

Berkes Crane Robinson Seal

L A W Y E R S

ALINA ABGARYAN
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June 29, 2017

VIA FIRST CLASS MAIL

Dorothy Riehle
FOIA Officer
Richland Operations Office
P. O. Box 550
Mail Stop A7-75
Richland, WA 99352

Re: ***FREEDOM OF INFORMATION ACT REQUEST***

Dear Ms. Riehle:

Please allow this correspondence to serve as a Freedom of Information Act (FOIA) (5 U.S.C. §552 *et seq.*) request pertaining to the documents described below. This request relates to the Elk Hills Oil Field in Kern County, California.

Please note that this request relates to a lawsuit, the trial date of which is set for October 16, 2017. Accordingly, I respectfully request that this FOIA request be given expedited attention. Please contact me as soon as possible to discuss any options we may have in expediting this request.

Any and all records or documents¹ related to construction projects at the Elk Hills Oil Field in Kern County, California in the 1970s. This request includes, but is not

¹ The term "records" and the term "documents" are used in the broadest sense possible and mean the original and any non-identical copy (e.g, any copy which is different from the original in any way, including but not limited to because of notations thereon or attached thereto or otherwise) of any written, recorded, printed, typewritten, or handwritten matter of any kind or nature (however produced, reproduced, or recorded), including but without limitation all contracts, drafts of contracts, leases, subleases, instruments, agreements, drawings, hearing transcripts, reports, summaries of investigations, or negotiations, opinions or reports of consultations, consultants, or proposed experts, press releases, letters, telegrams, e-mail, facsimiles, memoranda, reports (preliminary and final) studies, samples, reports, testing protocols, diaries, logs, maps, pamphlets, notes, charts graphs, calendars, schedules, tabulations, analysis, records, statistical information, accumulations, books, magazines, telephone bills, minutes, summaries, or other records of meetings, conversations, and hearings of any kind, photographs, slides, videotapes, film impressions, data, data compilations, computer files, computer documents, audiotape recordings, magnetic tapes, sound or mechanical reproductions, and computer printouts, now or at any time in the Department of Energy's possession, custody, or control or known or believed by the Department of Energy to exist or have existed. "Record" or "document" also includes any underlying documents used to create summaries or other reports of financial or other data.

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limited to, any and all facility building plan documents, architectural plans, photographs, specifications, drawings, material lists, blueprints, change orders, prime or general contracts, or subcontracts.

Any and all records or documents related to the production of oil at Elk Hills Oil Field in Kern County, California during the 1970s. This request includes, but is not limited to, any and all facility building plan documents, architectural plans, photographs, specifications, drawings, material lists, blueprints, change orders, prime or general contracts, or subcontracts.

Any and all documents which identify the name of any entity involved in any construction or in the production of oil at the Elk Hills Oil Field in Kern County, California during the 1970s. This request includes, but is not limited to, any and all architects, general contractors, subcontractors, trade unions, labor organizations. It also includes, but is not limited to, any materials, or equipment suppliers whether wholesale suppliers, product manufacturers, and/or shipping/freight companies.

Any and all documents which identify the names and/or types of any construction materials used in construction of the Elk Hills Oil Field in Kern County, California during the 1970s. This request includes, but is not limited to, any and all exterior or interior wall finishing materials/products (including but not limited to stucco, drywall, etc...), any and all fireproofing materials, any and all heating/venting/air-conditioning (HVAC) materials, any and all flooring materials, roofing materials, boiler materials, pipe and pipe insulation materials, and electrical materials.

Any and all documents which identify the names and/or types of materials used in the production of oil at the Elk Hills Oil Field in Kern County, California during the 1970s. This request included, but is not limited to, any and all equipment, drilling, muds, acids, solvents, pipe and pipe insulation materials, gaskets, pumps, packing, and valves.

Any and all documents related to any asbestos abatement involving any of the work done at Elk Hills Oil Field in Kern County, California.

We request that all responsive materials be sent directly to my attention at the address provided at the top of the letterhead. Additionally, we are happy to reimburse the Department for all

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reasonable costs associated with this request up to an initial amount of \$250.00. If the costs exceed this amount, please contact me as soon as possible.

If you have any questions, or need any clarification in regards to the above-documents, please do not hesitate to contact me directly at (213) 955-1150, or via email at aabgaryan@bcrlaw.com. I sincerely appreciate your attention to this matter.

Very truly yours,



ALINA ABGARYAN

Paralegal

BERKES CRANE ROBINSON & SEAL LLP

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