Smith, Donald-M

From: Gavin H. Guillot <gavin.guillot@pjgglaw.com>
Sent: Thursday, February 08, 2018 9:49 AM
To: Smith, Donald-M
Cc: Elizabeth McIntosh
Subject: FW: Observer Questions Regardin Clovelly OIl Lake Pontchartrain Fire
Attachments: Observer Questions.docx

Categories: FOIA

Dear Mr. Smith:

We are attorneys who represent Select Oilfield Services, LLC, in connection with an explosion that occurred on a Clovelly Oil Co. platform in Lake Pontchartrain, LA, on October 15, 2017. Greg Labeth, who is one of Select's owners, forwarded to us your January 26, 2017 correspondence with the attached Observer Questions. Select is very willing to cooperate in any investigation, as it has been cooperating with OSHA since the incident occurred and has already responded to an OSHA subpoena, but we would appreciate the opportunity to speak with you first regarding the EPA's questions to Select and the EPA's involvement. To this end, I left you a voicemail yesterday.

You offered in your January 26 email to contact you if Select needs more time to respond, so without waiving any of Select's rights, we request on its behalf additional time to respond. The original deadline you proposed is Friday, February 9, so for the sake of clarity, please let us agree that this deadline will be extended to Friday, February 23, with the intention that you and I speak no later than next week.

We trust the foregoing is acceptable to you. If it is not, please be so kind as to let us know so we may discuss further.

Sincerely,

Gavin Guillot

Gavin H. Guillot
Member
PUSATERI, JOHNSTON, GUILLOT & GREENBAUM, LLC

PJGG
ATTORNEYS AT LAW

Direct: (504) 620-2010
Main: (504) 620-2500
Mobile: (504) 615-9366
Fax: (504) 620-2510
1100 Poydras St., Ste. 2250
New Orleans, LA 70163
www.pbgglaw.com

Confidentiality Notice: The information contained in this email and any attachments may be legally privileged and include confidential information intended only for the recipient(s) identified above. If you are not an intended recipient, you are hereby notified that any dissemination, distribution, or copying of this email or its attachments is strictly prohibited. If you have received this email in error, please notify the sender by return email and permanently delete the email and any attachments immediately. Please do not retain, copy, or use this email or any attachments for any purpose, nor disclose all or any part of its contents to any other person. Pusateri, Johnston, Guillot & Greenbaum, LLC operates as a limited liability company.

From: "Smith, Donald-M" <Smith.Donald-M@epa.gov>
Date: January 26, 2018 at 2:29:23 PM CST
To: "glabeth@selectoilfieldservices.com" <glabeth@selectoilfieldservices.com>
Subject: Observer Questions Regardin Clovelly OIl Lake Pontchartrain Fire

Mr. Labeth,

Clovellly Oil identified three of your employees, Al Kimbrel, Brent Neil and Cody Bodreaux, as being present at the time of the incident on October 15.

Please review the following questions with your employees and provide your best answers by email by the close of business on Friday, February 9, 2018.

Please contact me if you have questions or need more time.

Thank you for your assistance.

Donald M. Smith
6EN-AS
U.S. Environmental Protection Agency Region 6
214-665-7270

This email may contain material that is confidential, privileged and/or attorney work product and is for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.