(REVISED) ENCLOSURE B: QUESTIONS

1. Please identify those individuals who assisted in the preparation of this information response. For each individual, provide the following: name, current or last known address and telephone number, dates of employment, and current and former job titles.

RESPONSE:

Chevron objects to this question as overly broad and burdensome. Chevron further objects to this question to the extent that it seeks information that is not relevant to the Requests. Without waiving these objections, Chevron responds as follows:

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2. Identify all properties owned, leased, possessed or held by you to conduct operations for the production of uranium in the Navajo Nation. Provide a copy of the lease, permit, claim(s), deed, license or any other document evidencing your status as an owner, tenant or possessor of the property and all attachments.

RESPONSE:

Chevron objects to this Request as overly broad, burdensome, and beyond the scope of CERCLA §104(e). Without waiving these objections, Chevron responds that information responsive to this Request may be found in the enclosed documents (Bates Numbers CVX0001 – CVX3385).

3. Provide information about each property identified by you, including but not limited to the following:

a. Property boundaries, including a written legal description;

b. A map identifying the property location within or in relation to the Navajo Nation;
c. Location and description of surface structures (e.g., protore, waste pile, retention ponds, buildings, housing, etc.)
d. Location and description of any ground water wells or sources of surface water used in mine operations;
e. All maps, drawings, aerial photographs of the property.

RESPONSE:

Chevron objects to this Request as overly broad, burdensome, and beyond the scope of CERCLA §104(e). Without waiving these objections, Chevron responds that information responsive to this Request may be found in the enclosed documents (Bates Numbers CVX0001 – CVX0000).

4. For each property identified by you, describe the activities or operations which were conducted by you on that property. Provide any and all documentation in your possession which describes the operations which occurred at that property.

RESPONSE:

Chevron objects to this Request as overly broad, burdensome, and beyond the scope of CERCLA §104(e). Without waiving these objections, Chevron responds that information responsive to this Request may be found in the enclosed documents (Bates Numbers CVX0001 – CVX3385).

5. For any property identified by you, describe what waste by-product(s) was produced during your operations.

RESPONSE:

Chevron responds that information responsive to this Request may be found in the enclosed documents (Bates Numbers CVX0001 – CVX0000).

6. For each waste by-product identified by you, describe what you did with these waste by-products.

a. Specifically also describe what you did with:
i) uranium protore or uneconomic material
ii) any listed or unlisted hazardous substances
iii) dewatering or surface water discharge

b. Provide all documentation which describes how waste by-product was stored, treated, disposed or deposited at the property.
c. For each waste by-product identified, provide a map identifying where on the property these wastes were stored, treated, disposed or deposited.

RESPONSE:

Chevron represents that a diligent review has been conducted of available information, and no information has been located that is responsive to this request.

7. For each property, identify and describe all reclamation or cleanup efforts made by you to address waste by-products and/or to prevent potential releases of hazardous substances.

RESPONSE:

Please see Response to Question No. 6 above.

8. Specifically, identify and describe any and all operations you conducted at the mine sites listed below. For each of these mines, answer questions 2-7 above as it applies to the site.

Mine	Aliases
NE Church Rock	
Billy the Kid	Section 19; Maddox and Teague; Prewitt, Greer, Warren and McCormack, Red Top No 1, 307; Prewitt
Kermac Mine No. 22	Section 22;
Mariano Lake	Gulf; Section 12
NE Church Rock No. 1	Section 35 Mine; Kerr McGee Quivira
Church Rock	
Charles Keith	Olijeto Mesa West; Keith Mine-A; Olijeto
CD and S	Section35
Rock Door No. 1	Rock Door Mine
Black jack No. 1	
Haystack	DOE lease NM-1-B; MLB-NM-B-1; Section 12 NM-B-1 lease, Railroad section, Arthur Bibo; Section 13 Pit
Glover	
Monument No. 2	Chee Nez No. 1; VCA Mining Unit No. 66
Mac No. 1	
NE Church Rock No1-East	Churchrock 1 East; Kerr McGee Section 36 Mine
Section 18 and Section 18 SEQ	Brown Vanderer; Williams; Williams and Thompson
Haystack No. 1	Haystack; haystack-Section 19 Open Pit Complex
Moonlight Mine	
Mesa I, Mine No. 10-15	Mesa I Mine 10-15, Mesa 1 Mine #10-15

RESPONSE:

Chevron responds that information responsive to this Request may be found in the enclosed documents (Bates Numbers CVX0001 – CVX3385).

9. For each of the mine sites identified in the table above, identify any other person(s) or entity (ies) which operated at the mine. Provide the dates of their operations and describe their operations.

RESPONSE:

Chevron objects to this question as overly broad and burdensome. Without waiving this objections, Chevron represents that a diligent review has been conducted of available information, and no information has been located that is responsive to this request.

10. If you have any reason to believe that there may be persons able to provide a more detailed or complete response to any part of this information request or who may be able to provide additional responsive documents, please identify such persons, including their last known addresses and telephone number.

RESPONSE:

Chevron is not aware of any such persons at this time.