To: Larry Silver[lsilver@lssh-law.com]
From: Fajardo, Juan
Sent: Fri 9/9/2016 5:20:10 PM
Subject: RE: Diamond Alkali Site -Settlement Confidential

Meeting changed to 1940

From: Larry Silver [mailto:lsilver@lssh-law.com]
Sent: Thursday, September 08, 2016 9:33 PM
To: Fajardo, Juan <Fajardo.Juan@epa.gov>
Cc: Diamond, Lawrence W. <LWDiamond@duanemorris.com>; 'Frank_Parigi@oxy.com' <Frank_Parigi@oxy.com>
Subject: Diamond Alkali Site -Settlement Confidential

For Settlement Purposes Only

FRE 408 - Offer to Compromise

Confidential

Juan,

Here is our proposed Agenda for tomorrow's meeting at Region 2 at 2 pm

1. Bankruptcy Issues – Proofs of Claim (EPA's and Oxy's)

2. Outstanding AOC Issues

    a. Takeover Penalty

b. Federal PRP Carve-out

c. Sharing of Settlement Proceeds

d. Financial Assurance

e. Performance Standards/Dispute Resolution

3. Issues with Handoff of Passaic and other Site information from Maxus/Tierra to Oxy

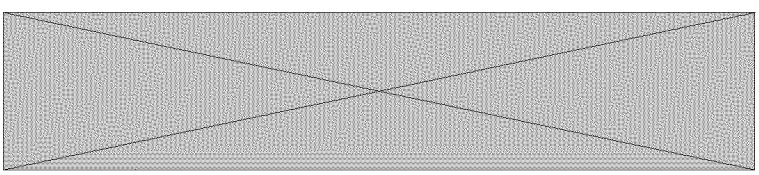
Looking forward to seeing you tomorrow and the opportunity to meet the other Region 2 people on the Passaic Site.

Regards,

Larry

Larry Silver
lsilver@lssh-law.com

Direct: 215.239.9023



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