

TGG: JGE: AMAG: RF
XF:

TO: Distribution

FROM: Tom Grumbles
DATE: September 16, 1985

Interoffice
Communication

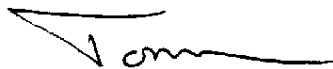
SUBJ: STIPULATED PENALTIES AGREEMENT

Ask OK.
JGE
BET

VISTA

Enclosed is the final Stipulated Penalties Agreement outlining payment policy and procedures we will follow in obtaining reimbursement costs for capital projects related to the VCM Consent Decrees.

To date we have reached basic agreement on capital projects to be included in the compliance plans.



Thomas G. Grumbles

ajo/7

Enclosure

Distribution:

R. A. Conrad
J. Friend
R. D. Gamblin
H. D. Garrison
D. Hansen
H. Kramer
D. A. Kuhn
R. E. Lehmkuhl
J. Stoner

VVV 000016647

TGG: ~~JEL~~: MME: RF~~XP~~ MME copy

September 13, 1985

VISTA

Mr. Gary Garber
Offshore Mud Movers
P.O. Drawer 53508
Laffayette, LA 70505

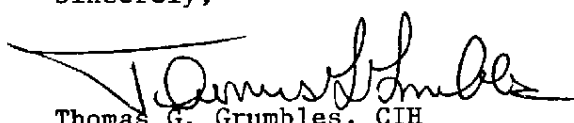
Dear Gary:

This letter is to verify the proper transportation classification for Vista ODC Drilling Fluid Base Oil. As you are aware, ODC has a minimum flash point of 144°F. It exhibits no other DOT defined hazards. As such, the DOT hazard class for ODC is combustible liquid. The proper shipping name for ODC is Petroleum Oil, N.O.S. with a DOT I.D. number of NA1270.

As we discussed, if a material has a flash point above 141°F and exhibits no other hazards it would not be regulated for international shipments, and therefore, not have a UN number or IMO hazard class for transportation purposes. This is the situation for ODC. Unfortunately, in this case, there is a UN1270 designation for petroleum oils as well. This number would be for petroleum oils with a flash point below 141°F. If the 1270 number is seen without the appropriate prefix one would properly assume the material to be a hazardous substance for international and IMO shipments. Also for air shipments of ODC drums, the product is considered an unrestricted (non-regulated) article.

I trust the information above will help resolve the confusion over the classification of Vista ODC Drilling Fluid Base Oil. Please call me at 713-531-3445 if you have questions on the above.

Sincerely,



Thomas G. Grumbles, CIH
Environmental Quality Manager

ajo/7

cc Tom Randolph
Bill McClain
Garland Smith

VVV 000016648