

DECLARATION OF SHERRY MORRIS

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL VALLEY REGION**

—
CLEANUP AND ABATEMENT ORDER NO. R5-2014-XXXX

**ATLANTIC RICHFIELD COMPANY
UNITED STATES DEPARTMENT OF AGRICULTURE,
UNITED STATES FOREST SERVICE**

**WALKER MINE TAILINGS
PLUMAS COUNTY**

—
**CLEANUP AND ABATEMENT ORDER NO. R5-2014-YYYY
ATLANTIC RICHFIELD COMPANY**

**WALKER MINE
PLUMAS COUNTY**

I, Sherry Morris, declare as follows:

1. I am a Senior Paralegal for BP America Inc. ("BP") working in the Health, Safety, Security & Environment function. I have worked in this position since May 2009. I regularly work with inside and outside counsel for BP and its affiliated companies on litigation matters. My responsibilities often require me to assemble collections of documents related to historical operations by entities in which BP's current or former affiliates held investments.
2. I located a memorandum (the "Memorandum") in Atlantic Richfield's files dated July 2000 describing a collection and review of International Smelting & Refining Co. and Anaconda Copper Mining Company documents related to the Walker Mine.
3. The Memorandum is an attorney-client communication and attorney work product. I state here the portions of the memorandum relevant to explaining how the records were collected. By stating these facts here, BP does not waive the privileged and work product protections that protect the Memorandum.
4. The Memorandum states that, in the months prior to July 2000, Atlantic Richfield paralegals worked at the direction of counsel for Atlantic Richfield to locate and assemble records related to multiple locations where former affiliates of Atlantic Richfield, and companies in which those affiliates had invested, conducted operations. This document collection and review effort was known as the Mines 2000 project.
5. According to the Memorandum's description of the Mines 2000 project, Walker Mine was one of the locations for which the paralegals involved in the project sought to locate documents.
6. The Memorandum describes several internal document archives and storage locations which were searched in an effort to locate documents related to the locations identified in the Memorandum. Boxes or databases of documents identified as potentially responsive were then reviewed individually.
7. The Memorandum states that, when documents were identified that related to any of the locations for which the search was conducted, the documents were labeled with a unique number preceded by the prefix "MIN."
8. The Memorandum further states that, at the conclusion of the Mines 2000 project, Atlantic Richfield provided Davis Graham & Stubbs LLP with copies of all documents related to Walker Mine.

//

//

//

9. The Atlantic Richfield paralegals who supervised the Mines 2000 project no longer work with either Atlantic Richfield or BP.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 20th day of February, 2014 at Houston, Texas.



Sherry Morris