Message

From: Daniel Fischer [Daniel@kohorstlaw.com]
Sent: 4/15/2020 6:18:44 PM
To: KCM.LAATeam2@stinson.com; Chiccine, Catherine [chiccine.catherine@epa.gov]
CC: Andy Sondag [a_sondag@yahoo.com]
Subject: Re: Citizens Gas and Electric
Attachments: 20200407 LtrToEPA Sondag.pdf

Cathie and Brittany,

I am the attorney for T & A Real Estate, LLC. We are in receipt of the letter dated March 26, 2020 regarding the Citizens Gas & Electric Company Superfund Site in Council Bluffs, Iowa and classification of T & A Real Estate, LLC as a potentially responsible party.

We believe that T & A Real Estate, LLC is entitled to numerous defenses to liability, including status as an innocent landowner and limited ability to pay.

Notwishstanding those defenses, we are willing to participate in negotiations and cooperate with the group's efforts and discussions. If there is anything we can do to assist, please let me know.

We've also mailed the attached letter to Mary Peterson.

Thanks,

Daniel P. Fischer
Kohorst & Fischer Law Firm, PLLC
602 Market Street, Suite 101
Harlan, IA 51537
Phone (712) 755-3156 / Fax (712) 755-7404
daniel@kohorstlaw.com

From: Andy Sondag <a_sondag@yahoo.com>
Sent: Wednesday, April 15, 2020 12:56 PM
To: Daniel Fischer <Daniel@kohorstlaw.com>
Subject: Fwd: Citizens Gas and Electric

Sent from my iPhone

Begin forwarded message:

> **From:** Sondag Law <sondaglaw@pas1.omhcoxmail.com>
> **Date:** April 15, 2020 at 10:31:54 AM CDT
> **To:** andy sondag <a_sondag@yahoo.com>
> **Subject: Fw: Citizens Gas and Electric**
>
> Andy -

See below email just received from EPA.

I emailed you 3-27-20 and 4-1-20 about this matter. Trusting you have contacted an attorney and you should promptly forward this email to that counsel so he/she can respond.

Thanks and advise back if questions.

- PAS

From: Chiccine, Catherine
Sent: Wednesday, April 15, 2020 9:38 AM
To: sondaglaw@pas1.omhcoxmail.com
Subject: Citizens Gas and Electric

Mr. Sondag,

I hope you are staying healthy and safe. I just wanted to touch base with you regarding the Citizens Gas and Electric letter I sent you. Is T&A Real Estate going to participate in the negotiation? Please let me know at your earliest convenience. You may want to contact Brittany Barrientos, Black Hills' attorney, regarding coordination of response and redlines to the draft ASAOC EPA sent. Her contact information is:

Brittany A. Barrientos
Partner

STINSON LLP
1201 Walnut Street, Suite 2900
Kansas City, MO 64106-2150
Direct: 816.691.2358 \ Bio

Assistant: KCM.LAATeam2@stinson.com \ 816.691.2761

Cathie Chiccine | Attorney-Advisor
United States Environmental Protection Agency, Region 7
913.551.7917 | 11201 Renner Boulevard, Lenexa, Kansas 66219
chiccine.catherine@epa.gov