

EXHIBIT A

I. SPECIFICATIONS

1. Any and all data provided to the EPA or its staff by Unocal in connection with RFG or the EPA Phase 2 regulatory process, such data to be in the form provided by Unocal and to indicate the date of receipt of the data.
2. All documents or things reflecting or relating to information provided to the EPA or its staff by Unocal from 1990 to present relating to RFG or the EPA RFG regulations.
3. All documents reflecting or relating to the EPA or its staff's evaluation of any patent, including Unocal patents, in connection with EPA regulations, at any time.
4. All documents reflecting or relating to communications from, with or to any oil company or its representative or attorney relating to the Unocal Patents from 1990 to present.
5. All documents reflecting or relating to communications from, with or to the Federal Trade Commission or its staff with respect to Unocal and/or EPA's rule-making for fuel regulations.
6. All documents reflecting or relating to any analysis performed by EPA or its staff of any information, data or research provided by Unocal in connection with RFG or EPA RFG regulations.
7. All documents reflecting or relating to communications within the EPA and/or among its staff with respect to Unocal from 1990 to present in connection with automobile emissions, reformulated gasoline, RFG regulations or the Unocal Patents.
8. Documents sufficient to show the identity of individuals, companies, organizations or associations with whom EPA staff and/or individual EPA members held private meetings prior to and/or as part of the rule-making for EPA Phase 2 RFG regulations.
9. Documents reflecting or relating to the date and content of private meetings held prior to and/or as part of rule-making for EPA Phase 2 RFG regulations.
10. Documents reflecting or relating to the manner in which the EPA staff determined to propose EPA Phase 2 RFG regulations, including the identity of individuals vested with the power to propose such regulations and the basis for their individual decisions to propose the regulations in the manner proposed.

11. Documents reflecting or relating to the manner in which EPA determined to pass the EPA Phase 2 RFG regulations including how each Board member voted and the basis for each board member's vote.
12. Documents referring or relating to the CARB Phase 2 RFG regulations or the Predictive Model that corresponds to such regulations.
13. Documents from 1990 to the present referring or relating to both (1) the air quality in the State of California; and either (2) (a) RFG; (b) gasoline fuel; or (c) auto emissions.
14. Documents referring or relating to the cost of any proposed EPA Phase 2 RFG regulations.
15. Documents referring or relating to the effectiveness of any proposed or actual EPA or CARB Phase 2 RFG Regulations.

II. DEFINITIONS AND INSTRUCTIONS

1. "Document" means the complete original or a true, correct and complete copy and any non-identical copies of any written or graphic matter, no matter how produced, recorded, stored or reproduced, including, but not limited to, any writing, letter, envelope, telegram, meeting minute, memorandum, statement, affidavit, declaration, book, record, survey, map, study, handwritten note, working paper, chart, index tabulation, graph, tape, data sheet, data processing card, printout, microfilm, index, computer readable media or other electronically stored data, appointment book, diary, diary entry, calendar, desk pad, telephone message slip, note of interview or communication or any other data compilation in your possession, custody or control, including all drafts or all such documents. "Document" also includes every writing, drawing, graph, chart, photograph, phono record, tape and other data compilations from which information can be obtained, translated, if necessary, by the EPA through detection devices into reasonably usable form, and includes all drafts and all copies of every such writing or record that contain any commentary, notes, or marking whatsoever not appearing on the original.

2. "You," for purposes of this request, means the EPA or any of its present or former employees, agents, attorneys, consultants, and all other persons acting or purporting to act on its behalf.
3. "EPA" means the United States Environmental Protection Agency and any bureau, division, office, or subpart thereof.
4. "CARB" means the California Air Resources Board and any bureau, division, office, or subpart thereof.
5. "Unocal," for the purposes of this request, means the Union Oil Company of California, Unocal Corporation and any subsidiary or division thereof.
6. "Unocal Matter" means the investigation conducted by the FTC under Rule No. 011-0214 and this Administrative Proceeding, Docket No. 9305.
7. "Investigation" means any FTC investigation, whether formal or informal, public or non-public.
8. "Third Party" means any person; corporate entity; partnership; association; joint venture; state, federal or local governmental agency, authority or official; research or trade association; or any other entity other than (a) the EPA or (b) Union Oil Company of California or any of its subsidiaries.
9. "Relating to" means in whole or in part constituting, containing, concerning, discussing, describing, analyzing, identifying or stating.
10. "Refiner" means any company in the business of refining oil or gasoline, as well as its parents and subsidiaries.
11. "RFG" means reformulated gasoline including, but not limited to: (a) EPA Phase 2 Reformulated Gasoline; (b) all other Phase 2 RFG, including California Air Resources Board ("CARB") Phase 2 RFG; and (c) reformulated gasoline that complies with any EPA or CARB

regulations. This term also encompasses all technologies and technical features related to any RFG that complies with EPA or CARB regulations.

12. The use of the singular shall be deemed to include the plural and vice versa. The terms "and" and "or" shall be interpreted liberally as conjunctive, disjunctive, or both, depending on the context, so as to have their broadest meaning. Whenever necessary to bring within the scope of a request all the documents that might otherwise be construed to be outside its scope, the use of a verb in any tense shall be construed as the use of the verb in all other tenses. The term "all" includes any and vice versa.

13. All documents that respond, in whole or in part, to any portion of any document request shall be produced in their entirety, including all attachments, enclosures, cover memoranda and post-it notes.

14. If any privilege is claimed as a ground for not producing any document, provide for each such document withheld on the basis of privilege all information required by FTC Rules of Practice § 3.38A.

15. In the event that any responsive document was, but is no longer in your possession, state what disposition was made of it, when, and the reason for such disposition. In the event that a responsive document has been destroyed or returned to a Third Party, state (i) the reason for such document's destruction or return, the date on which the document was destroyed or returned, and the Third Party to whom the document was returned or on whose behalf the document was destroyed; (ii) the name, title, and Division thereof within EPA of the individual in whose possession, custody or control the document was when it was destroyed or returned; and (iii) the name, title, and Division thereof within EPA of the individual who destroyed or returned the document.

16. These document requests are continuing in nature, up to and during the course of the adjudicative hearing. All documents sought by these requests that you obtain or locate after you serve your responses must be immediately produced to counsel for Unocal by supplementary response.