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September 1, 2017

Via Email Only

Sarah Hulstein
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street
Denver, CO 80202-1129
Hulstein.Sarah@epa.gov

Re: Request for Additional Information - Superfund Cooperative Agreement V 96803401

We represent the City/County Board of Health for Lincoln County ("Board"). We are in receipt of James A. Hageman's August 10, 2017 letter to the Board requesting additional information regarding Superfund Cooperative Agreement V 96803401. Pursuant to that letter, please find the following attached documents:

1. Invoices received from Doney Crowley P.C.;
2. July 5, 2017 Letter from R. Allan Payne to (b) (6), (b) (7)(C) and
3. Doney Crowley P.C. Draft Statement ("Draft Statement").

The Board reviewed the Draft Statement purely for attorney-client privilege purposes and not to substantiate the time allegedly spent, activities allegedly performed, or appropriateness of activities described therein. We believe the attorneys and staff who recorded time contained in that Draft Statement should be able to substantiate the time spent, activities performed, and appropriateness of activities described therein.

Please note that in providing the enclosed documents to you, the Board is waiving its attorney client privilege to those documents for the limited purpose and scope of responding to EPA's request for information in conjunction with its evaluation of this matter. The Board's is not waiving its attorney client privilege to those documents for any other purpose.

Also, we understand that since sending the August 10, 2017 letter, James A. Hageman and Paul Felz have spoken with Lincoln County Administrator Darren Coldwell regarding EPA's request for bank statements. We understand that EPA is no longer requesting those bank statements. If our understanding in that regard is not correct, please let us know.

Should you have any questions or need any further information, please feel free to contact me.

Sincerely,

MOORE, COCKRELL,
GOICOECHEA & JOHNSON, P.C.

Jinnifer Mariman

JJM/lw

Cc: Mike Cole, Chair, Lincoln County Board of Commissioners
Jan Ivers, Chair, City/County Board of Health for Lincoln County
James A. Hageman, Director of Grants, Audit and Procurement Office, U.S. Environmental Protection Agency