

United States Senate

WASHINGTON, DC 20510

May 2, 2018

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Dear Administrator Pruitt,

It has come to our attention that the Office of the Oklahoma Attorney General (OK AG) is currently withholding from public production at least 3,100 pages of documents related to communications with fossil fuel and other industry groups that may have interests before the U.S. Environmental Protection Agency (EPA). This remarkable number of documents, which coincide with your time as Oklahoma Attorney General, were never disclosed to the Senate Environment and Public Works (EPW) Committee and raise new questions about your ability to execute the functions of your office impartially. Further, the existence of these documents likely makes the recusal statement you have filed with EPA incomplete.

The documents at issue have been identified by the OK AG as responsive to a series of requests under the Oklahoma Open Records Act by the Center for Media and Democracy. They include requests for communications with over forty companies, law firms, and individuals that have either direct or indirect interest in matters before EPA.¹ The Oklahoma Attorney General has described the documents to the state court currently handling the litigation over these open records requests as follows:²

1,122 pages of “emails containing documents, amicus briefs, and legal strategy which are part of litigation files,”

1,754 pages of “emails containing documents, drafts of proposed rules, pleadings and drafts, legal strategy and data from investigations for cases in litigation,” and

196 pages of “emails regarding personal matters not related to the transaction of public business.”

¹ The full list of groups includes: Republican Attorneys General Association, Rule of Law Defense Fund, AG’s United for Clean Power, Peabody, Arch Coal, Murray Energy, National Coal Corporation, ACCCE, American Coal Council, National Mining Association, Union Pacific Railroad, BNSF Railway, EEI, Devon Energy, Norfolk Southern, American Electric Power, Koch Industries, AFP, ALEC, Jeffersonian Project, API, CEA, HBW Resources, Oklahoma Council of Public Affairs, GOPAC, Freedom Partners, Natural Resources Group, AFPM, Hunton and Williams, Sargent and Lundy, Porter Wright Morris and Arthur, Troutman Sanders LLP, CEI, Exxon, DCI Group, Haynes and Boone LLP, Cantey Hanger LLP, Paul, Weiss, Rifkind, Wharton and Garrison LLP, Eric Schneiderman, Claude Walker, Hunton and Williams LLP, Sam Kazman, Kent Lassman, SPN, Chris Horner, David Schnare and E&E Legal.

² Index of Non-Produced Materials for the Court’s In Camera Review Only, dated February 21, 2017 (attached). It is our understanding that Plaintiff asked repeatedly for an index of the withheld documents, but did not get one until the court finally ordered the OK AG, on January 30, 2018, to produce one within 30 days. The index was provided to Plaintiff on March 12, 2018.

Each of these categories of documents may contain information directly relevant to your ability to do your job impartially. For example, while you have agreed to recuse yourself from decisions related to litigation involving the State of Oklahoma as a “party, petitioner, or intervenor,”³ the 1,122 documents identified by the OK AG as “part of litigation files” cover parties beyond the State of Oklahoma and could indicate your recusal list is incomplete. Another 1,754 pages of emails have been described as including “drafts of proposed rules” and “data from investigations for cases in litigation.” If you, as Attorney General, reviewed industry-produced drafts of EPA rules or industry data to be used in litigation against the EPA, that would raise serious concerns. In particular, your review of industry-produced drafts raises doubt about whether you are approaching your responsibilities in an open-minded way. Other interests should be assured that you are willing and able to consider evidence and viewpoints made available to you in your role as Administrator,⁴ and that you are not considering industry-produced data outside of the formal rulemaking process.

Finally, we trust that the plaintiff in this open records act litigation will aggressively litigate whether you waived privilege when you shared litigation documents with private non-parties. Further, we expect the plaintiff to address the far-fetched claim that 196 pages of communications with entities that may include Koch Industries, Devon Energy, and the Republican Attorneys General Association are “not related to the transaction of public business” and, therefore, not subject to disclosure under Oklahoma law. For the purposes of Senate oversight, and your compliance with federal ethics regulations and the Administrative Procedures Act, such documents should be public as they involve your actions as EPA Administrator.

The fact that you were confirmed without the Senate knowing about many of your industry communications is not new. You directed members of the EPW Committee to file Open Records Act requests of your office at least twelve times in response to questions for the record.⁵ Now that it has become evident that the OK AG intends to assert privilege over many of these documents and aggressively litigate those claims, we may have to wait another year before we discover the full scope of your industry ties and how they have impacted your actions as EPA Administrator.

³ https://www.eenews.net/assets/2017/05/05/document_pm_06.pdf


⁴ The question of whether or not you have an inalterably closed mind with respect to certain matters before EPA has already been raised in the context of rulemaking to repeal the Clean Power Plan. *See*, States of California, Delaware, Hawaii, Illinois, Maine, Maryland, New Mexico, New York, Oregon, Vermont, and Washington, the Commonwealth of Massachusetts, the District of Columbia, the County of Broward (Florida), and the Cities of Boulder (Colorado), Chicago (Illinois), New York (New York), Philadelphia (Pennsylvania), and South Miami (Florida) Comments on EPA Administrator Scott Pruitt’s Improper Prejudgment of Outcome of Proposed Repeal of Clean Power Plan (Jan. 9, 2018),

https://oag.ca.gov/system/files/attachments/press_releases/Comment%20Letter%20on%20Improper%20Prejudgment%20of%20CPP%20Repeal%201-9-18_0.pdf; Senators Whitehouse, Merkley, Schatz, and Markey Comments on EPA Administrator Scott Pruitt’s improper involvement in Clean Power Plan-related rulemaking (Feb. 6, 2018), <https://www.regulations.gov/document?D=EPA-HQ-OAR-2017-0355-17190>

⁵ <https://www.whitehouse.senate.gov/news/release/whitehouse-slams-pruitts-evasive-responses-to-post-hearing-questions>

While you have chosen to send the public and Congress chasing through state bureaucracy and the courts to learn about your industry ties, it remains your responsibility under federal ethics rules to provide to EPA's designated agency ethics official (DAEO) information that may be relevant to whether or not you should be recused from particular matters. *See* 5 C.F.R. §2635.502(a). By regulation, the DAEO may undertake an independent assessment of the facts, at any time, of your compliance with the rules. The OK AG's determination that thousands of pages of documents are privileged because of litigation makes them immediately relevant to the scope of your recusal. Through this letter, we are putting the DAEO and the Office of Government Ethics on notice of these materials with a request that steps be taken to obtain and review these documents to ensure your full compliance with the Ethics in Government Act as well as the accuracy and completeness of your recusal statement.

Sincerely,



Thomas R. Carper
United States Senator



Sheldon Whitehouse
United States Senator

cc: David J. Apol, Acting Director, U.S. Office of Government Ethics
Kevin Minoli, Designated Agency Ethics Official, U.S. Environmental Protection Agency



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

February 21, 2017

The Honorable Aletia Haynes Timmons
Oklahoma County Courthouse
321 Park Avenue, Room 811
Oklahoma City, Oklahoma 73102

Re: Center for Media and Democracy v. Scott Pruitt,
Oklahoma County Case No. CV-17-223

Dear Judge Timmons:

The attached is an index of the documents this office is not producing to the plaintiff and the reasons for withholding.

**INDEX OF NON-PRODUCED MATERIALS
FOR THE COURT'S IN CAMERA REVIEW ONLY¹**

<u>Description of Documents Withheld or with Redactions</u>	<u>Basis for Redaction, Privilege, or Withholding</u>	<u>Bates Numbers</u>
Emails relating to personnel decisions	A public body may keep the personnel records confidential where disclosure would constitute a clearly unwarranted invasion of personal privacy such as employee evaluations, payroll deductions, employment applications submitted by persons not hired by the public body. 51 O.S. Supp. 2014 § 24A.7(A)(2).	004730-004732, 004749
Emails included in the investigatory files of the Attorney General's Office	The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S. 2011, § 24A.12.	003611-003617, 004331-004333,
Emails included in a litigation file of the Attorney General's Office	The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S. 2011, § 24A.12.	004343-004345

¹ The basis for withholding is due to the email messages and their attachments.

<u>Description of Documents Withheld or with Redactions</u>	<u>Basis for Redaction, Privilege, or Withholding</u>	<u>Bates Numbers</u>
Emails containing claimant information for claims pending with the State Treasurer's Office for Unclaimed Property	Any information submitted by a claimant which is required to be submitted to the State Treasurer to establish a claim may be kept confidential by the State Treasurer if it contains personal financial information of the claimant, social security numbers, birth certificates or similar documents related to the parentage of an individual, or any other document which is confidential by statute if in the custody of another public agency or person. 60 O.S.2011 § 674(A).	003597-003599, 003604-003610, 003620-003628, 003642-003646
Emails regarding personal matters not related to the transaction of public business.	Under the Open Records Act, a "[r]ecord means all documents . . . created by, received by, under the authority of . . . public officials, public bodies, or their representatives <i>in connection with the transaction of public business, the expenditure of public funds or the administering of public property.</i> " 51 O.S.Supp.2014 § 24A.3(1).	000019, 000022-000026, 000075-000085, 001066-001069, 001098-001100, 001165, 001254-001259, 001295-001298, 001301, 001443-001483, 001560-001578, 001593-001634, 002616-002626, 002905-002930, 003949-003950, 004181-004183, 004189-004190, 005784-005790, 005899-005902, 006027-006028, 006797
Emails containing documents, amicus briefs, and legal strategy which are part of the litigation files.	Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a) The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S.2011, § 24A.12.	000406-000434, 000477-000479, 000487-000490, 000501-000511, 000537-000540, 000542-000543, 000567-000633, 001260-001283, 001284-001294, 001299-001300, 001302,

<u>Description of Documents Withheld or with Redactions</u>	<u>Basis for Redaction, Privilege, or Withholding</u>	<u>Bates Numbers</u>
		001337-001354, 001558-001559, 0001579-01592,
Emails containing documents, amicus briefs, and legal strategy which are part of the litigation files.	Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a) The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S.2011, § 24A.12,	002740-002753, 002757-002792, 002794-002847, 002849, 002851-002894, 002897-002904, 002945-002949, 002955-002988, 003128-003198, 003407-003479, 003633-003640, 004283-004286, 005158-005314,
Emails containing documents, amicus briefs, and legal strategy which are part of the litigation files.	Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a) The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S.2011, § 24A.12.	005326-005329, 005346, 005359-005371, 005383-005400, 006754-006796, 006798-006834, 006837-006847, 006851-006854, 006862-006885, 006890-006892, 006899-006911, 006914-006915, 007534-007549, 007552, 007561-007571, 007576-007619, 007623-007668, 007673-007677, 007682-007765, 007768-007831.
Emails containing documents, drafts of proposed rules, pleadings and drafts, legal strategy and data from investigations for case in litigation.	Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a) The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S.2011, § 24A.12	000091-000125, 000128-000132, 000137-000168, 000172-000173, 000176-000177, 000179-000238, 000241-000243,

<u>Description of Documents Withheld or with Redactions</u>	<u>Basis for Redaction, Privilege, or Withholding</u>	<u>Bates Numbers</u>
		000246-000254, 000266-000276, 000279-000284, 000287-000289, 000292-000304, 000307-000308,
Emails containing documents, drafts of proposed rules, pleadings and drafts, legal strategy and data from investigations for case in litigation.	Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a) The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S.2011, § 24A.12	000310, 000313-000318, 000323-000324, 000326-000384, 000387-000392, 000393-000405, 000435-000476, 000480-000486, 000491-000500, 000512-000536, 000541, 000544-000560, 001751-001769,
Emails containing documents, drafts of proposed rules, pleadings and drafts, legal strategy and data from investigations for case in litigation.	Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a) The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S.2011, § 24A.12	001774-001785, 001788-001796, 001804-001834, 001837-001840, 001843-001862, 001866-001868, 001870-001873, 001883, 001886, 001895-001896, 001889, 001922, 003658-003788, 003792-003812, 003821-003842, 003845-003909, 003914-003915, 003919-003948, 003951-003960, 003964-003976, 003979-004011, 004017-004071, 004073-004090, 004092-004099,

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Emails containing documents, drafts of proposed rules, pleadings and drafts, legal strategy and data from investigations for case in litigation.	Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a) The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S.2011, § 24A.12	004102-004124, 004127-004155, 004160-004175, 004198-004199, 004205-004207, 004219, 004226, 004228-004230, 004238,
Emails containing documents, drafts of proposed rules, pleadings and drafts, legal strategy and data from investigations for case in litigation.	Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a) The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S.2011, § 24A.12	004243-004244, 004253, 004260-004270, 004321-004325, 005346, 005359-005371, 005376-005382, 005401-005402, 005404-005421, 005428-005468, 005472-005481, 005483-005495, 005507-005509,
Emails containing documents, drafts of proposed rules, pleadings and drafts, legal strategy and data from investigations for case in litigation.	Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a) The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S.2011, § 24A.12	005511-005513, 005518-005541, 005545-005557, 005561-005585, 005587-005706, 005709-005717, 005719-005726, 005729-005740, 005742-005783, 005795-005817, 005822-005849, 005852-005889, 005893-005898, 005903-005947, 005956-005970, 005984-005989, 005991-005995, 005998-005999, 006007, 006010-006015, 006022-006023,

<u>Description of Documents Withheld or with Redactions</u>	<u>Basis for Redaction, Privilege, or Withholding</u>	<u>Bates Numbers</u>
Emails containing documents, drafts of proposed rules, pleadings and drafts, legal strategy and data from investigations for case in litigation.	Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a) The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S.2011, § 24A.12	006026, 006031-006039, 006047, 006050, 006054-006055, 006058, 006065, 006068-006069, 006948-006949, 006956-006960, 006963-006968, 006971-006986,
Emails containing documents, drafts of proposed rules, pleadings and drafts, legal strategy and data from investigations for case in litigation.	Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a) The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S.2011, § 24A.12	006989, 006993, 006996, 006997-006998, 007001-007006, 007008-007010, 007019-007023, 007026-007032, 007039-007040, 007042-007056, 007058, 007060, 007062-007082,
Emails containing documents, drafts of proposed rules, pleadings and drafts, legal strategy and data from investigations for case in litigation.	Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a) The Attorney General . . . may keep its litigation files and investigatory reports confidential. 51 O.S.2011, § 24A.12	007084-007124, 007128-007206, 007208-007210, 007214, 007217-007222, 007231-007235, 007241-007248, 007266-007276, 007280-007281, 007283-007284

INDEX OF NON-PRODUCED MATERIALS FROM FEBRUARY 10, 2017
PRODUCTION

<u>Date(s)</u>	<u>Description of Documents Withheld or Redacted</u>	<u>Basis for Redaction, Privilege, or Withholding</u>
06/4/2014	Email chain between Patrick Wyrick, John Martin (jmartin@crowell.com), Roger Kelley (roger.kelley.clr.com), Jim Farrell (Jim.Farrell@clr.com), and Andrea Miles (Andrea.miles@dvn.com) discussing conference call to discuss legal strategy in case in litigation.	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
2/14/2014	Email chain from Katie Spohn (Katie.spohn@nebraska.gov), Matthew A. Sagsveen (masagsve@nd.gov), and Robert Tambling (Robert.Tambling@ago.state.nd.us) and all parties to EPA lawsuits containing drafts of amicus brief in <i>State of North Dakota v. EPA</i> , et al. and drafts of Petitions for Writ of Certiorari with Appendix.	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
3/5/2014	Email from Wilson-EPES Printing to Patrick Wyrick containing pleadings in <i>State of Oklahoma, et al. v. EPA, et al.</i> , Case No. 13-921	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
3/20/2014	Email from Wilson-EPES Printing to Peter Glaser (peter.glaser@troutmansanders.com) and Patrick Wyrick, Tom Horne (Tom.horne@azag.gov) containing amicus brief filed in <i>State of Oklahoma, et al. v. U.S. EPA, et al.</i> , Case No. 13-921	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)

5/22/2014	Email between Norman Rave (norman.rave@usdoj.gov) and Patrick Wyrick, Clayton Eubank and all parties in case, <i>Public Service Company of Oklahoma v. EPA</i> , No. 12-1023 regarding motions	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
5/27/2014, 5/28/2014, 5/29/2014	Email between Norman Rave (norman.rave@usdoj.gov) and Patrick Wyrick, Clayton Eubank and all parties in case, including Clayton Eubanks, <i>Utility Air Regulatory Group v. EPA</i> , No. 12-1346 regarding motions	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
10/8/2014	Email between Norman Rave (norman.rave@usdoj.gov) and Patrick Wyrick, Clayton Eubank and all parties in <i>Public Service Company of Oklahoma v. EPA</i> , No. 12-1023 regarding motions	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
8/11/2014, 8/12/2014,	Email between Norman Rave (norman.rave@usdoj.gov) and Patrick Wyrick, Clayton Eubank and all parties in <i>Public Service Company of Oklahoma v. EPA</i> , No. 12-1023 regarding motions	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
11/19/2014, 11/24/2014, 12/1/2014	Email from Norman Rave (norman.rave@usdoj.gov) to Patrick Wyrick, Clayton Eubank and all parties to <i>Wisconsin Public Service Co. v. EPA</i> , No. 12-1163, <i>Public Service Co. of Oklahoma v. EPA</i> , No.12-1023, and <i>UARG v. EPA</i> , No. 12-1346, regarding motions in cases	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)

12/15/2014	Email from Norman Rave (norman.rave@usdoj.gov) to Patrick Wyrick, Clayton Eubank and all parties in Public Service Company of Oklahoma v. EPA, No. 12-1023 regarding motions	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
6/11/2014, 6/12/2014, 6/16/2014	Email chain between Patrick Wyrick, Gary Broadbent (gbroadbent@coalsource.com), Geoffrey Barnes (Geoffrey.barnes@squirepb.com) to discuss conference call about case in litigation	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
7/24/2015	Email chain from Stacy Bankston (sbankston@acp.com) to all parties in PSO 2015 Rate Case regarding Discovery Responses	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
3/10/2014	Email from Mary Hernandez (M.hernandez@occcemail.com) regarding Corporation Commission Cause No. PUD 201300159	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
4/29/2014	Email from Katie Spohn (Katie.spohn@nebraska.gov) containing U.S. Supreme Court Decision in EPA <i>et al.</i> , v. EME Homer City Generation, L.P. <i>et al.</i> No. 12-1182 as well as discussion of legal strategy.	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)

8/1/2014	Email from Rochelle Brooks (r.brooks2@cccemail.com) to parties to Corporation Commission Cause No. PUD 201500273 containing draft of proposed final order	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
8/5/2014	Email from Rochelle Brooks (r.brooks2@cccemail.com) to all parties to Corporation Commission Cause No. PUD 200900030	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
1/9/2015	Email between John Martin (jmartin@crowell.com) and Patrick Wyrick, Clayton Euhanks, <i>et al.</i> regarding strategy for case in litigation	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
1/18/2015, 1/19/2015, 1/21/2015, 1/23/2015	Email chain between Sandra Franco (Sandra.franco@morganlewis.com) and parties to Michigan V. EPA, UARG v. EPA, NMA v. EPA, S. Ct. Nos. 14-46, 14-47, 14-49 concerning discussion of amicus briefs	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)

3/27/2015, 3/30/2015	Email chain between John Martin (Jmartin@erowell.com) and Patrick Wyrick, Clayton Eubank and all parties to amicus briefs concerning drafts	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
11/24/2014	Email from Norman Rave (norman.rave@usdoj.gov) to Patrick Wyrick, Clayton Eubank and all parties to <i>Wisconsin Public Service Co. v. EPA</i> , No. 12-1163, <i>Public Service Co. of Oklahoma v. EPA</i> , No.12-1023, and <i>UARG v. EPA</i> , No. 12-1346, regarding motions in cases	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
1/20/2015	Email from Wilson-EPES Printing to Patrick Wyrick, Clayton Eubank and all parties to <i>Michigan v. EPA</i> , <i>UARG v. EPA</i> , <i>NMA v. EPA</i> , S. Ct. Nos. 14-46, 14-47, 14-49 including the Brief for Petitioner.	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
1/27/2015	Email from Wilson-EPES Printing to Patrick Wyrick, Clayton Eubanks and all parties to <i>Michigan v. EPA</i> , <i>UARG v. EPA</i> , <i>NMA v. EPA</i> , S. Ct. Nos. 14-46, 14-47, 14-49 including the Motion for Leave to File Amici Curiae Brief	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
2/27/2015	Email from John Lazzaretti (John.lazzaretti@squirepb.com) to Patrick Wyrick, <i>et al.</i> , regarding Joint Appendix to be filed in <i>Murray v. EPA</i> , No. 14-1112 & 14-1151	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)

3/18/2015	Email from Wilson-EPES Printing to Patrick Wyrick, <i>et al.</i> , including Reply Brief in <i>State of Michigan, et al., v. EPA</i> , Nos. 14-46, 14-47, 14-49	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
3/27/2015	Email from John Martin (jmartin@erowell.com) to Patrick Wyrick, Clayton Eubanks, and all parties to <i>Aurora Energy Services, LLC, v. Alaska Community Action on Toxics</i> including draft of Petition for a Writ of Certiorari	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a)
7/22/2015	Email from Lee Beck (lebeck365@gmail.com) to Patrick Wyrick, <i>et al.</i> regarding pending WOTUS litigation	Attorney work product protection, Records protected by a state evidentiary privilege such as . . . the work product immunity from discovery. 51 O.S.Supp.2016, § 24A.5(1)(a).
1/8/2015	Email from Michelle Maxey regarding ISIL.	Information relating to Terrorism, 51 O.S.Supp.2016, § 24A.28.
7/9/2014	Email from AJ Ferate containing personal note	A "[r]ecord means all documents . . . created by, received by, under the authority of . . . public officials . . . in connection with the transaction of public business, the expenditure of public funds or the administering of public property." 51 O.S.Supp.2014 § 24A.3(1).