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November 26, 2014

Via Email and First Class Mail

Benjamin Conlon, Esq.
Office of Counsel
New York State Department of
Environmental Conservation
625 Broadway
Albany, NY 12233

Dear Ben:

We are in receipt of Robert Schick's letter of November 21, 2014, and are contacting you as directed. As you know, Northrop Grumman has performed certain tasks that are enumerated in the OU2 ROD, and has also cooperated with the Navy in implementation of that ROD. We, in the immediate future, will meet with the Navy to cooperate in its implementation of the directive set forth in the Schick letter of November 5, 2014 to the Navy. We will also meet with you to discuss Northrop Grumman's entry into an appropriate order.

We look forward to discussing this matter with you and your colleague, Rosalie Rusinko, Esq. However, there is one other issue that deserves immediate attention and clarification, which is Mr. Schick's statement "given Northrop Grumman's refusal to negotiate to this point..." That statement is incorrect; Northrop Grumman has never refused to negotiate with the DEC and, in fact, has had prior discussions with the Department. As noted above, Northrop Grumman is prepared to resume those discussions. Accordingly, it would be appreciated if you would advise your client that the record in this regard should be corrected.

Please let us know about your availability for a meeting.

Sincerely,

Daniel Riesel (by MAC)

Daniel Riesel

Cc: Robert W. Schick, P.E.
Lora Fly, US Navy
Aaron Gershonowitz, Forchelli Law
George Pavlou, EPA
Walter Mugdan, EPA
John LaPadula, EPA
Doug Garbarini, EPA

Steven Karpinski, DOH
Charlotte Bethoney, DOH
Michael Ryan, DEC
Jim Harrington, DEC
John Swartwout, DEC
Steve Scharf, DEC
Rosalie K. Rusinko, DEC
(all via email)