## Exhibit 7

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK -000-

In re: Methyl Tertiary Butyl

Ether ("MTBE") Products
Liability Litigation

Master File No. 1:00-1898

This Document Relates To:

Case No.

City of Fresno v. Chevron U.S.A. Inc., et al., Case No. 04 Civ. 4973 MDL 1358(SAS)

DEPOSITION OF GLEN R. BLUE

March 17, 2011 at 1:00 (1:17) p.m.

Before: ERIC L. JOHNSON

RPR, CSR #9771

Taken at:

Fresno, California

- 1 A. Pardon?
- Q. We will try to use Exhibit 2 as we go through
- 3 questions.
- 4 A. Okay.
- 5 Q. How long were you associated with the station
- 6 at 2809 South Chestnut?
- 7 MS. KLEAVER: Vague.
- 8 THE WITNESS: I don't know the exact dates.
- 9 Several years. I owned the station.
- 10 MR. STEEVES: Q. You owned --
- 11 A. 280 -- well, 49 -- forget 2809. I have no
- 12 interest in it.
- 13 MR. STEEVES: Excuse me. You what?
- 14 A. I was thinking -- it is 4090 South Chestnut.
- Q. Right. I'd like to -- I'd like to first talk
- 16 about 2809 South Chestnut.
- 17 A. All right.
- 18 Q. Do you recall when you started working at Red
- 19 Triangle Oil Company in 2809?
- A. What year?
- 21 O. Yes.
- 22 A. At this location?
- 23 Q. Yes.
- A. In the early '60s.
- Q. What was your job title when you first started

- 1 working there?
- 2 A. I was a janitor, sales, warehouseman, whatever
- 3 had to be done. We didn't wear hats back in those days.
- 4 Q. And how long did you work there?
- 5 A. Well, I have to calculate. You told me a
- 6 little while ago; 30-plus years?
- 7 O. So you worked there during the time period you
- 8 were associated with your father-in-law's business?
- 9 A. Yes.
- 10 Q. So that would have been, I think you testified,
- 11 through 1989?
- 12 A. Yes.
- Q. Did your job duties ever change over time?
- 14 Were you just a jack-of-all-trades, or did you have a
- 15 specific title at any point?
- 16 A. I worked there and did what had to be done.
- 17 Q. Do you recall who the operator of that station
- 18 was at the time you were working there?
- 19 A. That was a company-operated store -- or
- 20 station. Red Triangle operated it.
- 21 O. Okay. Do you recall who owned the property,
- 22 the actual dirt that the -- the station was on?
- 23 A. Arnold Hohenshelt.
- Q. Did Arnold own the tanks as well, the --
- 25 A. He owned the complete facility.

- 1 period you worked there?
- 2 A. Run that by me again.
- 3 MS. KLEAVER: Same objection.
- 4 MR. STEEVES: Q. Do you recall if Red Oil
- 5 (sic) had an agreement to buy a certain brand of
- 6 gasoline during the time period you worked there?
- 7 MS. KLEAVER: Same objection.
- 8 THE WITNESS: I can't tell you who had the
- 9 contracts, but no doubt they did. They committed to buy
- 10 a certain amount of gas.
- MR. STEEVES: Q. But you can't recall the --
- 12 the company?
- MR. PARSEGHIAN: Objection; asked and answered.
- 14 THE WITNESS: The company bought from various
- 15 people over a period -- I don't know what time frame you
- 16 are looking at.
- 17 MR. STEEVES: O. Let's start with the time
- 18 period in the 1980s.
- 19 A. The biggest supplier is Exxon. That was the
- 20 brand. Then they had various rebrand gas.
- 21 O. You said that was the biggest supplier. Were
- 22 there other suppliers?
- 23 A. Did the company buy from other people or people
- 24 delivered in?
- Q. Did the company buy from other people?

- 1 A. Yes.
- Q. Do you recall who that was?
- 3 A. Well, we bought from Jack Griggs Oil.
- 4 Q. Sorry, Jack Riggs?
- 5 A. Griggs, G-r-i-g-g-s.
- 6 Q. Griggs. And do you recall the approximate time
- 7 period that the company was buying from --
- 8 A. I don't remember. I know we had Jim Harness.
- 9 John Harness Oil Company was a supplier of Exxon
- 10 products. And we -- we bought from -- I can't recall
- 11 everyone we bought from. Whoever had the lowest price
- 12 we went and bought from, called rebrand.
- Q. Are you aware of anyone else associated with
- 14 the station that would have personal knowledge of these
- 15 supply agreements?
- MS. KLEAVER: Vague as to time.
- 17 THE WITNESS: I don't know who they would be.
- 18 MR. STEEVES: I am going to show you a few more
- 19 documents associated with this site at 2809. Then we
- 20 will move on to the next site.
- 21 (Deposition Exhibit 4 marked for
- 22 identification)
- MR. STEEVES: Q. Handing you what's been
- 24 marked as Exhibit 4. It is a Business Plan Registration
- 25 form for Red Triangle Oil Company dated January 31st,