IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his capacity as ATTORNEY GENERAL OF THE STATE OF OKLAHOMA and OKLAHOMA SECRETARY OF THE ENVIRONMENT C. MILES TOLBERT, in his capacity as the TRUSTEE FOR NATURAL RESOURCES FOR THE STATE OF OKLAHOMA,	)	
Plaintiff,	)	
vs.	)	4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al,	)	
Defendants.	)	

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VOLUME I OF THE VIDEOTAPED 30(b)(6) DEPOSITION OF TEENA GUNTER, produced as a witness on behalf of the Defendants in the above styled and numbered cause, taken on the 27th day of August, 2008, in the City of Oklahoma City, County of Oklahoma, State of Oklahoma, before me, Lisa A. Steinmeyer, a Certified Shorthand Reporter, duly certified under and by virtue of the laws of the State of Oklahoma.

TEENA GUNTER

having first been duly sworn to testify the truth, the whole truth and nothing but the truth, testified as follows:

DIRECT EXAMINATION

BY MR. HIXON:

Q Can you state your name for the Record, please?

A It's Teena Gale Gunter.

Q And, Miss Gunter, what's your current position? 09:20AM

A I'm a deputy general counsel at the Oklahoma Department of Agriculture, Food & Forestry.

Q How long have you been in that position?

A In that position, approximately probably four years. 09:20AM

Q Okay, and prior to that position, what position did you hold?

A I was a staff attorney with the Oklahoma Department of Agriculture, Food & Forestry in the agricultural environmental management services division. 09:21AM

Q Okay, and how long did you hold that position?

A I don't remember exactly when I switched to that position. I held another position before that, 09:21AM

litter application rates for use in the TMDL?
A Assumptions?
Q Or data.
A We provided our litter applicator reports that we had at that time. 11:39AM
Q Okay. What information would be contained in the litter applicator reports?
A Each applicator provides a report annually that contains where they got the litter from and where they spread it, soil test analysis, poultry 11:39AM litter analysis, other details of the specific application event.
Q And do you know when that information was provided to DEQ?
A I don't recall. 11:39AM
Q When was the litter or -- yeah, the Litter Applicator Act enacted?
A July 1st, 1997.
Q So it would have been at least since July 1st, 1997 that that information was provided to DEQ? 11:40AM
A Would have been after that.
Q Okay. Do you know if that was just a one-time production to DEQ or whether that's been an ongoing process?
A I know I was involved in it one time. 11:40AM