

Exhibit 2

**LOUISIANA CIVIL CASE REPORTING
Civil Case Cover Sheet - LA. R.S. 13:4688 and
Part G, §13, Louisiana Supreme Court General Administrative Rules**

This civil case cover sheet shall be completed by counsel for the petitioner, counsel's authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

Suit Caption:

THE PARISH OF PLAQUEMINES vs. ROZEL OPERATING COMPANY

Court: 25TH JDC Docket Number: _____

Parish of Filing: PLAQUEMINES Filing Date: _____

Name of Lead Petitioner's Attorney: JOHN H. CARMOUCHE

Name of Self-Represented Litigant: _____


Number of named petitioners: 2 Number of named defendants: 9

Type of Lawsuit: Please check the categories which most appropriately apply to this suit (no more than 3 categories should be checked):

- | | |
|---|--|
| <input type="checkbox"/> Auto: Personal Injury | <input type="checkbox"/> Auto: Property Damage |
| <input type="checkbox"/> Auto: Wrongful Death | <input type="checkbox"/> Auto: Uninsured Motorist |
| <input type="checkbox"/> Asbestos: Property Damage | <input type="checkbox"/> Asbestos: Personal Injury/Death |
| <input type="checkbox"/> Product Liability | <input type="checkbox"/> Premise Liability |
| <input type="checkbox"/> Intentional Bodily Injury | <input type="checkbox"/> Intentional Property Damage |
| <input type="checkbox"/> Intentional Wrongful Death | <input type="checkbox"/> Unfair Business Practice |
| <input type="checkbox"/> Business Tort | <input type="checkbox"/> Fraud |
| <input type="checkbox"/> Defamation | <input type="checkbox"/> Professional Negligence |
| <input type="checkbox"/> Environmental Tort | <input type="checkbox"/> Medical Malpractice |
| <input type="checkbox"/> Intellectual Property | <input type="checkbox"/> Toxic Tort |
| <input type="checkbox"/> Legal Malpractice | <input type="checkbox"/> Other Tort (describe below) |
| <input type="checkbox"/> Other Professional Malpractice | <input type="checkbox"/> Redhibition |
| <input type="checkbox"/> Maritime | <input type="checkbox"/> Class action (nature of case) |
| <input type="checkbox"/> Wrongful Death | <input checked="" type="checkbox"/> Enforcement of State Coastal Statutes and State Regulations and Local Coastal Regulations And/or Ordinances. |
| <input type="checkbox"/> General Negligence | |

Please briefly describe the nature of the litigation in one sentence of additional detail:
 ENFORCEMENT OF STATE COASTAL STATUTES AND STATE REGULATIONS AND LOCAL COASTAL REGULATIONS AND/OR ORDINANCES.

Following the completion of this form by counsel, counsel's representative, or by the self-represented litigant, this document will be submitted to the Office of the Judicial Administrator, Supreme Court of Louisiana, by the Clerk of Court.

Name, address and contact information of person completing form:
 Name JOHN H. CARMOUCHE Signature 
 Address 17405 PERKINS ROAD, BATON ROUGE, LA 70810
 Phone number: 225-400-9991 E-mail address: jcarmouche @tcmlawfirm.net

Return Date
Stamped

25TH JUDICIAL DISTRICT COURT FOR THE PARISH OF PLAQUEMINES

STATE OF LOUISIANA

DOCKET NO. 60-996

DIVISION "A"

THE PARISH OF PLAQUEMINES

VERSUS

ROZEL OPERATING COMPANY, CONOCOPHILLIPS COMPANY,
THE LOUISIANA LAND AND EXPLORATION COMPANY LLC,
CHEVRON U.S.A. HOLDINGS INC., CHEVRON U.S.A. INC., THE TEXAS COMPANY,
APACHE OIL CORPORATION, ATLANTIC RICHFIELD COMPANY, AND
LLOG EXPLORATION & PRODUCTION COMPANY, L.L.C.

FILED: NOV 8 - 2013

/s/ BETTINA K. PHILLIPS
DEPUTY CLERK

PETITION FOR DAMAGES
TO THE
PLAQUEMINES PARISH COASTAL ZONE

NOW INTO COURT come plaintiffs, through undersigned counsel, to allege the following:

PARTIES PLAINTIFF AND DEFENDANT

1.

The Plaintiffs are: (1) the PARISH OF PLAQUEMINES, and (2) the State of Louisiana *ex rel.* PARISH OF PLAQUEMINES. The Parish of Plaquemines is a local government of this State that has been authorized as of January 5, 2001 to operate an approved Local Coastal Zone Management Program pursuant to La. R.S. 214.28. As shown more fully below, the Parish of Plaquemines is authorized by state statute to bring appropriate actions on its own behalf and in the name of the State of Louisiana for enforcement of the State and Local Coastal Resources Management Act of 1978, as amended (La. R.S. 214.21, *et seq.*, hereinafter, the "CZM Act of 1978"), and the applicable regulations, rules, orders and ordinances promulgated or adopted thereunder by the State or Plaquemines, as amended (hereinafter, collectively and together with the CZM Act of 1978, the "CZM Laws").

2.

Made defendants herein are the following entities (hereinafter, collectively, **“Defendants”**):

ROZEL OPERATING COMPANY is a domestic corporation, incorporated under the laws of Louisiana, and domiciled in Lafayette, Louisiana. Rozel Operating Company's registered agent, Raymond A. Beyt, is located at 700 East University Ave., Lafayette, LA 70503;

CONOCOPHILLIPS COMPANY is a foreign corporation whose registered agent, United States Corporation Company, is located at 320 Somerulos St., Baton Rouge, LA 70802. ConocoPhillips Company is named as successor in interest to **Conoco, Inc.**;

THE LOUISIANA LAND AND EXPLORATION COMPANY LLC is a foreign company whose registered agent, Corporation Service Company, is located at 320 Somerulos St., Baton Rouge, LA 70802. The Louisiana Land and Exploration Company LLC is named as successor in interest to **The Louisiana Land and Exploration Company**;

CHEVRON U.S.A. HOLDINGS INC. is a foreign corporation whose registered agent, Angie Wang c/o ChevronTexaco, is located at P.O. Box 6028, San Ramon, CA 94583. Chevron U.S.A. Holdings Inc. is named as successor in interest to **Texaco E & P Inc. and Texaco Inc.**;

CHEVRON U.S.A. INC. is a foreign corporation whose registered agent, The Prentice-Hall Corporation System, Inc., is located at 320 Somerulos St., Baton Rouge, LA 70802. Chevron U.S.A. Inc. is named in its own capacity and as successor in interest to **The California Company**;

THE TEXAS COMPANY is a foreign corporation whose registered agent, The Prentice-Hall Corporation System, Inc., is located at 320 Somerulos St., Baton Rouge, LA 70802;

APACHE OIL CORPORATION is a foreign corporation whose registered agent, C T Corporation System, is located at 350 N. St. Paul St., Ste. 2900, Dallas, TX 75201. Apache Oil Corporation is named as successor in interest to **Apache Corporation**;

ATLANTIC RICHFIELD COMPANY is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B, Baton Rouge, LA 70808. Atlantic Richfield Company is named as successor in interest to **Arco Oil and Gas Company – Division of Atlantic Richfield Company**; and

LLOG EXPLORATION & PRODUCTION COMPANY, L.L.C. is a domestic company, organized under the laws of Louisiana, whose member, Gerald Boelte, is domiciled in Louisiana. LLOG Exploration & Production Company, L.L.C.'s registered agent, Kemberlia K. Ducote, is located at 1001 Ochsner Blvd., Suite 200, Covington, LA 70433. LLOG Exploration & Production Company, L.L.C. is named as successor in interest to **LLOG Exploration Company**.

AREAL EXTENT OF COMPLAINED-OF OPERATIONS

3.

In general, Plaintiffs allege below that certain of Defendants' oil and gas exploration, production and transportation operations associated with the development of the Bayou Gentilly, Delacroix Island, and Lake Petit Oil & Gas Fields in Plaquemines Parish were conducted in violation of the CZM Laws and that these activities caused substantial damage to land and waterbodies located in the "**Coastal Zone**" (hereinafter so called), as defined by the CZM Act of 1978, within Plaquemines Parish. A map of the entire Louisiana Coastal Zone is attached hereto as Exhibit A.

In the detailed allegations that follow, the term "**Operational Area**" (hereinafter so called) is used to describe the geographic extent of the area within which the complained-of operations and activities occurred. On information and belief, the areal extent of the Operational Area is identified on the maps contained in Exhibit B attached hereto.

JURISDICTION, VENUE, AND STATUTORY AND REGULATORY FRAMEWORK

4.

The CZM Act of 1978 states that it is the public policy of the state "[t]o protect, develop, and where feasible, restore or enhance the resources of the state's coastal zone." La. R.S. 49:214.22(1).

5.

Louisiana's Coastal Zone is specifically defined in La. R.S. 49:214.24(5). *See* Exhibit A. The Coastal Zone includes "the coastal waters and adjacent shorelands within the boundaries of the coastal zone" The term "coastal waters" includes "bays, lakes, inlets, estuaries, rivers, bayous, and other bodies of water within the boundaries of the coastal zone which have measurable seawater content (under normal weather conditions over a period of years)." La. R.S. 49:214.23(4).

6.

The Operational Area is located in Plaquemines Parish and within the Coastal Zone, and therefore certain activities within the Operational Area are governed by the CZM Laws.

7.

The CZM Laws regulate certain “uses” within the Coastal Zone. La. R.S. 49:214.30 states that “[n]o person shall commence a use of state or local concern without first applying for and receiving a coastal use permit.” A map of the coastal use permits known to have been issued for work within the Operational Area is attached hereto as Exhibit C. A list of those coastal use permits is attached hereto as Exhibit D. The term “use” is defined at La. R.S. 49:214.23(13) as “any use or activity within the coastal zone which has a direct and significant impact on coastal waters.” “Uses of state concern” are defined as:

“Those uses which directly and significantly affect coastal waters and which are in need of coastal management and which have impacts of greater than local significance or which significantly affect interests of regional, state, or national concern. Use of state concern shall include, but not be limited to:

- (a) Any dredge or fill activity which intersects with more than one water body.
- (b) Projects involving use of state owned lands or water bottoms.

* * *

- (f) All mineral activities, including exploration for, and production of oil, gas, and other minerals, all dredge and fill uses associated therewith, and all other associated uses.
- (g) All pipelines for the gathering, transportation or transmission of oil, gas and other minerals.
- (h) Energy facility siting and development.”

(La. R.S. 49:214.25(A)(1)).

8.

“Uses of local concern” are defined as:

“Those uses which directly and significantly affect coastal waters and are in need of coastal management but are not uses of state concern and which should be regulated primarily at the local level if the local government has an approved program. Uses of local concern shall include, but not be limited to:

(a) Privately funded projects which are not uses of state concern.

* * *

(c) Maintenance of uses of local concern.

* * *

(e) Dredge or fill projects not intersecting more than one water body.

* * *

(i) Maintenance dredging.

* * *

(k) Uses on cheniers, salt domes, or similar land forms.”

(La. R.S. 49:214.25(A)(2)).

9.

Enforcement of the CZM Laws is within the authority, *inter alia*, of an appropriate district attorney or a local government with an approved program. La. R.S. 49:214.36D. The Parish of Plaquemines, having obtained approval of its Coastal Zone Management Program from the Secretary of the Louisiana Department of Natural Resources (hereinafter, the “**LDNR**”) on January 5, 2001 is a “local government with an approved program” within the meaning of the CZM Laws. *See* La. R.S. 49:214.23(8) and La. R.S. 49:214.28.

10.

Paragraph D of La. R.S. 49:214.36 states that “[t]he secretary [of the LDNR], the attorney general, an appropriate district attorney, or a local government with an approved program may bring such injunctive, declaratory, or other actions as are necessary to ensure that no uses are made of the coastal zone for which a coastal use permit has not been issued when required or which are not in accordance with the terms and conditions of a coastal use permit.” Accordingly, the Parish of Plaquemines is authorized under the provisions of La. R.S. 49:214.36 to bring appropriate actions in its own behalf and in the name of the State of Louisiana for enforcement of the CZM Laws. Plaintiffs are empowered to bring declaratory, civil damages, or other actions as are necessary to ensure that no uses of state or local concern “are made of the coastal zone for which a coastal use permit has not been issued when required or which are not in

accordance with the terms and conditions of a coastal use permit.” La. R.S. 49:214.36(D); La. R.S. 16:2D.

11.

Paragraph E of La. R.S. 49:214.36 states that “[a] court may impose civil liability and assess damages; order, where feasible and practical, the payment of the restoration costs; require, where feasible and practical, actual restoration of areas disturbed; or otherwise impose reasonable and proper sanctions for uses conducted within the coastal zone without a coastal use permit where a coastal use permit is required or which are not in accordance with the terms and conditions of a coastal use permit. The court in its discretion may award costs and reasonable attorney’s fees to the prevailing party.”

12.

Paragraph G of La. R.S. 49:214.36 states that “[a]ny action pursuant to this Section... must be brought in any parish in which the use or activity is situated.”

13.

Venue for this action in this district is proper under La. R.S. 49:214.36(G). Plaintiffs are the proper parties to bring the causes of action set forth herein pursuant to La. R.S. 49:214.36(D).

14.

Defendants have engaged in uses of state and local concern in Plaquemines Parish within the Operational Area in violation of La. R.S. 49:214.21, *et seq.*

15.

The Louisiana CZM Laws require the secretary of the LDNR to develop a coastal management program and guidelines to further the policies and goals of La. R.S. 49:214.21, *et seq.* The adopted guidelines shall be followed in the development of the state program and local programs and shall serve as criteria for the granting, conditioning, denying, or modifying of coastal use permits. One of the goals of the guidelines is the “careful consideration of the

impacts of uses on water flow, circulation, quantity, and quality and require that the discharge or release of any pollutant or toxic material into the water or air of the coastal zone be within all applicable limits established by law, or by federal, state, or local regulatory authority.” La. R.S. 49:214.27(3).

16.

The state coastal management regulations contemplated by La. R.S. 49:214.21, *et seq.*, are codified at LAC 43:I.700, *et seq.* These state regulations provide that coastal use permits required by La. R.S. 214.30 are *in addition to* “any other permit or approval required or established pursuant to any other constitutional provision or statute.” LAC 43:I.700. These state regulations further provide that “[m]ineral and production sites shall be cleared, revegetated, detoxified, and otherwise restored as near as practicable to their original condition upon termination of operations to the maximum extent practicable.” LAC 43:I.719.M. As discussed below, Defendants have failed to clear, revegetate, detoxify, and restore the mineral and production sites and other areas affected by their operations and activities within the Operational Area to their original condition, as required by LAC 43:I.719.M. Defendants are liable to Plaintiffs under the CZM Laws for all damages associated with their failure to adhere to LAC 43:I.719.M.

17.

The coastal zone regulations further require that “[d]rilling and production sites shall be prepared, constructed, and operated using the best practical techniques to prevent the release of pollutants or toxic substances into the environment.” LAC 43:I.719.F. These regulations also require that:

- “[t]he location and operation of waste storage, treatment, and disposal facilities shall be avoided in wetlands to the maximum extent practicable, and best practical techniques shall be used to minimize adverse impacts which may result from such use.” LAC 43:I.715.A
- “[w]aste facilities located in wetlands shall be designed and built to withstand all expectable adverse conditions without releasing pollutants.” LAC 43:I.715.C.

- “[w]aste facilities shall be designed and constructed using best practical techniques to prevent leaching, control leachate production, and prevent the movement of leachate away from the facility.” LAC 43:I.715.D.
- “[a]ll waste disposal sites shall be marked and, to the maximum extent practicable, all components of waste shall be identified.” LAC 43:I.715.F.
- “[w]aste facilities in wetlands with identifiable pollution problems that are not feasible and practical to correct shall be closed and either removed or sealed, and shall be properly revegetated using the best practical techniques.” LAC 43:I.715.G.
- “[w]aste shall be disposed of only at approved disposal sites.” LAC 43:I.715.H.
- “[r]adioactive wastes shall not be temporarily or permanently disposed of in the coastal zone.” LAC 43:I.715.I.

As alleged below, the operations and activities of Defendants within the Operational Area have resulted in the release of contaminants, pollutants, waste, leachate, and toxic substances into the environment and away from the operated facilities, all in violation of LAC 43:I.715.A through I and LAC 43:I.719.F. Furthermore, the drilling and production sites and waste facilities of Defendants within the Operational Area were not built to withstand all expectable adverse conditions without releasing pollutants, were not prepared using best practical techniques to prevent the release of pollutants or toxic substances, and were not designed and constructed to prevent leaching, control leachate production, or prevent the movement of leachate away from the facility. Defendants are liable for all damages resulting from their violation of the CZM Laws.

18.

Finally, the state coastal zone regulations prohibit the temporary or permanent disposal of radioactive wastes in the coastal zone. LAC 43:I.715.I. The operations and activities of Defendants in the Operational Area have resulted in the disposal of radioactive materials, including radium 226, radium 228, and naturally occurring radioactive materials (NORM), for which Defendants are liable.

FACTUAL ALLEGATIONS

19.

Defendants drilled and/or operated numerous oil and gas wells within the Operational Area. A map showing the oil and gas wells within the Operational Area is attached hereto as Exhibit E. A list of the oil and gas wells drilled and/or operated by each Defendant is attached hereto as Exhibit F. The operations and activities of Defendants alleged in this petition to be in violation of the CZM Laws were conducted (or are being conducted) to enable or support the drilling and operation of the oil and gas wells listed on Exhibit F.

20.

The oil and gas operations and activities of Defendants in the Operational Area included the construction and use of unlined earthen waste pits, which are simply holes, ponds, or excavations dug into the ground or marsh. Many of these waste pits have never been closed or have not been closed in conformance with the state and local CZM Laws and other applicable state environmental laws and regulations, including Statewide Order 29-B and the Louisiana Risk Evaluation/Corrective Action Program (RECAP). Current and historical aerial photographs showing open and/or improperly closed waste pits known to exist within the Operational Area are attached hereto as Exhibit G.

21.

The use of waste pits in the Operational Area has a direct and significant impact on state coastal waters located within Plaquemines Parish, and thus each such pit required a coastal use permit after the enactment of the CZM Act of 1978. To the extent that, contrary to Plaintiffs' allegations, the use of any such waste pit was legally commenced prior to the enactment of the CZM Act of 1978, the continued existence of such waste pit following cessation of the operations supported by it constituted a new use for which a coastal use permit was required. In addition, the closure of any individual waste pits in the Operational Area would have involved substantial movement of materials and substantial alteration of the native terrain, and likewise required a state and/or local coastal use permit. On information and belief, Defendants never

obtained the required state and/or local coastal use permits for the closure and/or post-CZM operations of their waste pits in the Operational Area. Additionally, these waste pits and areas adjacent thereto have never been cleared, revegetated, detoxified, and/or otherwise restored to their original condition as required by LAC 43:I.719.M. Furthermore, Defendants have failed to design and construct their waste pits located in the Operational Area using best practical techniques to prevent leaching and to prevent the movement of leachate away from their waste facilities, as required by LAC 43:I.715.D.

22.

The Defendants use of waste pits in the Operational Area, and their failures to properly close those waste pits, to clear, revegetate, detoxify, and return the property affected thereby to its original condition, and to properly design those waste pits have caused ever increasing damage to the Plaquemines Parish Coastal Zone, for which Defendants are liable under the CZM Laws.

23.

Defendants have also discharged or disposed of oil field wastes from their waste pits and/or from their other oil and gas operations directly into the Operational Area. Each incident involving the discharge of oil field waste, including, without limitation, oil field brines, has a direct and significant impact on state coastal waters located in Plaquemines Parish and constitutes a use for which a state and/or local coastal use permit was required after the enactment of CZM Act of 1978 (Acts 1978, No. 361). On information and belief, Defendants never obtained the required state and/or coastal use permits for the discharge of oil field wastes into the Operational Area. Additionally, the areas of the Plaquemines Parish Coastal Zone that have received such discharges have never been cleared, revegetated, detoxified, and otherwise restored to their original condition as required by LAC 43:I.719.M. Furthermore, Defendants failed to prevent the release of pollutants or toxic substances into the environment in accordance with LAC 43:I.719.F, and failed to design and construct their waste pits in a manner to prevent leaching and the resulting discharge wastes, as required by LAC 43:I.715.D. Finally, Defendants knew or should have known that their oilfield wastes contain unacceptable and inherently

dangerous levels of radioactive materials, including Radium 226 and 228, and thus the discharge of such materials into the Operational Area after 1978 was a flagrant violation of the CZM Laws, particularly LAC 43:I.715.I. As a result of these failures, Defendants are liable under the CZM Laws for damages and the other relief sought herein.

24.

In addition to the use of unpermitted waste pits, the failure to close waste pits properly, and the unpermitted discharge of oil field waste, including, without limitation, oilfield brines, in the Operational Area, Defendants' oil and gas activities have caused the Plaquemines Parish Coastal Zone, and in particular the canals, bayous, sediments, marshes, soils, and groundwaters in the Operational Area, to become contaminated or polluted in excess of applicable state standards, which has a direct and significant impact on state coastal waters. Each of these uses constitutes a use for which a coastal use permit was required beginning with the enactment of the CZM Act of 1978. The state coastal zone regulations, at LAC 43.I.700, *et seq.*, define "contaminant" as "an element causing pollution of the environment that would have detrimental effects on air or water quality or on native floral or faunal species." The contamination deposited in the Operational Area as a result of Defendants' activities has had a detrimental effect on the quality of the receiving state waters, on plant and animal life, and on humans who are exposed to such contamination. In addition, Defendants have utilized the Operational Area for the storage of their pollution or contamination, which likewise is a use for which a state and/or local coastal use permit has been required since 1978. On information and belief, Defendants never obtained the required state and/or local coastal use permits for the deposition or storage of contamination or pollution in the Operational Area. The areas of the Plaquemines Parish Coastal Zone that have been affected by such pollution or contamination have never been cleared, revegetated, detoxified, and otherwise restored to their original condition as required by LAC 43:I.719.M. Furthermore, Defendants have failed to prevent the release of pollutants or toxic substances into the environment in accordance with LAC 43:I.719.F. Defendants have also allowed the accumulation of radioactive materials in the soils and groundwaters of the

Operational Area, in violation of LAC 43:I.715.I. Defendants are thus liable for their acts of contamination in violation of the CZM Laws, including La. R.S. 49:214.36.

25.

Since 1978 and before, Defendants' oil and gas activities have resulted in the dredging of numerous canals in, through, and across the Operational Area. The dredging of canals in the Operational Area has a direct and significant impact on the state coastal waters within Plaquemines Parish. On information and belief, Defendants in some instances exceeded the limits of the coastal use permits issued in connection with the dredging of such canals, and in other instances failed to obtain the coastal use permits required for the dredging of such canals. Furthermore, Defendants failed to design, construct and maintain said canals using the best practical techniques to prevent bank slumping, erosion and saltwater intrusion and to minimize the potential for inland movement of storm-generated surges in accordance with LAC 43:I.705.J. As a consequence thereof, Defendants' dredging activities have resulted in the degradation of the Operational Area, including the erosion of marshes and the degradation of terrestrial and aquatic life therein. Additionally, the destruction of the Plaquemines Parish Coastal Zone has increased the risk of damage from storm-generated surges and other flooding damage, and has enabled and/or accelerated saltwater intrusion. Furthermore, Defendants failed to revegetate, refill, clean, detoxify, and otherwise restore these canals to their original condition as required by LAC 43:I.705.N, 711.F and 719.M.

26.

The above activities of Defendants lie in stark contrast to, and in violation of, the policies enumerated at LAC 43:I.701(G), which states as follows:

“It is the policy of the coastal resources program to avoid the following adverse impacts . . . :

- (4) alterations in the natural concentration of oxygen in coastal waters;
- (5) destruction or adverse alterations of streams, wetland, tidal passes, inshore waters and waterbottoms, beaches, dunes, barrier islands, and other natural biologically valuable areas or protective coastal features;

* * *

- (8) detrimental changes in existing salinity regimes;
- (9) detrimental changes in littoral and sediment transport processes;

* * *

- (13) discharges of pathogens or toxic substances into coastal waters;

* * *

- (16) adverse alteration or destruction of unique or valuable habitats, critical habitat for endangered species, important wildlife or fishery breeding or nursery areas, designated wildlife management or sanctuary areas, or forestlands;

* * *

- (18) adverse disruptions of coastal wildlife and fishery migratory patterns;
- (19) land loss, erosion, and subsidence;
- (20) increases in the potential for flood, hurricane and other storm damage, or increase in the likelihood that damage will occur from such hazards;
- (21) reduction in the long term biological productivity of the coastal ecosystem.

27.

On information and belief, at least some of the activities of Defendants described above may have been permitted and/or authorized by the Louisiana Department of Natural Resources, Office of Conservation (hereinafter, the “**LDNR-OC**”). Paragraph B of La. R.S. 49:214.31 states that “[p]ermits issued pursuant to existing statutory authority of the office of conservation in the Department of Natural Resources for the location, drilling, exploration and production of oil, gas, sulfur or other minerals shall be issued in lieu of coastal use permits, provided that the office of conservation shall coordinate such permitting actions pursuant to R.S. 49:214.31(B) and (D) and **shall ensure that all activities so permitted are consistent with the guidelines, the state program and any affected local program.**” (Emphasis added). The *Memorandum of Understanding Between the Coastal Management Section of the Department of Natural Resources and the Office of Conservation of the Department of Natural Resources*, dated July 8, 1980, reinforces section La. R.S. 49:214.31, wherein it states that the LDNR-OC “will issue in-

lieu permits only if the proposed activity is consistent with the Coastal Use Guidelines, the Louisiana Coastal Resources Program and affected approved local programs.”

28.

To the extent that Defendants operated or conducted activities in the Operational Area under “in lieu” permits authorized or granted by the LDNR-OC or another state agency, Defendants were obligated to comply fully with the CZM Laws in the conduct of such operations or activities.

29.

Furthermore, Plaintiffs allege that most, if not all, of Defendants’ operations or activities complained of herein were not “lawfully commenced or established” prior to the implementation of the coastal zone management program. *See* LAC 43:723(B)(8). The complained-of operations and activities were prohibited prior to 1978 by various provisions of Louisiana Statewide Orders 29, 29-A, and 29-B, various field wide orders, as well as various orders of the Louisiana Stream Control Commission.

30.

Defendants are required to comply not only with all applicable state environmental laws and state regulations, but also with any additional requirements imposed by the State of Louisiana or Plaquemines Parish through the coastal zone management program. Defendants have failed to comply with numerous provisions of the state coastal zone management program, as previously alleged, and thus they are liable under the CZM Laws for any damages resulting from these violations.

31.

The Defendants are liable for the foregoing violations of the state and local CZM Laws, including without limitation, the failure to clear, revegetate, detoxify, and restore to their original condition those portions of the Plaquemines Parish Coastal Zone affected by Defendants’ activities within the Operational Area.

32.

The damages, costs, and attorney fees provided by La. R.S. 49:214.36 are in addition to any fine, forfeiture, other penalty, or costs imposed under any other provision of law.

33.

Notwithstanding any allegations or language to the contrary contained elsewhere in this petition, Plaintiffs expressly limit the scope of the claims and allegations of this petition as follows:

(a) Plaintiffs allege only those state law causes of action that they have a right to pursue under La. R.S. 49:214.21, *et seq.*, as amended, and the state and local regulations, guidelines, ordinances and orders promulgated pursuant thereto and consistent therewith;

(b) Plaintiffs have not pled, and will never at any time in the future plead, any claim or cause of action arising under federal law or federal regulations, and assert no such claims herein; Plaintiffs allege no claims subject to federal question jurisdiction; Plaintiffs do not pursue or allege any claims or causes of action arising under federal common law;

(c) To the extent any state law claims alleged in this petition are preempted by federal law (either expressly or impliedly), such claims are not alleged herein;

(d) Plaintiffs do not pursue or allege any claims that have been discharged in bankruptcy;

(e) Plaintiffs do not pursue or allege any general maritime claims, or any claims subject to maritime or admiralty jurisdiction (28 U.S.C.A. §1333);

(f) Plaintiffs do not pursue or allege any claims “arising under the Constitution, laws, or treaties of the United States”;

(g) Plaintiffs do not allege or pursue any claims wherein their right to relief under any cause of action necessarily depends on a resolution of a substantial, disputed question of federal law;

(h) Plaintiffs do not allege or pursue any claims arising under the Rivers and Harbors Act of 1899, as amended, or any regulations issued pursuant thereto (hereinafter, collectively, the “RHA”), and do not pursue or allege any claims arising under any U.S. Army Corps of Engineers regulations or permits;

(i) Plaintiffs do not pursue or allege any claims arising under the Clean Water Act of 1972, as amended, or any regulations issued pursuant thereto (hereinafter, collectively, the “CWA”);

(j) Plaintiffs do not pursue or allege any claims arising under any federal regulations of any kind or character whatsoever;

(k) Plaintiffs do not allege or pursue any claim that any Defendant violated a federal permit or failed to obtain a federal permit;

(l) Plaintiffs do not allege that they are third party beneficiaries of any obligation between Defendants and any governmental body, or that they are third party beneficiaries of any permitting scheme;

(m) Plaintiffs do not allege that they are third party beneficiaries of any permit, contract, or right of way agreement, or other conventional servitude or servitude imposed by law;

(n) Plaintiffs do not allege that they have the right to enforce a federal permit as a third party beneficiary;

(o) Plaintiffs do not allege that they represent any class; further, Plaintiffs do not pursue or allege any claim over which there is CAFA jurisdiction of this case; Plaintiffs bring this action only on their own behalf and not on behalf of any class or group of individuals or legal entities.

(p) Plaintiffs do not allege that any acts, omissions, operations or activities occurring on the Outer Continental Shelf violated the CZM Laws. None of the acts, omissions, operations or activities that form the basis of the Plaintiffs’ claims in this petition involve operations or activities on the Outer Continental Shelf. Plaintiffs do not pursue or allege any claim arising

under the Outer Continental Shelf Lands Act (the "OCSLA") (43 U.S.C. § 1331 *et seq.*); Plaintiffs do not pursue or allege any claim subject to the jurisdiction of the OCSLA; further, Plaintiffs do not pursue or allege any claim within the jurisdiction established by 43 U.S.C. § 1349;

(q) Plaintiffs do not pursue or allege any claim involving federal lands, do not pursue or allege any claims covered by federal enclave jurisdiction, and do not pursue or allege any claims regarding any land held in trust by the federal government, its officers, agencies, or agents; Plaintiffs do not pursue or allege any claims over which the federal government contests title. Plaintiffs do not pursue or allege any claims for damages to any federal floodwalls, federal levees, or any other federal installations or properties. Plaintiffs do not allege that any event, activity, or claim pursued in this petition occurred on a federal enclave. Plaintiffs do not allege or pursue any claim for an alleged injury in circumstances where the alleged injury arose on a federal enclave and the injury is indivisible from an injury that did not occur on a federal enclave.

(r) Plaintiffs do not allege that any Defendant or Defendants committed a maritime tort or violated a federal maritime law or regulation;

(s) Plaintiffs make no claims sounding in general maritime law or admiralty law; further, Plaintiffs do not seek remediation or other remedies to the extent such remedies will have a potentially disruptive impact on maritime commerce or activity; Plaintiffs make no claim herein for the enforcement of any statute or regulation that conflicts with, or is preempted by, federal maritime law or federal maritime regulations;

(t) Plaintiffs make no claims under Louisiana tort law, contract law, mineral law, or property law;

(u) Plaintiffs do not allege or pursue any claims that are: (1) covered by or subject to the jurisdiction of the All Writs Act, 28 U.S.C. §1651, *et seq.*, as amended; or, (2) covered by or subject to the jurisdiction of the Convention on the Recognition of Foreign Arbitral Awards,

9 U.S.C. §201, et seq., as amended. Plaintiffs do not allege or pursue any claims under the federal Oil Pollution Act of 1990, as amended;

(v) In summary, Plaintiffs limit the claims asserted in this petition to state law claims arising under the CZM Laws. The attachment of the map of the entire Louisiana Coastal Zone (See Exhibit A) or the attachment of any other exhibits to this petition shall in no way be interpreted as an expansion of the scope of the specific state law claims alleged in this petition. With regard to any permit alleged in this petition to have been violated, the inclusion of language in such permit referring to federal laws or federal regulations shall in no way be interpreted as an expansion of the scope of the specific state law claims alleged in this petition. Any allegation in this petition that any defendant has violated a coastal use permit shall not be construed as an allegation that any such defendant has violated any federal law or regulation generally or specifically referenced in the permit or any application therefor. Further, to the extent the CZM Laws contain any citation of or reference to any federal laws, statutes or regulations, no claims or causes of action are alleged under those federal laws, statutes or regulations. Any allegation in this petition that any defendant has violated the CZM Laws shall not be construed as an allegation that any such defendant has violated any federal laws, statutes or regulations referenced in the CZM Laws. The quotation or reference in this petition to provisions of certain CZM Laws concerning “uses” of national or regional concern shall not be construed as an allegation that Plaintiffs are making claims arising under the Constitution, laws, or treaties of the United States. The use of the term “navigation” or such similar terms in the CZM Laws shall not be construed to imply that Plaintiffs are asserting maritime or admiralty claims.

(w) Plaintiffs do not plead any claim or cause of action pertaining to private property located within the Plaquemines Parish Coastal Zone: (1) that is the subject of any present or future demand for environmental restoration or remediation, regardless of whether the relief demanded is specific performance, damages or a mandatory or prohibitive injunction; or, (2) that is the subject of any pending or future litigation under Act 312 of 2006 (La. R.S. 30:29, et seq., as amended). Plaintiffs do not seek injunctive relief. Further, Plaintiffs do not plead any claims related to any pending environmental statutory or regulatory claims or actions filed or taken by

any federal agency, including, but not limited to, the Environmental Protection Agency and the U.S. Army Corps of Engineers.

34.

Subject to all of the limitations set forth in this petition, including, but not limited to, paragraph 33, Plaintiffs Parish of Plaquemines and State of Louisiana claim all damages and remedies appropriate under the CZM Laws, including, but not limited to, restoration and remediation costs; actual restoration of disturbed areas to their original condition; costs necessary to clear, revegetate, detoxify and otherwise restore the affected portions of the Plaquemines Parish Coastal Zone as near as practicable to its original condition pursuant to LAC 43:I.705.N, 711.F and 719.M; declaratory relief in circumstances where such relief is required, in addition to money damages, to accomplish the purposes of La. R.S. 49:214.21 *et seq.*; costs and expenses of litigation, including costs of environmental assessments and expert costs, and reasonable attorney's fees; and all other damages or remedies provided for in La. R.S. 49:214.21, *et seq.*

35.

Plaintiffs demand trial by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs demand judgment against Defendants (subject to the limitations set forth in this petition), as follows:

(a) Awarding damages and other appropriate relief specifically provided in the CZM Laws for violations of all applicable state coastal zone management program statutes and regulations within the Plaquemines Parish Coastal Zone;

(b) Ordering the payment of costs necessary to clear, revegetate, detoxify and otherwise restore the Plaquemines Parish Coastal Zone as near as practicable to its original condition pursuant to LAC 43:I.705.N, 711.F and 719.M.

- (c) Requiring actual restoration of the Plaquemines Parish Coastal Zone to its original condition.
- (d) Awarding reasonable costs and attorney fees.
- (e) Awarding pre-judgment and post-judgment interest at the maximum rate allowable by law;
- (f) Such other and further relief available in the premises, subject to the limitations set forth in the petition.
- (g) Plaintiffs request trial by jury.

Respectfully submitted,

TALBOT, CARMOUCHE & MARCELLO
 17405 Perkins Road
 Baton Rouge, LA 70810
 Telephone: (225) 400-9991
 Fax: (225) 448-2568



DONALD T. CARMOUCHE, ESQ. (2226)
 VICTOR L. MARCELLO, ESQ. (9252)
 JOHN H. CARMOUCHE, ESQ. (22294)
 WILLIAM R. COENEN, III, ESQ. (27410)
 BRIAN T. CARMOUCHE, ESQ. (30430)
 TODD J. WIMBERLEY, ESQ. (34862)
 ROSS J. DONNES, ESQ. (33098)
 D. ADELE OWEN, ESQ. (21001)
 LEAH G. COTTON, ESQ. (35092)

PHILIP F. COSSICH, JR., ESQ. (1788)
 DARREN SUMICH, ESQ. (23321)
 DAVID A. PARSIOLO, ESQ. (21005)
 BRANDON J. TAYLOR, ESQ. (27662)
**COSSICH, SUMICH,
 PARISOLA & TAYLOR, L.L.C.**
 8397 Highway 23, Suite 100
 Belle Chasse, LA 70037-2648
 Telephone: (504) 394-9000
 Fax: (504) 394-9110

W. PETER CONNICK, ESQ. (14158)
CONNICK AND CONNICK
 2551 Metairie Road
 Metairie, LA 70001
 Telephone: (504) 8383-8777
 Fax: (504) 838-9903

BRUCE D. BURGLASS, JR., ESQ. (14112)
ANDRÉ C. GAUDIN, ESQ. (20191)
SCOTT O. GASPARD, ESQ. (23747)
BURGLASS & TANKERSLEY, LLC
5213 Airline Drive
Metairie, LA 70001-5602
Telephone: (504) 836-0407
Fax: (504) 287-0447

PLEASE SERVE THE PETITION FOR DAMAGES:

ROZEL OPERATING COMPANY

Through its registered agent for service of process:
Raymond A. Beyt
700 East University Ave.
Lafayette, LA 70503

CONOCOPHILLIPS COMPANY

Through its registered agent for service of process:
United States Corporation Company
320 Somerulos St.
Baton Rouge, LA 70802

THE LOUISIANA LAND AND EXPLORATION COMPANY LLC

Through its registered agent for service of process:
Corporation Service Company
320 Somerulos St.
Baton Rouge, LA 70802

CHEVRON U.S.A. INC.

Through its registered agent for service of process:
The Prentice-Hall Corporation System, Inc.
320 Somerulos St.
Baton Rouge, LA 70802

THE TEXAS COMPANY

Through its registered agent for service of process:
The Prentice-Hall Corporation System, Inc.
320 Somerulos St.
Baton Rouge, LA 70802

ATLANTIC RICHFIELD COMPANY

Through its registered agent for service of process:
C T Corporation System
5615 Corporate Blvd., Ste. 400B
Baton Rouge, LA 70808

LLOG EXPLORATION & PRODUCTION COMPANY, L.L.C.

Through its registered agent for service of process:
Kemberlia K. Ducote
1001 Ochsner Blvd., Suite 200
Covington, LA 70433

**PLEASE SERVE THE PETITION FOR DAMAGES
THROUGH THE LOUISIANA LONG ARM STATUTE:**

CHEVRON U.S.A. HOLDINGS INC.

Through its registered agent for service of process:

Angie Wang c/o ChevronTexaco

P. O. Box 6028

San Ramon, CA 94583

APACHE OIL CORPORATION

Through its registered agent for service of process:

C T Corporation System

350 N. St. Paul St., Ste. 2900

Dallas, TX 75201

EXHIBIT A

Louisiana Coastal Zone Boundary

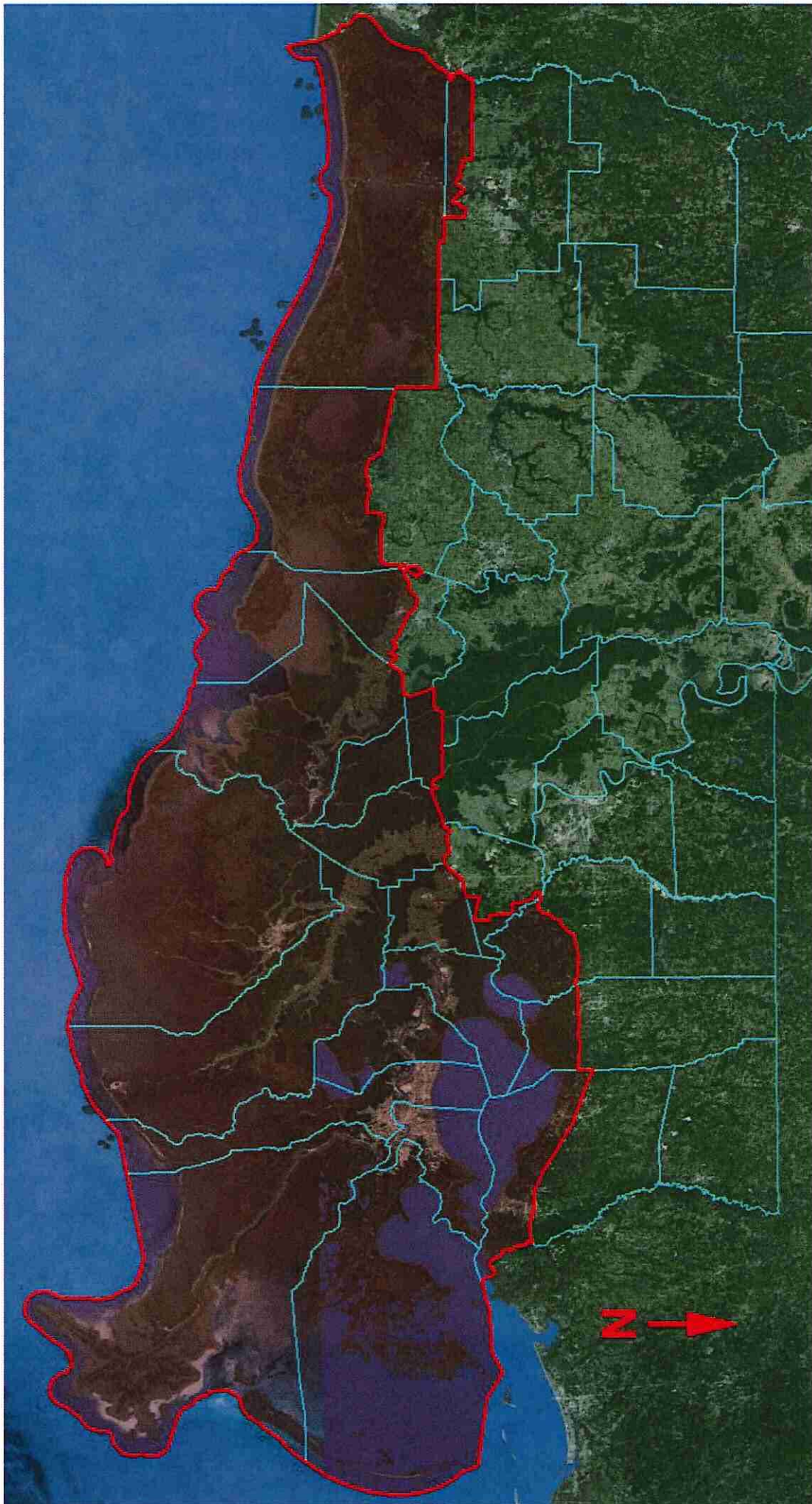


EXHIBIT B

Map of the Operational Area

(Overview)



EXHIBIT B

Map of the Operational Area

(Detail View)

2013 Aerial

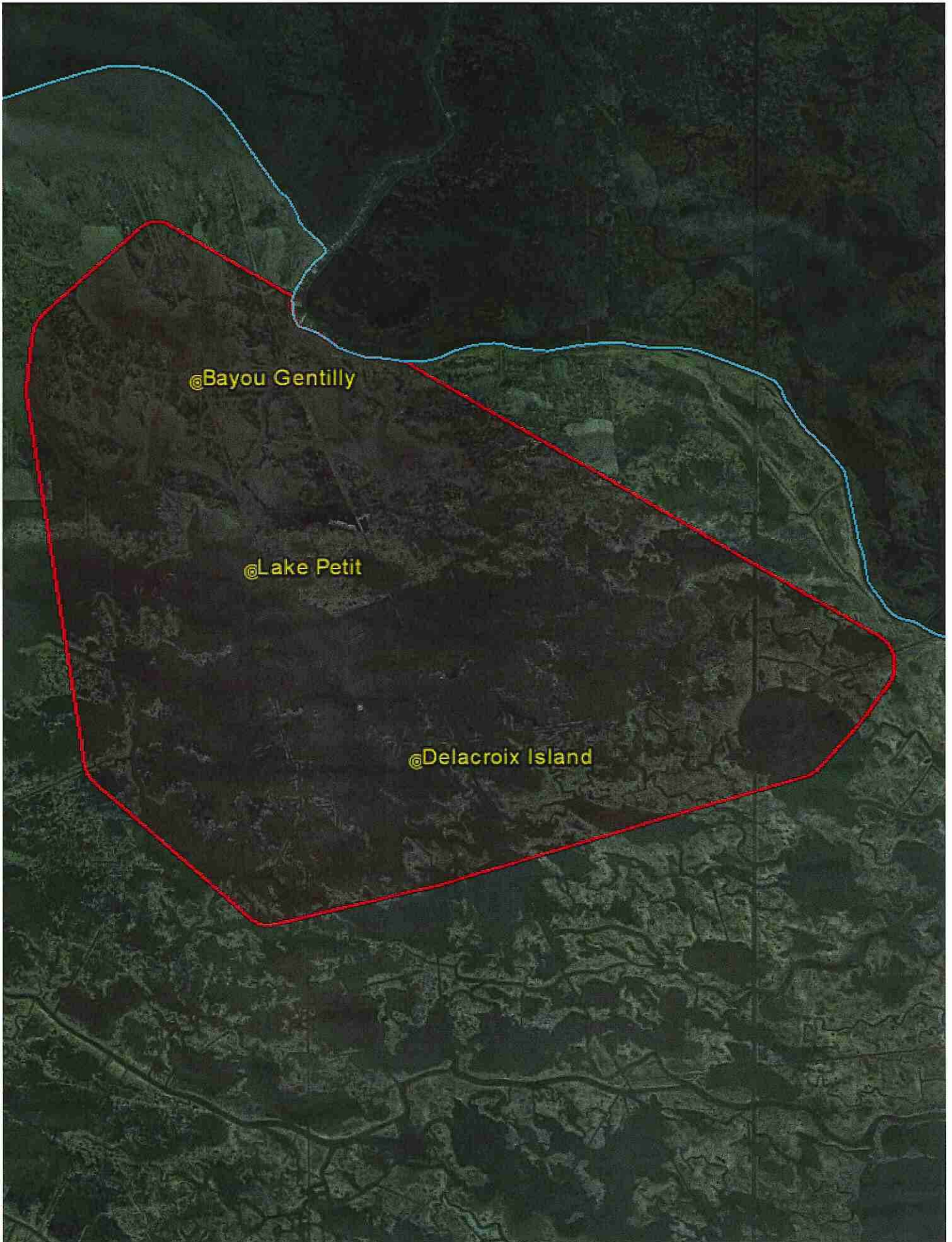


EXHIBIT C

Map of Coastal Use Permits within the Operational Area

Yellow and orange shapes represent work locations described in Coastal Use Permits.

Source: LDNR

2013 Aerial

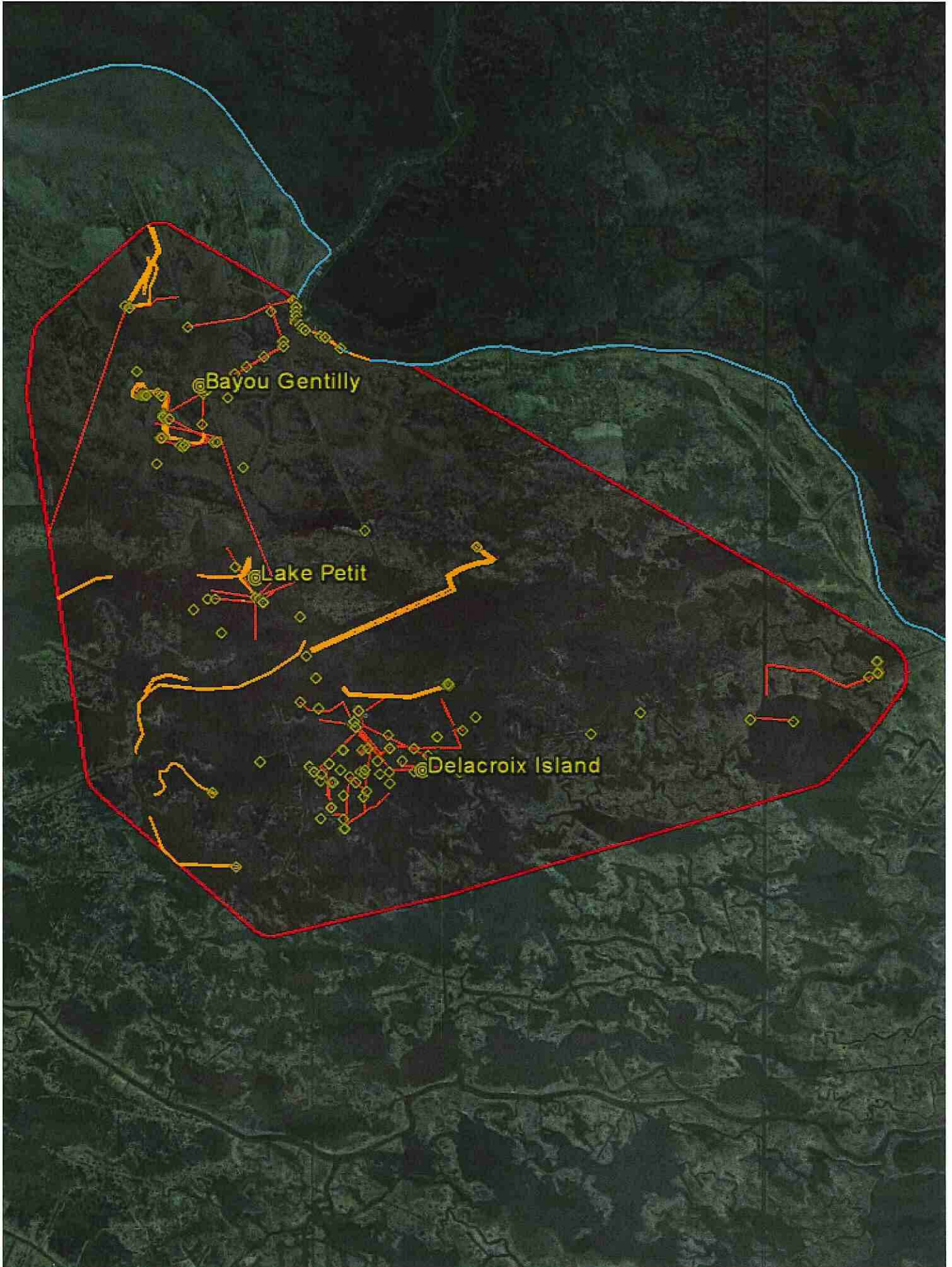


EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

CUP No.	Description
P19800143	DREDGING OF CANAL FOR OIL AND GAS EXPLORATION
P19800210	GAS // 2.875" GAS FLOWLINE // LAID ON MARSH & BURIED 3 FT BELOW WATER // // ORIGIN: TANK BATTERY NO 1 // ENDPOINT: VUA SL 335 DEU WELL NO 58
	VUA; SL 335 DEU WELL NO 58
P19810618	DREDGE CANAL AND SLIP EXISTING CANAL FOR OIL AND GAS EXPLORATION
P19810890	INSTALL AND MAINTAIN A DRILLING BARGE, PLATFORM, APPURTENANT STRUCTURES
P19811217	DREDGE CANAL AND SLIP FOR OIL AND GAS EXPLORATION
P19811725	// 4" GAS FLOWLINE // // // ORIGIN: // ENDPOINT: // 6" GAS FLOWLINE // // // ORIGIN: // ENDPOINT: GAS // 6" GAS FLOWLINE // // // ORIGIN: // ENDPOINT:
P19811758	GAS // 4" S/40 GAS SALES LINE // BURIED 5 FT BELOW MUD LINE // // ORIGIN: // ENDPOINT:
P19821161	DREDGING , CLEANING, AND RECONSTRUCTION OF BOAT SLIPS
P19821453	NATURAL GAS // 2" GAS FLOWLINE // BURIED 3 FT // REESE OIL & GAS CO. LINE // ORIGIN: // ENDPOINT:
P19821500	FLOWLINE // 4" FLOWLINE // // // ORIGIN: // ENDPOINT:
P19831517	FLOWLINE // 4" FLOWLINE // // // ORIGIN: // ENDPOINT: INSTALL AND MAINTAIN BULKHEAD, PIER AND FILL FOR PRIVATE USE
P19840451	NOT FOUND
P19841428	PROPOSED WELL SITE
P19850456	DRIVE PILINGS, CONSTRUCT WALKWAY
P19860196	PROPOSED PRODUCTION PLATFORM TO SERVE TANK BATTERY NO. 1
P19860331	PROPOSED FLOWLINE TO SERVE WELL NO. 50
P19860381	FLOWLINE TO SERVE WELL NO. 4
P19860713	GAS // 4.5" GAS // 3' MIN COVER, 5' MIN COVER @ XING // F.CHAPLAIN WELL#1 TO UNITED GAS TIE-IN, TEJAS POWER // ORIGIN: // ENDPOINT:
P19860726	PROPOSED PIPELINE JUNCTION PLATFORM TO SERVE DELACROIX FIELD
P19860747	EXCAVATION, BACKFILL
P19860767	FLOWLINE, EXCAVATE AND BACKFILL, PLATFORM GAS // 4.5" GAS // 3' MIN COVER // METERING PLATFORM TO RISER PLATFORM, TEJAS POWER CORP. // ORIGIN: // ENDPOINT:
P19870225	MAINTENANCE DREDGING OF CANALS AND CHANNELS
P19870836	PLUG AND ABANDON DELACROIX 1-D WELL
P19880698	GAS // 2.875" GAS LIFT LINE // LAID ON MARSH AND 3' BLW WATERBOTTOMS // DELECROIX FIELD WELL#47 TO WELL#42, TEXACO INC // ORIGIN: // ENDPOINT:
P19880700	PROPOSED PIPELINES TO SERVE SL 1246 UNIT 9 WELL NO. 13
P19890271	DRILLING OPERATIONS AND INSTALLATION OF WELL PROTECTION STRUCTURE SL 335 WELL NO. 60
P19890948	DREDGING AND DRILLING STRUCTURES TO SERVE PROPOSED WELLS 59, 60, 61, 62 AND 63,

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

CUP No.	Description
P19890949	GAS LIFT LINE // 3" GAS LIFT LINE // SURFACE OF MARSH, 3' MIN BLW MUDLINE // 2OF2: S/L 335 WELL#60 TO GAS LIFT TIE-IN, TEXACO // ORIGIN: // ENDPOINT:
	OIL // 2.875" OIL // SURFACE OF MARSH, 3' MIN BLW MUDLINE // 1OF2: S/L 335 WELL#60 TO TANK BATTERY, TEXACO // ORIGIN: // ENDPOINT:
P19890963	GAS // 3" GAS // BURIED BY BACKFILL, MARSH SURFACE // S/L 335 WELL#59 TO TANK BATTERY, TEXACO // ORIGIN: // ENDPOINT:
P19890964	LOCATE A DRILLING BARGE ON A DRILL SITE
P19890965	GAS // 3" GAS // 3' MIN BLW MUDLINE // S/L 335 WELL#61 TO TANK BATTERY, TEXACO // ORIGIN: // ENDPOINT:
P19890999	LOCATE DRILLING BARGE IN EXISTING OIL FIELD CANAL/SLIP TO DRILL OIL/GAS WELL
P19891000	GAS // 3" GAS // SURFACE OF MARSH, 3' BLW MUDLINE @ XING // S/L335 WELL#62 TO HEATER PLTFRM, TEXACO // ORIGIN: // ENDPOINT:
P19900580	PROPOSED PLATFORMS, BOAT DOCK, TO SERVE TANK BATTERY NO. 1
P19900949	GAS // 3" GAS LIFT LINE // LAID ON MARSH AND BURIED 3 FT BELOW BOTTOM // TEXACO LINE FROM SL 335 WELL 59 TO GAS TIE-IN // ORIGIN: // ENDPOINT:
P19901118	PROPOSED BOAT SLIP TO SERVE TANK BATTERY NO. 1
P19901170	GAS // 2.875" // 3' MIN BLW ML // TEXACO WITHDRAWS PERMIT // ORIGIN: SL 335 WELL #18 // ENDPOINT: SL 335 WELL #24
P19901220	REMOVE ABANDONED RISERS AND PLATFORMS
P19901276	CONSTRUCT A HEATER PLATFORM AND A WALKWAY TO PRODUCE SL 335 NO. 42 WELL
P19910371	CLEANOUT EXISTING CANAL TO ACCESS A WELL SITE TO DRILL
P19910620	GAS LIFT LINE // 3" GAS LIFT LINE // MARSH SURFACE, 3' MIN BLW MUDLINE @ X-INGS // TEXACO, INC. // ORIGIN: S.L. 335 WELL #63 // ENDPOINT: EXISTING TANK BATTERY #1
	OIL FLOWLINE // 2.875" OIL FLOWLINE // MARSH SURFACE, 3' MIN BLW MUDLINE @ X-INGS // TEXACO, INC. // ORIGIN: S.L. 335 WELL #63 // ENDPOINT: EXISTING TANK BATTERY #1
P19910621	GAS FLOWLINE // 3" GAS FLOWLINE NATURAL GAS // MARSH SURFACE, 3' MIN BLW MUDLINE @ X-INGS // TEXACO, INC. // ORIGIN: S.L. 335 WELL # 64 // ENDPOINT: EXISTING TANK BATTERY # 2
	OIL FLOWLINE // 2.875" FLOWLINE_CRUDE OIL // MARSH SURFACE, 3' MIN BLW MUDLINE @ X-INGS // TEXACO, INC. // ORIGIN: S.L. 335 WELL # 64 // ENDPOINT: EXISTING TANK BATTERY # 2
P19911245	PROPOSED PILING CLUSTERS AND DOCK TO SERVE TANK BATTERY NO. 2
P19920103	PROPOSAL TO INSTALL CHANNEL MARKERS TO SERVE SL 335 WELLS 36, 4, 68, 27, 35, 37
P19921005	CRUDE OIL // 2 7/8" FLOWLINE // 3' MIN BLW ML // TEXACO INC // ORIGIN: WELL NO 64 // ENDPOINT: TANK BATTERY NO 1
	NATURAL GAS // 3" GAS LINE // 3' MIN BLW ML // TEXACO INC // ORIGIN: WELL NO 64 // ENDPOINT: TANK BATTERY NO 1

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

CUP No.	Description
P19940450	GAS // 2.875" GAS LIFT LINE // ON GROUND; 3' MIN BLW ML & P/LS // TEXACO // ORIGIN: SL 335 DEU WELL # 65 // ENDPOINT: EXISTING GAS LINE
	OIL // 2.875" FLOWLINE // ON PIPEBENTS; ON GROUND; 3' MIN BLW ML & PLS // TEXACO // ORIGIN: SL 335 DEU WELL # 65 // ENDPOINT: TANK BATTERY # 1
P19961414	TIMBER BULKHEAD & EARTHEN PLUG REPAIRS
P19970407	FLOWLINE // 2" // 4' MIN BLW ML // PROJECT CANCELLED - APACHE CORP // ORIGIN: SL 335 NO. 50 WELL // ENDPOINT: TANK BATTERY #1
	GAS LIFT // 2" // 4' MIN BLW ML // PROJECT CANCELLED - APACHE CORP // ORIGIN: SL 335 WELL NO. 33 // ENDPOINT: SL 335 NO. 62 WELL
P19970436	INSTALL 17 DRY FIRE HYDRANTS
P19970825	CUT & CAP 6" RISER & 8" RISER
	EXISTING // 3" // GONE // PIPELINE RETIREMENT - SOUTHERN NATURAL GAS CO // ORIGIN: TIMBER PLATFORM TO REMOVE // ENDPOINT: TIMBER PIPE SUPPORT, RISER
	EXISTING // 8" // 3' BLW ML // CUT & CAP - SOUTHERN NATURAL GAS CO // ORIGIN: TIMBER PLATFORM TO REMOVE // ENDPOINT: TIMBER PLATFORM
	REMOVE 2-PIPE SUPPORTS & PLATFORM & DOCK
	REMOVE TIMBER PIPE SUPPORT
	REMOVE TIMBER PLATFORM ; CUT & CAP P/L
P19971028	CHANNEL AND SPOIL PLACEMENT
P19971475	FLOWLINE // 4" // LAID ON WALKWAY / 3' MIN BLW ML @ CANAL XING // // ORIGIN: WELL #1 // ENDPOINT: XISTING RISER
	FLOWLINE // 4" // LAID ON WALKWAY // // ORIGIN: WELL #1 // ENDPOINT: PROPOSED PRODUCTION BARGE
	PRODUCTION BARGE + BOAT DOCK
P19980338	FLOWLINE // 3" // MARSH LEVEL, 4' MIN BLW MUDLINE // // ORIGIN: S/L 335 WELL#23 // ENDPOINT: TANK BATTERY#2 (SW OF ORIGINATION)
P19980403	CLEANOUT ROADSIDE DITCHES & MAINTENANCE ON LA 300
P19981615	SL 335 WELL #12 SITE CLEARANCE
	SL 335 WELL #13 SITE CLEARANCE
	SL 335 WELL #15-15-D SITE CLEARANCE
	SL 335 WELL #2 SITE CLEARANCE
	SL 335 WELL #20 SITE CLEARANCE
	SL 335 WELL #21 SITE CLEARANCE
	SL 335 WELL #32 SITE CLEARANCE
	SL 335 WELL #4 SITE CLEARANCE
	SL 335 WELL #46-46-D SITE CLEARANCE
	SL 335 WELL #6 SITE CLEARANCE
P19981741	FLOWLINE // 4" // 4' MIN BLW MUDLINE // // ORIGIN: S/L 335 #24 WELL // ENDPOINT: TANK BATTERY
P19990116	EXISTING LINE // 8" REPLACEMENT LINE // 2' MIN BLW MUDLINE // REMOVE & REPLACE P/L // ORIGIN: EXISTING 16" P/L // ENDPOINT: PLATFORM (SUPPORT STR) 8' X 22'
	RESETTING PIPELINE BLOWDOWN APARATUS

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

CUP No.	Description
P19990274	BULKHEAD
P19990756	BOAT SLIP
P19991209	BOATSLIPS, PILINGS
P19991491	FIBER OPTIC CABLE // 3/8" CABLE // 3' BLW ML // CABLE THROUGH 4" EXISTING STR OVER CANAL // ORIGIN: EXISTING BELL SOUTH FACILITY // ENDPOINT: DELACROIX C. O.
P20000391	BOAT SLIP
P20000864	DRILL
P20001252	BOAT SLIP
P20001851	BARGE, SHELL PAD
P20001884	PIPELINE // 6" PIPELINE // 3' MIN BLW ML // // ORIGIN: PRODUCTION BARGE // ENDPOINT: EXISTING TAP
	SALES LINE // 4.5" // 3' MIN BLW ML // TRANSFER FROM SOUTHEASTERN LA PIPELINE.LLC // ORIGIN: EXISTING PRODUCTION BARGE // ENDPOINT: EXISTING TAP
P20010473	PROPWASHING
P20010488	WELL SITE CLEARANCE
P20010940	WELL
P20010941	WELL
P20011154	FLOWLINE // 3" // 4' MIN BLW ML // // ORIGIN: WELL #2; W.G.SMITH // ENDPOINT: EXISTING PRODUCTION BARGE
	FLOWLINE // 3" // 4' MIN BLW MUDLINE // 1OF2 // ORIGIN: WELL #2 // ENDPOINT: PRODUCTION BARGE
	FLOWLINE // 3" // 4' MIN BLW MUDLINE // 2OF2 // ORIGIN: WELL #2 // ENDPOINT: PRODUCTION BARGE
P20011387	FLOWLINE // 3" // 3' MIN BLW MUDLINE // 1OF2 // ORIGIN: WELL #1 // ENDPOINT: PRODUCTION BARGE
	FLOWLINE // 3" // 3' MIN BLW MUDLINE // 2OF2 // ORIGIN: WELL #1 // ENDPOINT: PRODUCTION BARGE
P20011395	PIPELINE // 6" // 3' - 6' MIN BLW MUDLINE // WITHDRAWN PERMIT // ORIGIN: PRODUCTION PLATFORM // ENDPOINT: EXISTING TAP
P20011837	MARINA/RESIDENTIAL DEV.
P20011863	FLOWLINE // 6" // 3' - 5' MIN BLW MUDLINE // 1OF2 WITHDRAWN PERMIT // ORIGIN: WELL #001 // ENDPOINT: EXISTING FACILITY
	FLOWLINE // 6" // 3' - 5' MIN BLW MUDLINE // 2OF2 WITHDRAWN PERMIT // ORIGIN: WELL #001 // ENDPOINT: EXISTING FACILITY
P20020002	BOAT SLIP
P20020740	BOAT SHED
P20021016	BOAT SHED, COVERED DECK
P20030823	COVERED BOAT DOCK
P20030906	SITE CLEARANCE APACHE WELL NO 010
	SITE CLEARANCE APACHE WELL NO 048
	SITE CLEARANCE APACHE WELL NO 048D
	SITE CLEARANCE APACHE WELL NO 056
P20031035	PROPWASH + 3-PILE CLUSTERS
	SHELL PAD, STRUCTURES DELACROIX CORP. NO 1 WELL
P20031127	BARGE, PLATFORM, STRUCTURES LLOG LOC NO 1
	WHEEL WASHING
P20040158	CLEANOUT, SLIP, STRUCTURES GONZALES NO 1 WELL

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

CUP No.	Description
	PROPWASH
P20041402	PROPWASH & 3-PILE CLUSTERS
	SHELL PAD, STRUCTURES DELACROIX CORP NO 2 WELL
P20050337	CLEANOUT
	DRILL BARGE/STRUCT BAYOU GENTILLY PROSPECTS 1 & 2
	SPOIL
P20050841	FLOWLINE // 6" // 3' - 4' MIN BLW ML // 1 OF 1 // ORIGIN: BAYOU GENTILLY PROSPECTS 1 & 2 // ENDPOINT: EXISTING FACILITY
	PRODUCTION PLATFORM (20' X 40')
P20050982	DRILL BARGE/STRUCTURES BAYOU GENTILLY #23 PROSPECT
	MAINTENANCE DREDGING
	SPOIL
P20050984	BANK STABILIZATION
	FLOWLINE // 3" // 3' MIN BLW ML & LAID ON EXISTING MARSH // 1 OF 1 // ORIGIN: DELACROIX CORP. NO 1 WELL // ENDPOINT: EXISTING BRAUN FACILITY
	FLOWLINE // 3" // 3' MIN BLW ML & LAID ON EXISTING MARSH // 1 OF 1 // ORIGIN: OMEADOW ROBIN NO. 1 WELL // ENDPOINT: EXISTING BRAUN FACILITY
	HEATER PLATFORM: 15' X 15'
	HEATER PLATFORM: 15' X 15' @ P.I.
P20051003	BANK STABILIZATION
	FLOWLINE // 4" // TOP OF MARSH & 3' MIN BLW ML // 1 OF 1 // ORIGIN: EXISTING BRAUN FACILITY // ENDPOINT: EXISTING PIPELINE RISER
P20051008	PROPWASH
	SPOIL
	WELL LOCATION & STRS: DELACROIX CORP NO 2 WELL
P20051626	DRILL BARGE/STRUCT BAYOU GENTILLY PROSPECTS 1 & 2
P20060566	MAINTENANCE DREDGING
	SPOIL
P20061026	CLEANOUT/STRUCTURES DELACROIX CORP NO 1 WELL
	PROPWASH
P20061801	SITE CLEARANCE APACHE WELL NO 001
	SITE CLEARANCE APACHE WELL NO 005
	SITE CLEARANCE APACHE WELL NO 024
	SITE CLEARANCE APACHE WELL NO 041
	SITE CLEARANCE APACHE WELL NO 042
	SITE CLEARANCE APACHE WELL NO 043
	SITE CLEARANCE APACHE WELL NO 047
	SITE CLEARANCE APACHE WELL NO 057
	SITE CLEARANCE APACHE WELL NO 060
	SITE CLEARANCE APACHE WELL NO 062
P20070196	FLOWLINE REMOVAL // UNKNOWN // UNKNOWN // 1 OF 1 // ORIGIN: APACHE SWD WELL NO 001 // ENDPOINT: APACHE FACILITY
	FLOWLINE REMOVAL // UNKNOWN // UNKNOWN // 1 OF 1 // ORIGIN: APACHE WELL NO 060 // ENDPOINT: APACHE FACILITY

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

CUP No.	Description
	FLOWLINE REMOVAL // UNKNOWN // UNKNOWN // 1 OF 1 // ORIGIN: APACHE WELL NO 062 // ENDPOINT: APACHE FACILITY
	SITE CLEARANCE SWD WELL NO 001
	SITE CLEARANCE WELL NO 060
	SITE CLEARANCE WELL NO 062
P20071549	BOAT SLIP REPAIR
P20071874	SOV - SITE CLEARANCE @ TANK BATTERY
P20080196	BOAT HOUSE AT 5725 DELACROIX
P20080283	DOCK FACILITY RECONSTRUCTION
P20080443	BENEFICIAL USE OF SPOIL
	CLEANOUT TO ACCESS LAC REAL ESTATE ET AL WELL #1
	LAC REAL ESTATE ET AL WELL #1
P20080726	GATE 6 - TOCA 2ND LOOP LINE - EXISTING // 26" // LOWERED TO 3' MIN BLW ML // LOWER LINE SEGMENT // ORIGIN: LAT. 29-42-00.91 / LONG. 89-45-51.97 // ENDPOINT: LAT. 29-39-10.06 / LONG. 89-45-56.67
	MAIN PASS-FRANKLINTON LINE - EXISTING // 20" // LOWERED TO 3' MIN BLW ML // LOWER LINE SEGMENT // ORIGIN: LAT. 29-42-11.28 / LONG. 89-45-56.69 // ENDPOINT: LAT. 29-41-56.62 / LONG. 89-45-48.99
	PIPELINE - EXISTING // 20" // LOWERED TO 3' MIN BLW MUDLINE // 20" GATE 6 - TOCA LOOP LINE // ORIGIN: X = 2498253; Y = 378985 // ENDPOINT: X = 2497640; Y = 380256
	PIPELINE - EXISTING // 20" // LOWERED TO 3' MIN BLW MUDLINE // 20" MAIN PASS-FRANKLINTON LINE // ORIGIN: X = 2498386; Y = 378758 // ENDPOINT: X = 2497681; Y = 380225
	PIPELINE - EXISTING // 26" // LOWERED TO 3' MIN BLW MUDLINE // 26" GATE 6 - TOCA 2ND LOOP LINE // ORIGIN: X = 2498115; Y = 379196 // ENDPOINT: X = 2497686; Y = 380107
P20081133	BOAT DOCK WITH 8 SLIPS
P20081224	BANK STABILIZATION
	HEATER PLATFORM & 100' WALKWAY
P20081563	REBUILD SWEETWATER BOAT PIER
P20090005	SERIGNE BOAT LAUNCH
P20090474	BOAT SHED AT 6201 DELACROIX HWY
P20090849	BOATHOUSE REPAIR AT 6428 DELECROIX HWY
P20091046	BAIT SHOP AT 6204 DELACROIX HWY
P20100470	BOAT SHED AT 6424 DELACROIX HWY
P20100705	WELL LOCATION: DELECROIX CORP LOC NO 1
	WHEELWASHING
P20101283	SWEETWATER BAIT SHOP & RIP RAP
P20120577	EXISTING PIPELINE // 3" // // 1 OF 2 HERE LINES TO REMOVE // ORIGIN: WINIFRED G SMITH NO 1/1D WELL // ENDPOINT: BARGE FACILITY
	EXISTING PIPELINE // 3" // // 2 OF 2 HERE LINES TO REMOVE // ORIGIN: WINIFRED G SMITH NO 1/1D WELL // ENDPOINT: BARGE FACILITY
	EXISTING PIPELINE // 4.5" // // LINE REMOVAL // ORIGIN: BARGE FACILITY // ENDPOINT: EXISTING TAP
	SWD FLOWLINE // 3" // // 1 OF 1 TO REMOVE // ORIGIN: WINIFRED G SMITH NO 2 SWD WELL // ENDPOINT: BARGE FACILITY

EXHIBIT D**Coastal Use Permits for Work in the Operational Area**

CUP No.	Description
	WELL PLATFORM REMOVAL: WINIFRED G SMITH NO 1/1D
	WELL PLATFORM REMOVAL: WINIFRED G SMITH NO 2 SWD
P20120665	EXISTING PIPELINE // 4.5" // // SOV - LINE SEGMENT REMOVAL // ORIGIN: 29°42'26"N 89°41'12"W // ENDPOINT: 29°42'25"N 89°41'13"W
	SOV - SITE CLEARANCE @ SWD WELL #2
	SOV - SITE CLEARANCE @ WELL NO 1/1D
P20130025	DOCK EXTENSION
P20130261	SOV - SITE CLEARANCE: DELACROIX WELL #1: SN 231343

EXHIBIT E

Map of Oil & Gas Wells within the Operational Area

Orange triangles indicate the surface locations of Oil & Gas Wells. *Source: LDNR*

2013 Aerial

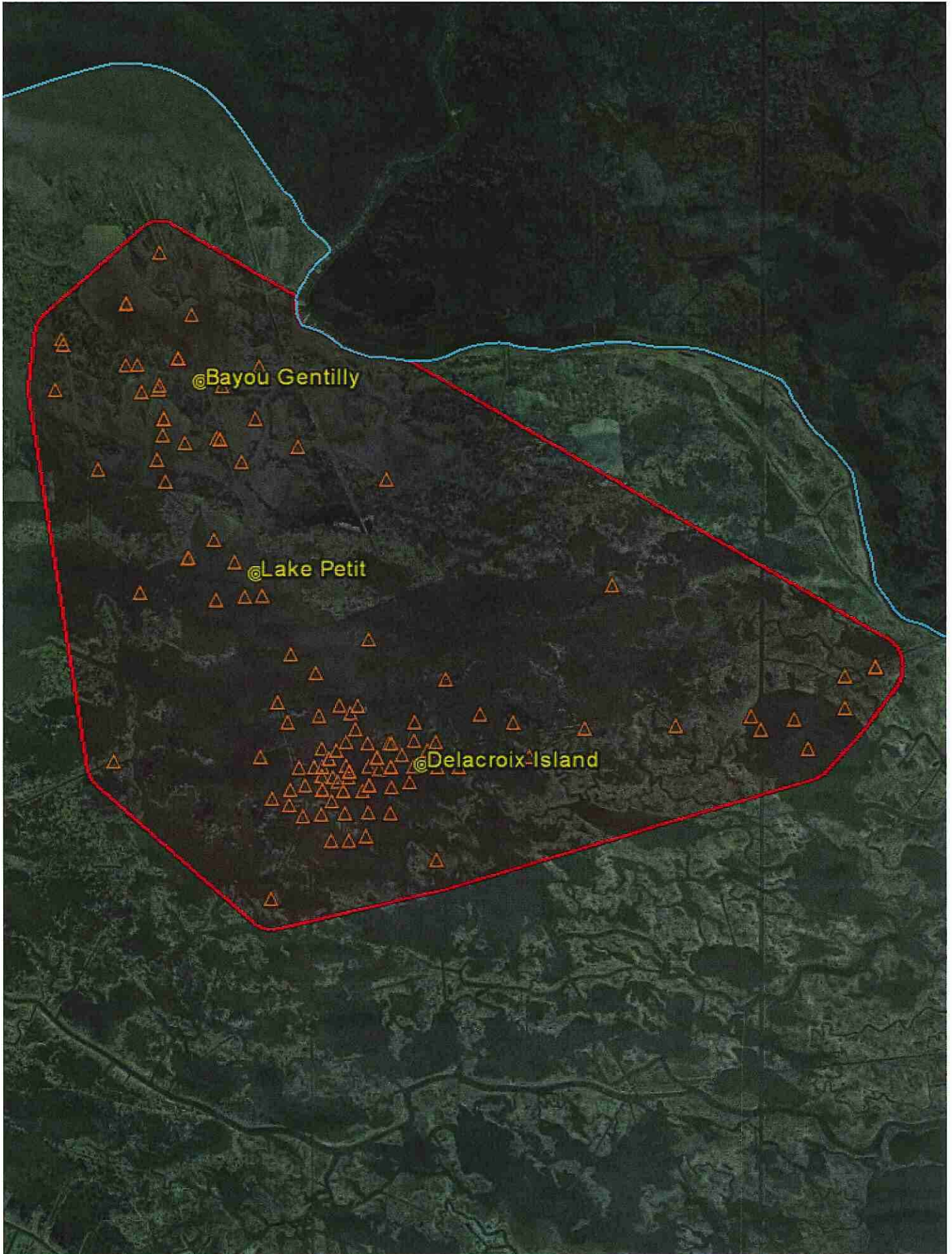


EXHIBIT F**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)****APACHE CORPORATION**

26018	56332	132392
28181	65862	133228
28656	69806	134146
29070	70438	134424
31357	76739	159022
32566	83253	161137
32996	112871	166337
33711	128313	211611
33848	129896	211612
39700	130441	211613
41103	131206	211744
41816	131207	
49161	132239	

ARCO O & G CO-DIV ATL RICH CO

115385	121138	123061
117676	122134	

CONOCO INC.

61259	63309	76595
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LA. LAND & EXPL. CO.

221523		
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LLOG EXPL. CO.

224688	225241	
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ROZEL OPERATING COMPANY

231343		
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TEXACO E & P INC.

26018	56332	132392
28181	65862	133228
28656	69806	134146
29070	70438	134424
31357	76739	159022
32566	83253	161137
32996	112871	166337
33711	128313	211611
33848	129896	211612
39700	130441	211613
41103	131206	211744
41816	131207	
49161	132239	

EXHIBIT F**Oil & Gas Wells Operated by Defendants and their Predecessors
within the Operational Area (by LDNR Well Serial No.)****TEXACO, INC.**

25284	42320	129896
26018	42423	130441
28160	42532	131206
28181	43755	131207
28656	43879	132239
28853	48879	132392
28969	49161	133228
29070	56332	133963
31357	65428	134146
32566	65802	134424
32996	65862	136611
33711	69806	138468
33848	70438	157165
34474	71755	159022
35249	73479	161137
36812	74442	166337
36943	76738	211611
37265	76739	211612
39700	77406	211613
41103	79142	211744
41508	83253	215633
41816	112871	
42059	128313	

THE CALIFORNIA COMPANY

35993	109827	
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THE TEXAS COMPANY

55945	57548	
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EXHIBIT G

Aerial Photographs of Pits within the Operational Area

(Pits Outlined in RED)

1979 Aerial

**T15S – R14E SEC. 34
T16S – R14E SEC. 3**

