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STATE OF WASHINGTON
WHATCOM COUNTY SUPERIOR COURT

STATE OF WASHINGTON,
DEPARTMENT OF ECOLOGY,

Plaintiff,

v.

TRANS MOUNTAIN PIPELINE
(PUGET SOUND) LLC,

Defendant.

NO. 14 2 01294 9

DECLARATION OF ROBERT W.
WARREN

I, Robert W. Warren, declare as follows:

1. I am over 21 years of age and am competent to testify herein. The facts set forth in this Declaration are from my personal knowledge.

2. I have been employed by the Washington State Department of Ecology (Ecology) for 25 years. Since 2007, I have been Ecology's Toxics Cleanup Program Section Manager for Ecology's Northwest Regional Office. As Section Manager for the Northwest Region, I am responsible for the oversight and management of contaminated sites in the region, including the Laurel Station Site. I am therefore knowledgeable about matters related to this Site.

3. The Site is located near Bellingham, Washington.

1 4. Ecology has determined that a release or threatened release of hazardous
2 substances has occurred at the Site.

3 5. Ecology has determined that contamination at the Site presents a threat to human
4 health or the environment.

5 6. Ecology has given notice to the Trans Mountain Pipeline (Puget Sound) LLC of
6 Ecology's determination that it is a potentially liable person (PLP) for the Site, as required by
7 RCW 70.105D.020(26) and WAC 173-340-500.

8 7. The draft Consent Decree and draft Cleanup Action Plan were available for
9 public comment between April 18, and May 19, 2014. Ecology has determined that no
10 additional public comment is required.

11 8. Ecology has determined that the actions to be taken pursuant to the Consent
12 Decree are necessary to protect public health and the environment, and will lead to a more
13 expeditious cleanup of hazardous substances at the Site in compliance with cleanup standards
14 established under RCW 70.105D.030(2)(e) and WAC 173-340.

15 I declare under penalty of perjury of the laws of the state of Washington that the
16 foregoing is true and correct.

17 DATED this 2 day of June 2014, in Bellevue, Washington.

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21 ROBERT W. WARREN

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