## To "leave the land in a condition equal to or better than we found it:" Activism and the Greening of Big Energy

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**ABSTRACT:** Energy producers have engaged in systematic efforts to "green" their corporate images, a phenomenon that is directly related to the rise of modern environmentalism after World War Two. From Peabody Coal's attempts to mitigate the effects of stripmining during the 1950s, to British Petroleum's social media campaign to apprise the public of its efforts to restore the Gulf of Mexico in the wake of the catastrophic 2010 oil spill, energy producers have played an important role in the evolution of environmental activism. This article identifies key events that have framed the structure in which current environmental debates take place, analyzes why energy producers appear to be over-represented in these epic struggles, and postulates some possible motives for that phenomenon.

American environmental activism has been largely shaped by moments of iconic conflict that have served to rouse the public out of apathy and into supporting various environmental causes. These conflicts have taken place in the halls of Congress, at the judicial bar across the United States and in the court of public opinion. Each episode in turn set a precedent for future battles, and many of these epic struggles involved energy producers. The purpose of this article is to raise questions about the role energy producers have played in the evolution of environmental activism and to identify some key pivot points that framed the structure in which current debates take place. This article will also analyze why energy producers appear to be over-represented in these epic struggles, explore the impact they have had upon Big Energy's recent campaigns to "green its image," and identify some possible motives for that phenomenon.

One of the most important early American environmental disputes was the battle over the construction of a dam in Hetch Hetchy Valley in Yosemite National Park. This dispute set the stage for future debates, pitting corporate America and various levels of government in favor of urban development against a mostly grassroots resistance consisting of angry citizens and environmental organizations led by the Sierra Club and its passionate founder John Muir. The key issue in this controversy was whether development should take precedence over the preservation of scenery in national parks. It is well known that San Francisco got its dam and a fresh water supply at the expense of the Hetch Hetchy Valley, a mirror image

of Yosemite Valley. What is not as well known is that the Raker Act, passed in 1913, also forced San Francisco to purchase public power from turbines that were to be included at the O'Shaughnessy Dam where power generation began in the early 1920s.

Several precedents that resurfaced in subsequent debates were established during this conflict. Environmentalists engaged in letter writing campaigns and other grassroots efforts seeking to influence the political process—something to which they did not have a great deal of access. Proponents of the dam attempted to convince the public that they sought to democratize natural wonders and portrayed environmentalists as selfish elites, a strategy that was quite successful in the past and that is still used today. Each side advanced different sets of values. The pro-development coalition argued that the highest and best use of land was when it could be made to produce the most in economic terms. Preservationists advocated that there were some places that should be protected because they were most valuable when left alone. Finally, the Hetch Hetchy debate took place over the construction of a dam that would produce electricity in addition to storing water.2 Thus, from the earliest debates of the 20th century, energy producers and the prodevelopment forces that supported them, helped to erect the framework within which subsequent environmental debates would take place.

That the potential for energy production would constitute a continuing source of debate after the Hetch Hetchy controversy is evidenced by the lengths to which

politicians went to reserve hydroelectric sites for future development both inside and outside the national park system. Although the National Park Act of 1916 prohibited water and power development in the parks, Congress passed the Grand Canyon National Park Establishment Act in 1919 that included a special provision granting the Secretary of the Interior the power to authorize reclamation projects in the park at his or her discretion.

Throughout the 1920s and 1930s, no major environmental debates involving hydroelectric projects in national parks took place. However, energy companies and governmental agencies conducted surveys of most of the west's major rivers during this time. Hoover and the great dams of the Columbia River soon followed, yet despite some interstate squabbles over these projects, (one leading to an official war declaration by Arizona on California), little organized environmentalist opposition materialized. It would only be after the Second World War ended that environmental attitudes would change enough so that the pro-development precedent set at Hetch Hetchy could be challenged. Environmental organizations and their leaders underwent a metamorphosis. The Sierra Club, whose board of directors included David Brower, voted unanimously to endorse the construction of the enormous Bridge Canyon hydroelectric dam in Grand Canyon, thereby approving the flooding of up to 30 miles of Grand Canyon National Park (Sierra Club, Minutes, 1949).

By the early 1950s, Brower and the Sierra Club had reversed their position on Grand Canyon, and they were also attacking dams proposed for Dinosaur National Monument. Although the framework of environmental discourse evolved during this dispute, it retained much of its original configuration. Environmentalists used emotional arguments and contended that the canyons of the Green River were so beautiful that they defied mere quantification. As they had during the Hetch Hetchy debate, supporters of development attempted to paint the environmentalists as selfish people who wanted to reserve these canyons to themselves. But environmentalists countered successfully by demonstrating that most people could enjoy white water rafting and other outdoor activities safely and inexpensively. Environmentalists also had become more politically savvy, and during congressional hearings they attacked the project at its foundation by demonstrating that the Bureau of Reclamation had used erroneous figures to justify it. Using films, photos, and coffee table books, the environmentalists's public relations campaign generated tens of thousands of letters and eventually they used this victory in the court of public opinion to influence the political

process. Preservationists prevailed and Dinosaur National Monument remained free of dams (Harvey, 1999). As a result the Hetch Hetchy precedent was weakened but not entirely overturned, as subsequent conflicts over Glen Canyon and Navajo Bridge National Monument would show. Although the hydroelectric companies did not attempt to green their image during this controversy, they appealed to mainstream public opinion at the time. It remained to be seen how they would react once environmentalism became a mainstream issue with mass appeal.

However, at least one energy company did understand the potential windfall a "green" public image could create. As the environmental movement gained public support, in 1954 Peabody Coal Company started "Operation Green Earth" to plant trees and reintroduce fish and wildlife onto mined lands (Peabody Energy, n.d.a). Begun during the height of the Dinosaur controversy, Peabody's environmental initiative anticipated campaigns many energy producers would undertake during the next decade. But this public relations offensive was also intended to demonstrate that Peabody, a coal producer that competed directly with hydroelectric producers, held a corporate environmental consciousness that was far "greener" than that possessed by companies that were, even at that moment, attempting to desecrate the national park system with hydroelectric dams. Peabody executives recognized that a green corporate image could not only be used to generate public support, it also gave them a marketing tool to use against competing energy sources.

Developing a green corporate image came of age during the 1960s along with the environmental movement. In 1962 Rachel Carson published Silent Spring, opening a new front in the environmental wars by showing the public that environmentalism did not just involve the protection of scenery, it also concerned health issues related to the use of pesticides. Even as Carson's book helped to raise public awareness, the next great battle over preservation versus energy development was already in its initial stages. In 1963, Arizona politicians sought the construction of two enormous hydroelectric dams in the Grand Canyon as part of the Central Arizona Project. Although neither dam was to be located in the national park, environmentalists argued that they would harm it by reducing the flow of the Colorado River and creating an invasive slack-water lake. As it had during the Dinosaur controversy a decade previously, the Sierra Club launched a tremendous public relations campaign that resulted in angry citizens sending hundreds of thousands of letters to Congress. The pro-development coalition of energy producers and government bureaus was stunned by the size of this onslaught. The dispute reached its zenith at a time when the American public was aroused over free speech, the Vietnam War, and the Civil Rights movement. Thus, environmentalism became a mainstream issue. By 1968, with letters pouring into congressional offices and fragile political coalitions in chaos, Congress passed a Central Arizona Project without the controversial Grand Canyon Dams, and environmentalists claimed a great victory that helped foster the passage of the National Environmental Policy Act in late 1969.<sup>3</sup>

During the Grand Canyon Dam fight, energy producers continued their attempts to green their public image. Figuring most prominently were companies that trumpeted alternative energy sources. Atomic energy producers and coal companies led the way, each of which constituted an alternative to hydropower. Atomic energy was touted as a safe alternative to hydropower since the beginning of the controversy by environmentalists and, according to David Brower (personal communication, July 27, 1997), by the Bechtel Corporation—one of the leading builders of nuclear power plants—who poured money into the Sierra Club's anti-dam campaign. Meanwhile in Congress, John Saylor, who represented a leading Pennsylvania coal mining district, constituted the most tenacious opponent of the Grand Canyon dams (F. Dominy, personal communication, November 1, 1996). Peabody Coal eventually reaped the rewards of this debate, by contracting with the Navajo Nation to mine the coal to fuel the power plants adopted in place of the controversial dams.

By the early 1970s the framework within which these environmental disputes occurred was in a period of transition with the passage of the National Environmental Policy Act, the creation of the Environmental Protection Agency, and a growing cadre of experienced environmental lawyers pressing for environmentally favorable resolutions in the court system. During the next three decades, American energy producers suffered terrible publicity as the result of a series of environmental disasters including the Santa Barbara Oil Spill of January to February 1969, the Three Mile Island episode of 1979, the Bhopal chemical leak in 1984, and the Exxon Valdez spill of 1987. Each of these episodes, and others like them received extensive media coverage. After viewing countless pictures of oil soaked birds, people fleeing from towns in Pennsylvania and India, and once-pristine Alaskan beaches now oozing with oil, the public was rapidly coming to associate big energy with environmental destruction

It is not a coincidence, therefore, that energy producers have launched an all-out offensive during the

past three decades to combat these negative images and convince the American people that they are, in fact, environmentally friendly. This new public relations campaign is less focused upon promoting one energy source over another—with a few notable exceptions as we will see—and instead seeks to improve public perceptions of energy producers as an industry. Currently the public is literally bombarded with TV and print media ads and articles touting the environmental consciousness of energy producers. A typical example is the recent British Petroleum campaign. BP's President stated in mid 1998, "That is why we start from a simple principle. Wherever we operate, our ultimate objective is to cause no harm to the environment" (Browne, 1998). That this objective is sometimes difficult to attain is evidenced by the 2010 disaster in the Gulf of Mexico, an event that briefly depressed BP's ability to pay dividends to its stockholders. However, BP's massive cleanup efforts have also provided new opportunities for the company to promote its environmental responsibility as is evidenced by the following quote from BP's Gulf Coast response website: "BP remains committed to remedying the harm that the spill caused to the Gulf of Mexico, the Gulf Coast environment, and to the livelihoods of the people across the region" (BP, n.d.).

Other attempts to massage public attitudes are not quite as obvious. Every parent whose children have watched Crocodile Hunter and other "nature" programs knows there are 23 different species of crocodiles on this planet, that the Smithsonian Institute has identified 260,000 different species of insects in Gabon alone, and that the Guadalupe Islands are the "sharkiest" place on Earth. Another, less obvious fact one can discern from the end credits and during commercial breaks is that many of these environmentally-focused programs are funded through foundations set up by energy producers. If one watches and listens carefully, one can hear an almost endless recitation of foundations, grants, and partnerships between Big Energy and scientific institutions engaged in studies designed to measure everything from ozone depletion to the local impact of oil and gas exploration on African Dwarf Crocodiles. Children, who just happen to be tomorrow's registered voters, are a primary target of this campaign.

The Internet has also become a front in Big Energy's attempt to project an environmentally friendly image. A quick look at leading energy company websites reveals that, from the industry's perspective, putting forth a corporate environmental ethic or consciousness is almost as important as research and development and annual

dividend reports. For example, the website for Chevron Corporation includes a "Global Issues" link that leads one to an "Environment" web page that features blurbs entitled "Protecting the Environment," "Caring for the Environment," and "Respecting Biodiversity" (Chevron Corporation, n.d.).

Likewise, the British Petroleum website features corporate logos juxtaposed upon natural scenes and a link entitled "environment and society" featuring BP's commitment to reduce Global Warming (BP, n.d.a). The website for Peabody Energy, the world's largest privately held coal company, and perhaps the most vilified western energy company as a result of its strip mining of the Black Mesa region features an "Environmental Stewardship" section that trumpets Peabody's "Operation Green Earth," a program that "implements good neighbor practices to ensure that we respond to our neighbors' needs and operate in harmony with local communities. Each year, Peabody's land restoration efforts are recognized with a number of state, regional, national and international honors, including more than 25 major awards in the past three years."

Social networking sites such as Facebook and Twitter have provided new opportunities for big energy companies to use electronic media to green their image. Faced with an unprecedented public relations debacle in the wake of the 2010 Gulf Oil spill, British Petroleum COO Mike Utsler, has held several Facebook Q&A sessions during which he fielded questions from people concerned about the progress of BP's cleanup efforts in the Gulf. Interestingly, the public reaction has been varied; some posts have praised BP for its cleanup efforts, particularly along beaches that were hardest hit during the 2010 tourist season, while others contain a note of cynicism. BP officials also tweet updates from around the Gulf coast on almost an hourly basis, that cover everything from the taste of Gulf seafood to dolphin rescue.

Environmental awards, some of which probe the outer limits of credibility, are prominently featured on many energy producers' websites. The Exxon Mobil website touts the corporation's environmental advocacy in an "environmental performance" section in which ExxonMobile boasts about its dedication to clean water and biodiversity. The website also lists several environmental honors the company has won recently, including an extraordinary 2004 award, received by its Houston-based U.S. marine transportation subsidiary, Sea River Maritime, Inc., from an intergovernmental agency consisting of the province of British Columbia, Alaska and several other Pacific states, "for the protection of marine re-

sources," (Exxon Mobil, n.d.) this coming only 15 years after the disastrous Exxon Valdez spill which polluted hundreds of miles of the Alaskan coast and destroyed tens of thousands of square miles of salt water fisheries and habitat for marine animals and birds.

This public relations campaign is not just limited to the petroleum industry. As mentioned previously, Bechtel Corporation contributed large sums of money to the Sierra Club during the height of the Grand Canyon dam controversy while at the same time it was pushing for the construction of the infamous Diablo Canyon Nuclear Power Plant, completed in 1984 (Bechtel's nuclear plant, n.d.), which was built 2.5 miles from a major fault zone north of San Diego, California (California Watch, 2011). Deviating from the current strategy of most energy producers who are attempting to promote the environmental stewardship of the industry as a whole, the nuclear power lobby has launched an all out campaign not just to green its image but to "outgreen" the competition.

During the Grand Canyon Dam controversy of the 1960s, one might infer that Bechtel was using the Sierra Club campaign to promote the use of nuclear power which was also being touted by environmentalists battling the Grand Canyon Dams-as a "clean" energy source. Today, intent need not be infered, for the nuclear power industry's agenda is clearly stated. Consider the position of the Nuclear Energy Institute (NEI) which, on a web page that prominently features a nest laden with Blue Robin's eggs, proclaims that nuclear energy has the "lowest environmental impact," is "emission free," and that nuclear power plants "provide excellent habitat for all species of plants and animals to thrive [sic]." But the NEI site goes even further and includes an entire section devoted to prominent environmentalists who currently endorse nuclear energy as the only solution to global warming. The NEI site also has a kid-friendly link called the "Science Club" which has quizzes, lesson plans, video games, and a link to a cyberspace location called the "Yucca Mountain Youth Zone" (Nuclear Energy Institute, 2000).4 That this "green offensive" has begun to make inroads into the political mainstream is demonstrable from the 2008 presidential campaign during which Democrat Barack Obama endorsed nuclear energy and his Republican challengers-most notably Sarah Palin—touted the benefits of "clean coal" technology, despite the continuing risks of obtaining power from nuclear fission and the reality that "clean coal" is an oxymoron. These risks are easily demonstrated by simply driving past the Cholla (Arizona) coal fired power plant on I-40 in Arizona, or by paying a visit to Grand Canyon

National Park where, on a clear day, one *might* be able to see the north rim from the El Tovar Hotel.<sup>5</sup>

Although this article has presented this "greening" campaign in a somewhat lighthearted manner, consider the case of Dow Chemical which produces a large variety of chemical compounds used in the petroleum refining process, manufactures many plastic and chemical products derived from petroleum, and is developing alternative energy sources such as BioDiesel, a soybean-based fuel. Dow's website prominently displays statements of its corporate philosophy including the following:

Our "Vision of Zero" means we want no injuries, illnesses, accidents, or environmental harm to result from our enterprise. It is a lofty goal, but it is also the only acceptable vision for us to work toward.... Our Environmental Stewardship data takes into account divestitures, mergers, and acquisitions and reflects these activities [emphasis added]. (Dow, n.d.)

Dow Corporation adopted this statement of environmental stewardship and social responsibility in 1996.

Yet Dow's sensitive rhetoric does not seem to match its corporate reality. In 2001, Dow acquired Union Carbide, whose Indian subsidiary was responsible for the Bhopal disaster of December 1984. Union Carbide's website, which is linked to Dow's, states that 3,800 people died and 40 suffered permanent disabilities as a result of the leak (Union Carbide, n.d.b). Other estimates are much higher, putting the initial death toll at 15,000, an additional 8,000-10,000 deaths between 1984 and 2005, and 150,000 people who are severely disabled. In 1989, Union Carbide entered into a settlement agreement in which it paid the injured an average of \$529.00, an amount that translates to about 7 cents a day for those whose suffering continues. When activists confronted Dow spokesperson Kathy Hunt in July of 2002 with these figures replied: "You can't really do more than that, can you? Five-hundred dollars is plenty good for an Indian" (International Campaign for Justice in Bhopal, n.d.). Union Carbide also pledged to clean up the site-something which to this day has never happened. Consequently, the groundwater the residents of Bhopal continue to drink is contaminated. When residents of Bhopal presented 250 gallons of it to Dow's Houston office in March of 2003 to protest the company's inaction, Dow responded by calling U.S. HAZMAT experts dressed in protective suits to take it away and dispose of it (Green, 2003). Both Union Carbide and Dow maintain that they are not responsible for the continuing Bhopal tragedy because Union Carbide sold its Indian subsidiary in 1994 (Union Carbide, n.d.a).

However, in American toxic tort and criminal law, it is a well-established principle that the sale of a subsidiary corporation does not release a parent company or its executives from liability for torts and crimes committed while under the parent's ownership. This extends to any subsequent corporate mergers. Therefore, when Dow purchased Union Carbide in 2001, legally it acquired Union Carbide's liabilities in addition to its assets. That Dow itself has acknowledged this doctrine is evidenced by the fact that it has accepted responsibility for Union Carbide's U.S. liabilities, including a massive Texas asbestos suit settled in 2002. According to Greenpeace, Union Carbide CEO, Warren Anderson, was declared a fugitive from justice in 1992 by the Indian Supreme Court, and the same year the local Bhopal court reaffirmed the criminal liability of Union Carbide and Warren Anderson, charging the company and Anderson with "culpable homicide." Yet despite requests from Indian law enforcement authorities, the United States has failed to extradite him, claiming that he could not be found, despite the fact he was and still is, living a life of luxury in the exclusive beachfront community of Bridgehampton, New York. Despite dozens of protests, Dow executives continue to deflect the responsibility for which Dow is legally culpable (Dow Chemical's Liabilities in Bhopal, 2004) even in light of a recent New York Appeals Court decision that the Union Carbide "settlement" was not all inclusive and that victims of the Bhopal disaster are entitled to file suit for ongoing damages under the legal doctrine of "continuing nuisance." It appears at the time of this writing that Dow's argument that Union Carbide's settlement and sale of its subsidiary company prior to their 2001 merger absolved Dow of liability is without legal merit (Bi v. Union Carbide, 2004).

Attempting to avoid some of the more hyperbolic language on the Greenpeace and other websites, I will allow Dow to have the final word on Bhopal:

Although Dow never owned nor operated the plant, we—along with the rest of industry—have learned from this tragic event, and we have tried to do all we can to assure that similar incidents never happen again... To that end, the chemical industry learned and grew as a result of Bhopal... While Dow has no responsibility for Bhopal, we have never forgotten the tragic event.... (Dow, 2009).

Stay tuned.

Energy producers have been involved in many of the important environmental controversies of the 20th century. Many of these disputes pitted energy producers against environmentalists seeking to preserve natural phenomena. Given the frequency of energy producers' involvement in these iconic disputes, whether over hydroelectric power, coal emissions, nuclear energy, or deep sea oil production, the evidence suggests that the prominent position environmental historians have given them in terms of shaping the discourse is entirely justified. From Hetch Hetchy through Grand Canyon, the Gulf oil disaster and beyond, precedent was and is being set in terms of activism and policy-making and it is within this framework where most environmental disputes have taken place.

Energy companies have also proven to be pathfinders for the rest of corporate America in terms of public relations. During the great environmental battles over scenery, energy companies often attempted to use a "green" image to promote one energy source over another. However, after the 1970s and the implementation of the environmental legislation that governs policymaking today, energy producers have shifted their focus from competition with each other to promoting a green industry image

as a whole—with the exception of nuclear power. This image is communicated globally through corporate websites and social media. Although perhaps there is a degree of sincerity present in some of this corporate advocacy, it appears that the underlying motive for most of this corporate "greening" had been driven by greening of another kind—the color of money. One must also consider how much of this greening would have occurred without years of environmental activism and the legislation that resulted from it. Parents, educators, and environmentalists, who care about the Earth and the legacy that will be left to our children must take the time to identify and reward energy companies that truly embrace an ethical and moral responsibility to people and the environment. Conversely, people *must* also take the time and have the discernment to see through and expose false rhetoric and the corporations that disseminate it. Given what is at stake, we can't afford not to.

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## Notes

- 1. Eric Ford, Executive Vice President and COO of Peabody Coal Company, quoted in a Peabody Coal Company news release (Peabody Coal Company).
- For an in-depth discussion of the Hetch Hetchy controversy, see Michael Cohen, The History of the Sierra Club, 22–31 passim; and Holoway R. Jones, John Muir and the Sierra Club: The Battle for Yosemite (San Francisco: Sierra Club, 1965), 6–8; see also Gifford Pinchot, The Fight for Conservation (Garden City, NY: Harcourt Brace, 1910) 42–50; and Roderick Nash, Wilderness and the American Mind, 134–139; see also Steven Fox, The American Conservation Movement, 139–146.
- 3. For a comprehensive analysis of the Grand Canyon Dam controversy, please see, Byron Pearson, *Still the Wild River*

- Runs: Congress, the Sierra Club and the Fight to Save Grand Canyon, (Tucson: University of Arizona Press, 2002).
- 4. Some of these environmentalists are: Patrick Moore, the Founder of Greenpeace; Hugh Montefiore, the former Chairman of the Friends of the Earth and Norris McDonald, 2003 President of the African American Environmentalist Association who is on record as stating that: "if we NIMBY anywhere and anytime, we should not expect the utility industry to provide electricity to everyone, everywhere, all of the time." (Frost, n.d.)
- 5. Coal fired power plants around Lake Powell and in the Four Corners area have so fouled the once pristine air in Northern Arizona that it is now common for one to not be able to see across Grand Canyon from the national park visitors' center, despite the fact that these power plants are located upwind and are between 90–200 miles away.

## References

- Greenpeace. (2003). Bhopal survivors return toxic waste to Dow Chemicals. Retrieved from http://www.greenpeace.org/usa/en/media-center/news-releases/greenpeace-bhopal-survivors-r/
- Greenpeace. (2004). Dow Chemical's Liabilities in Bhopal. Retrieved from http://www.greenpeace.com/international
- Bi v. Union Carbide. (2004, March 17). U.S. 2d Circuit. Retrieved from http://www.ca2.uscourts.com.gov:81
- BP. (2010, April 15). BP sustainability reporting 2009: Energy challenges and climate change. Retrieved from http://www.bp.com/liveassets/bp\_internet/globalbp/STAG-ING/global\_assets/e\_s\_assets/e\_s\_assets\_2009/downloads\_pdfs/Energy\_challenges\_and\_climate\_change.pdf
- BP. (n.d.). Gulf of Mexico Response. Retrieved from http://www.bp.com/genericarticle.do?categoryId=2012968&contentId=7061663
- Browne, E. J. P. (1998). Energy companies and the environment can coexist-dealing with issues of global climate changes. *USA Today*.
- California Watch. (2011, July 15). Scientists concerned about fault system near Diablo Canyon plance. Retrieved from http://californiawatch.org/environment/scientists-concerned-about-fault-system-near-diablo-canyon-plant-11460
- Chevron Corporation. (n.d.). Retrieved from http://www.chevron.com
- Bechtel Corporation. (n.d.). Bechtel's nuclear plant completion, recovery, and restart experience [Brochure]. Retrieved from http://www.bechtel.com/assets/files/PDF/recovery.pdf
- Dow Chemical Company. (2009). Dow Sustainability-Bhopal. Retrieved from http://www.dow.com/sustainability/debates/bhopal/index.htm
- Dow Chemical Company. (n.d.). Environmental stewardship.

- Retrieved from http://www.dow.com
- Exxon Mobil Corporation. (n.d.). Environmental performance. Retrieved from http://www.exxonmobil.com
- Frost, M. (n.d.). On nuclear energy: A solution that dares not speak its name. Retrieved from http://www.martinfrost.ws/htmlfiles/nuke\_energy1.html
- Grand Canyon National Park Establishment Act (1919). 16 U.S.C. §221.
- Harvey, M. W. T. (1994). A symbol of wilderness: Echo Park and the American conservation movement. Albuquerque: University of New Mexico Press.
- International campaign for justice in Bhopal. (n.d.). The double standards of dirty Dow [Press release]. Retrieved from http://www.bhopal.net/oldsite/campaigningresources/final-info-releases.pdf
- Natural Energy Institute. (2000, August). Managing radioactive waste. http://scienceclub.nei.org/scienceclub/4yourclassproject/4ycp\_wastemanagement.html
- Nuclear Energy Institute. (2000). Managing radioactive waste.

  Retrieved from http://scienceclub.nei.org/scienceclub/4yourclassproject/4ycp\_wastemanagement.html
- Peabody Energy. (2010). Peabody Energy earns top honors for environmental leadership in Colorado [Press release]. Retrieved from http://phx.corporate-ir.net/phoenix.zhtml?c=129849&p=irol-newsArticle&ID=1401534&highlight=
- Peabpody Energy. (n.d.). Environmental stewardship. Retrieved from http://www.peabodyenergy.com/content/254/US
  -Mining/Environmental-Stewardship-
- Sierra Club. (1949, November 12). Special Meeting of the Board of Directors.
- Union Carbide. (n.d.a). Statement of Union Carbide Corporation. Retrieved from http://www.bhopal.com/union-carbide-statements
- Union Carbide. (n.d.b). Bhopal Information Center. Retrieved from http://www.bhopal.com/media-resources/bhopal-information-center