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

STATE OF OKLAHOMA, et al.,

Plaintiff,

vs. CASE NO. 05-CV-00329-GKF SAJ

TYSON FOODS, INC., et al.,
Defendants.

VIDEOTAPED DEPOSITION OF ALAN FORD
TAKEN ON BEHALF OF THE DEFENDANTS
ON JUNE 30, 2008, BEGINNING AT 9:00 A.M.
IN OKLAHOMA CITY, OKLAHOMA

REPORTED BY: Laura L. Robertson, CSR, RPR

Exhibit 1

1 MR. BONDS: Why don't we take a break.
2 (Short break)
3 Q. (BY MR. BONDS) All right. How about we
4 flip to, and I think this is Exhibit 5 of the OSRC
5 documents. Flip to OSRC0026475. Do you see that
6 document?
7 A. Yes, sir, I do.
8 Q. Okay. Do you -- are you familiar with the
9 property that that document relates to?
10 A. Yes, sir, I am.
11 Q. Okay. What document is that?
12 A. What document is that?
13 Q. Sorry, what property is that?
14 A. Well, I believe this is the Scenic Rivers
15 Commission Headquarters.
16 Q. Okay. Do you know how many acres are
17 encompassed in the property that you referred to as
18 the Oklahoma Scenic Rivers Commission Headquarters?
19 A. The legal description tells me it is .72
20 acres.
21 Q. Okay. Following this page, there is --
22 there appears to be another warranty deed, a Release
23 of Mortgage, a Power of Attorney, some Exhibit A
24 related to the Power of Attorney, another warranty
25 deed and another Release of Mortgage, and that runs

from OSRC-26475 through 82.

If you could take a look through that series of documents and let me know whether or not you think they are related to the same property?

A. They appear to be, yes.

Q. Okay. They are all related to the Scenic Rivers Commission Headquarters Complex?

A. It appears to be, yes.

Q. Okay. What is this property used for?

A. The administrative functions of the Oklahoma Scenic Rivers Commission take place in the building that sits on this property.

Q. Okay. Do you know how many buildings are on this property?

A. I do not know how many buildings are on that property.

Q. Okay. Do you know what else -- do you know of anything other than the actual commissions building where the offices are in, do you know any other structures on that property?

A. I do not know of any other structures on that property right off the top of my head.

Q. Do you know what they keep at that property as far as chemicals?

A. I did talk to Ed Fite about that property.

Q. Okay. Tell me what you and Ed talked about with respect to the Scenic River Commission Headquarters.

A. He told me -- I asked what kind of waste facilities do you have, and he said that that building is served by a septic tank with a lateral field.

Q. Okay. Do you know the size of the septic tank?

A. He thought it was around a thousand gallons, and that's pretty standard.

Q. Do you know the age of the septic tank?

A. No, sir.

Q. Did you ask?

A. I don't specifically remember on that piece of property whether I asked.

Q. What about the condition of that septic tank on the property, do you know what the condition of the septic tank is on that property?

A. Functioning.

Q. Has it had any issues?

A. No notices of violation, so it is a working septic tank system.

Q. What about anything other than a notice of violation?

A. Not to my knowledge, I do not know of