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ROGERS JOSEPH O'DONNELL

February 6, 2020

VIA E-MAIL AND U.S. MAIL

(frank.winslow@ecy.wa.gov)

Frank P. Winslow
State of Washington Department of Ecology
Toxics Cleanup Program
Central Regional Office
1250 Alder Street
Union Gap, WA 98903

Re: DeBock's Main Street Texaco (aka Debock's Auto Repair)
100 W., 101 E., and 101 W. Wine Country Road, Grandview, WA
Facility Site ID: 94369212
Cleanup ID: 23092312463

Dear Mr. Winslow:

I represent Chevron Environmental Management Company ("CEMC") and Chevron U.S.A. Inc. ("CUSA"). I write in response to the Washington Department of Ecology's letter of November 26, 2019 ("PLP Notice"), which proposes to find "Chevron Corporation (Chevron) liable under RCW 70.105D.040 for the releases at the DeBock's Main Street Texaco Site." The PLP notice identifies other PLPs, although we address only the PLP Notice as it relates to Chevron Corporation.

The PLP Notice proposes to name Chevron Corporation as a PLP based on the assumption that Chevron Corporation is a successor to Standard Oil Company of California, which is alleged to have leased property at 101 East Wine Country between 1937 and 1945 and owned property at 101 W. Wine Country Road prior to March 29, 1967.

As a preliminary matter, any liabilities of Standard Oil Company of California relating to these properties would now rest with CUSA, not Chevron Corporation. Thus, on the facts alleged in your letter, CUSA would be the appropriate PLP. Furthermore, we are unaware of any facts supporting the assertion that Standard Oil Company of California leased the property at 101 East Wine Country Road at any time.

Frank Winslow
State of Washington Department of Ecology
February 6, 2020
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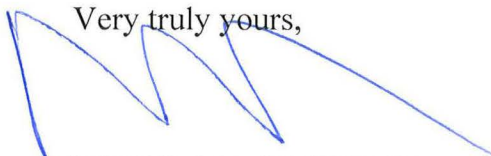
Accordingly, Chevron Corporation challenges its designation as a PLP because it is not the successor to Standard Oil Company of California with regard to the referenced properties. Further, even if it were, there are no facts supporting the assertion that Standard Oil Company of California leased the property at 101 East Wine Country Road.

CEMC, on behalf of CUSA, and without admitting liability, accepts designation as a PLP in connection with the property at 101 W. Wine Country Road.

Please contact me if you have any questions or need additional information.

Thank you.

Very truly yours,



ROBERT C. GOODMAN

RCG:jm