

Bernstein, Shur, Sawyer & Nelson, P.A.

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David P. Littell Shareholder 207-228-7156 dlittell@bernsteinshur.com

VIA EMAIL – laura.paye@maine.gov

February 5, 2025

Laura Paye Hydropower Coordinator Maine Department of Environmental Protection 17 State House Station Augusta, ME 04333

Re: Bucksport Mill, LLC Consultation Related to Abandonment of Three Dams

Dear Ms. Paye:

I write as counsel for the Town of Bucksport (the "Town"). Thank you for copying the Towns on the letter to Bucksport Mill, LLC ("Buckmill") the Department sent out yesterday, February 3, 2025. The Town appreciates the Department stating that, "the Department will consider whether the Petitioner provided reasonably appropriate information during the consultations. This includes providing information to the parties under § 902(3) that would allow these entities to meaningfully assess potential assumption of ownership of the dams at issue." The Town is interested in undertaking a thorough due diligence of the Silver Lake Dam and is also working with the other four directly affected Towns and parties with which Buckmill has a contractual obligation to maintain the Dams. The Town is assessing structures to receive and responsibly managed the Silver Lake dam as a high risk dam and is talking with other affected Towns regarding the other two dams which Buckmill has petitioned for permission to abandon.

Town of Bucksport's Interests

As we have previously stated, the dams that Buckmill seeks permission to abandon are all high-risk dams, the failure of which would pose significant danger to substantial portions of the Town of Bucksport, and, to our understanding, the Town of Orland. The Silver Lake impoundment provides water to the Maine Water Company and therefore to inhabitants and businesses located in the Town of Bucksport. The petition filed by Buckmill threatens the security of the Town's public water supply and threatens the public safety with the risk of, flooding, and the potential loss of water for two of the Town's largest businesses. The Town understands Bucksport Generation, LLC ("Bucksport Generation") cannot operate without cooling water when called to provide electricity to the New England power grid as a reliability generation asset.

The Town of Bucksport has respectfully requested information to assess potential assumption of ownership of the Silver Lake dam. The Town and any subsequent transferee, of course, need to understand the extent of the ownership interests, obligations, and liabilities. Any reasonable transferee would want to understand what it is considering taking on.

Specifically, the Town has asked Buckmill and its corporate owner AIM for information on August 1, 2024. (Attachments A). After I was retained, we narrowed the request: the Town asked Buckmill on November 6, 2024, for 15 categories of information (Attachment B). Counsel for Buckmill/AIM responded without providing substantial information stating that it would only provide more information to municipalities who pass a resolution of interest through their legislative bodies. To meet this Buckmill requirement, the Town of Bucksport passed a resolution and we forwarded that resolution and again reiterated the requests for due diligence information on December 19, 2024 (Attachment C).

The Town of Bucksport Appreciates Buckmill's Answers that it Will, Eventually, Provide Much or Most of the Requested Information.

Buckmill has stated variously via letter and at the public meeting that it will provide much or most of the requested information if the requestors meet the criteria imposed by Buckmill to receive that information. Without agreeing that those conditions and delays are reasonable or allowed under the statute, the Town finds Buckmill's indications it will provide much or most of the information to be positive and encouraging.

That said, timing matters for a municipality's ability to undertake ordinary due diligence. In total, we have made three requests for the needed due diligence information over the last six months.

The Town of Bucksport Requires the Information that Any Transferor Would Reasonably Provide Any Reasonable Transferee for Due Diligence

The Town requires good faith cooperation by the current dam owner as it seeks to abandon these dams. These dams and associated dam equipment are complex. The Town understands there have been a number of evaluations and studies undertaken by Buckmill and its predecessors of the Silver Lake Dam, associated equipment, pump-houses, and water piping used to refill Silver Lake. The Town as a potential transferee needs these engineering reports and evaluations, along with the status of any permits to operate these facilities, provided so the Town can assess the costs and liabilities any transferee would accept. The Town is seeking nothing more than proper due diligence information that any transferee needs to reasonably and responsibly consider such a transfer of ownership.. It is reasonable for Buckmill to be required to provide all of these evaluations, and the other Towns should receive the same information for the dams on Alamoosook and Toddy dams.

Of course, if Buckmill is seeking to abandon these dams, Buckmill has an interest in providing that information and working cooperatively with any transferee but particularly a municipal transferee as specified under the statute.

In short, any transferee reasonably needs to have full access to all records of maintenance, required and deferred capital investments, inspections, and operational issues and other information requested in Attachment B.

The Title for a Dam and its Associated Impoundments and Flowed Lands is Complex and Requires Full and Active Cooperation of the Transferor to Review within the Time Frames of 38 M.R.S. §§ 901 through 909.

A transferee also needs to evaluate the real estate rights relating to any dam, the flowed land(s), and the piping easements used to refill Silver Lake from Alamoosook Lake. The Town has the deeds filed by Buckmill with the Department and the deed analysis provided by counsel to Buckmill arguing that Buckmill has sufficient right, title, and interest to, ironically, seek to abandon those rights. Those deeds do little to explain what liabilities and obligations exist between BuckMill and landowners along the lakes and ponds or what obligations the dam owner has to provide water to specific parties and maintain the dams. We understand there are many such prior real estate easements, deeds, and indentures creating such obligations for the dam owner.

It is clear from the title memo filed by Buckmill that Buckmill has retained title counsel and prepared substantial analysis to show it has current ownership of these assets (sufficient to abandon according to Buckmill's filing). The title analysis provided does not, however, provide analysis on the legal obligations and liabilities that come with the dams and associated properties from 100 years of prior real estate easements, deeds, and indentures.

To be clear on the scope of title review reasonably needed: while the Town has reviewed the deeds filed by Buckmill with its petition, we have also consulted with title counsel on what it would entail to undertake title review to find prior real estate easements, deeds, and indentures. Title counsel advised that conducting a title analysis on these dams and associated real estate to understand the rights and obligations of accepting ownership of a dam and associated flowed properties would take over a year and cost multiple hundreds of thousands of dollars and even then likely would not be complete without significant cooperation of the current owner in providing substantial title, prior real estate easements, deeds, and indentures.

Of course, neither the Town nor the Department have more than a year to run title nor does the Town believe that is a wise use of resources to employ a title attorney and abstractor to develop such title analysis when Buckmill has historic title information and has already engaged title counsel to review it. That is why the Town has requested Buckmill's title files in their entirety, along with those of its predecessor, which we understand are in Buckmill's possession. In short, active cooperation by Buckmill, as the current owner and record holder, is the only reasonable way to undertake responsible due diligence on the timeframes request forth in 38 M.R.S. §§ 901 through 909.

The Town draws the Department's attention to Buckmill's responses in its November 18, 2024, letter responding to the Town's information request, in which it indicates that the title information requested by the Town is in the 'public domain' (Attachment D). Yes, the title registries are public, however as noted, a title review will take more than a year and involve very substantial expenditures whereas Buckmill has this information, and should make it available to any potential transferees, especially those contemplated under the statute.

Transferors in any transaction typically provide a substantial amount of property, real estate, operational, and assets information such as those requested by the Town here. We reasonably expect access to that information to undertake responsible due diligence. A response that title information is public is not responsive nor helpful to getting the information to the municipalities within the time frames envisioned by 38 M.R.S. §§ 901 through 909.

The Town's requests for information are standard commercial expectations necessary for evaluation of costs, liabilities, real estate rights, and obligations of assets such as three dams.

All Affected Towns Have Responded to Buckmill's Request for Formal Legislative Body Resolutions within 60 Days.

As noted, the Town of Bucksport passed the formal resolution requested by AIM on December 12, 2024. The Town also made its third request for information over the last six months on December 19, 2024. To date, the response received by Buckmill in its November 18, 2024, letter merely pointed to 100 years of public documents in the registry of deeds and provided none of the requested information.

In that November 18, 2024 letter, Buckmill said it would institute protocols to keep the information confidential after the requested resolutions were adopted. We have not heard from Buckmill on the information nor any associated protocols to keep the information confidential; we hope to hear from them soon.

The Town of Bucksport is concerned that the confidentiality protocols might inhibit the ability of the impacted municipalities to discuss options to accept the dams and property with other impacted parties such as Bucksport Water Company and Bucksport Generation. We respectfully request such impacted parties be allowed to talk and share due diligence information as those parties ultimately are considering collectively or separately taking on Buckmill's liabilities and the parties will need to be able to talk among themselves.

Further, the Town of Bucksport shares the concerns of the other impacted municipalities that were shared with the DEP on January 31, 2025, regarding Buckmill's intention to seek a non-disclosure agreement. The reason is simple: if there is to be a Town vote, or series of Town votes, to take on these dams then the information on costs, liabilities, and state of the dams and real estate interests will need to be discussed at Town meeting(s). There is no other way for the municipalities to consider a transfer, as set forth as a part of the mandatory consultation process in 38 M.R.S. § 902 (1-A). Municipal ownership of assets and liabilities of this magnitude requires a Town meeting. While it is not clear what information Buckmill wishes to keep confidential and why, the statutory structure suggests municipalities need to have an actual and real opportunity to undertake due diligence and effect municipal ownership.

We will work cooperatively with Buckmill to do so and are hopeful of receiving the requested information soon. We give Buckmill and its owner, AIM, the benefit of the doubt that they may be working on gathering the requested information or organizing the information into a form for the Towns to be able to efficiently conduct due diligence. Perhaps Buckmill is setting up a virtual

data room and question and answer protocol as would be typical for a transaction transferring assets of this size? We hope that information is shared fully and fairly soon given due diligence will likely take six months once the Town(s) receive the requested information.

Time to Allotted to Undertake Adequate Due Diligence is Short and Requires an Extension

Because the amount of information requested is not yet provided, the Town joins the other municipalities in requesting an extension of the Consultation period for an additional 180 days. 38 M.R.S. § 902 (1-A). Even if the information is provided tomorrow, it will be virtually impossible for the Town and other municipalities to conduct a reasonable and responsible due diligence, ask and answer questions and ultimately to vote and reach agreement on whether to accept transfer of the dams prior to April.

We are frankly concerned about having enough time even with a six-month extension, to conduct a proper review and reach a determinations if the information is not provided fully and soon

The Town hopes the Department will encourage the Petitioner, Buckmill, to comply with municipal requirements. The Town respectfully suggests that if the Petitioner goes through the Bucksport dam abandonment process, the information requested should be shared in a local process. That would not only be efficient it would avoid putting the Department in a position of mediating information issues. We hope that Buckmill soon engages in that required municipal process.

Thank you for considering these requests.

Sincerely,

David Littell

cc: Commissioner Melanie Loyzim

Attachments:

- A. The Town of Bucksport's Information Requested, August 1, 2024
- B. The Town of Bucksport's Second Narrower Information Request,
- C. The Town of Bucksport's Notice of Town Resolution and Third Information Request dated December 19, 2024
- D. The Buckmill Response Letter to 2nd Information Request and Request for Town Resolution to Provide Information

ADDITIONAL DATA REQUESTED TO BE REQUIRED FOR INCLUSION IN PETITION FROM AIM/BUCKSPORT MILL, LLC

- Information included in the Purchase and Sale Agreement or closing binder in the acquisition form Verso Corporation of the Silver, Toddy, and Alamoosook Dam, including title searches, title insurance policies and all incorporated covenants and easements.
- Detailed information on deeded water rights and water level requirements associated with each dam and the pipeline
- Any information regarding the composition of the pipeline and it's coating. Has the material been tested for the presence of hazardous materials including but not limited to PCBs or asbestos? If test results exist please provide copies.
- Complete list of Associated Assets (land, Dams) owned by AIM/Bucksport Mill LLC in the watershed.
- Copy of any Emergency Action Plan for each dam
- Copy of MEMA required Operations and Maintenance Plan for each dam along with inspection and maintenance record covering the last 24 months
- Property tax obligations and records for the Dams and Associated Assets owned by AIM/Bucksport Mill LLC
- Details of current & budgeted project and capital improvement plans for 2024 -2027
 - a) Detailed list of forecasted/budgeted preventative maintenance activities for 2024-2027. Vendors, scope of work, etc.
 - b) Estimated timing, costs, and scope of work of any past or proposed construction repairs and/or improvements to the dams. 2018- 2027
- Any insurance documentation and related costs that AIM/Bucksport Mill is currently using to protect breaches, failures, and maintenance costs related to the dams.
- Contracts between AIM/Bucksport Mill and Maine Water, Residents of the watershed, or Bucksport Generation
- Existing as-built construction plans for dams and all appurtenances, including structural plans, site layout plans, contours, adjacent land use, right-of-way maps of properties related to dams, utility maps, and mechanical drawings for gates, pumps, fish ladders, etc.
- Any available engineering reports/information related to the dams or the watershed, including geotechnical borings/soil test data/recommendation reports, topographic survey

data, stream/lake cross sections, and/or bathymetric surveys upstream and downstream of the dams, hydrologic/hydraulic studies/data, and HEC-RAS or similar hydrologic models.

- -Any Environmental reports related to the dams, including impact assessments related to dam removals, configuration, or abandonment
- -All budgets, reports, capital plans, and maintenance and repair costs identified as required to be provided in Exhibit C of the deed recorded on 5/21/2019 in Book 6951 Page 556 of the Hancock County Registry of Deeds from Bucksport Mill, LLC to Whole Oceans from the date of recording until the date of petition submission
- -Itemization of all revenues received from 5/21/2019 to the date of petition submission from Bucksport Generation and Whole Oceans related to the requirements pertinent to the water rights easements contained in Exhibit C of the deed recorded on 5/21/2019 in book 6951 Page 556 of the Hancock County Registry of Deeds from Bucksport Mill, LLC to Whole Oceans

ATTACHMENT B



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David P. Littell Shareholder 207-228-7156 dlittell@bernsteinshur.com

Via Email

November 6, 2024

Katherine Joyce, Esq. Bernstein Shur 100 Middle Street Portland, ME 04104

Re: <u>DEP Petition to Abandon Silver Lake Dam; Consultation and Information Request Pursuant</u> to 38 M.R.S. §§ 901, 902(1)&(3), 908 specifically and 901 through 909 generally.

Dear Attorney Joyce:

I write as counsel for the Town of Bucksport (the "Town"). As you know, the Town is an interested party in your clients' petition to abandon the Silver Lake Dam. The Town requests that the Petitioner(s) consult with the Town municipal officers pursuant to 38 M.R.S. §902(1) and (3). The Town submits this information request pursuant to the consultation provisions of 38 M.R.S. §902(1) and (3).

The Town is examining whether to assume ownership of the Silver lake dam following the process set forth in Title 38 of the Maine Revised Statutes, sections 901 through 909. To make its assessment, the Town reasonably needs to understand the title that defines the rights and obligations of the dam as well as cost of operation, capital investment, and legal obligations whether by deed, easement, or contract to others of the property(ies), rights, obligations, and other personal property and/or assets that the petitioner(s) seek to abandon. Therefore, the Town reasonably requests the following relating to the Silver Lake dam and Silver Lake rights and obligations of the petitioner(s):

- 1. Copies of any deeds, and all incorporated covenants and easements, related to the dam and land under the dam, title to any equipment or personal property normally located at the dam site, and flowage rights and access rights related to Silver Lake and the Silver Lake dam. 38 M.R.S. §906(2)
 - a. Please provide prior title searches, title insurance policies.

- b. Likewise, for the Silver Lake Dam and Silver Lake, please provide any deeded water rights, private agreements, and, if any, water level obligations in private agreements associated the dam and the water intakes on Silver Lake, pipelines to and from Silver Lake, and pump stations serving customers of Silver Lake water or serving Silver Lake.
- c. An inventory and complete list of associated assets associated with the Silver Lake dam and water management system owned by Bucksport Mill LLC or any AIM entity in the watershed that pertain to Silver Lake.
- 2. For the Silver Lake water system(s), please provide any information regarding the composition of the pipeline and its coating. Has the material been tested for the presence of hazardous materials including but not limited to PCBs or asbestos? If test results exist, please provide copies.
- 3. For the Silver Lake dam, please provide the Emergency Action Plan for the Silver Lake dam and any related facilities.
- 4. For the Silver Lake dam and water intakes, piping, and pumps stations owned by the petitioner(s), please provide the current & budgeted project and capital improvement plans for 2024 -2027 and any deferred capital items identified in the prior 10 years.
- 5. For the Silver Lake dam, please provide a detailed list of forecasted/budgeted preventative maintenance activities for 2024- 2027 including vendor information, and scope of work, and any deferred maintenance.
- 6. For the Silver Lake dam, please provide the timing, costs, and scope of work of past or proposed construction repairs and/or improvements to the dams from 2018- 2024. Please provide the same information for water intakes, piping, and pumps stations owned by the petitioner(s) discharging to or taking water from Silver Lake.
- 7. For the Silver Lake dam, please provide the insurance policies and documentation and related costs that any AIM entity or Bucksport Mill is currently using to address risks management of failures, and maintenance costs related to the dams.
- 8. For Silver Lake, please provide any contracts between any AIM entity or Bucksport Mill LLC and Maine Water, Bucksport Generation, or other receiving water or services from Silver Lake or the Silver Lake Dam.
- 9. Please provide, any and all existing plans, site plans, or as-built construction plans for Silver Lake dams and related pipelines, water intakes, and pump stations serving Silver Lake, or fish ladders relating to Silver Lake.
- 10. Any available engineering reports, evaluations and reports related to the Silver Lake dams or water intake, pipelines, pump structures, and or fish ladders.

- a. Please also specifically stream/lake cross sections, and/or bathymetric surveys upstream and downstream of the dams, hydrologic/hydraulic studies/data, and HEC-RAS or similar hydrologic models.
- b. This request includes any environmental reports related to the dams, including assessments of dam reconfiguration, removals, or abandonment.
- 11. For Silver Lake and the Silver Lake dam, any geotechnical borings/soil test data/recommendation reports, or topographic survey.
- 12. An accounting, or itemization of all revenues received from 5/21/2019 to the date of petition submission from Bucksport Generation and Whole Oceans related to the requirements pertinent to the water rights easements contained in Exhibit C of the deed recorded on 5/21/2019 in book 6951 Page 556 of the Hancock County Registry of Deeds from Bucksport Mill, LLC to Whole Oceans.
- 13. All budgets, reports, capital plans, and maintenance and repair costs identified as required in Exhibit C of the deed recorded on 5/21/2019 in Book 6951 Page 556 of the Hancock County Registry of Deeds from Bucksport Mill, LLC to Whole Oceans from the date of recording until the date of petition submission.
- 14. Copies of all federal, state, and/or local permits and approvals related to the operation of the Silver Lake dam or Silver Lake, no matter whether still in force or how old.
- 15. Copies of any notice of violation or description of any enforcement actions taken by any federal, state, or local agencies related to the operation of the Silver Lake dam or Silver Lake, no matter whether still in force or how old.

The Town requests that the Petitioner please provide this information as expeditiously as possible and no later than November 18, 2024 so the Town can evaluate the information and have follow up requests and consultation with the petitioner(s) within the 60 days provided for in 38 M.R.S. 8908.

Best regards,

David Littell

cc: Laura Paye, Maine DEP Dams Program Coordinator Susan Lessard, Bucksport Town Manager

ATTACHMENT C



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Via Email – kjoyce@bernsteinshur.com

December 19, 2024

Katherine Joyce, Esq. Bernstein Shur 100 Middle Street Portland, ME 04104

Re: Town of Bucksport Resolution 2025-28 re Silver Lake Dam Ownership

Dear Attorney Joyce:

I write as counsel for the Town of Bucksport. The Town understands that Bucksport Mill, LLC and AIM are aware the Town's legislative body, the Town Council passed a formal resolution on December 12, 2024 to express interest in discussions with your client(s) to transfer some or all of the dam facility(ies) on and related to Silver Lake in the Town of Bucksport.

For your records, the resolution is attached.

This resolution, as described therein, is an expression of interest consistent with what your clients request in your letter response to the Town of November 18, 2024.

The Town reiterates its information request in its letter to your clients of November 6, which information is necessary to undertake due diligence regarding the dam facility(ies) on and related to Silver Lake in the Town of Bucksport.

The Town looks forward to receiving the information and working with your clients and other parties on a resolution of the dam abandonment petition.

Best regards,

David Littell

Attachment

cc: Laura Paye, Maine DEP Dams Program Coordinator (with attachment) Susan Lessard, Bucksport Town Manager (with attachment)

RESOLVE 2025-28 TO CONTINUE EXPLORING OWNERSHIP OF SILVER LAKE DAM

The Town of Bucksport, through its municipal legislative body, the Town Council of the Town of Bucksport, expresses interest in entering into discussions with Bucksport Mill, LLC, and various AIM entities as necessary and advisable, to transfer some or all of the dam facility(ies) on and related to Silver Lake in the Town of Bucksport.

On November 6, 2024, the Town's outside counsel wrote to the attorney for Bucksport Mill, LLC and AIM requesting information for the Town to undertake due diligence of the facility(ies) and properties relating to the Silver Lake dam.

On November 18, 2024, counsel for Bucksport Mill, LLC and AIM responded via letter stating that the current dam owner(s) are encouraged that the Town of Bucksport is interested in a 'more full-scale due diligence.' The November 18, 2024 Bucksport Mill LLC response through counsel further states that it believes some of the requested information is available in the DEP filing or in the public domain for requests 1 through 3 and 14. Regarding the other information requested for due, specifically requests 4 through 13 and presumably 15, Bucksport Mill LLC through counsel indicated that it will require an expression of interest from each Town municipal legislative body to provide additional information requested by the Town.

As requested in the November 18, 2024 letter from Bucksport Mill, LLC's, this resolution is an expression of interest so that the Town can work with other interested Towns, the Maine Water Company, and Bucksport Generation, LLC to consider facilities and property(ies) separately and together for possible transfer.

Acted on December 12, 2024

Yes 7 No 0 Abstained ___

Attested by: George Dakin, Deputy Town Clerk

ATTACHMENT D



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Katherine Joyce 207-228-7297 kjoyce@bernsteinshur.com

VIA EMAIL

November 18, 2024

David Littell, Esq. Bernstein Shur 100 Middle Street Portland, ME 04104

Re: DEP Petition regarding Silver Lake Dam

Dear David:

This letter is in response to your November 6 letter requesting information from Bucksport Mill, LLC ("Bucksport Mill"). In the spirit of cooperation, Bucksport Mill is responding on the requested date of November 18.

Bucksport Mill understands that both you and representatives of the Town attended and spoke at the public meeting held by Bucksport Mill on November 14. This public meeting also established a follow-on protocol for posting questions and answers online by November 24 to ensure that all parties to consultation have access to the answers provided in writing. While this public meeting and the follow-on process to share information is the consultation process described in 38 M.R.S. § 902(1) and (3), Bucksport Mill is encouraged to hear that the Town of Bucksport may have interest in pursuing more full-scale diligence on the Silver Lake Dam.

Your letter appears to read into the statute a requirement that a comprehensive consultation with the Town be completed within 60 days under 38 M.R.S. § 908. However, where Section 908 does not reference consultation, and the consultation requirement elsewhere described in the statute (Section 902) is a minimum of 180 days, Bucksport Mill's process expectations are that the Town legislative body will use its public meeting to determine whether or not to pursue diligence towards a possible change in ownership.

Bucksport Mill's proposed protocol for diligence on the Silver Lake Dam is set forth below, as well as reference to various resources to access information that has already been made available through the Petition or is otherwise publicly available. Please note that the answers to questions posed at the public meeting will be posted online by November 24, as expressed at the November 14 public meeting.

Proposed protocol for diligence

As with any transaction, the two hallmarks of diligence are a formal expression of interest, and an enforceable agreement regarding the confidentiality of certain information. Therefore, to proceed with the level of diligence contemplated in your letter, Bucksport Mill will require evidence that the municipal legislative body has considered the issue of dam ownership at a public meeting as required in 38 M.R.S. § 908, and that the outcome of that meeting is a decision to engage in good faith diligence to fully evaluate the potential of owning the Silver Lake Dam. It is Bucksport Mill's expectation that such an initial determination be made on the basis of the Petition and available information, rather than as a final determination based on completed diligence.

Once evidence of this initial determination is received, Bucksport Mill would expect to discuss effective mechanisms by which to keep appropriate information confidential when the counterparty to diligence is a municipal entity. Once such mechanisms are in place, Bucksport Mill will provide available information for review and consideration.

<u>Initial responses to November 6 requests</u>

- 1. Title information: please note that, in addition to being public information, this was also provided as a supplemental filing to the Petition, in addition to a detailed title memorandum. Assuming that the Town is designated as an interested entity with DEP, that information should already have been provided to you, or will be shortly on the website provided by DEP. Bucksport Mill will address requests for title insurance and asset inventories in the context of good faith diligence and to the extent appropriate in the context of negotiation.
- 2. Composition of pipe and coating: Currently unknown.
- 3. Emergency Action Plan: Bucksport Mill believes that the Town of Bucksport was a participant in the EAP process and should already have this. Please advise if the Town of Bucksport does not already have this in its possession.
- 4-13. Detailed engineering and financial documentation: A fair amount of engineering and inspection information was shared in the Petition. Bucksport Mill will consider requests for additional information in the context of diligence authorized by the municipal legislative body.
- 14. All permits and enforcement information are a matter of public record.

We look forward to the potential of working with you and the Town to explore best options for the disposition of the Silver Lake Dam.

Sincerely,

Katherine Joyce

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