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April 10, 2015

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VIA CERTIFIED MAIL AND EMAIL

Kathleen H. Johnson
Director, Enforcement Division
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Re: Sixth Response of Halliburton Energy Services Inc. to the January 27, 2015 Request for Information Pursuant to Section 114 of the Clean Air Act Regarding Compliance with California Air Resource Board's Truck and Bus Regulation

Dear Ms. Johnson:

Attached to this letter is the sixth response of Halliburton Energy Services Inc. ("Halliburton") to the above-referenced request.

Pursuant to the schedule agreed to on February 13, 2015, Halliburton provided an initial response to Questions 1-6 on February 18, 2015. A second response regarding Halliburton's compliance with the Truck and Bus Regulation phase-in schedule was provided on February 27, 2015. A third response addressing Question 8, regarding trucks hired or dispatched by Halliburton, was provided on March 6, 2015. This response supplements the March 6 attachment. Halliburton will continue supplementing its response to Question 8 on a weekly basis until all information has been collected for each previously-identified vendor.

Halliburton is continuing to search its files and the files of its vendors for responsive information and will supplement its response should additional information be provided. If you have any questions about this cover letter or the enclosed attachment, please contact me at scott.janoe@bakerbotts.com or 713.229.1553.

Very truly yours,

Scott Janoe

cc: Janice Chan, ENF-2-1, U.S. EPA Region 9

SIXTH RESPONSE OF HALLIBURTON ENERGY SERVICES INC. TO JANUARY 27, 2015 REQUEST

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8. *For each company identified by Halliburton in Request 12.a of the Response Letter, provide the following information:*

   a) *The name of the hired company; and*
   b) *Number of trucks hired for each job/contract or for each CY 2012, 2013, and 2014.*

Halliburton objects to this request as it asks for information that is not required by the Truck and Bus Regulation. The Truck and Bus Regulation does not require Halliburton to keep records for all trucks it hires or dispatches, only those vehicles that are subject to the regulation. Accordingly, Halliburton has interpreted this request to provide the number of vehicles subject to the Truck and Bus Regulation that were hired or dispatched for each job/contract or for each calendar year 2012, 2013, and 2014.

As stated in Halliburton's November 7, 2014 response, the list of vendors provided in response to the June 16, 2014 request consisted of vendors used by Halliburton's Bakersfield terminal during the applicable period for a variety of trucking, towing and rental services which may have involved the hiring or dispatching of a diesel-fueled vehicle with a GVWR greater than 26,000 and an engine model year prior to 2007.

Though Halliburton keeps records of all its vendor interactions, including jobs and contracts that involve vendor-provided vehicles, these records are not in a form that is readily searchable for the purposes of responding to Question 8. Halliburton has reached out to the vendors identified in Halliburton's November 7 response, requesting additional information about regulated vehicles provided by each vendor for each job or contract for each calendar year from 2012 to 2014. By using the information provided by these vendors as a cross-reference, Halliburton will be able to more fully and accurately respond to Question 8.

Halliburton has received responses from the following vendors and can provide the following information regarding the number of regulated vehicles hired or dispatched for 2012, 2013, and 2014:

[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]

[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]
[redacted]	[redacted]

Halliburton will continue to supplement its response on a weekly basis until it has information for each previously-identified vendor.