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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

	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

	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