

IN THE COURT OF COMMON PLEAS
OF WASHINGTON COUNTY, PENNSYLVANIA

BYRAN LATKANICH,
RYAN LATKANICH, a minor by and
through natural guardian BRYAN
LATKANICH,

Plaintiffs,

v.

CHEVRON CORP., CHEVRON
U.S.A. INC., CHEVRON
APPALACHIA, LLC, EQT CORP.,
EQT PRODUCTION COMPANY,
EQT CHAP LLC, and JOHN DOE
DEFENDANTS,

Defendants.

Certification of Compliance Regarding
Confidential Information

I certify that this filing complies with the
Provisions of the *Public Access Policy of the
Unified Judicial System of Pennsylvania: Case
Records of the Appellate and Trial Courts*
that require filing confidential information and
Documents differently than non-confidential
Information and documents



Lisa Johnson, Esquire

CIVIL DIVISION
Case No. 2022-6006

Plaintiffs' Memorandum of Law
in Support of its Response in
Opposition to Chevron's
Motion for Protective Order

Filed on Behalf of Plaintiffs
Bryan Latkanich and Ryan Latkanich
a minor by and through natural guardian
Bryan Latkanich

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FILED

JAN 22 2024

L. H. HOUGH
PROTHONOTARY

a protective order with respect to seven witnesses, including the four who purportedly do not work for Chevron.

In support of its Motion Chevron asserts: (1) it produced supplemental discovery responses; (2) it produced Kari Endries to testify as a corporate representative on designated topics; (3) that Plaintiffs "refused to stipulate to facts for which there is no contrary evidence"; (4) that the testimony of corporate executives (Mike Wirth, Hew Pate and Mary Francis) is not necessary to establish disputed facts because a corporate designee has been deposed and is available to testify; and (5) persons who are not employed by the Corporation are not subject to a notice to attend the hearing and are not necessary to any disputed fact at issue.

Plaintiffs request the Court deny Chevron's Motion because it grossly misstates the state of discovery and the evidence, lacks legal and factual support, and Chevron fails to demonstrate it has standing to seek a protective order as to persons it admits are not employed by Chevron.

A. Background

Plaintiffs have been trying to obtain relevant jurisdictional discovery from Chevron for over six months but have consistently been met with a refusal to produce information directly relevant to the issue of personal jurisdiction. On October 11, 2023, the Court issued a Discovery Order, which among other things, compelled Chevron to provide supplemental discovery responses, including: (1) answers to

interrogatories substituting the term “Agent” for “Chevron Person”; (2) information regarding work related visits of its agents to locations in Pennsylvania; (3) whether it or its agents have engaged in any of the activities described in 42 Pa.C.S.A. § 5322(a)(1)-(10); and (4) produce one or more corporate designees for deposition by Plaintiffs.

While Chevron claims to have complied with the Court’s Discovery Order, that is far from true, which is largely why Plaintiffs seek to call the subject witnesses at the hearing on personal jurisdiction. For example, while Chevron served supplemental written discovery responses on November 13, 2023, Chevron has not responded to Plaintiffs’ discovery requests with respect to Agents as required under the Discovery Order. Discovery Order, ¶¶ 5-6.

Further, while Chevron produced Kari Endries as a Rule 4007.1(e) corporate designee for the deposition on December 6, 2023, her testimony made clear that she was unprepared and/or unfamiliar with the majority of the topics identified in Plaintiffs’ Notice of Deposition. For example, Ms. Endries testified that: she did not know of any shared services between Chevron and Chevron Appalachia; and did not know details of the Lanco incident or Chevron’s involvement in the same. See Exhibit A (transcript of Ms. Endries’ deposition), Tr: 62:11-16; 63:21-64:6, 96:5-98:3. Throughout the deposition, Chevron’s counsel made numerous and excessive speaking objections, which violate Local Rule 4007.1(e)(3).

Chevron has also withheld relevant documents, which should have been produced prior to the deposition of Chevron’s corporate designee. On December 7, 2023, the day after Ms. Endries’ deposition, Plaintiffs received a document production – *which included relevant and material jurisdictional documents* - from Defendant EQT CHAP in the administrative action before the Pennsylvania Environmental Hearing Board (“Emails”). Bryan Latkanich v. DEP et al., 2023 EHB 043 (“EHB Action”). Notably, EQT CHAP is represented in the EHB action and this action by the same counsel as Chevron, however, Chevron did not produce these documents as part of jurisdictional discovery. *See Exhibit B* (copies of Emails). The Emails are relevant to the issue of jurisdiction because they detail the actions of Chevron employees in coordinating with consultants *in Pennsylvania* regarding the facts at issue in this very case.

In the Emails, Joseph Miller and Veronica Flores-Paniagua, among many others, identified themselves as working for “Chevron Corporation” despite Chevron’s claims that they are not employees. Plaintiffs were deprived of the opportunity to question the corporate designee or any other witness about the Emails.

Finally, in its Motion, Chevron alleged to the Court that Plaintiffs refused to stipulate to any of Chevron’s proposed facts. However, on January 5, 2024, Plaintiffs’ counsel sent counsel for Chevron an email stating that Plaintiffs would stipulate to multiple of Chevron’s proposed facts. *See Exhibit C*. Although Chevron

unfairly impugns Plaintiffs and their counsel in its moving papers, Chevron either failed to review or chose to disregard its own records when it made this demonstrably false accusation. It is worth noting that it is Chevron that refused to stipulate to any of Plaintiffs' proposed facts. *See Exhibit D* ("Facts").

II. STATEMENT OF ISSUE

A. Scope of Evidentiary Hearing

Plaintiffs have the burden of proof to establish this Court is entitled to find exercise personal jurisdiction over Chevron, under the Pennsylvania Long-Arm Statute, 42 Pa.C.S. § 5322. In meeting its burden, and consistent with the Discovery Order, Plaintiffs have identified several witnesses that have *personal and unique knowledge* of facts directly relevant to Chevron's minimum contacts with Pennsylvania, and which were not and cannot be addressed solely by Ms. Endries.

B. Chevron Bears The Burden Of Proof For A Protective Order

In moving for a protective order to preclude Plaintiffs from calling the subject witnesses, **Chevron bears the burden of proving it is entitled to a protective order**. Importantly, Chevron's Motion fails to set forth any factual or legal support that justifies a protective order in the present case.

First, Chevron asserts Plaintiffs should be precluded from calling the subject witnesses simply because Plaintiff took the deposition of Chevron's corporate representative. Plaintiffs have articulated how Ms. Endries' testimony as the

corporate designee was incomplete and insufficient. Consequently, the mere fact that Plaintiffs deposed a corporate representative does not support a protective order.

Moreover, pursuant to Rule of Civil Procedure 4012, the standard for Chevron to obtain a protective order requires a sufficient showing that an order is required to protect a person from “unreasonable annoyance, embarrassment, oppression, burden, or expense.” Chevron has not established that any of these factors apply under the present circumstances.

Instead, Chevron relies heavily on federal caselaw throughout its Motion. Absent a United States Supreme Court pronouncement, the decisions of federal courts are not binding on Pennsylvania state courts, even when a federal question is involved. Werner v. Plater-Zyberk, 799 A.2d 776, 782 (Pa. Super. 2002). Therefore, the Court is not required to find the authority cited by Chevron supports the requested relief. Chevron’s reliance on “*In re Risperdol Litigation*”, No. 130401990 (Philadelphia Cnty., Sept. 10, 2019) is likewise misplaced. The dispute in *Risperdol* concerned whether the plaintiffs could call an executive *at trial*. In other words, the dispute in that case arose after discovery had concluded and is irrelevant to the circumstances now before the Court.

It would be highly prejudicial to deprive Plaintiffs of a full and fair opportunity to address the issue of personal jurisdiction by shielding individuals that

have unique and firsthand jurisdictional knowledge without any legal or factual support.

III. ARGUMENT

A. The Corporate Witnesses Have Personal Knowledge Of Facts Directly Relevant To The Issue of Personal Jurisdiction

Plaintiffs seek to call three corporate executives – Mike Wirth, Hew Pate and Mary Francis – who were all *identified by the corporate designee* as being individuals who visited Pennsylvania in their corporate capacity and have personal knowledge about minimum contacts with Pennsylvania. Thus, contrary to Chevron’s conclusory assertions, such testimony is not “an attempt to harass Chevron Corporation’s executive officers.” While Chevron asserts that Ms. Endries’ testimony is sufficient, Plaintiff disagrees and the Court should not permit Chevron to control Plaintiffs’ presentation of evidence on the important issue of personal jurisdiction.

1. Mike Wirth

Ms. Endries confirmed that Chevron employees and the Board of Directors made trips to Pennsylvania since 2011 to view Chevron’s “investments.” She also specifically testified that on September 29 and 30, 2015, Chevron CEO Mike Wirth, General Counsel Hew Pate, and Corporate Secretary Mary Francis all attended a trip to Pennsylvania. Tr. 80:18-82:23. Ms. Endries notably did not attend the trip and

Chevron has identified no other employees or Agents who traveled to Pennsylvania during the relevant time period.

As a direct participant in visits to Pennsylvania, Mr. Wirth possesses unique knowledge about those visits (and possibly other visits that Ms. Endries is unaware of) and Chevron's "investments" and operations in Pennsylvania. Ms. Endries, who lacks firsthand knowledge of these visits and who has never been to Southwestern Pennsylvania, could not and cannot testify as to any details about the frequency, purpose, agenda, or locations of the visits, underscoring the necessity of Mr. Wirth's testimony at a hearing. Mr. Wirth has the information that the corporate designee lacks; accordingly, it is not unreasonable to hold that he should be required to testify.

In December 2019, Mr. Wirth appeared on a CNBC talk show, "Squawk Box," to explain Chevron's massive write-down of the company's Appalachian assets, which include assets in Pennsylvania. *See Exhibit E*. If Mr. Wirth can appear on a talk show to discuss Chevron's Pennsylvania "investments," he should be compelled to do so in a Pennsylvania court.

Plaintiffs' questioning of Mr. Wirth at the hearing is intended to generally be limited to Mr. Wirth's visits to Pennsylvania, the number of such visits, the purpose of such visits, other persons who were present, the sites that were discussed, the sites that were visited, whether the instant matter was addressed during those trips, the Agents that Chevron uses for matters related to or affecting Pennsylvania, Chevron's

purchase and sale of investments in Pennsylvania, the capitalization of Chevron U.S.A. Inc. and Chevron Appalachia, and the Lanco Incident (as defined in the Complaint).

2. Mary Francis

Similar to Mr. Wirth, Ms. Francis was also identified as being present at the meetings in September 2015. Facts at ¶ 30. In addition, Chevron acted as a guarantor to Defendant Chevron U.S.A., Inc. (a Pennsylvania corporation) in the issuance of over \$5 billion in debt securities during the relevant timeframe. Tr. 68:23-70:1; Tr. 84:5-85:21; Tr. 139:12-140:11. Ms. Endries testified that Ms. Francis was an officer of both Chevron and Chevron U.S.A, at the time Chevron filed Form S-3, Registration Statement with the SEC and in connection with the guaranty, but Ms. Endries testified she did not know the details of Ms. Francis's dual role. Tr. 84:24-85:21. Thus, Ms. Francis has personal knowledge of not only the board trip to Pennsylvania, but also facts and issues relating to Chevron's guaranty provided on behalf of Defendant Chevron U.S.A., Inc.

Plaintiffs likewise intend to limit their questions of Ms. Francis relative to visits made to Pennsylvania, the guaranty, and the power of attorney, and the practice of sharing officers between Chevron and its subsidiaries.

3. Hew Pate

Mr. Pate was identified as one of three people on the 2015 trip to Pennsylvania and has direct knowledge of the same. See Facts ¶ 30. Nevertheless, given that Mr. Pate's testimony may be duplicative of Mr. Wirth's and/or Ms. Francis's, Plaintiffs are withdrawing their request to have Mr. Pate testify.

Based on the foregoing, Plaintiffs have a good faith basis for calling these corporate witnesses considering the corporate designee's admitted lack of knowledge regarding the about the relevant details known by Mr. Wirth and Ms. Francis. Chevron's corporate designee – and the counsel who prepared her – knew that trips to Pennsylvania and issues relating to the \$5 billion in debt securities were going to be asked about during the deposition but chose to or failed to become sufficiently familiar with the facts. Chevron should not be permitted to use the corporate designee's lack of due diligence as a shield to block a full development of the record. Therefore, the Court should deny Chevron's Motion with respect to these witnesses.

B. Chevron Lacks Standing To Move For A Protective Order Regarding Witnesses It Claims It Does Not Employ

Chevron's Motion assert "Alan Rosenthal, Joseph Miller, and Veronica Flores are not employees of Chevron Corporation and therefore Chevron cannot be required to produce them to attend the hearing." Chevron's own admissions establish that it lacks standing to bring a protective order to preclude witnesses that are not employed

by it at the hearing. Furthermore, the fact that a person is not employed by Chevron does not unilaterally preclude them from being called as a witness at the hearing. Here, Chevron U.S.A. Inc. is a party and Plaintiffs are certainly entitled to demand that Chevron U.S.A. produce these witnesses at the hearing. In Pennsylvania, any competent witness may be compelled to testify in any matter, civil or criminal, except for defendants actually upon trial in a criminal proceeding. 42 Pa. Stat. and Cons. Stat. Ann. § 5941.

C. The Testimony Of The Additional Witnesses Is Directly Relevant To The Issue Of Personal Jurisdiction

1. Alan Rosenthal

Chevron states that Mr. Rosenthal is in-house counsel employed by Defendant Chevron U.S.A. Inc.; Chevron has not invoked the attorney-client privilege for communications between Chevron and Mr. Rosenthal. Mr. Rosenthal was present at a meeting with the Department of Environmental Protection and Plaintiff Bryan Latkanich on June 11, 2019. *See Exhibit F* (meeting sign-in sheets); *see also* Complaint at 5-6. Most recently, Mr. Rosenthal, together with an attorney from Jones Day, was present during Ms. Endries' deposition. Each claimed that he was not "representing" anyone and was only "observing" the deposition. However, Ms. Endries identified Mr. Rosenthal as the person who prepared her for the deposition. However, Plaintiffs are withdrawing their request to have Mr. Rosenthal testify at the hearing.

2. Joseph Miller and Veronica Flores

These Emails plainly indicate that Mr. Miller and Ms. Flores identified themselves as representatives of “Chevron Corporation.” See Exhibit B at 2, 6. While Chevron claims that Mr. Miller’s and Ms. Flores-Paningua self-identification as being employed by Chevron was “erroneous” this is a disputed issue of fact. Furthermore, this documentation confirms, at a minimum, that Chevron U.S.A. Inc. failed to maintain a separate corporate identity.

As an example, between June and September, 2019, there was a series of communications involving Mr. Miller, Ms. Flores-Paniagua, Mr. Oliver¹, and FTI Consulting concerning a CNBC report on Chevron and the Latkaniches. Mr. Oliver sought information about a doctor mentioned in a Pittsburgh Post-Gazette article, who diagnosed Plaintiff and minor child Ryan Latkanich with hydrocarbon and radiation exposure. With help from FTI Consulting, they debated strategies to challenge the credibility of the doctor's connections to anti-oil and gas groups and Mr. Oliver suggested preemptive measures to discredit the forthcoming news story. The dialogue also mentioned Dr. John Stolz of Duquesne University, in Pittsburgh, Pennsylvania who performed free water testing for Mr. Latkanich. Finally,

¹ Given that Chevron represents Trip Oliver no longer works with Chevron U.S.A., Chevron lacks standing to seek a protective order with respect to Mr. Oliver and therefore Plaintiffs have not addressed Mr. Oliver in this motion. Plaintiffs are still evaluating whether they will call Mr. Oliver to testify at the hearing.

conversations about using the gathered information to critique the toxicologist were exchanged between Mr. Oliver and Ms. Flores-Paniagua. *See Exhibit B* at 1; see also *Exhibit B1* (toxicology report). In addition, the Emails between certain of the proposed witnesses suggest that Chevron utilized Agents to carry out research and intelligence on journalists and doctors who Chevron identified as being involved in this matter, and who Chevron failed to disclose. *See* 42 Pa. C.S. § 5322(a)(1)(ii).

The Emails also reveal that Chevron knew the distinction between using its platform and those of its subsidiaries and Chevron likely used its platform to disseminate information intended to discredit, and perhaps intimidate, journalists and Pennsylvania doctors in matters that occurred in Pennsylvania, including in this matter. *See* 42 Pa. C.S. § 5322(a)(4).

Joseph Miller's testimony is critical due to his direct involvement in the research and investigative actions likely taken by Chevron through Agents. Mr. Miller's communications provide key insights into Chevron's strategy for addressing potential negative publicity concerning health diagnoses linked to environmental exposure allegedly caused by Chevron's operations. Mr. Miller's knowledge of the role of FTI Consulting, of the research into a physician at the University of Pittsburgh, is directly relevant to the issue of Chevron's contacts with Pennsylvania and understanding Chevron's tactics for influencing public perception and preparing for this and other disputes in Pennsylvania.

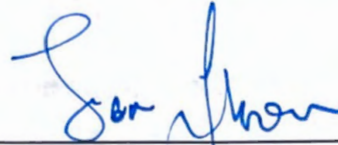
Ms. Flores-Paniagua's testimony is critical as it can provide substantial information regarding Chevron's response to allegations of environmental impact and related health in Pennsylvania. Flores-Paniagua's testimony is likely to shed light on Chevron's handling of the media narrative of persons whom Chevron perceives as adversaries in order to prepare for this and other disputes in Pennsylvania.

Based on the foregoing, the Court should find Chevron lacks standing to seek a protective order with respect to persons it asserts are not employed by Chevron. Furthermore, the Court should deny Chevron's motion on the merits because Plaintiffs have demonstrated a good faith basis for calling these witnesses to testify at the hearing on personal jurisdiction.

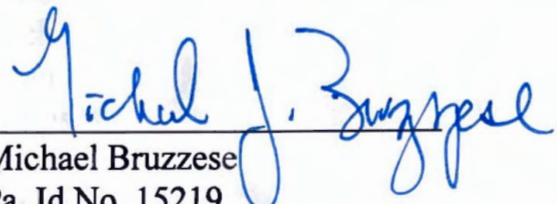
Finally, Chevron should not be permitted to continue delaying this proceeding, because among other things, Plaintiff Bryan Latkanich's health continues to worsen, and his physician has advised that Mr. Latkanich is at risk of sudden death. *See Exhibit G.*

WHEREFORE, for the reasons set forth herein and in Plaintiffs' Response, the Court should deny Chevron's Motion for a Protective Order and Ms. Kari Endries, Mr. Mike Wirth, Ms. Mary Francis, Mr. Joseph Miller, and Ms. Veronica Flores-Paniagua should be compelled to appear at a hearing as ordered by the Court.

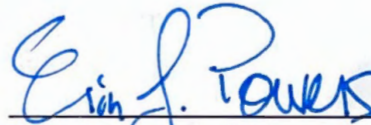
Respectfully submitted,



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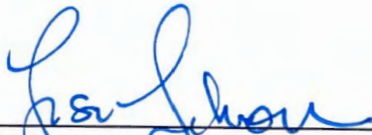
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January 22, 2024

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **Plaintiffs' Memorandum of Law in Support of its Response in Opposition to Chevrons Motion for Protective Order** were served upon the counsel via electronic mail, this 22nd day of January 2024.

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EXHIBIT A

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IN THE COURT OF COMMON PLEAS
OF WASHINGTON COUNTY

BRYAN LATKANICH, HUNTER)
LATKANICH, COLTON LATKANICH,)
and RYAN LATKANICH, a minor)
by and through natural)
guardian BRYAN LATKANICH,)

Plaintiffs,)

vs.) Case No. 2022-6006

CHEVRON CORP., CHEVRON)
U.S.A., INC., CHEVRON)
APPALACHIA, LLC, EQT CORP.,)
EQT PRODUCTION COMPANY, EQT)
PRODUCTION MARCELLUS, EQT)
CHAP LLC, and JOHN DOE)
DEFENDANTS,)

Defendants.)
_____)

VIDEOCONFERENCE DEPOSITION OF KARI ENDRIES

(In Her Capacity as Corporate
Designee of Chevron Corporation)
December 6, 2023

ATKINSON-BAKER, a Veritext Company
(800) 288-3376

Reported By: Sheila A. Detwiler, CSR No. 2847
Registered Merit Reporter
Certified Realtime Reporter

FILE NO.: 6315659

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IN THE COURT OF COMMON PLEAS
OF WASHINGTON COUNTY

BRYAN LATKANICH, HUNTER)
LATKANICH, COLTON LATKANICH,)
and RYAN LATKANICH, a minor)
by and through natural)
guardian BRYAN LATKANICH,)

Plaintiffs,)

vs.)

Case No. 2022-6006

CHEVRON CORP., CHEVRON)
U.S.A., INC., CHEVRON)
APPALACHIA, LLC, EQT CORP.,)
EQT PRODUCTION COMPANY, EQT)
PRODUCTION MARCELLUS, EQT)
CHAP LLC, and JOHN DOE)
DEFENDANTS,)

Defendants.)
_____)

Videoconference deposition of KARI ENDRIES,
in her capacity as Corporate Designee of Chevron
Corporation, taken on behalf of Plaintiffs, commencing
at 10:17 a.m., December 6, 2023, before Sheila A.
Detwiler, Certified Shorthand Reporter No. 2847, in and
for the State of California.

* * *

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Ryan Latkanich
Brian Ward, Esq.
Alan Rosenthal, Esq.
Craig Stewart, Esq.
Janet Lauff, paralegal

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I N D E X

WITNESS: Kari Endries

EXAMINATION	PAGE
By Ms. Johnson	7

E X H I B I T S

PLAINTIFFS'

NUMBER	DESCRIPTION	PAGE
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Exhibit 21	Binder received by witness from Legal Department	67

1 VIDEOCONFERENCE; WEDNESDAY, DECEMBER 6, 2023; 10:17 A.M.

2 THE VIDEOGRAPHER: Good morning. We are going
3 on the record at 10:17 a.m. on December 6th, 2023.

4 Please note that this deposition is being conducted
5 virtually. Quality of recording depends on the quality 10:17

6 of camera and internet connection of participants. What

7 is seen from the witness and heard on screen is what

8 will be recorded. Audio and video recording will

9 continue to take place unless all parties agree to go

10 off the record. 10:18

11 This is media unit 1 of the video-recorded

12 deposition of Kari Endries taken by counsel for

13 plaintiff in the matter of Ryan Latkanich, et al.,

14 versus Chevron Corp., et al., filed in the Court of

15 Common Pleas of Washington County, Case No. 2022-6006. 10:18

16 This deposition is being conducted remotely

17 using virtual technology. My name is Robert Raney

18 representing Veritext Legal Solutions, and I am the

19 videographer. The court reporter is Sheila Detwiler

20 from the firm Veritext Legal Solutions. I am not 10:18

21 authorized to administer an oath. I am not related to

22 any party in this action, nor am I financially

23 interested in the outcome.

24 If there are any objections to proceeding,

25 please state them at the time of your appearance. 10:19

1 Counsel and all present will now state their appearances
2 and affiliations for the record beginning with the
3 noticing attorney.

4 MS. JOHNSON: Lisa Johnson of Lisa Johnson &
5 Associates on behalf of the plaintiffs. 10:19

6 MR. BRUZZESE: Michael Bruzzese also on behalf
7 of the plaintiffs.

8 MS. POWERS: Erin Powers on behalf of
9 plaintiffs.

10 MS. CONDO: Kathy Condo on behalf of Chevron 10:19
11 Corporation.

12 Would you also like the two men present who are
13 not participating to identify themselves on the video?
14 They've been identified to the court reporter for the
15 record. 10:19

16 THE COURT REPORTER: I would like all present
17 to announce their name.

18 MS. CONDO: Okay. I don't know if you are
19 going to be able to hear them because they moved to the
20 other end of the table. So let them walk down to our 10:20
21 end to do that.

22 MR. ROSENBERG: This is Al Rosenthal with
23 Chevron.

24 MR. STEWART: Frank Stewart with Jones Day.

25 THE COURT REPORTER: Thank you. 10:20

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KARI ENDRIES,
having first been duly sworn, was
examined and testified as follows:

EXAMINATION

BY MS. JOHNSON:

Q Hi, Ms. Endries. I'm Lisa Johnson. I'm one of
the attorneys representing the plaintiffs in this
matter. Thank you for being here today. Are you 10:20
comfortable? Are you all settled? Some things were
moving around there. I just wanted to make sure that
you're comfortable where you are and if you needed water
or anything else before we get started.

A I'm comfortable. Thank you. 10:21

Q Okay. Great. Thanks.

So could you just please again repeat your name
for the record.

A Kari Endries.

Q And have you ever testified under oath before? 10:21

A No.

Q Have you ever given a deposition before?

A No.

Q And I'll go through some instructions to
hopefully make it more comfortable and so there's less 10:21

1 uncertainty as we proceed with the questions.

2 So you are aware that you are being deposed in
3 the case of -- and I'm going to read the whole
4 caption -- Bryan Latkanich, Hunter Latkanich, Colton
5 Latkanich, and Ryan Latkanich, a minor by and through 10:21
6 natural guardian Bryan Latkanich, plaintiffs, versus
7 Chevron Corporation, Chevron U.S.A., Inc., Chevron
8 Appalachia, LLC, EQT Corporation, EQT Production
9 Company, EQT Production Marcellus, EQT Chap, LLC, and
10 John Doe defendants. You're aware that you're being 10:22
11 deposed in this case?

12 A Yes.

13 Q So in your deposition I'm going to be asking
14 you questions, and you are going to be answering them
15 under oath. Do you understand that? 10:22

16 A Yes.

17 Q There are a few differences between a
18 deposition and a typical conversation that I think it's
19 easier to try and guide the process here today.

20 First, the court reporter is attempting to 10:22
21 transcribe everything we say. In a normal conversation,
22 people sometimes interrupt or talk over each other, but
23 here it's important that we wait for each other to
24 finish before asking or answering a question before the
25 other begins talking. Do you understand this? 10:22

1 A Yes.

2 Q Since this is an oral transcription, the court
3 reporter cannot indicate -- we are using video, but it's
4 important to not use head nods or other gestures, and
5 every answer needs to be verbal. Do you understand 10:23
6 this?

7 A Yes.

8 Q Is there any reason that would prevent or limit
9 you today from giving truthful answers to my questions?

10 A No. 10:23

11 Q There's nothing wrong with asking me to repeat
12 a question or to explain a term if you don't understand
13 my question. However, if you answer my question, I'm
14 going to assume that you understood it. Do you
15 understand this? 10:23

16 A Yes.

17 Q However, if you need clarification of my
18 question, you need to look to me for clarification and
19 not to anyone else in the room. Do you understand this?

20 A Yes. 10:23

21 Q Sometimes when I ask a question, you'll have
22 partial knowledge but not absolutely certain or complete
23 knowledge. For example, if I ask you the temperature
24 right now, you couldn't necessarily tell me the exact
25 degree, but you could give me an approximate answer. 10:24

1 And even if you couldn't, you probably know whether it's
2 hot or cold or somewhere in between. In that
3 circumstance, an answer of "I don't know" is not
4 appropriate, but an answer giving a range or estimate
5 based on your knowledge with an explanation that it's a 10:24
6 range or estimate is appropriate. Do you understand
7 this?

8 A Yes.

9 Q Sometimes I might ask you a question in which
10 you aren't sure of the answer, but you can reference 10:24
11 some document and answer the question with certainty
12 after you reference it. I can then decide whether to
13 allow you to look at the document to get an exact
14 response or not provide it and get a less exact
15 response. Do you understand this? 10:24

16 A Yes.

17 Q Finally, I'm entitled to what are considered
18 complete answers. That means an answer that fully and
19 completely answers my question. For example, if I asked
20 if you had orange juice, toast, and coffee for breakfast 10:24
21 and I asked you what you ate for breakfast, if you
22 answered orange juice, that would not be a complete
23 answer, and you would not have properly answered my
24 question. However, you are under no obligation to
25 answer that question by telling me what you had for 10:25

1 lunch even if that had already occurred. Do you
2 understand this?

3 A Yes.

4 Q And we'll start with your education. We'll
5 start with college. When and where did you go to 10:25
6 undergraduate?

7 A I graduated from the University of Southern
8 California in 1991.

9 Q And what did you major in?

10 A Journalism and English. 10:25

11 Q I'm sorry?

12 A Journalism and English. I double majored.

13 Q Thank you. And did you go to graduate school?

14 A I went to law school.

15 Q And where and when did you go to law school? 10:25

16 A I graduated from Southern Methodist University
17 in 1994.

18 Q And where did you work after law school?

19 A A lot of places. Initially -- do you want them
20 all? 10:26

21 Q Yeah. And you don't have to go into detail
22 over each one but certainly each employer, you know,
23 that you had up until present, yes, that would be great.

24 A The first job I had was at Barnes & Associates
25 in Washington, D.C. The second job I had was Reich, 10:26

1 Laufman, Riker, & McKenzie in Los Angeles. Then I went
2 to Buchalter, Niemeyer, Hatfield, & Riker. And then I
3 went to Unocal Corporation, and then after that Chevron
4 Corporation.

5 Q When did you begin employment with Chevron 10:27
6 Corporation?

7 A I joined Chevron Corporation from the Unocal
8 Corporation merger in 2005.

9 Q And what role did you have with Chevron
10 Corporation in 2005? 10:27

11 A Assistant Secretary and Managing Counsel.

12 Q And how long did you hold that position?

13 A I still hold that position.

14 Q So that has been your position the entire time?

15 A Yes. 10:28

16 Q Okay. And are you here on behalf of Chevron
17 Corporation and not as an individual?

18 A I'm here on behalf of Chevron Corporation.

19 Q And who designated you as the designee for
20 Chevron Corporation? 10:28

21 A Our legal counsel.

22 Q Your legal counsel did.

23 What conversations did you have with others
24 other than legal counsel within Chevron Corporation with
25 respect to using you as the designee for today's 10:28

1 deposition?

2 A No other conversations.

3 Q To that end, are you the person at Chevron

4 Corporation with the most knowledge of Chevron

5 Corporation's activities and minimum contacts in 10:29

6 Pennsylvania?

7 A I believe I have the most knowledge.

8 Q Are there any areas where you are not

9 knowledgeable?

10 MS. CONDO: Object to the form of the question. 10:29

11 Vague and ambiguous.

12 You may answer.

13 THE WITNESS: I would imagine there are lots of

14 areas in Chevron Corporation that I don't have

15 knowledge. 10:29

16 Q BY MS. JOHNSON: So do you understand that all

17 of the answers you will give to my questions today will

18 represent not only your personal knowledge but also

19 based upon all information known or available to Chevron

20 Corporation? 10:29

21 A Yes.

22 Q Do you agree that the answers you will give to

23 our questions will be binding upon Chevron Corporation?

24 MS. CONDO: Object to the form of the question

25 as asking for a legal conclusion. 10:30

1 Q BY MS. JOHNSON: Are you here today to give
2 answers that will be binding upon Chevron Corporation?

3 MS. CONDO: Same objection.

4 MS. JOHNSON: Are you advising her not to
5 answer? 10:30

6 MS. CONDO: No. I'm objecting that you're
7 asking her for a legal conclusion with respect to the
8 import -- or impact of testimony by a corporate
9 representative. She has already testified she's here as
10 a designee and that she's here to testify on behalf of 10:30
11 Chevron Corporation. Those are appropriate questions to
12 which she's answered.

13 The legal impact on the case with respect to
14 whether anything she testifies to today is binding on
15 the corporation is not for her to answer. It's for a 10:31
16 judge ultimately, if there were a dispute about it. We
17 don't know what questions you're going to ask her.
18 Certainly things outside the corporate Notice of
19 Deposition may not be binding on Chevron Corporation,
20 but that's not for this witness to testify to. 10:31

21 MS. JOHNSON: I just wanted to confirm for the
22 record that that's the intent of this deposition and
23 that the witness should have been explained that that's
24 the intent. If there's already an objection that
25 Chevron Corporation is going to make that her testimony 10:31

1 may not be binding, I would suggest that you get that
2 objection on the record. If not, I'm going to proceed.

3 MS. CONDO: You may proceed. That was not the
4 objection I made. Your characterization of it was not
5 my objection. But you may certainly proceed based on 10:31
6 the answers she's already given you to the questions
7 about what she's here to do and my objection on the
8 record.

9 So you may proceed with that.

10 MS. JOHNSON: Thank you. 10:32

11 Q BY MS. JOHNSON: Now, those two gentlemen at
12 the end of the table, do you know those gentlemen?

13 A I know Al.

14 Q So the two attorneys who were in the room with
15 you, do you know those gentlemen? 10:32

16 A I know one of them.

17 Q And who is that?

18 A Al Rosenthal.

19 Q And what about the attorneys from Jones Day?

20 MS. CONDO: Objection. There's only one 10:32
21 attorney here from Jones Day.

22 MS. JOHNSON: Oh, I didn't recog- -- I've seen
23 Alan. I apologize. It's been, like, a hundred years.
24 I didn't recognize you.

25 Q BY MS. JOHNSON: Do you know the other attorney 10:32

1 sitting with Mr. Rosenthal?

2 A I do not.

3 Q And did you speak to that attorney at any point
4 prior to this deposition?

5 A I introduced myself this morning. 10:32

6 Q And where was that?

7 A Outside the conference room.

8 Q And did you discuss anything other than a brief
9 introduction?

10 A No. 10:33

11 Q And what were you told as to why this attorney
12 from Jones Day was going to be present here today?

13 MS. CONDO: Objection to the form of the
14 question. To the extent that there were discussions
15 between Ms. Endries and her counsel, those are 10:33
16 privileged, and I do instruct her not to answer to the
17 extent there was any information provided to her by
18 counsel.

19 MS. JOHNSON: You had indicated at the
20 beginning that the attorney for Jones Day isn't counsel 10:33
21 in this matter. So there is no attorney-client
22 privilege between Ms. Endries and the Jones Day
23 attorney.

24 MS. CONDO: Your question wasn't whether she
25 was communicated anything by the Jones Day attorney. 10:33

1 She's already told you she didn't have any discussions
2 with him. Your question related to what she was told by
3 others. "The others" would include counsel with whom
4 she does have a privilege, and I'm objecting with
5 respect to any information provided to Ms. Endries about 10:34
6 the Jones Day lawyer or anything else by her counsel.

7 And that is privileged, and I instruct her not
8 to answer with respect to her discussions with her
9 counsel, me, or Mr. Rosenthal, in-house counsel.

10 MS. JOHNSON: So going forward, Kathy, I think 10:34
11 it makes sense that all objections except for privilege
12 objections are preserved, and ongoing objections and
13 speaking objections aren't appropriate and we can
14 reserve that for after the deposition. Agreed?

15 MS. CONDO: No. The objection I just made was 10:34
16 as to privilege -- let me finish -- all objections as to
17 privilege will be made on the record. The other
18 objections that will be made on the record relate to
19 objections as to form of the question, which are
20 absolutely appropriate and required to be made during 10:34
21 the deposition.

22 Also, I contemplate that depending on your
23 questioning, there may be objections that need to be
24 interposed now with respect to questions going beyond
25 the scope of your corporate designee notice. I don't 10:35

1 know if those objections will be required, but if so,
2 they will be made.

3 So I will make objections as needed and
4 appropriate.

5 MS. JOHNSON: Thank you. 10:35

6 Q BY MS. JOHNSON: Ms. Endries, let's go back to
7 the actual question that I was trying to ask you, and
8 then we'll move on.

9 Other than introducing yourself to the Jones
10 Day attorney, did you discuss anything else with the 10:35
11 Jones Day attorney?

12 A No.

13 Q And what were you advised as to why the Jones
14 Day attorney was there today?

15 MS. CONDO: Objection as to privilege. We've 10:35
16 already gone through this. I'm instructing her not to
17 answer with regard to any conversations she had with her
18 counsel with respect to the subject you're asking about
19 or any other subject.

20 (Plaintiffs' Exhibit 1 was marked for identification.) 10:36

21 MS. JOHNSON: So I'm going to share my screen
22 and show Exhibit 1. So can everyone see Exhibit 1?

23 MS. CONDO: We see -- not a document, but we
24 see the word "Exhibit 1."

25 MS. JOHNSON: Great. I'm going to move down. 10:36

1 Q BY MS. JOHNSON: Ms. Endries, this is the
2 Notice of Deposition. There have been several
3 iterations of the notice, given scheduling changes, but
4 have you seen -- and I'll let you look through this --
5 have you seen this Notice of Deposition before? 10:36

6 MS. CONDO: And I would just ask -- maybe you
7 can clarify which iteration this is. You sent me one a
8 day or two ago. Is it that one, or is it what I'll call
9 the original one?

10 MS. JOHNSON: It's the revised one. 10:37

11 MS. CONDO: Okay.

12 Q BY MS. JOHNSON: Ms. Endries, have you seen the
13 most recent Notice of Deposition that your counsel
14 received a day or two ago?

15 A No, I did not. 10:37

16 Q Okay.

17 MS. JOHNSON: Kathy, do you have that with you?

18 MS. CONDO: I'm looking because I have one with
19 me, but I want to make sure it's that one. Hold on.

20 Let me -- 10:37

21 MS. JOHNSON: Actually, I'll have to revise it
22 anyway. It still has Ms. Lee's name in there anyways.
23 We need to change that to "Ms. Endries."

24 MS. CONDO: Yes. I believe that I have with
25 me, the one you have as Exhibit 1. 10:37

1 MS. JOHNSON: And do you want to put that in
2 front of her, and we'll let her take a look at it for a
3 moment.

4 MS. CONDO: Sure. I have just handed it to
5 her. 10:38

6 MS. JOHNSON: And then if you could just mark
7 that, Kathy, to make sure that you get that to us -- or
8 a copy of that, that that's the one she looked at and
9 worked off of, that would be great.

10 MS. CONDO: I'm not sure why that's necessary, 10:38
11 but I'm not going to refuse to do that.

12 MS. JOHNSON: Thank you.
13 I'm going to go off camera just for a moment.

14 MS. CONDO: The witness has indicated that
15 she's looked at the notice to the extent that she could 10:40
16 do so sitting here.

17 Q BY MS. JOHNSON: Ms. Endries, about how many
18 hours do you think it took you to prepare for this
19 deposition?

20 A Possibly -- this is just an estimate -- seven. 10:40

21 Q Seven. Seven hours?

22 A I would think so.

23 Q So we're going to go through Exhibit 1. These
24 are just the definitions, and your counsel had already
25 made objections to those. So the "Subjects," here, are 10:41

1 you prepared today to give testimony about each of the
2 subject areas that appear in this "Subjects" list?

3 A Yes.

4 Q Do you have any documents to produce today in
5 connection with today's deposition? 10:41

6 MS. CONDO: And I would just indicate that
7 documents, of course, have already been produced to you
8 by counsel both in response to the interrogatories,
9 which were the same subject matter as this prior to the
10 deposition. 10:42

11 MS. JOHNSON: I wanted to check and see if
12 there were additional documents that were going to be
13 entered today by you. So no additional documents?

14 MS. CONDO: Correct. No additional documents.

15 Q BY MS. JOHNSON: Ms. Endries, what are the 10:42
16 recordkeeping practices of Chevron Corporation with
17 respect to the oil and gas operations in Pennsylvania?
18 What is the recordkeeping system at Chevron Corporation
19 that you used to prepare for today?

20 MS. CONDO: Object to the form of the question. 10:42
21 Vague. Ambiguous. Overly broad. But she may answer
22 with respect to Chevron Corporation.

23 THE WITNESS: Chevron Corporation has no oil
24 and gas business in Pennsylvania. There are no
25 recordkeeping at those. 10:43

1 Q BY MS. JOHNSON: So Chevron Corporation keeps
2 no records with respect to oil and gas operations in
3 Pennsylvania?

4 A Chevron Corporation does not have oil and gas
5 operations in Pennsylvania. 10:43

6 Q I'm not asking if they have operations in
7 Pennsylvania. I'm asking if Chevron Corporation has
8 documents in its possession about oil and gas operations
9 in Pennsylvania by it or any of its subsidiaries.

10 MS. CONDO: Object to the form of the question 10:43
11 because the question's vague and ambiguous. Are you
12 asking whether Chevron Corporation has the documents?

13 MS. JOHNSON: Kathy, I'd like you to reserve
14 these types of objections. If the witness has a
15 question, if she doesn't understand my question, she can 10:43
16 ask me. So I'm going to have to ask you to refrain from
17 making these types of objections.

18 MS. CONDO: And I will object as appropriate
19 and necessary. My objection to this question is it's
20 vague and ambiguous as you just reframed it because it's 10:44
21 not clear whether you're asking about Chevron
22 Corporation's documents or -- now you've included
23 subsidiaries in it. So my objection stands.

24 Q BY MS. JOHNSON: Ms. Endries, does Chevron
25 Corporation have any documents related to oil and gas 10:44

1 operations in Pennsylvania, period?

2 A No.

3 Q And how did you confirm that?

4 A I spoke with legal counsel. I did research on
5 Chevron Corporation's governance documents. I spoke 10:44
6 with Chevron Corporation's Treasury Department and
7 Controller's Department.

8 Q Do you believe that that was a diligent search
9 in order to prepare for this deposition? I'm sorry?

10 A Yes. 10:45

11 Q So I'm going to go -- I'll come back to
12 topic 1, but I want to move to topic 2. You're an
13 officer of both Chevron Corporation and Chevron U.S.A.;
14 is that correct?

15 A Yes. 10:45

16 Q How many other individuals are both officers of
17 both Chevron Corporation and Chevron U.S.A.? I'm sorry?

18 A Probably three or four.

19 Q So if we go to -- I believe it's exhibit -- so
20 this is exhibit -- we're going to go -- sorry to be 10:46
21 scrolling. I hate it when I have to do that, but it is
22 what it is. Okay. Exhibit 4. Go back down.

23 MS. CONDO: If you could just identify for us
24 what Exhibit 4 is in its entirety.

25 MS. JOHNSON: My computer is not cooperating. 10:47

1 One second. There we go.

2 (Plaintiffs' Exhibit 4 was marked for identification.)

3 Q BY MS. JOHNSON: Ms. Endries, I'll leave this
4 on the screen for a moment, and then I'll ask if you
5 need me to keep scrolling down through this document. 10:47

6 This is Defendant Chevron Corporation's
7 Supplemental Objections and Responses to Plaintiffs'
8 First Set of Jurisdictional Interrogatories and Request
9 for Production of Documents Directed to Chevron
10 Corporation. And this was dated November 13th of 2023. 10:48
11 Are you familiar with this document?

12 A Yes.

13 Q So if we go to --

14 THE COURT REPORTER: I'm sorry. I didn't hear
15 an answer. 10:48

16 (Plaintiffs' Exhibit 2 was marked for identification.)

17 Q BY MS. JOHNSON: -- Exhibit 2 -- so this is at
18 the end of the supplemental production that was made.
19 Do you recognize this document?

20 A Yes. 10:48

21 Q Did you prepare this document?

22 A No.

23 Q Who prepared this document?

24 A I don't know the answer to that question.

25 MS. CONDO: Lisa, just before you go further, 10:48

1 can you just tell us what portion of what you've put on
2 the screen is Exhibit 4. Is it the entirety of the
3 Supplemental Responses or just certain exhibits to it?
4 Just so we know going forward what Exhibit 4 is.

5 MS. JOHNSON: I'll send you the link to the 10:49
6 Dropbox, and you can --

7 MS. CONDO: No. We're in a conference room
8 right now. I don't have a computer in front of me. A
9 link to a Dropbox isn't going to do me any good. All
10 I'm asking is for the record right now, if you could 10:49
11 just tell us simply what Exhibit 4 includes. That's
12 all.

13 MS. JOHNSON: So Exhibit 4, as I just stated,
14 was the Supplemental Responses that Chevron Corporation
15 gave to our discovery requests. 10:49

16 MS. CONDO: Okay. I'm sorry.

17 MS. JOHNSON: Go ahead, Kathy.

18 MS. CONDO: So it's the entirety of the
19 Supplemental Responses with all exhibits to it. That's
20 all I wanted to know. Is the answer to that "yes," that 10:49
21 that's Exhibit 4?

22 MS. JOHNSON: Yes.

23 MS. CONDO: Okay. Thank you.

24 Q BY MS. JOHNSON: Ms. Endries, going back to
25 this document, so this is -- would you agree that this 10:50

1 lists the officers and directors of Chevron U.S.A.,
2 Inc.?

3 A Yes.

4 Q Do you recognize this document?

5 A Yes. 10:50

6 MS. CONDO: And for the record, could you just
7 describe -- because the record is not going to reflect
8 what you're showing her that she's saying "yes" to.

9 Q BY MS. JOHNSON: Ms. Endries, do you
10 acknowledge and agree that this is a list of officers 10:50
11 and directors for Chevron Corporation?

12 A Yes.

13 Q Did you prepare this list?

14 A No.

15 Q So going back to my question of how many other 10:50
16 individuals sit on both the Chevron U.S.A., in any
17 executive capacity -- of Chevron U.S.A. and Chevron
18 Corporation -- and correct me if I'm wrong. You said
19 three or four; is that correct?

20 MS. CONDO: I'd just object to the form of the 10:51
21 question. I think originally your question related to
22 officers. And I don't know that there's a distinction.
23 The witness could tell you if you care. But now I think
24 you're using in any executive capacity.

25 Q BY MS. JOHNSON: Ms. Endries, do you know of 10:51

1 any individuals serving in any capacity that serve in
2 those positions for both Chevron Corporation and Chevron
3 U.S.A.?

4 A Yes.

5 Q And approximately how many people share those 10:51
6 functions among those two companies?

7 A Can I open my book and look? I can't tell
8 from....

9 MS. CONDO: And for the record, the witness is
10 looking at a hard copy of the two lists that have been 10:51
11 shown to her, the list of Chevron Corporation officers
12 and directors and the list of Chevron U.S.A. officers
13 and directors.

14 THE WITNESS: I think there are five.

15 Q BY MS. JOHNSON: And who are those five? 10:53

16 A Paul Antebi, A-n-t-e-b-i. Troy Lee.

17 MS. CONDO: When you give these names, for the
18 help of the court reporter, you might spell the last
19 name.

20 THE WITNESS: L-e-e. Kari Endries. Jeff 10:53
21 Gustavson, G-u-s-t-a-v-s-o-n. And Wayne Borduin,
22 B-o-r-d-u-i-n.

23 Q BY MS. JOHNSON: Is that it, Ms. Endries?

24 A Yes.

25 Q And would you agree that M.T. Reilly is also 10:55

1 listed as an officer of Chevron U.S.A. and Chevron
2 Corporation?

3 A Oh, apologies. Yes.

4 Q And did you know whether -- did you know this
5 information and prepare to answer questions about shared 10:55
6 officers prior to this deposition?

7 MS. CONDO: You mean in preparation for the
8 deposition or before she even knew about the deposition?

9 Q BY MS. JOHNSON: Ms. Endries, what did you do
10 to prepare to talk about the organizational chart for 10:55
11 today's deposition?

12 A I didn't know the organizational chart.

13 Q And with respect to officers or directors, what
14 did you do to prepare to answer questions about the
15 officers and directors that are listed on these 10:56
16 exhibits?

17 A I reviewed these two exhibits -- or these two
18 pages.

19 Q And where did you confirm -- how did you
20 confirm that these were the current officers and 10:56
21 directors?

22 A I have access to Chevron Corporation's list of
23 officers and directors and to Chevron U.S.A., Inc.'s
24 list of officers and directors.

25 Q So did you take this list and compare it to the 10:56

1 information that you have?

2 A Yes.

3 Q So going up to the organizational chart -- I'm
4 going to let you look at this for a moment. Would you
5 agree that this represents the chain of ownership chart 10:57
6 as of November 30th of 2020?

7 A Yes.

8 Q And have there been any changes since
9 November 30th of 2020 to the organizational chart? And
10 what would those changes be? 10:57

11 A Chevron Appalachia, LLC, was sold.

12 Q Any other changes?

13 A No.

14 Q So would you agree that with the deletion of
15 Chevron Appalachia, that this, then, would be the 10:57
16 current organizational chart?

17 A Can you expand that question.

18 Q Sure. So if we deleted Chevron Appalachia from
19 this chart, would you agree that this is the current
20 ownership chart -- 10:58

21 A Except for Appalachia --

22 Q -- as of this day versus three years ago?

23 A I'm not sure I understand the question.
24 Chevron Appalachia, LLC, is not with Chevron anymore.
25 So it's not -- it would not be at the current chart 10:58

1 because Chevron Appalachia is not no longer in
2 existence.

3 Q Okay. So that would be the only change. And
4 then with that change, this is the ownership chart that
5 exists today? 10:58

6 MS. CONDO: Objection to the form of the
7 question. Vague and ambiguous. Exists today for what
8 entity?

9 MS. JOHNSON: For Chevron Corporation as it
10 leads to Chevron Northeast Upstream. 10:58

11 THE WITNESS: So this would be Chevron
12 Northeast Upstream, LLC's organizational chart after
13 Chevron Corporation.

14 Q BY MS. JOHNSON: And what about Chevron U.S.A.,
15 Inc.? Does this reflect the organizational chart for 10:59
16 Chevron U.S.A.?

17 A This reflects Chevron U.S.A., Inc.'s
18 organizational chart up to Chevron Corporation.

19 Q And are there subsidiaries of Chevron U.S.A.,
20 Inc., that are not listed on this? 10:59

21 A Yes.

22 Q And what subsidiaries are those?

23 A I did not prepare for that question. I believe
24 that question to be out of scope for this interrogatory.

25 MS. JOHNSON: Kathy, I think I'm going to ask 11:00

1 if you can concur with your client's legal conclusion.

2 MS. CONDO: Well, what I will say is that yes,
3 it is our position that Chevron U.S.A. subsidiaries that
4 have nothing to do with and didn't have anything to do
5 with Chevron Appalachia, Inc. -- I'm sorry -- Chevron 11:00
6 Appalachia, LLC, those subsidiaries are not relevant to
7 the Latkanich case or the personal jurisdictional issue.

8 So yes, we did not provide and do not believe
9 that it's within the scope to provide a list of all
10 Chevron U.S.A. subsidiaries that exist having nothing to 11:00
11 do with Chevron Appalachia, LLC's operations or
12 Pennsylvania operations.

13 MS. JOHNSON: Well, I think we should take a
14 look at the order -- the Discovery Order.

15 MS. CONDO: You are certainly free, Lisa, to 11:01
16 bring that to the Court's attention if you believe that
17 you need to do so. But you and I sitting here and
18 debating whether Chevron U.S.A.'s subsidiaries need to
19 be included on an organizational chart is not going to
20 further this deposition. 11:01

21 If you want to ask this witness questions
22 generally, if she's able to answer them about Chevron
23 U.S.A. subsidiaries, you know, you can ask those
24 questions. I'm not going to object to that. And to the
25 extent that she can provide you information about, you 11:01

1 know, generally those subsidiaries and what they did,
2 I'll let you ask those questions.

3 If you want an organizational chart for Chevron
4 U.S.A., all Chevron U.S.A. subsidiaries, that's not
5 going to occur during this deposition anyway. That's 11:02
6 going to require discussion and, if necessary, Court
7 intervention after the deposition.

8 Q BY MS. JOHNSON: Ms. Endries, with respect to
9 any other organizational charts that may be implicated,
10 say, for example, subsidiaries of Chevron U.S.A., Inc., 11:02
11 subsidiaries of Chevron U.S.A. holdings, that for the
12 record you did not prepare to answer any other questions
13 about this organizational chart?

14 A Yes.

15 Q And who did you ask about the organizational 11:02
16 chart when you were first helping to prepare these
17 responses for discovery? Who within Chevron Corporation
18 did you discuss the organizational chart with?

19 A I just looked at the database that we have at
20 my office. My team runs that database. 11:03

21 Q And did your team help you?

22 A I believe initially this was prepared by
23 someone on my team who is no longer on my team.

24 Q What is that person's name?

25 A Gina Lee. 11:03

1 MS. CONDO: You want to spell that for the
2 court reporter, the first name.

3 THE WITNESS: G-i-n-a. Last name Lee, L-e-e.

4 Q BY MS. JOHNSON: So we're going to go next
5 to -- let me make sure I have the correct document. 11:04
6 These are documents that were produced by your counsel
7 in discovery.

8 And, Kathy, it has your Bates numbers.

9 MS. CONDO: You want to describe for the record
10 those Bates numbers just so -- because the record is not 11:04
11 going to be able to see what's on the screen.

12 MS. JOHNSON: So this was produced by your
13 client in the supplemental discovery that we just looked
14 at, and they produced it. And the Bates number is
15 Chevron_Latkanich 0013481. 11:04

16 Q BY MS. JOHNSON: Do you recognize this
17 document? Ms. Endries?

18 MS. JOHNSON: Is everybody still there?

19 MR. BRUZZESE: Looks like we lost the --
20 Why don't we go off the record, please. 11:05

21 MS. JOHNSON: Yeah. Let's go off the record,
22 please.

23 MR. BRUZZESE: They may be coming back.

24 THE VIDEOGRAPHER: Going off the record. The
11:05 25 time is a.m.

11:05

25

1 (Off the record from 11:05 a.m. to 11:06 a.m.)

2 THE VIDEOGRAPHER: We are back on the record.

3 The time is 11:06 a.m.

4 MS. CONDO: So I was just saying that right
5 after Lisa identified the Bates number of the document, 11:06
6 everyone froze, and then it spontaneously came back. So
7 we're back. And to the extent anyone said anything
8 after Lisa identified the Bates number, we didn't hear
9 it.

10 MS. JOHNSON: Thank you, Kathy. 11:06

11 Q BY MS. JOHNSON: So, Ms. Endries, do you
12 recognize this document?

13 A Yes.

14 Q And what is this document?

15 A It's an Intercompany Counsel and Service 11:07
16 Agreement.

17 Q And how are you familiar with this document?

18 A I signed this document.

19 Q And what is this document -- what does this
20 agreement do? Can you describe the purpose of this 11:07
21 agreement.

22 A This is an agreement between Chevron
23 Corporation, Chevron U.S.A., Inc., and any company that
24 also signs whereby Chevron Corporation can provide
25 certain corporate functions to Chevron U.S.A., Inc., and 11:07

1 any other company that signs.

2 Q And what is the date of this agreement?

3 A January 1, 2021.

4 Q And were there prior agreements -- from 2011

5 through 2021, were there other agreements in place 11:08

6 during that time that served the same purpose?

7 A There may have been. I don't have the answer

8 to that.

9 Q So with respect to -- I believe it was

10 interrogatory -- it's topic 7. I'll go back to -- if 11:08

11 you have topic 7 in front of you, I'm going to try to

12 switch over without....

13 So topic 7 is the "Identification and nature of

14 all contracts, insurance policies, master service

15 agreements, global agreements similar to trademark, 11:09

16 logo, or websites, contracts for the provision of goods

17 or services, the transmission of oil and gas products,

18 the purchase or sale of real estate that relate to or

19 are concerned with business transacted or real estate

20 situated in and/or transiting through the Commonwealth 11:09

21 of Pennsylvania."

22 Do you understand that request?

23 A Yes.

24 Q And what did you do to respond to this request?

25 Where did you look within the corporation for documents? 11:09

1 MS. JOHNSON: I'll get to that, Kathy, thanks.

2 MS. CONDO: We need it on the record, Lisa.

3 I'm not trying to be difficult. It's just housekeeping.

4 We don't have the exhibits here with us. So as we're

5 discussing documents, the record just needs to reflect 11:11

6 what exhibit number you're going to mark Bates 13481 and

7 what exhibit number you're going to mark as 13495.

8 That's all.

9 MS. JOHNSON: Certainly. I'll do that when we

10 wrap up this line of questioning. Thank you. 11:11

11 Q BY MS. JOHNSON: So going back to this

12 document, what is this document -- can you identify what

13 this document is.

14 A This is a Counsel, Service, and Support

15 Agreement. 11:11

16 Q And what's the date of this agreement?

17 MS. CONDO: It's cut off so your screen-share

18 doesn't show the whole document. If you can move it

19 over a little. The other way.

20 MS. JOHNSON: Ms. Endries probably has this. 11:12

21 Let's give her a minute to look at it, Kathy, please.

22 MS. CONDO: Okay. Let her find it in her hard

23 copy, then, because the date is cut off on the

24 share-screen. That's all.

25 MS. JOHNSON: Well, it's defined in another 11:12

1 document.

2 MS. CONDO: I don't understand what you're
3 saying. I'm just saying, let her pull up a hard copy of
4 it here.

5 THE WITNESS: February 1, 2022. 11:12

6 Q BY MS. JOHNSON: Thank you. And you agree that
7 that's your signature to this document as well?

8 A I agree.

9 Q And who is this agreement between?

10 A The agreement is between Chevron Corporation 11:12
11 and any affiliate that signs the agreement.

12 Q And what's the difference between this
13 agreement and the agreement we just looked at?

14 A It's a very similar agreement. It provides
15 corporate services. This agreement supersedes the 11:13
16 previous agreement.

17 Q So this agreement supersedes this agreement
18 (indicating)?

19 MS. CONDO: And, again, we need for the
20 record -- we can't be saying "this agreement" and "that 11:13
21 agreement." We need to either use exhibit designations
22 or, at a minimum, Bates numbers. So if you could just
23 restate that question, saying this agreement, either
24 Exhibit 1 or Bates 13495 supersedes exhibit blank or
25 Bates Number blank. Otherwise, the record will have no 11:13

1 idea what we're talking about.

2 MS. JOHNSON: Certainly.

3 Q BY MS. JOHNSON: Ms. Endries, I've given you
4 two different Bates numbers of two different documents.

5 One begins on Bates Number 0013481, and the other one 11:14
6 begins on 0013495.

7 MS. CONDO: I'm showing her where the Bates
8 numbers are.

9 THE WITNESS: Bates Number 0013489 supersedes
10 any other agreement. 11:14

11 Q BY MS. JOHNSON: I'm sorry. That's 13481;
12 correct?

13 A It's 0013489.

14 Q That's a Bates number I don't believe I'm
15 showing here. 11:15

16 MS. CONDO: So I think -- just for
17 clarification, there are several Bates numbers at the
18 bottom. I'm not trying to be difficult. This would all
19 be a lot easier if you would just take a moment -- even
20 if we have to go off the record -- mark each of these as 11:15
21 an exhibit, and then we can clearly refer to both for
22 the record and the witness can know that one agreement
23 is Exhibit 5 -- I'm making it up -- and one's 6. So
24 let's just take a minute.

25 If you can look at the Dropbox or someone can 11:15

1 tell us what the exhibit designations are, and let's get
2 them marked.

3 MS. JOHNSON: Sure. Yeah. Your exhibits that
4 she signed, but we will certainly mark those here in
5 just a moment. 11:15

6 Q BY MS. JOHNSON: Ms. Endries, what all do you
7 have in front of you?

8 A I have Intercompany Counsel and Service
9 Agreement, Bates number 0013482, dated January 1, 2021.

10 And I have Counsel, Service -- 11:16

11 Q Let's call that the 2021 agreement. Agreed?

12 A Okay.

13 Q Okay.

14 A And then I have 0013495, which is Counsel,
15 Service, and Support Agreement. 11:16

16 Q And that was executed in 2022; correct?

17 A (No audible response).

18 Q So we'll identify this one as the 2022
19 agreement. Does that work for you, Ms. Endries?

20 A Yes. 11:16

21 Q Now, going back to -- you had testified -- and
22 correct me if I'm wrong -- that the 2022 agreement
23 superseded the 2021 agreement; is that correct? I'm
24 sorry. I couldn't hear you.

25 A Yes. 11:17

1 Q So the 2021 agreement isn't in effect right
2 now?

3 A Correct.

4 Q So what is the difference between the 2021
5 agreement and the 2022 agreement? 11:17

6 A The 2022 agreement provides additional
7 corporate services than the 2021 agreement.

8 Q Is there a separate department within Chevron
9 Corporation that deals with these global agreements? Is
10 there a separate department within Chevron Corporation 11:17
11 that manages that?

12 MS. CONDO: Object to the form of the question
13 with respect to "global agreements." But the witness
14 may answer.

15 THE WITNESS: There is no formal department 11:17
16 that contains all of the global agreements. However,
17 this agreement was done through the legal department.
18 0013506 was done through the legal department.

19 Q BY MS. JOHNSON: And so what other areas or
20 departments would there be an agreement similar to this 11:18
21 where Chevron Corporation is providing services or other
22 things for consideration?

23 MS. CONDO: Object to the form of the question.
24 Vague and ambiguous as to "other things for
25 consideration." 11:18

1 You may answer.

2 THE WITNESS: I don't believe there are any
3 other agreements.

4 Q BY MS. JOHNSON: And what did you do to confirm
5 that there were no other agreements besides these 11:18
6 agreements?

7 A I did a search on our governance database, and
8 I spoke with legal.

9 Q Are there other databases within Chevron
10 Corporation that house documents other than the 11:19
11 governance database?

12 MS. CONDO: Object to the form of the question.
13 Vague and ambiguous. Beyond the scope of the
14 deposition. But the witness may answer.

15 THE WITNESS: There are other databases within 11:19
16 Chevron Corporation that maintain Chevron Corporation
17 documents, yes.

18 Q BY MS. JOHNSON: And what are those called?

19 MS. CONDO: Object.

20 Q BY MS. JOHNSON: What are those databases 11:19
21 called?

22 MS. CONDO: Object to the form of the question.
23 Overly broad and goes beyond the scope.

24 But you may answer.

25 THE WITNESS: Every department maintains 11:19

1 documents. Every department within Chevron Corporation
2 maintains documents.

3 Q BY MS. JOHNSON: And where are all of those
4 housed? Say, for example, I'm in the EH&S Department at
5 Chevron Corporation. What database are my documents in? 11:20
6 Is that a separate EH -- I'm not done, Kathy -- is that
7 a separate EH&S database, or is that a database that is
8 shared across the company? Do you see what I'm saying?

9 MS. CONDO: Object to the form of the question.
10 Vague and ambiguous. Beyond the scope and assuming that 11:20
11 there's an EH&S database within Chevron Corporation. No
12 foundation laid by this witness or anyone else to that.

13 THE WITNESS: There is no shared database among
14 all departments of Chevron Corporation.

15 Q BY MS. JOHNSON: So is it possible that there 11:20
16 could be other agreements between Chevron Corporation
17 and its subsidiaries and affiliates to provide services,
18 supplies, products that you are not aware of? Is that
19 possible?

20 MS. CONDO: Objection to form. 11:20
21 You may answer.

22 THE WITNESS: It's possible but unlikely.
23 Every agreement would go through the legal department.

24 Q BY MS. JOHNSON: So was your search relegated
25 to the governance database and the legal department? 11:21

1 company. So it is well within the scope, and you had
2 testified, I believe, that you did approach the
3 Controller's office to see if there were any agreements
4 that were between Chevron Corporation and its
5 subsidiaries and affiliates; is that correct? Is that 11:23
6 what you testified to?

7 A That is correct. But I asked them about
8 agreements between Chevron Corporation and Chevron
9 U.S.A., Inc. I did not ask them about every document
10 that they maintain. 11:23

11 Q So there's been a lot of back and forth, if
12 you've read the pleadings and the filings about the
13 applicability of the subsidiaries to the personal
14 jurisdiction over Chevron Corporation. Are you familiar
15 with the Discovery Order -- and I forget the date -- 11:23
16 that the judge ordered with respect to the timing of
17 this deposition? Are you familiar with that order?

18 MS. CONDO: First of all, I need to put an
19 objection on the record. Object to the form of the
20 question with respect to asking this witness about the 11:24
21 back and forth and the legal proceedings that have gone
22 on. That's beyond the scope of what she's here to
23 testify about.

24 Q BY MS. JOHNSON: So, Ms. Endries, what is your
25 understanding of your testimony here today with respect 11:24

1 to the subsidiaries of Chevron Corporation?

2 A My understanding is I'm being asked to testify
3 regarding the interrogatories I've signed.

4 Q So what is your understanding with respect to
5 the applicability of subsidiaries to your testimony 11:24
6 today?

7 MS. CONDO: Object to the form of the question,
8 asking this witness for legal determinations that have
9 been made by the judge. The interrogatories which
10 follow identically along the lines of the corporate 11:24
11 Notice of Deposition set forth the objections and the
12 information that's being provided.

13 Q BY MS. JOHNSON: Ms. Endries, are you aware of
14 the distinction that is being used in this case between
15 subsidiaries and agents with respect to minimum 11:25
16 contacts?

17 MS. CONDO: Object to the form of the question.
18 The judge has ruled on that. And that goes beyond the
19 scope of this deposition, and it certainly is asking
20 this witness for some kind of -- I don't know -- summary 11:25
21 or legal conclusion regarding the proceedings that have
22 gone on and are already decided upon by the judge.

23 Q BY MS. JOHNSON: Ms. Endries, in preparation
24 for this deposition, did you review the Discovery Order
25 in preparation for testimony today? 11:25

1 A No. I reviewed interrogatories I signed.

2 Q So we're going to go to the Discovery Order
3 now. Let's see. It's probably --

4 MS. CONDO: I think you said you were going to
5 mark the two Bates-labeled documents as exhibits when 11:26
6 you completed that questioning. Are we in a place to do
7 that before we lose track of that? The records doesn't
8 have exhibits --

9 MS. JOHNSON: Thanks so much, Kathy, for
10 keeping track. Let's see here. 11:26

11 MS. CONDO: Does that mean you're not doing it?
12 I just don't understand why we're having a dispute about
13 whether we're going to mark exhibits in a deposition to
14 make the record clear. Are you refusing to do it?

15 MS. JOHNSON: No. I'm looking for something, 11:26
16 Kathy.

17 MS. CONDO: That's fine. I just didn't
18 understand Exhibit 4.

19 MS. JOHNSON: Yeah. I'm looking for something.
20 Thanks. Let's see here. Where did I put that Discovery 11:27
21 Order?

22 MS. CONDO: You know, we've been going for an
23 hour and a half. Would it make sense to take a comfort
24 break, and it would also allow you to pull those things
25 up? 11:27

1 MS. JOHNSON: No. Let's get through this line
2 of questioning because then I can mark your exhibits for
3 you. Let's see here.

4 I'll come back to the Discovery Order. I can
5 do that. But let's go back to -- let's see here. I 11:27
6 need to get my screen back. Okay.

7 Q BY MS. JOHNSON: So, Ms. Endries, what is your
8 understanding of Chevron Corporation's use of any party
9 to transact business on its behalf?

10 MS. CONDO: Object to the form of the question. 11:27
11 Vague and ambiguous.

12 If you understand it, you can answer it.

13 THE WITNESS: Chevron Corporation doesn't ask
14 any party to act on its behalf.

15 Q BY MS. JOHNSON: Okay. For example, in the 11:28
16 2022 contract -- or agreement, let's look at this
17 because that's the one that's in effect; correct? Is
18 that correct, Ms. Endries?

19 A Yes.

20 Q So, for example, in this agreement, the Scope 11:28
21 of Services, all of these services, would you please
22 identify which services are shared between Chevron
23 Corporation and Chevron U.S.A. and the affiliates who
24 signed this agreement.

25 A Treasury Services, Governance Services. I'm 11:28

1 not certain about Administrative Services.

2 Q Can you continue reading the list so it's on
3 the record.

4 MS. CONDO: Let her look at her hard copy
5 because this one's cut off on the screen. Let her pull 11:29
6 out her hard copy.

7 MS. JOHNSON: That's Bates number 13496.

8 THE WITNESS: I don't have Bates 13496.

9 MS. CONDO: Her Bates numbers on her hard copy
10 are different. And it might -- well, I'm not sure why, 11:30
11 what it relates to. Here. Let's look at -- it's
12 page -- can you scroll down so I can give her the page
13 number. What's the actual page number that you want her
14 to look at?

15 MS. JOHNSON: Page number 2 to -- 11:30

16 MS. CONDO: Starting at page number 2. She has
17 the page number now.

18 THE WITNESS: Can you repeat the question.

19 MS. JOHNSON: Yeah. Sure. No problem.

20 Q BY MS. JOHNSON: So are these services listed 11:30
21 in the Scope of Services -- could you please identify
22 what those services are. Let's start there. Can you
23 identify the shared services that are set forth in Scope
24 of Services.

25 A You want me to read them all? 11:30

1 Q Yes, please.

2 A Treasury Services; Governance Services;
3 Human Resource Services, including personnel
4 recruitment and lending of personnel, employee
5 relations, policy administration, employee benefits, and 11:31
6 termination;

7 Administrative Services; medical services and
8 records; insurance, tax, and financial services,
9 including accounts payable and receivables, bank
10 reconciliations, financial reports, year-end 11:31
11 adjustments, auditor interface and Form 990, and state
12 tax form preparation;

13 Contract and legal matters; preparation of
14 budgets and programs; purchasing and shipping of
15 materials, supplies, and equipment; coordination of 11:31
16 operations; solution of technical operational problems,
17 including intel technology; geological and geophysical
18 services; research; engineering, and construction;
19 shared facilities and related matters.

20 Q So, Ms. Endries, what does this agreement -- 11:31
21 what does this agreement give Chevron Corporation the
22 authority to do on behalf of the other signatories to
23 this agreement?

24 A It allows Chevron Corporation to arrange for
25 these services. 11:32

1 Q So going back to the question, if anyone is
2 ever an agent for Chevron Corporation, is it true that
3 pursuant to this agreement Chevron Corporation, then,
4 contracts with third parties for the services that you
5 just described in some cases? 11:32

6 MS. CONDO: Object to the form of the question.
7 You may answer it.

8 THE WITNESS: I don't believe -- I believe in
9 your --

10 MS. CONDO: I'm sorry. Can you repeat the 11:33
11 question or have the court reporter read it back.

12 THE WITNESS: Yeah. I'm not sure what you're
13 asking me.

14 MS. JOHNSON: I'll repeat the question.

15 Q BY MS. JOHNSON: Ms. Endries, what is your 11:33
16 understanding of the effect that this agreement has for
17 Chevron Corporation to contract with third parties to
18 provide the Scope of Services that you just identified?

19 A This agreement allows Chevron Corporation to
20 provide services and its affiliates. 11:33

21 Q So Chevron Corporation itself -- let's go to an
22 example here. Let's go to geological and geophysical
23 services. Now, how would an affiliate notify Chevron
24 Corporation and say, Hey, we need this service, we need
25 geological and geophysical services to Chevron 11:34

1 Corporation? What does that process look like
2 administratively?

3 A Subsidiary or affiliate likely would not ask
4 for geological and geophysical services. However, if
5 Chevron Corporation on its own asks for research and 11:34
6 obtained research independently and a subsidiary or
7 affiliate asked to see that research, then maybe Chevron
8 Corporation would provide that research to the
9 subsidiary affiliate.

10 Chevron Corporation does not do business. It's 11:34
11 a holding company. And so it does not provide
12 geological and geophysical services, but they could --
13 Chevron Corporation could seek research or information
14 about geological and geophysical services and share that
15 with a subsidiary affiliate. 11:35

16 Q So I'm a little bit confused because I think
17 that you testified -- and correct me if I'm wrong --
18 that Chevron Corporation is the entity that provides
19 these services; correct?

20 A Not all services, I don't believe what you 11:35
21 think services are. Chevron can purchase research
22 information from somebody else, a third party, a
23 non-related party, obtain that for its own information.

24 And then if a subsidiary or affiliate would
25 like to see that information, Chevron Corporation could 11:35

1 provide that information through the services agreement.

2 Q And do you know if Chevron Corporation had any
3 geological or geophysical services that it provided to
4 any subsidiary or affiliate on the property owned by
5 Mr. Latkanich? 11:36

6 A I'm not aware of any services provided.

7 Q And did you review -- I'm sorry. How did you
8 check to ensure that there were no services that Chevron
9 Corporation either did themselves or contracted for in
10 the Latkanich matter? 11:36

11 A Discussed with legal counsel. And I checked
12 our governance database.

13 Q So if we go back through this list of Scope of
14 Services, so it looks as though it really easily
15 identifies treasury services and governance services, 11:36
16 and there's a legal component as well.

17 But would all of these other items, C through
18 M, this information, where would documents relating to
19 items C through M be kept within Chevron Corporation?

20 A I can't answer that. I don't know. 11:37

21 Q And did you look for documents in each of these
22 categories, C through L, in preparation for this
23 deposition?

24 I'm sorry?

25 A I did not. 11:37

1 Q So one of the other things that I wanted to ask
2 about -- and then we can take a break -- is when they
3 use -- when Chevron Corporation -- what is the
4 administrative process by which Chevron Corporation --
5 and if geological is not a good example, then what about 11:38
6 coordination of operations? How would administratively
7 that work where an affiliate requests these services?
8 How does that get put into play administratively?

9 A Well, for example, the Treasury Department will
10 provide treasury services to some of the subsidiaries 11:38
11 and affiliates. So Chevron Corporation's Treasury
12 Department. So you may see Chevron Corporation's
13 Assistant Treasurer on some of the Chevron Corporation's
14 subsidiaries, and that is because those Chevron
15 Corporation Assistant Treasurers are subject matter 11:38
16 experts, and it is more efficient to provide those
17 services from an expert, who is already doing a similar
18 job, to the subsidiaries and affiliates.

19 Likewise, I am on Chevron Corporation as an
20 Assistant Secretary. I may also be on other 11:39
21 subsidiaries as Secretary or Assistant Secretary because
22 I'm a subject matter expert, and it is more efficient
23 for me to provide those services than to hire somebody
24 else to do them.

25 Q Okay. Thank you. 11:39

1 1 MS. JOHNSON: Yeah. Why don't we take, I would
2 2 say, a 15-minute break. It's 2:39. And then I will
3 3 mark these exhibits as the 2021 agreement and the 2022
4 4 agreement, and I'll email those around right before we
5 5 come back from the break. Does that work everybody? 11:39

6 6 MS. CONDO: Yeah. You don't need to email
7 7 them. If you just put on the record what the exhibit
8 8 number is, that's fine. But we just need the exhibit
9 9 number for each on the record.

10 10 MS. JOHNSON: All right. Great. 11:39

11 11 MS. CONDO: Okay. Thank you.

12 12 THE VIDEOGRAPHER: This marks the end of media
13 13 number 1. The time is 11:40 a.m. We are off the
14 14 record.

15 11:40 15 (A break was taken from a.m. to
12:04 p.m.) 11:40

16

16 16 THE VIDEOGRAPHER: This marks the beginning of
17 17 media number 2. The time is 12:04 p.m. We are back on
18 18 the record.

19

19 MS. JOHNSON: Thank you.

20

20 Q BY MS. JOHNSON: Ms. Endries, before we get 12:04
21 21 back into these agreements, I just wanted to follow up
22 22 with respect to --

23

23 The attorney from Jones Day -- and I'm sorry; I
24 24 can't remember his name -- did he attend preparation
25 25 sessions in order to prepare for this deposition today? 12:04

1 A No.

2 Q So is it your testimony that he was not in any
3 meeting or on any phone calls for which you prepared for
4 this deposition?

5 A That is my testimony. Today is the first day 12:05
6 I've met him, first time I've met him.

7 MS. CONDO: Lisa, before we proceed, can we
8 mark those two exhibits before we lose track? Exhibit
9 number for the 2021 agreement and the exhibit number for
10 the 2022 agreement. 12:05

11 MS. JOHNSON: We can call them exhibits -- the
12 2021 agreement can be Exhibit 18. The 2022 agreement
13 can be Exhibit 19.

14 MS. CONDO: Thank you.
15 (Plaintiffs' Exhibit 18 was marked for identification.) 12:05
16 (Plaintiffs' Exhibit 19 was marked for identification.)

17 Q BY MS. JOHNSON: Ms. Endries, are you ready to
18 go?

19 A Yes.

20 Q So going back to -- I'm going to share my 12:05
21 screen again. Okay. Can you see my screen now?

22 I'm sorry?

23 A Yes.

24 Q So we'll go to Exhibit 18, which is the 2021
25 agreement. 12:06

1 So going to the 2021 agreement, the list of
2 services non-exhaustive. Do you see that?

3 A Yes.

4 Q And was there -- you had testified that there
5 may have been another agreement in place between the 12:06
6 years 2011 and 2021; is that correct?

7 A I don't know if there was an agreement in
8 place. I have not seen it, if there was one.

9 Q So the Exhibit 18, the 2021 agreement, is the
10 first shared services agreement and the only one that 12:07
11 you were aware of? That was the first agreement that
12 you're aware of; is that right?

13 A Yes.

14 Q So you were in the same position that you're in
15 now, you testified, from 2011 through the present; is 12:07
16 that correct?

17 A Yes.

18 Q And you were an officer of Chevron U.S.A.,
19 Inc., at the time; is that correct?

20 A Yes. 12:07

21 Q So when Chevron Appalachia was operating in
22 Pennsylvania, what was Chevron U.S.A.'s provision of
23 services to Chevron Appalachia for the operations in
24 Pennsylvania?

25 A Treasury services, governance services. 12:08

1 MS. CONDO: I'm sorry, Lisa. Maybe I misheard.
2 Did you ask what Chevron U.S.A.'s services were for
3 Chevron Corp. or what Chevron Corp. services were for
4 Chevron U.S.A.?

5 Q BY MS. JOHNSON: Ms. Endries, when Chevron 12:08
6 Appalachia was operating in Pennsylvania, how did they
7 obtain the services that they needed? Did Chevron
8 U.S.A. provide the services that are listed on this list
9 of services, or did Chevron Corporation provide those
10 services to Chevron Appalachia? 12:08

11 A Chevron Corporation provided some of those
12 services.

13 Q And which services did they provide to Chevron
14 Appalachia?

15 A Treasury likely, controllers likely, and 12:09
16 governance. Possibly tax.

17 Q What about site coordination?

18 A Can you expand on what you mean by "site
19 coordination."

20 Q So, for example, on the Latkanich property, are 12:09
21 you aware of the facilities that were on the Latkanich
22 property?

23 A No.

24 Q In your position as an officer of Chevron
25 U.S.A. -- so Chevron U.S.A. is the parent company or was 12:09

1 the parent company of Chevron Appalachia; is that
2 correct?

3 A It was indirect parent company of Chevron
4 Appalachia.

5 Q And so in your role as an officer of Chevron 12:09
6 U.S.A., did you get reports about Chevron Appalachia's
7 business operations in Pennsylvania?

8 A No, I did not. I was an Assistant Secretary of
9 Chevron Appalachia. Possibly maybe a secretary. I
10 cannot remember. And I am Secretary of Chevron U.S.A., 12:10
11 Inc. And as Secretary, I would not be provided reports
12 of investments. My so responsibility as Secretary would
13 be to prepare governance documents if needed for Chevron
14 Appalachia.

15 Q So did you say you were an officer of Chevron 12:10
16 Appalachia?

17 A Possibly. I would have to go back. I did
18 print it out.

19 MS. JOHNSON: Do we have a copy of what she's
20 looking at, Kathy? 12:10

21 MS. CONDO: I don't know what she's looking at
22 at this point, Lisa.

23 No, I don't think you have this because I don't
24 think it was called for. It's the appointment history
25 of Chevron Appalachia, LLC, with officers and directors 12:11

1 of Chevron Appalachia, LLC.

2 MS. JOHNSON: I would ask that that be marked
3 as an exhibit and submitted for today.

4 MS. CONDO: Is there an exhibit number you want
5 to give it, Lisa? 12:11

6 MS. JOHNSON: Exhibit 20 is the next one.

7 THE WITNESS: I was Secretary of Chevron
8 Appalachia, LLC. My role would have been strictly
9 governance related.

10 (Plaintiffs' Exhibit 20 was marked for identification.) 12:11

11 Q BY MS. JOHNSON: So what tasks did that
12 involve, governance-related duties for Chevron
13 Appalachia? What does that mean?

14 A Governance-related activities are governing
15 documents. I might have worked on the bylaws, 12:11
16 certificate of formation, operating agreement, minutes.
17 Chevron Appalachia, LLC, had some management -- had its
18 own management. That management would run the
19 day-to-day business.

20 As a Secretary, I would just simply take the 12:12
21 minutes or draft written consent. We have Assistant
22 Secretaries that also do that. So I would not see
23 business operation documents.

24 Q And how long were you an officer of Chevron
25 Appalachia? 12:12

1 A From 2011 to 2020.

2 Q Were there other officers of Chevron Appalachia
3 who were also officers of Chevron U.S.A., Inc.?

4 A Likely. There would likely be treasury
5 officers that provided treasury services, tax officers 12:13
6 that would provide tax services for both companies, and
7 controller. Possibly controller.

8 Q You had said that Chevron Appalachia had its
9 own management. Who were those officers that performed
10 the separate management duties of Chevron Appalachia? 12:13

11 A Be president and certain business
12 vice-presidents.

13 Q Do you remember any of their names?

14 A Stacey Olson was president from 2016 to 2020.
15 Bruce Niemeyer was president from 2011 to 2013. Tom 12:14
16 Burlas was president for just a month in 2020. And
17 Nigel Hearne was president from 2013 to 2016.

18 Q Thank you.

19 So as part of the responsibilities as an
20 officer of Chevron Appalachia, did you participate in 12:14
21 preparing annual reports?

22 A No. Chevron Appalachia would not prepare
23 annual reports. It's not a public company. It's a
24 wholly-owned.

25 Q So how would you take the information, the 12:15

1 financials, from Chevron Appalachia and translate them
2 forward? Describe that process by which Chevron
3 Appalachia generated revenue and how that revenue was
4 paid to Chevron Corporation.

5 MS. CONDO: Objection. Vague and ambiguous. 12:15
6 Go ahead. You can answer.

7 THE WITNESS: I have no knowledge of how the
8 business portion of Chevron Appalachia worked. I have
9 no knowledge of how Chevron Appalachia would collect
10 that information. That was not part of my role. 12:15

11 Q BY MS. JOHNSON: As a designee of Chevron
12 Corporation, putting your different hat on, did you do
13 any preparation of the activities of Chevron Appalachia
14 with respect to shared services from Chevron Corporation
15 as part of your preparation for this deposition? 12:16

16 A No.

17 Q So with respect to payments -- and I mention
18 "payments" because Exhibits 18 and 19, these shared
19 services agreements, contemplate that the affiliate or
20 subsidiary would make payments to Chevron Corporation. 12:16
21 Are you aware of the payments that were made from
22 Chevron U.S.A. to Chevron Corporation for services under
23 this agreement?

24 MS. CONDO: Object to the form of the question
25 to the extent it mischaracterizes the Exhibits 18 and 12:16

1 19.

2 THE WITNESS: I have no knowledge of the
3 payments. I'm not involved with that area.

4 Q BY MS. JOHNSON: Have you ever seen receipts of
5 payments with respect to the services in either the 12:17
6 agreement Exhibit 18 or the agreement as Exhibit 19?

7 A No. That would not come through the governance
8 area.

9 Q Where would those payments -- where would
10 receipts for those payments be located within the 12:17
11 documents -- within Chevron Corporation's documents?

12 MS. CONDO: Object to the form of the question.
13 You can answer.

14 THE WITNESS: Likely, controllers. It would be
15 captured at -- I don't know if it would be Chevron 12:17
16 Corporation or Chevron U.S.A., Inc.

17 Q BY MS. JOHNSON: Are you aware of any payments
18 from Chevron Appalachia to Chevron Corporation for
19 services under either of these agreements?

20 A No. 12:17

21 Q Are you aware of any payments from Chevron
22 Appalachia to either Chevron U.S.A. or Chevron
23 Corporation for Chevron Appalachia's operations from
24 2011 through the time it sold its assets to EQT?

25 A No. 12:18

1 Q Are you aware that payments were made?

2 MS. CONDO: Object to the form of the question.

3 Payments by whom? to whom? for what?

4 Q BY MS. JOHNSON: Ms. Endries, you can answer

5 the question. 12:18

6 A No, I'm not aware.

7 Q So with respect to Chevron Appalachia and its

8 operations in Pennsylvania, you were Secretary, you

9 stated, through that period, from 2011 until they sold

10 their assets to EQT; is that correct? 12:19

11 I'm sorry?

12 A Yes.

13 Q And did you receive notification of any

14 complaints with respect to water supply issues or other

15 issues with respect to Chevron Appalachia's oil and gas 12:19

16 operations in Pennsylvania?

17 A Chevron Corporation did not receive any

18 notification.

19 Q Did Chevron Appalachia?

20 A Chevron Appalachia, not to my knowledge. I did 12:19

21 not receive those. They did not come through me.

22 Q You never received any complaints about water

23 supply or environmental contamination with respect to

24 Chevron Appalachia's operations?

25 A I did not. 12:19

1 Q And which databases did you look in to see if
2 Chevron Corporation had received notification of
3 complaints regarding Chevron Appalachia's business
4 operations in Pennsylvania?

5 A I looked through the governance database. 12:20

6 Q And is that typically where complaints would be
7 filed, in the governance database?

8 A Not necessarily.

9 Q So where would complaints typically be filed?

10 A Legal department. 12:20

11 Q Legal department.

12 And did you check with the legal department to
13 see if there were any complaints that Chevron
14 Corporation had received with respect to any of Chevron
15 Appalachia's business operations in Pennsylvania? 12:20

16 A Yes.

17 Q I'm sorry?

18 A Yes.

19 Q And what did the legal department report to you
20 with respect to the existence of complaints that Chevron 12:20
21 Corporation may have received regarding Chevron
22 Appalachia's business operations in Pennsylvania?

23 A All I have is what has been handed to me for
24 the interros and your exhibit. This is what I was
25 provided. 12:21

1 Q So who provided that to you?

2 A Legal.

3 Q And by "legal," who do you mean?

4 A Al Rosenthal.

5 Q And had you ever seen anything in that binder 12:21
6 that he gave to you before?

7 A No.

8 Q And when did you receive that binder?

9 MS. CONDO: Object to the form of the question.

10 When did she receive the actual physical binder, or when 12:21
11 did she receive for the first time information that's
12 contained in the binder? Which do you want to know?

13 Because otherwise it could be two different answers.

14 Are you not going to clarify that, Lisa?

15 MS. JOHNSON: I don't answer your questions. 12:22
16 But thanks, Kathy.

17 Q BY MS. JOHNSON: Ms. Endries, did you
18 understand the question?

19 A You asked when did I receive the binder?

20 Q Yes, ma'am. 12:22

21 A I received the binder last week, I believe. I
22 received some documents prior to that.

23 Q So can you identify what is in that binder? Is
24 there a table of contents?

25 A Yes. 12:22

1 MS. JOHNSON: And I'd like to have the binder
2 and its contents entered as Exhibit 21.
3 (Plaintiffs' Exhibit 21 was marked for identification.)

4 MS. CONDO: Okay.

5 Q BY MS. JOHNSON: Could you please read the 12:22
6 table of contents for me, Ms. Endries.

7 THE COURT REPORTER: I'm sorry. I can't
8 understand you.

9 MS. CONDO: I don't know why. We're pretty
10 close here but.... 12:23

11 THE WITNESS: 42 Pa.C.S.A. Section 5322, Basis
12 of personal jurisdiction over persons outside this
13 commonwealth; Chevron Corporation's Objections and
14 Responses to Plaintiffs' First Set of Jurisdictional
15 Interrogatories and Request for Production of Documents; 12:23

16 Chevron Corporation's Supplemental Objections
17 and Responses to Plaintiffs' First Set of Jurisdictional
18 Interrogatories and Requests for Production of
19 Documents;

20 Chevron Corporation's Objections to Plaintiffs' 12:23
21 Notice of Deposition Directed at Chevron Corporation's
22 Corporate Representative; Form S-3 ASR Registration
23 Statement;

24 Indenture Amongst Chevron U.S.A., Inc., and
25 Chevron Corporation and Deutsche Bank dated 8-12-2020; 12:24

1 First Supplemental Indenture Amongst Chevron U.S.A.,
2 Inc., and Chevron Corporation and Deutsche Bank dated
3 8-12-2020; Second Supplemental Indenture Amongst Chevron
4 U.S.A., Inc., and Chevron Corporation and Deutsche Bank
5 dated 1-6-2021; 12:24

6 Underwriting Agreement Standard Provisions;
7 Intercompany Counsel and Service Agreement between
8 Chevron Corporation and Chevron U.S.A., Inc., and
9 certain affiliates of Chevron Corporation dated
10 1-1-2021; Counsel, Service, and Support Agreement dated 12:25
11 2-1-2022.

12 Q Thank you, Ms. Endries.

13 So going back to the guarantor documents and
14 the debt security documents for the indenture and the
15 note between Chevron Corporation and Chevron U.S.A., I 12:25
16 will pull up the documents, but just generally, can you
17 describe what that transaction -- what that transaction
18 is between Chevron U.S.A. and Chevron Corporation.

19 A Which one do you want? The Chevron U.S.A.,
20 Inc., and Chevron Corporation's and Deutsche Bank Trust 12:26
21 Company for supplemental indenture?

22 Q Yeah. Let's start with that.

23 A So Chevron U.S.A., Inc., issued debt -- public
24 debt, and as a condition of accepting that debt,
25 Deutsche Bank required Chevron Corporation to guarantee 12:26

1 Chevron U.S.A. Inc.'s performance on that debt.

2 Q And I had seen there were a couple of different
3 years. It seems like this has been a successive, I
4 guess, renewal for lack of a better term. But what's
5 the earliest that you remember Chevron Corporation 12:27
6 acting as a guarantor to Chevron U.S.A., Inc., for any
7 reason, including this reason?

8 A I cannot answer that exactly. It is not
9 uncommon for Chevron Corporation to guarantee
10 performance of a subsidiary. 12:27

11 Q Sorry. Go ahead. I didn't mean to interrupt
12 you.

13 A I don't know that it's the first time I've ever
14 seen something like that.

15 Q Do you know the reason why it was required that 12:27
16 Chevron Corp. had to guarantee the issuance of this
17 debt?

18 A So Chevron U.S.A., Inc., is a wholly-owned
19 subsidiary of Chevron Corporation, is not a public
20 company. And investors would not want to invest without 12:27
21 seeing financials. Chevron U.S.A., Inc., does not have
22 public financial statements.

23 And so a requirement of issuing that debt would
24 be Chevron Corporation guaranteeing Chevron U.S.A.,
25 Inc., 's debt issuance. Chevron Corporation does have 12:28

1 public financial statements. It is a public company.

2 Q And do you know how much debt Chevron
3 Corporation guarantees for Chevron U.S.A., Inc.?

4 MS. CONDO: Object to the form of the question.
5 Vague and ambiguous with respect to time period. 12:28

6 THE WITNESS: I don't. I can't answer that.

7 Q BY MS. JOHNSON: So let's go to the documents
8 here. I think you had signed as a guarantor, a Power of
9 Attorney. Let's see here. Where is this?

10 MS. CONDO: Again, Lisa, I just ask when you 12:28
11 pull those up, if they're already marked as part of an
12 exhibit you say that or if you're going to mark them as
13 a new exhibit you say that so the record is clear what
14 document is being addressed.

15 Q BY MS. JOHNSON: So, Ms. Endries, do you 12:29
16 remember acting as Power of Attorney in that
17 transaction?

18 A Yes.

19 Q And what were you told about that transaction
20 at the time in order to be granted a Power of Attorney? 12:29

21 MS. CONDO: And, again, I object with respect
22 to "that transaction." This is a housekeeping but
23 important housekeeping objection. We need to know what
24 we're looking at. So please identify the document.

25 Q BY MS. JOHNSON: So do you remember any 12:29

1 conversations that you had, Ms. Endries, at the time
2 before you acted as a Power of Attorney in any capacity?

3 MS. CONDO: Object to the form of the question.
4 In any capacity for any agreement?

5 THE WITNESS: So this is a filed document. I 12:30
6 am Assistant Secretary of Chevron Corporation. And I
7 believe no one else was available to sign that day. So
8 I was asked to sign for the guarantee.

9 MS. CONDO: And, again, since Ms. Johnson
10 doesn't want to do it, could you please identify by 12:30
11 Bates Number the document that you just testified about.

12 THE WITNESS: Bates Number is 0013361.

13 Q BY MS. JOHNSON: So you must have a different
14 copy in front of you. This was attached to -- so this
15 is Exhibit D. And this was attached to a filing with 12:30
16 the court. So in the Endries depo exhibits, this is
17 Exhibit D, and it's the third, fourth -- fourth page
18 here, this Power of Attorney.

19 MS. CONDO: So just to clarify, I think this
20 was Exhibit D to answers to interrogatories, not a file 12:31
21 with the court. And, again, I'm not trying to pick at
22 this. It's just all of us need a clear record about
23 this.

24 So I believe that what you are referring to is
25 Exhibit D to what you've already marked as Exhibit 4, 12:31

1 which are the Supplemental Responses -- if that's
2 incorrect, please correct the record -- but, otherwise,
3 I think that's what it is.

4 Q BY MS. JOHNSON: So, Ms. Endries, let me go
5 back to what you testified to. You stated on this 12:31
6 particular day there were no other signatories. So they
7 asked you to sign this. Is that correct?

8 A I believe. The notice was three years ago. I
9 don't remember the exact conversation. But often, often
10 I am asked to sign when nobody else is available. 12:31

11 Q And who did you have a conversation with about
12 signing this Power of Attorney?

13 A I cannot recall.

14 Q And the other officers listed there -- Mary
15 Francis, Christopher Butner, and Christine Cavallo -- at 12:32
16 the time were any of those people also officers of
17 Chevron Corporation and Chevron U.S.A., Inc.?

18 MS. CONDO: Object to the form of the question
19 to the extent it presumes they were officers and then it
20 asks her if they were. 12:32

21 But you can answer.

22 THE WITNESS: They were not.

23 Q BY MS. JOHNSON: So in this document here --
24 let's go back up to -- let's see -- it's page 20- -- it
25 starts on page 208 out of 656 of my deposition exhibit. 12:33

1 So, Ms. Endries, have you ever seen this letter
2 before?

3 MS. CONDO: And I would just indicate we do not
4 have the deposition exhibits. So that really doesn't
5 help us out. But for the record, you appear to be 12:33
6 showing an August 3, 2023, Morgan Lewis letterhead re
7 Registration Statement on Form S-3.

8 THE WITNESS: I have not seen this.

9 Q BY MS. JOHNSON: And so at the time you had
10 signed your Power of Attorney, were the amounts of the 12:33
11 guarantee discussed? "No"?

12 A Not to me.

13 MS. JOHNSON: So let's go down to -- give me
14 one second here. I'll circle back on this question
15 regarding the amounts just so -- for the purposes of 12:34
16 moving on here.

17 Q BY MS. JOHNSON: So how many -- are you aware
18 of how many times Chevron Corporation has guaranteed
19 obligations of Chevron U.S.A., Inc.?

20 A I am not aware. 12:34

21 Q And are you aware of any instances in which
22 Chevron Corporation guaranteed any debt of Chevron
23 Appalachia?

24 A No.

25 Q When you were looking for -- when you were 12:35

1 preparing for this deposition, did you look for other
2 loan documents in preparing for this deposition?

3 MS. CONDO: Object to the form of the question.
4 Loan documents with respect to whom and what?

5 THE WITNESS: No. 12:35

6 Q BY MS. JOHNSON: And let's go back through
7 here. Let's go to Exhibit 18.

8 Are you aware if any of these services were
9 provided to Chevron Appalachia by either Chevron U.S.A.,
10 Inc., or Chevron Corporation? 12:36

11 A I'm only aware of Chevron Corporation services,
12 which would be governance, treasury, controllers.

13 Q And so pursuant to -- if there was an agreement
14 similar to this in place -- I'm saying hypothetically --
15 is it true that the subsidiaries or affiliates that are 12:36
16 parties to this agreement, 2021 agreement, have to
17 reimburse Chevron Corporation for those services? Is
18 that correct?

19 MS. CONDO: Object to form as a hypothetical.
20 You may answer. 12:36

21 THE WITNESS: My understanding is that there is
22 some form of compensation.

23 Q BY MS. JOHNSON: And which -- is there one
24 company -- does Chevron Corporation purchase -- let's
25 say, for example, does it have an agreement with any 12:37

1 chemical companies to wholesale-buy certain chemicals
2 for use by its subsidiaries? Is there anything like
3 that that exists?

4 A No. Chevron Corporation is a holding company.
5 It doesn't have any operations. It invests in other 12:37
6 companies.

7 Q But pursuant to these two agreements,
8 Exhibit 18 and 19, Chevron Corporation engages in
9 operations through third parties; correct?

10 A It does not. Chevron Corporation may provide 12:37
11 services to its subsidiaries and affiliates. Nowhere
12 does it say Chevron Corporation engages with third
13 parties.

14 Q So, for example, Chevron Corporation, if it
15 needed some kind of compliance work for a regulatory 12:38
16 issue, if Chevron Corporation was going to provide that
17 service, wouldn't they engage a third party to provide
18 that service?

19 A Chevron Corporation, if the chief compliance
20 officer wanted to engage with a third party, the chief 12:38
21 compliance officer could do that. It would be Chevron
22 Corporation. But this agreement that we're talking
23 about has nothing to do with that.

24 Q So in this agreement, though, it reads as
25 though Chevron Corporation has the authority to contract 12:38

1 with third parties to provide these services listed; is
2 that correct?

3 A That's correct. But Chevron Corporation
4 wouldn't use those services for itself, and Chevron
5 Corporation likely wouldn't do that. It's just allowing 12:39
6 Chevron Corporation to do that.

7 Q So are you aware of any instances in which
8 Chevron Corporation has provided services to Chevron
9 U.S.A., Inc.?

10 I'm sorry? 12:39

11 A Yes. Governance, treasury, controllers, tax.

12 Q And who did Chevron Corporation contract with
13 to provide those services to Chevron U.S.A., Inc.?

14 MS. CONDO: Objection to the form of the
15 question. Misstates her answer. 12:39

16 Go ahead. You can answer.

17 THE WITNESS: For example, I am an employee of
18 Chevron Corporation, and I provided governance services
19 for Chevron U.S.A., Inc. I was not a third party. I
20 just provided services per this agreement. 12:39

21 Q BY MS. JOHNSON: And that's in your situation.
22 But, for example, if one of the services that were
23 needed was downstream chemicals and midstream legal,
24 Chevron Corporation would engage a third party to
25 provide those services; correct? 12:40

1 A Incorrect.

2 Q Who would they engage to provide those
3 services, then?

4 A They wouldn't. Chevron U.S.A., Inc., or a
5 subsidiary involved would engage third party services on 12:40
6 its own.

7 Q And where are those contracts?

8 A I don't know. Somewhere within those
9 organizations' databases. I don't know.

10 Q So if we wanted to find all of the agreements 12:40
11 and documents with respect to Chevron Appalachia's
12 operations on the Latkanich wellsite and how those
13 services were procured by Chevron Appalachia, where
14 would we find those documents?

15 MS. CONDO: Objection. Beyond the scope of the 12:41
16 deposition notice. But she can tell you what she knows.

17 THE WITNESS: You would reach out to the
18 ultimate -- Chevron Appalachia and, I think, Chevron
19 Northeast has been sold. So the parent of those two,
20 which would be Chevron U.S.A., Inc. You would seek 12:41
21 those documents from Chevron U.S.A., Inc.

22 Q BY MS. JOHNSON: And did you seek these
23 documents from Chevron U.S.A., Inc., in preparation for
24 this deposition?

25 MS. CONDO: Objection. Goes beyond the scope. 12:41

1 We're now talking about seeking documents of Chevron
2 U.S.A. with regard to operations on the Latkanich
3 property, which are the proper subject of merits
4 discovery and are in the process of being produced
5 through that discovery but go well beyond the scope of 12:41
6 this corporate designee notice to Chevron Corp.

7 Go ahead. You can answer.

8 THE WITNESS: I did not.

9 Q BY MS. JOHNSON: And would Chevron U.S.A.,
10 Inc. -- were they the ones managing the contracts and 12:42
11 the services that Chevron Appalachia used in
12 Pennsylvania?

13 MS. CONDO: Objection. Goes beyond the scope
14 of the corporate designee notice.

15 But she can answer if she knows. 12:42

16 THE WITNESS: No. Chevron Appalachia, LLC,
17 would manage those contracts.

18 Q BY MS. JOHNSON: And so you had testified
19 earlier that you were an officer of Chevron Appalachia,
20 Chevron U.S.A., and Chevron Corporation; is that true? 12:42

21 A Yes.

22 Q And were you an officer of all three of those
23 entities at the same time until Chevron Appalachia was
24 sold?

25 A Yes. 12:42

1 Q So with respect to knowledge of what is
2 happening at Chevron Appalachia and moving up through
3 Chevron Corporation, how did Chevron Appalachia transmit
4 information to Chevron U.S.A., particularly between --
5 because of the fact it's the same officer so you would 12:43
6 have knowledge of what was happening at Chevron
7 Appalachia as an officer of Chevron Appalachia. Then
8 that knowledge would be subsumed in Chevron U.S.A. and
9 so forth.

10 So what was the process by which you shared 12:43
11 information about Chevron Appalachia to Chevron U.S.A.?

12 MS. CONDO: Objection. Beyond the scope of a
13 corporate designation. Misstates the prior testimony.
14 And this has already been asked and answered previously
15 with respect to this witness's involvement or lack 12:43
16 thereof in obtaining information with respect to Chevron
17 Appalachia.

18 Go ahead. You can tell her again.

19 THE WITNESS: I did not share information. I
20 was Secretary. I provided governance services. My 12:44
21 governance services would not be shared with the parent
22 company or the parent's parent. It's a not a business
23 transaction. It's just a formality.

24 Q BY MS. JOHNSON: And then what about between
25 Chevron U.S.A., Inc., and Chevron Corporation? How does 12:44

1 information get transferred from Chevron U.S.A. to
2 Chevron Corporation?

3 A Again, I provide governance services. I don't
4 share my governance services with Chevron Corporation,
5 you know, for my services with its subsidiaries. I 12:44
6 don't know how the business units -- or the business
7 operations would be shared with its parent. I'm sure
8 business performances would be, but I don't know how.

9 Q Okay. So let's go back to -- have you ever
10 been to Southwestern Pennsylvania, Ms. Endries? 12:45

11 A No.

12 Q Have you ever traveled to Pennsylvania?

13 A Yes.

14 Q Have you ever traveled to Pennsylvania in the
15 capacity as an officer or an employee of Chevron 12:45
16 Corporation?

17 A No.

18 Q So are you aware of any other employee of
19 Chevron Corporation who has traveled to Pennsylvania
20 between the years of 2011 and present? I'm sorry. I 12:45
21 can't hear you.

22 A Yes.

23 Q And what visit was that?

24 A I believe our chairman and CEO went to
25 Pennsylvania at one point, and I believe our Secretary 12:46

1 and some of the executives went to Pennsylvania for a
2 board trip.

3 Q And when was that?

4 A I don't know the exact date.

5 MS. CONDO: I would just indicate it's provided 12:46
6 in our answers to interrogatories.

7 Q BY MS. JOHNSON: Was it within the last few
8 years? Was it more than a few years ago?

9 MS. CONDO: Why don't you give her a chance to
10 look at the interrogatory answer so she can provide that 12:46
11 without speculating.

12 THE WITNESS: The Chevron Board of Directors
13 went to Pennsylvania on September 29th and 30th, 2015.

14 Q BY MS. JOHNSON: And what was the purpose of
15 that meeting? 12:47

16 A The purpose of the board meeting?

17 Q Correct. What was on the agenda?

18 A I don't know that. I don't know if we'd share
19 that agenda. But it was a board trip. But every now
20 and then the board wants to see some of its 12:47
21 investments -- Chevron Corporation's investments. And

22 so maybe once every other year a board trip will go to
23 one of the locations of an investment, and they may look
24 at the site just to see what Chevron's investments are.

25 Q And do you know what sites the board visited in 12:48

1 2015 when they visited?

2 A I don't, no. I was not included in that trip.

3 Q And so when this information was provided in an
4 interrogatory, who provided that information for that
5 interrogatory? 12:48

6 A Legal.

7 Q And did you then inquire throughout the
8 company -- throughout Chevron Corporation as to the
9 intent, nature, and scope of that board visit?

10 A No. I don't believe I need to inquire. I know 12:48
11 the intent was to visit the location of one of Chevron
12 Corporation's investments.

13 Q And do you know which investment that was?

14 A It was -- I just know it's the Appalachia
15 Mountain Business Unit that was being visited. 12:49

16 Q Do you know who attended that?

17 MS. CONDO: Asked and answered. You can tell
18 her again.

19 THE WITNESS: Chevron Corporation's CEO and the
20 General Counsel and Corporate Secretary. 12:49

21 Q BY MS. JOHNSON: And what are their names?

22 A Mike Wirth; Hew Pate, H-e-w, P-a-t-e; Mary
23 Francis, F-r-a-n-c-i-s.

24 Q And how long was that visit? Do you know?

25 A I believe it was two days. 12:49

1 Q And are you aware of any other visits by any
2 Chevron Corporation employee?

3 A I'm not aware of other visits from an employee.

4 Q And so with respect to -- you had mentioned
5 previously investments. We briefly started talking 12:50
6 about some of the documents that have been provided to
7 the SEC. I'm going to pull up one other document here.
8 So let's go to....

9 I'm circling back, Ms. Endries, to what is in
10 here, actually. And I may need to renumber some of 12:51
11 these exhibits; I apologize. This is in here as
12 Exhibit 20.

13 MS. CONDO: I'm sorry. Just on that, Lisa,
14 another housekeeping, I think -- I will certainly agree
15 that it's okay that these exhibits are out of order -- 12:51
16 numbered out of order, that there might be gaps in the
17 numbering. I think it's more important that we know as
18 there's being testimony about exhibits what the exhibit
19 is.

20 So I would suggest we not worry about 12:52
21 renumbering them to get them in order, the numbers you
22 are putting on them today. Let's just stipulate it's
23 okay that they're out of order and there's gaps.

24 MS. JOHNSON: Great. Thanks, Kathy.

25 Q BY MS. JOHNSON: So, Ms. Endries, have you ever 12:52

1 seen this document before?

2 A Yes.

3 Q And when did you see this document?

4 A When it was filed.

5 Q And what is this document? 12:52

6 A Form S-3, Registration Statement.

7 Q And who filed this statement?

8 A The securities lawyers at Chevron Corporation
9 filed this statement.

10 Q You see here that -- do you agree that Ms. Mary 12:53
11 Francis was listed as a Corporate Secretary and Chief
12 Governance Officer of Chevron Corporation? Do you agree
13 that that's what that states?

14 A Yes.

15 Q And I have moved down to the end of this 12:53
16 document.

17 MS. JOHNSON: And, Kathy, the Bates number is
18 0013303. It's part of the production that you made with
19 the indenture.

20 MS. CONDO: I'm sorry. Is this still part of 12:53
21 Exhibit 20?

22 MS. JOHNSON: Yes.

23 MS. CONDO: Okay.

24 Q BY MS. JOHNSON: Ms. Endries, would you agree
25 that this signature page is for Chevron U.S.A., Inc.? 12:53

1 A Yes.

2 Q And do you see here down to the left that Mary
3 Francis signed?

4 A Yes.

5 Q So was Ms. Francis an officer of both Chevron 12:54
6 Corporation and Chevron U.S.A., Inc., at the time of
7 this transaction?

8 A She was.

9 Q So she was just an officer of Chevron
10 Corporation? 12:54

11 A Yes.

12 Q So how is she signing here as an officer of
13 Chevron U.S.A., Inc., as Attorney-in-Fact?

14 A I think she has the Power of Attorney, the
15 Attorney-in-Fact. 12:54

16 Q To act as an officer for Chevron U.S.A., Inc.;
17 correct?

18 A I don't know the details of this. I don't know
19 if she's acting on behalf of Chevron U.S.A., Inc. But
20 she does have -- she's listed as Attorney-in-Fact, not 12:54
21 an officer of Chevron U.S.A., Inc.

22 Q So we're going to go back up to -- Ms. Endries,
23 I'd like you to take a look at this.

24 MS. JOHNSON: Kathy, it's Bates page 0013281.

25 Q BY MS. JOHNSON: Ms. Endries, are you familiar 12:55

1 with the summarized financial information that's listed
2 here?

3 MS. CONDO: And this is also part of
4 Exhibit 20, Lisa?

5 MS. JOHNSON: Yeah. 12:55

6 MS. CONDO: Okay.

7 THE WITNESS: I'm aware of it. I'm not
8 familiar with it.

9 Q BY MS. JOHNSON: Okay. So I'm going to move
10 to -- let's see here. Ms. Endries, this is -- 12:56

11 MS. JOHNSON: Kathy, this is Exhibit 17.
12 (Plaintiffs' Exhibit 17 was marked for identification.)

13 Q BY MS. JOHNSON: Ms. Endries, are you aware of
14 any investments by the Commonwealth of Pennsylvania and
15 Chevron Corporation? 12:56

16 A I am not aware of any investments of the
17 Commonwealth of Pennsylvania and Chevron Corporation.
18 But there are an awful lot of investors in Chevron
19 Corporation. It would be hard to single anybody out.

20 Q So this Exhibit 17 -- it's just a printout that 12:57
21 we pulled with the sourcing from 13F filings of the
22 Commonwealth of Pennsylvania which includes purchases of
23 shares by PSERS, the Pennsylvania State Employee
24 Retirement System.

25 Are you aware of any -- what the process is for 12:57

1 institutional shareholders to purchase shares with
2 Chevron Corporation? Do you know if there's any special
3 process for government agencies?

4 A I'm not aware of what each individual investor
5 needs to report and why. I'm not aware of that. 12:57

6 MS. CONDO: And I would also just indicate this
7 goes beyond the scope of the corporate rep depo notice.

8 Q BY MS. JOHNSON: So are you aware of any other
9 major investors that live in Pennsylvania?

10 A No. 12:58

11 Q Are you aware of any other major investors that
12 are companies formed and governed by the laws of the
13 state of Pennsylvania?

14 MS. CONDO: Object to the form of the question.
15 You may answer. 12:58

16 THE WITNESS: Can you repeat the question.

17 MS. JOHNSON: Sure.

18 Q BY MS. JOHNSON: Are you aware of any
19 significant shareholders that are entities form- --
20 entities formed in the state of Pennsylvania? 12:58

21 A I'm not aware. I don't have individual
22 knowledge of that. I think this goes beyond the scope
23 of what I prepared for.

24 Q We can go back through the notice. I'm sure
25 Kathy and I will have plenty of briefing on this. But 12:59

1 it's certainly within the scope.

2 So let's move to Exhibit 10. Ms. Endries, I'll
3 give you a minute to take a look at this.

4 (Plaintiffs' Exhibit 10 was marked for identification.)

5 MS. CONDO: It's partially covered on the 12:59
6 screen. If there's a way to move it to the right. The
7 left-hand part of the document is hidden by some -- it's
8 still hidden by a -- I don't even know what you'd call
9 it. What's it called? A toolbox. It's hidden by a
10 toolbox. 12:59

11 MS. JOHNSON: Is that better?

12 MS. CONDO: No. It's the left-hand part of the
13 document we just can't see. I can see there's writing.
14 There we go. Okay.

15 Can you read that? 01:00

16 THE WITNESS: Yeah.

17 MS. CONDO: Okay. We can read it now. Are you
18 going to identify this with an exhibit number?

19 MS. JOHNSON: Yeah. It's Exhibit 10.

20 MS. CONDO: Okay. So I think you said that. 01:00

21 MS. JOHNSON: That's all right.

22 MS. CONDO: It's just this one page?

23 MS. JOHNSON: Yes.

24 MS. CONDO: Okay.

25 Q BY MS. JOHNSON: Ms. Endries, are you familiar 01:00

1 with the LANDEX document software program that companies
2 use in Pennsylvania?

3 I'm sorry?

4 A No.

5 Q So this is a printout from LANDEX. As I said, 01:00
6 it's a software program where certain counties register
7 and there are copies of various land documents filed.
8 Would you agree that this is an affidavit that was
9 filed, what this document states?

10 MS. CONDO: Object to the form of the question 01:01
11 as beyond the scope. And also with respect to, you're
12 asking her if this is an affidavit. This clearly isn't
13 an affidavit. It's some kind of printout that we've
14 never seen before. So are you asking her if this takes
15 the form of a sworn affidavit? 01:01

16 Q BY MS. JOHNSON: Ms. Endries, were you ever
17 involved with research and land documents and the title
18 that would be passed from Chevron Corporation or Chevron
19 Appalachia to other entities? Did you monitor that?

20 A No. 01:01

21 Q So this printout, if you look at the instrument
22 description, would you agree that it describes an
23 affidavit?

24 MS. CONDO: Object to the form of the question
25 for all my prior reasons including beyond the scope. 01:01

1 Go ahead. You can answer.

2 THE WITNESS: I don't recognize this document
3 at all. I don't know what it is.

4 Q BY MS. JOHNSON: Would you agree that on the
5 right-hand side Chevron Corp. is listed? 01:02

6 MS. CONDO: Object to the form of the question.
7 Same objections.

8 THE WITNESS: Yes.

9 Q BY MS. JOHNSON: In preparation for this
10 deposition, did you research or have anyone research the 01:02
11 LANDEX database for documents that Chevron Corporation
12 was listed and thereby potentially having an interest
13 in?

14 MS. CONDO: Object to the form of the question.
15 Same objections including beyond the scope. 01:02

16 Go ahead. You may answer.

17 THE WITNESS: I checked with Legal.

18 Q BY MS. JOHNSON: Did you check with any other
19 department?

20 A No. 01:02

21 Q I'm sorry?

22 A No.

23 Q Could you note the date of that document in the
24 upper left-hand corner?

25 MS. CONDO: Same objections. 01:03

1 Go ahead. You may answer.

2 THE WITNESS: July 22nd, 2015.

3 Q BY MS. JOHNSON: Thank you.

4 (Plaintiffs' Exhibit 11 was marked for identification.)

5 Q BY MS. JOHNSON: Now we're going to move to 01:03

6 Exhibit 11. Ms. Endries, are you familiar with the

7 PA Bulletin?

8 A No.

9 Q And did you or anyone from Chevron Corporation
10 search the PA Bulletin in preparation for today's 01:03

11 deposition?

12 MS. CONDO: Object to the form of the question
13 as beyond the scope.

14 Go ahead. You may answer.

15 THE WITNESS: No. 01:03

16 Q BY MS. JOHNSON: And do you see the entry, the
17 second full entry on this sheet?

18 MS. CONDO: Same objection including -- I'm not
19 sure about when you say "the second entry." Can you
20 identify which one you are referring to? But otherwise, 01:04
21 the same objections in addition. What second entry?

22 "Franklin Park Borough"? I mean, it's --

23 Q BY MS. JOHNSON: Ms. Endries, can you identify
24 whether or not Chevron Corporation is listed on this
25 document? 01:04

1 A Chevron Corporation is listed.

2 Q And what does it state here regarding Chevron
3 Corporation?

4 MS. CONDO: Same objections already interposed.

5 THE WITNESS: It doesn't say anything other 01:04

6 than Chevron Corporation, Chevron Office Building,

7 Cherrington Park, 600 Corporate Center. I can't read

8 the rest. Something about Pennsylvania 15108.

9 (Plaintiffs' Exhibit 13 was marked for identification.)

10 Q BY MS. JOHNSON: Okay. Let's go to Exhibit 13. 01:04

11 So what are you aware of with respect to the purchase of

12 Atlas Energy by Chevron Corporation? What is your

13 understanding of that transaction?

14 A My understanding is that a subsidiary of

15 Chevron Corporation purchased Atlas. 01:05

16 Q And did Chevron Corporation itself enter any --

17 into any agreements with Atlas?

18 A I believe there may have been a sales agreement

19 that Chevron Corporation and Atlas Energy and the

20 subsidiary entered into -- the Chevron subsidiary 01:05

21 entered into.

22 Q And do you know the reasons why Chevron

23 Corporation ended up having Chevron Appalachia sell its

24 assets in 2020?

25 A I do not. 01:06

1 Q I'm sorry?

2 A I do not know why.

3 Q Are you aware of whether or not there was a
4 period between the, let's say, the discussion of
5 entering into a transaction between Chevron and Atlas -- 01:06
6 was there a period in between when the deal was pending
7 that Atlas America was engaging in operations pursuant
8 to the terms of the agreement between Chevron and Atlas
9 Energy?

10 MS. CONDO: Object to the form of the question. 01:06

11 THE WITNESS: I'm not sure I understand your
12 question. Can you repeat the question.

13 MS. JOHNSON: I can definitely rephrase that
14 one.

15 Q BY MS. JOHNSON: So when Chevron Corporation 01:06
16 entered into an agreement with Atlas and the subsidiary,
17 that purchase wasn't completed that day; correct?

18 A Correct.

19 Q And so there was a period of time between when
20 they signed that agreement and when closing occurred; 01:07
21 correct?

22 A Yes.

23 Q And during that period of time, who was
24 operating the assets?

25 A Which assets? 01:07

1 Q The assets in Pennsylvania.

2 A The Atlas assets?

3 Q Yes.

4 A It would be Atlas.

5 Q Until the consummation of the sale; correct? 01:07

6 A Not necessarily. I believe Atlas had its own
7 subsidiary, it had their own operations. And those
8 subsidiaries would maintain their own operations
9 throughout.

10 Q Do you know if there were any terms in the 01:07
11 agreement between Chevron and Atlas with respect to any
12 obligations or responsibilities that Atlas had during
13 that time to operate their assets in accordance with
14 methods that Chevron Corporation approved?

15 MS. CONDO: Object to the form of the question. 01:08

16 THE WITNESS: I'm familiar with the exact terms
17 of the agreement, but I would understand that Chevron
18 Corporation would not purchase -- or Chevron subsidiary
19 would not purchase a company that didn't comply with
20 environmental and safety laws, like compliance. 01:08

21 Q BY MS. JOHNSON: Had you ever reviewed the
22 sales agreement between Chevron Corporation and Atlas
23 Energy?

24 MS. CONDO: Object to the form of the question.

25 THE WITNESS: Yes. 01:08

1 Q BY MS. JOHNSON: And do you know if a copy of
2 that agreement has been produced to plaintiffs?

3 A I don't.

4 Q And with respect to -- let's go back to what's
5 probably a duplicate, Exhibit 18 and Exhibit 19. Were 01:09
6 there documents that supported -- for example, the
7 services that would be provided for under this Counsel,
8 Service, and Support Agreement, Exhibit 19, the 2022
9 agreement, where is the documentation that describes the
10 services being provided? For example, if it's the 01:09
11 logistics, where's the supporting documentation that
12 directs Chevron Corporation and the signatory, how that
13 process works?

14 MS. CONDO: Object to the form of the question.
15 You can answer. 01:09

16 THE WITNESS: I don't know the answer to that.

17 Q BY MS. JOHNSON: So are there documents that
18 are related to this Counsel, Service, and Support
19 Agreement that you're aware of?

20 A That's a broad question. I don't know how to 01:10
21 narrow that. Are you talking between Chevron
22 Corporation and Chevron U.S.A., Inc.?

23 Q Yes. Yes.

24 A I don't really know. There could be. I don't
25 really know. 01:10

1 Q And what about for the 2021 agreement?

2 A I don't know.

3 Q So Exhibit 15.

4 (Plaintiffs' Exhibit 15 was marked for identification.)

5 Q BY MS. JOHNSON: Ms. Endries, are you aware of 01:10
6 the incident that happened in 2014? It's sometimes
7 referred to as the Lanco incident?

8 A I'm familiar.

9 Q And what is your understanding of that event?

10 A I have limited understanding. I read in the 01:11
11 news that there was an explosion, and that's about all I
12 know.

13 Q And was that ever reported to you at Chevron
14 Appalachia in your capacity as Secretary in governance?

15 A No. 01:11

16 Q And are you aware of any communications between
17 Chevron Corporation and Chevron Appalachia related to
18 the Lanco incident?

19 A No.

20 Q Are you aware of any communications between 01:11
21 Chevron Corporation and Chevron U.S.A., Inc., regarding
22 the Lanco incident?

23 A No.

24 Q Are you aware of any communications between
25 Chevron Corporation and any person or entity with 01:12

1 respect to the Lanco incident?

2 A I don't believe so. I know that Chevron
3 Appalachia had some announcements that I saw. So, you
4 know, they were in the news. So I'm assuming others saw
5 that too. 01:12

6 Q So here in this article -- it's Exhibit 15, and
7 you had said you read some of this information in the
8 news. This is an article from June 2nd, 2015. Can you
9 confirm whether it was Chevron Corporation that paid the
10 \$939,553 fine, or was that Chevron Appalachia who paid 01:12
11 that fine?

12 A It was not Chevron Corporation that paid that
13 fine.

14 Q Do you know who paid that fine?

15 A I do not know offhand, but this was not written 01:13
16 by Chevron Corporation. This was written by a news
17 organization.

18 Q Well, who did pay that fine?

19 A I'd have to look into that.

20 Q So it could have been Chevron Corporation? 01:13

21 MS. CONDO: Objection to the form of the
22 question.

23 THE WITNESS: It would not be Chevron
24 Corporation. Chevron Corporation does not have any
25 operations as a holding company. It doesn't do 01:13

1 business. It would not pay the fine of a subsidiary.

2 Q BY MS. JOHNSON: So in preparation for today's
3 deposition -- this was one of the topics -- what did you
4 do to prepare to answer questions about the Lanco
5 incident and Chevron Corporation's involvement in that 01:13
6 incident which resulted in the death of a man?

7 MS. CONDO: Object to the form of a question.

8 THE WITNESS: I read the interrogatories. I
9 spoke to controllers and treasury, tax -- actually, I
10 don't know if I talked to tax. Just controllers and 01:14
11 treasury. I looked at my governance database for any
12 evidence that Chevron Corporation had anything to do
13 with this incident.

14 Q BY MS. JOHNSON: And it was -- do you feel like
15 that was a thorough investigation that you did prior to 01:14
16 this deposition?

17 A Yes.

18 Q Do you know whether there are any other
19 resources that you should have checked in preparation
20 for this deposition? 01:14

21 MS. CONDO: Object to the form of the question.
22 Overly broad in regard to this deposition.

23 THE WITNESS: No.

24 Q BY MS. JOHNSON: So in your role as a corporate
25 designee, Chevron Corporation, what was its reaction 01:14

1 when a man was killed on one of its subsidiary's
2 properties? What was Chevron Corporation's reaction to
3 that?

4 MS. CONDO: Object to the form of the question.
5 It assumes that Chevron Corporation was involved and had 01:15
6 a reaction.

7 You can answer.

8 THE WITNESS: Chevron Corporation doesn't have
9 a reaction. Employees have a reaction. Employees are
10 always sad when there's an incident. But that's not -- 01:15
11 but Chevron Corporation had nothing to do with this.

12 Q BY MS. JOHNSON: So you were the corporate
13 designee. You speak for Chevron Corporation as part of
14 this deposition. Do you remember me asking you if you
15 understood that at the beginning? 01:15

16 A Yes.

17 MS. CONDO: As to the topics that are
18 appropriate for the deposition.

19 But go ahead.

20 Q BY MS. JOHNSON: What is Chevron 01:15
21 Corporation's -- what was Chevron Corporation's
22 response, written or otherwise, when it learned that a
23 worker had been killed on the Lanco wellsite?

24 MS. CONDO: Objection. Asked and answered.

25 You can tell her again. 01:16

1 THE WITNESS: Chevron Corporation didn't have
2 an answer or response. Chevron Corporation wasn't
3 involved in this incident. A subsidiary of Chevron
4 Corporation was. All communications went to that
5 subsidiary. 01:16

6 Q BY MS. JOHNSON: Do you know if that incident
7 involved any services that would have been provided for
8 under a shared services agreement?

9 A I don't believe so.

10 Q Did you check to see if there were any shared 01:16
11 service agreements related to the operations on the
12 Lanco pad?

13 A Chevron Corporation would not provide services
14 regarding any kind of oil and gas operation.

15 Q But Chevron Corporation would engage third 01:16
16 parties to provide those services for its subsidiaries
17 pursuant to the two agreements that we just looked at?

18 MS. CONDO: Objection. Asked and answered and
19 mischaracterizes the witness's prior testimony.

20 THE WITNESS: That's incorrect. Chevron 01:17
21 Corporation would not provide services. Chevron
22 Corporation could but didn't. Chevron Corporation did
23 not provide services for that operation.

24 Chevron Corporation provides corporate services
25 like treasury and governance and controllers. Chevron 01:17

1 Corporation doesn't have its own operation. It's a
2 holding company. It has no business of its own other
3 than investments.

4 Q BY MS. JOHNSON: So does Chevron Corporation
5 ever enter into agreements with third parties pursuant 01:17
6 to the 2022 agreement for, let's say, on-site
7 coordination on an oil and gas wellsite?

8 A No.

9 Q Has Chevron Corporation ever entered into a
10 service agreement with a third party to provide support 01:17
11 for any oil and gas operations by any of its
12 subsidiaries in Pennsylvania?

13 A No.

14 Q So is it your testimony that Chevron
15 Corporation provided no services, provided no 01:18
16 third-party contracts, and had no involvement in the
17 Lanco incident; is that correct?

18 A Correct.

19 Q And was there any change in policy after that
20 man had been killed on the wellsite? 01:18

21 MS. CONDO: Objection to the form of the
22 question. I'm sorry. I probably spoke over the end of
23 your question. Can you just repeat that again.

24 MS. JOHNSON: Yeah, sure.

25 Q BY MS. JOHNSON: Was there any change in policy 01:18

1 at Chevron Appalachia that occurred after the man was
2 killed on the Lanco wellsite?

3 MS. CONDO: Objection. Beyond the scope of the
4 corporate rep deposition notice.

5 You can answer. 01:19

6 THE WITNESS: I don't know the answer to that.

7 Q BY MS. JOHNSON: Do you know if there was any
8 change in policy at Chevron U.S.A., Inc., after that man
9 was killed on the wellsite?

10 MS. CONDO: Same objection. 01:19

11 THE WITNESS: I don't know the answer to that
12 question.

13 Q BY MS. JOHNSON: And with respect to Chevron
14 Corporation, did it have any change in its policies
15 after that man was killed on that wellsite?

16 A My understanding, no corporate policies were
17 changed.

18 Q I'm sorry?

19 A No corporate policies were changed after that
20 incident.

21 Q And what else are you aware of in that
22 incident? What details are you aware of?

23 MS. CONDO: Object to the form of the question.

24 Asked and answered.

25 Go ahead.

1 THE WITNESS: I am aware there was an explosion
2 and someone died. That's it.

3 Q BY MS. JOHNSON: And so upon learning that,
4 were there discussions at work about that that you
5 participated in?

6 MS. CONDO: Object to the form of the question.
7 Goes beyond the scope.

8 You can answer.

9 THE WITNESS: Not at the Chevron Corporation,
10 officer or employee.

11 Q BY MS. JOHNSON: Who did you speak to about the
12 incident at the Lanco wellsite?

13 MS. CONDO: Objection. Asked and answered.

14 You can go ahead and answer.

15 THE WITNESS: I don't believe I spoke to
16 anybody. I mean, it was a very long time ago, but I
17 don't believe I spoke to anybody. I'm saddened, but I
18 didn't talk to anybody about it.

19 Q BY MS. JOHNSON: So is there policy at Chevron
20 Corporation that if there is an event like the death of
21 a worker or a contamination event of a subsidiary, does
22 Chevron Corporation have policies in place that deal
23 with such situations such as the death on a wellsite or
24 a contamination event?

25 MS. CONDO: Object to the form of the question.

1 You can answer.

2 THE WITNESS: Chevron Corporation does not have
3 policies. The subsidiaries, the businesses would have
4 the policy.

5 Q BY MS. JOHNSON: And does Chevron Corporation
6 have to approve those policies?

7 A No.

8 Q So Chevron Appalachia could have its own
9 policies independent of the policies of Chevron
10 Corporation; is that right?

11 A Yes.

12 Q And Chevron U.S.A. could decide to have
13 whatever policies it desires; is that right?

14 A Yes.

15 Q So Chevron Corporation's policies for -- let's
16 say, for example, safety. Chevron Corporation's
17 policies don't apply to its subsidiaries. Is that what
18 you're testifying?

19 MS. CONDO: Object to the form of the question.

20 You can go ahead.

21 THE WITNESS: Not necessarily. But every
22 subsidiary is distinct and separate and runs its
23 business separately. It has its own board or managers.
24 It has its own officers. Chevron Corporation decides
25 which entities it wants to invest in. If Chevron

1 Corporation deems an entity not worthy of investing in,
2 if it doesn't have a safe environment, if it doesn't
3 have a good compliance program, then Chevron Corporation
4 may not invest in it anymore.

5 Chevron Corporation has policies of its own and
6 recommends that every subsidiary adopt those policies as
7 best practices but doesn't demand it. Chevron
8 Corporation would like Chevron Corporation's policies
9 adopted at a minimum, but some companies may have even
10 stricter standards than Chevron.

11 Q BY MS. JOHNSON: So you had mentioned that if
12 there's a company or a subsidiary that is having safety
13 issues or contamination issues -- and I don't want to
14 misconstrue your testimony -- that Chevron Corporation
15 will not invest in those companies; is that right?

16 MS. CONDO: Object to the form of the question.
17 It's absolutely not what she testified to.

18 But you can restate --

19 THE WITNESS: I did not. I didn't state that.
20 I just said Chevron Corporation can provide guidance to
21 its subsidiaries. It doesn't direct its subsidiaries.
22 If a subsidiary is going on its own path and not in the
23 path that Chevron Corporation deems acceptable, Chevron
24 Corporation can stop investing or the parent company of
25 that subsidiary can, you know, put new directors in.

1 Q BY MS. JOHNSON: I'm sorry. Go ahead.

2 Are you aware of any situations in which
3 Chevron Corporation stopped investing in a subsidiary
4 because of safety or other issues?

5 A I'm aware of a situation where Chevron
6 Corporation stopped investing and sold its interest,
7 yes.

8 Q And which situation was that?

9 MS. CONDO: Objection. Beyond the scope.
10 Go ahead.

11 THE WITNESS: I don't need to answer that.

12 Q BY MS. JOHNSON: I'm sorry?

13 A I can't talk to that. I'd have to go look.

14 Q I'm sorry. You can't or you won't? I'm not
15 understanding.

16 A I'd have to go look at the legal documents.

17 Q And are you aware of whether or not that's why
18 Chevron Corporation sold Chevron Appalachia, is because
19 of the safety issues and declining investment value?

20 MS. CONDO: Objection. Beyond the scope.
21 You can answer.

22 THE WITNESS: I'm not aware of the reasons why.

23 Q BY MS. JOHNSON: So why did Chevron Appalachia
24 sell off its assets?

25 MS. CONDO: Objection. Asked and answered.

1 She doesn't know.

2 THE WITNESS: So I don't believe Chevron
3 Appalachia sold its assets. I think Chevron Appalachia
4 was sold.

5 Q BY MS. JOHNSON: And who sold Chevron
6 Appalachia?

7 A Was it Chevron Northeast? I believe. I'd have
8 to look. It wasn't Chevron Corporation.

9 Q And did Chevron Corporation have any
10 participation in the sale from Chevron Appalachia to
11 EQT?

12 A No.

13 Q Did Chevron U.S.A. have any involvement in the
14 sale from Chevron Appalachia to EQT?

15 MS. CONDO: Beyond the scope. Objection.
16 But you can answer.

17 THE WITNESS: Yeah. I have to confirm whether
18 Chevron U.S.A., Inc., sold the company or if Chevron
19 Northeast sold the company to EQT. I'd have to look
20 that up.

21 Q BY MS. JOHNSON: So are you aware of the due
22 diligence that occurred during the sale of the assets
23 from Chevron Appalachia to EQT?

24 MS. CONDO: Objection. Beyond the scope.

25 THE WITNESS: I am not aware. I would not be a

1 part of that.

2 Q BY MS. JOHNSON: Now, would Chevron Corporation
3 ever be in receipt of due diligence reports from a
4 potential transaction?

5 MS. CONDO: Objection. Vague and overly broad.
6 You can answer.

7 THE WITNESS: I don't believe Chevron
8 Corporation would ever receive information other than
9 financial reporting.

10 Q BY MS. JOHNSON: Now, if there was a question,
11 say, for example, from the SEC about Chevron Appalachia,
12 who would answer that question to the SEC?

13 A I'm not sure there would be a question about
14 Chevron Appalachia by the SEC to Chevron. I don't
15 believe that there would be a question from Chevron
16 Appalachia by the SEC because Chevron Appalachia is not
17 a publicly-traded company, but Chevron Corporation is a
18 publicly-traded company. And the SEC would reach out to
19 Chevron Corporation as a publicly-traded company.

20 Q And so who would provide answers to the SEC
21 about an incident that happened involving Chevron
22 Appalachia?

23 MS. CONDO: Object to the form of the question.
24 Assumes that the SEC reached out to someone with a
25 question. But with that objection, if you can answer,

1 you can answer.

2 THE WITNESS: I don't know who would respond to
3 that. I don't know who would be that -- subject matter
4 expert in that.

5 MS. JOHNSON: All right. I am going to stop
6 sharing for a moment. And I'm going to find the
7 document that I need so I don't have to scroll through
8 this with all of you.

9 MS. CONDO: While you're doing that -- it can
10 be on or off the record. I don't care. But I know
11 we're in two different time zones, but it's 1:30 here.
12 At some point before too long -- we have some lunch here
13 so we don't need a long lunch break. But we're going to
14 need about 20 minutes to get some sustenance.

15 MS. JOHNSON: Okay. I'm fine breaking now if
16 you want to do that, and we can come back to this.
17 That's fine with me.

18 MS. CONDO: Okay. Why don't we go ahead and do
19 that. If it works for everyone else, why don't we try
20 to come back again -- we don't need to leave the
21 premises -- come back hopefully as close to -- Pacific
22 Time -- ten till 2:00 or so.

23 MS. JOHNSON: Take 30 minutes. 20 minutes is
24 way too short to eat. 30 minutes is fine.

25 MS. CONDO: Okay. So we'll come back at about

1 2:00 o'clock Pacific Time.

2 MS. JOHNSON: Okay. Great. Okay. Thank you.

3 THE VIDEOGRAPHER: This marks the end of media
4 number 2. The time is 1:29 p.m. We are off the record.

5 (A lunch break was taken from 1:29 p.m. to 2:04 p.m.)

6 THE VIDEOGRAPHER: This marks the beginning of
7 media number 3. The time is 2:04 p.m. We are back on
8 the record.

9 MS. JOHNSON: Thank you.

10 Q BY MS. JOHNSON: Ms. Endries, I just want to
11 follow back up on -- we had touched base on SEC
12 correspondence and SEC communications. So the exhibit
13 that I am going to be referring to is Exhibit 7. I'm
14 going to share my screen again.

15 (Plaintiffs' Exhibit 7 was marked for identification.)

16 Q BY MS. JOHNSON: Ms. Endries, this is a copy of
17 Plaintiffs' Response to Chevron Corporation's Response
18 to a Proposed Order in this matter. Have you ever seen
19 this document before?

20 A I have not.

21 Q And we were talking about SEC communications.
22 And this was filed with the court on September 21st of
23 2023. And in that filing, there is a -- do you
24 recognize what this is? Are you familiar with this
25 Schedule 14A?

1 A Yes.

2 Q Have you seen this before with respect to the
3 proxy statement that was filed by Chevron Corporation
4 here?

5 A I likely had. It's been a while.

6 Q So if we look down -- so if we go to Exhibit B
7 of -- it's Exhibit 7. Here's a letter that we located
8 on EDGAR, SEC's database that you can search. And this
9 letter was provided to your counsel, you know, roughly
10 2 1/2 months ago. Had this ever been provided to you?

11 A No.

12 Q I'll give you a minute if you want to take a
13 look at this letter.

14 MS. CONDO: I may have a hard copy. And if I
15 do, I'll give that to her. She can perhaps review it
16 more quickly, but let me see if I do. Can you scroll up
17 a little bit.

18 MS. JOHNSON: Oh, yeah. Sure. Is that good?

19 MS. CONDO: Here's a hard copy if that's easier
20 to read.

21 THE WITNESS: I can read it. Okay. Thank you.
22 Okay. Thank you. Is there more, or is that it?

23 MS. CONDO: It felt like it was going on
24 forever. Are you all done?

25 THE WITNESS: I don't have a, you know, great,

1 you know, photographic memory but....

2 Q BY MS. JOHNSON: Sure. Do you know who
3 Matthew J. Foehr is, F-o-e-h-r?

4 A Yes.

5 Q How do you know Matthew?

6 A Matt Foehr was our comptroller of Chevron
7 Corporation.

8 Q And how long was he comptroller of Chevron
9 Corp.?

10 A I don't have that information handy.

11 Q I'm sorry. Go ahead.

12 A At least six years because I remember him. I
13 started in 2005. So I remember Matt.

14 Q So I had asked you before if the SEC had ever
15 sent questions about Chevron Appalachia or its assets,
16 whether or not Chevron Corporation would respond to the
17 SEC. So would you agree that this letter is coming from
18 Chevron Corporation to the SEC regarding its
19 Pennsylvania assets?

20 A Yes. I mean, I believe so.

21 Q So if we look to -- and this touches on a lot
22 of the questions that I have, and I want to really focus
23 here and ask that you answer based on the Corporation's
24 knowledge.

25 As part of the purpose of this deposition is to

1 have -- identify what the company was aware of, and a
2 letter from Chevron Corporation obviously is something
3 that the corporation knows about. But is it your
4 testimony you had never seen this letter before today?

5 MS. CONDO: Object to the form of the question
6 with respect to what this deposition is about, trying to
7 figure out what Chevron Corporation knew. The
8 deposition is about the specific subjects that are
9 identified in the Notice of Deposition.

10 It was also either a compound question or a
11 question with a lot of preference, because at the end of
12 the day the only question was, Will she reaffirm that
13 she hasn't seen this letter before.

14 With that, you can answer that question.

15 THE WITNESS: I have not seen this letter
16 before.

17 Q BY MS. JOHNSON: And how much time did you
18 spend looking for correspondence between Chevron
19 Corporation and the SEC related to Pennsylvania assets?

20 MS. CONDO: Objection to the form of the
21 question. Presumes that that was a subject matter of
22 the corporate rep Notice of Deposition.

23 Go ahead.

24 THE WITNESS: I did not look at SEC -- that
25 correspondence.

1 Q BY MS. JOHNSON: And would you agree that
2 there's no distinction made in this document that
3 Chevron is discussing the assets that were purchased
4 from Atlas Energy as if they were Chevron Corporation
5 assets?

6 MS. CONDO: Object to the form of the question.
7 Vague and ambiguous and unintelligible.

8 THE WITNESS: I actually disagree. "Chevron
9 Corporation" is mentioned several times in this
10 document, and then "Chevron" alone is mentioned. And in
11 our SEC filings, you'll see a cautionary statement at
12 the bottom that says any reference to Chevron could mean
13 Chevron Corporation or any of its subsidiaries or
14 affiliates. I believe that's what's happening here.

15 If you look at the top at Chevron Corporation,
16 if you look through it, you'll see Chevron Corporation a
17 couple times.

18 Q BY MS. JOHNSON: But you're not sure because
19 you hadn't seen this before; correct?

20 MS. CONDO: Object to the form of the question.
21 You can answer.

22 THE WITNESS: I'm just looking at it now. It's
23 apparent to me.

24 Q BY MS. JOHNSON: So with respect to the
25 statement here with "On June 28, 2011, Chevron also

1 acquired an additional 228,000 net acres in
2 Pennsylvania, West Virginia, and Maryland from Chief Oil
3 & Gas in Tug Hill." Are you aware of that transaction?

4 A No.

5 Q Did you look for any other transactions that
6 Chevron Corporation may have instigated or been involved
7 with in Pennsylvania from 2011 through present?

8 MS. CONDO: Object to the form of the question
9 to the extent that it's construing the use of "Chevron"
10 here to be Chevron Corporation.

11 THE WITNESS: I looked for Chevron Corporation
12 in Pennsylvania. I do understand that Atlas and Chevron
13 Appalachia had operations in Pennsylvania. I only
14 looked for Chevron Corporation.

15 Q BY MS. JOHNSON: But the corporation would have
16 known about other transactions -- correct? -- even if
17 you didn't personally?

18 MS. CONDO: Object to the form of the question.
19 Beyond the scope. The scope doesn't relate to interests
20 of companies other than Chevron Corporation in
21 Pennsylvania.

22 Go ahead.

23 THE WITNESS: The corporation is a holding
24 company. So it holds an interest in many companies.
25 And part of its investment, it may or may not know of

1 business activities and locations, depending on the
2 size. And Chevron Corporation would have to report its
3 financials through consolidation of financial statements
4 up to the SEC through its 10-K. And that's why you
5 would see -- you know, mention of operations in
6 Pennsylvania or elsewhere is because Chevron Corporation
7 is reporting its consolidated financials and its
8 operations through its subsidiaries.

9 Q BY MS. JOHNSON: Did you review those
10 consolidated financials in preparation for this
11 deposition today?

12 A No.

13 Q So if you look at this paragraph here, it talks
14 about the fact that Chevron Corporation reviewed their
15 records for incident citations or suits involving a
16 known spill or release related to hydraulic fracturing
17 operations and shale gas properties held by Chevron in
18 the United States.

19 So do you believe that this search, then, would
20 encompass just Chevron Corporation, or is the use of
21 just "Chevron" also meaning it's one of its many
22 subsidiaries? Who is it referring to here, do you
23 think, in this paragraph?

24 A I believe the use of "Chevron" -- it could be
25 Chevron Corporation or any of its subsidiaries or

1 affiliates.

2 Q So in here in the middle of this paragraph it
3 states that "Chevron has received several notices under
4 state law and is in the process of investigating each of
5 them." Are you aware of the notices that Chevron
6 Corporation received under state law and that it was
7 investigating?

8 MS. CONDO: Object to the form of the question.
9 Assumes without foundation, without asking the witness
10 that this is Chevron Corporation that has received
11 several notices.

12 Go ahead. You can answer.

13 THE WITNESS: I'm sorry. Can you repeat the
14 question.

15 Q BY MS. JOHNSON: Does Chevron Corporation --
16 did it -- sorry.

17 Did you review Chevron Corporation records to
18 identify and locate notices under state law of pollution
19 or diminution of water supplies in Pennsylvania?

20 A I did not. I relied on legal counsel.

21 Q And so your testimony here today, with respect
22 to topics that you stated you only had personal
23 knowledge -- is this one of those situations where
24 you're merely testifying about your personal knowledge
25 and not the knowledge of the corporation?

1 MS. CONDO: Object to the form of the question.
2 That's not what she said.

3 THE WITNESS: I think the interrog I signed
4 said I relied on others for this knowledge.

5 Q BY MS. JOHNSON: And who did you rely on for
6 this type of knowledge about notices of complaints and
7 concerns about pollution and diminution?

8 A Legal.

9 Q And in the next section, you can see it talks
10 about -- and it's addressed to Chevron Corporation, what
11 steps you've taken to minimize any potential
12 environmental impact. And if you see the response, it
13 goes through and it talks in this section about Chevron
14 and industry best practices. "Chevron believes
15 effective wellbore construction and casing design,"
16 et cetera, et cetera. So these industry best practices,
17 what's your familiarity with industry best practices?

18 MS. CONDO: Objection. Beyond the scope.

19 Go ahead. You can answer.

20 THE WITNESS: I don't have any knowledge of
21 industry best practices on this topic.

22 Q BY MS. JOHNSON: Does Chevron Corporation have
23 knowledge of industry best practices?

24 MS. CONDO: Beyond the scope. Objection.

25 Go ahead.

1 THE WITNESS: No.

2 Q BY MS. JOHNSON: And -- so in this section it
3 talks about "Fracturing fluid additives are evaluated
4 and minimized for every project." And then it goes on
5 to talk about "works closely with our service providers
6 to evaluate the effectiveness of additives."

7 Do these service providers -- is it the
8 Corporation's intent -- are they referring to these
9 service providers to the same individuals or entities
10 that would provide services under one of the shared
11 services agreements?

12 MS. CONDO: Objection. Unintelligible. And
13 when you say "the corporation," the question doesn't
14 indicate what corporation you're asking about.

15 THE WITNESS: No.

16 Q BY MS. JOHNSON: And who do you think they're
17 referring to here? Who is Chevron Corporation referring
18 to with "working closely with our service providers"?
19 Who do you think they're referring to?

20 A One of our subsidiaries who does fracking. I
21 don't know. Honestly, it would be speculation. But it
22 would be a subsidiary.

23 Q So, for example, in some of those shared
24 services agreements, it wouldn't be a subsidiary
25 providing, say, wastewater testing; correct? There

1 could be a service provider, a third party, who comes
2 and tests the wastewater; is that right?

3 MS. CONDO: Objection to the form of the
4 question to the extent that you are now trying to morph,
5 if you will, this statement into the service agreement.
6 It's not clear what you're asking about.

7 THE WITNESS: Will you repeat the question. I
8 don't understand the question.

9 Q BY MS. JOHNSON: That's fine. So these shared
10 services agreements, one of your subsidiaries -- let's
11 take Chevron Appalachia; right? So you're saying that a
12 subsidiary could be the service provider in this
13 situation. Is that what you meant?

14 A No. I'm saying Chevron Corporation has nothing
15 to do with this, you know, providing any of these
16 services. And a subsidiary would be responsible for
17 these services. If a subsidiary decided to get a third
18 party, that would be up to the subsidiary. But Chevron
19 Corporation would have nothing to do with that.

20 Q And if you look at the next section, it talks
21 about Chevron Corporation describes itself as a global
22 company. Chevron has a proprietary process for treating
23 flowback and produced water. Are you aware of this
24 proprietary process that Chevron has?

25 A No.

1 Q So Chevron Corporation would know about this
2 proprietary process, though; correct?

3 MS. CONDO: Object to the form of the question.

4 THE WITNESS: I don't know if this has been
5 reported to Chevron Corporation by a subsidiary. If
6 it's proprietary, maybe -- I don't know for a fact.

7 Q BY MS. JOHNSON: Well, Chevron Corporation
8 wrote this letter. This letter is from Matt saying that
9 Chevron has a proprietary process. Well, is that
10 Chevron Corp.'s process that it then requires its
11 subsidiaries to use?

12 A No. It would be the subsidiary proprietary
13 process. Chevron Corporation is a holding company. It
14 just invests in, you know, investments, subsidiaries.
15 And so the subsidiaries and affiliates actually do the
16 business. They have their own assets, and they have
17 their own system like a subsidiary proprietary process.

18 Q So speaking of investments, I believe your
19 testimony earlier is that the board visited in 2015 to
20 see one of its assets -- investments -- I'm sorry. Is
21 that correct?

22 A Yes.

23 Q What other investments did Chevron Corporation
24 have in Pennsylvania at the time?

25 A I'm not certain in 2015 what Chevron

1 Corporation had -- Chevron -- a subsidiary, had in
2 Pennsylvania. I just don't know.

3 Q And what resources did you refer to in order to
4 search for these examples?

5 MS. CONDO: Object to the form of the question.
6 "These examples." Examples of what? I have no idea
7 what we're talking about at this point.

8 THE WITNESS: Can you repeat the question.

9 MS. JOHNSON: Yeah, sure.

10 Q BY MS. JOHNSON: So the examples that we're
11 talking about with respect to Chevron Corporation's
12 investments in Pennsylvania, for your preparation for
13 this deposition -- the focus of which, what contacts
14 does Chevron Corporation have with Pennsylvania -- what
15 resources did you rely on to search for all of those
16 contacts with Pennsylvania?

17 A Legal and controllers. Controllers would keep
18 track of assets. And I did research my governance site.

19 Q And how long collectively did it take you to
20 prepare for this deposition? I think you had testified
21 previously it was seven hours; is that right?

22 A I'm guessing seven. I did some research. I
23 had some phone calls with controllers and treasury,
24 yeah.

25 Q Who did you speak to in the Controllers

1 Department?

2 A Controllers Department, I believe Steve
3 Turnbow, T-u-r-n-b-o-w. And then Treasury, Matt Murin,
4 M-a-t-t, Murin, M-u-r-i-n; Wayne, W-a-y-n-e, Borduin,
5 B-o-r-d-u-i-n.

6 Q Ms. Endries, here it states, "The company
7 maintains a broad insurance program covering its
8 worldwide operations." Do you know if Chevron
9 Corporation, this broad insurance program, does this
10 cover all of its subsidiaries in one policy?

11 A No.

12 Q Then how do you know that?

13 A I know that there are some areas -- some
14 countries where you would need your own insurance.

15 Q And what countries are those?

16 A Brazil, India.

17 Q And what about in the United States? What is
18 your familiarity with Chevron Corporation's broad
19 insurance program?

20 A I don't have a lot of familiarity with the
21 broad insurance program.

22 Q As part of your preparation for this
23 deposition, you didn't review any of the potential
24 shared insurance policies; is that correct?

25 MS. CONDO: Objection. Beyond the scope.

1 Go ahead.

2 THE WITNESS: I did not.

3 Q BY MS. JOHNSON: And the next paragraph it
4 states, "The company is party to many thousands of
5 contractual relationships with contractors, suppliers,
6 customers, and partners with a variety of indemnity
7 provisions."

8 So would you agree that the way this reads, the
9 company, which Chevron Corporation is writing this
10 letter, is party to many thousands of contractual
11 relationships? What does that mean to you? What is
12 your understanding of that?

13 MS. CONDO: Objection to the form of the
14 question to the extent you are characterizing "the
15 company" as being Chevron Corporation without asking the
16 witness.

17 THE WITNESS: To me, "the company" means, you
18 know, Chevron Corporation or any of its subsidiaries or
19 affiliates.

20 Q BY MS. JOHNSON: So what are the contractual
21 relationships that Chevron Corporation or Chevron U.S.A.
22 has with any entities in Pennsylvania with respect to
23 contractors, suppliers, customers, and partners?

24 MS. CONDO: Objection. Compound to the extent
25 you're asking about Chevron U.S.A.'s contracts. Clearly

1 beyond the scope.

2 THE WITNESS: Chevron Corporation does not have
3 any contracts in Pennsylvania at all. I'm not familiar
4 with any other subsidiaries' contracts.

5 Q BY MS. JOHNSON: So does Chevron Corporation
6 have any contracts or arrangements with any Pennsylvania
7 entities?

8 MS. CONDO: Object to the form of the question,
9 "or arrangements."

10 MS. JOHNSON: Loans, for instance.

11 MS. CONDO: Same objection.

12 THE WITNESS: Chevron Corporation, are we
13 talking investors? Is that what you're asking?

14 Q BY MS. JOHNSON: Any agreements or business
15 dealings with any Pennsylvania entities.

16 MS. CONDO: Same objection.

17 THE WITNESS: I'm not privy to that
18 information. I wouldn't know that.

19 Q BY MS. JOHNSON: So with respect to Chevron
20 Corporation, its contracts and business dealings with
21 Pennsylvania entities, is it your testimony you have not
22 researched that for this deposition?

23 A No, that's not my testimony. My testimony is I
24 am not aware of every contract in Pennsylvania. For
25 instance, if there's an investor, an investor invests

1 with, you know, Chevron Corporation issuing an
2 indenture. With Chevron Corporation issuing an
3 indenture, I would not know of that investor.

4 Q Well, you signed a Power of Attorney on that
5 particular --

6 A Not for the investor. I would not know which
7 investors took, you know, the indenture. I would not
8 know that.

9 Q Chevron U.S.A., Inc., is a Pennsylvania entity;
10 correct?

11 A Yes.

12 Q So Chevron Corporation has entered into various
13 loan agreements, indentures, guarantees with Chevron
14 U.S.A., Inc.; correct?

15 A I don't believe that -- I think the guarantee
16 is not necessarily an agreement with Chevron U.S.A.,
17 Inc. I think Chevron Corporation is guaranteeing
18 Chevron U.S.A., Inc.'s debt when a third-party investor
19 invests in the Chevron U.S.A., Inc., indenture. Or if
20 there is an agreement between Chevron U.S.A., Inc., and
21 a third party and the third party demands a parent
22 company guarantee, it could be Chevron Corporation
23 guaranteeing the debt for that third party.

24 Q So this paragraph here, where would these many
25 thousands of contracts be housed inside Chevron

1 Corporation?

2 MS. CONDO: Objection. Asked and answered.
3 She's testified that she does not interpret that to mean
4 Chevron Corporation's contracts.

5 You can answer again.

6 THE WITNESS: Chevron Corporation keeps track
7 of its own contracts through its various departments,
8 and then other subsidiaries will keep track of their own
9 contracts separately.

10 Q BY MS. JOHNSON: So how much time did you spend
11 researching the files that Chevron Corporation keeps
12 separately of its own contracts?

13 MS. CONDO: Object to the form of the question.
14 You mean with a Pennsylvania entity, which is what the
15 scope of the subject was.

16 THE WITNESS: I cannot speculate on the amount
17 of time. There is no one location -- there's not one
18 file database where all contracts are kept for Chevron
19 Corporation. So I had to reach out to controllers.
20 They have their own file system. Treasury has their own
21 file system. Legal has their own file system.
22 Government has its own file system. So I reached out to
23 those.

24 Q BY MS. JOHNSON: So why do you think you
25 weren't provided with a copy of this?

1 MS. CONDO: Objection to the form of the
2 question. By definition this isn't a contract. You
3 know, we're way beyond the scope here, and now you're
4 asking her to speculate about why her lawyer didn't
5 provide her with a document that isn't a contract. I
6 mean, I object to her speculating about why her lawyer
7 didn't send her something that you attached to a legal
8 brief.

9 Q BY MS. JOHNSON: I'm still waiting for an
10 answer to my question.

11 MS. CONDO: And I objected to it.

12 If you can speculate about why I did or didn't
13 do something, that's not proper. If you know why I did
14 or didn't do something other than through a privileged
15 conversation, you can tell her. If you know something
16 from a privileged conversation, I would instruct you not
17 to answer.

18 THE WITNESS: I don't know anything. I don't
19 speculate on this.

20 Q BY MS. JOHNSON: So in preparing for this
21 deposition, did your lawyer just give you everything, or
22 did you do your own due diligence?

23 A I received the interrogs that I signed, and I
24 just went through the interrogs to confirm the
25 responses. My scope was limited to the interrogs and

1 the answers. That's what I'm responding to.

2 Q BY MS. JOHNSON: So I may have asked this
3 before, and I apologize. Did you read a copy of the
4 Discovery Order where the judge issued an order
5 regarding discovery and a corporate designee deposition?

6 MS. CONDO: Objection. Asked and answered.
7 She said she did not. And there's one paragraph of that
8 Discovery Order addressing the corporate rep deposition
9 that just gives the date by which it needs to be taken.

10 MS. JOHNSON: Right. I'm just trying to
11 understand the actual preparation that went into
12 preparing for this deposition --

13 (Overlapping speakers)

14 MS. CONDO: -- questions about that.

15 Q BY MS. JOHNSON: So moving on to remediation
16 plans or procedures. So here it talks about Chevron's
17 plans and procedures in the event of a, you know,
18 pollution or other event. And if we scroll down to --
19 it states here that there are trained spill responders
20 and oil spill response organizations under contract. Do
21 you know who those organizations are that pertain to
22 operations in Pennsylvania?

23 I'm sorry?

24 A No, I do not.

25 Q And here it talks about in the unlikely event

1 that a major spill or leak occurs, Chevron maintains a
2 Worldwide Emergency Response Team. What is this
3 Worldwide Emergency Response Team?

4 MS. CONDO: Beyond the scope. Objection.
5 Go ahead.

6 THE WITNESS: I don't know what that is.
7 Chevron Corporation doesn't maintain it. I'm not
8 certain if that term is, you know, relevant.

9 Q BY MS. JOHNSON: It says Chevron maintains it,
10 and it's a team comprised of approximately 200 employees
11 who are trained and available at all times to support a
12 major incident.

13 Is there a Worldwide Emergency Response Team
14 now within Chevron Corporation?

15 A -- Worldwide Emergency Response Team at Chevron
16 Corporation when this letter was written.

17 Q There was?

18 MS. CONDO: Objection. She said "was not."
19 Court reporter, can you read her answer back,
20 please.

21 MS. JOHNSON: Yeah. It's hard to hear her.

22 MS. CONDO: Yeah. I don't know why. We'll get
23 the microphone closer. But I would ask the court
24 reporter to read back so we're clear what the record
25 says, that last answer.

1 (Requested portion read.)

2 MS. CONDO: Then the court reporter didn't get
3 the whole answer. I would just ask for confirmation
4 from the court reporter in the future if there's words
5 you're not getting, would you please speak up so she can
6 tell them.

7 I'm not sure what's wrong. I'm having trouble
8 hearing the court reporter as well. So there must be
9 something wrong in the transmission.

10 For the record, since I don't think the court
11 reporter got the whole answer, can you repeat that
12 answer.

13 THE WITNESS: I don't think she was responding
14 to my --

15 THE COURT REPORTER: I'm sorry. "I don't think
16 she was responding to my" --

17 THE WITNESS: Can you hear me?

18 THE COURT REPORTER: It's better now.

19 THE WITNESS: I forgot the question. Can you
20 repeat your question.

21 MS. JOHNSON: I think I did too, Ms. Endries.

22 Q BY MS. JOHNSON: Is there a Worldwide Emergency
23 Response Team right now at Chevron Corporation?

24 A There is not a team called Worldwide Emergency
25 Response Team, to my knowledge, in Chevron Corporation

1 at all or in any subsidiary. I think the term is not
2 used anymore.

3 Q So, you know, being that this letter is from
4 Chevron Corporation to the SEC, at the time when I think
5 you were employed -- this letter was written in 2011 --
6 had you ever heard of the use of an Emergency Response
7 Team in any capacity through Chevron Corporation?

8 A No.

9 Q And so what was the response of Chevron
10 Appalachia to the Lanco incident? Was there a response
11 team that responded to that, similar to what's being
12 described here?

13 MS. CONDO: Objection. Beyond the scope.

14 THE WITNESS: I'm not familiar with what
15 Chevron Appalachia did other than what I read in the
16 document and the news articles you found.

17 Q BY MS. JOHNSON: So does Chevron -- would the
18 corporation have a better idea of what Chevron
19 Appalachia did during that Lanco incident?

20 MS. CONDO: Objection. Asked and answered.
21 She testified before about that or lack thereof.

22 Go ahead.

23 THE WITNESS: Yeah. So I'm speaking on behalf
24 of Chevron Corporation. Chevron Corporation does not
25 have an Emergency Response Team.

1 MS. CONDO: I think she's now asking you about
2 the Lanco incident.

3 Can you repeat the question, Lisa, because I
4 think she was just answering a different question.

5 MS. JOHNSON: No. I think that, you know, I'm
6 going to move on with all the testimony that was just
7 given.

8 MS. CONDO: I'm just going to indicate that the
9 Lanco testimony was previously given and asked and
10 answered. So the record will speak for itself on that.

11 But I think we may be having a transmission
12 issue, and I would just ask everyone if you are having
13 any trouble hearing the witness, please speak up so
14 we're sure we have a clear record.

15 Q BY MS. JOHNSON: Ms. Endries, the next document
16 that I have on the screen here is another document that
17 was provided to your counsel on September 21st, 2023.
18 Have you ever seen this document?

19 A No.

20 Q So I'll give you a minute to -- this is another
21 document we found on EDGAR. And I'm going to go back
22 down. It's from Mr. -- how do you say his last name
23 again?

24 A Foehr.

25 Q -- in response to a question from the SEC. And

1 I'll just give you a minute to take a look at that.

2 MS. CONDO: Is this also part of Exhibit 7,
3 Lisa, or are you marking this separately?

4 MS. JOHNSON: No. That's part of Exhibit 7.

5 THE WITNESS: You can move up. Can you move
6 up. Move up. Move up.

7 Q BY MS. JOHNSON: So, Ms. Endries, I'm going to
8 go to -- in the response here -- the response is from
9 Chevron Corporation, and here it talks about the
10 locations of their E&P activities. Would you agree that
11 this paragraph includes properties located across the
12 country and in different countries?

13 MS. CONDO: Object to the form of the question
14 to the extent that you are characterizing or potentially
15 mischaracterizing the company to be Chevron Corporation.

16 Go ahead. You can answer.

17 THE WITNESS: Chevron Corporation doesn't have
18 this operation. But yes, subsidiaries do have
19 operations in these states and countries.

20 Q BY MS. JOHNSON: So Chevron Corporation wrote
21 this letter, and you're here as a designee of the
22 corporation. So when the corporation, Chevron
23 Corporation, wrote this letter to the SEC describing its
24 operations, it doesn't refer to subsidiaries, does it?

25 A No. But there'd be -- -- but there'd be a

1 statement in the 10-K if there's any reference to
2 "Chevron" or "company" as opposed to any chemical
3 corporation or any of its subsidiaries.

4 In addition, Chevron Corporation, as a holding
5 company, as a publicly-traded company, has consolidated
6 financials. And so every operation somehow is captured
7 and moved up into Chevron Corporation's financials. And
8 Chevron Corporation has a duty to disclose these
9 investments and these operations --

10 (Discussion off the record.)

11 Q BY MS. JOHNSON: So the first paragraph here,
12 it seems as though -- and would you agree that Chevron
13 Corporation is referring to all of the operations by its
14 subsidiaries collectively in this paragraph? Would you
15 agree?

16 A Yes.

17 Q Is that what you said?

18 A Yes.

19 Q And one of the statements that is made in the
20 company's 10-Ks is the statement that "The company's
21 operations have inherent risks and hazards that require
22 significant and continuous oversight." What does that
23 mean?

24 A It means there are procedures in place by the
25 boards of each company and the executives of each

1 company for these operations.

2 Q What are inherent risks and hazards?

3 MS. CONDO: Lisa, she hadn't finished her
4 answer yet.

5 MS. JOHNSON: I apologize.

6 THE WITNESS: Also that likely Chevron
7 Corporation would want to know about these risks and
8 what mitigations are being taken for their investments.
9 We have a Compliance Department with an Audit Department
10 that would do that. Go ahead. I'm done.

11 Q BY MS. JOHNSON: So when you were dealing with
12 assets in Pennsylvania with Chevron Appalachia, did you
13 ever see that process take place where Chevron
14 Corporation was alerted to something and they responded
15 to it? Do you have any recollection of that happening
16 in Pennsylvania?

17 MS. CONDO: Object to the form of the question
18 to the extent that you're characterizing her testimony
19 as saying that that happened generally.

20 But go ahead.

21 THE WITNESS: I did not see anything like that.

22 Q BY MS. JOHNSON: And so the next statement
23 "Chevron's business subjects the company to liability
24 risks from litigation or government action." So it
25 talks about "Chevron's business." So what is Chevron

1 Corporation stating its business is subjecting it to
2 such liability? What does that mean?

3 MS. CONDO: Objection to the extent that your
4 question assumes that "Chevron's business" refers to
5 Chevron Corporation's business.

6 Go ahead.

7 THE WITNESS: I don't believe the statement
8 refers to Chevron Corporation. I think it refers to a
9 subsidiary's operation, any subsidiary. I don't believe
10 this is Chevron Corporation.

11 Q BY MS. JOHNSON: So the last two letters that
12 we looked at, one from 2011, one from 2014, you
13 recognize the signatory, these are Chevron Corporation
14 documents that a Chevron Corporation designee should
15 know the meaning of. These are important concepts.

16 So with respect to political instability and
17 significant changes in the regulatory environment could
18 harm Chevron's business, what does that mean?

19 MS. CONDO: Objection. Beyond the scope. She
20 can answer what she knows.

21 THE WITNESS: I think every operation looks
22 into what kind of risks there are. And political
23 instability -- I mean we're talking about countries that
24 can be very unstable. And then if a subsidiary goes
25 into that country, it has to be aware of political

1 instability.

2 Q BY MS. JOHNSON: So what was Chevron
3 Corporation's view on the risks and hazards that
4 Pennsylvania operations could pose to their overall
5 operations?

6 MS. CONDO: Objection. Beyond the scope.
7 You can answer.

8 THE WITNESS: I didn't research that. I didn't
9 see any communication about that.

10 Q BY MS. JOHNSON: I'm going back to the
11 indenture. This is the document that your counsel
12 produced in discovery. This is Chevron_Latkanich Bates
13 Number 0013306.

14 (Overlapping speakers)

15 Q -- the top of the page here.

16 MS. CONDO: I was asking, before you ask
17 questions about it, whether this has been marked as an
18 exhibit because I believe it has, and if we could
19 reference the exhibit number.

20 Q BY MS. JOHNSON: Okay. Exhibit 20. Let's go
21 back to the page in question. Okay.

22 Ms. Endries, did you read the Second
23 Supplemental Indenture that's depicted here, the
24 Exhibit 4.1, this page?

25 A Yes.

1 Q I'm sorry? You have read this?

2 A Yes.

3 MS. CONDO: I don't know what's going on. She
4 said "yes" three times. So there's some issue.

5 THE WITNESS: I'm really sorry. We did get
6 I.T. --

7 MS. JOHNSON: That's a lot better.

8 MS. CONDO: She's going to hold the microphone
9 up to her face.

10 MS. JOHNSON: Hopefully we're not going to be
11 here too much longer.

12 Q BY MS. JOHNSON: So Section 1.01, the amounts
13 of the notes that Chevron Corporation is guaranteeing,
14 would you agree that these amounts are current amounts
15 that the guarantee is subject to?

16 A Yes.

17 Q And what are these amounts for the 2023 notes?

18 A \$90,458,000.

19 Q And what about the 2024 notes?

20 A \$625,047,000.

21 Q And the 2027 notes?

22 A \$234,454,000.

23 Q And the 2028 notes?

24 A \$598,451,000.

25 Q And the 2029 notes?

1 A \$499,368,000.

2 Q And the 2041 notes?

3 A \$838,859,000.

4 Q And the 2043 notes?

5 A \$996,223,000.

6 Q The 2044 notes?

7 A \$844,712,000.

8 Q And the 2047 notes?

9 A \$495,355,000.

10 Q And the 2049 notes.

11 A \$474,340,000.

12 Q Do you know what the total of those amounts
13 are?

14 A No.

15 Q Is this the only outstanding indenture between
16 Chevron U.S.A., Chevron Corporation, and Deutsche Bank
17 Trust?

18 A Along with the first indenture, I believe so.
19 I haven't seen a third.

20 Q And does Chevron Corporation guarantee any
21 other loans for its Pennsylvania subsidiaries?

22 A I don't have an answer to that. It would not
23 come through me necessarily. So I might not see.

24 Q So you had mentioned that each company has its
25 own operating agreement, bylaws, governing documents; is

1 that right?

2 A Yes.

3 Q Do you know whether those have been produced to
4 plaintiffs?

5 MS. CONDO: Objection. Beyond the scope.

6 THE WITNESS: No, I don't know if they have
7 been produced.

8 MS. JOHNSON: They have not, and we will
9 request copies. Let's see here.

10 Q BY MS. JOHNSON: So as the corporate designee,
11 it's curious as to why you don't know some of these
12 things. Do you think that was a function of the limited
13 preparation? What is your impression of why some of
14 these things weren't included in your due diligence to
15 prepare for this?

16 MS. CONDO: Objection to the form of the
17 question. As you know, I have made multiple objections
18 that many of the things you are asking for and asking
19 about are beyond the scope of the subject matter of the
20 corporate designee notice. And so if you have questions
21 about that, not during this deposition, they would be
22 addressed to me, to counsel, not to a corporate designee
23 who was told through the deposition notice what the
24 topics were and investigated accordingly.

25 Q BY MS. JOHNSON: You can go ahead and answer

1 the question.

2 A I only researched what was in the interrogs.

3 Q Okay. So if we go to the topics -- and we're
4 going to spin through them fairly quickly. We've
5 touched upon some of these before. And to the extent
6 I'm repeating myself, I apologize. I will try to
7 refrain from doing that.

8 So topic 1 dealt with the identification and
9 nature of all litigation, including administrative
10 actions, in which a Pennsylvania or Federal court
11 tribunal exercised personal jurisdiction over Chevron
12 Corporation or any agent.

13 And what did you prepare in response to this
14 topic?

15 MS. CONDO: You can refer to the answers to
16 interrogatories, which I think are identical to these.
17 This is subject number 1 in the deposition notice.

18 THE WITNESS: Oh. Well, I checked with Legal
19 on this, and I believe Exhibit A was provided to you
20 with a chart listing the litigation.

21 Q BY MS. JOHNSON: So how many lawsuits did you
22 list on Exhibit A?

23 A 12.

24 Q What research did you do in preparation as a
25 corporate designee into those matters?

1 A I didn't do any research in the matters. That
2 was not the request. The request was to list all the
3 litigation in Pennsylvania.

4 Q And where did you or where did you direct
5 searches to be performed in order to identify this
6 litigation?

7 A Legal.

8 Q And so the Exhibit A that you referred to to
9 the responses, is that Chevron Corporation's testimony
10 that that is the only litigation including
11 administrative actions that relate to Item Number 1?

12 MS. CONDO: With respect to the time period
13 that was put in place by the judge. I think we need to
14 include that, which was 2011 forward.

15 THE WITNESS: Yes. It says since 2011, that's
16 correct.

17 Q BY MS. JOHNSON: And there are no other actions
18 that should be listed on there?

19 A Not to my knowledge.

20 Q And we've discussed topic Item 2, the
21 organizational chart of the Chevron defendants and the
22 Chevron subsidiaries. And that production of that chart
23 that we went through -- do you remember that chart? And
24 we were like, Well, if we take Chevron Appalachia off
25 the bottom, it will depict what the actual organization

1 chart is? Do you remember that?

2 A Yes. Chevron Northeast should be removed as
3 well. That was a holding company that was also sold.

4 Q Do you know if that was a Pennsylvania entity?

5 A It was not.

6 Q And so is it Chevron Corporation's testimony
7 here today that the organizational chart that was
8 provided is completely responsive to that request?

9 MS. CONDO: And I would just at this point
10 interpose an objection with respect to -- I think the
11 Discovery Order indicated the terms of the
12 organizational chart, and we included officers and
13 directors because of a footnote. It wasn't clear that
14 that was to be included. But we included it
15 nonetheless.

16 THE WITNESS: This is a correct organizational
17 chart. If we remove Northeast Upstream, LLC, and
18 Chevron Appalachia, LLC, it's a correct organizational
19 chart from Chevron U.S.A., Inc., all the way up to
20 Chevron Corporation.

21 Q BY MS. JOHNSON: So when Ms. Condo was talking,
22 she said "when we." "We included this." So was it
23 Legal doing this work and giving you this information
24 versus you doing an independent search?

25 A Yeah. This was done by one of my direct

1 reports.

2 Q And who was that?

3 A Scott Banks.

4 Q Scott Banks did the organizational chart?

5 A He prepared them. I don't know how to prepare
6 these charts. So he did them.

7 Q Moving on to topic 3. The identification and
8 nature of visits to locations to Pennsylvania since 2011
9 by Chevron and/or any agent. Now, let's talk about the
10 use of the term "agent." That is any person, which
11 would mean a company, individual who was acting on
12 behalf of Chevron Corporation. Do you understand that?

13 A Yes.

14 Q So who were Chevron's -- I would say the top
15 three agents that they used to conduct business in
16 Pennsylvania?

17 MS. CONDO: Objection to the form of the
18 question. Totally misstates this witness's testimony
19 that Chevron Corporation didn't do business in the state
20 of Pennsylvania. So by definition, there're not going
21 to be a, quote, top three agents. The question is
22 unintelligible and totally misrepresents the testimony
23 that's already been given.

24 THE WITNESS: Yeah. I don't quite understand
25 the question. Can you restate it or rephrase it.

1 MS. JOHNSON: Yeah, sure.

2 Q BY MS. JOHNSON: So the service -- we saw a
3 letter from Chevron. They have thousands of contracts
4 with various service providers. So that would be a
5 third party acting on behalf of Chevron Corporation.
6 Were there one or two service companies that Chevron
7 Corporation contracted with that did a lot -- a
8 significant amount of work in Pennsylvania?

9 MS. CONDO: Objection to the form of the
10 question. She testified numerous times previously that
11 Chevron Corporation did not engage those service
12 providers. So you're asking her a question that assumes
13 a foundation that she's already testified doesn't exist.

14 But go ahead. Explain it again.

15 THE WITNESS: Chevron Corporation does not do
16 business -- doesn't have business operations. It's just
17 a holding company. Chevron Corporation may provide
18 corporate services such as treasury, governance,
19 finance, tax. I do not believe that any of the -- those
20 officers would have gone to Pennsylvania for business.
21 I don't see a business need for that. But Chevron
22 Corporation would not send anybody to do business in
23 Pennsylvania.

24 Q BY MS. JOHNSON: I'm not asking about that.
25 I'm asking about contracts that Chevron Corporation may

1 have entered into. Is it your testimony -- because I
2 believe it's conflicting -- pursuing those --

3 MS. CONDO: That's a mischaracterization of her
4 testimony, "it's conflicting."

5 Go ahead.

6 Q BY MS. JOHNSON: So I think that it's been
7 conflicting. So Chevron Corporation, they have these
8 service agreements that we went through; correct? And
9 the one is Exhibit 18 and 19. Do you remember that?

10 A Yes.

11 Q And so Chevron Corporation on behalf of its
12 subsidiaries enters into some shared services
13 agreements; correct?

14 A Not correct. Those service agreements allow
15 Chevron Corporation to provide certain services to its
16 subsidiaries. So treasury, governance, tax, controller
17 services, those are very corporate services, and they're
18 provided because Chevron Corporation has subject matter
19 experts that can do that. It's more efficient than
20 hiring other people to do that job and training them for
21 all of the subsidiaries. So often Chevron Corporation
22 provides those services.

23 Chevron Corporation could provide other
24 services, but it doesn't. There are no agreements where
25 Chevron Corporation is providing, you know, services,

1 operational services. Chevron Corporation doesn't have
2 any operations or anybody who could provide that
3 support.

4 Q So let's go back to treasury or the corporate
5 examples that you gave. Did Chevron Corporation perform
6 any of those services on behalf of Chevron Appalachia?

7 A For example, I performed governance services
8 for Chevron Appalachia. So yes.

9 Q On behalf of Chevron Corporation; is that
10 correct?

11 A Yes.

12 Q And is the same true for Chevron U.S.A., Inc.,
13 that Chevron Corporation performed services such as
14 governance and treasury for Chevron U.S.A., Inc.; is
15 that correct?

16 A Yes.

17 Q So, for example, with treasury, was there any
18 kind of service agreement between Chevron Corporation
19 and Chevron Appalachia with respect to treasury or any
20 of those other corporate functions you just described?

21 A No.

22 Q Is there a service agreement -- we saw the
23 service agreements that Chevron and Chevron U.S.A.,
24 Inc., are parties to; correct? Those were produced by
25 your attorney. So are there any agreements -- separate

1 agreements between Chevron Corporation and Chevron
2 U.S.A. that arise out of that shared services agreement?
3 For example, Chevron Corporation, you provide some
4 governance services; correct?

5 A Correct.

6 Q Do you sometimes use a third party, another law
7 firm, a consulting company to help you do your
8 governance work?

9 A We have an agent for service of process for all
10 of our companies around the United States. So Chevron
11 Corporation -- but it's -- I believe Chevron U.S.A. is
12 the party that is in the contracts.

13 Q But some of these services Chevron Corporation
14 can either directly provide -- correct? -- or it can
15 enter into contracts with a third party to provide those
16 services to Chevron Appalachia or Chevron U.S.A.; is
17 that right?

18 A I don't that's the intent of that agreement, to
19 be honest. I don't think that's -- I think that's not
20 correct. The intent of the agreement is to allow
21 Chevron Corporation to provide certain services.

22 Q And so the services that Chevron Corporation
23 supplied to Chevron U.S.A. and Chevron Appalachia are
24 just those services you just testified to earlier; is
25 that correct?

1 A Yes.

2 Q Where would copies of agreements -- service
3 agreements be found?

4 MS. CONDO: Objection to the form of the
5 question. Service agreements between whom?

6 MS. JOHNSON: Chevron Corporation and Chevron
7 U.S.A., Inc.

8 MS. CONDO: She already testified there aren't
9 any.

10 Go ahead.

11 THE WITNESS: There are none. There are no
12 agreements between Chevron Corporation and Chevron
13 U.S.A. except for that service agreement -- the two
14 service agreements. And one has been superseded.

15 Q BY MS. JOHNSON: Now, we've talked about the
16 identification of officers, executive directors, board
17 members. Do you know of any employees employed by
18 Chevron Corporation that lived in Pennsylvania between
19 January 1st, 2011, and present?

20 A No.

21 Q Does Chevron Corporation employ a recruiting
22 agency that it uses for employment purposes?

23 A I believe so.

24 Q And do you know if that recruiting agency
25 recruits on behalf of Chevron Corporation and Chevron

1 U.S.A., Inc.?

2 A I don't know the answer to that.

3 Q So topic number 5, we have a link to a news
4 article. I appreciate your candor about saying some of
5 the stuff we learn about reading about it in the news.
6 So this particular story had to do about Chevron
7 announcing 320 job layoffs in Pennsylvania in 2020.
8 What was this situation about? What were these layoffs?

9 A I don't know. They were not Chevron
10 Corporation layoffs.

11 Q What layoffs were they?

12 A They were in Pennsylvania. It's Pennsylvania
13 they're talking about here. Oh, yeah. This was written
14 by a news article. So Chevron Corporation did not plan
15 to eliminate 320 jobs. That's incorrect. Somebody
16 outside of Chevron Corporation wrote this.

17 Q So did Chevron announce any kind of layoffs in
18 Pennsylvania in 2020?

19 MS. CONDO: Objection to the form of the
20 question with respect to "Chevron." Do you mean did
21 Chevron Corporation announce it, or did some subsidiary?
22 Or both?

23 Q BY MS. JOHNSON: Did any Chevron entity
24 announce layoffs in Pennsylvania in 2020?

25 A Not to my knowledge. I wasn't in Pennsylvania.

1 But Chevron Corporation did not.

2 Q But you were still an officer of Chevron
3 Appalachia; correct?

4 A Yes.

5 Q Did Chevron Appalachia lay off any employees?

6 A I don't know the answer to that. I was not --
7 I was a governance officer. I only did governance and
8 support. I was not a business decision-maker.

9 Q What were you aware of at the time Chevron
10 Appalachia was sold with respect to the employment of
11 the employees of Chevron Appalachia? What was your
12 understanding of that?

13 A I had no understanding of that. I knew that
14 the legal entity was being sold to EQT.

15 Q And who made the decision to sell the legal
16 entity to EQT? Was it Chevron Corporation?

17 A Chevron U.S.A., Inc.

18 Q And Chevron U.S.A., Inc., did they inquire with
19 Chevron Corporation for approval to sell a subsidiary?

20 A No.

21 Q Chevron U.S.A., Inc., did not have to get
22 approval from Chevron Corporation to sell Chevron
23 Appalachia. Is that your testimony?

24 A Yeah, that is my testimony.

25 Q How much time did you spend looking for

1 employment records of persons employed by Chevron
2 Corporation in Pennsylvania?

3 A I reached out to HR. I don't know how much
4 time I spent. Maybe a half an hour.

5 Q And who did you speak to in HR?

6 A I emailed somebody in HR. That was it. There
7 were no employees. No Chevron Corporation employees.

8 Q So Chevron Corporation itself had no knowledge
9 of either layoffs or job terminations in Pennsylvania in
10 2020; is that correct?

11 A I'm speaking on behalf of my knowledge at this
12 point. I believe that Chevron Corporation was not
13 involved in that decision.

14 Q So when I'm asking you questions, I'm asking
15 you as the designee of Chevron Corporation. Of course,
16 your personal knowledge is pertinent and, you know,
17 you'd have to testify as to that too, but this is in
18 your position here today as a designee of the
19 corporation.

20 So topic 6 --

21 MS. CONDO: If I could just indicate an
22 objection to the last question. Topic 5, which
23 references this layoff article, does not ask about
24 Chevron Corporation's knowledge. It asks the
25 identification and nature of all persons formerly or

1 presently paid or employed by Chevron Corporation,
2 including but not limited to those described herein. I
3 believe she testified in response to that there were no
4 Chevron Corporation employees that were laid off. So
5 beyond that, it's beyond the scope.

6 MS. JOHNSON: Anything else, Kathy?

7 MS. CONDO: No, not on this.

8 Q BY MS. JOHNSON: Okay. So topic 6, we spoke
9 about that. And I just want to confirm that topic 6
10 discusses, again, litigation and admin actions. And you
11 already testified as to Exhibit A covering the world of
12 those lawsuits; is that right?

13 A Yes.

14 Q Topic 7 we've kind of beaten to death. I don't
15 know, Ms. Endries, I may have one or two more questions
16 that come out of that one. But I think we've covered
17 topic 7.

18 Okay. Topic 8. We talked about contracts,
19 Chevron Corporation contracts, with Pennsylvania persons
20 or entities. And I just want to be sure that the first
21 indenture, the second supplemental indenture are the
22 only contracts that Chevron Corporation is party to with
23 respect to Item 8 here. Is that correct?

24 A Correct.

25 Q I'm sorry?

1 A Yes.

2 Q Topic 9, Chevron Corporation, is it your
3 testimony that Chevron Corporation has not committed any
4 torts in Pennsylvania from January 1st, 2011, to the
5 present?

6 A Yes.

7 Q And then what about any agents acting on behalf
8 of Chevron Corporation either by virtue of a service
9 agreement for corporate functions or potentially if
10 there are other functions? Are you aware of any torts
11 committed by an agent of Chevron Corporation in
12 Pennsylvania?

13 A No.

14 Q And in preparation for the deposition, did you
15 research and look for interactions, discussions, and
16 communications with the Pennsylvania Department of
17 Environmental Protection?

18 A No. I relied on Legal.

19 Q And topic 11, the identification and nature of
20 all alleged or proven violations by Chevron Corporation
21 or any agent. Are you aware -- is Chevron Corporation
22 aware of any of these violations by Chevron Corporation
23 or any of its agents?

24 A In Pennsylvania?

25 Q Yes, ma'am.

1 A I am not aware of any.

2 Q So Chevron Appalachia had an office in Moon
3 Township; is that correct?

4 A To my knowledge, yes.

5 Q And do you know who leased that office?

6 A I do not.

7 Q Does Chevron Corporation have service
8 agreements with real estate companies to help it find
9 leasing and properties in Pennsylvania? Are you aware
10 of any of those types of contracts?

11 A No. Chevron Corporation doesn't lease
12 property.

13 Q Right. I wasn't sure if it had a master
14 service agreement with a realty company to service its
15 subsidiaries in their names. That was my question.

16 A No.

17 Q And with respect to the Latkanich property and
18 the interest there, did Chevron Corporation at any time
19 have any interest in the wells, the impoundment pits, or
20 any other interests on the Latkanich property?

21 A No.

22 Q And with respect to contracts for the purchase
23 of PFAS, are you aware of what PFAS are?

24 A I did have to look that up.

25 Q That's okay. Does Chevron Corporation have any

1 contracts for the purchase of PFAS with any third party?

2 A No.

3 Q Does Chevron U.S.A., Inc.?

4 A I did not research Chevron U.S.A., Inc.

5 MS. CONDO: And I would just object as beyond
6 the scope.

7 Q BY MS. JOHNSON: And topic 15, what is Chevron
8 Corporation's -- you know, if we think about what
9 Chevron Corporation stated in its responses to the SEC,
10 what are Chevron Corporation's policies related to the
11 radiation that's generated by oil and gas operations?

12 A Chevron Corporation has no policies related to
13 radiation.

14 Q Does Chevron Corporation engage any third-party
15 service providers to provide guidance with respect to
16 radiation?

17 A No.

18 Q So topic 16 -- you know, of course you can't
19 believe everything that you read. That's why we're
20 here, going to talk about some of these articles here.
21 The first article talks about Chevron CEO Michael Wirth
22 doing an interview on CNBC's show Squawk Box talking
23 about the massive write-down of the company's
24 Appalachian assets.

25 What is your awareness of this interview --

1 this public interview by Chevron Corporation's CEO with
2 respect to the assets here in Pennsylvania?

3 MS. CONDO: Object to the form of the question.
4 Vague.

5 But go ahead.

6 THE WITNESS: I'm aware of it.

7 Q BY MS. JOHNSON: And what does this mean, that
8 the assets in northeastern U.S. simply don't compete as
9 well for our investment dollars; others do? What does
10 that mean?

11 A My interpretation is that it means that it's no
12 longer a good investment for Chevron Corporation.

13 Q Moving on to Veronica Flores-- and I don't
14 want to butcher her last name -- Paniagua. Do you know
15 how to --

16 A I don't.

17 Q Was she ever a Chevron Corporation employee?

18 A No.

19 Q And who authorized Veronica Flores, do you
20 know, to make public comments on behalf of Chevron?

21 MS. CONDO: Objection to the form of the
22 question to the extent you're just using generic
23 "Chevron."

24 Go ahead.

25 THE WITNESS: I don't think it was on behalf of

1 Chevron Corporation. I don't know who authorized her,
2 but I know that she is in corporate affairs. So that's,
3 you know, kind of dealing with the press.

4 Q BY MS. JOHNSON: And what about Ms. Deena
5 McMullen? Is she a Chevron Corporation employee?

6 A No, she is not.

7 Q And Kent Robertson, was he ever a Chevron
8 Corporation employee?

9 A No.

10 Q And topic 17, donations made to and programs
11 directed to any person or entity in Pennsylvania by
12 Chevron Corporation. Penn State University. What is
13 Chevron Corporation's relationship with Penn State
14 University?

15 MS. CONDO: Objection to the form of the
16 question. Assumes they have one.

17 THE WITNESS: Chevron Corporation doesn't have
18 a relationship with Penn State University.

19 Q BY MS. JOHNSON: Has Chevron Corporation ever
20 donated to Penn State University for their Innovation
21 Lab?

22 A No.

23 Q Did Penn State University name its lab after
24 Chevron? Did Chevron give Penn State University
25 permission to do that?

1 A Chevron Corporation did not give permission.

2 Q And what about the University of Pittsburgh?
3 What's the relationship between Chevron Corporation and
4 the University of Pittsburgh?

5 A Chevron Corporation has no relationship with
6 the University of Pittsburgh.

7 Q So the University of Pittsburgh just
8 voluntarily named a building the Chevron Science Center
9 without any relationship with Chevron Corporation?

10 MS. CONDO: Object to the form of the question.
11 Go ahead.

12 THE WITNESS: I don't know why they did that,
13 but they likely had a relationship with Chevron U.S.A.,
14 Inc.

15 Q BY MS. JOHNSON: And you're an officer of
16 Chevron U.S.A., Inc. Does Chevron Science Center
17 instead have the relation- -- University of Pittsburgh
18 have the relationship with Chevron U.S.A., Inc., and not
19 Chevron Corporation?

20 A I know it does not have a relationship with
21 Chevron Corporation, but as an officer of Chevron
22 U.S.A., Inc., I only focus on governance, and this would
23 not have reached me.

24 Q So the topics, then -- we've got A, B, C, and D
25 in here with respect to -- items that we've identified

1 with respect to Chevron Corporation. Is it your
2 testimony that you didn't receive any of this
3 information from the sources you relied on to prepare
4 for this deposition? Is that correct?

5 MS. CONDO: First of all, object on multiple
6 grounds. Number one, you said you have identified "A"
7 through "D" as related to Chevron Corporation. So I
8 object to that characterization -- mischaracterization.

9 Secondly, you have not asked her any question
10 about what information she obtained about these. You
11 didn't even ask her about "B" and "C." She testified
12 about her knowledge about the lack of relationship
13 between Penn State and Chevron. So on both of those
14 grounds, your question is a misrepresentation.

15 Q BY MS. JOHNSON: Ms. Endries, what is Chevron
16 Corporation's project called Chevron Leaders in the
17 Classroom Program?

18 MS. CONDO: Object to the form of the question
19 as presuming that it's Chevron Corporation's program.

20 THE WITNESS: I don't believe this is Chevron
21 Corporation's program. I believe it's Chevron U.S.A.,
22 Inc.'s program.

23 Q BY MS. JOHNSON: And so what did you do to
24 confirm that none of these items listed in item 17 had
25 to do with Chevron Corporation?

1 A I read the articles that you sent, and I looked
2 them up, and they're, like, Chevron U.S.A., Inc., you
3 know, energy technology company, Chevron U.S.A., Inc.,
4 company division.

5 Q So the question asked identification and nature
6 of all donations made to and any programs directed to
7 person or entity in Pennsylvania, including these
8 examples. Were there any donations identified coming
9 from Chevron Corporation to any person or entity in
10 Pennsylvania from January 1st, 2011, to present?

11 A No.

12 Q And topic 18, item 18, what is Chevron
13 Corporation's -- do they do any political lobbying or
14 donations directed to any elected Pennsylvania official?

15 A No.

16 Q And does Chevron Corporation have a PAC?

17 A It does have a PAC, yes. I don't know -- you
18 know what? I don't know if it's Chevron Corporation or
19 Chevron U.S.A., Inc., but there is a PAC.

20 Q And do you know if that PAC donates to
21 Pennsylvania?

22 A I don't know.

23 Q You had mentioned before that, I believe -- and
24 correct me if I'm wrong -- that Chevron Corporation will
25 sometimes purchase research from third parties and share

1 that with subsidiaries. Is that true?

2 A I didn't say they did. I said -- I tried to
3 give you an example --

4 Q Yeah, sure.

5 A -- of what happened. I do not have any
6 knowledge of Chevron Corporation ever doing that. I was
7 just trying to give you an example of what could happen.

8 Q And Item 20, are you aware of what the
9 Marcellus Shale Coalition here is in Pennsylvania?

10 A Not particularly.

11 Q And did Chevron Corporation ever have a
12 membership with the Marcellus Shale Coalition?

13 A No, it did not.

14 Q And did Chevron Corporation ever have an
15 employee speak at a Marcellus Shale Coalition event?

16 A I don't know the answer to that.

17 Q And what did you do in preparation for this
18 deposition to search for contacts with the Marcellus
19 Shale Coalition?

20 A I looked at your -- the document you provided,
21 Marcellus Shale Coalition. I saw that the website
22 content owner listed Patrick Blough in the 2016
23 conference highlights. I looked up Patrick to confirm
24 that he was employed by Chevron U.S.A., Inc. And he's
25 not a Chevron Corporation employee and never was.

1 Q And did you research any other potential
2 contacts between Chevron Corporation and the Marcellus
3 Shale Coalition other than what was linked here as an
4 example?

5 A No. I just relied on legal research.

6 Q Topic 21, boards, advisory committees, social
7 clubs, commissions, or similar positions relating to
8 Pennsylvania on which Chevron Corporation or any of its
9 agents are members. Are you aware of any of those?

10 A No.

11 MS. JOHNSON: Okay. I'm going to break here
12 for about ten minutes. And then when we come back, we
13 should be able to wrap up in, I would say, 45 minutes or
14 less. Let's take a 10-minute break, and we'll be back.

15 MS. CONDO: Okay. Thank you.

16 THE VIDEOGRAPHER: This marks the end of media
17 number 3. The time is 3:39 p.m. We are off the record.

18 (A break was taken from 3:39 p.m. to 3:51 p.m.)

19 THE VIDEOGRAPHER: This marks the beginning of
20 media number 4. The time is 3:51 p.m. We are back on
21 the record.

22 MS. JOHNSON: Thank you.

23 Q BY MS. JOHNSON: Ms. Endries, I actually just
24 have one question left, and we're done. Do you know who
25 Jones Day is representing there?

1 A I do not.

2 MS. JOHNSON: Okay. Well, that's all I have.
3 Thank you. It was hopefully a short six hours. And I
4 appreciate you sitting for this. I know it's not easy
5 to sit for depositions and be put under oath and have to
6 deal with, you know, questions and objections. I do --
7 we do, we appreciate your time.

8 To the court reporter and our videographer,
9 thank you all for helping us get through this deposition
10 today. It's very much appreciated.

11 MS. CONDO: I have no questions. We'll read
12 and sign, though.

13 MS. JOHNSON: Sure.

14 THE COURT REPORTER: Ms. Condo, did you want a
15 copy?

16 MS. CONDO: Yes, please.

17 THE VIDEOGRAPHER: How about the video,
18 Ms. Condo?

19 MS. CONDO: Yes, please.

20 THE COURT REPORTER: Okay. Also, do you want
21 the original sent to you, Ms. Condo?

22 MS. CONDO: To fill out the errata sheet, you
23 mean?

24 THE COURT REPORTER: Yes.

25 MS. CONDO: Yes, please, and I'll get it to the

1 witness.

2 THE COURT REPORTER: Ms. Johnson, I need the
3 exhibits, and could you please make sure they're marked.

4 MS. JOHNSON: I will get with you probably --
5 it's 7:00 o'clock here. I'll get with you -- you should
6 have the Dropbox link to most of the exhibits. I just
7 have to mark the other two, which are probably
8 duplicative, and I'll get those to you no later than
9 tomorrow morning.

10 THE VIDEOGRAPHER: We are off the record at
11 3:54 p.m. And this concludes today's testimony given by
12 Kari Endries. The total number of media used was four
13 and will be retained by Veritext Legal Solutions.

14 THE COURT REPORTER: Thank you.

15 (Whereupon, the deposition proceedings were
16 concluded at 3:54 p.m.)

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REPORTER'S CERTIFICATE

I, SHEILA A. DETWILER, CSR No. 2847, Certified
Shorthand Reporter, certify:

That the foregoing proceedings were taken
before me at the time and place therein set forth, at
which time the witness was put under oath by me;

That the testimony of the witness, the
questions propounded, and all objections and statements
made at the time of the examination were recorded
stenographically by me and were thereafter transcribed;

That the foregoing is a true and correct
transcript of my shorthand notes so taken.

I further certify that I am not a relative or
employee of any attorney of the parties, nor financially
interested in the action.

I declare under penalty of perjury under the
laws of California that the foregoing is true and
correct.

Dated this 12th day of December, 2023.



SHEILA A. DETWILER, CSR No. 2847

1 KATHY K. CONDO, ESQ.

2 kcondo@babstcalland.com

3 December 12, 2023

4 RE: Latkanich v. EHB, Et Al.

5 12/6/2023, Kari Endries (#6315659)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel.

15
16
17 Return completed errata 30 days from
18 receipt of testimony.

19 If the witness fails to do so within the time
20 allotted, the transcript may be used as if signed.

21

22 Yours,

23 Veritext Legal Solutions

24

25

1 Latkanich v. EHB, Et Al.

2 Kari Endries (#6315659)

3 E R R A T A S H E E T

4 PAGE_____ LINE_____ CHANGE_____

5 _____

6 REASON_____

7 PAGE_____ LINE_____ CHANGE_____

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9 REASON_____

10 PAGE_____ LINE_____ CHANGE_____

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12 REASON_____

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18 REASON_____

19 PAGE_____ LINE_____ CHANGE_____

20 _____

21 REASON_____

22 _____

23 _____

24 Kari Endries

Date

25

1 Latkanich v. EHB, Et Al.

2 Kari Endries (#6315659)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Kari Endries, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10

11

12 Kari Endries

_____ Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS
15 _____ DAY OF _____, 20____.

16

17

18

19 NOTARY PUBLIC

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25

[& - 2028]

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[agreement - answers]

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[answers - assets]

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Washington State Court Rules

Rule CR 30

Depositions Upon Oral Examination

(e) Submission to Witness; Changes; Signing.

When the testimony is fully transcribed the deposition shall be submitted to the witness for Examination and shall be read to or by the witness, unless such examination and reading are waived by the witness and by the parties. Any changes in Form or substance which the witness desires to make shall be entered upon the deposition by the officer with a statement of the reasons given by the Witness for making them. The deposition shall then be signed by the witness, unless the parties by stipulation waive the signing or the witness Is ill or cannot be found or refuses to sign. If the deposition is not signed by the witness within 30 days of its submission to the witness, the Officer shall sign it and state on the record the fact of the waiver or of the illness or absence of the witness or the fact of the refusal to sign Together with the reason, if any, given therefor; and the deposition may then be used as fully as though signed unless on a motion to suppress under

Rule 32(d)(4) the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

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VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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Latkanich v. Chevron Corporation

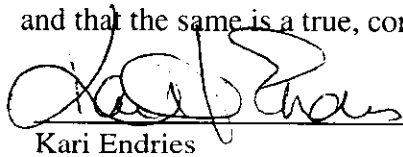
Kari Endries (#6315659)

ERRATA SHEET

PAGE	LINE	CHANGE
23	2	No. Chevron Corporation does not have any documents related to its oil and gas operations in Pennsylvania. (I need to clarify my answer.)
28	12	I just know the organization chart. (Inaccurate transcription based on review of videotape)
61	11-12	Would be president and certain business vice-presidents (Inaccurate transcription based on review of videotape)
85	8	No she was not. (Inaccurate transcription based on review of videotape)
94	16	I'm unfamiliar with the exact terms..... (Inaccurate transcription based on review of videotape)
103	9-10	No, not a Chevron Corporation officer or employee. (Inaccurate transcription based on review of videotape)

ACKNOWLEDGEMENT OF DEPONENT

I, Kari Endries, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me.


Kari Endries

1/17/24
Date

*If notary is required

SUBSCRIBED AND SWORN TO BEFORE ME THIS
17th DAY OF JANUARY, 2024


NOTARY PUBLIC

See Attached Certificate

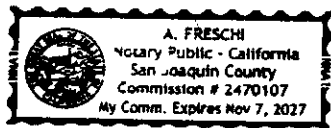
A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Contra Costa

Subscribed and sworn to (or affirmed) before me on this 17th day of January, 2024, by
Date Month Year

(1) KARI H. ENDRIES
(and (2) N/A),
Name(s) of Signer(s)



Place Notary Seal and/or Stamp Above

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature *A. Freschi*
Signature of Notary Public

OPTIONAL

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EXHIBIT B

From: Oliver, Trip[o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19e305c669b74d65a21ecfdd3dd6a9c1-KDRD]
Sent: Fri 9/20/2019 2:03:25 PM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Subject: FW: [**EXTERNAL**] RE: Questions

Veronica,
I recommend we think about working some of the information below into our comments about the toxicologist when/if we give our comments to CNBC. This is not an independent expert. Let me know what you think. Thanks.
Trip

From: Oliver, Trip
Sent: Tuesday, July 9, 2019 4:44 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Subject: RE: [**EXTERNAL**] RE: Questions

Veronica,
I was looking at several of the links in the emails below. I really think there might be an opening for us to at least raise the question about Dr. Abesamis's credibility as an "independent" health expert given his clear ties to anti-oil and gas activist organizations.

He was a speaker at a May 2019 event called From Wellhead to Ethane Cracker: Shale Gas, Petrochemicals and Health. This event was sponsored by the Breathe Project and the SW PA Environmental Health Project, which are two anti O&G activist organizations heavily funded by the Heinz Endowments. (See two links immediately below)

<http://www.marcellusprotest.org/content/wellhead-cracker-shale-gas-petrochemicals-and-health>
<https://breatheproject.org/event/from-wellhead-to-ethane-cracker-shale-gas-petrochemicals-and-health/>
In addition, he was a speaker at another event hosted by the SW PA Environmental Health Project back in 2016 entitled Health and Shale Gas: State of the Science.

<http://www.sustainablepittsburgh.org/Pub/SWPACONFbrochure.pdf>

As you can see on page 33 of the link below, he was also the toxicologist for the granddaughter of Jane Worthington, who has been in a dispute with Range Resources for a number of years as you can see from the second link below.

<http://www.irrc.state.pa.us/docs/3042/RELATED/3042%2006-01-15%20WASHINGTON%20PUBLIC%202.pdf>
www.environmentalintegrity.org/what-we-do/oil-and-gas/the-human-cost-of-energy-production/the-worthingtons/

I think it is fair to ask the reporter whether he should be treating Dr. Abesamis as an unbiased medical expert, when he has spoken on behalf of anti O&G activist groups in the past. At the very least a true journalist would qualify the doctor's opinion by pointing out those conflicts. If we bring those conflicts to Templeton's attention before the story runs, doesn't that lay the groundwork for us to discredit the story later?

Finally, I spoke with John Sutter of FTI, and he told me what he know about the other three cases. Below is an article about complaints made against EQT back in 2014. Mickey Gniadek in this story is likely to be one of the people featured. Also, the story will likely feature the story of Jane Worthington's granddaughter Alexis and the alleged health issues she has as a result of Range Resources. John wasn't sure yet what the fourth case would be.

https://observer-reporter.com/news/localnews/eqt-well-site-complaints-resurface-in-finleyville/article_9bdde5e8-d519-5768-a49f-1e84d246e595.html

https://observer-reporter.com/news/localnews/state-supreme-court-washington-county-residents-testimony-was-proper-for/article_5e1fe3aa-8619-11e9-9acc-3fe4a4a6061a.html

From: Flores-Paniagua, Veronica
Sent: Thursday, June 27, 2019 4:51 PM
To: Oliver, Trip <TripOliver@chevron.com>
Cc: Windle, Travis <Travis.Windle@fticonsulting.com>
Subject: RE: [**EXTERNAL**] RE: Questions

Thanks for the update, Trip. I have a couple of ideas on next steps that would probably need FTI's support. Trip, if you're back next week, and Travis, if you're available Monday or Tuesday, let's plan a call to talk this over.

Best,

Veronica

From: Oliver, Trip
Sent: Wednesday, June 26, 2019 11:32 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Subject: FW: [**EXTERNAL**] RE: Questions

Veronica,

Just thought you should know that the doctor who “diagnosed” Mr. Latkanich is a University of Pittsburgh Professor of Emergency Medicine, and is closely linked to several anti-oil & gas groups in the Pittsburgh area funded by the Heinz Endowments. Hardly an unbiased source.

From: Miller, Joseph

Sent: Monday, June 24, 2019 3:43 PM

To: Oliver, Trip <TripOliver@chevron.com>

Subject: RE: **[**EXTERNAL**]** RE: Questions

Hi Trip,

In response to your question on Dr. Abesamis’s connections to the Heinz Endowments or Heinz backed researchers/entities,

Aside from what FTI found below (and noting that the Breathe Collaborative is a Heinz project that received \$850,000 in grants in 2018), Abesamis is connected to the Southwest PA Environmental Project, which is Heinz created and Heinz supported. This would put him in contact with Heinz connected researches such as David Brown. He was a speaker at Southwest PA Environmental Project’s *Health & Shale Gas Development: State of the Science* conference in 2016 and their 2019 *FROM WELLHEAD TO ETHANE CRACKER: SHALE GAS, PETROCHEMICALS, AND HEALTH* conference.

https://web.archive.org/web/2016*/https://www.environmentalhealthproject.org/wpforms/

<http://www.marcellusprotest.org/content/wellhead-cracker-shale-gas-petrochemicals-and-health>

It is likely that Southwest PA Environmental Project’s head has been in contact with Abesamis since at least 2012, when he has most likely contacted over the Range Resources case by Southwest PA Environmental Project and others involved.

<https://naturalgasnow.org/wp-content/uploads/2015/11/Rippel-Deposition-Transcript.pdf>

Given the volume of grants from the Heinz Endowments to University of Pittsburgh and their often obscure purposes, it is possible Abesamis’s research on fracking may have been directly or indirectly funded by Heinz.

An analysis of Abesamis’s social media (Twitter, Facebook, LinkedIn) did not reveal activist connections to the Heinz Endowments.

I’d be happy to elaborate on any of these issues if need be.

Best,

Joe

Joseph Miller

Intelligence and Risk Assessment Analyst

Public Affairs

Chevron Corporation

Corporate Affairs

6001 Bollinger Canyon Road

San Ramon, CA 94583

Tel 925 842 1062

From: Oliver, Trip

Sent: Monday, June 24, 2019 10:40 AM

To: Miller, Joseph <Joseph.Miller@chevron.com>

Subject: Re: **[**EXTERNAL**]** RE: Questions

If possible, it would be great to have something by tomorrow. Thanks

Sent from my iPhone

On Jun 24, 2019, at 1:37 PM, Miller, Joseph <Joseph.Miller@chevron.com> wrote:

Sure,

Did you have a time you wanted this completed by?

Joe

From: Oliver, Trip

Sent: Monday, June 24, 2019 10:11 AM

To: Miller, Joseph <Joseph.Miller@chevron.com>

Subject: Fwd: **[**EXTERNAL**]** RE: Questions

Joe,

Could you do some research into this doctor, and let me know what connections you can find to Heinz funded

activists. Below is some info I got from FTI. Thanks.
Trip

Sent from my iPhone
Begin forwarded message:

From: "Windle, Travis" <Travis.Windle@fticonsulting.com>
Date: June 24, 2019 at 12:49:23 PM EDT
To: "Oliver, Trip" <TripOliver@chevron.com>
Subject: **[**EXTERNAL**]** RE: Questions

He's tied in closely with a number of Heinz-funded organizations, including the Breathe Project / Collaborative.
<https://breatheproject.org/event/from-wellhead-to-ethane-cracker-shale-gas-petrochemicals-and-health/>
They get their Heinz money funneled / laundered through the Community Foundation for the Alleghenies:
<http://www.heinz.org/grants/grants-awarded>

<image001.jpg>

He's also very close with Jane Worthington – see pg. 34:

<http://www.irrc.state.pa.us/docs/3042/RELATED/3042%2006-01-15%20WASHINGTON%20PUBLIC%202.pdf>

<http://www.environmentalintegrity.org/what-we-do/oil-and-gas/the-human-cost-of-energy-production/the-worthingtons/>

More here on the Ft. Cherry issues from Range: <http://www.rangeresources.com/media/news/2019/05/16/landmark-report-shows-no-health-impacts-from-shale-development>

<http://www.heinz.org/grants/grants-awarded>

<image002.jpg>

And he's even spoken at events sponsored by the Carnegie Science Center (ironic?!):

<https://www.pghcitypaper.com/Blogh/archives/2013/08/12/doctor-speaks-tonight-on-health-effects-of-fracking>

From: Windle, Travis

Sent: Monday, June 24, 2019 12:16 PM

To: Oliver, Trip <TripOliver@chevron.com>

Subject: RE: Questions

Sure does – standby. We have some info on him and the circles he runs in.

From: Oliver, Trip <TripOliver@chevron.com>

Sent: Monday, June 24, 2019 12:00 PM

To: Windle, Travis <Travis.Windle@fticonsulting.com>

Subject: [EXTERNAL] Fwd: Questions

Does this guys name ring a bell to you?

Sent from my iPhone
Begin forwarded message:

From: "Flores-Paniagua, Veronica" <VFloresPaniagua@chevron.com>
Date: June 24, 2019 at 11:01:00 AM EDT
To: "Oliver, Trip" <TripOliver@chevron.com>
Subject: RE: Questions

Good morning. Finally figured out the name of the doc - the reporter really mangled his name. It's Michael Abesamis. He's assistant professor of Emergency Medicine at UPMC.

Nothing yet from CNBC. I'll keep you posted.

-----Original Message-----

From: Oliver, Trip

Sent: Monday, June 24, 2019 7:01 AM

To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>

Subject: Questions

Hey Veronica,

I was wondering if you were able to find out the name of the doctor that the PG reporter mentioned. I am curious if he is connected to any activist group.

Also, have you heard anything more from CNBC. Thanks.

Trip

Sent from my iPhone

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This email and any attachments may be confidential and protected by legal privilege. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the e-mail or any attachment is prohibited. If you have received this email in error, please notify us immediately by replying to the sender and then delete this copy and the reply from your system. Thank you for your cooperation.

From: Sutter, John[John.Sutter@fticonsulting.com]
Sent: Mon 3/1/2021 3:48:02 PM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Cc: Windle, Travis[Travis.Windle@fticonsulting.com]
Subject: [****EXTERNAL****] RE: [EXTERNAL] update on EHN "study"

Hi, Veronica –

You may have seen this already, but just wanted to share that this EHN series finally hit this morning, with the Latkanich's the subject of part 2. It's a lengthy series with lots to unpack, but haven't seen much traction on it beyond the activist groups who are funded by the same foundation (Heinz Endowments).

Let's catch up over the phone if you have a minute early this week. Pretty flexible this afternoon and tomorrow if there's a window that looks good for you.

Looking forward to it.
John

Overview: <https://www.ehn.org/fractured-series-on-fracking-pollution-2650624600/fractured-fracking>
Part 1: <https://www.ehn.org/fractured-harmful-chemicals-fracking-2650428324/family-video>
Part 2: <https://www.ehn.org/fractured-fracking-mental-health-toll-2650516366/particle-27>
Part 3: <https://www.ehn.org/fractured-fracking-regulation-neglect-2650594611/particle-1>
Part 4: <https://www.ehn.org/fractured-oil-and-gas-pollution-2650623184/particle-26>

From: Sutter, John
Sent: Wednesday, November 4, 2020 8:21 AM
To: Flores-Paniagua, Veronica <vflorespaniagua@chevron.com>
Subject: RE: [EXTERNAL] update on EHN "study"

Looking forward to chatting in a bit. Here's the approach we're weighing for the MSC. We got her to admit this in writing, which will be helpful in post-story fact-checks / beating back any copycats: *"This data has not yet been peer reviewed or published. These are preliminary findings and analysis and review are still underway."*

"For the tens of thousands of Pennsylvanians who work hard each day producing natural gas in the communities where they live and raise their families, there's no greater priority than safety. We're proud to responsibly produce clean, affordable natural gas, which creates local community, public health, economic and environmental benefits – benefits that have been widely documented by any number of independent agencies and research bodies over the years.

"As an industry of engineers, we take science seriously. We also understand that certain organizations utilize aligned entities -- which they financially support -- to spread fear and misinformation. We can accept that reality, but we do not accept their so-called 'research,' which fails to meet the most basic thresholds to be considered remotely credible. It's convenient for the Environmental Health News and its anti-natural gas financiers at the Heinz Endowments to gloss over the fact that this 'study' hasn't been independently peer reviewed or analyzed for objective controls and variables, or even validated by someone who's not a blogger.

"Protecting and enhancing public health is our top priority and we'll continue to seek out and look to legitimate, independent scientific analysis. As part of this commitment to actual science, we'll also ensure the public has important facts and understand the motivations of certain organizations that peddle misinformation and fear aimed at driving clicks." Marcellus Shale Coalition president David Spigelmyer

From: Sutter, John
Sent: Tuesday, November 3, 2020 7:53 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Cc: Windle, Travis <Travis.Windle@fticonsulting.com>
Subject: Re: [EXTERNAL] update on EHN "study"

Hi, Veronica - It's a big night! Always takes me back to my campaign days, although I'm grateful to wake up tomorrow still employed! Let's definitely connect in the morning to swap notes. Pretty flexible tomorrow - would 10am EST work for you?

On Nov 3, 2020, at 5:16 PM, Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com> wrote:

Hi, y'all. As someone who has been in a newsroom for a good number of presidential elections, I'm having a hard time concentrating today. I should have written this simple note to you hours ago, but I have been getting lost in my Twitter feed. LOL.

Along with one of AMBU's former lawyers who's still providing counsel on the Latkanich issue, I met today with the Chevron toxicologist who reviewed the EHN report. In summary, she said that the study design was not appropriate. She also said that there's no evidence that people who collected the samples were qualified to do so. (Didn't the reporter say *she* collected the samples?) Thus, the health comparison values mean nothing (because the data would be considered invalid by basic scientific standards.)

I wondered if you've been able to get the study reviewed independently. If it's possible to grab about 15 minutes of your time tomorrow, can we chat about next steps?

Best,
Veronica

Veronica Flores-Paniagua
External Affairs Advisor - Americas
Chevron Corporation
Corporate Affairs

1400 Smith Street, Office 49098
Houston, TX 77002
P: 713-372-0063
C: 713-213-3082
VFloresPaniagua@chevron.com
[@vxflores](https://twitter.com/vxflores)

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From: Ordonez, Isabel I[/O=CHEVRON/OU=AG01/CN=RECIPIENTS/CN=EOJC]
Sent: Tue 11/21/2017 11:26:06 PM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Cc: Oliver, Trip[TripOliver@chevron.com]; Calvert, Nathan[ncalvert@chevron.com]
Subject: Re: **[**EXTERNAL**]** RE: Chevron response to Scott Tong story

This is excellent. Good job Veronica. When you have a minute please heads up to Linda, Morgan and Kent but include in the note the text of the correction.

Sent from my iPhone

On Nov 21, 2017, at 5:21 PM, Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com> wrote:

FYI...

Begin forwarded message:

From: "Gordon, Jon" <JGordon@marketplace.org>
Date: November 21, 2017 at 4:46:41 PM CST
To: "Flores-Paniagua, Veronica" <VFloresPaniagua@chevron.com>
Subject: **[**EXTERNAL**]** RE: Chevron response to Scott Tong story

Hi Veronica,
Sorry this took some time but we wanted to be careful and deliberate.
Today we issued some corrections on Scott Tong's story.
<https://www.marketplace.org/2017/11/14/world/documents-show-undisclosed-epa-health-concerns-fracking-chemicals-0>
We also issued an on-air correction.
Thanks for working with me on it.
Jon Gordon
Interim Managing Editor
Marketplace
(612) 805-1875

From: Flores-Paniagua, Veronica [mailto:VFloresPaniagua@chevron.com]
Sent: Thursday, November 16, 2017 3:11 PM
To: Gordon, Jon <JGordon@marketplace.org>
Subject: RE: Chevron response to Scott Tong story
Thank you so much, Jon.

From: Gordon, Jon [mailto:JGordon@marketplace.org]
Sent: Thursday, November 16, 2017 5:05 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Subject: **[**EXTERNAL**]** RE: Chevron response to Scott Tong story

Hi Veronica,
We are working through it. The main editor of the story is out, and I need her attention to it as well as my own. Rest assured we are moving. Just not done yet. I will make sure to let you know.
Thank you.
Jon

From: Flores-Paniagua, Veronica [<mailto:VFloresPaniagua@chevron.com>]

Sent: Thursday, November 16, 2017 2:37 PM

To: Gordon, Jon <JGordon@marketplace.org>

Subject: RE: Chevron response to Scott Tong story

Hi, Jon. Circling back on this. Have you made any determination on next steps?

Best,

Veronica

From: Gordon, Jon [<mailto:JGordon@marketplace.org>]

Sent: Wednesday, November 15, 2017 9:40 PM

To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>

Subject: [**EXTERNAL**] Re: Chevron response to Scott Tong story

Thank you. We will discuss and get back to you.

Jon Gordon

From: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>

Sent: Wednesday, November 15, 2017 7:29:38 PM

To: Gordon, Jon

Subject: Chevron response to Scott Tong story

Jon,

Thanks again for taking the time to call. As I mentioned, we have several concerns about the fracking story by Scott Tong that aired Tuesday. Above all, we're troubled that Mr. Tong did not contact us for the story, if not for balance, for important context that could have benefitted his reporting and development of his story. To that end, we are requesting publication and broadcast of the following clarifications to balance the coverage.

Chevron takes public health very seriously and one of our top priorities is to protect the environment and the community. While we respect Mr. Latkanich's right to air his concerns, we also believe it is important that any news story accurately portrays the facts.

Missing from the story is the fact that in 2013, Chevron Appalachia and the Pennsylvania Department of Environmental Protection ("DEP") investigated concerns previously raised by Mr. Latkanich regarding the quality of his well water. Based on a review of the 2011 pre-drill and 2013 post-drill water samples, both Chevron and the DEP concluded that Chevron Appalachia's operations did not affect Mr. Latkanich's water.

Mr. Tong's story also contains several inaccuracies, one of them right at the start. The story states that Mr. Latkanich sold Chevron the right to drill on his property seven years ago. The lease allowing drilling on his land originated with Atlas Energy, which Chevron later acquired.

The story also states: "The state found that Chevron illegally dumped frack water on his property." The statement is inaccurate and should be corrected. The state's notice of violation dated January 8, 2013, says no such thing. The state's notice is related to the company's work to remove accumulated rainwater from the drilling site during the reclaiming process. The company was restoring the site after active operations had been completed on the well pad. Immediately upon learning of the DEP's concerns, Chevron stopped pumping the rainwater, and the remaining rainwater was hauled out by truck. Chevron's testing of the rainwater, as reported to the state, found it to be within state standards for discharge requirements under Chapter 78.60.

Additionally, the story states that Mr. Latkanich “thinks fracking chemicals that were shot down the gas well and came back up were stored in a pit on his property that wasn’t lined (as it was supposed to be) to prevent leaking. Latkanich brought out pictures that he says show this. He said maybe the liner was pulled out.”

We adhere to local, state and federal regulations, including the use of a liner in the containment area used to hold produced water. In the case of the drilling site on Mr. Latkanich’s property, operations were completed in July 2012. The produced water and then the liner were completely removed in August 2012. It would have been useful for the reporter to verify when Mr. Latkanich’s photos were taken. The timing is key.

Protecting people and the environment is one of our company’s core values, and it’s a story we would be glad to tell. We also would guide you to trade groups such as the Marcellus Shale Coalition for a fuller portrayal of our industry.

We look forward to learning your response to our concerns.

Best,

Veronica

Veronica Flores-Paniagua

External Affairs Advisor

Policy, Government and Public Affairs

Chevron North America E&P

1400 Smith Street, Office 49095

Houston, TX 77002

P: 713-372-0063

C: 713-213-3082

VFloresPaniagua@chevron.com

@vxflores

From: Ordonez, Isabel I [/O=CHEVRON/OU=AG01/CN=RECIPIENTS/CN=EOJC]
Sent: Thur 11/16/2017 1:19:19 AM (UTC)
To: Flores-Paniagua, Veronica [VFloresPaniagua@chevron.com]
Subject: RE: final draft of response - also sending to lawyer

I'll send it to Morgan.

Isabel Ordóñez

Upstream Senior External Affairs Advisor
Policy, Government and Public Affairs
Chevron Corporation
1400 Smith Street, Office 49098
Houston, TX 77002
P: 713-372-1841
C: 713-380-9296
isabel.ordonez@chevron.com
@IOrdonezChevron

From: Flores-Paniagua, Veronica

Sent: Wednesday, November 15, 2017 7:19 PM

To: Ordonez, Isabel I <isabel.ordonez@chevron.com>

Subject: RE: final draft of response - also sending to lawyer

I just sent the final draft and ask for feedback pronto so I can send to Marketplace

From: Ordonez, Isabel I

Sent: Wednesday, November 15, 2017 7:17 PM

To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>

Subject: RE: final draft of response - also sending to lawyer

Ok, that is ok, but ask Trip and the lawyer to read it carefully. What about show it to Stacy?

Isabel Ordóñez

Upstream Senior External Affairs Advisor
Policy, Government and Public Affairs
Chevron Corporation
1400 Smith Street, Office 49098
Houston, TX 77002
P: 713-372-1841
C: 713-380-9296
isabel.ordonez@chevron.com
@IOrdonezChevron

From: Flores-Paniagua, Veronica

Sent: Wednesday, November 15, 2017 7:17 PM

To: Ordonez, Isabel I <isabel.ordonez@chevron.com>

Subject: RE: final draft of response - also sending to lawyer

Stacey Olson is pushing Trip hard to send ASAP.

From: Ordonez, Isabel I

Sent: Wednesday, November 15, 2017 7:16 PM

To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>

Subject: RE: final draft of response - also sending to lawyer

Much better. Please ask the lawyer and Trip to read it carefully. Ask them if the consultancy can read it as well. Even if it takes us one more day, it will be good to do it.

Isabel Ordóñez

Upstream Senior External Affairs Advisor
Policy, Government and Public Affairs
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1400 Smith Street, Office 49098
Houston, TX 77002
P: 713-372-1841
C: 713-380-9296
isabel.ordonez@chevron.com
@IOrdonezChevron

From: Flores-Paniagua, Veronica

Sent: Wednesday, November 15, 2017 7:13 PM

To: Ordonez, Isabel I <isabel.ordonez@chevron.com>

Subject: final draft of response - also sending to lawyer

Hi, Jon.

Thanks again for taking the time to call. As I mentioned, we have several concerns about the fracking story by Scott Tong that aired yesterday. Above all, we're troubled that Mr. Tong did not contact us for the story, if not for balance, for important context that could have benefitted his reporting and development of his story. To that end, we are requesting publication and broadcast of the following clarifications to balance the coverage.

Chevron takes public health very seriously and one of our top priorities is to protect the environment and the community. While we respect Mr. Latkanich's right to air his concerns, we also believe it is important that any news story accurately portrays the facts.

Missing from the story is the fact that in 2013, Chevron Appalachia and the Pennsylvania Department of Environmental Protection ("DEP") investigated concerns previously raised by Mr. Latkanich regarding the quality of his well water. Based on a review of the 2011 pre-drill and 2013 post-drill water samples, both Chevron and the DEP concluded that Chevron Appalachia's operations did not affect Mr. Latkanich's water.

Mr. Tong's story also contains several inaccuracies, one of them right at the start. The story states that Mr. Latkanich sold Chevron the right to drill on his property seven years ago. The lease allowing drilling on his land originated with Atlas Energy, which Chevron later acquired.

The story also states: "The state found that Chevron illegally dumped frack water on his property." The statement is inaccurate and should be corrected. The state's notice of violation dated January 8, 2013, says no such thing. What the state's notice describes is related to the company's work to remove accumulated rainwater from the drilling site as part of the reclaiming process – that is, the company was in the process of returning the site to its original state because active operations had been completed on the well pad. Chevron took corrective action immediately upon learning of the DEP's concerns about the rainwater. Pumping was stopped, and the remaining rainwater was hauled out by water truck. Chevron's testing of the rainwater being pumped out of the site, as reported to the state, found it to be well within state standards for discharge requirements under Chapter 78.60.

Additionally, the story states that Mr. Latkanich "thinks fracking chemicals that were shot down the gas well and came back up were stored in a pit on his property that wasn't lined (as it was supposed to be) to prevent leaking. Latkanich brought out pictures that he says show this. He said maybe the liner was pulled out."

Our standard operating process for our drilling sites requires us to adhere to state and federal environmental regulations, and this includes use of a liner in the containment area used to hold produced water. The only time that the containment area would have been unlined is after operations had been completed on the well pad, and the produced water, along with all associated waste, was completely removed. In the case of the drilling site on Mr. Latkanich's property, operations were completed in July 2012, and the produced water, along with all associated waste, was completely removed in August 2012. It would have been useful for the reporter to verify when Mr. Latkanich's photos were taken. The context of the timing is key.

Protecting people and the environment is one of our company's core values, and it's a story we would be glad to tell. We also would guide you to trade groups such as the Marcellus Shale Coalition for a fuller portrayal of our industry.

We look forward to learning your response to our concerns.

Veronica Flores-Paniagua

External Affairs Advisor

Policy, Government and Public Affairs

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Houston, TX 77002

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C: 713-213-3082

VFloresPaniagua@chevron.com

@vxflores

From: Crinklaw, Morgan J[/O=CHEVRON/OU=AG01/CN=RECIPIENTS/CN=MKWZ]
Sent: Thur 11/16/2017 1:38:58 AM (UTC)
To: Ordonez, Isabel I[isabel.ordonez@chevron.com]
Cc: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]; Robertson, Kent S[KRDQ@chevron.com]
Subject: RE: Response to NPR

Great work.

Morgan Crinklaw

Manager, Upstream External Affairs

Policy, Government and Public Affairs

Chevron Corporation

6001 Bollinger Canyon Rd., G2180

San Ramon, CA 94583

Office: 925-842-4204

Cell: 925-336-6415

Follow me: @mjcrinklaw

From: Ordonez, Isabel I
Sent: Wednesday, November 15, 2017 5:24 PM
To: Crinklaw, Morgan J <Morgan.Crinklaw@chevron.com>
Cc: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Subject: Response to NPR

Morgan, this is the email that Veronica is planning to send to NPR. This has been developed in consultation with the BU. Their lawyer is taking a final read. Please let us know if you have questions or suggestions.

From: Flores-Paniagua, Veronica
Sent: Wednesday, November 15, 2017 7:13 PM
To: Ordonez, Isabel I <isabel.ordonez@chevron.com>
Subject: final draft of response - also sending to lawyer

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External Affairs Advisor

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Subject: RE: Response to NPR

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Morgan Crinklaw

Manager, Upstream External Affairs

Policy, Government and Public Affairs

Chevron Corporation

6001 Bollinger Canyon Rd., G2180

San Ramon, CA 94583

Office: 925-842-4204

Cell: 925-336-6415

Follow me: @mjcrinklaw

From: Ordonez, Isabel I
Sent: Wednesday, November 15, 2017 5:24 PM
To: Crinklaw, Morgan J <Morgan.Crinklaw@chevron.com>
Cc: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Subject: Response to NPR

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From: Flores-Paniagua, Veronica
Sent: Wednesday, November 15, 2017 7:13 PM
To: Ordonez, Isabel I <isabel.ordonez@chevron.com>
Subject: final draft of response - also sending to lawyer

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the well pad. Chevron took corrective action immediately upon learning of the DEP's concerns about the rainwater. Pumping was stopped, and the remaining rainwater was hauled out by water truck. Chevron's testing of the rainwater being pumped out of the site, as reported to the state, found it to be well within state standards for discharge requirements under Chapter 78.60.

Additionally, the story states that Mr. Latkanich "thinks fracking chemicals that were shot down the gas well and came back up were stored in a pit on his property that wasn't lined (as it was supposed to be) to prevent leaking. Latkanich brought out pictures that he says show this. He said maybe the liner was pulled out."

Our standard operating process for our drilling sites requires us to adhere to state and federal environmental regulations, and this includes use of a liner in the containment area used to hold produced water. The only time that the containment area would have been unlined is after operations had been completed on the well pad, and the produced water, along with all associated waste, was completely removed. In the case of the drilling site on Mr. Latkanich's property, operations were completed in July 2012, and the produced water, along with all associated waste, was completely removed in August 2012. It would have been useful for the reporter to verify when Mr. Latkanich's photos were taken. The context of the timing is key.

Protecting people and the environment is one of our company's core values, and it's a story we would be glad to tell. We also would guide you to trade groups such as the Marcellus Shale Coalition for a fuller portrayal of our industry.

We look forward to learning your response to our concerns.

Veronica Flores-Paniagua

External Affairs Advisor

Policy, Government and Public Affairs

Chevron North America E&P

1400 Smith Street, Office 49095

Houston, TX 77002

P: 713-372-0063

C: 713-213-3082

VFloresPaniagua@chevron.com

@vxflores

From: Ordonez, Isabel I[/O=CHEVRON/OU=AG01/CN=RECIPIENTS/CN=EOJC]
Sent: Thur 11/16/2017 1:16:13 AM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Subject: RE: final draft of response - also sending to lawyer

Much better. Please ask the lawyer and Trip to read it carefully. Ask them if the consultancy can read it as well. Even if it takes us one more day, it will be good to do it.

Isabel Ordóñez

Upstream Senior External Affairs Advisor

Policy, Government and Public Affairs

Chevron Corporation

1400 Smith Street, Office 49098

Houston, TX 77002

P: 713-372-1841

C: 713-380-9296

isabel.ordonez@chevron.com

@IOrdonezChevron

From: Flores-Paniagua, Veronica

Sent: Wednesday, November 15, 2017 7:13 PM

To: Ordonez, Isabel I <isabel.ordonez@chevron.com>

Subject: final draft of response - also sending to lawyer

Hi, Jon.

Thanks again for taking the time to call. As I mentioned, we have several concerns about the fracking story by Scott Tong that aired yesterday. Above all, we're troubled that Mr. Tong did not contact us for the story, if not for balance, for important context that could have benefitted his reporting and development of his story. To that end, we are requesting publication and broadcast of the following clarifications to balance the coverage.

Chevron takes public health very seriously and one of our top priorities is to protect the environment and the community. While we respect Mr. Latkanich's right to air his concerns, we also believe it is important that any news story accurately portrays the facts.

Missing from the story is the fact that in 2013, Chevron Appalachia and the Pennsylvania Department of Environmental Protection ("DEP") investigated concerns previously raised by Mr. Latkanich regarding the quality of his well water. Based on a review of the 2011 pre-drill and 2013 post-drill water samples, both Chevron and the DEP concluded that Chevron Appalachia's operations did not affect Mr. Latkanich's water.

Mr. Tong's story also contains several inaccuracies, one of them right at the start. The story states that Mr. Latkanich sold Chevron the right to drill on his property seven years ago. The lease allowing drilling on his land originated with Atlas Energy, which Chevron later acquired.

The story also states: "The state found that Chevron illegally dumped frack water on his property." The statement is inaccurate and should be corrected. The state's notice of violation dated January 8, 2013, says no such thing. What the state's notice describes is related to the company's work to remove accumulated rainwater from the drilling site as part of the reclaiming process – that is, the company was in the process of returning the site to its original state because active operations had been completed on the well pad. Chevron took corrective action immediately upon learning of the DEP's concerns about the rainwater. Pumping was stopped, and the remaining rainwater was hauled out by water truck. Chevron's testing of the rainwater being pumped out of the site, as reported to the state, found it to be well within state standards for discharge requirements under Chapter 78.60.

Additionally, the story states that Mr. Latkanich "thinks fracking chemicals that were shot down the gas well and came back up were stored in a pit on his property that wasn't lined (as it was supposed to be) to prevent leaking. Latkanich brought out pictures that he says show this. He said maybe the liner was pulled out."

Our standard operating process for our drilling sites requires us to adhere to state and federal

environmental regulations, and this includes use of a liner in the containment area used to hold produced water. The only time that the containment area would have been unlined is after operations had been completed on the well pad, and the produced water, along with all associated waste, was completely removed. In the case of the drilling site on Mr. Latkanich's property, operations were completed in July 2012, and the produced water, along with all associated waste, was completely removed in August 2012. It would have been useful for the reporter to verify when Mr. Latkanich's photos were taken. The context of the timing is key.

Protecting people and the environment is one of our company's core values, and it's a story we would be glad to tell. We also would guide you to trade groups such as the Marcellus Shale Coalition for a fuller portrayal of our industry.

We look forward to learning your response to our concerns.

Veronica Flores-Paniagua

External Affairs Advisor

Policy, Government and Public Affairs

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1400 Smith Street, Office 49095

Houston, TX 77002

P: 713-372-0063

C: 713-213-3082

VFloresPaniagua@chevron.com

@vxflores

From: Jacobson, Lindsey (NBCUniversal)[Lindsey.Jacobson@nbcuni.com]
Sent: Thur 12/12/2019 3:43:35 PM (UTC)
To: Crinklaw, Morgan J[Morgan.Crinklaw@chevron.com]; Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Cc: Hadavi, Tala (NBCUniversal)[Tala.Hadavi@nbcuni.com]
Subject: **[**EXTERNAL**]** Re: [EXTERNAL] Seeking a Conversation

Hi Morgan and Veronica,

I hope this note finds you well. We're moving forward with our piece about energy independence. As you know, we spoke with one of your leaseholders, Bryan Latkanich. The only time we mention Chevron is in the context of his case. I'm reaching out for final comment from Chevron in time for our deadline of 12/18. We will consider Morgan's note below as the answer to the majority of our questions. However, we have one remaining question about the offer Chevron made to Mr. Latkanich:

Bryan told CNBC that Chevron offered him \$520,000 to compensate him for the damages to his property (without an admission of wrongdoing), as partly reported by the [Pittsburgh Gazette](#). He says he has asked for \$670,000. Is this accurate? And if so, where are you in those negotiations?

As I mentioned before, we have removed any footage or any part of the interview we shot with you in PA. Please feel free to reach out with any questions. Again, the deadline to submit this project is 12/18. I hope to hear from you soon.

Sincerely,

Lindsey

From: "Angelova, Kamelia (NBCUniversal)" <Kamelia.Angelova@nbcuni.com>
Date: Thursday, September 19, 2019 at 11:54 AM
To: "Crinklaw, Morgan J" <Morgan.Crinklaw@chevron.com>, "Flores-Paniagua, Veronica" <VFloresPaniagua@chevron.com>
Cc: "Hadavi, Tala (NBCUniversal)" <Tala.Hadavi@nbcuni.com>, "Jacobson, Lindsey (NBCUniversal)" <Lindsey.Jacobson@nbcuni.com>
Subject: Re: [EXTERNAL] Seeking a Conversation

Hi Morgan,

Thank you for reaching out. I am adding your colleague, Veronica Flores-Paniagua, who has been aware of this story for months. Tala has been in constant contact with her.

I also personally reached out to Veronica in good faith on August 21 to assure her that we want to work with Chevron. While we disagreed with Chevron's statements that we came to your facilities to shoot for a completely different story, we decided not to use any sound or footage from that visit in this because we want to be good partners. We asked to talk to someone from company on issues we were reporting on but we didn't hear back.

In the meantime, Veronica gave a comment to The Pittsburgh Gazette on a story about Bryan: <https://newsinteractive.post-gazette.com/fracking-and-health-2/>
Our questions for Chevron are not any different than the Gazette's. We were baffled that Chevron chose to comment to the Gazette on the same issues we were seeking comments on at the same time, and

while we were being cooperative and good partners.

We are checking, if we have permission to share the toxicology report with you as it is a confidential medical record.

My producers have done diligent reporting, the piece has gone through multiple layers of review, and we are confident in the story we are telling. We are explaining the various sides of the story and we would love to be able to tell your Chevron's side as well.

I am happy to jump on a call with you. I will follow up with some options for Friday or Monday morning.

Many thanks.

-Kamelia

From: "Crinklaw, Morgan J" <Morgan.Crinklaw@chevron.com>
Date: Wednesday, September 18, 2019 at 10:09 PM
To: "Angelova, Kamelia (NBCUniversal)" <Kamelia.Angelova@nbcuni.com>
Cc: "Hadavi, Tala (NBCUniversal)" <Tala.Hadavi@nbcuni.com>, "Jacobson, Lindsey (NBCUniversal)" <Lindsey.Jacobson@nbcuni.com>
Subject: [EXTERNAL] Seeking a Conversation

Hi Kamelia –

It has come to my attention that CNBC is knowingly producing a story that advances claims against Chevron that are not substantiated. Given Chevron's long-standing relationship with CNBC, we find this troubling and would appreciate the opportunity to discuss the issue with you by phone or in person at your convenience.

In short, CNBC producers Tala Hadavi and Lindsey Jacobson (copied here) have informed us that they are advancing the second part of a series related to shale in the United States. As part of that second installment, they plan to include unsubstantiated claims by a landowner that Chevron's operations have polluted his drinking water, causing adverse health effects for his family.

We take issues relating to our operations and the communities where we operate seriously. That's why both Chevron Appalachia and the Pennsylvania Department of Environmental Protection (DEP) have thoroughly investigated this landowner's claims. The Pennsylvania DEP analyzed the landowner's water seven times between April 2013 and March 2019 and determined that the landowner's water supply was "not adversely affected by oil and gas activities, including but not limited to drilling, alteration, or operation of an oil or gas well."

Given the fact there is no evidence to support these serious claims and that DEP has affirmatively determined otherwise, the landowner's claims of contamination and health effects should not be included in the series.

It is troubling that despite knowing this information, CNBC's producers not only continue to include it in their story, but press Chevron to disprove the allegations. The producers have also asked us to comment on a toxicology report, which Chevron has not seen. According to media reports, the toxicology report does not conclude that Chevron's operations have impacted the landowner's drinking water or health. In fact, CNBC's producers stated that they have not spoken to the author of the report, yet are seeking a comment from Chevron on its findings.

Again, given Chevron's long-standing relationship with CNBC, we would appreciate the opportunity to discuss these and other concerns with you by phone or in person at your convenience.

Thank you in advance for your attention to this matter. I look forward to hearing from you.

Best,

Morgan

Morgan Crinklaw

Manager, Upstream External Affairs

Corporate Affairs

Chevron Corporation

6001 Bollinger Canyon Rd., G2180

San Ramon, CA 94583

Office: 925-842-4204

Cell: 925-336-6415

Follow me: @mjcrinklaw

From: Oliver, Trip[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=19E305C669B74D65A21ECFDD3DD6A9C1-KDRD]
Sent: Mon 9/30/2019 11:09:49 PM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Subject: RE: **[**EXTERNAL**]** RE: [EXTERNAL] Re: RE: CNBC Part 1

Thanks Veronica. Let's discuss tomorrow.

From: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Sent: Monday, September 30, 2019 5:10 PM
To: Oliver, Trip <TripOliver@chevron.com>; Sieving, Jan <jansieving@chevron.com>; Calvert, Nathan <nscalvert@chevron.com>
Subject: RE: **[**EXTERNAL**]** RE: [EXTERNAL] Re: RE: CNBC Part 1

Hi, Trip.

I have a couple of reflections, all open to discussion. As far as I know, it's not been a practice on our social media channels to react to inaccurate or misleading media coverage of the company. My sense is that using the CVX social media channels, as the plan proposes, is too big of a stick. If AMBU had its own channels, I think those would be more appropriate platforms. And even then, great care would have to be taken that we don't come across as vigilante avengers. Corp digital could then consider whether to support/amplify any of the messages.

As to the ads about CVX SI, my concern would be that we're "protesting too loudly," and then this, in turn, would inadvertently amplify the perception that we did something wrong with regard to Bryan Latkanich.

I think we need to continue leveraging MSC where we can, and perhaps consider how we can financially support proactive pro-industry messaging in the AMBU market in the meantime.

Glad to talk through any of this.

Best,
Veronica

From: Oliver, Trip <TripOliver@chevron.com>
Sent: Monday, September 30, 2019 4:32 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>; Sieving, Jan <jansieving@chevron.com>; Calvert, Nathan <nscalvert@chevron.com>
Subject: RE: **[**EXTERNAL**]** RE: [EXTERNAL] Re: RE: CNBC Part 1

Have you all had a chance to look at this proposal. If so, please give me your thoughts on this approach and whether we ought to consider it in response to any CNBC story. Thanks.

From: Oliver, Trip
Sent: Wednesday, September 25, 2019 5:57 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>; Sieving, Jan <jansieving@chevron.com>; Calvert, Nathan <nscalvert@chevron.com>
Subject: Fwd: **[**EXTERNAL**]** RE: [EXTERNAL] Re: RE: CNBC Part 1

Attached is a proposal from FTI to respond to the CNBC piece. This represents a “kitchen sink” approach to this, which explains the high price tag. We obviously can choose some, all or none of these ideas. Please take a look at the attached and send me your thoughts. Thanks.

Sent from my iPhone
Begin forwarded message:

From: "Sutter, John" <John.Sutter@fticonsulting.com>
Date: September 25, 2019 at 5:25:07 PM EDT
To: "Oliver, Trip" <TripOliver@chevron.com>
Cc: "Windle, Travis" <Travis.Windle@fticonsulting.com>
Subject: **[**EXTERNAL**] RE: [EXTERNAL] Re: RE: CNBC Part 1**

Trip – We compiled the digital strategy ideas we’ve discussed over the past few days into the attached memo. This is the most robust of what we’ve discussed – leveraging EID, MSC and CVX platforms to fully saturate the market with our messages.

Looking forward to your feedback and happy to answer any question or provide more details, as needed.

Thanks
John

From: Windle, Travis <Travis.Windle@fticonsulting.com>
Sent: Tuesday, September 24, 2019 7:09 PM
To: Oliver, Trip <TripOliver@chevron.com>
Cc: Sutter, John <John.Sutter@fticonsulting.com>
Subject: Re: [EXTERNAL] Re: RE: CNBC Part 1

No problem, Trip - we’ll pull something together right away.
On Sep 24, 2019, at 6:05 PM, Oliver, Trip <TripOliver@chevron.com> wrote:

Thanks John. I think putting these various options down on paper would be very helpful.

Sent from my iPhone
On Sep 24, 2019, at 5:55 PM, Sutter, John <John.Sutter@fticonsulting.com> wrote:

Trip – An additional idea (which builds on the EID pre-roll + digital ads idea) to expand the reach and create the echo chamber would be to launch direct CVX ads (pre-roll & via the CVX CR Stories platform) and MSC digital ads. The CR story content can focus on the social engagements and STEM investments in the region – and, since the ads would be targeted to just western Pa./WV panhandle, only our key demographic would see the posts. Then we could run MSC digital ads focused on the industry’s commitment to health, safety and environmental protection. Goal here is to cost-effectively flood the zone with targeted content – some company branded, others trade association branded – that further isolates Latkanich’s story as an outlier.

Know we’ve talked about a number of different options over the phone. Happy to adjust that memo we sent over last month with specific details around these plans if that’s helpful.

Thanks
John

From: Sutter, John
Sent: Tuesday, September 24, 2019 1:46 PM
To: Oliver, Trip <TripOliver@chevron.com>
Cc: Windle, Travis (Travis.Windle@fticonsulting.com)
<Travis.Windle@fticonsulting.com>
Subject: RE: CNBC Part 1

Hey, Trip – That's right – the ad that runs right before the documentary are the pre-roll ads. They typically run each time a new viewer watches the video. Combine the pre-roll ads (to catch all the first time viewers) with some targeted social buys (viewer sees the documentary and then continues to see display ads / social ads on the topic) and we'll cover a pretty large swath of our intended audience.

Let us know if you'd like us to sharpen the pencil and reach out to CNBC's advertising team to gather a specific budget for the pre-roll spots.

From: Oliver, Trip <TripOliver@chevron.com>
Sent: Tuesday, September 24, 2019 1:38 PM
To: Sutter, John <John.Sutter@fticonsulting.com>
Subject: [EXTERNAL] FW: CNBC Part 1

John,

Just looking at this video, there was some brokerage ad that played for 10 seconds before the piece started. Is that what you are referring to? By the way, when I went back to watch it again, the ad no longer played.

From: Calvert, Nathan <ncalvert@chevron.com>
Sent: Monday, June 17, 2019 3:22 PM
To: Oliver, Trip <TripOliver@chevron.com>
Subject: CNBC Part 1

<https://www.cnbc.com/2019/06/14/how-the-us-lost-its-energy-independence-to-the-middle-east.html>

Nate

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From: Robertson, Kent S[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=580473328DBF495D9B6000D5B26D4468-KRDQ]
Sent: Wed 7/24/2019 3:33:12 PM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Cc: Crinklaw, Morgan J[Morgan.Crinklaw@chevron.com]
Subject: Re: CNBC

OK, thanks. Will revisit.

Kent Robertson
Manager, Global External Affairs
Policy, Government and Public Affairs
Chevron Corporation
6001 Bollinger Canyon Road
San Ramon, CA 94583-2324
ph: 925-842-1456
mobile: 925-858-4289
krdq@chevron.com

On Jul 24, 2019, at 8:31 AM, Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com> wrote:

Here's some of that new CNBC "objectivity" in action. The man in the picture is our AMBU leaseholder.

From: Sutter, John <John.Sutter@fticonsulting.com>
Sent: Wednesday, July 24, 2019 10:16 AM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>; Windle, Travis <Travis.Windle@fticonsulting.com>; Oliver, Trip <TripOliver@chevron.com>
Subject: [**EXTERNAL**] RE: CNBC

You all may have already seen this, Veronica & Trip, but Tala's Twitter profile picture is of her with Latkanich.

<https://twitter.com/talahadavi?lang=en>

<image001.png>

From: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Sent: Wednesday, July 24, 2019 10:30 AM
To: Windle, Travis <Travis.Windle@fticonsulting.com>; Oliver, Trip <TripOliver@chevron.com>
Cc: Sutter, John <John.Sutter@fticonsulting.com>
Subject: [EXTERNAL] RE: CNBC

Thanks for the initiative, Travis. Yes, I like this approach. Please let us know what you learn.

From: Windle, Travis <Travis.Windle@fticonsulting.com>
Sent: Wednesday, July 24, 2019 8:09 AM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>; Oliver, Trip <TripOliver@chevron.com>
Cc: Sutter, John <john.sutter@fticonsulting.com>

Subject: [**EXTERNAL**] RE: CNBC

Another thought: we could reach out to Tala proactively -- "hey, we support MSC's media affairs efforts and understand you're in the area. What are you working on specifically and how can help" -- to try to tease out some additional info on her current direction and determine how we may want to engage her from there. Please advise.

From: Windle, Travis
Sent: Monday, July 22, 2019 4:21 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>; Oliver, Trip <TripOliver@chevron.com>
Cc: Sutter, John <John.Sutter@fticonsulting.com>
Subject: RE: CNBC

You bet. Bit more: Tala and their crew are on the ground and filming most of the week. The Weds. morning (11am-ish) interview with Diana will take place somewhere in Southpointe. That's what we know at the moment.

From: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Sent: Monday, July 22, 2019 11:57 AM
To: Windle, Travis <Travis.Windle@fticonsulting.com>; Oliver, Trip <TripOliver@chevron.com>
Cc: Sutter, John <John.Sutter@fticonsulting.com>
Subject: [EXTERNAL] RE: CNBC

Thanks, Travis. We've not heard anymore from Tala, so I eagerly await more info.

From: Windle, Travis <Travis.Windle@fticonsulting.com>
Sent: Monday, July 22, 2019 10:22 AM
To: Oliver, Trip <TripOliver@chevron.com>; Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Cc: Sutter, John <john.sutter@fticonsulting.com>
Subject: [**EXTERNAL**] CNBC

You all may already know this, but we understand that Tala has reached out to Wash. Co. commissioner Diana Irey Vaughan about doing an on-camera interview. Will share more as I know it. Thanks.

Travis J. Windle
Sr. Managing Director
Energy & Natural Resources | Strategic Communications

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Sent: Wed 8/21/2019 3:57:03 PM (UTC)
To: Robertson, Kent S[KRDQ@chevron.com]
Cc: Crinklaw, Morgan J[Morgan.Crinklaw@chevron.com]
Subject: RE: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Got it. I looped in the BU. They'd like us to consider responding as follows:

- Mr. Latkanich has repeatedly made unfounded claims about Chevron in the media and to the Pennsylvania Department of Environmental Protection (DEP).
- The DEP has tested Mr. Latkanich's water multiple times since 2013 and has consistently determined that Chevron's activities had no adverse effect on the quality of his water, including most recently in a letter dated June 4, 2019.
- In addition, as he disclosed in a 2017 interview with *Inside Climate News*, Mr. Latkanich and his son have both had a history of serious health problems since well before any Chevron activity on his property.
- While we respect Mr. Latkanich's right to make his concerns known, we believe that any news story conveying those concerns should accurately report the facts.

From: Robertson, Kent S <KRDQ@chevron.com>
Sent: Wednesday, August 21, 2019 10:31 AM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Cc: Crinklaw, Morgan J <Morgan.Crinklaw@chevron.com>
Subject: RE: [EXTERNAL] RE: CNBC documentary about Shale Revolution

I'm stuck on calls for at least another 45 minutes. Can follow-up afterwards but have another call at noon your time. Please don't reply until the three of us have spoken.

Kent Robertson
Manager, Global External Affairs
Policy, Government and Public Affairs
Chevron Corporation
6001 Bollinger Canyon Road
San Ramon, CA 94583-2324
ph: 925-842-1456
mobile: 925-858-4289
krdq@chevron.com

From: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Sent: Wednesday, August 21, 2019 8:27 AM
To: Robertson, Kent S <KRDQ@chevron.com>
Cc: Crinklaw, Morgan J <Morgan.Crinklaw@chevron.com>
Subject: FW: [EXTERNAL] RE: CNBC documentary about Shale Revolution

FYI....Tala just sent this. My comments follow the questions.

From: Hadavi, Tala (NBCUniversal) <Tala.Hadavi@nbcuni.com>
Sent: Wednesday, August 21, 2019 10:18 AM
To: Angelova, Kamelia (NBCUniversal) <Kamelia.Angelova@nbcuni.com>; Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Subject: [**EXTERNAL**] Re: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Hi Veronica,

As Kamelia mentioned, we are not including any of the footage we shot or the interview we conducted with Stacy Olsen in the piece. But would love some comments to the following:

1. I interviewed Washington Commissioner Diana Vaughan for the piece and she spoke about jobs and funds invested in the area in general. I would love some numbers on total jobs created and economic growth that Chevron has contributed to in the region? This is an industry question that should be directed to Marcellus Shale Coalition.
2. What are some community initiatives you're currently doing in the area? Stacey addressed in May.
3. How are you addressing or viewing the health concerns of the communities in PA (such as water and land contamination) as a company? Stacey addressed in May.
4. Brian Latkanich, one of your leaseholders in Washington County, has concerns about water contamination to his property. Could you please comment on that? CNBC should talk to the state DEP about its findings.
5. Allegedly, some of the oversight with casing led to flooding and damaging of his property. Do you have a comment on that? This question makes absolutely no sense.
6. His water tests show that the levels of Bromide, sodium, chloride, turbidity and TDS increased (or were present) from the time of the pre-drill. What are your thoughts about that? CNBC should talk to the state about its findings.
7. Also, his son's toxicology report show a link between his health concerns and the gas drilling. Could you comment please. Refer again back to the state.

As Kamelia mentioned, the piece is publishing on Friday. We kindly ask that we have the responses by tomorrow early afternoon latest so that I can include in the piece.

Again, I look forward to hearing from you and please don't hesitate to call me if you have any questions.

Best,
Tala

Tala Hadavi
Producer | Markets & Politics
900 Sylvan Ave.
Englewood Cliffs, NJ 07632
(o) 201-735-4818
(c) 201-220-3043

From: "Angelova, Kamelia (NBCUniversal)" <Kamelia.Angelova@nbcuni.com>
Date: Wednesday, August 21, 2019 at 9:00 AM
To: "Hadavi, Tala (NBCUniversal)" <Tala.Hadavi@nbcuni.com>, "Flores-Paniagua, Veronica" <VFloresPaniagua@chevron.com>

Subject: Re: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Hi Veronica,

I am the executive producer of CNBC Digital. I know you had concerns about using the footage Tala captured during her tag-along with Tom DiChristopher a few months back.

The story of the Shale Revolution and the road to U.S. energy independence includes many voices and sides, and Chevron is, of course, a part of that. The story, as other story often would, evolved through all the reporting and interviews we've done. While we disagree that we mislead you in any way, we want to be good partners and we are not going to use any of the footage and sound Tala filmed on her visit.

We hope that you give us the opportunity to comment on our questions for this piece, tells us about all the jobs and positive initiatives Chevron has created, and address the concerns of the community as well.

Tala will follow up with questions. The piece is going to be published on Friday.

Many thanks for your help and consideration.

Best,

Kamelia

From: "Hadavi, Tala (NBCUniversal)" <Tala.Hadavi@nbcuni.com>
Date: Friday, August 16, 2019 at 7:09 PM
To: "Flores-Paniagua, Veronica" <VFloresPaniagua@chevron.com>
Cc: "Angelova, Kamelia (NBCUniversal)" <Kamelia.Angelova@nbcuni.com>
Subject: Re: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Hi Veronica, following up on our correspondence. We think it would be important to include the perspective of Chevron in our piece and therefore would love to interview someone in regards to this. Please let me know when you get a chance.

Thank you in advance.

Best,
Tala

On Aug 15, 2019, at 11:21 AM, Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com> wrote:

Hi, Tala.

Thank you for your email, Tala. Are you still planning to develop the story your team pitched to visit our facilities in Washington County? This angle doesn't sound like the story scope that was described to us at the outset of that engagement. I'm glad to discuss if you'd like to call me. I'm in meetings from through 11 a.m. Central time, but can talk later.

Best,
Veronica

Veronica Flores-Paniagua
External Affairs Advisor
Corporate Affairs
Chevron North America E&P

1400 Smith Street, Office 49098
Houston, TX 77002
P: 713-372-0063
C: 713-213-3082
VFloresPaniagua@chevron.com
@vxflores

From: Hadavi, Tala (NBCUniversal) <Tala.Hadavi@nbcuni.com>
Sent: Wednesday, August 14, 2019 4:07 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Cc: Angelova, Kamelia (NBCUniversal) <Kamelia.Angelova@nbcuni.com>
Subject: [**EXTERNAL**] CNBC documentary about Shale Revolution

Hi Veronica,

I hope this note finds you well. As you know, I have been working on a series about U.S. Energy. The second piece, about the shale revolution, will be published next week. It profiles farmers and lease holders in Pennsylvania, one of whom is one of your leaseholders, Bryan Latkanich. I am reaching out because we'd love to interview someone from Chevron about your business relationship with Bryan.

We are hoping to have a response from you within the next 24hrs. I look forward to hearing from you.

Best,
Tala

Tala Hadavi
Producer | Markets & Politics
900 Sylvan Ave.
Englewood Cliffs, NJ 07632
(o) 201-735-4818
(c) 201-220-3043

Sent: Mon 10/21/2019 8:49:46 PM (UTC)
To: Oliver, Trip[TripOliver@chevron.com]; Raines, Robert S[robertr@chevron.com]
Cc: Sieving, Jan[jansieving@chevron.com]; Miller, Joseph[Joseph.Miller@chevron.com]
Subject: RE: Trump visit to Pittsburgh

It seems it was re-posted. I have a digital subscription to the PG and have not seen this in that edition. Google indicates it was posted 6 days ago.

From: Oliver, Trip <TripOliver@chevron.com>
Sent: Monday, October 21, 2019 3:45 PM
To: Raines, Robert S <robertr@chevron.com>
Cc: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>; Sieving, Jan <jansieving@chevron.com>; Miller, Joseph <Joseph.Miller@chevron.com>
Subject: RE: Trump visit to Pittsburgh

Robert,

Even more curious, this headline never appeared online in the Post-Gazette. It only appeared in the print version of the story. This piece was part of a larger online story (see below at the bottom of the story). The Post-Gazette decided to run part of the larger story in its Sunday edition. It then pulled the Chevron piece out and gave it its own headline and story in the Monday edition of the paper. However, until this the Chevron headline was never available online. Something happened recently that made it available online.

<https://newsinteractive.post-gazette.com/fracking-and-health-2/>

From: Raines, Robert S <robertr@chevron.com>
Sent: Monday, October 21, 2019 4:26 PM
To: Oliver, Trip <TripOliver@chevron.com>
Cc: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>; Sieving, Jan <jansieving@chevron.com>; Miller, Joseph <Joseph.Miller@chevron.com>
Subject: RE: Trump visit to Pittsburgh

Interesting! I just searched Google for Bryan Latkanich. It stuck in today's date, so that's why I thought it was recent.

<https://www.google.com/search?q=bryan+latkanich>

From: Oliver, Trip <TripOliver@chevron.com>
Sent: Monday, October 21, 2019 1:17 PM
To: Raines, Robert S <robertr@chevron.com>
Cc: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>; Sieving, Jan <jansieving@chevron.com>; Miller, Joseph <Joseph.Miller@chevron.com>
Subject: RE: Trump visit to Pittsburgh

Robert,

That is the same article the PG ran in July. How did you find this?

From: Raines, Robert S <robertr@chevron.com>
Sent: Monday, October 21, 2019 4:14 PM
To: Oliver, Trip <TripOliver@chevron.com>
Cc: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>; Sieving, Jan <jansieving@chevron.com>; Miller, Joseph <Joseph.Miller@chevron.com>
Subject: RE: Trump visit to Pittsburgh

Trip –

Looks like this article featuring Bryan Latkanich popped up yesterday or today: <https://pge.post-gazette.com/.pf/print/133059/3/201906190135>

Robert

From: Raines, Robert S
Sent: Thursday, October 17, 2019 3:01 PM
To: Oliver, Trip <TripOliver@chevron.com>
Cc: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>; Sieving, Jan <jansieving@chevron.com>; Miller, Joseph <Joseph.Miller@chevron.com>
Subject: RE: Trump visit to Pittsburgh

Trip –

Joe's out until Tuesday, but here's what I found today...

There is already an activist protest planned around the conference (looks like a single event so far):

<https://nopetropa.com/2019/10/16/trump-to-visit-pittsburgh-shale-gas-conference-on-oct-23-activists-to-march-at-1-p-m/>

<https://www.facebook.com/events/533268290770463/>

<https://breatheproject.org/event/shale-insight-conference-march-and-rally/>

Nothing about Bryan Latkanich right now. Will continue to monitor.

Robert

From: Oliver, Trip <TripOliver@chevron.com>
Sent: Thursday, October 17, 2019 2:04 PM
To: Miller, Joseph <Joseph.Miller@chevron.com>
Cc: Raines, Robert S <robertr@chevron.com>; Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>; Sieving, Jan <jansieving@chevron.com>
Subject: Trump visit to Pittsburgh

Joe,

Donald Trump is coming to Pittsburgh to speak to the Shale Insight Conference on Wednesday, October 23. Please monitor any anti-O&G activist social media chatter around this event for any indication of planned activities. In addition, please track any traffic around this event about health claims, Chevron and Bryan Latkanich. CNBC.com has been working on a story about Bryan Latakanich, one of our leaseholders, and his complaints about Chevron. I am concerned that they could choose to run this piece to coincide with the Trump visit. Thanks.

Trip Oliver

Manager

Government and Public Affairs

Appalachian Mountain Business Unit

Corporate Affairs

Chevron North America Exploration and Production Company

a division of Chevron U.S.A. Inc.

700 Cherrington Parkway

Coraopolis, PA 15108

Tel 412 865 1455

From: Sieving, Jan[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B059B118C98C46368BF42CA5067C742B-JSWS]
Sent: Tue 12/17/2019 1:17:11 AM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Subject: RE: CNBC and Chevron

Another thought... this Energy in Depth blog does a great job rebutting the PPG articles and mentions the piece from Inside Climate News about Ryan Latkanich's being born to a drug addicted mother.

Should we consider forwarding this to Lindsay/Tala as an FYI.

July 26: [Post-Gazette Continues to Peddle Junk Science](#)

No shortage of ideas!

Jan

From: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Sent: Monday, December 16, 2019 5:00 PM
To: Robert Mead <robert.mead@teneo.com>
Cc: Sieving, Jan <jansieving@chevron.com>
Subject: CNBC and Chevron

Hi, Robert. Thanks for taking the time to talk with us this afternoon. The attached email is what Morgan sent to another dotcom producer, Kamelia Angelova, as a followup to a conversation he and I had with producers Lindsey Jacobson and Tala Hadavi. Before we spoke with you, our game plan had been to respond to the latest email from CNBC and advance Morgan's complaints, particularly around the use of the toxicology report. But as I believe we covered this afternoon, this approach likely would result in an unproductive tit-for-tat exchange.

We're mindful of your guidance that an intervention at the highest levels might not have the desired result and, instead, could further inflame the situation. So here's where we've landed:

To the current email exchange – one in which the CNBC.com executive producer shares that they will, indeed, refer to the toxicology report – we would like to respond with the following via email:

We strongly advise that CNBC reconsider airing this story. The angle as you have presented to Chevron is based on false claims. We would be glad to talk with you by phone to provide additional context we believe you don't have about our business relationship with Bryan Latkanich. The conversation we're seeking would be on background/off the record.

The conversation would be guided on our end by the messaging in the attached document. If we are not successful with the pushback, or even if they soften but still press forward, we will ask them for the opportunity to respond on camera. We're checking with the business unit to be sure they're OK with this path.

We look forward to learning your feedback.

Best,
Veronica

Veronica Flores-Paniagua
External Affairs Advisor
Corporate Affairs
Chevron North America E&P

1400 Smith Street, Office 49098
Houston, TX 77002
P: 713-372-0063
C: 713-213-3082
VFloresPaniagua@chevron.com
[@vxflores](mailto:vxflores)

From: Jacobson, Lindsey (NBCUniversal)[Lindsey.Jacobson@nbcuni.com]
Sent: Wed 12/18/2019 9:43:51 PM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Cc: Hadavi, Tala (NBCUniversal)[Tala.Hadavi@nbcuni.com]
Subject: **[**EXTERNAL**]** Re: [EXTERNAL] Chevron inquiry

Thank you, Veronica.

From: "Flores-Paniagua, Veronica" <VFloresPaniagua@chevron.com>
Date: Wednesday, December 18, 2019 at 3:39 PM
To: "Jacobson, Lindsey (NBCUniversal)" <Lindsey.Jacobson@nbcuni.com>
Cc: "Hadavi, Tala (NBCUniversal)" <Tala.Hadavi@nbcuni.com>
Subject: [EXTERNAL] Chevron inquiry

Lindsey,

We again strongly advise that CNBC.com reconsider publishing this story. The angle as you have presented to Chevron is based on false, misleading and discredited claims. Most troubling of all is your decision to refer to the toxicology report, which Mr. Latkanich has only made available to news outlets but which we have not been allowed to see. If you aren't able to provide us a copy, you should not use it as a source.

Please see our responses below:

- **Bryan Latkanich alleges that the gas drilling on his property adversely affected his water source. His water tests show that the levels of Bromide, sodium, chloride, turbidity and TDS increased (or were present) from the time of the pre-drill. What are your thoughts about that?**
 - Results of extensive water tests by the Pennsylvania Department of Environmental Protection *clearly and repeatedly* demonstrate that Mr. Latkanich's water quality is about the same now as before the wells were drilled and the chemical composition of his water is distinctly different than the water from our operations.
- **He also believes that the water runoff from improper casing (in addition to precipitation) caused damage to his property. Could you please comment on that?**
 - Regarding the assertion about "improper casing," this is a completely false and baseless claim. We encourage you to substantiate this claim.
 - An independent inspection of the wall showed the damage began before 2013 and resulted from inadequate buttressing of the long cinder block wall during construction of this house *before* Chevron initiated activities on his property.
- **You received two citations by the Pennsylvania Department of Environmental Protection in relation to the incident from 2012. Could you please comment?**
 - As CNBC.com can easily verify with the DEP, the state's January 8, 2013 notice of violation (NOV) is related to the company's work to remove accumulated rainwater from the drilling site during the reclaiming process. The company was restoring the site after active operations had been completed on the well pad located on Mr. Latkanich's property. Immediately upon learning of the DEP's concerns, Chevron stopped pumping the rainwater, and the remaining rainwater was hauled out by truck. Chevron's testing of the rainwater, as reported to the state and, again, which

CNBC.com can easily verify with the DEP, found it to be within state standards for discharge requirements under Chapter 78.60.

• **Bryan's son Ryan's toxicology report indicates that his health problems are a result of gas drilling, could you please comment?**

- We strenuously object to your use of Dr. Abesamis' report in your story. The toxicology report does not and cannot prove exposure or causation of health issues. In paraphrasing the toxicology report, a recent news article inaccurately concluded that "hydraulic fracturing exposure" was the cause of Ryan Latkanich's health problems. Although we have not been allowed to view the report that Mr. Latkanich has made available only to the media, the direct quotes from Dr. Abesamis' report in that article do not support that conclusion.

• **Lastly, Bryan has said that you offered him \$520,000 to compensate him for the damages to his property (without admitting to wrongdoing), as partly reported by the Pittsburgh Gazette. He says he has asked for \$670,000. Is this accurate? And if so, where are you in those negotiations?**

- We have worked with Mr. Latkanich in good faith for six years to finish grading the land on the well site as required by our permit. Mr. Latkanich has refused access to his property for this work even though it is allowed by the terms of his lease. Nevertheless, Mr. Latkanich has accepted and cashed monthly royalty payments from Chevron.
- Over the past six years, Mr. Latkanich has made outrageous demands for payment from Chevron for property claims, but not once has he asked us for compensation for any alleged health claims. Nor has he ever pursued any legal action against Chevron.
- While we are not responsible for Mr. Latkanich's water nor his house foundation issues, we have sought to reach an amicable resolution with him to achieve compliance with our permits.
 - We offered to pay a professional mediator of his choice to help us reach a mutually agreeable resolution. He declined.
 - We offered to buy his property outright for above fair market value (\$520,000). He declined and asked for \$2.5 million.
 - We offered a goodwill payment (\$170,000) to access the property to conduct the restoration work. He declined and demanded \$670,000.
 - We then offered to buy his property for \$670,000, which he declined.

You also should know that, having exhausted all reasonable options to resolve this issue and achieve regulatory compliance, we have made the business decision to permanently seal the two Latkanich wells, remove our equipment from his property and restore the site to its approximate original contours. (This process is known in the industry as "plugging and abandoning" the wells.) Mr. Latkanich has indicated his support, but is still demanding payment.

Chevron takes public health very seriously, and one of our top priorities is to protect the environment and the community. While we respect Mr. Latkanich's right to air his concerns, we also believe it is important and incumbent upon CNBC's journalistic integrity to ensure that your story accurately portrays the facts.

Thank you for your attention.

Veronica Flores-Paniagua
External Affairs Advisor
Corporate Affairs
Chevron North America E&P

1400 Smith Street, Office 49098
Houston, TX 77002
P: 713-372-0063
C: 713-213-3082
VFloresPaniagua@chevron.com
[@vxflores](mailto:vxflores)

From: Sutter, John[John.Sutter@fticonsulting.com]
Sent: Mon 3/1/2021 4:05:17 PM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Cc: Windle, Travis[Travis.Windle@fticonsulting.com]
Subject: **[**EXTERNAL**]** RE: [EXTERNAL] update on EHN "study"

Sounds great. My cell is best – 412-427-7611

Talk soon

John

From: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Sent: Monday, March 1, 2021 11:05 AM
To: Sutter, John <John.Sutter@fticonsulting.com>
Cc: Windle, Travis <Travis.Windle@fticonsulting.com>
Subject: RE: [EXTERNAL] update on EHN "study"

Hi, John. Good to hear from you. I hadn't seen this yet. Thanks so much for sharing. Yes, let's catch up. This afternoon would work – around 1:30 pm Eastern time? I'll ring you.

Best,
Veronica

From: Sutter, John <John.Sutter@fticonsulting.com>
Sent: Monday, March 1, 2021 9:48 AM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Cc: Windle, Travis <Travis.Windle@fticonsulting.com>
Subject: **[**EXTERNAL**]** RE: [EXTERNAL] update on EHN "study"

Hi, Veronica –

You may have seen this already, but just wanted to share that this EHN series finally hit this morning, with the Latkanich's the subject of part 2. It's a lengthy series with lots to unpack, but haven't seen much traction on it beyond the activist groups who are funded by the same foundation (Heinz Endowments).

Let's catch up over the phone if you have a minute early this week. Pretty flexible this afternoon and tomorrow if there's a window that looks good for you.

Looking forward to it.
John

Overview: <https://www.ehn.org/fractured-series-on-fracking-pollution-2650624600/fractured-fracking>
Part 1: <https://www.ehn.org/fractured-harmful-chemicals-fracking-2650428324/family-video>
Part 2: <https://www.ehn.org/fractured-fracking-mental-health-toll-2650516366/particle-27>
Part 3: <https://www.ehn.org/fractured-fracking-regulation-neglect-2650594611/particle-1>
Part 4: <https://www.ehn.org/fractured-oil-and-gas-pollution-2650623184/particle-26>

From: Sutter, John
Sent: Wednesday, November 4, 2020 8:21 AM

To: Flores-Paniagua, Veronica <vflorespaniagua@chevron.com>

Subject: RE: [EXTERNAL] update on EHN "study"

Looking forward to chatting in a bit. Here's the approach we're weighing for the MSC. We got her to admit this in writing, which will be helpful in post-story fact-checks / beating back any copycats: *"This data has not yet been peer reviewed or published. These are preliminary findings and analysis and review are still underway."*

"For the tens of thousands of Pennsylvanians who work hard each day producing natural gas in the communities where they live and raise their families, there's no greater priority than safety. We're proud to responsibly produce clean, affordable natural gas, which creates local community, public health, economic and environmental benefits – benefits that have been widely documented by any number of independent agencies and research bodies over the years.

"As an industry of engineers, we take science seriously. We also understand that certain organizations utilize aligned entities -- which they financially support -- to spread fear and misinformation. We can accept that reality, but we do not accept their so-called 'research,' which fails to meet the most basic thresholds to be considered remotely credible. It's convenient for the Environmental Health News and its anti-natural gas financiers at the Heinz Endowments to gloss over the fact that this 'study' hasn't been independently peer reviewed or analyzed for objective controls and variables, or even validated by someone who's not a blogger.

"Protecting and enhancing public health is our top priority and we'll continue to seek out and look to legitimate, independent scientific analysis. As part of this commitment to actual science, we'll also ensure the public has important facts and understand the motivations of certain organizations that peddle misinformation and fear aimed at driving clicks." Marcellus Shale Coalition president David Spigelmyer

From: Sutter, John

Sent: Tuesday, November 3, 2020 7:53 PM

To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>

Cc: Windle, Travis <Travis.Windle@fticonsulting.com>

Subject: Re: [EXTERNAL] update on EHN "study"

Hi, Veronica - It's a big night! Always takes me back to my campaign days, although I'm grateful to wake up tomorrow still employed! Let's definitely connect in the morning to swap notes. Pretty flexible tomorrow - would 10am EST work for you?

On Nov 3, 2020, at 5:16 PM, Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com> wrote:

Hi, y'all. As someone who has been in a newsroom for a good number of presidential elections, I'm having a hard time concentrating today. I should have written this simple note to you hours ago, but I have been getting lost in my Twitter feed. LOL.

Along with one of AMBU's former lawyers who's still providing counsel on the Latkanich issue, I met today with the Chevron toxicologist who reviewed the EHN report. In summary, she said that the study design was not appropriate. She also said that there's no evidence that people who collected the samples were qualified to do so. (Didn't the reporter say *she* collected the samples?) Thus, the health comparison values mean nothing (because the data would be considered invalid by basic scientific standards.)

I wondered if you've been able to get the study reviewed independently. If it's possible to grab about 15 minutes of your time tomorrow, can we chat about next steps?

Best,
Veronica

Veronica Flores-Paniagua
External Affairs Advisor - Americas
Chevron Corporation
Corporate Affairs

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From: Oliver, Trip[o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=19e305c669b74d65a21ecfdd3dd6a9c1-KDRD]
Sent: Wed 10/9/2019 1:27:44 PM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Subject: FW: research

Veronica,

In your timeline you were looking for a source for the quote from the toxicologist. The quote was from a presentation he did in 2013. The link below summarizes the event. The highlighted link in the email at the bottom contains the audio. The quote is near the end of the audio at 1:02:40.

From: Sutter, John <John.Sutter@fticonsulting.com>

Sent: Friday, September 6, 2019 10:06 AM

To: Oliver, Trip <TripOliver@chevron.com>; Calvert, Nathan <ncalvert@chevron.com>

Cc: Windle, Travis <Travis.Windle@fticonsulting.com>

Subject: **[**EXTERNAL**]** RE: research

The presentation was posted online 2016, but created in 2013:

https://www.pehsu.net/cgi/page.cgi/zine.html/Oil_Exploration/Toxicology_of_Hydraulic_Fracturing

From: Oliver, Trip <TripOliver@chevron.com>

Sent: Friday, September 06, 2019 9:58 AM

To: Sutter, John <John.Sutter@fticonsulting.com>; Calvert, Nathan <ncalvert@chevron.com>

Cc: Windle, Travis <Travis.Windle@fticonsulting.com>

Subject: [EXTERNAL] RE: research

John,

When did he make the presentation where is makes that comment?

From: Sutter, John <John.Sutter@fticonsulting.com>

Sent: Thursday, September 5, 2019 11:11 AM

To: Oliver, Trip <TripOliver@chevron.com>; Calvert, Nathan <ncalvert@chevron.com>

Cc: Windle, Travis <Travis.Windle@fticonsulting.com>

Subject: **[**EXTERNAL**]** research

Trip, Nate –

We did some initial digging into Michael Abesamis, looking for evidence of activism, overt bias, etc. Unfortunately, there's not much there beyond what we've already discovered. He's presented a handful of times before activist groups, but he hasn't and his department hasn't received Heinz (or other similar groups – Park, Rockefeller, Colcom) funding. He's pretty quiet on social media, too, and his medical licenses in West Virginia and Pa. don't show any disciplinary actions.

We watched the presentation he's given around toxicology & hydraulic fracturing – recording linked below. What's interesting here are his quotes at the end: *"I have a hard time getting causality in a lot of these cases. I do get a lot of associations, but I haven't been able to find a hard case, in the evaluations I've seen in these hydraulic fracturing cases, that really have a causality at this point."*

If he has struggled to confirm causation with other cases, then it seems strange that he would so concretely make that affirmation in this case. I'd be interested to see what that report actually says and it wouldn't surprise me if Latkanich (and Hopey & Templeton) is jumping to causation when the report says much less. If there's additional media inquiries on his claims, might be worth asking the reporter to share the toxicology report.

One other noteworthy item – Latkanich uses coal/wood to heat his house. Can't imagine that's great for indoor air quality.

Abesamis information:

- **Online presentation (attached):** <https://icollaborative.aamc.org/resource/4290/>
 - **Presentation Recording with Audio:** <https://spaces.hightail.com/receive/wl0wwwQnJ2t>
- **May 2019 Southwest Pa. Environmental Health Project Flier:**
<https://cdn2.hubspot.net/hubfs/4678477/2019%20Bulletin/19apr.pdf>
- **FAQs on Hydraulic Fracturing & Toxicology:**
https://www.acmt.net/cgi/page.cgi/zine.html/Ask_A_Toxicologist/I_live_in_an_area_where_hydraulic_fracturing_or_fracking_natural_gas_drilling_occurs.Can_you_tell_me_what_laboratory_tests_my_doctor_can_perform_to_determine_if_I_have_been_exposed_to_toxic_substances_as_a_result_of_this_drilling

John Sutter

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From: balambie@chevron.com
Sent: Thur 3/12/2020 8:57:43 PM (UTC)
To: ryork@chevron.com; balambie@chevron.com
Subject: Conversation between balambie@chevron.com and ryork@chevron.com

balambie@chevron.com [10:36 AM]:

Morning Randy

ryork@chevron.com [10:36 AM]:

hey

balambie@chevron.com [10:37 AM]:

How do we think tings will play out with the ESCGP at Latkanich?

ryork@chevron.com [10:38 AM]:

jerk answer first.... "Tings will play out irey, mon!"

balambie@chevron.com [10:39 AM]:

haha

balambie@chevron.com [10:39 AM]:

that is a true statement

ryork@chevron.com [10:40 AM]:

all we can do is work to answer his questions, and get Scott Perry to pressure quick turnaround

balambie@chevron.com [10:40 AM]:

was Mohamed the reviewer?

ryork@chevron.com [10:42 AM]:

worst case scenario. Manny.

ryork@chevron.com [10:42 AM]:

your typo set the tone for the day now!

ryork@chevron.com [10:43 AM]:

"Don't worry! Every little tings gonna be alright."

balambie@chevron.com [10:44 AM]:

hahaha

balambie@chevron.com [10:44 AM]:

my fingers get ahead of my internal spell check.....and now ive done it

balambie@chevron.com [10:44 AM]:

lo

balambie@chevron.com [10:44 AM]:

lol

From: Jacobson, Lindsey (NBCUniversal)[Lindsey.Jacobson@nbcuni.com]
Sent: Thur 12/12/2019 9:59:32 PM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Cc: Crinklaw, Morgan J[Morgan.Crinklaw@chevron.com]; Hadavi, Tala (NBCUniversal)[Tala.Hadavi@nbcuni.com]
Subject: **[**EXTERNAL**]** Re: [EXTERNAL] Seeking a Conversation

Hi Veronica,

We did check with Bryan and he did not grant us permission to share the report with you. It includes personal medical data so we are not at liberty to share the report without Bryan's consent.

We reference general points made in the report in our piece so you'll be able to see those when the video is published.

Thank you,

Lindsey

Lindsey Jacobson

Senior Producer, Markets & Politics

CNBC | (C) [551-266-1892](tel:551-266-1892) | (O) [201-735-4904](tel:201-735-4904)

On Dec 12, 2019, at 4:53 PM, Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com> wrote:

Thank you, Lindsey. As we conveyed back in September, we've not seen the report. Will you be making it available for our review?

Thanks,
Veronica

From: Jacobson, Lindsey (NBCUniversal) <Lindsey.Jacobson@nbcuni.com>
Sent: Thursday, December 12, 2019 3:27 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>; Crinklaw, Morgan J <Morgan.Crinklaw@chevron.com>
Cc: Hadavi, Tala (NBCUniversal) <Tala.Hadavi@nbcuni.com>
Subject: **[**EXTERNAL**]** Re: [EXTERNAL] Seeking a Conversation

Hi Veronica,

Yes, we do refer to the toxicology report.

Thank you,

Lindsey

From: "Flores-Paniagua, Veronica" <VFloresPaniagua@chevron.com>
Date: Thursday, December 12, 2019 at 3:49 PM
To: "Jacobson, Lindsey (NBCUniversal)" <Lindsey.Jacobson@nbcuni.com>, "Crinklaw, Morgan J" <Morgan.Crinklaw@chevron.com>
Cc: "Hadavi, Tala (NBCUniversal)" <Tala.Hadavi@nbcuni.com>

Subject: RE: [EXTERNAL] Seeking a Conversation

Hi, Lindsey. Thank you for your email and the heads up. Before we respond, please advise if you are planning to refer to the toxicology report.

Best,
Veronica

From: Jacobson, Lindsey (NBCUniversal) <Lindsey.Jacobson@nbcuni.com>
Sent: Thursday, December 12, 2019 9:44 AM
To: Crinklaw, Morgan J <Morgan.Crinklaw@chevron.com>; Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Cc: Hadavi, Tala (NBCUniversal) <Tala.Hadavi@nbcuni.com>
Subject: [**EXTERNAL**] Re: [EXTERNAL] Seeking a Conversation

Hi Morgan and Veronica,

I hope this note finds you well. We're moving forward with our piece about energy independence. As you know, we spoke with one of your leaseholders, Bryan Latkanich. The only time we mention Chevron is in the context of his case. I'm reaching out for final comment from Chevron in time for our deadline of 12/18. We will consider Morgan's note below as the answer to the majority of our questions. However, we have one remaining question about the offer Chevron made to Mr. Latkanich:

Bryan told CNBC that Chevron offered him \$520,000 to compensate him for the damages to his property (without an admission of wrongdoing), as partly reported by the Pittsburgh Gazette. He says he has asked for \$670,000. Is this accurate? And if so, where are you in those negotiations?

As I mentioned before, we have removed any footage or any part of the interview we shot with you in PA. Please feel free to reach out with any questions. Again, the deadline to submit this project is 12/18. I hope to hear from you soon.

Sincerely,

Lindsey

From: "Angelova, Kamelia (NBCUniversal)" <Kamelia.Angelova@nbcuni.com>
Date: Thursday, September 19, 2019 at 11:54 AM
To: "Crinklaw, Morgan J" <Morgan.Crinklaw@chevron.com>, "Flores-Paniagua, Veronica" <VFloresPaniagua@chevron.com>
Cc: "Hadavi, Tala (NBCUniversal)" <Tala.Hadavi@nbcuni.com>, "Jacobson, Lindsey (NBCUniversal)" <Lindsey.Jacobson@nbcuni.com>
Subject: Re: [EXTERNAL] Seeking a Conversation

Hi Morgan,

Thank you for reaching out. I am adding your colleague, Veronica Flores-Paniagua, who has been

aware of this story for months. Tala has been in constant contact with her.

I also personally reached out to Veronica in good faith on August 21 to assure her that we want to work with Chevron. While we disagreed with Chevron's statements that we came to your facilities to shoot for a completely different story, we decided not to use any sound or footage from that visit in this because we want to be good partners. We asked to talk to someone from company on issues we were reporting on but we didn't hear back.

In the meantime, Veronica gave a comment to The Pittsburgh Gazette on a story about Bryan: <https://newsinteractive.post-gazette.com/fracking-and-health-2/>
Our questions for Chevron are not any different than the Gazette's. We were baffled that Chevron chose to comment to the Gazette on the same issues we were seeking comments on at the same time, and while we were being cooperative and good partners.

We are checking, if we have permission to share the toxicology report with you as it is a confidential medical record.

My producers have done diligent reporting, the piece has gone through multiple layers of review, and we are confident in the story we are telling. We are explaining the various sides of the story and we would love to be able to tell your Chevron's side as well.

I am happy to jump on a call with you. I will follow up with some options for Friday or Monday morning.

Many thanks.

-Kamelia

From: "Crinklaw, Morgan J" <Morgan.Crinklaw@chevron.com>
Date: Wednesday, September 18, 2019 at 10:09 PM
To: "Angelova, Kamelia (NBCUniversal)" <Kamelia.Angelova@nbcuni.com>
Cc: "Hadavi, Tala (NBCUniversal)" <Tala.Hadavi@nbcuni.com>, "Jacobson, Lindsey (NBCUniversal)" <Lindsey.Jacobson@nbcuni.com>
Subject: [EXTERNAL] Seeking a Conversation

Hi Kamelia –

It has come to my attention that CNBC is knowingly producing a story that advances claims against Chevron that are not substantiated. Given Chevron's long-standing relationship with CNBC, we find this troubling and would appreciate the opportunity to discuss the issue with you by phone or in person at your convenience.

In short, CNBC producers Tala Hadavi and Lindsey Jacobson (copied here) have informed us that they are advancing the second part of a series related to shale in the United States. As part of that second installment, they plan to include unsubstantiated claims by a landowner that Chevron's operations have polluted his drinking water, causing adverse health effects for his family.

We take issues relating to our operations and the communities where we operate seriously. That's why both Chevron Appalachia and the Pennsylvania Department of Environmental Protection (DEP) have thoroughly investigated this landowner's claims. The Pennsylvania DEP analyzed the landowner's water seven times between April 2013 and March 2019 and determined that the landowner's water supply was "not adversely affected by oil and gas activities, including but not limited to drilling,

alteration, or operation of an oil or gas well.”

Given the fact there is no evidence to support these serious claims and that DEP has affirmatively determined otherwise, the landowner’s claims of contamination and health effects should not be included in the series.

It is troubling that despite knowing this information, CNBC’s producers not only continue to include it in their story, but press Chevron to disprove the allegations. The producers have also asked us to comment on a toxicology report, which Chevron has not seen. According to media reports, the toxicology report does not conclude that Chevron’s operations have impacted the landowner’s drinking water or health. In fact, CNBC’s producers stated that they have not spoken to the author of the report, yet are seeking a comment from Chevron on its findings.

Again, given Chevron’s long-standing relationship with CNBC, we would appreciate the opportunity to discuss these and other concerns with you by phone or in person at your convenience.

Thank you in advance for your attention to this matter. I look forward to hearing from you.

Best,

Morgan

Morgan Crinklaw

Manager, Upstream External Affairs

Corporate Affairs

Chevron Corporation

6001 Bollinger Canyon Rd., G2180

San Ramon, CA 94583

Office: 925-842-4204

Cell: 925-336-6415

Follow me: @mjcrinklaw

From: Robertson, Kent S [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=580473328dbf495d9b6000d5b26d4468-krdq]
Sent: Thur 8/15/2019 6:07:54 PM (UTC)
To: Flores-Paniagua, Veronica [VFloresPaniagua@chevron.com]
Subject: RE: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Thanks

Kent Robertson
Manager, Global External Affairs
Policy, Government and Public Affairs
Chevron Corporation
6001 Bollinger Canyon Road
San Ramon, CA 94583-2324
ph: 925-842-1456
mobile: 925-858-4289
krdq@chevron.com

From: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Sent: Thursday, August 15, 2019 8:55 AM
To: Crinklaw, Morgan J <Morgan.Crinklaw@chevron.com>; Robertson, Kent S <KRDQ@chevron.com>
Subject: FW: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Her response.

From: Hadavi, Tala (NBCUniversal) <Tala.Hadavi@nbcuni.com>
Sent: Thursday, August 15, 2019 10:43 AM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Cc: Angelova, Kamelia (NBCUniversal) <Kamelia.Angelova@nbcuni.com>
Subject: [**EXTERNAL**] Re: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Hi Veronica,

Thank you for your message. The documentary we have produced is a balanced deep-dive into the shale revolution as a whole and its impact on the U.S. economy and the local communities it has affected. We are looking at all aspects of the energy shift the U.S. has experienced in the past decade or so. Since we have profiled one of your leaseholders, we wanted to provide you the opportunity to comment. Please let me know if this is of interest. I look forward to hearing from you.

Best,

Tala

Tala Hadavi
Producer | Markets & Politics
900 Sylvan Ave.
Englewood Cliffs, NJ 07632
(o) 201-735-4818
(c) 201-220-3043

From: "Flores-Paniagua, Veronica" <VFloresPaniagua@chevron.com>
Date: Thursday, August 15, 2019 at 11:21 AM
To: "Hadavi, Tala (NBCUniversal)" <Tala.Hadavi@nbcuni.com>
Cc: "Angelova, Kamelia (NBCUniversal)" <Kamelia.Angelova@nbcuni.com>
Subject: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Hi, Tala.

Thank you for your email, Tala. Are you still planning to develop the story your team pitched to visit our facilities in Washington County? This angle doesn't sound like the story scope that was described to us at the outset of that engagement. I'm glad to discuss if you'd like to call me. I'm in meetings from through 11 a.m. Central time, but can talk later.

Best,

Veronica

Veronica Flores-Paniagua

External Affairs Advisor

Corporate Affairs

Chevron North America E&P

1400 Smith Street, Office 49098

Houston, TX 77002

P: 713-372-0063

C: 713-213-3082

VFloresPaniagua@chevron.com

@vxflores

From: Hadavi, Tala (NBCUniversal) <Tala.Hadavi@nbcuni.com>

Sent: Wednesday, August 14, 2019 4:07 PM

To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>

Cc: Angelova, Kamelia (NBCUniversal) <Kamelia.Angelova@nbcuni.com>

Subject: **[**EXTERNAL**]** CNBC documentary about Shale Revolution

Hi Veronica,

I hope this note finds you well. As you know, I have been working on a series about U.S. Energy. The second piece, about the shale revolution, will be published next week. It profiles farmers and lease holders in Pennsylvania, one of whom is one of your leaseholders, Bryan Latkanich. I am reaching out because we'd love to interview someone from Chevron about your business relationship with Bryan.

We are hoping to have a response from you within the next 24hrs. I look forward to hearing from you.

Best,

Tala

Tala Hadavi

Producer | Markets & Politics

900 Sylvan Ave.

Englewood Cliffs, NJ 07632

(o) 201-735-4818

(c) 201-220-3043

From: Robertson, Kent S[o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=580473328dbf495d9b6000d5b26d4468-krdq]
Sent: Thur 8/15/2019 8:14:56 PM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Subject: Re: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Thanks. Talking to them in 30 minutes. Do you have their original pitch?

Kent Robertson
Manager, Global External Affairs
Policy, Government and Public Affairs
Chevron Corporation
6001 Bollinger Canyon Road
San Ramon, CA 94583-2324
ph: 925-842-1456
mobile: 925-858-4289
krdq@chevron.com

On Aug 15, 2019, at 1:07 PM, Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com> wrote:

New info ...FTI/Marcellus Shale Coalition has learned that Tala apparently spoke to 40 landowners. In her earlier email, you'll notice she specifically says that Latkanich is being profiled in the piece.

From: Robertson, Kent S <KRDQ@chevron.com>
Sent: Thursday, August 15, 2019 1:08 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Subject: RE: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Thanks

Kent Robertson
Manager, Global External Affairs
Policy, Government and Public Affairs
Chevron Corporation
6001 Bollinger Canyon Road
San Ramon, CA 94583-2324
ph: 925-842-1456
mobile: 925-858-4289
krdq@chevron.com

From: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Sent: Thursday, August 15, 2019 8:55 AM
To: Crinklaw, Morgan J <Morgan.Crinklaw@chevron.com>; Robertson, Kent S <KRDQ@chevron.com>
Subject: FW: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Her response.

From: Hadavi, Tala (NBCUniversal) <Tala.Hadavi@nbcuni.com>
Sent: Thursday, August 15, 2019 10:43 AM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Cc: Angelova, Kamelia (NBCUniversal) <Kamelia.Angelova@nbcuni.com>
Subject: [**EXTERNAL**] Re: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Hi Veronica,

Thank you for your message. The documentary we have produced is a balanced deep-dive into the shale revolution as a whole and its impact on the U.S. economy and the local communities it has affected. We are looking at all aspects of the energy shift the U.S. has experienced in the past decade or so. Since we have profiled one of your leaseholders, we wanted to provide you the opportunity to

comment. Please let me know if this is of interest. I look forward to hearing from you.

Best,

Tala

Tala Hadavi

Producer | Markets & Politics

900 Sylvan Ave.

Englewood Cliffs, NJ 07632

(o) 201-735-4818

(c) 201-220-3043

From: "Flores-Paniagua, Veronica" <VFloresPaniagua@chevron.com>

Date: Thursday, August 15, 2019 at 11:21 AM

To: "Hadavi, Tala (NBCUniversal)" <Tala.Hadavi@nbcuni.com>

Cc: "Angelova, Kamelia (NBCUniversal)" <Kamelia.Angelova@nbcuni.com>

Subject: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Hi, Tala.

Thank you for your email, Tala. Are you still planning to develop the story your team pitched to visit our facilities in Washington County? This angle doesn't sound like the story scope that was described to us at the outset of that engagement. I'm glad to discuss if you'd like to call me. I'm in meetings from through 11 a.m. Central time, but can talk later.

Best,

Veronica

Veronica Flores-Paniagua

External Affairs Advisor

Corporate Affairs

Chevron North America E&P

1400 Smith Street, Office 49098

Houston, TX 77002

P: 713-372-0063

C: 713-213-3082

VFloresPaniagua@chevron.com

[@vxflores](https://twitter.com/vxflores)

From: Hadavi, Tala (NBCUniversal) <Tala.Hadavi@nbcuni.com>

Sent: Wednesday, August 14, 2019 4:07 PM

To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>

Cc: Angelova, Kamelia (NBCUniversal) <Kamelia.Angelova@nbcuni.com>

Subject: [**EXTERNAL**] CNBC documentary about Shale Revolution

Hi Veronica,

I hope this note finds you well. As you know, I have been working on a series about U.S. Energy. The second piece, about the shale revolution, will be published next week. It profiles farmers and lease holders in Pennsylvania, one of whom is one of your leaseholders, Bryan Latkanich. I am reaching out because we'd love to interview someone from Chevron about your business relationship with Bryan. We are hoping to have a response from you within the next 24hrs. I look forward to hearing from you.

Best,

Tala

Tala Hadavi

Producer | Markets & Politics

900 Sylvan Ave.

Englewood Cliffs, NJ 07632

(o) 201-735-4818

(c) 201-220-3043

From: Robertson, Kent S[o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=580473328dbf495d9b6000d5b26d4468-krdq]
Sent: Wed 8/21/2019 3:31:05 PM (UTC)
To: Flores-Paniagua, Veronica[VFloresPaniagua@chevron.com]
Cc: Crinklaw, Morgan J[Morgan.Crinklaw@chevron.com]
Subject: RE: [EXTERNAL] RE: CNBC documentary about Shale Revolution

I'm stuck on calls for at least another 45 minutes. Can follow-up afterwards but have another call at noon your time. Please don't reply until the three of us have spoken.

Kent Robertson
Manager, Global External Affairs
Policy, Government and Public Affairs
Chevron Corporation
6001 Bollinger Canyon Road
San Ramon, CA 94583-2324
ph: 925-842-1456
mobile: 925-858-4289
krdq@chevron.com

From: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Sent: Wednesday, August 21, 2019 8:27 AM
To: Robertson, Kent S <KRDQ@chevron.com>
Cc: Crinklaw, Morgan J <Morgan.Crinklaw@chevron.com>
Subject: FW: [EXTERNAL] RE: CNBC documentary about Shale Revolution
FYI....Tala just sent this. My comments follow the questions.

From: Hadavi, Tala (NBCUniversal) <Tala.Hadavi@nbcuni.com>
Sent: Wednesday, August 21, 2019 10:18 AM
To: Angelova, Kamelia (NBCUniversal) <Kamelia.Angelova@nbcuni.com>; Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Subject: **[**EXTERNAL**]** Re: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Hi Veronica,

As Kamelia mentioned, we are not including any of the footage we shot or the interview we conducted with Stacy Olsen in the piece. But would love some comments to the following:

1. I interviewed Washington Commissioner Diana Vaughan for the piece and she spoke about jobs and funds invested in the area in general. I would love some numbers on total jobs created and economic growth that Chevron has contributed to in the region? This is an industry question that should be directed to Marcellus Shale Coalition.
2. What are some community initiatives you're currently doing in the area? Stacey addressed in May.
3. How are you addressing or viewing the health concerns of the communities in PA (such as water and land contamination) as a company? Stacey addressed in May.
4. Brian Latkanich, one of your leaseholders in Washington County, has concerns about water contamination to his property. Could you please comment on that? CNBC should talk to the state DEP about its findings.
5. Allegedly, some of the oversight with casing led to flooding and damaging of his property. Do you have a comment on that? This question makes absolutely no sense.
6. His water tests show that the levels of Bromide, sodium, chloride, turbidity and TDS increased (or were present) from the time of the pre-drill. What are your thoughts about that? CNBC should talk to the state about its findings.
7. Also, his son's toxicology report show a link between his health concerns and the gas drilling. Could you comment please. Refer again back to the state.

As Kamelia mentioned, the piece is publishing on Friday. We kindly ask that we have the responses by tomorrow early afternoon latest so that I can include in the piece.

Again, I look forward to hearing from you and please don't hesitate to call me if you have any questions.

Best,

Tala

Tala Hadavi

Producer | Markets & Politics

900 Sylvan Ave.

Englewood Cliffs, NJ 07632

(o) 201-735-4818

(c) 201-220-3043

From: "Angelova, Kamelia (NBCUniversal)" <Kamelia.Angelova@nbcuni.com>

Date: Wednesday, August 21, 2019 at 9:00 AM

To: "Hadavi, Tala (NBCUniversal)" <Tala.Hadavi@nbcuni.com>, "Flores-Paniagua, Veronica" <VFloresPaniagua@chevron.com>

Subject: Re: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Hi Veronica,

I am the executive producer of CNBC Digital. I know you had concerns about using the footage Tala captured during her tag-along with Tom DiChristopher a few months back.

The story of the Shale Revolution and the road to U.S. energy independence includes many voices and sides, and Chevron is, of course, a part of that. The story, as other story often would, evolved through all the reporting and interviews we've done. While we disagree that we mislead you in any way, we want to be good partners and we are not going to use any of the footage and sound Tala filmed on her visit.

We hope that you give us the opportunity to comment on our questions for this piece, tells us about all the jobs and positive initiatives Chevron has created, and address the concerns of the community as well.

Tala will follow up with questions. The piece is going to be published on Friday.

Many thanks for your help and consideration.

Best,

Kamelia

From: "Hadavi, Tala (NBCUniversal)" <Tala.Hadavi@nbcuni.com>

Date: Friday, August 16, 2019 at 7:09 PM

To: "Flores-Paniagua, Veronica" <VFloresPaniagua@chevron.com>

Cc: "Angelova, Kamelia (NBCUniversal)" <Kamelia.Angelova@nbcuni.com>

Subject: Re: [EXTERNAL] RE: CNBC documentary about Shale Revolution

Hi Veronica, following up on our correspondence. We think it would be important to include the perspective of Chevron in our piece and therefore would love to interview someone in regards to this. Please let me know when you get a chance.

Thank you in advance.

Best,

Tala

On Aug 15, 2019, at 11:21 AM, Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com> wrote:

Hi, Tala.

Thank you for your email, Tala. Are you still planning to develop the story your team pitched to visit our facilities in Washington County? This angle doesn't sound like the story scope that was described to us at the outset of that engagement. I'm glad to discuss if you'd like to call me. I'm in meetings from through 11 a.m. Central time, but can talk later.

Best,

Veronica

Veronica Flores-Paniagua

External Affairs Advisor

Corporate Affairs

Chevron North America E&P

1400 Smith Street, Office 49098
Houston, TX 77002
P: 713-372-0063
C: 713-213-3082
VFloresPaniagua@chevron.com
[@vxflores](https://www.linkedin.com/in/vxflores)

From: Hadavi, Tala (NBCUniversal) <Tala.Hadavi@nbcuni.com>

Sent: Wednesday, August 14, 2019 4:07 PM

To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>

Cc: Angelova, Kamelia (NBCUniversal) <Kamelia.Angelova@nbcuni.com>

Subject: **[**EXTERNAL**]** CNBC documentary about Shale Revolution

Hi Veronica,

I hope this note finds you well. As you know, I have been working on a series about U.S. Energy. The second piece, about the shale revolution, will be published next week. It profiles farmers and lease holders in Pennsylvania, one of whom is one of your leaseholders, Bryan Latkanich. I am reaching out because we'd love to interview someone from Chevron about your business relationship with Bryan. We are hoping to have a response from you within the next 24hrs. I look forward to hearing from you.

Best,

Tala

Tala Hadavi

Producer | Markets & Politics

900 Sylvan Ave.

Englewood Cliffs, NJ 07632

(o) 201-735-4818

(c) 201-220-3043

From: Flores-Paniagua, Veronica [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A4A7E70378344A39B44240AA5E53F78A-VEFB]
Sent: Thur 10/29/2020 6:03:06 PM (UTC)
To: Kristina Marusic [kmarusic@ehsciences.org]
Subject: RE: [**EXTERNAL**] Re: Chevron inquiry

Thanks for sharing this report, and we understand its confidential nature. I'll be in touch soon.

Best,
Veronica

From: Kristina Marusic <kmarusic@ehsciences.org>
Sent: Thursday, October 29, 2020 12:53 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Subject: [**EXTERNAL**] Re: Chevron inquiry

Hi Veronica,

Thanks again for your patience on this. I have attached a report with additional details about our design, methodology, data and findings.

Please note that this document is confidential. This document is intended only for internal review by Chevron, as these results have not been published.

We can extend the deadline for a response to next Friday (Nov. 6th). An on the record phone or Zoom is preferable to an emailed response—please let me know if I can get one on the calendar.

Thank you again,
Kristina

On Tue, Oct 27, 2020 at 4:15 PM Kristina Marusic <kmarusic@ehsciences.org> wrote:
Hi Veronica,

Apologies for the delay getting back to you. I have to get permission from Mr. Latkanich before sharing more of his specific results, and am conferring with my editors and a legal consultant about what else I'm able to disclose at this point. We can extend the deadline for your response. I'll send more information as soon as I'm able.

Thank you for your patience.
Sincerely,

Kristina

On Mon, Oct 26, 2020 at 10:44 AM Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com> wrote:
Good morning, Kristina.

While it would be a challenge for us to turn around an assessment in time for your deadline, we would appreciate a copy of your team's study, including, design, methodology, data and findings. Could you please send that to me as soon as possible today to give us time for a meaningful review?

In addition, we want to be sure you have the correct information about the DEP's findings.

Your email to us last week mischaracterized and inaccurately paraphrased the DEP's determination letters. If you have seen the letters, you're aware that a 2013 letter states: "... there were no significant changes in your [Mr. Latkanich's] water supply that could be attributed to oil and gas activities." In addition, DEP's 2019 determination letter states: "The Department has determined that the Water Supply was not adversely affected by oil and gas activities including but not limited to the drilling, alteration, or operation of an oil or gas well." If you do not have copies of the letters, we can make them available to you.

Thank you for your attention.

Best,
Veronica

From: Kristina Marusic <kmarusic@ehsciences.org>
Sent: Thursday, October 22, 2020 11:02 AM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Subject: [****EXTERNAL****] Re: Chevron inquiry

Hi Veronica,

Thank you for following up. Some background information and my questions are below.
Background:

Mr. Latkanich alleges that Chevron's drilling of the wells on his property resulted in damage to his home's foundation. He also alleges that the wells have negatively impacted his health and the health of his son, and that he now fears his soil is too contaminated to safely grow food or raise livestock on.

I am aware that Chevron has maintained that their wells did not cause any of these issues. I am also aware that DEP's water investigations have concluded that Chevron could not be held liable for the issues with Mr. Latkanich's water, and that Chevron plugged the wells on Mr. Latkanich's property this spring. Mr. Latkanich stated that a Chevron employee told him the wells were being plugged because his ongoing complaints about them rendered the wells "too hairy" to include in Chevron's sale of its Appalachian assets. Mr. Latkanich has also stated that the sound and lights from the Chevron-owned compressor station near his home keeps him awake at night, and that he worries about emissions from that facility impacting his and his child's health.

In the summer of 2019 (prior to the closure of the wells) I collected air, water, and urine samples from several households in southwestern Pennsylvania, including the Latkanich household. These samples were analyzed for the presence of 39 chemicals commonly emitted from unconventional oil and gas wells and compressor stations in a university laboratory using the best available instrumentation and methodologies.

Urine samples collected from Bryan and Ryan Latkanich exceeded the U.S. 95th percentile (using CDC's NHANES data for comparison) for a number of compounds, including mandelic acid, a metabolite for ethylbenzene and styrene; phenylglyoxylic acid, a metabolite of ethylbenzene and styrene; and trans, trans-muconic acid, a metabolite for benzene.

On July 24, 2019 Ryan Latkanich had a level of hippuric acid in his urine more than 91 times as high as the U.S. median and nearly five times as high as the U.S. 95th percentile. Hippuric acid is a metabolite for Toluene. This was the highest level of hippuric acid detected in anyone in our study. The same urine sample also showed a level

of mandelic acid nearly 42 times as high as the U.S. median and nearly 13 times as high as the U.S. 95th percentile; this also was the highest level of mandelic acid detected in anyone in our study.

We are aware that there are other potential sources of exposure to these compounds. We kept extensive records of what the Latkaniches did on the days leading up to our sample collection, and none of their dietary choices, activities, or exposure to household chemicals account for these exposures being so much higher than national averages.

The air monitors worn by Bryan and Ryan when they were both at home or in their yard all day showed detectable levels of 39 compounds on one or more monitoring days. For several compounds, including benzaldehyde, m/p-ethyltoluene, 1-dodecanol, and 4-heptanone, the Latkanich air monitors recorded the highest levels seen in our study.

The levels of benzene, ethylbenzene, and naphthalene detected on one or more sampling days exceeded the Inhalation Unit Risk limit set by the California Office of Environmental Health Hazard Assessment. This limit reflects the level of inhalation exposure that's likely to increase cancer risk by more than 1 in a million in an entire population if everyone is consistently exposed to this level of a chemical over the course of their lifetimes.

Our water testing found detectable levels of numerous compounds for which no legal thresholds exist, including butyl cyclohexane, n-dodecane, naphthalene, tridecane, 2-methylnaphthalene, 1-methylnaphthalene, tetradecane, and pentadecane.

Exposure to these compounds is linked to a wide range of negative health impacts, including eye, ear, and skin irritation; respiratory problems; gastrointestinal problems; reproductive harm and infertility; and increased cancer risk.

Despite the closure of the wells on his property, Mr. Latkanich has expressed that he remains concerned about emissions from Chevron's nearby compressor station (as well as well pads and other infrastructure owned by other operators).

My questions:

1. Why did Chevron opt to plug the wells on Mr. Latkanich's property this spring?
2. Would Chevron like to comment on the findings of our study?
3. Any other comments on Mr. Latkanich's statements?

Thank you in advance,

Kristina Marusic

Reporter at Environmental Health News
(c) 412-519-4618

On Thu, Oct 22, 2020 at 11:48 AM Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com> wrote:
Hi, Kristina.

We've received your inquiry and welcome the exchange. You mentioned you have some background information and questions. Please send those my way.

Best,
Veronica

Veronica Flores-Paniagua
External Affairs Advisor - Americas
Chevron Corporation

Corporate Affairs

1400 Smith Street, Office 49098
Houston, TX 77002
P: 713-372-0063
C: 713-213-3082
VFloresPaniagua@chevron.com
[@vxflores](https://www.linkedin.com/company/vxflores)

From: Flores-Paniagua, Veronica[/O=CHEVRON/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=VEFBA30]
Sent: Fri 10/13/2017 2:51:12 PM (UTC)
To: Oliver, Trip[TripOliver@chevron.com]
Cc: Calvert, Nathan[ncalvert@chevron.com]
Subject: RE: Chevron media inquiry

Thanks for the update.

Best
Veronica

From: Oliver, Trip
Sent: Friday, October 13, 2017 9:50 AM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Cc: Calvert, Nathan <ncalvert@chevron.com>
Subject: RE: Chevron media inquiry

Veronica,

Thanks for the information. We should have a response for you to provide by Tuesday. Thanks.

Trip

From: Flores-Paniagua, Veronica
Sent: Thursday, October 12, 2017 6:00 PM
To: Oliver, Trip <TripOliver@chevron.com>
Cc: Calvert, Nathan <ncalvert@chevron.com>
Subject: RE: Chevron media inquiry

The wells are private, and I landed with the homeowner's name: Brian Latkanich (Thus, the well names of Latkanich 1 and 2).

From: Oliver, Trip
Sent: Thursday, October 12, 2017 4:44 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Cc: Calvert, Nathan <ncalvert@chevron.com>
Subject: RE: Chevron media inquiry

Is this private well water or public water?

From: Flores-Paniagua, Veronica
Sent: Thursday, October 12, 2017 5:29 PM
To: Oliver, Trip <TripOliver@chevron.com>
Cc: Calvert, Nathan <ncalvert@chevron.com>
Subject: RE: Chevron media inquiry

Hi, Trip.

The reporter responded, but without a homeowner name. She did, however, identify the wells where the sampling was done. Here's her response, followed by some additional thoughts from me.

The wells are Latkanich 1 and 2 in Deemston, PA. The homeowner's child recently had some G-I problems and as a result, he had his water tested by DEP in February and the Center for Environmental Research and Education at Duquesne University in July. The DEP tests showed high turbidity and the presence of coliform bacteria. The coliform was absent in 2011, when the baseline test was done.

The DU test showed sodium at 510.38 mg/l compared to 238.38 mg/l in 2011.

Calcium is 93.43 mg/l compared to 1.9 in 2011

Iron is .125 mg/l versus .027 mg/l in 2011.

Strontium is 3.01 versus 0.184 in 2011.

The sodium is much higher than the 30-60mg/l in the EPA drinking water guidelines, 20mg/l per day if you're on a sodium restricted diet as the homeowner is.

My questions are:

1. Should the homeowner be concerned about these numbers?
2. Could they be related to natural gas development?
3. Did Chevron do its own baseline? And if, so what do they say?
4. What is the next step here for Chevron Appalachia?

For the purposes of this inquiry, I recommend keeping the wells as our focus, rather than the individual homeowner. There are too many factors regarding the individual homeowner and his child's health that are beyond our control. The overarching question is about the impact of Chevron Appalachia's operations on the community/environment, and specifically impact on the water table.

I'm glad to chat on the phone if you want to discuss.

Best,
Veronica

From: Oliver, Trip
Sent: Thursday, October 12, 2017 3:46 PM
To: Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Cc: Calvert, Nathan <ncalvert@chevron.com>
Subject: RE: Chevron media inquiry

Veronica,

Please let me know as soon as you have more information, especially a name of the landowner. Thanks.

From: Flores-Paniagua, Veronica
Sent: Thursday, October 12, 2017 3:37 PM
To: Oliver, Trip <TripOliver@chevron.com>
Cc: Calvert, Nathan <ncalvert@chevron.com>
Subject: Chevron media inquiry

Hi, Trip.

I wanted to give you a heads up that we've received the inquiry below. The inquiry is cryptic, so I will be asking the reporter for additional details – primarily, I want to know the basis for the claim that the property and water well in question are part of Chevron Appalachia's operations. But I thought you should be in the loop as I begin the exchange with the reporter. I'll keep you posted on any developments.

Best,
Veronica

From: Media Team
Sent: Thursday, October 12, 2017 1:49 PM
To: Ordonez, Isabel I <isabel.ordonez@chevron.com>; Flores-Paniagua, Veronica <VFloresPaniagua@chevron.com>
Cc: Crinklaw, Morgan J <Morgan.Crinklaw@chevron.com>
Subject: FW: **[**EXTERNAL**]** Contact Chevron - Media Relations

Veronica, Isabel – For your attention...

From: neela.banerjee@insideclimatenews.org [<mailto:noreply@qemailserver.com>]
Sent: Thursday, October 12, 2017 11:48 AM
To: Media Team <media@chevron.com>
Subject: **[**EXTERNAL**]** Contact Chevron - Media Relations

From: Neela Banerjee neela.banerjee@insideclimatenews.org

Hello, I'm working on a story re hydraulic fracturing and as part of reporting, I visited a Chevron Appalachia leaseholder in PA. He got a baseline test done for his well water in 2011, before drilling began. Water tests from July 2017 show increases in concentrations of sodium, iron, calcium and strontium in his water. Sodium in particular doubled over this six-year period and exceeds EPA guidelines for sodium levels in drinking water. Could I speak to someone at Chevron Appalachia about these results? My deadline is midday Thursday 10/19. Thank you.
Neela Banerjee

From: Flores-Paniagua, Veronica[/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A4A7E70378344A39B44240AA5E53F78A-VEFB]
Sent: Wed 12/18/2019 8:38:36 PM (UTC)
To: Jacobson, Lindsey (NBCUniversal)[Lindsey.Jacobson@nbcuni.com]
Cc: Hadavi, Tala (NBCUniversal)[Tala.Hadavi@nbcuni.com]
Subject: Chevron inquiry

Lindsey,

We again strongly advise that CNBC.com reconsider publishing this story. The angle as you have presented to Chevron is based on false, misleading and discredited claims. Most troubling of all is your decision to refer to the toxicology report, which Mr. Latkanich has only made available to news outlets but which we have not been allowed to see. If you aren't able to provide us a copy, you should not use it as a source.

Please see our responses below:

- **Bryan Latkanich alleges that the gas drilling on his property adversely affected his water source. His water tests show that the levels of Bromide, sodium, chloride, turbidity and TDS increased (or were present) from the time of the pre-drill. What are your thoughts about that?**

- Results of extensive water tests by the Pennsylvania Department of Environmental Protection *clearly and repeatedly* demonstrate that Mr. Latkanich's water quality is about the same now as before the wells were drilled and the chemical composition of his water is distinctly different than the water from our operations.

- **He also believes that the water runoff from improper casing (in addition to precipitation) caused damage to his property. Could you please comment on that?**

- Regarding the assertion about "improper casing," this is a completely false and baseless claim. We encourage you to substantiate this claim.

- An independent inspection of the wall showed the damage began before 2013 and resulted from inadequate buttressing of the long cinder block wall during construction of this house *before* Chevron initiated activities on his property.

- **You received two citations by the Pennsylvania Department of Environmental Protection in relation to the incident from 2012. Could you please comment?**

- As CNBC.com can easily verify with the DEP, the state's January 8, 2013 notice of violation (NOV) is related to the company's work to remove accumulated rainwater from the drilling site during the reclaiming process. The company was restoring the site after active operations had been completed on the well pad located on Mr. Latkanich's property. Immediately upon learning of the DEP's concerns, Chevron stopped pumping the rainwater, and the remaining rainwater was hauled out by truck. Chevron's testing of the rainwater, as reported to the state and, again, which CNBC.com can easily verify with the DEP, found it to be within state standards for discharge requirements under Chapter 78.60.

- **Bryan's son Ryan's toxicology report indicates that his health problems are a result of gas drilling, could you please comment?**

- We strenuously object to your use of Dr. Abesamis' report in your story. The toxicology report does not and cannot prove exposure or causation of health issues. In paraphrasing the toxicology report, a recent news article inaccurately concluded that "hydraulic fracturing exposure" was the

cause of Ryan Latkanich's health problems. Although we have not been allowed to view the report that Mr. Latkanich has made available only to the media, the direct quotes from Dr. Abesamis' report in that article do not support that conclusion.

• **Lastly, Bryan has said that you offered him \$520,000 to compensate him for the damages to his property (without admitting to wrongdoing), as partly reported by the Pittsburgh Gazette. He says he has asked for \$670,000. Is this accurate? And if so, where are you in those negotiations?**

- We have worked with Mr. Latkanich in good faith for six years to finish grading the land on the well site as required by our permit. Mr. Latkanich has refused access to his property for this work even though it is allowed by the terms of his lease. Nevertheless, Mr. Latkanich has accepted and cashed monthly royalty payments from Chevron.
- Over the past six years, Mr. Latkanich has made outrageous demands for payment from Chevron for property claims, but not once has he asked us for compensation for any alleged health claims. Nor has he ever pursued any legal action against Chevron.
- While we are not responsible for Mr. Latkanich's water nor his house foundation issues, we have sought to reach an amicable resolution with him to achieve compliance with our permits.
 - We offered to pay a professional mediator of his choice to help us reach a mutually agreeable resolution. He declined.
 - We offered to buy his property outright for above fair market value (\$520,000). He declined and asked for \$2.5 million.
 - We offered a goodwill payment (\$170,000) to access the property to conduct the restoration work. He declined and demanded \$670,000.
 - We then offered to buy his property for \$670,000, which he declined.

You also should know that, having exhausted all reasonable options to resolve this issue and achieve regulatory compliance, we have made the business decision to permanently seal the two Latkanich wells, remove our equipment from his property and restore the site to its approximate original contours. (This process is known in the industry as "plugging and abandoning" the wells.) Mr. Latkanich has indicated his support, but is still demanding payment.

Chevron takes public health very seriously, and one of our top priorities is to protect the environment and the community. While we respect Mr. Latkanich's right to air his concerns, we also believe it is important and incumbent upon CNBC's journalistic integrity to ensure that your story accurately portrays the facts.

Thank you for your attention.

Veronica Flores-Paniagua
External Affairs Advisor
Corporate Affairs
Chevron North America E&P

1400 Smith Street, Office 49098
Houston, TX 77002
P: 713-372-0063
C: 713-213-3082
VFloresPaniagua@chevron.com

@vxflores

EXHIBIT B1

September 1, 2020

Dear Bryan,

Thank you for participating in the pilot study, “Human exposure to chemicals associated with unconventional oil and gas operations in Pennsylvania.”

Last summer I collected air, water, and urine samples from five Southwestern Pennsylvania households, including yours. Three households were within two miles of fracking wells, and two were at least five miles away from the nearest fracking well.

This report will inform you of the laboratory results for the urine, water, and air samples I collected for your family. These samples were analyzed at the University of Missouri for chemicals commonly emitted from fracking sites and their breakdown products.

Please keep these results confidential.

You may share this information with a physician or counselor, but please don't share it beyond your immediate family or discuss it online or on social media until after we have published our findings in *Environmental Health News*.

Think of this report as a starting point in our exploration of these lab results. I wanted to get you the information I have now as quickly as possible, but I'm still in the process of working with statisticians and epidemiologists to further analyze these results. I will provide you with more information and insights about our findings as I have them moving forward.

In the meantime, if you have questions or would like clarification about anything contained in this report, please don't hesitate to email, call, or text me.

Important notes about these results:

- These test results list health effects that have been linked to exposure to these chemicals in animal studies, human studies, or both.
- **Having these chemicals in your body or environment does not necessarily mean you will experience these health effects.**
- Because so many factors contribute to overall health—including genetics and many different types of environmental exposures—our findings in this study will not enable us to directly relate the levels of chemicals in your body or environment to any individual health conditions.

Important notes about the urine results:

- There are two separate sets of urine sample results for each family member: One that looks at metabolites, or breakdown products of chemicals your body has processed and excreted, and one that looks at parent compounds themselves.
- **The metabolite results provide us with the most insight about what chemicals you've been exposed to.**
- Your metabolite results were compared to the median and the 95th percentile measured in the general U.S. population obtained from the National Health and Nutrition Examination Survey (NHANES) conducted by the U.S. Centers for Disease Control and Prevention. The median is the middle number in a data set; the 95th percentile is the level that 95% of numbers in a data set fall below.
- These tests reflect the exposure to chemicals you had over the previous few days. If your test results are higher than the median or 95th percentile seen in the U.S. population, it means that you had higher than average exposure to these chemicals.
- There are several possible reasons for higher-than-average results, including activities that aren't related to exposures from

gas wells. For example, it's not uncommon to see slight elevations of these chemicals in urine samples in people that have recently been in contact with gasoline, paint, varnish, shellac, rust preventives, pesticides, or cigarette smoke.

- Since NHANES data isn't available for 4 of the 11 metabolites we tested for, your results have also been compared against the median level seen among all participants in our study for reference.
- The levels of parent compounds are included here too, but it's difficult to find data to compare them against—most scientific studies focus on metabolites since they offer a more accurate indication of exposure. Your levels of the parent compounds are also compared to the median level seen in our study for reference.
- **While an elevated level of a parent compound *does* indicate a high level of recent exposure, a low level in a parent compound *does not necessarily* indicate a lower level of exposure.** This is because the parent compound wouldn't show up if it's already been broken down by the body.

Important notes about the air and water results:

- The results of the wearable air monitor samples we collected were compared to recommendations for the maximum amount of chemicals that should be in the air to avoid health impacts where they exist.
- **Most of these standards were developed for short-term workplace exposures that occur in workers who handle these chemicals, so they may not accurately reflect the risk associated with ongoing, low-dose exposure.**
- The results of the water samples I took from your home were compared to state and federal regulations for safety where they exist. They were also compared to the median level seen in our study for reference.

- Unfortunately, for many of the chemicals we tested for, safety standards don't yet exist for how much exposure through air or water is safe. More research—like this study—is needed to determine whether exposure to these chemicals is widespread enough to warrant new safety standards.

Moving forward:

Physicians and nurses at the Environmental Health Project of Southwestern Pennsylvania are available to consult with you about these test results. Here is their contact information:

Dr. Ned Ketyer
eketyer@environmentalhealthproject.org
724-255-7440

Sarah Rankin
srankin@environmentalhealthproject.org
724-260-5504

If you would like to speak with a qualified counselor who can help you process your response to these findings, please let me know—I will be happy to help connect you with one.

Thank you again for your participation in the study.

Sincerely,



Kristina Marusic
Reporter for Environmental Health News
kmarusic@ehn.org
(c) 412-519-4618

Urine Testing Results - Metabolites: Bryan Latkanich

All measurements are creatinine-adjusted parts per million (ppm)

Metabolite	Parent Chemical (s)	Potential Health Effects*	Metabolite levels in your urine			Median for U.S. Population	95th percentile for U.S. Population	Median for Our Study
			7/24/19	8/5/19	8/19/19			
Hippuric acid	Toluene, Cinnamaldehyde	Nervous system, kidney, or liver problems; skin irritation; increased cancer risk	304,048	104,885	226,938	18,000	360,000	170,783
2-hydroxy-N-methylsuccinimide	N-Methyl-2-pyrrolidone (NMP)	Skin, eye, and respiratory irritation; kidney, liver, and nervous system problems; reproductive harm in pregnant individuals	410,674	381,153	322,324	N/A	N/A	250,594
Mandelic acid	Ethylbenzene, Styrene	Liver, kidney, or circulatory system problems; increased cancer risk	1,492	3,096	1,229	124	408	2,315
4-Methylhippuric acid	Xylene	Headache, dizziness, drowsiness, nausea, tiredness, nervous system damage; eye, skin, and lung irritation; increased cancer risk	442	167	317	210	1500	230
2-Methylhippuric acid	Xylene	Headache, dizziness, drowsiness, nausea, tiredness, nervous system damage; eye, skin, and lung irritation; increased cancer risk	165	194	224	40	276	106
3-Methylhippuric Acid	Xylene	Headache, dizziness, drowsiness, nausea, tiredness, nervous system damage; eye, skin, and lung irritation; increased cancer risk	85	193	135	210	1500	96
Alpha-Naphthyl Glucuronide	Naphthalene	Skin and eye irritation; nausea, vomiting, abdominal cramps, diarrhea; nervous system problems, kidney problems, jaundice, anemia	191	297	362	N/A	N/A	264
Beta-Naphthyl Sulphate	Naphthalene	Skin and eye irritation; nausea, vomiting, abdominal cramps, diarrhea; nervous system problems, kidney problems, jaundice, anemia	46	43	71	N/A	N/A	61
Phenylglyoxylic Acid	Ethylbenzene, Styrene	Liver, kidney, or circulatory system problems; increased cancer risk	940	1,971	1,488	210	520	741
Trans, Trans-Muconic Acid	Benzene	Anemia; decrease in blood platelets; increased risk of cancer	354	1,052	797	77	470	436
2-Pyrrolidone	N-Methyl-2-pyrrolidone (NMP)	Skin, eye, and respiratory irritation; kidney, liver, and nervous system problems; birth defects in pregnant individuals	5,040	6,884	6,941	N/A	N/A	4,239

Median = The middle number in the data set
95th percentile = 95% of levels fall below this number

How to Read Your Results	
	Exceeds 95th percentile for the general U.S. population
	Exceeds median for the general U.S. population
	No U.S. population data available
	Below median and 95th percentile for the general U.S. population

* This list includes findings from both human and animal studies. Having this chemical in your air, water, or body does not necessarily mean that you will experience these health effects.

Sources: Agency for Toxic Substances and Disease Registry (ATSDR): <https://www.atsdr.cdc.gov/>
New Jersey Department of Health Hazardous Substances Fact Sheets: <https://www.nj.gov/health/workplacehealthandsafety/right-to-know/hazardous-substances/toxicology-data-network/>
Toxicology Data Network: <https://toxnet.nlm.nih.gov/index.html>

U.S. Centers for Disease Control and Prevention, National Institutes of Health, World Health Organization, Agency for Toxic Substances and Disease Registry, European Chemicals Agency
New Jersey Department of Health, Chemwatch, Sigma-Aldrich, the Human Metabolome Database, Thermo Fisher Scientific

Urine Testing Results - Parent Compounds: Bryan Latkanich

All measurements are creatinine-adjusted parts per million (ppm)

Compound	Potential Health Effects*	Levels in your urine			Median for Our study
		7/23/19	8/6/19	8/19/19	
1,2,3-Trimethylbenzene	Skin and eye irritation, liver and respiratory damage, anemia, increased cancer risk	—	—	—	0.32
1,2,4,5-Tetramethylbenzene	Nervous system problems; respiratory irritation	—	—	—	—
1,2,4-Trimethylbenzene	Skin and eye irritation, liver and respiratory damage, anemia, increased cancer risk	—	—	—	1.07
1,3,5-Trimethylbenzene	Skin and eye irritation, liver and respiratory damage, anemia, increased cancer risk	—	—	—	—
1-Methylnaphthalene	Skin irritation	—	—	—	—
2-Ethylhexanol-1	Irritation of nose, throat, and lungs; dizziness, nausea, headache, nervous system problems	—	—	47.36	14.83
2-Heptanone	Irritation to the skin, eyes, and, respiratory system; headaches, vomiting, and nausea.	—	—	—	14.25
2-Methylnaphthalene	Skin irritation	—	—	—	1.92
2-Pentanone	Digestive tract irritation	62.75	218.52	11.00	182.26
4-Heptanone	Irritation of eyes and skin, central nervous system depression, dizziness, drowsiness, decreased breath, liver damage	10.11	—	—	42.53
4-isothiocyanato-1-butene	Skin, eye, and respiratory irritation or damage; difficulty breathing, kidney, urinary tract, and bladder problems, reproductive harm in pregnant individuals	—	—	—	—
Allyl isothiocyanate	Skin, eye, and respiratory irritation; difficulty breathing	—	—	—	51.13
Alpha-Pinene	Headache; nausea; vomiting; central nervous system issues; skin, eye, and respiratory irritation; kidney damage	—	—	—	—
Benzene	Anemia; decrease in blood platelets; increased cancer risk	1.36	2.41	1.83	0.72
Butylcyclohexane	Respiratory irritation; central nervous system problems; drowsiness and dizziness; lung damage	—	—	—	—
Carvone	Skin irritation	—	—	—	80.26
Cumene	Eye, skin, gastrointestinal and respiratory irritation; tiredness, irritability; kidney, urinary tract, and bladder problems; reproductive harm in pregnant individuals; increased cancer risk	—	—	—	—
Decane	Irritation of nose, throat, and lungs; dizziness	6.22	—	12.67	4.54
D-Limonene	Eye, skin, and gastrointestinal irritation	—	—	—	1.13
Dodecane	Skin and respiratory irritation	—	—	—	2.73
Ethylbenzene	Eye and skin irritation; liver or kidney problems; reproductive harm in pregnant individuals; increased cancer risk	—	—	—	0.49
Ethylcyclohexane	Skin, eye, and respiratory irritation; dizziness and drowsiness; central nervous system problems	—	—	—	2.86
Heptane	Nervous system problems	3.83	9.77	24.30	3.86
M/P-Diethylbenzene	Irritation of skin, nose, and throat; headache, nausea, vomiting, dizziness; liver and kidney damage	—	—	—	—
M/P-Ethyltoluene	Eye, skin, and respiratory irritation	—	—	—	—
M/P-Xylene	Nervous system damage; increased cancer risk	—	—	—	0.33
Methyl Salicylate	Eye, skin, and respiratory irritation; central nervous system and gastrointestinal problems; liver and kidney damage	—	—	—	3.71
Methylcyclohexane	Skin and eye irritation; dizziness or drowsiness	—	—	—	0.73
Naphthalene	Damage to blood cells, increased cancer risk	—	2.84	—	1.77
Nonane	Skin irritation, dizziness, liver damage	—	—	—	0.66
N-Propylbenzene	Skin and eye irritation, headache, nausea, vomiting	—	—	—	—
Octane	Irritation of nose, throat, and lungs; headache, dizziness	2.18	—	6.30	2.35
O-Diethylbenzene	Respiratory, skin, and eye irritation	—	—	—	—
O-Xylene	Nervous system damage; increased cancer risk	—	—	—	1.19
Pentadecane	Skin and eye irritation	—	—	—	10.04
Styrene	Liver, kidney, or circulatory system problems; increased cancer risk	—	—	—	—
Tetradecane	Nausea, vomiting and diarrhea; central nervous system problems	—	—	—	1.47
Toluene	Nervous system, kidney, or liver problems; increased cancer risk	2.38	5.41	4.72	1.65
Tridecane	Skin irritation, headache	—	—	—	—
Undecane	Skin and eye irritation	14.68	46.90	57.60	19.42

How to Read Your Results	
—	Exceeds Median for Our Study
—	Chemical not detected

* This list includes findings from both human and animal studies. Having this chemical in your air, water, or body does not necessarily mean that you will experience these health effects.

Sources: Agency for Toxic Substances and Disease Registry (ATSDR): <https://www.atsdr.cdc.gov/> New Jersey Department of Health Hazardous Substances Fact Sheets: [https://www.nj.gov/health/workplacehealthandsafety/right-to-know/hazardous-substances/ Toxicology Data Network: https://toxnet.nlm.nih.gov/index.html](https://www.nj.gov/health/workplacehealthandsafety/right-to-know/hazardous-substances/Toxicology_Data_Network_https://toxnet.nlm.nih.gov/index.html)



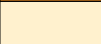

U.S. Centers for Disease Control and Prevention, National Institutes of Health, World Health Organization, Agency for Toxic Substances and Disease Registry, European Chemicals Agency New Jersey Department of Health, Chemwatch, Sigma-Aldrich, the Human Metabolome Database, Thermo Fisher Scientific

Urine Testing Results - Metabolites: Ryan Latkanich

All measurements are creatinine-adjusted parts per million (ppm)

Metabolite	Parent Chemical (s)	Potential Health Effects*	Metabolite levels in your urine			Median for U.S. Population	95th percentile for U.S. Population	Median for Our Study
			7/24/19	8/5/19	8/19/19			
Hippuric acid	Toluene, Cinnamaldehyde	Nervous system, kidney, or liver problems; skin irritation; increased cancer risk	1,646,215	85,062	327,594	18,000	360,000	170,783
2-hydroxy-N-methylsuccinimide	N-Methyl-2-pyrrolidone (NMP)	Skin, eye, and respiratory irritation; kidney, liver, and nervous system problems; reproductive harm in pregnant individuals	526,248	453,510	257,164	N/A	N/A	250,594
Mandelic acid	Ethylbenzene, Styrene	Liver, kidney, or circulatory system problems; increased cancer risk	5,193	2,272	3,891	124	408	2,315
4-Methylhippuric acid	Xylene	Headache, dizziness, drowsiness, nausea, tiredness, nervous system damage; eye, skin, and lung irritation; increased cancer risk	2,723	148	727	210	1500	230
2-Methylhippuric acid	Xylene	Headache, dizziness, drowsiness, nausea, tiredness, nervous system damage; eye, skin, and lung irritation; increased cancer risk	178	81	544	40	276	106
3-Methylhippuric Acid	Xylene	Headache, dizziness, drowsiness, nausea, tiredness, nervous system damage; eye, skin, and lung irritation; increased cancer risk	304	78	272	210	1500	96
Alpha-Naphthyl Glucuronide	Naphthalene	Skin and eye irritation; nausea, vomiting, abdominal cramps, diarrhea; nervous system problems, kidney problems, jaundice, anemia	1,928	249	266	N/A	N/A	264
Beta-Naphthyl Sulphate	Naphthalene	Skin and eye irritation; nausea, vomiting, abdominal cramps, diarrhea; nervous system problems, kidney problems, jaundice, anemia	58	21	45	N/A	N/A	61
Phenylglyoxylic Acid	Ethylbenzene, Styrene	Liver, kidney, or circulatory system problems; increased cancer risk	1,826	956	3,266	210	520	741
Trans, Trans-Muconic Acid	Benzene	Anemia; decrease in blood platelets; increased risk of cancer	1,129	264	2,112	77	470	436
2-Pyrrolidone	N-Methyl-2-pyrrolidone (NMP)	Skin, eye, and respiratory irritation; kidney, liver, and nervous system problems; birth defects in pregnant individuals	9,633	5,009	6,736	N/A	N/A	4,239

Median = The middle number in the data set
95th percentile = 95% of levels fall below this number

How to Read Your Results	
	Exceeds 95th percentile for the general U.S. population
	Exceeds median for the general U.S. population
	No U.S. population data available
	Below median and 95th percentile for the general U.S. population

* This list includes findings from both human and animal studies. Having this chemical in your air, water, or body does not necessarily mean that you will experience these health effects.

Sources: Agency for Toxic Substances and Disease Registry (ATSDR): <https://www.atsdr.cdc.gov/>
New Jersey Department of Health Hazardous Substances Fact Sheets: <https://www.nj.gov/health/workplacehealthandsafety/right-to-know/hazardous-substances/toxicology-data-network/>
Toxicology Data Network: <https://toxnet.nlm.nih.gov/index.html>

U.S. Centers for Disease Control and Prevention, National Institutes of Health, World Health Organization, Agency for Toxic Substances and Disease Registry, European Chemicals Agency
New Jersey Department of Health, Chemwatch, Sigma-Aldrich, the Human Metabolome Database, Thermo Fisher Scientific

Urine Testing Results - Parent Compounds: Ryan Latkanich

All measurements are creatinine-adjusted parts per million (ppm)

Compound	Potential Health Effects*	Levels in your urine			Median for Our study
		7/23/19	8/6/19	8/19/19	
1,2,3-Trimethylbenzene	Skin and eye irritation, liver and respiratory damage, anemia, increased cancer risk	—	—	—	0.32
1,2,4,5-Tetramethylbenzene	Nervous system problems; respiratory irritation	—	—	—	—
1,2,4-Trimethylbenzene	Skin and eye irritation, liver and respiratory damage, anemia, increased cancer risk	—	—	—	1.07
1,3,5-Trimethylbenzene	Skin and eye irritation, liver and respiratory damage, anemia, increased cancer risk	—	—	—	—
1-Methylnaphthalene	Skin irritation	—	—	—	—
2-Ethylhexanol-1	Irritation of nose, throat, and lungs; dizziness, nausea, headache, nervous system problems	—	10.24	—	14.83
2-Heptanone	Irritation to the skin, eyes, and, respiratory system; headaches, vomiting, and nausea.	—	—	—	14.25
2-Methylnaphthalene	Skin irritation	—	—	—	1.92
2-Pentanone	Digestive tract irritation	109.53	74.56	—	182.26
4-Heptanone	Irritation of eyes and skin, central nervous system depression, dizziness, drowsiness, decreased breath, liver damage	65.50	—	20.62	42.53
4-isothiocyanato-1-butene	Skin, eye, and respiratory irritation or damage; difficulty breathing, kidney, urinary tract, and bladder problems, reproductive harm in pregnant individuals	—	—	—	—
Allyl isothiocyanate	Skin, eye, and respiratory irritation; difficulty breathing	53.14	—	—	51.13
Alpha-Pinene	Headache; nausea; vomiting; central nervous system issues; skin, eye, and respiratory irritation; kidney damage	—	—	—	—
Benzene	Anemia; decrease in blood platelets; increased cancer risk	—	0.93	1.84	0.72
Butylcyclohexane	Respiratory irritation; central nervous system problems; drowsiness and dizziness; lung damage	—	—	—	—
Carvone	Skin irritation	—	—	—	80.26
Cumene	Eye, skin, gastrointestinal and respiratory irritation; tiredness, irritability; kidney, urinary tract, and bladder problems; reproductive harm in pregnant individuals; increased cancer risk	—	—	—	—
Decane	Irritation of nose, throat, and lungs; dizziness	29.90	—	6.31	4.54
D-Limonene	Eye, skin, and gastrointestinal irritation	—	—	—	1.13
Dodecane	Skin and respiratory irritation	—	—	—	2.73
Ethylbenzene	Eye and skin irritation; liver or kidney problems; reproductive harm in pregnant individuals; increased cancer risk	—	—	—	0.49
Ethylcyclohexane	Skin, eye, and respiratory irritation; dizziness and drowsiness; central nervous system problems	—	—	11.22	2.86
Heptane	Nervous system problems	7.65	3.23	24.00	3.86
M/P-Diethylbenzene	Irritation of skin, nose, and throat; headache, nausea, vomiting, dizziness; liver and kidney damage	—	—	—	—
M/P-Ethyltoluene	Eye, skin, and respiratory irritation	—	—	—	—
M/P-Xylene	Nervous system damage; increased cancer risk	—	—	—	0.33
Methyl Salicylate	Eye, skin, and respiratory irritation; central nervous system and gastrointestinal problems; liver and kidney damage	—	—	—	3.71
Methylcyclohexane	Skin and eye irritation; dizziness or drowsiness	—	—	—	0.73
Naphthalene	Damage to blood cells, increased cancer risk	2.03	1.12	—	1.77
Nonane	Skin irritation, dizziness, liver damage	—	—	—	0.66
N-Propylbenzene	Skin and eye irritation, headache, nausea, vomiting	—	—	—	—
Octane	Irritation of nose, throat, and lungs; headache, dizziness	2.82	—	—	2.35
O-Diethylbenzene	Respiratory, skin, and eye irritation	—	—	—	—
O-Xylene	Nervous system damage; increased cancer risk	—	—	—	1.19
Pentadecane	Skin and eye irritation	—	—	—	10.04
Styrene	Liver, kidney, or circulatory system problems; increased cancer risk	—	—	—	—
Tetradecane	Nausea, vomiting and diarrhea; central nervous system problems	—	—	—	1.47
Toluene	Nervous system, kidney, or liver problems; increased cancer risk	3.54	1.48	8.50	1.65
Tridecane	Skin irritation, headache	—	—	—	—
Undecane	Skin and eye irritation	69.15	12.33	58.72	19.42

How to Read Your Results	
—	Exceeds Median for Our Study
—	Chemical not detected

* This list includes findings from both human and animal studies. Having this chemical in your air, water, or body does not necessarily mean that you will experience these health effects.

Sources: Agency for Toxic Substances and Disease Registry (ATSDR): https://www.atsdr.cdc.gov/New_Jersey_Department_of_Health_Hazardous_Substances_Fact_Sheets:

https://www.nj.gov/health/workplacehealthandsafety/right-to-know/hazardous-substances/Toxicology_Data_Network_https://toxnet.nlm.nih.gov/index.html

U.S. Centers for Disease Control and Prevention, National Institutes of Health, World Health Organization, Agency for Toxic Substances and Disease Registry, European Chemicals Agency

New Jersey Department of Health, Chemwatch, Sigma-Aldrich, the Human Metabolome Database, Thermo Fisher Scientific

Air Testing Results: Bryan Latkanich

Measurements are in micrograms per cubic meter (µg/m³)

Chemical	Potential Health Effects*	Level in your air		Median for Our Study
		July 23, 2019	August 5, 2019	
1,2,3-Trimethylbenzene	Dizziness; headaches; tiredness; blood clotting issues; lung irritation; eye and skin irritation; increased cancer risk	0.071	0.236	0.79
1,2,4,5-Tetramethylbenzene	Nervous system problems; respiratory irritation	0.022	0.136	0.26
1,2,4-Trimethylbenzene	Respiratory, nervous, and blood system problems; increased cancer risk	0.234	0.661	1.98
1,3,5-Trimethylbenzene	Nervous system damage; increased cancer risk	0.062	0.139	0.51
1-Dodecanol	Skin, eye, and respiratory irritation	0.186	0.175	1.22
1-Methylnaphthalene	Skin irritation	0.016	0.022	0.13
2 Ethyl 1 Hexanol	Respiratory irritation; nervous system damage; liver and kidney problems	0.504	0.607	3.81
2-Heptanone	Skin and eye irritation; respiratory and nervous system problems	0.026	0.039	0.3
2-Methylnaphthalene	Skin irritation	0.029	0.045	0.27
4-Heptanone	Eye and skin irritation; central nervous system damage; liver problems	0.012	—	0.11
Alpha-Pinene	Headache; nausea; vomiting; central nervous system issues; skin, eye, and respiratory irritation; kidney damage	0.026	0.031	0.74
Benzaldehyde	Eye, skin, and respiratory irritation; dizziness	0.768	1.192	3.4
Benzene	Anemia; decrease in blood platelets; increased cancer risk	0.635	0.698	1.01
Butylcyclohexane	Respiratory irritation; central nervous system problems; drowsiness and dizziness; lung damage	0.043	0.031	0.18
Cumene	Headache; dizziness and drowsiness; central nervous system problems; eye and skin irritation; kidney and liver damage; increased cancer risk	0.026	0.041	0.14
Decanal	Eye and skin irritation; respiratory problems; gastrointestinal problems	8.744	6.555	3.74
Decane	Irritation of nose, throat, and lungs; dizziness	0.099	0.194	1.95
D-Limonene	Skin irritation	0.136	0.098	5.51
Dodecane	Skin and respiratory irritation	0.112	0.335	1.24
Ethylbenzene	Liver or kidneys problems; increased cancer risk	0.283	0.403	1.11
Ethylcyclohexane	Skin, eye, and respiratory irritation; dizziness and drowsiness; central nervous system problems	0.088	0.069	0.25
Heptanal	Skin, eye, and respiratory irritation	0.652	0.841	1.55
Hexanal	Headache; respiratory, eye, and skin irritation	0.899	0.828	2.01
M/P-Diethylbenzene	Irritation of skin, nose, and throat; headache, nausea, vomiting, dizziness; liver and kidney damage	0.041	0.127	0.42
M/P-Ethyltoluene	Eye, skin, and respiratory irritation	0.435	0.779	2.26
m/p-Xylene	Nervous system damage; increased cancer risk	0.45	0.946	1.88
Methyl salicylate	Eye, skin, and respiratory irritation; central nervous system and gastrointestinal problems; liver and kidney damage	0.162	0.204	0.4
Naphthalene	Neurological damage, liver damage, eye damage; increased cancer risk	0.2	0.11	0.53
N-Nonane	Skin irritation, dizziness, liver damage	0.389	0.422	1.3
N-Octanal	Headache, nausea, dizziness, eye and skin irritation, pulmonary tract irritation, central nervous system problems	1.438	1.834	2.81
N-Propylbenzene	Skin and eye irritation, headache, nausea, vomiting	0.056	0.128	0.36
Octane	Respiratory, skin, and eye irritation; dizziness and headache	1.355	—	2.54
O-Diethylbenzene	Respiratory, skin, and eye irritation	0.123	0.59	1.22
O-Xylene	Nervous system damage; increased cancer risk	0.331	0.589	1.43
Pentadecane	Skin and eye irritation	0.179	0.166	0.94
Styrene	Liver, kidney, or circulatory system problems; increased cancer risk	0.029	0.021	0.58
Tetradecane	Nausea, vomiting and diarrhea; central nervous system problems	0.15	0.269	1.54
Toluene	Nervous system, kidney, or liver problems; increased cancer risk	1.856	4.539	16.21
Tridecane	Skin irritation, headache	0.139	0.321	0.6
Undecane	Skin and eye irritation	0.21	0.28	1.3

How to Read Your Results

	Exceeds a level estimated to cause non-cancer health effects over a lifetime
	Exceeds a level of exposure estimated to increase cancer risk by more than 1 in a million
	No state or federal exposure limits available
	Below available exposure limits
	Chemical not found in your air sample

Recommended Exposure Limits

Compounds	RIC, µg/m ³	IUR ×10 ⁻⁶ (µg/m ³)-1	References
1,2,3-Trimethylbenzene	60		EPA
1,2,4-Trimethylbenzene	60		EPA
1,3,5-Trimethylbenzene	60		EPA
Benzene	30	29	EPA, OEHHA
Cumene	400		EPA
Ethylbenzene	1,000	2.5	EPA, OEHHA
Xylenes	10		EPA
Naphthalene	3	34	EPA, OEHHA
Styrene	1,000		EPA
Toluene	5,000		EPA

RIC = Reference Concentration; an estimate of a level of continuous inhalation exposure likely to be without an appreciable risk of harmful non-cancer effects over a lifetime

IUR = Inhalation Unit Risk; an estimate of the level of inhalation exposure that's likely to increase lifetime cancer risk by more than 1 in a million

EPA = U.S. Environmental Protection Agency

OEHHA = California Office of Environmental Health Hazard Assessment

* This list includes findings from both human and animal studies. Having this chemical in your air, water, or body does not necessarily mean that you will experience these health effects.

Sources: EPA, 2009. Risk Assessment Guidance for Superfund (RAGS); Part F, 2009.

https://www.epa.gov/sites/production/files/2015-09/documents/partf_200901_final.pdf Integrated Risk Information System (IRIS) Assessments

<https://cfpub.epa.gov/ncea/iris/search/index.cfm>. Assessed July 4th 2018 The Office of Environmental Health Hazard Assessment (OEHA), Toxicity criteria on chemicals evaluation

U.S. Centers for Disease Control and Prevention, National Institutes of Health, World Health Organization, Agency for Toxic Substances and Disease Registry, European Chemicals Agency New Jersey Department of Health, Chemwatch, Sigma-Aldrich, the Human Metabolome Database, Thermo Fisher Scientific

Air Testing Results: Ryan Latkanich

Measurements are in micrograms per cubic meter (µg/m³)

Chemical	Potential Health Effects*	Level in your air		Median for Our Study
		July 23, 2019	August 5, 2019	
1,2,3-Trimethylbenzene	Dizziness; headaches; tiredness; blood clotting issues; lung irritation; eye and skin irritation; increased cancer risk	0.313	0.216	0.79
1,2,4,5-Tetramethylbenzene	Nervous system problems; respiratory irritation	0.096	0.262	0.26
1,2,4-Trimethylbenzene	Respiratory, nervous, and blood system problems; increased cancer risk	1.011	0.488	1.98
1,3,5-Trimethylbenzene	Nervous system damage; increased cancer risk	0.306	—	0.51
1-Dodecanol	Skin, eye, and respiratory irritation	2.864	17.632	1.22
1-Methylnaphthalene	Skin irritation	0.066	0.059	0.13
2 Ethyl 1 Hexanol	Respiratory irritation; nervous system damage; liver and kidney problems	4.499	10.095	3.81
2-Heptanone	Skin and eye irritation; respiratory and nervous system problems	0.183	—	0.3
2-Methylnaphthalene	Skin irritation	0.141	0.062	0.27
4-Heptanone	Eye and skin irritation; central nervous system damage; liver problems	0.118	—	0.11
Alpha-Pinene	Headache; nausea; vomiting; central nervous system issues; skin, eye, and respiratory irritation; kidney damage	0.148	—	0.74
Benzaldehyde	Eye, skin, and respiratory irritation; dizziness	6.064	31.89	3.4
Benzene	Anemia; decrease in blood platelets; increased cancer risk	0.748	4.079	1.01
Butylcyclohexane	Respiratory irritation; central nervous system problems; drowsiness and dizziness; lung damage	—	—	0.18
Cumene	Headache; dizziness and drowsiness; central nervous system problems; eye and skin irritation; kidney and liver damage; increased cancer risk	0.078	—	0.14
Decanal	Eye and skin irritation; respiratory problems; gastrointestinal problems	20.046	24.697	3.74
Decane	Irritation of nose, throat, and lungs; dizziness	0.403	—	1.95
D-Limonene	Skin irritation	1.272	4.056	5.51
Dodecane	Skin and respiratory irritation	1.566	—	1.24
Ethylbenzene	Liver or kidneys problems; increased cancer risk	0.455	0.324	1.11
Ethylcyclohexane	Skin, eye, and respiratory irritation; dizziness and drowsiness; central nervous system problems	—	—	0.25
Heptanal	Skin, eye, and respiratory irritation	0.372	—	1.55
Hexanal	Headache; respiratory, eye, and skin irritation	1.253	—	2.01
M/P-Diethylbenzene	Irritation of skin, nose, and throat; headache, nausea, vomiting, dizziness; liver and kidney damage	0.196	—	0.42
M/P-Ethyltoluene	Eye, skin, and respiratory irritation	2.37	9.475	2.26
m/p-Xylene	Nervous system damage; increased cancer risk	1.348	0.491	1.88
Methyl salicylate	Eye, skin, and respiratory irritation; central nervous system and gastrointestinal problems; liver and kidney damage	0.503	0.473	0.4
Naphthalene	Neurological damage, liver damage, eye damage; increased cancer risk	0.392	0.323	0.53
N-Nonane	Skin irritation, dizziness, liver damage	0.487	—	1.3
N-Octanal	Headache, nausea, dizziness, eye and skin irritation, pulmonary tract irritation, central nervous system problems	3.176	—	2.81
N-Propylbenzene	Skin and eye irritation, headache, nausea, vomiting	0.245	0.112	0.36
Octane	Respiratory, skin, and eye irritation; dizziness and headache	—	—	2.54
O-Diethylbenzene	Respiratory, skin, and eye irritation	0.419	1.224	1.22
O-Xylene	Nervous system damage; increased cancer risk	0.976	0.291	1.43
Pentadecane	Skin and eye irritation	0.433	0.471	0.94
Styrene	Liver, kidney, or circulatory system problems; increased cancer risk	0.333	0.74	0.58
Tetradecane	Nausea, vomiting and diarrhea; central nervous system problems	0.533	0.765	1.54
Toluene	Nervous system, kidney, or liver problems; increased cancer risk	5.575	21.183	16.21
Tridecane	Skin irritation, headache	0.423	0.828	0.6
Undecane	Skin and eye irritation	0.5	0.49	1.3

How to Read Your Results

	Exceeds a level estimated to cause non-cancer health effects over a lifetime
	Exceeds a level of exposure estimated to increase cancer risk by more than 1 in a million
	No state or federal exposure limits available
	Below available exposure limits
	Chemical not found in your air sample

Recommended Exposure Limits

Compounds	RIC, µg/m ³	IUR ×10 ⁻⁶ (µg/m ³)-1	References
1,2,3-Trimethylbenzene	60		EPA
1,2,4-Trimethylbenzene	60		EPA
1,3,5-Trimethylbenzene	60		EPA
Benzene	30	29	EPA, OEHHA
Cumene	400		EPA
Ethylbenzene	1,000	2.5	EPA, OEHHA
Xylenes	10		EPA
Naphthalene	3	34	EPA, OEHHA
Styrene	1,000		EPA
Toluene	5,000		EPA

RIC = Reference Concentration; an estimate of a level of continuous inhalation exposure likely to be without an appreciable risk of harmful non-cancer effects over a lifetime

IUR = Inhalation Unit Risk; an estimate of the level of inhalation exposure that's likely to increase lifetime cancer risk by more than 1 in a million

EPA = U.S. Environmental Protection Agency

OEHHA = California Office of Environmental Health Hazard Assessment

* This list includes findings from both human and animal studies. Having this chemical in your air, water, or body does not necessarily mean that you will experience these health effects.

Sources: EPA, 2009. Risk Assessment Guidance for Superfund (RAGS); Part F, 2009.

https://www.epa.gov/sites/production/files/2015-09/documents/partf_200901_final.pdf Integrated Risk Information System (IRIS) Assessments

<https://cfpub.epa.gov/ncea/iris/search/index.cfm>. Assessed July 4th 2018 The Office of Environmental Health Hazard Assessment (OEHA), Toxicity criteria on chemicals evaluation

U.S. Centers for Disease Control and Prevention, National Institutes of Health, World Health Organization, Agency for Toxic Substances and Disease Registry, European Chemicals Agency New Jersey Department of Health, Chemwatch, Sigma-Aldrich, the Human Metabolome Database, Thermo Fisher Scientific

Water Testing Results for the Latkanich Household

All samples were collected on 7/1/19

Measurements are in parts per billion (ppb)

Chemical	Potential Health Effects*	Your Kitchen Tap	Your Bathtub	Your Outdoor Hose	Median for Our study
Benzene	Anemia; decrease in blood platelets; increased risk of cancer	—	—	—	2.28
2-pentanone	Digestive tract irritation	—	—	—	.
Heptane	Nervous system problems	—	—	5.89	9.36
Methyl Cyclohexane	Irritation of nose, throat, and digestive tract; lung damage	—	—	—	—
Toluene	Nervous system, kidney, or liver problems	—	—	—	23.6
Octane	Irritation of nose, throat, and lungs; headache, dizziness	—	—	—	1.94
Ethyl Cyclohexane	Headache, dizziness, tiredness, nausea, vomiting	—	—	—	1.16
Ethylbenzene	Liver or kidneys problems	—	—	—	1.11
M-xylene	Nervous system damage	—	—	—	0.52
P-xylene	Nervous system damage	—	—	—	0.52
4-heptanone	Irritation of eyes and skin, central nervous system depression, dizziness, drowsiness, decreased breath, liver damage	—	—	—	—
Allyl-isothiocyanate	Irritation of eyes, throat, nose, and skin	—	—	—	—
2-heptanone	Irritation to the skin, eyes, and, respiratory system; headaches, vomiting, and nausea.	—	—	—	—
Styrene	Liver, kidney, or circulatory system problems	—	—	—	—
O-xylene	Nervous system damage	—	1.16	—	1.16
N-nonane	Skin irritation, dizziness, liver damage	—	—	—	4.06
Cumene	Nervous system and kidney problems	—	—	—	—
Propylbenzene	Irritation of eyes nose, throat, and skin; headache, nausea, dizziness, drowsiness	—	—	—	—
M-ethyltoluene	Unknown	—	—	—	—
P-ethyltoluene	Unknown	—	—	—	—
1,3,5-trimethylbenzene	Skin and eye irritation, liver and respiratory damage, anemia	—	—	—	0.97
4-isothiocyanate-1-butene	Unknown	—	—	—	—
1,2,4-trimethylbenzene	Respiratory, nervous, and blood system problems	—	—	—	—
N-decane	Irritation of nose, throat, and lungs; dizziness	—	—	—	—
2-ethylhexanol-1	Irritation of nose, throat, and lungs; dizziness, nausea, headache, nervous system problems	—	—	—	1.47
1,2,3-trimethylbenzene	Nervous system damage	—	—	—	1.12
D-limonene	Eye, skin, and gastrointestinal irritation	—	—	—	1.98
Butyl Cyclohexane	Unknown	1.12	—	1.18	1.13
Diethylbenzenes	Irritation of skin, nose, and throat; headache, nausea, vomiting, dizziness; liver and kidney damage	—	—	—	—
Diethylbenzene Isomer	Unknown	—	—	—	—
N-undecane	Skin and eye irritation	—	1.16	1.18	2.34
1,2,4,5-tetramethylbenzen	Unknown	—	—	1.18	1.09
N-dodecane	Nausea, vomiting, dizziness, weakness, central nervous system and respiratory damage	2.25	3.48	2.36	3.37
Naphthalene	Damage to blood cells, increased cancer risk	4.5	6.96	4.71	5.83
Carvone	Skin irritation	—	—	—	—
Tridecane	Skin irritation, headache	2.25	3.48	2.355	3.21
2-methylnaphthalene	Skin irritation	4.5	9.29	5.888	5.97
1-methylnaphthalene	Skin irritation	2.25	3.48	2.355	3.41
Tetradecane	Nausea, vomiting and diarrhea; central nervous system problems	3.37	4.64	3.533	4.4
Pentadecane	Skin and eye irritation	4.5	5.8	4.711	5.62

How to Read Your Results	
	The level in your water is below all standards
	The level in your water is above at least one standard
	No applicable standard has been set for this chemical
	Chemical not found

Recommended Drinking Water Limits (ppb)

Compound	EPA Standard	PA Standard	WHO Guideline
Benzene	5	5	10
Toluene	1000	1000	700
Ethylbenzene	700	700	300
Xylenes	10,000 total	10,000 total	500 total
Styrene	100	100	20

* This list includes findings from both human and animal studies. Having this chemical in your air, water, or body does not necessarily mean that you will experience these health effects.

Sources:

National Primary Drinking Water Regulations: <https://www.epa.gov/ground-water-and-drinking-water/national-primary-drinking-water-regulations>
 Pennsylvania Department of Environmental Protection: <https://quantumlabs.net/wp-content/uploads/2013/09/DEP-Standards-April-2006.pdf>
 World Health Organization Drinking Water Guidelines: <https://apps.who.int/iris/bitstream/handle/10665/254637/9789241549950-eng.pdf;jsessionid=372CE996160860EC2217C873AB018BD0?sequence=1>
 Agency for Toxic Substances and Disease Registry (ATSDR): <https://www.atsdr.cdc.gov/>
 New Jersey Department of Health Hazardous Substances Fact Sheets: <https://www.nj.gov/health/workplacehealthandsafety/right-to-know/hazardous-substances/>
 Toxicology Data Network: <https://toxnet.nlm.nih.gov/index.html>

Summary of Your Family's Results

I collected a total of three water samples from different locations in your home (all on the same date): The kitchen tap, the bathtub, and the outdoor hose valve.

Both of you wore an active sampling air monitor for periods of 6-8 hours on two separate dates for a total of four air samples.

We collected a total of six urine samples from you and Ryan over three visits, with the first two visits on the same days as the air sample collection.

Urine test results

All six of your urine samples exceeded the U.S. 95th percentile for Mandelic acid, a metabolite for Ethylbenzene and Styrene, and for Phenylglyoxylic acid, a metabolite of Ethylbenzene and Styrene. Four of the six samples exceeded the U.S. 95th percentile for trans, trans-muconic acid, a metabolite for Benzene.

All six of your samples exceeded the U.S. median for Hippuric acid (a metabolite for Toluene and Cinnamaldehyde), Mandelic acid (a metabolite for Ethylbenzene and Styrene), 2-Methylhippuric acid (a metabolite for Xylene), Phenylglyoxylic acid (a metabolite for Ethylbenzene and Styrene), and Trans, trans-Muconic acid (a metabolite for Benzene).

On July 24, 2019 Ryan had a level of hippuric acid in his urine more than 91 times as high as the U.S. median and nearly five times as high as the U.S. 95th percentile. Hippuric acid is a metabolite for Toluene and

Cinnamaldehyde. This was the highest level of hippuric acid detected in anyone in our study.

The same urine sample from Ryan showed a level of mandelic acid nearly 42 times as high as the U.S. median and nearly 13 times as high as the U.S. 95th percentile. Mandelic acid is a metabolite for Ethylbenzene and Styrene. This was the highest level of mandelic acid detected in anyone in our study.

The same day (July 24), Bryan's urine sample had a level of mandelic acid nearly 25 times as high as the U.S. median and nearly eight times as high as the 95th percentile.

On August 19, 2019 Ryan's urine sample showed a level of mandelic acid more than 31 times as high as the U.S. median and nearly 10 times as high as the U.S. 95th percentile; Bryan's was nearly 10 times as high as the U.S. median and three times as high as the U.S. percentile.

The same day (August 19), Ryan had a level of 2-Methylhippuric acid, a metabolite of Xylene, at a level nearly 14 times as high as the U.S. median, nearly five times as high as the median we detected in families in non-fracking regions, and nearly twice as high as the U.S. 95th percentile. At 544 ug/g, Ryan had the highest level of this compound detected in anyone in our study. Bryan's level of the same compound that day was nearly 6 times as high as the U.S. median and nearly as high as the U.S. 95th percentile.

Ryan also had the second-highest level of Phenylglyoxylic acid in his urine of anyone in the study on August 19, 2019. Phenylglyoxylic acid is a metabolite of Ethylbenzene and Styrene. At 3,266 ug/g, Ryan's level of this compound was nearly 16 times as high as the U.S. median and more than six times higher than the U.S. 95th percentile.

The same day (August 19) Ryan had a level of trans, transmuconic acid, a metabolite for benzene, that has nearly 32 times as high as the U.S. median and more than five times as high as the U.S. 95th percentile. On July 24, his level of this compound was nearly 15 times as high as the U.S. median and more than twice as high as the U.S. 95th percentile. On August 5th, Bryan had a level of the same compound that was nearly 14 times as high as the U.S. median and more than twice as high as the U.S. 95th percentile.

Air monitoring results

Regulatory limits exist for just 10 of the 39 chemicals we looked for in your air monitoring samples.

Your air monitoring did not exceed regulatory limits for any of those 10 chemicals.

We can also make some comparisons with other households in the study, but keep in mind that we collected 39 samples from five households, making this a very small sample size.

Ryan's air monitor recorded the highest levels of Benzaldehyde, m/p-Ethyltoluene, and 1-Dodecanol seen in our study on August 5, 2019.

Bryan's air monitor recorded the highest level of 4-Heptanone seen in our study on July 24, 2019.

Water test results

Regulatory limits exist for just five of the 40 chemicals we looked for in your water samples. **Your water samples did not exceed regulatory limits for any of those five chemicals.**

We can also make some comparisons with other households in the study, but keep in mind that we collected 19 samples from five households, making this a very small sample size.

Levels of the following chemicals exceeded the median levels detected in our study: Butyl Cyclohexane (outside sample), N-dodecane (bathtub sample), Naphthalene (bathtub sample), Tridecane (bathtub sample), 2-methylnaphthalene (bathtub sample), 1-methylnaphthalene (bathtub sample), tetradecane (bathtub sample), and pentadecane (bathtub sample).

The levels of all other chemicals detected were either at or below the median levels seen in our study.

EXHIBIT C

Friday, January 19, 2024 at 10:14:32 Eastern Standard Time

Subject: Re: Latkanich
Date: Friday, January 5, 2024 at 8:49:36 AM Eastern Standard Time
From: Lisa Johnson
To: Condo, Kathy K, jenperez@tl4j.com, ansley@tl4j.com, brianward@tl4j.com, erin@tl4j.com, jakob@tl4j.com, mjb@mjbblawoffice.com
CC: Snyder, Joshua S., Phillips, Edward D., Merella, Mary
Attachments: image001.jpg

Hi Kathy – we can stipulate to paragraphs 1,2, 4,12, 16, first sentence of paragraph 19, and first phrase of paragraph 20.

Thanks - Lisa

From: Condo, Kathy K <KCondo@babstcalland.com>
Date: Thursday, January 4, 2024 at 4:38 PM
To: jenperez@tl4j.com <jenperez@tl4j.com>, ansley@tl4j.com <ansley@tl4j.com>, brianward@tl4j.com <brianward@tl4j.com>, erin@tl4j.com <erin@tl4j.com>, jakob@tl4j.com <jakob@tl4j.com>, lisa@lajteam.com <lisa@lajteam.com>, mjb@mjbblawoffice.com <mjb@mjbblawoffice.com>
Cc: Snyder, Joshua S. <JSnyder@babstcalland.com>, Phillips, Edward D. <EPhillips@babstcalland.com>, Merella, Mary <MMerella@babstcalland.com>
Subject: Latkanich

Lisa,

At this time, the record we intend to submit to the Judge on Monday will include the below:

- Chevron Corporation's Supplemental Answers to jurisdictional discovery with attachments
- Deposition transcript of Kari Endries (Deposition exhibits will be included when finalized per the Court Reporter's email to you.)
- Documents produced to Plaintiffs in response to jurisdictional discovery
- Chevron Corporation's jurisdictional Preliminary Objections, with Endries Affidavit
- Plaintiffs' Answer to jurisdictional Preliminary Objections
- List of Chevron Corporation employees (which is included for your information in the below sharefile)
- SEC filings of Chevron Corporation (which are included for your information in the below sharefile)

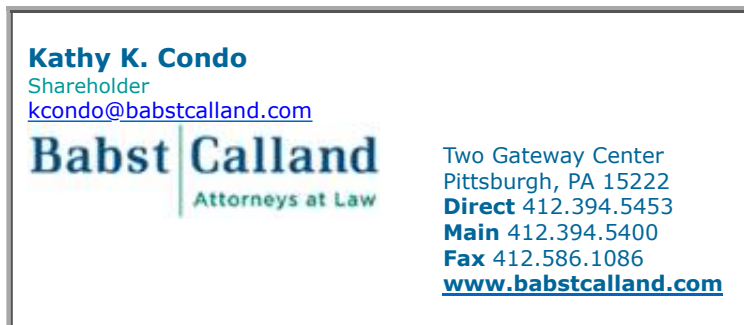
The below sharefile also includes a list of Chevron Corporation's proposed stipulations for you to identify those to which you will stipulate. Please note that we may supplement these with a few additional proposed stipulations tomorrow.

<https://babstcalland.sharefile.com/d-s43e05b375626465f92004111ea0e588e>

As you know, Chevron U.S.A., Inc. collected emails from its custodians in order to conduct an ESI search for potentially responsive documents for production in the EHB and underlying civil suit. This collection resulted in the need to review over 61,500 emails for non-privileged responsive documents. As you are also aware, until the recent stay of the EHB proceeding, these documents were being produced on a rolling basis. In your earlier communication, you expressed the belief that in responding to your jurisdictional discovery requests, Chevron Corporation should have done an ESI search of these emails for any communications between Chevron Corporation and Chevron U.S.A., Inc. Although we do not agree with this position, we have searched these emails for any non-privileged emails that mentioned Latkanich or the Latkanich wells and that included as a recipient or author a Chevron Corporation employee. The below sharefile includes the results of this search (CHEVRON_LATKANICH_0020973 to 0021191). Where the emails included an attached spreadsheet, information related to non-Latkanich assets and references to specific financial information has been redacted. In the below sharefile, we are producing only one copy of each attached spreadsheet. Any other similar versions of the spreadsheets that were attached to the emails will be produced as soon as the necessary redactions can be completed.

<https://babstcalland.sharefile.com/d-sac884f7615464c54bc42ab983ca052ec>

Kathy



CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain confidential information that is legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify the sender. Please destroy the original transmission and its attachments without reading or saving in any manner. Thank you, Babst, Calland, Clements & Zomnir, P.C.

EXHIBIT D

**PLAINTIFFS' DESIGNATION OF CONTENTS OF THE RECORD
(PERSONAL JURISDICTION)**

IN PROGRESS

PLAINTIFFS' STATEMENT OF MATERIAL FACTS

NOW COME PLAINTIFFS, pursuant to paragraph 8 the Court's Discovery Order dated October 11, 2023¹ and file this Statement of Material Facts ("Facts") in support of the Court's exercise of jurisdiction over Defendant Chevron Corporation ("Chevron").

Chevron's Minimum Contacts From 2011 to Present that Support Specific Jurisdiction

1. Chevron completed the \$4.3 billion purchase of assets from Atlas Energy, Inc., a Pennsylvania corporation, in February 2011, which included Plaintiff Bryan Latkanich's Oil and Gas Leases (as defined in the Second Amended Complaint). Tr. 92:16-21.

2. At the time of the announcement of the purchase of the assets from Atlas in February 2011, Chevron's Vice Chairman, George Kirkland stated "The assets provide Chevron with a solid position in the prolific Marcellus Shale, located in Southwestern Pennsylvania, and complement our global position in developing unconventional gas resources."

3. Chevron provided services to Chevron Appalachia, LLC, the operator of the oil and gas operations on the Property while operations were occurring on the

¹ Paragraph 8 of the Order states that "on or before January 8, 2024, the parties shall file submit [sic] a complete record that includes their factual stipulations, deposition transcripts and other documentary evidence that is relevant to the personal jurisdiction issue."

Property. Tr. 58:5-16.

4. Five persons who identified themselves as being employed by Chevron Corporation in their email signatures (“Chevron Employees”) sent email correspondence among themselves, other Chevron subsidiaries, and agents thereof that are specific to Plaintiffs Bryan and Ryan Latkanich and certain matters in the Second Amended Complaint (individually, “Email” and collectively, “Emails”).

5. In the Emails Joseph Miller identifies himself as “Intelligence and Risk Assessment Analyst, Public Affairs, Chevron Corporation, Corporate Affairs” (“Miller”).

6. In the Emails, Isabel Ordonez identifies herself as “Upstream Senior External Affairs Advisor, Policy, Government and Public Affairs, Chevron Corporation” (“Ordonez”).

7. In the Emails, Kent Robertson identified himself as “Manager, Global External Affairs, Policy Government and Public Affairs, Chevron Corporation” (“Robertson”).

8. In the Emails, Morgan Crinklaw identified himself as “Manager, Upstream External Affairs, Corporate Affairs, Chevron Corporation” (“Crinklaw”).

9. Veronica Flores-Paniagua identified herself as “External Affairs Advisor, Americas, Chevron Corporation, Corporate Affairs” (“Flores-Paniagua”).

10. From June 24, 2019 through September 20, 2019, a series of emails

were exchanged between Miller, Flores-Paniagua, Trip Oliver (“Oliver”), and a third-party consultant, FTI Consulting, related to a news piece that CNBC had been working on with respect to the Latkaniches.

11. Oliver’s email signature identifies him as “Manager, Government and Public Affairs, Appalachian Mountain Business Unit, Corporate Affairs, Chevron North America Exploration and Production Company, a division of Chevron U.S.A. Inc.” 0014374

12. FTI Consulting is a management consulting company with offices in Philadelphia, Pittsburgh, and Wayne Pennsylvania.

13. The two FTI Consulting employees who corresponded with the Chevron Employees are Travis Windle (“Windle”) and John Sutter (“Sutter”), both of whom are based in Pennsylvania.

14. On June 24, 2019, Oliver emailed Veronica Flores-Paniagua to find out the name of the Pennsylvania doctor that was referenced in an article that was published by the Pittsburgh Post-Gazette who had diagnosed Plaintiff Ryan Latkanich with hydrocarbon exposure and radiation exposure, Dr. Abesamis at UPMC. 0014210

15. Oliver then contacted Windle at FTI Consulting to obtain additional information about Dr. Abesamis.

16. Windle provided Oliver with information about Dr. Abesamis.”

17. Oliver sent Miller the email from Windle and requested that Miller perform additional research into Dr. Abesamis and any other likely Pennsylvania residents.

18. Oliver, in discussing how to correspond with the Pittsburgh Post-Gazette reporter stated that “If we bring those conflicts to [the reporter’s] attention before the story runs, doesn’t that lay the groundwork for us to discredit the story later?”

19. On July 25, 2019, Oliver emailed Sutter and requested that FTI Consulting advise the Pittsburgh Post-Gazette that “Dr. Abesamis has known connections to anti-O&G activist groups and is not an unbiased voice.”

20. Sutter responded, “Absolutely – will make that (along with Stolz and PSR activists) clear in our Fact Check update too.”

21. “Stolz” refers to Dr. John Stolz, a scientist and professor at Duquesne University in Pittsburgh, Pennsylvania who provided free water testing to Plaintiff Bryan Latkanich.

22. On September 20, 2019, Oliver emailed Flores-Paniagua regarding using the information gathered by Miller and FTI Consulting in comments “about the toxicologist.”

23. Chevron used its platform to disseminate information about the issues presented in this matter.

24. Chevron entered into the agreement with EQT to sell certain assets that included Plaintiff Bryan Latkanich's Oil and Gas Leases.

25. Representatives from the DEP and "Chevron" representatives, including Rosenthal (defined below) were present at one or more with Mr. Latkanich in 2019.

- a. Attendees to one of the meetings signed under "Chevron."
- b. Persons on the attendance list all have a Chevron.com email.
- c. Representatives held themselves out as being employed by "Chevron" and did not distinguish between Chevron USA Inc. or Chevron Appalachia LLC.
- d. Mr. Latkanich was not advised to obtain counsel prior to the meetings, nor was he permitted by the "Chevron" representatives to bring another person into the meetings with him.

Chevron's Minimum Contacts that Support General Jurisdiction

26. Plaintiffs incorporate the foregoing paragraphs as if fully set forth herein.

27. The Chairman and CEO of Chevron as well as the Secretary of Chevron traveled to Pennsylvania at some point between 2011 to present. Tr. 80:18-81:2.

28. The Chevron Board of Directors occasionally travel to view its

“investments.” Tr. 80:18-25, 81:1-25.

29. The Chevron Board of Directors visited Pennsylvania on September 29 and 30, 2015. *Id.*

30. Specifically, Chevron’s CEO (Mike Wirth), General Counsel (Hew Pate), and the Corporate Secretary (Mary Francis) were present during the Board of Directors’ visit. Tr. 82:19-23.

31. While in Pennsylvania, the Chevron Board of Directors visited the Appalachia Mountain Business Unit (“AMBU”). *Id.*, Tr:82:1-25.

32. Chevron shares 6 of the same officers, one of whom is on the Board of Directors at Chevron U.S.A., Inc., which is a Pennsylvania entity: Kari H. Endries, Paul R. Antebi, Wayne P. Borduin, Jeff B. Gustavson, M.T. Reilly, and Troy S. Lee. Tr. 23:16-28:4.

33. Chevron did not provide the organizational chart or list any officers or directors for Chevron Appalachia prior to it being sold to EQT.

34. Chevron acted as a guarantor to Defendant Chevron U.S.A., Inc. (a Pennsylvania corporation) in the issuance of over \$5 billion in debt securities. Tr. 68:23-70:1; Tr. 139:12-140:11.

35. Officers of Chevron U.S.A., Inc. (a Pennsylvania entity), gave powers of attorney to officers of Chevron in connection with the guaranty. Tr. 84:24-85:21.

36. Chevron made statements to the Securities and Exchange Commission

regarding the subject assets and its operations in Pennsylvania on August 3, 2011 and April 24, 2014 (“SEC Statements”). Tr. 110:10-111:11; 134:7-138:9.

37. Chevron acquired additional acreage in Pennsylvania from Chief Oil & Gas on June 28, 2011. Tr. 114:24-115:4.

38. Chevron entered into an Intercompany Counsel and Service Agreement with Defendant Chevron U.S.A., Inc. and Certain Affiliates of Chevron Corporation effective as of January 1, 2021 (“2021 Agreement”). Tr. 34:15-17

39. Chevron provided corporate functions to Defendant Chevron U.S.A., Inc. pursuant to the 2021 Agreement for which Chevron is compensated. Tr. 34:22-35:3; 74:13-22.

40. Chevron entered into a Counsel, Service, and Support Agreement with Defendant Chevron U.S.A., Inc. on February 1, 2022 (“2022 Agreement”). Tr. 40:11-25.

41. Chevron provides additional corporate functions to Defendant Chevron U.S.A., Inc. pursuant to the 2022 Agreement, including governance, treasury, human resources, insurance, financial, auditor interface, contract and legal matters, preparation of budgets and programs, purchasing and shipping of materials, supplies, and equipment, coordination of operations, solution of technical operational problems, geological and geophysical services, research, engineering, construction, and shared facilities. Tr. 41:4-7; 49:20-50:25.

42. Chevron's Assistant Treasurer is an officer of other Chevron subsidiaries because Chevron's Assistant Treasurers are subject matter experts. Tr. 54:9-24.

43. Endries testified that she may be on other Chevron subsidiaries as Secretary or Assistant Secretary because she is a subject matter expert and it is more efficient for her to provide these services than to hire someone else. Tr. 54:19-24.

44. With respect to Chevron's agents, Endries testified that Chevron "doesn't ask any party to act on its behalf" even though Chevron arranges services with third parties pursuant to the 2022 Agreement. Tr.48:7-14; 50:20-53:1; Tr. 75:4-78:17.

45. Endries did not look at the loan documents underlying the guaranty and therefore was unable to provide information related to the use of funds. Tr. 73:25-74:5.

46. Defendant Chevron Appalachia no longer exists as a corporate entity in Pennsylvania.

47. Chevron's subsidiaries use Chevron's logo.

48. Persons employed by Chevron and its subsidiaries use "chevron.com" for their email addresses.

49. Chevron sold its investment that it purchased from Atlas, including the Latkanich Oil and gas Leases, to EQT in October 2020.

CHEVRON FAILED TO SUPPLEMENT ITS DISCOVERY RESPONSES CONSISTENT WITH THE COURT’S ORDER

50. The Court issued a Discovery Order October 11, 2023.

51. The Discovery Order ordered Chevron to respond to Plaintiffs’ discovery requests with respect to agents.

52. Chevron did not provide discovery responses with respect to agents.

53. Chevron produced documents relative to Chevron and the personal jurisdiction issue in a parallel proceeding in front of the Environmental Hearing Board one day after Endries’ deposition.

PLAINTIFFS’ DEPOSITION OF CHEVRON’S CORPORATE DESIGNEE

54. Endries’ remote deposition occurred on December 6, 2023.

55. Present with Endries at the deposition were Alan Rosenthal, an attorney employed by Defendant Chevron U.S.A., Inc. (“Rosenthal”) and Frank Stewart, an attorney employed at the law firm of Jones Day (“Stewart”). Tr. 6:12-25.

CHEVRON FAILED TO PRODUCE A PREPARED CORPORATE DESIGNEE

56. Chevron produced Kari Endries, Assistant Secretary and Managing Counsel (“Endries”) as the corporate designee for deposition. Tr. 12:9-13.

57. Endries spent only 7 hours preparing for the deposition and was not prepared to answer certain questions on the noticed topics. Tr. 20:17-22; Tr. 122:19-

123:5; 142:3-166.

58. Endries is and was an officer for Chevron and Defendant Chevron U.S.A., Inc. while operations were occurring on the Property. Tr. 23:11-15.

59. Endries was also the Secretary of Defendant Chevron Appalachia, LLC while operations were occurring on the Property, from 2011 through 2020. Tr. 59:7-23; 60:24-61:1.

60. The SEC Statements, that Endries had no familiarity with prior to the corporate designee deposition, were attached to Plaintiffs' Motion to Compel.

61. Endries testified in her deposition that she was not provided with and had not seen the SEC Statements.

62. Endries testified in her deposition that she only had conversations with legal counsel to prepare for the deposition. Tr. 12:19-13:2.

63. Chevron failed to include subsidiaries of Defendant Chevron U.S.A., Inc. and Endries was not prepared to answer questions regarding subsidiaries. Tr. 30:14-24.

64. Endries testified that she did not have an answer to whether there may have been prior intercompany agreements and had not inquired with others within Chevron other than legal counsel for shared services agreements. Tr. 35:4-36:7; Tr. 123:22-

65. Endries did not know and did not search for copies of agreements with

third parties that arose from the 2022 Agreement. Tr. 53:13-25.

66. Endries was the Secretary of Defendant Chevron Appalachia, LLC from 2011-2020 yet testified that she had no knowledge of “how the business portion of Chevron Appalachia worked or collected information.” Tr. 62:7-10; Tr. 78:9-25.

67. Endries did not do any preparation prior to her deposition as the corporate representative related to identifying shared services between Chevron and Chevron Appalachia, LLC. Tr. 62:11-16; Tr. 94:1-16.

68. Endries did not know how much debt for which Chevron has acted as guarantor for Defendant Chevron U.S.A., Inc. Tr. 70:2-6.

69. Endries testified that she had only a “limited understanding” of the Lanco Incident involving Chevron Appalachia, and located in Pennsylvania, which occurred in 2014 and involved a worker that was killed on one of its wellsites. She testified she “read in the news that there was an explosion, and that’s about all” and could not identify the entity that paid a fine to the Pennsylvania Department of Environmental Protection. Tr. 96:1-101:3; Tr. 131:22-133:25.

70. Endries testified that no corporate policies changed after the Lanco Incident. Tr. 102:13-20.

71. Endries testified that she did not know what other investments Chevron Corporation had in Pennsylvania in 2015 at the time of the Board visit. Tr. 121:23-

122:2.

72. Endries testified in her deposition that she had not received a copy of the letters or documents surrounding the guaranty. Tr. 72:1-8.

PLAINTIFFS' DESIGNATION OF WITNESSES FOR HEARING

1. Kari Endries
2. Alan Rosenthal
3. Mike Wirth
4. Hew Pate
5. Mary Francis
6. Trip Oliver
7. Joseph Miller
8. Veronica Flores

Respectfully submitted,

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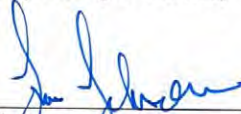
877 S Victoria Avenue, Suite 201
Ventura, California 93003

Dated: January 8, 2024

CERTIFICATION OF COMPLIANCE
REGARDING CONFIDENTIAL INFORMATION

I certify that this filing complies with the provisions of the Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts that require filing confidential information and documents differently than non-confidential information and documents.

Respectfully submitted,



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Phone: 412-913-8583
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Dated: January 8, 2024

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served upon Defendants' counsel via electronic mail, this 8th day of January 2024.

BABST, CALLAND, CLEMENTS
and ZOMNIR, P .C.

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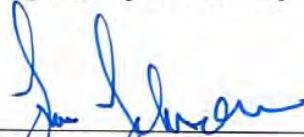
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Respectfully submitted,



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Pittsburgh, PA 15217

Phone: 412-913-8583

lisa@lajteam.com

VERIFICATION

1. *My name is Bryan Latkanich and I am over eighteen years of age.*
2. *I am a plaintiff in the above-captioned case and I am familiar with the contents of the Statement of Material Facts filed herewith.*
3. *The specific averments of facts contained in the Statement of Material Facts are true based on my personal knowledge, and/or reasonable information and belief.*
4. *I make this verification on behalf of myself and my minor child and plaintiff, Ryan Latkanich.*
5. *I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.*



Bryan Latkanich

Dated: January 8, 2024

VERIFICATION

1. *My name is Hunter Latkanich and I am over eighteen years of age.*
2. *I am a plaintiff in the above-captioned case and I am familiar with the contents of the Statement of Facts filed herewith.*
3. *The specific averments of facts contained in the Statement of Facts are true based on my personal knowledge, and/or reasonable information and belief.*
4. *I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.*


Hunter Latkanich

Dated: January 8, 2024

VERIFICATION

1. *My name is Colton Latkanich and I am over eighteen years of age.*
2. *I am a plaintiff in the above-captioned case and I am familiar with the contents of the Complaint filed herewith.*
3. *The specific averments of facts contained in the Complaint are true based on my personal knowledge, and/or reasonable information and belief.*
4. *I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.*



Colton Latkanich

Dated: January 8, 2024

EXHIBIT E

POWERING THE FUTURE

POWERING THE FUTURE

Chevron CEO defends massive write-down, saying good performance ‘isn’t good enough’

PUBLISHED WED, DEC 11 2019-9:09 AM EST | UPDATED WED, DEC 11 2019-AT 12:19 EST



Jessica Bursztynsky
@JBURSZ

SHARE    

KEY POINTS

Chevron’s Michael Wirth defends the energy giant’s expected fourth-quarter write-down of up to \$11 billion of assets, saying that while “business is good,” it could be better.

“Good isn’t good enough,” Wirth says.

The nation’s second-largest oil company is also considering selling some natural gas projects and may sell shale gas properties.

RELATED





VIDEO 10:37

Watch CNBC's full interview with Chevron CEO Michael Wirth

[Chevron](#) Chairman and CEO Michael Wirth defended the energy giant's expected fourth-quarter write-down of up to \$11 billion of assets, saying that while "business is good," it could be better.

"Good isn't good enough," Wirth said on CNBC's ["Squawk Box."](#)

Chevron said on Tuesday it plans to [write down](#) the value of its assets by \$10 billion to \$11 billion in the current quarter, relating to a deepwater Gulf of Mexico project and shale gas in Appalachia. The nation's second-largest oil company is also considering selling some natural gas projects and may sell shale gas properties.

"We regularly take a look at long-term outlook for commodity markets," Wirth said. "As we do that, we also look at assets and which will deliver the highest returns on investment for our shareholders."

Wirth added that the company's assets in the U.S. Northeast, and some in Canada, "simply don't compete as well for our investment dollar as others do."

California-based Chevron has said it plans to hold its



Elon Musk says the tech is 'mind-bogglingly stupid,' but hydrogen cars may yet threaten Tesla



Solar power can boost your home's value — especially in these 10 states



An \$11 trillion global hydrogen energy boom is coming. Here's what could trigger it



Jeff Bezos names first recipients of his \$10 billion Earth Fund for combating climate change



Why Tesla's solar business has not yet taken off as Elon Musk promised

2020 spending program at \$20 billion, joining other energy firms in restraining spending after the collapse in oil prices earlier this decade.

Wirth noted that the \$20 billion price tag is a hefty cost, but said that it's been cut in half over the past



Chevron CEO defends massive write-down, saying good performanc...

SHARE



“We’ve actually brought our spending down as commodity markets reset — and I like to tell our people, in a commodity business, capital discipline always matters and cost discipline always matters,” he added.

The company plans to [spend \\$4 billion next year](#) in the Permian Basin, the top U.S. oil field in Texas and New Mexico, and another \$1 billion on international shale projects. It had planned to spend around \$5.2 billion this year.

Chevron will also spend \$2.8 billion on its business that refines, transports and markets fuels and petrochemicals, up about \$300 million from this year’s budget.

Last month, Chevron, which has been a strong performer among the oil majors, reported a [36% drop](#) in third-quarter profit, hit by lower oil and gas prices and refining margins. It also warned higher costs would affect fourth-quarter results.

— [Reuters](#) contributed to this report.

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EXHIBIT F



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

Meeting Log
California District Office
25 Technology Drive, Coal center PA 15423

Date: 11-Jun-19

Purpose: Latkanich & Chevron 3251 Conference

Name	Organization	Telephone	eMail
Daniel Counahan	PA DEP BOGM	(412) 442-4006	dcounahan@pa.gov
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<i>Byron Leckowich, Self</i>		<i>724-267-4377</i>	
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Meeting Attendance Roster

California District Office

AG's office
412-526-8073

Date: 20-Jul-16 Company: Chevron

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<i>Brycen Laikovich</i>	<i>handover</i>	<i>724-267-4377</i>	

Dave McDerrott

EXHIBIT G

2. I am currently board certified in Internal Medicine and Cardiovascular Diseases, and have been so since 1980 through the present.

3. I practice in Pittsburgh, Pennsylvania and Plaintiff, Bryan Latkanich, is currently my patient. I have treated Mr. Latkanich for over twenty (20) years as both his primary care physician and cardiologist.

4. I am familiar with Mr. Latkanich's health history and have had the opportunity to review recent medical records of Mr. Latkanich.

5. In addition to my own treatment of Mr. Latkanich, I am aware that Mr. Latkanich has been assessed by several cardiologists.

6. Mr. Latkanich has been diagnosed with a significant ischemic congestive cardiomyopathy. As a result, Mr. Latkanich is suffering from congestive heart failure and his heart has an extremely low injection fraction.

7. I am personally aware that Mr. Latkanich has been admitted to the hospital several times over the last year, including in March and October 2023.

8. Mr. Latkanich's last visit to my office was on October 31, 2023, at which time he underwent a routine check of markers related to his heart failure.

9. Mr. Latkanich also recently underwent surgery to simultaneously insert pacemakers into two chambers of his heart in order to try and increase the injection fraction. Even with the pacemakers, Mr. Latkanich has an extremely low injection fraction.

10. As a cardiologist, I know that people with extremely low injection fraction have a high risk of suffering from sudden death. For example, Mr. Latkanich can go into heart failure with even a minimally elevated intake of salt or suffer a sudden cardiac arrhythmia leading to death.

11. In addition, Mr. Latkanich suffers from a number of other diseases that increase his risk of sudden death. Most significant of those other diseases is that Mr. Latkanich has been diagnosed with polycystic kidney disease. Polycystic kidney disease causes Mr. Latkanich's kidney function to progressively decrease over time.

12. As of November 2023, Mr. Latkanich is in stage IV renal failure. His most recent tests in approximately the same time frame indicate that Mr. Latkanich only has approximately twenty percent (20%) of his normal kidney function.

13. Unfortunately, as Mr. Latkanich's kidney function decreases, it puts additional stress on his heart, which further increases his risk of sudden death. As Mr. Latkanich's kidney function decreases, he accumulates more water in his body. The accumulation of water causes his heart to dilate, which in turn stretches his heart, decreasing his heart function. The dilation of his heart additionally causes less blood flow to go to his kidneys, which then further causes his kidney function to decrease. This vicious cycle is referred to as cardiorenal syndrome. While medications are prescribed to try and stabilize this syndrome, ultimately it is a no-win cycle.

14. Mr. Latkanich has been proscribed with a very potent heart failure regimen including Entresto and beta blockers. He is also on a lipid lowering therapy, nitrates, and hydrocortisone, among other medications for his heart.

15. In addition to the above, over ten years ago, Mr. Latkanich had brain surgery for what is called a pituitary adenoma. As a result, Mr. Latkanich has no function of his pituitary and he needs to take steroids, testosterone and thyroid medications.

16. Mr. Latkanich also suffers from chronic gout.

17. Without overwhelming the Court, it is enough to say that Mr. Latkanich presents with very complicated health risks. In my medical opinion, he is at high risk of sudden death. That risk is only heightened by the fact that he has so many diseases that interact with one another, impacting his overall health and increasing the stress on his failing organs.

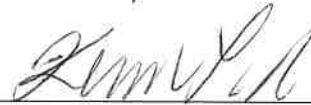
18. Additionally, based on Mr. Latkanich's complicated health conditions, he is not a candidate for coronary bypass or an organ transplant.

19. Based on what I personally know from treating Mr. Latkanich, his health history and his current health condition, Mr. Latkanich is at a high risk of sudden death. Unfortunately, Mr. Latkanich's current treatment and medication regimen can only do so much. At this point, the question is not if Mr. Latkanich will die prematurely from his underlying health conditions, but when.

20. All of the opinions rendered herein are to a reasonably degree of medical certainty.

I, Kenneth H. Lentz,, being duly sworn upon oath, according to law, do hereby affirm that the facts contained in the foregoing Declaration are true and correct, to the best of my knowledge, information and belief and that this Declaration is made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Executed this 4 day of JUN, 2024



Kenneth H. Lentz, M.D.