



O'NEIL LAW LLC

Experience | Integrity | Solutions

SHAWN M. O'NEIL
ATTORNEY AT LAW

LICENSED IN OREGON & WASHINGTON
8755 SW CITIZENS DRIVE, SUITE 202
WILSONVILLE, OR 97070

T 503.570.8755 | F 503.570.8757
SMO@SHAWNONEIL.COM | WWW.SHAWNONEIL.COM

September 16, 2015

By Email: douglask@wlwv.k12.or.us
Ms. Kelly Douglas
Administrative Assistant to Superintendent and School Board
West Linn-Wilsonville School District
22210 SW Stafford Road
Tualatin, OR 97062

Re: Public Records Request Concerning Inza R. Wood Middle School, Boones Ferry & Lowrie
Elementary Emergency Procedures

Dear Ms. Douglas:

This is a follow-up to my September 17, 2014 public records request concerning Kinder Morgan's Santa Fe Petroleum Pipeline (The Pipeline) and my voice mail message with Director Tim Woodley.

My son will be attending Boones Ferry Elementary next year, and Inza R. Wood Middle School thereafter. While my letter is formally being made under the Oregon Public Records Law, ORS 192.410 to ORS 192.505, my intention has been and remains as a concerned parent and community member. Consequently, I am open to alternative approaches. However, since Mr. Woodley has not had the opportunity to return my call as of yet, I am requesting the following documents:

- 1) The specific emergency procedures that address a pipeline rupture, earthquake or other cataclysmic event including but not limited to procedures that would warrant evacuation of students and school personnel of the above schools away from the Pipeline including the athletic field and school artery it travels through.
- 2) All documents that identify emergency procedures at these three schools that take into account parent-child reunification locations including those that are situated away from the Pipeline if there was a pipeline rupture, earthquake or other cataclysmic event. The Pipeline travels under the road currently utilized for parents to pick-up/drop off their children at the Inza R. Wood Middle School. It also travels adjacent to the road that operates as a main entrance to both schools.

- 3) All documents including correspondence, notes, calendars, recordings, emails, reflecting all communications including meetings between the School District (including but not limited to these three schools) with Kinder Morgan in the last 10 years concerning the Pipeline, pipeline safety awareness, and emergency procedures to address a pipeline rupture, earthquake or other cataclysmic event. This includes all documents memorializing these communications and meetings.
- 4) All documents including correspondence, notes, calendars, recordings, emails, reflecting all communications including meetings within the School District (including but not limited to these three schools) in the last 10 years concerning the Pipeline, pipeline safety awareness, and emergency procedures to address a pipeline rupture, earthquake or other cataclysmic event. This includes all documents memorializing these communications and meetings.
- 5) All documents including emails falling outside the attorney-client privilege that reflect communications including meetings regarding my original September 17, 2014 Public Records Request and efforts to respond to the requests. This includes communications with third parties either by District personnel or its attorneys. This also includes all documents memorializing these communications and meetings.
- 6) All documents including correspondence, notes, calendars, recordings, emails, reflecting all communications including meetings with the School District (including but not limited to these three schools) with the press/media concerning the Pipeline, pipeline safety awareness, and emergency procedures to address a pipeline rupture, earthquake or other cataclysmic event. This includes all documents memorializing these communications and meetings.

Please note I am not asking for you to produce again any documents you have already provided; only new documents including those created since September 17, 2014. The term District, and or School District in this public record's request includes all Schools, Departments, Divisions, and employees of the West Lynn-Wilsonville School District and its representatives. The term document or any form there of refers to any public document as defined under the Oregon Public Records Law, ORS 192.410 to ORS 192.505.

Fees/Costs/Waiver

If there are any fees/costs for searching or copying these records, please inform me if the cost will exceed \$20. However, I would also request a waiver of all fees in that the disclosure of the requested information is in the public interest and will contribute significantly to the public's understanding of the integrity and safety of the Pipeline, the local, state, and federal response to a pipeline emergency, and the coordination between Kinder Morgan and the relevant public agencies concerning the Pipeline. This is extremely important information for those Oregon

Page 3
September 17, 2015
Ms. Kelly Douglas
Re: Public Records Request

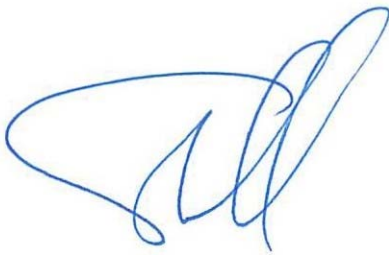
citizens living near or adjacent to the 115 mile path of this Pipeline. In addition it is of specific concern to those who have children attending school adjacent to the Pipeline. This information is not being sought for commercial purposes.

I would request a prompt response to this request. If you expect a significant delay in responding to or in fulfilling this request, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

I would be willing to consider withdrawing some or all of this request if a meeting with the key principal players within the District and the above schools was arranged that is informative, collaborative, and if necessary promotes change. Thank you for your timely response.

Very truly yours,

A handwritten signature in blue ink, appearing to read "S. O'Neil", with a large, sweeping initial "S" and a stylized "O'Neil".

Shawn M. O'Neil