Oklahoma Poultry Litigation

Privilege Log

ODEQ

	Date	Author	Is Author a Lawyer?	Recipient(s)	Type of Document	General Subject Matter of the Document	Privilege Asserted *FRCP*
1	12-22-2000	Haggins, Ramona	Yes	Maisch, Don (cc: Coffey, Kay; McClain, Sandra)	Email	Receipt of the return of the NOV; Dwight Mission Presbyterian Camp P-2006832	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
2	01/04/2001	Higgins, Ramona	Yes	Coffey, Kay; Maisch, Don (cc: Sandra McClain	Email	Dan Wells received violation letter; Dwight Mission Presbyterian Camp P-2006832	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
3	03/12/1998	Mark Coleman	no	Drew Edmondson	letter	DEQ's concerns with the proposed enforcement action against Simmons Industries, Inc	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
4	02/29/2000	Jimmy D. Givens	yes	Janet Stewart	letter	Sierra Club intent to file suit against Seaboard Corporation and Shawnee Funding Limited Partnership	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
5	07/07/2000	Craig Kennamer	yes	Teena Gunter	letter	certain regulatory violations at a facility under the jurisdiction of the ODA	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
6	06/25/2003	Donald Maisch	yes	Alvin Gutterman	letter	letter from John Ellis to Rahmat Khoda, DEQ dated 06/10/2003	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
7	07/08/2003	Martha Penisten	yes	Barry Stephenson	letter	9 CD's from Kelly Hunter=Burch relating to the regulation of hazardous waste of Sequoyah Fuels Site in Gore, OK	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
8	09/05/2003	Mista Turner	yes	Jeanette Postman	letter	Department Response submitted in the lieu of the Standard Liability Incident Report	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
9	3/13/2003	Materials and Chemistry Laboratory Inc.	No	Attorney General's Office of the State of Oklahoma	Report	Review and Evaluation of Sequoyah Fuels Facility Reclamation Plan	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

Legal Body

Exhibit 13

Oklahoma Poultry Litigation

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10	7/17/04	Michael Navetta	No	Oklahoma Attorney General's Office	Reclamation Plan	Sequoyah Fuels Corporation Reclamation Plan, Analysis of Technical Issues	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
11	8/6/04	Trevor Hammons	Yes	Dave Smit	Email	Email re: Sequoyah Fuels discussion	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
12		Oklahoma Attorney General's Office, ODEQ	Yes	Oklahoma Department of Environmental Quality	Notes	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
13	8/26/04	James Barwick	Yes	Dave Smit	Email	Email re: Items for Dave Smit	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
14		Sequoyah Fuels	Yes	Oklahoma Attorney General's Office, Cherokee Nation	Draft of SFC Actions	SFC Actions for Settlement Issues List for Cell Design and Groundwater	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
15		Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	Yes	Oklahoma Department of Environmental Quality, Sequoyah Fuels	Notes	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
16	8/26/04	James Barwick	Yes	Dave Smit	email	Email re: Radiation Questions/Issues for Discussion and Resolution	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
17		Oklahoma Attorney General's Office	Yes			Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
18	8/16/04	Kelly Burch	Yes	Jeannine Hale, Al Gutterman	Memo	memo re: Remaining Unresolved Settlement Items	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
19	9/2/04	John Ellis	No	Dave Smit	Fax	fax re: Settlement Discussions	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

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20	8/16/04	Don Barett	No	Dave Smit	Email	Email re: Sequoyah Fuels discussion	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
21	3/16/03	David E. Smit	No	Oklahoma Attorney General's Office	Memo	Memo re: Review of the Sequoyah Fuels Reclamation Plan	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
22	10/3/03	Martha Penisten	Yes	Mary Jane Calvey,Dave Smit, Ray Roberts, Carl Parrott, Afsaneh Jabbar, Mike Broderick, Don Maisch	Email	Email re: SFC	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
23		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Hazardous Constituents in Yellowcake Received at SFC	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
24	3/13/03	Steven Kopp, Dr. Shin Park, William Krummen, Richard R. Lee	Yes	Oklahoma Attorney General's Office	Memo	Review and Evaluation of Sequoyah Fuels Facility Reclamation Plan	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
25		Kelly Brown	Yes	Oklahoma Department of Environmental Quality	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
26		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues/ Raffinate sludge	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
27		Kelly Brown	Yes	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
28		Oklahoma Department of Environmental Quality	unknown	Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

29	6/2/04	Kelly Burch	Yes	Dave Smit, Don Maisch, Martha Penisten, Mary Jane Calvey, Mike Broderick, Afsaneh Jabbar, Amil Lyon, Carl Parrott, Mark Conley, Don Barrett	Email	Email re: Proposed Plan for Settlement Agreement	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
30	3/13/03	Steven Kopp, Dr. Shin Park, William Krummen, Richard R. Lee	Yes	Oklahoma Attorney General's Office	Report	Review and Evaluation of Sequoyah Fuels Facility Reclamation Plan	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
31	9/4/03	Steven Kopp, Richard R. Lee, Richard H. Ketelle	Yes	Oklahoma Attorney General's Office	Report	Review and Evaluation of Sequoyah Fuels Facility Groundwater Monitoring Plan and Corrective Action Plan Report	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
32	7/8/04	Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
33		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Review of Groundwater Issues in Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
34	4/22/03	Dave Smit	No	Amil Lyon	Email	Email re: Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
35	4/22/03	Dave Smit	No	Amil Lyon	Email	Email re: Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
36	4/15/03	Kelly Burch	Yes	Dave Smit, Amil Lyon	Draft and Email	Proposed Settlement Agreement Between Oklahoma and Sequoyah Fuels Corporation	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
37	3/25/03	Martha Penisten	Yes	Amil Lyon, Scott Thompson	Email	Email re: Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

38	3/31/03	Martha Penisten	Yes	Kelly Burch, Afsaneh Jabbar, Don Maisch, Carl Parrott, Mary Calvey, Mike Broderick	Email	Email re: Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
39	12/3/03	Kelly Burch	Yes	Dave Smit	Email	Email re: Sludge Dewatering License Amendment	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
40	12/3/03	Kelly Burch	Yes	Dave Smit	Email	Email re: Sludge Dewatering License Amendment	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
41	9/4/03	Steven H. Kopp, Richard R. Lee, Richard H. Ketelle	Yes	Oklahoma Attorney General's Office	Report	Review and Evaluation of Sequoyah Fuels Facility Groundwater Monitoring Plan and Corrective Action Plan Report	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
42		Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	No	Oklahoma Department of Environmental Quality	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
43		Oklahoma Attorney General's Office	No	Oklahoma Department of Environmental Quality	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
44	6/1/04	Kelly Burch	Yes	Oklahoma Department of Environmental Quality, Sequoyah Fuels	Memo	Settlement Negotiations	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
45		Materials and Chem Lab	No	Oklahoma Attorney General's Office	Report	Engineering report re: sequoyah fuels decommissioning	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
46	7/2/04	Mary Jane Calvey	No	John Ellis	Memo	memo re: SFC Risk Assessment and RESRAD	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
47	6/10/04	Kelly Burch	Yes	Oklahoma Department of Environmental Quality ("ODEQ")	Memo	Settlement Negotiations	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

48	11/17/03	Kelly Burch	Yes	Dave Smit, Don Maisch, Martha Penisten, Mary Jane Calvey, Mike Broderick, Afsaneh Jabbar, Amil Lyon, Carl Parrott, Mark Conley	Email	Email re: Sequoyah Fuels Corp. Commission Memo and Other	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
49		Oklahoma Attorney General's Office, Cherokee Nation	Yes	Oklahoma Department of Environmental Quality, Sequoyah Fuels	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
50		Kelly Burch	Yes	Oklahoma Department of Environmental Quality, Sequoyah Fuels, Cherokee Nation	Memo	Draft of Settlement Negotiations	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
51	6/1/04	Kelly Burch	Yes	Oklahoma Department of Environmental Quality, Sequoyah Fuels, Cherkoee Nation	Memo	Draft of Settlement Negotiations	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
52	6/10/04	Kelly Burch	Yes	Oklahoma Department of Environmental Quality	Memo	Settlement Negotiations	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
53	6/10/04	Kelly Burch	Yes	Oklahoma Department of Environmental Quality	Memo	Settlement Negotiations	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
54	7/2/04	Mary Jane Calvey	No	John Ellis	Memo	SFC Risk Assessment and RESRAD	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
55		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues/ Raffinate sludge	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
56		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
57		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

58		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
59		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
60		Mike Broderick	No	Dave Smit, Mark Canley	Email	Comments on SFC	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
61		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
62		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
63		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
64		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
65		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
66	12/24/03	Mary Jane Calvey	No	Mark Conley, Kelly Burch	Email	Email re: analysis of dewatered raffinate sludge	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
67		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

68		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
69		David E. Smit	No	Kelly Burch	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
70	2/23/04	David Smit	No	Sarah Penn	Fax	Fax cover sheet	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
71		Oklahoma Department of Environmental Quality	No	Oklahoma Attorney General's Office	Memo	Unresolved Issues re: decomissioning of Sequoyah Fuels	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
72	2/4/04	Sarah Penn	No	Martha Penisten	Email	SFC Questions	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
73	6/11/04	Trevor Hammons	Yes	Kelly Burch	Memo	Re: Questions to ask about Technical Requirements at SFC regarding Raffinate	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
74	2/17/1998	Jon L. Craig, Director of Department of Environmental Quality Water Quality Division	No	Jeannie Hale, Assistant Attorney General - Environment and Natural Resources Division	Letter (Correspondence c)	Information concerning Watts Irrigation site	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
75	4/10/1997	Jon Craig	No	Carl, ,Glen, HJ, Wayne, JJ, Craig, Cary	Memo	West Siloam Springs Line Project to tie to the Watts Lagoon	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
76	5/2/1997	Jeannie Hale, Assistant Attorney General - Environment and Natural Resources Division	Yes	Eric Mitts, General Counsel, Oklahoma Department of Commerce (cc: Ed Fite, OSRC; Jon Craig, DEQ - Water Quality; Vic Bird	Interoffice Memo	Environmental Review Requirements for Community Block Development Grant ("CDBG") Projects and West Siloam Springs' Application	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
77		Jon L. Craig, Director of Department of Environmental Quality Water Quality Division	No	Jeannie Hale, Assistant Attorney General - Environment and Natural Resources Division	Fax	West Siloam Springs environmental assessments	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

78	10/24/2005	Glen Jones	No	Edward Dihrberg; Karl Heinzig; Don Maisch; Kendra Foyil	Email Correspondence	RE: Facilities in Jeopardy-Worleys	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
79	11/10/2004	Kendra Foyil	No	Karl Heinzig (cc: Afsaneh Jabbar)	Email Correspondence	pmt tracking - worley's gravel	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
80	11/30/1998	Kendra Foyil	No	Quang Pham; Glen Jones; Craig Kennamer; Micahel Moe; Jon Craig; Christy Day; Norma Aldridge; Wayne Craney; Paula Albers; Don Maisch; Sam Carter; Duke Newin; Ron McClary (cc: Donald Mooney; Brad Livesay)	Email Correspondence	Re: Worley (facility permits)	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
81	2/27/2002	Paula Childers		Karl Heinzig	Email Correspondence	Worley's Gravel	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
82	9/24/2001	Paula Albers	No	WQD, Fileroom	Email Correspondence	FWD of emails between Afsaneh Jabbar and Paula Albers RE: Worley's Gravel permitting procedures	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
83	1/14/1999	Kendra Foyil	No	Carl Parrott; Donald Mooney; Craig Kennamer; Quang Pham; Michael Moe; Ali Taremi; Christy Day; Glen Jones; Jon Craig; Wayne Craney; Mark Derichsweiler	Email Correspondence	Re: Worley's Gravel (permits and possible violations)	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
84	1/13/1999	Donald Mooney	No	Kendra Foyil	Email Correspondence	Re: Worley's Gravel (modifying permit)	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

85	1/13/1999	Quang Pham	No	Kendra Foyil; Michael Moe; Glen Jones; Donald Mooney; Ali Taremi; Craig Kennamer; Christy Day; Jon Craig; Carl Parrott; Wayne Craney	Email Correspondence	re: Worley's Gravel (permit)	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
86	1/11/1999	Quang Pham	No	Glen Jones; Ali Taremi; Kendra Foyil (cc: Mark Derichsweiler; Michael Moe)	Email Correspondence	re: Jock Worley	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
87	11/13/1999	Quang Pham	No	Kendra Foyil; Michael Moe; Glen Jones; Donald Mooney; Ali Taremi; Craig Kennamer; Christy Day; Jon Craig; Carl Parrott; Wayne Craney	Email Correspondence	Re: Worley's Gravel (modifying permit)	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
88	11/30/98	Quang Pham	No	Michael Moe; Kendra Foyil (cc: Paula Albers; Carl Parrott)	Email Correspondence	Re: Jock Worley/Baron Fork	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
89	12/11/1995	Wayne Craney	No	Jon Craig (BCC: Mary Arnold; cc: Norma Aldridge)	Email Correspondence	Jock Worley (OKR 2005635)	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
90	12/11/1995	Wayne Craney	No	Jon Craig (BCC: Mary Arnold; cc: Norma Aldridge)	Email Correspondence	Jock Worley (OKR 2005635)	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
91	11/21/1995	Wayne Craney	No	Jon Craig (BCC: Mary Arnold; cc: Norma Aldridge)	Email Correspondence	Jock Worley (OKR 2005635)	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
92	11/9/1995	Jeannie Hale	Yes	James Hann	Corespondence	Re: Mining Activities in Scenic Rivers and Outstanding Resource Waters - Request for Notrice of Permit Applciations and Actions	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

93	12/16/1998	Kendra Foyil	No	OAG, ODEQ	Site Visit Report	Site Visit of Worley's Gravel, WD-95-015, I-01000110 on Baron Fork Creek	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
94	11/21/1995	Wayne Craney	No	Jon Craig (BCC: Mary Arnold; cc: Norma Aldridge)	Email Correspondence	Jock Worley (OKR 2005635)	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
95	12/16/1998	Kendra Foyil	No	OAG, ODEQ	Site Visit Report	Site Visit of Worley's Gravel, WD-95-015, I-01000110 on Baron Fork Creek	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
96	12/23/1999	Kelly Hunter Burch	Yes	Doug Schooley	Corespondence	Re: Application of Jock Worley: Non-Coal Mining Permit No. 1759	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
97	12/22/1999	Kendra Foyil	No	Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	Comments	Comments Relating to Proposed ODOM Permit for Worley's Gravel	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
98	5/19/98	Quang Pham	no	Wanda Clough, Don Maisch, David Hardgrave	e-mail	Email correspondence regarding meeting with the City of Westville	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
99	5/18/98	Wanda Clough; Donald Maisch; Quang Pham	Yes	Don Maisch, David Hardgrave, Quang Pham; Lloyd Cole; Clyde Ballard	e-mail; letters	Email correspondence regarding Westville meeting; letters regarding permit renewal	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
100	3/10/98	Quang Pham	No	Don Maisch, Craig Kennamer, Glen Jones, Jon Craig, Wanda Clough, David Hardgrave, Paula Albers, Paul Yue, Carl Parrott	e-mail	Email correspondence regarding Westville contesting permit limits	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
101	8/10/98	Christy Hughes	No	Kelly Hunter	Fax cover sheet	Fax cover sheet re: Project No. 6758	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
102	3/13/98	Wayne Craney	No	Kelly Hunter	Fax and confirmation	Fax re: letter to Jock Worley	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

103	12/13/95	Jeannine Hale	Yes	Wayne Craney	Fax	Fax re: Worley discussion	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
104	3/31/95	Jeannine Hale	Yes	Wayne Craney	Fax	Fax re: Worley correspondence	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
105	11/5/96	Jeannine Hale	Yes	Jon Dyer, Jon Craig	Fax	Fax re: DEQ letter	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
106	11/1/96	Jeannine Hale	Yes	John Dyer	Fax	Fax re: Bryan 401 certification	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
107	8/15/2005	Don Barrett	No	Don Maisch; Carl Parrott; Wayne Craney; Steven Gunnels; Glen Jones; David Pruitt; Robert Singletary; Matt Caves; Mark Hildebrand	Email Correspondence	Bids for removal of Adair Co. Dam on Barren Fork	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
108	8/15/2005	Elena Jigoulina	No	Don Barrett	Email Correspondence	Bids for removal of Adair Co. Dam on Barren Fork	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
109	8/15/2005	Don Barrett	No	Don Maisch, Carl Parrot, Wayne Crady, Steve Gunnals, Glen Jones, Rob Singletary, Matt Caves, Mark Walorgrand	Email Correspondence	Bids for removal of Adair Co. Dam on Barren Fork	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
110	1/10/2006	J.D. Strong	No	Jon Craig	Email Correspondence	Re: Removal of Dam on Barron Fork (confidential)	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
111	1/26/2006	J.D. Strong	No	Kelly Burch; Trevor Hammons (cc: Jon Craig; Miles Tolbert)	Email Correspondence	re: Baron Fork Dam (confidential)	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
112	9/30/2006	Ron Suttles	no	Glen Jones (cc: Jennifer Trotter; J.D. Strong)	Correspondence	Re: Baron Fork Low Water Dam	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

113	9/30/2006	Ron Suttles (duplicate)	No	Glen Jones (cc: Jennifer Trotter; J.D. Strong)	Correspondence	Re: Baron Fork Low Water Dam	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
114	2/17/1998	Jon L. Craig, Director of Department of Environmental Quality Water Quality Division	No	Jeannie Hale, Assistant Attorney General - Environment and Natural Resources Division	Letter (Correspondence c)	Information concerning Watts Irrigation site	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
115	4/10/1997	Jon	No	Carl, ,Glen, HJ, Wayne, JJ, Craig, Cary	Memo	West Siloam Springs Line Project to tie to the Watts Lagoon	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
116	5/2/1997	Jeannie Hale, Assistant Attorney General - Environment and Natural Resources Division	Yes	Eric Mitts, General Counsel, Oklahoma Department of Commerce (cc: Ed Fite, OSRC; Jon Craig, DEQ - Water Quality; Vic Bird	Interoffice Memo	Environmental Review Requirements for Community Block Development Grant ("CDBG") Projects and West Siloam Springs' Application	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
117		Jon L. Craig, Director of Department of Environmental Quality Water Quality Division	No	Jeannie Hale, Assistant Attorney General - Environment and Natural Resources Division	Fax	West Siloam Springs environmental assessments	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
118	7-22-2004	Donald D. Maisch	Yes	James Barwick; Douglas A. Boyd; Carl Parrott; Wayne Craney; Bob Giger; Steve Gunnels;Ed Fite	Letter	OSRC Hoby Ferrell/Greater Tulsa Investments construction on IR without permit	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
119	7-22-2004	Donald D. Maisch	Yes	James Barwick; Douglas A. Boyd; Carl Parrott; Wayne Craney; Bob Giger; Steve Gunnels;Ed Fite	Copy of Letter	OSRC Hoby Ferrell/Greater Tulsa Investments construction on IR without permit	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
120	7-22-2004	Donald D. Maisch	Yes	James Barwick; Douglas A. Boyd; Carl Parrott; Wayne Craney; Bob Giger; Steve Gunnels;Ed Fite	Copy of Letter	OSRC Hoby Ferrell/Greater Tulsa Investments construction on IR without permit	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
121	3-19-1996	Pdobie@aol.com	yes	John Perryman, 75561, 176	Email	Levi Mt. water; email from atty. Advising on new water operator and easements for water lines	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

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122	7-18-2001	Kay Coffeey	no	Don Maisch, atty., Mike S. Harrell, Carl Parrott	Memorandum	Country Place Estates (Prentiss Shelley Addition); memo to atty regarding info for hearing	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
123	1-30-1998	Larry Gregory, P.E.	No	Carl Parrott, Deborah Wilson, Kelly Hunter, atty.	Memorandum	B&E Resort (Don Eck), Bernice, OK	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
124	6-15-00	unknown	unknown	Glen Jones, Carl Parrott, Craig Kennamer	Email	Chuck Shipley and Stormwater	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
125	9-26-1996	Oklahoma Department of Environmental Quality	no	Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	Draft report	Second Interim Report Honey Creek-Cave Springs Branch Area Well Sampling	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
126		unknown	no	Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	Draft report	Hydrological Draft Report re: Simmons Foods	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
127	12-2-1999	Oklahoma Department of Environmental Quality	unknown	Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	Notes	Responsiveness of Proposed Simmons Foods Permit to Oklahoma's 12-2-99 Comments	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
128	12-16-1999	Janet Stewart	Yes	Miles Tolbert, Jon Craig, Mike Thralls	Letter	Meeting Cancellation	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
129	12-3-99	Jon Craig	no	Glen Jones, Carl Parrott, Craig Kennamer, HJ Thung, Wayne Craney, Sam Carter, Danny Hodges, Don Maisch	Email	Simmons DAF Skimmings as a fertilizer	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
130	6-16-1999	Oklahoma Department of Environmental Quality	unknown	Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	Settlement Summary	Simmons Settlement June 16, 1999	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
131		Oklahoma Department of Environmental Quality	unknown	Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	Notes	Settlement Notes	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

132	4-30-1998	Brian Griffin, J. Ross Kirtley, Mark S. Coleman, Greg Duffy	no	Drew Edmondson	Letter	Potential Settlement	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
133	6-16-1999	Oklahoma Department of Environmental Quality	unknown	Department of Environmental Quality, Oklahoma Attorney General's Office	Settlement Summary	Simmons Settlement June 16, 1999	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
134	6-8-1999	Jon Craig	no	Glen Jones, Jon Craig	email	Simmons Proceeds	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
135	6-4-1998	Glen Jones	no	Jeannine Hale	Memorandum	DEQ Costs of Sampling Cave Springs	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
136	5-14-1998	J.D. Strong	no	Jeannine Hale, Jon Craig	email	Simmons	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
137	5-26-1999	Jon Craig	no	Kelly Hunter Burch	Memorandum	Simmons Permit Conditions	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
138		Oklahoma Department of Environmental Quality	unknown	Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	Schedule	Simmons Performance Schedule	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
139	9-17-1998	Miles Tolbert	yes	Michael Moe	Email	Simmons settlement	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
140	7-19-1998	Michael Moe	no	Miles Tolbert	Letter	Simmons Foods permit	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
141	7-13-1998	Jeannine Hale	yes	Brian Griffin, Drew Edmondson, Mark Coleman, Duane Smith, Greg Duffy, Mike Thralls	Letter	Simmons Foods	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

142	7-10-1998	Jon Craig	no	Kelly Hunter, Duane Smith, Brian Griffin	Memorandum	Classification of Cave Springs Branch	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
143	6-1-1998	Jon Craig	no	Kelly Hunter, Jeannine Hale, J.D. Strong, Duane Smith	Memorandum	Recommended Discharge Limits for Simmons	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
144	4-30-1998	Brian Griffin, J. Ross Kirtley, Mark S. Coleman, Greg Duffy	no	Drew Edmondson	Letter	Request for Settlement	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
145	3-23-1998	Oklahoma Secretary of the Environment	no	W.A. Drew Edmondson	Draft Letter	Proposed Enforcement Action Simmons	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
146	3-12-1998	Mark S. Coleman	no	W.A. Drew Edmondson	Letter	Proposed Enforcement Action Simmons	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
147	3-13-1998	Jeannine Hale	yes	Brian Griffin, Mark Coleman, Duane Smith, Greg Duffy	Letter	Simmons Discharge to Cave Springs Branch, Delaware County	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
148		unknown	unknown	Mark Coleman, Glen Jones, Michael F. Dean, Carl Parrott, Judy Duncan, Wayne Craney, Norma Aldridge, Quang Pham, Mike Harrell, Sam Carter, Michael Houts, Craig Kennamer, Jimmy Pigg	Email	Cave Springs/Honey Creek	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
149	6-16-1999	Oklahoma Department of Environmental Quality	unknown	Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	Settlement Summary	Simmons Settlement June 16, 1999 and February 3, 1999	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
150	6-16-1999	Oklahoma Department of Environmental Quality	unknown	Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	Settlement Summary	Simmons Settlement June 16, 1999	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege

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151	6-16-1999	Oklahoma Department of Environmental Quality	unknown	Oklahoma Attorney General's Office, Oklahoma Department of Environmental Quality	Settlement Summary	Simmons Settlement June 16, 1999	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
152	2/27/2004	Glen W. Jones	No	Susan Krug	Technical Review	Engineering Report, Simmons Foods	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
153	7/3/1997	Jeannine Hale	Yes	Derek Smithee (cc: Jon Craig)	Fax	Simmons Permit	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
154	8/27/1997	Bob Kellogg	Yes	Jon Craig	Memo forwarding correspondence	Proposed Agreement with Simmons	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
155	5/27/87	Ron Jarman/ Jerry Barnett	Yes	Ron Jarman/Lynn Moss	note; memo; order	Sequoyah Fuels Enforcement;Sequoyah Fuels V. OWRB	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
154	7/14/95	Don Maisch	Yes	Bob Bates	Resolution memo	Investigation of septic system	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege
155	11/18/82	Landon L. Westbrook	Yes	Mike Battles	Office Correspondence	Advice of Counsel	attorney work product Fed. R. Civ. P. 26(b)(3)&(4) and attorney client privilege