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RE: *State of Oklahoma, et. al. v. Tyson, et. al.*
Civil Action Number: 05-CV-0329-GKF-SAJ

Dear Counsel:

Pursuant to the parties' agreement during the March 26, 2008 hearing, this letter contains the State's list of experts who will be providing Rule 26 disclosures on May 15, 2008, and sets forth their areas of expertise and a general description of the area in which we anticipate their testifying. In light of the fact that their reports are not complete, there may well be other areas in which they give opinion testimony. In addition to the areas of expertise stated below, your attention is also called to the deposition and hearing testimony of the witnesses who testified at the preliminary injunction hearing. Those witnesses' previous testimony in this case provides quite a bit of information regarding some of their areas of expertise.

The State reserves its right to supplement this list and its right to add expert witnesses and / or areas of expertise / areas of testimony, as may become necessary. The State reserves its rights to otherwise amend this list as the Court may allow.

State of Oklahoma's List of Expert Witnesses Who Will Provide Rule 26 Disclosures

Darren Brown - geology, environmental sampling

Dr. Lowell Caneday - leisure studies, recreation in the IRW

Dr. Dennis Cooke - biology, limnology, aquatic ecology, ecological impacts of pollution, source identification

Dr. Bernard Engel - agricultural and biological engineering, source identification and water quality modeling

Dr. Berton Fisher - earth sciences, geology of IRW, source identification

Dr. Valerie Harwood - microbiology, source identification, risks to human health

Dr. Gordon Johnson - agronomy, nutrient management

Todd King - environmental and chemical engineering, remedial alternatives

Dr. Robert Lawrence - public health, health risks associated with industrial agriculture

Dr. Jim Loftis - agricultural engineering, civil and environmental engineering, environmental statistics

Dr. Roger Olsen - geochemistry, source identification, environmental sampling, and remedial alternatives

Megan Smith - agricultural engineering (assisting Dr. Engel)

Dr. Jan Stephenson - biology and river ecology, source identification, ecological impacts of pollution

Dr. Robert Taylor - agricultural economics, structure of the poultry industry, costs of waste management

Dr. Christopher Teaf - toxicology, human health risk assessment, source identification

Dr. Eugene Welch - fisheries, limnology, biology, aquatic ecology, ecological impacts of pollution, source identification

Dr. Scott Wells - civil and environmental engineering, water quality modeling

Dr. Berry Winn - physician, causes, treatment, and effects of human injuries

The second list in this letter is provided at this time as a courtesy. It contains the names of people, though not retained or specially employed by the State to provide expert testimony in this case, who may offer opinions based upon scientific, technical, or other specialized knowledge, skill, experience, training or education. The State employees who are listed below are not employees whose duties regularly involve giving expert testimony. Pursuant to Rule 26, the State will not be providing Rule 26 expert disclosures for these witnesses.

The State reserves its right to supplement this list and its right to add witnesses as provided by the Federal Rules.

State of Oklahoma's List of Non-Retained Witnesses
Who May Offer Opinion Testimony

| Witness Name | Expertise | Office/Agency |
|---|---|---|
| William Andrews | Water Quality; Water Quality Monitoring and Analysis; Hydrology | U.S. Geological Survey |
| Shannon Phillips | Nonpoint Source Pollution; Water Quality; Current and Historical Illinois River Watershed Pollution; Effects of Remedies and Programs on Water Quality | Oklahoma Conservation Commission |
| Paul Koenig | Water Quality Monitoring; Reporting; Planning; Water Quality; Limnology | Oklahoma Water Resources Board |
| Dan Storm | Water Quality Modeling; Pollutant Loading; Water Quality; Nonpoint Source Pollution and Control Measures | Oklahoma State University |
| Mark Derichsweiler | ODEQ Water Quality Programs and Permits; Water Quality Modeling; TMDLs; Impairment Determination and Listing; Water Quality Standards | Oklahoma Department of Environmental Quality |
| Bob Bednar | ODEQ Water Quality Programs and Permits; Water Quality Modeling; TMDLs; Water Quality | Oklahoma Department of Environmental Quality |
| Robert Lynch | Water Quality; Human and Ecological Risk Assessment; Biological Monitoring; Pollution Management Strategies; Nutrient Management | University of Oklahoma |
| Mark Meo | Pollution Management Strategies; Environmental Policy Analysis; Corporate Environmental Management | University of Oklahoma |
| Baxter Vieux | Spatial Analysis; GIS; Environmental Process and Water Quality Modeling; | University of Oklahoma |
| Monty Porter | Water Quality Monitoring, | Oklahoma Water |

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| | Data Analysis, Reporting and Planning | Resources Board |
| Tony Clyde | Lake Tenkiller Water Quality Monitoring and Data Analysis | U.S. Army Corps of Engineers |
| Bob Blaz | Water Quality Monitoring and Analysis | U.S. Geological Survey |
| Mike Smolen | Water Quality; Agricultural Practices; Environmental Management; Pollution Sources | Oklahoma State University |
| Barry Bolton | Fisheries; Biology | Oklahoma Department of Wildlife Conservation |
| Bill Fisher | Fisheries; Aquatic Ecology | Oklahoma State University |
| Noel Osborn | Groundwater; Hydrology | Oklahoma Water Resources Board |
| Derek Smithee | Water Quality Monitoring and Analysis; Water Quality Standards | Oklahoma Water Resources Board |
| Dr. Becky Brewer | Veterinarian | Oklahoma Department of Agriculture, Food and Forestry |
| Robert L. Tortorelli | Water Quality Monitoring and Analysis; Hydrology | U.S. Geological Survey |
| Thomas Soerens | Nonpoint Source Pollution; Water Quality; Environmental Engineering; Monitoring; Groundwater; Hydrology | Arkansas Water Resource Center |
| Dr. Van Brahana | Water Quality; Nonpoint Source Pollution; Hydrogeology | Arkansas Water Resource Center |
| Marc Nelson | Water Quality Monitoring and Analysis; Nonpoint Source Pollution; Hydrology | Arkansas Water Resource Center |
| H.L. Goodwin | Agribusiness; Economic and Business related to Food and Poultry Industry; Poultry Waste Management; Animal Waste Systems | University of Arkansas |
| Indrajeet Chaubey | Ecological Engineering; Nonpoint Source Pollution; Water Quality; Modeling; GIS and Remote Sensing | Purdue University |
| Tommy C. Daniel | Nonpoint Source Pollution; Nutrient Management | University of Arkansas |
| Brian Haggard | Water Quality Monitoring | University of Arkansas |

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|---|---|---|
| | and Analysis; Hydrology | |
| Andrew Sharpley | Waste Management; Water Quality; Phosphorus Application | University of Arkansas |
| John Everett | Poultry Waste Management | Master's Office, City of Tulsa v. Tyson, et al. |
| Dr. Michael Crutcher | Public Health; Epidemiology | Oklahoma State Department of Health |
| Kristie Bradley | Public Health; Epidemiology | Oklahoma State Department of Health |
| Hailin Zhang | Agronomy; Water Quality; Waste Management; Nutrient Issues; Land Application Standards | Oklahoma State University |
| Bob Westerman | Soils; Nutrients; Agronomy; Land Application Standards | Oklahoma State University |
| David Gade | Water Quality; Modeling; Nutrients | |

Sincerely,

Louis W. Bullock