

# **EXHIBIT 67**

*RF file*

**MAXUS**

August 12, 1987

Mr. Michael Schuit  
State of New Jersey  
Department of Environmental Protection  
Office of Regulatory Services  
CN 402  
Trenton, New Jersey 08625

Re: Dioxin Research Supplemental  
Administrative Consent Order  
Concerning the 80 Lister Avenue Site

Dear Mike:

As you requested, I am furnishing you with the following synopsis of the more recent history of changes of name and ownership structure of Diamond Shamrock Chemicals Operations:

1. On September 4, 1986, Diamond Shamrock Corporation (the parent, holding company formed in September 1983) sold all the outstanding stock in Diamond Shamrock Chemicals Company (originally Diamond Alkali Company) to Oxy-Diamond Alkali Corporation, a company under the ownership of Occidental Petroleum Corporation. Diamond Shamrock Chemicals Company was then re-named Occidental Electrochemicals Corporation ("OEC"). OEC is a chemicals company operating several plants with multi millions of dollars in assets and whose products are marketed world-wide. Title to the Newark site which was to remain in the Diamond Shamrock holding company did not pass as part of the stock transaction. Rather, as part of the reorganization, an intra-holding company transfer of title was made from Diamond Shamrock Chemicals Company to Diamond Shamrock Chemical Land Holdings, Inc., which is an indirect subsidiary of Diamond Shamrock Corporation.

Mr. Michael Schuit  
August 12, 1987  
Page 2

2. In April 1987, Diamond Shamrock Corporation changed its name to Maxus Energy Corporation ("Maxus").
3. Under the agreement by which the stock of Diamond Shamrock Chemicals Company was sold, Diamond Shamrock (now Maxus) agreed to administer the consent orders relating to the Newark site. Accordingly, the role of Maxus with respect to the Newark site is to respond to the consent orders on behalf of OEC.

I believe the above information should answer your questions. In any event, as we indicated to you this week, we would appreciate your signing and obtaining the execution of the amended consent order and returning an executed copy to Mr. William Hutton so that we can move forward on the project. In this regard I am enclosing a copy of the executed standby trust agreement.

Sincerely yours,



Edward J. Masek

EJM:lg  
Enclosure

cc Gerard Burke, Director  
Michael Catania, Deputy Commissioner  
William C. Hutton

43791g3