

Melissa Wipf

From: James E. Moore
Sent: Tuesday, April 07, 2015 9:53 AM
To: trealbird@ndnlaw.com
Cc: Melissa Wipf; William Taylor
Subject: Keystone XL discovery

Thomasina,

Thanks for your letter of April 1, 2015. We have the following responses to your discovery concerns.

Interrogatory No. 10: The identity of the persons conducting surveys is not relevant or reasonably calculated to lead to the discovery of admissible evidence. The Department of State was satisfied with the surveys conducted.

Interrogatory No. 13: Keystone has not hired any environmental inspectors for KXL. There is no additional information that we can provide.

Interrogatory No. 15: Keystone has not hired any contractors for KXL. We will stand on the objection that information related to contractors on other projects is not relevant or likely to lead to the discovery of admissible evidence..

Interrogatory No. 16: Keystone has not hired any contractors for KXL. We will stand on the objection that information related to contractors on other projects is not relevant or likely to lead to the discovery of admissible evidence.

Interrogatory No. 21: Keystone stands on its objection.

Interrogatory No. 32: Keystone will provide latitude/longitude information for the camps in South Dakota. I'll get that for you yet today.

With respect to the document requests, Keystone stands on its objections and responses.

Please advise if you have any further questions or comments.

James

