but without waiving these objections, Responding Parties respond to this request as follows:

Responding Parties can only respond to this Request as it relates to their operations at the Site or the rest of the Unocal Leased Property between 1938 and 2015. To the best of Responding Parties' knowledge after reasonable search and inquiry, the following information is responsive to request 14:

Provide the following information about the Site, if applicable:

- a) Property boundaries, including a written legal description,

All property boundaries, to the extent they are known by Responding Parties, are described in the leases which have been provided contemporaneously with the response to request 3. Based on information found in the leases, which have been provided contemporaneously with the response to request 3, the Site is believed to be located within the City of Superior, County of Douglas, and State of Wisconsin, in the northwest quarter (NW ¼) of Section fifteen (15), Township forty-nine (49) north, Range fourteen (14) west.

- b) Location of underground utilities (telephone, electrical, sewer, water main, etc.),

To the best of Responding Parties' knowledge after reasonable search and inquiry, all underground utilities were removed when Unocal removed the infrastructure from the site.

- c) Surface structures (e.g., buildings, tanks, etc.),

To the best of Responding Parties' knowledge after reasonable search and inquiry, Unocal Leased Property surface structures included 10 AST's, office building, oil /water separator, and two bay truck loading racks.

Please also refer to the responses to Requests 4, 7 and 8, and the documents referenced in those responses or provided contemporaneously with those responses.

- d) Groundwater wells, including drilling logs,

To the best of Responding Parties' knowledge after reasonable search and inquiry, information regarding groundwater wells and their drilling logs are contained in various reports identified in the June 7, 1988, STS Site Assessment Report. These reports are on file with the WDNR.

- e) Storm water drainage systems, and sanitary sewer systems, past and present,

including septic tank(s), subsurface disposal field(s), and other underground structures; and where, when and how such systems are emptied,

To the best of Responding Parties' knowledge after reasonable search and inquiry, information contained in Final Closure Report from WDNR (Oct 26, 2016) contains figures and drawings which indicate that storm water was collected in the Northern Storm Water Pond and Holding Pond near Areas 6 and 7 (near former AST #7). A small creek/swale traverses the Unocal Leased Property between tanks #7 and #8. A 48-inch concrete storm sewer feeds into this creek/swale from offsite and runs east to west. Figures from the Final Closure Report also indicate there was a septic tank on the northwest corner of the office building. No other information regarding the septic system has been found.

As previously mentioned in other responses, all piping and tanks were emptied and cleaned before they were removed from the Unocal Leased Property.

Please also refer to the responses to Requests 4, 7 and 8, and the documents referenced in those responses or provided contemporaneously with those responses.

f) All additions, demolitions, or changes of any kind on, under or about the Site, its physical structures or to the property itself (e.g., prior removal or excavation of contaminated soil or sediment); and any planned additions, demolitions or other changes to the site,

To the best of Responding Parties' knowledge after reasonable search and inquiry, this information is contained in reports previously mentioned and on file with the WDNR.

Please also refer to the responses to Requests 4, 7 and 8, and the documents referenced in those responses or provided contemporaneously with those responses.

g) Geology and hydrogeology at and around the Site,

To the best of Responding Parties' knowledge after reasonable search and inquiry, Groundwater at the site is reported to move generally northerly on the southern end of the site and westerly on the northern end of the site. Prior to Unocal's remedial work, groundwater moved south to north. Geologic cross-sections contained in the STS Site Investigation Report(s) from March 1997, indicate the site is underlain by 15-30 feet of clay sediments which thin on the northern end of the property. Under the clay sediments are sands and silts with clay stringers. The sands and silts extend to the maximum depth reviewed approximately 40 feet below ground surface. Groundwater appears to be around an elevation of 610 ft mean sea level (MSL)

h) Maps and drawings of the Site depicting the property boundaries and property features identified above; and

To the best of Responding Parties' knowledge after reasonable search and inquiry, maps

are contained in the STS Site Assessment Report(s), and other documents on file with the WDNR. Maps and drawings are also being provided in the documents being produced contemporaneously with this response to request 14. In addition, there may be responsive documents that are being provided contemporaneously with responses to other numbered requests.

- i) Photographs of the Site, past and present, including aerial photographs.

To the best of Responding Parties' knowledge after reasonable search and inquiry, photographs and aerial photographs are contained in the STS Site Assessment Report(s), and other documents on file with the WDNR. Photographs are also being provided in the documents being produced contemporaneously with this response to request 14. In addition, there may be responsive documents that are being provided contemporaneously with responses to other numbered requests.

Please also refer to the responses to requests 3, 4, 7, and 8, and the documents referenced in those responses or provided contemporaneously with those responses.

Responding Parties have no further knowledge or information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered. The documents or records which relate to, refer to, or concern this response are referenced in Exhibit 1.

15. Describe the conditions of any physical plant facility at the Site during the years each operator operated at the Site, including the status of equipment (operating or dormant), general condition of the facility (e.g., leaking pipes, corroded drain or new piping installed), quality of maintenance (e.g., equipment in disrepair or inspected monthly), adherence to procedures (improper handling of chemicals, incomplete/absent policies, quality of supervision), and management of the plant.

RESPONSE: *Responding Parties object to the scope of this question as compound, calling for speculation, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property. Responding Parties reserve the right to supplement this response in the event that additional information is discovered. Notwithstanding, but without waiving these objections, Responding Parties respond to this request as follows:*

Responding Parties can only respond to this request as it relates to their operations at the Site or the rest of the Unocal Leased Property between 1938 and 2015.

Please refer to the responses to requests 4, 7, and 8, and the documents referenced in those responses or provided contemporaneously with those responses.

Responding Parties have no further knowledge or information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

16. Are you or your consultants planning to perform any investigations of the soil, sediment, water (ground or surface), geology, hydrology or air quality on or about the Site? Provide all documentation concerning any investigation you have conducted or plan to conduct at or around the Site.

RESPONSE: *Responding Parties object to the scope of this question as compound, calling for speculation, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property. Responding Parties reserve the right to supplement this response in the event that additional information is discovered. Notwithstanding, but without waiving these objections, Responding Parties respond to this request as follows:*

Responding Parties can only respond to this request as it relates to their operations at the Site or the rest of the Unocal Leased Property between 1938 and 2015. Unocal received closure at the Site in 2015. No additional investigations or work will be performed.

Responding Parties have no further knowledge or information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.

17. Describe all potential pathways for migration of contamination, including airborne deposition, drainage improvements, utility corridors, sediments, bedrock and permeable material or soil along which dust/particulate, vapors, and free product may flow as well as potential pathways contaminated water may flow.

RESPONSE: *Responding Parties object to the scope of this question as compound, calling for speculation, overly broad, and cumulative. Responding Parties further object to the scope of this request to the extent it seeks information that is publicly available. Responding Parties further object to the scope of this request to the extent it seeks information outside of the time period in which the Site and the Unocal Leased Property were under Responding Parties' or their predecessor companies' operation. Responding Parties further object to the scope of this request to the extent it seeks information that is not relevant to Responding Parties' or their predecessor companies' operations on the Site or the Unocal Leased Property. Responding Parties reserve*

the right to supplement this response in the event that additional information is discovered. Notwithstanding, but without waiving these objections, Responding Parties respond to this request as follows:

To the best of Responding Parties' knowledge after reasonable search and inquiry, a receptor survey is contained in the STS Site Investigation Reports from March 1997. Potential receptor pathways, including soil vapor and groundwater, were evaluated in accordance with WDNR guidelines. The probability of vapor or groundwater migration was determined to be low.

Please also refer to the responses to requests 4, 7, and 8, and the documents referenced in those responses or provided contemporaneously with those responses.

Responding Parties have no further knowledge or information in their possession, custody, or control that is responsive to this request. Responding Parties reserve the right to supplement this response in the event that additional information is discovered.