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October 22, 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,**  
**E-MAIL & U.S. MAIL**

**Re: Land O'Lakes, Inc. (Hudson Oil Refinery Superfund Site)**  
**Docket Number: 06-16-08**  
**Appeal Number: CERCLA 106(b) 15-01**  
**Courtesy Notice of Retention of Substitute Expert**

Dear Ms. Durr:

As a courtesy, Land O' Lakes, Inc. ("Land O' Lakes") respectfully files this notice of the retention of Dr. B. Tod Delaney as a substitute expert witness for D. Keith Baugher. Mr. Baugher was forced to end his service as an expert witness for Petitioner Land O' Lakes due to his health conditions, as described in Land O' Lakes pending Motion for Additional Time to Retain Substitute Expert Witness and File Supplemental Expert Witness Affidavit, and Suggestions in Support, dated August 18, 2015.

Dr. Delaney was retained on or before October 1, 2015, as specified in the parties Agreed Motion to Stay Proceedings and to Extend Time for the Petitioner to Retain an Expert and File a Supplemental Affidavit, dated September 15, 2015. Dr. Delaney is working on his supplemental affidavit and it will be completed in time for filing on or before January 18, 2016.

Thank you.

Very truly yours,

STINSON LEONARD STREET LLP

A handwritten signature in blue ink, appearing to read "Byron E. Starns", written over the printed name.

BYRON E. STARNs

cc (via email and U.S. Mail): Clarence Featherson, US EPA  
Lee R. Tyner, US EPA  
George Malone, US EPA

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

**CERTIFICATE OF SERVICE**

Pursuant to Revised Guidance on Procedures for Submission and Review of CERCLA Section 106(b) Reimbursement Petitions, Environmental Appeals Board (February 23, 2012), the undersigned hereby certifies that the above and foregoing was electronically filed with the Clerk of the Environmental Appeals Board on this 22th day of October, 2015. In addition, on this same date, a true and correct copy was sent by U.S. Mail to the following:

George Malone  
U.S. Environmental Protection Agency  
Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202

Clarence Featherson  
Office of Enforcement and  
Compliance Assurance  
U.S. EPA (2272A)  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Lee R. Tyner  
Office of General Counsel  
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Attorney for the Petitioner