



September 1, 2015

Eurika Durr
Clerk of the Board
U.S. Environmental Protection Agency
Environmental Appeals Board
1201 Constitution Avenue NW
WJC East, Room 3332
Washington, D.C. 20460-0006

Via Electronic Filing

Re:

Land O'Lakes, Inc. (Hudson Oil Refinery Superfund Site)

Docket Number: 06-16-08

Appeal Number: CERCLA 106(b) 15-01

Dear Ms. Durr:

This is in response to your letter dated August 18, 2015 regarding participation in the voluntary alternative dispute resolution ("ADR") program of the Environmental Appeals Board ("EAB"). Land O'Lakes respectfully declines to participate in the ADR Program and wishes the above matter to remain on the EAB's docket for resolution.

I have informed Mr. Malone of this decision by telephone voice mail and by copy of this letter.

Thank you.

Very truly yours,

STINSON LEONARD STREET LLP

BYRON E. STARNS

cc: George Malone

Mark E. Johnson Mark D. Coldiron Stephen J. Jantzen