

25TH JUDICIAL DISTRICT COURT FOR THE PARISH OF PLAQUEMINES

STATE OF LOUISIANA

DOCKET NO. 61-002

DIVISION "A"

THE PARISH OF PLAQUEMINES

VERSUS

TOTAL PETROCHEMICALS & REFINING USA, INC., BP AMERICA PRODUCTION COMPANY, BURLINGTON RESOURCES OIL & GAS COMPANY LP, CHEVRON U.S.A. INC., CLAYTON WILLIAMS ENERGY, INC., DELTA DEVELOPMENT COMPANY, INC., DEVON ENERGY PRODUCTION COMPANY, L.P., DIMENSION ENERGY COMPANY, L.L.C., PIONEER NATURAL RESOURCES USA, INC., JUNE ENERGY, INC., EXXON MOBIL CORPORATION, SHELL OFFSHORE INC., SHELL OIL COMPANY, CHEVRON U.S.A. HOLDINGS INC., TEXAS PETROLEUM INVESTMENT COMPANY, ANADARKO E&P ONSHORE, LLC, CHEVRON PIPELINE COMPANY, THE TEXAS COMPANY, AND LLOG EXPLORATION & PRODUCTION COMPANY, L.L.C.

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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**");

**TOTAL PETROCHEMICALS & REFINING USA, INC.** is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B, Baton Rouge, LA 70808. Total Petrochemicals & Refining USA, Inc. is named as successor in interest to **American Petrofina Company of Texas**;

**BP AMERICA PRODUCTION COMPANY** is a domestic corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B, Baton Rouge, LA 70808. BP America Production Company is named in its own capacity and as successor in interest to **Amoco Production Company**;

**BURLINGTON RESOURCES OIL & GAS COMPANY LP** is a foreign partnership whose registered agent, Corporation Service Company, is located at 320 Somerulos St., Baton Rouge, LA 70802;

**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 **Chevron Oil Company, The California Company and Gulf Oil Corporation**;

**CLAYTON WILLIAMS ENERGY, INC.** is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B, Baton Rouge, LA 70808;

**DELTA DEVELOPMENT COMPANY, INC.** is a domestic corporation, incorporated under the laws of Louisiana, and domiciled in Chalmette, Louisiana. Delta Development Company, Inc.'s registered agent, Debra A. Jarrell, is located at 9101 W. St. Bernard Hwy., Chalmette, LA 70043;

**DEVON ENERGY PRODUCTION COMPANY, L.P.** is a foreign limited partnership whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B. Devon Energy Production Company, L.P. is named in its own capacity and as successor in interest to **Devon Louisiana Corporation, Flores & Rucks, Inc., and Ocean Energy, Inc.**;

**DIMENSION ENERGY COMPANY, L.L.C.** is a domestic company organized under the laws of Louisiana whose member, David D. Daly, is domiciled in New Iberia, Louisiana, and whose registered agent, Richard W. Revels, Jr., Esq., is located at 822 Harding St., Lafayette, LA 70503;

**PIONEER NATURAL RESOURCES USA, INC.** is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B, Baton Rouge, LA 70808. Pioneer Natural Resources USA, Inc.

is named in its own capacity and as a successor in interest to **Greenhill Petroleum Corporation, Pioneer Natural Resources (GPC), Inc.;**

**JUNE ENERGY, INC.** is a domestic corporation, incorporated under the laws of Louisiana, and domiciled in Belle Chasse, Louisiana. June Energy, Inc.'s registered agent, Lana J. Hingle, is located at 8320 Sycamore Place, Belle Chasse, LA 70037;

**EXXON MOBIL CORPORATION** is a foreign corporation whose registered agent, Corporation Service Company, is located at 320 Somerulos St., Baton Rouge, LA 70802. Exxon Mobil Corporation is named as successor in interest to **The Superior Oil Company;**

**SHELL OFFSHORE INC.** is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B, Baton Rouge, LA 70808;

**SHELL OIL COMPANY** is a foreign corporation whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B, Baton Rouge, LA 70808;

**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.;**

**TEXAS PETROLEUM INVESTMENT COMPANY** is a foreign corporation whose registered agent, Patrick S. Ottinger, is located at 1313 W. Pinhook Rd., Lafayette, LA 70503;

**ANADARKO E&P ONSHORE, LLC** is a foreign company whose registered agent, C T Corporation System, is located at 5615 Corporate Blvd., Ste. 400B, Baton Rouge, LA 70808. Anadarko E&P Onshore, LLC is named as successor in interest to **Anadarko E&P Company LP and Union Pacific Resources Company;**

**CHEVRON PIPE LINE COMPANY** is a foreign corporation whose registered agent, The Prentice-Hall Corporation System, Inc., is located at 320 Somerulos St., Baton Rouge, LA 70802. Chevron Pipe Line Company is named as successor in interest to **Gulf Refining 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; 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 Coquille Bay, Delta Duck Club, Grand Bay, Main Pass Block 47, Main Pass Block 69, Raphael Pass, and Romere Pass 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;

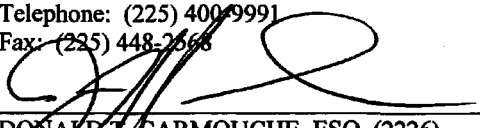
(b) Ordering the payment of costs necessary to clear, revegetate, detoxify and otherwise restore the Plaquemines Parish Coastal Zone as near as practicable to its original condition pursuant to LAC 43:I.705.N, 711.F and 719.M.

- (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) 448-2668



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JOHN H. CARMOUCHE, ESQ. (22294)  
WILLIAM R. COENEN, III, ESQ. (27410)  
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5213 Airline Drive  
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**PLEASE SERVE THE PETITION FOR DAMAGES:**

**TOTAL PETROCHEMICALS & REFINING USA, INC.**

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

**BP AMERICA PRODUCTION COMPANY**

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

**BURLINGTON RESOURCES OIL & GAS COMPANY LP**

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

**CLAYTON WILLIAMS ENERGY, INC.**

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

**DELTA DEVELOPMENT COMPANY, INC.**

Through its registered agent for service of process:  
Debra A. Jarrell  
9101 W. St. Bernard Hwy.  
Chalmette, LA 70043

**DEVON ENERGY PRODUCTION COMPANY, L.P.**

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

**DIMENSION ENERGY COMPANY, L.L.C.**

Through its registered agent for service of process:  
Richard W. Revels, Jr., Esq.  
822 Harding St.  
Lafayette, LA 70503

**PIONEER NATURAL RESOURCES USA, INC.**

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

**JUNE ENERGY, INC.**

Through its registered agent for service of process:  
Lana J. Hingle  
8320 Sycamore Place  
Belle Chasse, LA 70037

**EXXON MOBIL CORPORATION**

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

**SHELL OFFSHORE INC.**

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

**SHELL OIL COMPANY**

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

**TEXAS PETROLEUM INVESTMENT COMPANY**

Through its registered agent for service of process:  
Patrick S. Ottinger  
1313 W. Pinhook Rd.  
Lafayette, LA 70503

**ANADARKO E&P ONSHORE, LLC**

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

**CHEVRON PIPE LINE COMPANY**

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

**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



EXHIBIT A

Louisiana Coastal Zone Boundary



A-1

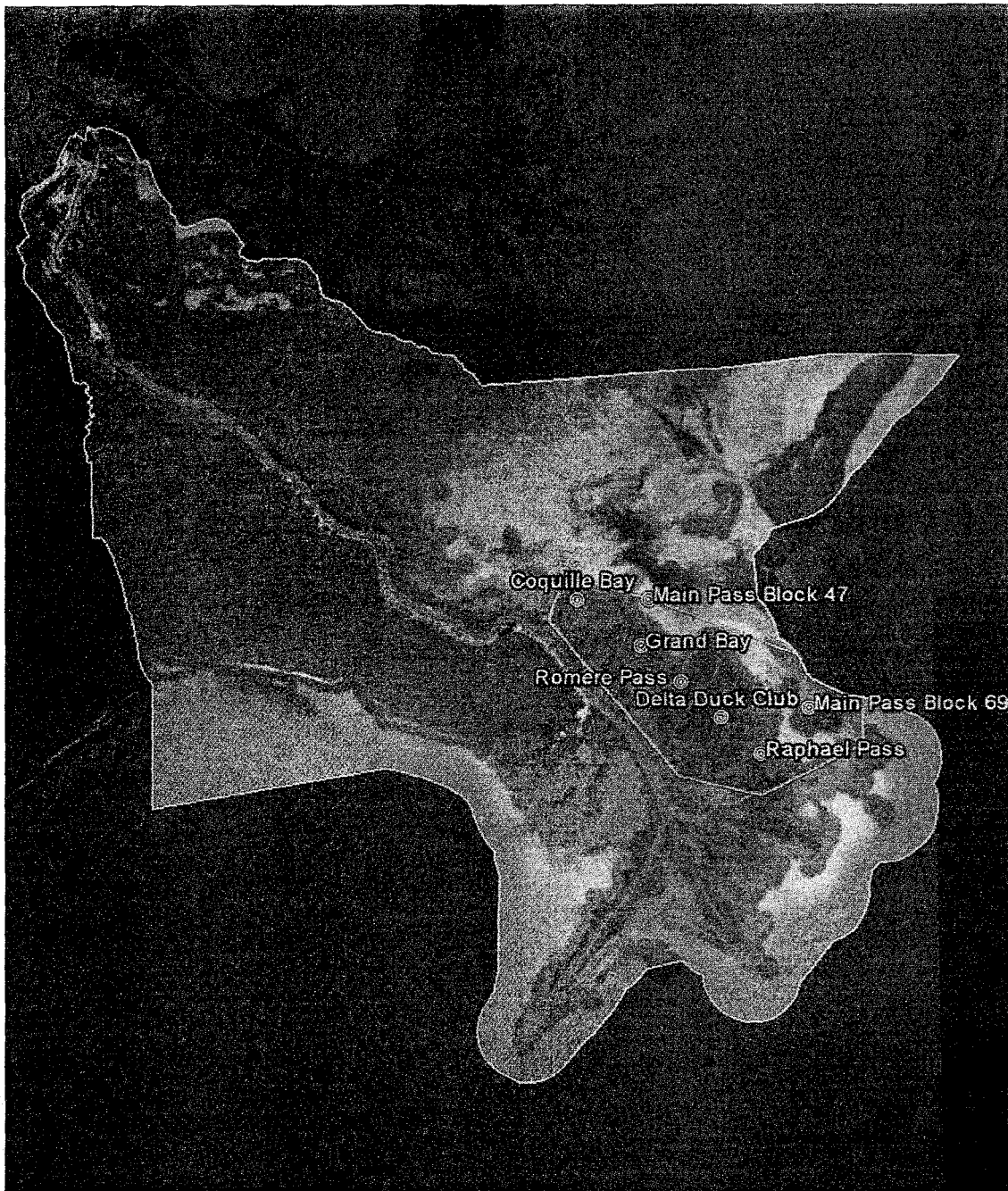
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NOV 08 2013  
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BY CLERK

Coquille Bay]

**EXHIBIT B**

**Map of the Operational Area**

(Overview)



**FILED**  
NOV 08 2013  
*[Handwritten Signature]*  
BY CLERK

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

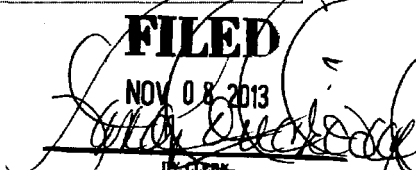


**FILED**  
NOV 08 2013  
*[Handwritten Signature]*  
BY CLERK

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

CUP No.	Description
P19800200	GAS // 3" GAS LIFT LINE // LAID ON MARSH // CHEVRON USA // ORIGIN: WELL#45 // ENDPOINT: TIE IN @ EXST GLL @ WELL #20
P19800235	FLOWLINE // 2.375" FLOWLINE // BURIED 3 FT MINIMUM // KERR-MCGEE CORP // ORIGIN: SL 1268 WELL # 10 // ENDPOINT: PRODUCTION PLATFORM # 47
P19800333	WATER INJECTION // 3" // UNSPECIFIED // // ORIGIN: SL 3508 WELL NO. 31 // ENDPOINT: SL 3508 WELL NO. 30
P19800334	FLOWLINE // 4" // UNSPECIFIED // // ORIGIN: SL 1353 WELL NO. 49 // ENDPOINT: PLATFORM "C"
P19800335	WATER // 4" WATER INJECTION FLOWLINE // // // ORIGIN: WELL NO 30 // ENDPOINT: WATER FLOOD PLATFORM
P19800336	FLOWLINE // 4" // UNSPECIFIED // // ORIGIN: S/L 3508 WELL#32 // ENDPOINT: PLATFORM "E"
P19800337	FLOWLINE // 4" // UNSPECIFIED // // ORIGIN: SL 1353 WELL NO. 48 // ENDPOINT: PLATFORM "C"
P19800338	FLOWLINE // 4" // UNSPECIFIED // // ORIGIN: SL 1353 WELL NO. 50 // ENDPOINT: PLATFORM "C"
P19800339	FLOWLINE // 4" FLOWLINE // // // ORIGIN: WELL NO 52 // ENDPOINT: PLATFORM "B"
P19800340	FLOWLINE // 4" FLOWLINE // // 1 OF 1 // ORIGIN: WELL NO 53 // ENDPOINT: PLATFORM "D"
	GAS // 2" GAS LIFT LINE // // 1 OF 1 // ORIGIN: WELL NO 53 // ENDPOINT: WELL NO 37
P19800341	FLOWLINE // 4" // UNSPECIFIED // REMOVAL BY P20120795 // ORIGIN: SL 1353 WELL NO. 51 // ENDPOINT: PLATFORM "C"
P19810690	GAS // 2.375" GAS FLOWLINE // LAID ON MARSH AND BURIED IN CANALS // DUPLICATE: KERR-MCGEE // ORIGIN: BLK 52 PLATFORM // ENDPOINT: TIE-IN
P19810955	FLOWLINE // 3" // UNSPECIFIED // // ORIGIN: SL 3508 WELL NO. 34 // ENDPOINT: PLATFORM "E"
P19810956	FLOWLINE // 3" // UNSPECIFIED // // ORIGIN: SL 3508 WELL NO. 33 // ENDPOINT: PLATFORM "E"
P19810957	WATER INJECTION LINE // 4" // 3' MIN BLW ML // // ORIGIN: SL 1357 WELL #18 // ENDPOINT: WATERFLOOD PLATFORM
P19811041	FLOWLINE // 3" // 3' MIN BLW ML // // ORIGIN: SL 1357 WELL #15 // ENDPOINT: PLATFORM "D"
P19811042	GAS LIFT LINE // 2" // N/A // // ORIGIN: SL 1357 WELL #15 // ENDPOINT: SL 1357 WELL #3
P19811088	GAS // 8" // 3' MIN BLW MUDLINE // // ORIGIN: SHELL OIL COMPANY PLATFORM 81-B // ENDPOINT: SHELL OIL COMPANY PLATFORM 40-JA
P19811651	SL 1359 NO. 2 WATERLINE
	WATERLINE // 4" SCHEDULE 80 WATERLINE // // // ORIGIN: // ENDPOINT:
P19811988	FLOWLINE // 3" // MUDLINE LEVEL // // ORIGIN: WELL 31 // ENDPOINT: "J" PLATFORM
P19820114	FLOWLINE // 4" // MUDLINE LEVEL/SELF-BURYING // CHEVRON LINE // ORIGIN: SL 2557 NO. 32 WELL // ENDPOINT: SL 2557 STRUCTURE "J"
P19820144	FLOWLINE // 4" // MUDLINE LEVEL/SELF-BURYING // CHEVRON LINE // ORIGIN: MAIN PASS AREA SL 3851 NO. 7 WELL // ENDPOINT: SL 2557 STRUCTURE "J"

D-1

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

CUP No.	Description
P19820589	// 3" FLOWLINE // BURIED 3 FT // // ORIGIN: // ENDPOINT:
P19820661	FLOWLINE // 3" // 3' MIN BLW MUDLINE // // ORIGIN: SL 1277 S.W.P.P. NO. 2 STRUCTURE // ENDPOINT: SL 1277 MAIN PASS BLOCK 69 FIELD NO. 9 WELL
P19821308	NATURAL GAS // 4.5" // 3' MIN BLW MUDLINE // // ORIGIN: SHELL MAIN PASS 69 "A" // ENDPOINT: TEXACO NORTH PASS FACILITIES
P19821694	GAS // 3" GAS LIFT LINE // BURIED 3 FT MINIMUM // // ORIGIN: // ENDPOINT:
P19830030	PLATFORMS AND WALKWAYS TO SERVE TANK BATTERY NO. 4
P19830238	INSTALL AND MAINTAIN DRILLING BARGE, PLATFORM, SHELLPAD, AND APPURTENANT STRUCTURES
P19830239	INSTALL AND MAINTAIN A DRILLING BARGE, PLATFORM, SHELL PAD, AND APPURTENANT STRUCTURES
P19830341	DREDGE TO DEEPEN AND MAINTAIN EXISTING POND, DREDGE SLIP TO ACCESS WELL LOCATION
P19830346	PROPOSED WELL SLIP, WALKWAYS, AND PLATFORMS
P19830352	DREDGE CANAL BOTTOM MATERIAL AND CONSTRUCT OIL AND GAS SLIP
P19830373	DREDGE A SLIP FOR OIL/GAS EXPLORATION
P19830387	OIL // 6.625" // 3' MIN BLW MUDLINE // // ORIGIN: PROPOSED "A" PLATFORM BLOCK 64 MAIN PASS AREA // ENDPOINT: TIE-IN TO CAL-KY PIPELINE
P19830439	DREDGE AND MAINTAIN A CANAL AND SLIP FOR ACCESS TO A WELL LOCATION, INSTALL DRILLING BARGE, PLATFORM, APPURTENANT STRUCTURES
P19831176	SHELL PAD
P19831205	DREDGE CHANNEL
P19831765	DREDGE AND MAINTAIN A SLIP AS AN EXTENSION TO AN EXISTING CANAL FOR WELL LOCATION
P19831766	SLIP, WALKWAYS, PLATFORMS, UNIT 1 WELL NO. 6
P19840135	GAS // 3.5" FLOWLINE // LAID ON SURFACE & BURIED 3 FT BELOW CANALS // TEXACO USA // ORIGIN: SUPERIOR S.L. 335A # 1-3 // ENDPOINT: EXISTING TANK BATTERY
	PIPELINES, S.L. 335 A UNIT NO. 3,4,5,6,
P19840709	GAS // 3.5" FLOWLINE // ON MARSH / BURIED 3 FT @ CANAL XING // GULF OIL CORPORATION // ORIGIN: PROPOSED GAS LIFT MANIFOLD // ENDPOINT: EXISTING GAS LIFT MANIFOLD
	GAS // 3.5" FLOWLINE // ON MARSH / BURIED 3 FT @ CANAL XING // GULF OIL CORPORATION // ORIGIN: PROPOSED GAS LIFT MANIFOLD // ENDPOINT: WELL (#153?)
P19840748	PLATFORMS TO SERVE TANK BATTERY NO. 3
P19840802	FLOWLINE // FLOWLINE // // 1OF2: TEXACO USA // ORIGIN: SUPERIOR B-1 // ENDPOINT: PROPOSED PLATFORM
P19841097	GAS // 2.875" FLOWLINE // BURIED 10 FT BELOW MUDLINE // GULF OIL CORPORATION // ORIGIN: WELL NO 190 // ENDPOINT: TIE IN ON EXISTING 2 7/8" GAS LINE
	OIL // 3.5" FLOWLINE // BURIED 10 FT BELOW MUDLINE // GULF OIL CORPORATION // ORIGIN: WELL NO 190 // ENDPOINT: TIE IN ON EXISTING 3" OIL LINE
P19841260	DRILLING BARGE AT A DRILL SITE AND CONSTRUCT A WELL PROTECTION STRUCTURE

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

CUP No.	Description
P19841517	AFTER-THE -FACT PERMIT, DREDGE, REPLACE OIL PIPELINE
P19850045	GAS // 2 7/8" GAS // LAID ON SURFACE & BURIED 3 FT // GULF OIL *SEE #P851275 REVISION // ORIGIN: S/L 195 WELL#21 // ENDPOINT: S/L 195 WELL#9
P19850107	SL 335 DDC UNIT 1 WELL #7
P19850161	EXCAVATE CONSTRUCT LONG OIL AND GAS CHANNEL; GRAND BAY
P19850226	// 3" FLOWLINE // 3' MIN BLW ML // CHEVRON USA // ORIGIN: WELL NO 19 // ENDPOINT: NO 1 TANK BATTERY
	GAS // 2" GAS LIFT LINE // 3' MIN BLW ML // CHEVRON USA // ORIGIN: WELL NO 19 // ENDPOINT: TIE IN @ EXISTING BULK LINE
P19850420	PLATFORMS AND FLOWLINES WELL NO49 GRAND PRARIE LEVEE DISTRICT A LEASE, GRAND BAY FIELD SEC 6.
P19850573	CONSTRUCT ACCESS CANAL, INSTALL 5 DAY BOARDS
P19850686	GAS // 3.5" PIPELINE // // 2OF3: TEXACO USA N.O. OPERATIONS DIVISION // ORIGIN: SUPERIOR WELL 4-3 (B-2) // ENDPOINT: PROPOSED PLATFORM
	OIL // 2 7/8" PIPELINE // // 1OF3: TEXACO USA N.O. OPERATIONS DIVISION // ORIGIN: SUPERIOR WELL 4-3 (B-2) // ENDPOINT: PROPOSED PLATFORM
	OIL // 2 7/8" PIPELINE // // 3OF3: TEXACO USA N.O. OPERATIONS DIVISION // ORIGIN: SUPERIOR WELL 4-3 (B-2) // ENDPOINT: PROPOSED PLATFORM
	PROPOSED FACILITIES AND PIPELINES TO SERVE SUPERIOR WELL VUD : DDC B #2
P19850687	OIL/GAS CANAL/SLIP. MAIN PASS BLOCK 49
P19850689	DREDGE CANAL IN MAIN PASS BLOCK 67
P19850690	INSTALL AND MAINTAIN DRILLING BARGE, PLATFORM
P19850730	OIL // 4" OIL // BURIED BY BACKFILL, 8' BELOW M/L CANAL X // WELL #21 TO WELL #78 GRAND BAYOU FIELD, CHEVRON // ORIGIN: // ENDPOINT:
	OIL // 4" OIL FLOWLINE // LAID ON SURFACE & BURIED 3 FT // REVISED FLOWLINE SIZES: GULF OIL EXPLOR & PROD CO // ORIGIN: WELL # 21 // ENDPOINT: TANK BATTERY NO 12
P19850939	FLOWLINE // 6" FLOWLINE // 3' MIN BELOW MUDLINE // PRODUCTION PLAT. TO PRODUCTION PLATFORM // ORIGIN: // ENDPOINT:
P19851275	GAS // 3" GAS // LAID ON SURFACE, BURED 3 FT // CHEVRON *SEE P850045(P/L CHANGE TO 3", TIEIN @ WELL#9) // ORIGIN: S/L 195 WELL#21 // ENDPOINT: S/L 195 WELL#9
	GAS // 3" GAS LIFT LINE // LAID ON SURFACE & BURIED 3 FT // CHEVRON *SEE P850045(P/L CHANGE TO 3", TIEIN @ P851275) // ORIGIN: S/L195 WELL#9 (P850045 TIES IN HERE FROM WELL#21) // ENDPOINT: S/L 195 GAS LIFT MANIFOLD #1
P19851421	EXCAVATE TO CONSTRUCT FOUR CUTS
P19851562	EXCAVATE TO ACCESS OIL AND GAS DRILL SITE
P19851619	GAS // 3" GAS LIFT LINE // LAID ON MARSH & 3' BLW ML @ CANAL XING // CHEVRON // ORIGIN: WELL # 153-A // ENDPOINT: GAS LIFT MANIFOLD # 11

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

CUP No	Description
	GAS // 3" GAS LIFT LINE // LAID ON MARSH & 3' BLW ML @ CANAL XING // CHEVRON // ORIGIN: WELL # 167-A // ENDPOINT: GAS LIFT MANIFOLD # 11
	GAS // 3" GAS LIFT LINE // LAID ON MARSH & 3' BLW ML @ CANAL XING // CHEVRON // ORIGIN: WELL # 74-A // ENDPOINT: GAS LIFT MANIFOLD # 12
	GAS // 3" GAS LIFT LINE // LAID ON MARSH & 3' BLW ML @ CANAL XING // CHEVRON // ORIGIN: WELL #64-A // ENDPOINT: GAS LIFT MANIFOLD # 11
	GAS // 3" GAS LIFT LINE // SURFACE OF MARSH, 6' BLW CANAL X // CHEVRON // ORIGIN: WELL # 102-A // ENDPOINT: GAS LIFT MANIFOLD # 12
	GAS // 3" GAS LIFT LINE // SURFACE OF MARSH, 6' BLW CANAL X // CHEVRON // ORIGIN: WELL # 139-A // ENDPOINT: GAS LIFT MANIFOLD # 12
	GAS // 3" GAS LIFT LINE // SURFACE OF MARSH, 6' BLW CANAL X // CHEVRON // ORIGIN: WELL # 149-A // ENDPOINT: GAS LIFT MANIFOLD # 12
	GAS // 3" GAS LIFT LINE // SURFACE OF MARSH, 6' BLW CANAL X // CHEVRON // ORIGIN: WELL # 158-A // ENDPOINT: GAS LIFT MANIFOLD # 12
	GAS // 3" GAS LIFT LINE // SURFACE OF MARSH, 6' BLW CANAL X // CHEVRON // ORIGIN: WELL # 85-A // ENDPOINT: GAS LIFT MANIFOLD # 12
P19860083	ACCESS TO PROPOSED OIL/GAS SLIP
P19860084	DREDGING
P19860143	REPLACEMENT PIPELINE // 8" REPLACEMENT OF 2 - 12" PIPELINE // UNDER MISSISSIPPI RIVER // LINE ABANDONED BY P20070381 // ORIGIN: BASTIAN BAY LINE // ENDPOINT: OLGA COMPRESSOR STATION
P19860173	GAS // 2" GAS LIFT LINE // 3' MIN BLW ML // CHEVRON USA INC // ORIGIN: I. R. PRICE WELL NO 25 // ENDPOINT: WELL NO 1
	GAS // 2" GAS LIFT LINE // 3' MIN BLW ML // CHEVRON USA INC // ORIGIN: TANK BATTERY NO 1 // ENDPOINT: WELL NO 1
	INSTALL AND MAINTAIN GAS LIFT LINES AND OIL FLOWLINE
	OIL // 3" FLOWLINE // 3' MIN BLW ML // CHEVRON USA // ORIGIN: WELL NO 1 // ENDPOINT: TIE-IN POINT @ EXISTING LINE
P19860200	OIL AND OR GAS // 6" OIL AND OR GAS PIPELINE // BURIED 3 FT BELOW MUDLINE // QUINTANA PETRO CORP. LINE FROM WELL 2 TO PROD. FACILITY // ORIGIN: // ENDPOINT:
	OIL AND OR GAS // 8" OIL AND OR GAS PIPELINE // BURIED 3 FT BELOW MUDLINE // QUINTANA PETRO CORP. LINE FROM WELL 2 TO PROD. FACILITY // ORIGIN: // ENDPOINT:
P19860207	PROPOSED PRODUCTION FACILITIES TO SERVE SUPERIOR WELL
P19860225	FLOWLINES AND PRODUCTION FACILITIES TO SUPERIOR WELL NO. 0-1
P19860269	DREDGE CHANNEL & SLIP TO ACCESS WELL SITE
P19860328	MAINTENANCE AND INSTALLATION OF FLOWLINE FROM TANK BATTERY #1 TO WELL #145A
P19860553	CONSTRUCT A SHELL MAT: MAIN PASS 41 TERMINAL



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

CUP No.	Description
P19860642	GAS // 2 7/8" PIPELINE // 3' MIN BLW ML // 2OF3: NEW ORLEANS OPERATIONS DIVISION // ORIGIN: STRUCTURES // ENDPOINT: STRUCTURES
	OIL // 2 7/8" PIPELINE // 3' MIN BLW ML // 1OF3: NEW ORLEANS OPERATIONS DIVISION // ORIGIN: STRUCTURES // ENDPOINT: STRUCTURES
	OIL // 2 7/8" PIPELINE // 3' MIN BLW ML // 3OF3: NEW ORLEANS OPERATIONS DIVISION // ORIGIN: STRUCTURES // ENDPOINT: STRUCTURES
P19860667	INSTALL AND MAINTAIN PILE CLUSTERS OLGA COMPRESSION STATION
P19860735	SHELL PAD TO MAINTAIN A DRILLING BARGE AND APPURTENANT STRUCTURES FOR OIL/GAS PRODUCTION
P19860736	EXCAVATE OPEN WATER TO PREPARE A SITE TO EXPLORE FOR OIL AND GAS, ACCESS CANAL AND SLIP
P19860936	INSTALL A SHELL PAD TO SUPPORT A SUBMERSIBLE BARGE WORKOVER RIG SL 1355 NO. 6
P19860937	INSTALL A SHELL PAD TO SUPPORT A SUBMERSIBLE BARGE WORKOVER RIG SL 1961 NO. 54
P19860943	INSTALL A SHELL PAD TO SUPPORT A SUBMERSIBLE BARGE WORKOVER RIG, SL 1355 NO. 40
P19860944	EXCAVATE FOR OIL/GAS EXPLORATION
P19870153	PLACE FILL TO CONSTRUCT AND MAINTAIN A SHELL PAD TO SERVE SL 1355, WELL NO. 5
P19870206	BOAT DOCK TO SERVE COMPRESSOR STATION IN DELTA DUCK CLUB
P19870223	MAINTENANCE DREDGING OF CANALS AND CHANNELS
P19870224	MAINTENANCE DREDGING TO SERVE STATE LEASE 335 UNIT 1 WELL NO, 109 AND 110
P19870325	PLATFORM TO SERVE DELTA DUCK CLUB FIELD
P19870371	CANALS AND CHANNELS WILL BE MAINTAINED FOR ACCESS WELL LOCATIONS
P19870372	MAINTENANCE OF OIL/GAS CHANNELS
P19870499	INSTALL AND MAINTAIN A SHELL PAD FOR SL 1355 WELL NO. 30
P19870567	CONSTRUCT, MAINTAIN, OPERATE, AND REMOVE STRUCTURES AND APPURTENANCES REQUIRED FOR OIL,GAS. CHEVRON
P19870569	// 2 1/2" FLOWLINE // 3' MIN BLW ML; 8' BLW ML IN DITCH // // ORIGIN: I.R.PRICE ET AL NO 28 // ENDPOINT: TANK BATTERY NO 1
	INSTALL AND MAINTAIN FLOWLINE FROM PRICE ET AL. WELL NO. 28 TO NO. 1 TANK BATTERY
P19870579	GAS FLOWLINE AND CONDENSATE FLOWLINE AND LINE HEATER. PRICE ET AL. NO. 12 TO NO. 1
P19870580	INSTALL AND MAINTAIN FLOWLINE FROM CHEVRON PRICE ET AL WELL NO. 25
P19870589	EXCAVATE TO DEEPEN CANAL
P19870590	INSTALL HEATER PLATFORM AND WALKWAY, WELL PROTECTION STRUCTURE, FLOWLINE, GAS LIFT LINE,
P19870647	MAINTENANCE DREDGING
P19870651	TRANSPORT DRILLING RIG

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

CUP No	Description
P19870736	CRUDE OIL // 2.875" OIL FLOWLINE // LAID ON MARSH & BURIED 3 FT AT WATER // TEXACO LINE FROM TANK BATTERY TO MANIFOLD RISER // ORIGIN: // ENDPOINT:
	CRUDE OIL // 2.875" OIL FLOWLINE // LAID ON MARSH & BURIED 3 FT AT WATER // TEXACO LINE FROM WELL 29 TO TANK BATTERY // ORIGIN: // ENDPOINT:
	CRUDE OIL // 2.875" OIL FLOWLINE // LAID ON MARSH & BURIED 3 FT AT WATER // TEXACO LINE FROM WELL 29 TO TANK BATTERY // ORIGIN: WELL 29 // ENDPOINT: TANK BATTERY
	DRILLING STRUCTURES AND PIPELINE TO SERVE SL 335
	NATURAL GAS // 2.875" GAS LIFT LINE // LAID ON MARSH & BURIED 3 FT AT WATER // TEXACO LINE FROM TANK BATTERY TO MANIFOLD RISER // ORIGIN: // ENDPOINT:
	NATURAL GAS // 3.5" GAS FLOWLINE // LAID ON MARSH & BURIED 3 FT AT WATER // TEXACO LINE FROM TANK BATTERY TO MANIFOLD RISER // ORIGIN: // ENDPOINT:
	NATURAL GAS // 3.5" GAS FLOWLINE // LAID ON MARSH & BURIED 3 FT AT WATER // TEXACO LINE FROM WELL 29 TO TANK BATTERY // ORIGIN: // ENDPOINT:
P19870859	FLOWLINE // 2.5" FLOWLINE // LAID ON SPOIL BANK, 3' MIN IN CANAL // (1OF3) S/L 2792 WELL#12 TO TIE-IN // ORIGIN: // ENDPOINT:
	FLOWLINE // 2.5" FLOWLINE // LAID ON SPOIL BANK, 3' MIN IN CANAL // (2OF3) S/L 2792 WELL#12 TO TIE-IN // ORIGIN: // ENDPOINT:
	FLOWLINE // 2.5" FLOWLINE // LAID ON SPOIL BANK, 3' MIN IN CANAL // (3OF3) S/L 2792 WELL#12 TO TIE-IN // ORIGIN: // ENDPOINT:
	FLOWLINES
P19870864	DREDGE SLIP FOR TWO WELL SITES
P19871044	CONSTRUCT CREVASSE AS MITIGATION
P19871140	PROPOSED DREDGING & SHELL MAT FOR GENERATOR BARGE
P19871156	DREDGE CANAL TO INSTALL AND MAINTAIN DRILLING BARGE, PLATFORM, AND APPURTENANT STRUCTURES
P19871246	GAS // 2 7/8" GAS LIFT LINE // LAID ON MARSH & 3' MIN BLW CANAL // 2OF2: TEXACO USA // ORIGIN: EXISTING TANK BATTERY // ENDPOINT: PROPOSED WELL NO 107
	PROPOSED DREDGING, DRILLING, LINE HEATER AND PIPELINES TO SERVE SL 335 UNIT 1 WELL NO. 107
P19871281	CONDENSATE // 2" CONDENSATE // // LINE HEATER PLTFRM TO GRAND BAY TNK BAT#2, CHEVRON // ORIGIN: // ENDPOINT:
	GAS // 3" GAS // // LINE HEATER PLTFRM TO 6" HIGH PRESSURE TIEIN, CHEVRON // ORIGIN: // ENDPOINT:
P19880085	GAS // 3" GAS LIFT LINE // // CHEVRON USA INC // ORIGIN: UNOT NO 44 // ENDPOINT: UNIT NO 45
P19880179	// 2.5" FLOWLINE // LAID ON EXISTING SPOIL BANKS // (1 OF POSSIBLE 2) SL2792 WELL #13 TO TIE IN, RAMCO OIL // ORIGIN: // ENDPOINT:
	// 2.5" FLOWLINE // LAID ON EXISTING SPOIL BANKS // (1 OF POSSIBLE 2) SL2792 WELL #14 TO TIE IN, RAMCO OIL // ORIGIN: // ENDPOINT:
	DREDGE SLIP, INSTALL DRILLING BARGE
P19880180	PROPOSED DRILLSITE AND STRUCTURES
P19880202	INSTALL AND MAINTAIN A RISER/RECEIVER ACCESS PLATFORM

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

CUP No.	Description
P19880319	DREDGE
P19880369	MAINTENANCE DREDGING WITHING EXISTING CANAL FOR NEW WELL SLIP AND ACCESS TO WELL GPLD "A"
P19880451	CONDENSATE // 6.625" // 3' BLW MUDLINE // // ORIGIN: PROPOSED PELTO PLATFORM BLOCK 68 MAIN PASS AREA // ENDPOINT: TIE-IN TO 16" SONAT PIPELINE
	GAS // 2.875" // 3' BLW MUDLINE // // ORIGIN: PROPOSED PELTO PLATFORM BLOCK 68 MAIN PASS AREA // ENDPOINT: PROPOSED TIE-IN TO 6" CHEVRON PIPELINE
	INSTALL NATURAL GAS PIPELINE
P19880523	DREDGE CHANNEL/SLIP IN SHALLOW OPEN WATER FOR A DRILL SITE
P19880665	MAINTENANCE DREDGING CHEVRON
P19880838	DREDGE WATERBOTTOM TO CONSTRUCT A SLIP TO ACCESS PIPELINE PLATFORM. REMOVE SEPARATOR, TANK, AND VALVES AND PIPING.
P19880853	GAS // 2.875" // 3' MIN BLW MUDLINE // // ORIGIN: PELTO SL NO. 1277 WELL NO. 26 BLOCK 68 // ENDPOINT: PROPOSED PELTO PRODUCTION PLATFORM SL 10745 WELL NO. 1
P19880869	INSTALL AND MAINTAIN SHELL PADS FOR SL 1355 WELL NO. 17, 22, 23, 25, 28A, 30, AND 35.
P19880881	INSTALL AND MAINTAIN A SHELL PAD FOR SL 1353 WELL NO. 7
P19881098	FLOWLINE // 3" FLOWLINE // BURIED 3 FT // SL11189 WELL#5 TO SL11185 WELL#2, QUINTANA PETROLEUM // ORIGIN: // ENDPOINT:
P19890052	PLATFORM, WALKWAY, PILE CLUSTERS. RAMCO OIL AND GAS INC.
P19890068	INSTALL AND MAINTAIN SHELL PAD FOR SL 1355 WELL NO. 12
P19890178	OIL/GAS // 2 3/8" OIL/GAS // LAID ON BOTTOM, 3' BLW MUDLINE LAST 200' // S/L 1272 WELL#16 TO MAIN PASS 52-A PLTFRM, ROSEWOOD // ORIGIN: // ENDPOINT:
P19890275	MAINTENANCE DREDGE TO MAINTAIN CHANNEL/SLIP
P19890328	CONSTRUCT WELL PROTECTION STRUCTURE TO DRILL SL 13383 WELL NO. 1
P19890329	NOT FOUND
P19890341	INSTALL AND MAINTAIN SHELL PADS FOR SL 998 WELL NO. 1, 6, SL 1355 WELL NO. 11
P19890441	INSTALL AND MAINTAIN SHELL PADS IN SL 1355 TO DRILL WELL NO. 4 AND 6
P19890447	FLOWLINE // 2" FLOWLINE // LAID ON MUDLINE // // ORIGIN: WELL #3, #4, #12, #25, #28 // ENDPOINT: TANK BATTERY NO 1
	FLOWLINE // 2" FLOWLINE // LAID ON MUDLINE // LAUREL OPERATING // ORIGIN: WELL # 5 // ENDPOINT: TB#1
	FLOWLINE // 2" FLOWLINE // LAID ON MUDLINE // LAUREL OPERATING // ORIGIN: WELL # 9 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // // ORIGIN: WELL # 12 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // // ORIGIN: WELL # 28 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // (1OF2) WELL#5 TO TANK BATTERY#1 // ORIGIN: WELL # 5 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // (2OF2) WELL#5 TO TANK BATTERY#1 // ORIGIN: WELL # 5 // ENDPOINT: TB#1

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

CUP No.	Description
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // 1OF2 // ORIGIN: WELL # 25 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // 1OF2 // ORIGIN: WELL # 3 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // 2OF2 // ORIGIN: WELL # 25 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // 2OF2 // ORIGIN: WELL # 26 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // 2OF2 // ORIGIN: WELL # 3 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // LAUREL OPERATING // ORIGIN: WELL # 14 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // LAUREL OPERATING // ORIGIN: WELL # 29 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // LAUREL OPERATING // ORIGIN: WELL # 4 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // LAUREL OPERATING // ORIGIN: WELL # 6 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // LAUREL OPERATING // ORIGIN: WELL # 9 // ENDPOINT: TANK BATTERY NO 1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // LAUREL OPERATING CO // ORIGIN: WELL # 1 // ENDPOINT: TB#1
	FLOWLINE // 3" FLOWLINE // LAID ON MUDLINE // WELL#27 TO TANK BATTERY#1, LAUREL OPERATING // ORIGIN: WELL # 27 // ENDPOINT: TB#1
	MAINTAIN FLOWLINES, KEYWAYS AND LINE HEATER PLATFORMS
P19890516	INSTALL AND MAINTAIN SHELL PAD SL 988 WELL NO. 4
P19890531	CRUDE OIL // 16" PIPELINE // // SHELL PIPE LINE CORP // ORIGIN: TEST LEAD MP15.9 // ENDPOINT: ABOVE GROUND JUNCTION BOX
P19890594	DREDGE CANAL.SLIP AND LAY PIPELINES
	FLOWLINE // 2.5" FLOWLINE // SURFACE OF SOIL, BURIED AT X // (1OF2) S/L2792 WELL#17 TO PLTFRM // ORIGIN: // ENDPOINT:
	FLOWLINE // 2.5" FLOWLINE // SURFACE OF SOIL, BURIED AT X // (2OF2) S/L2792 WELL#17 TO PLTFRM // ORIGIN: // ENDPOINT:
P19890595	DREDGE CANAL/SLIP, LAY PIPELINE, BACKFILL
	FLOWLINE // 2.5" FLOWLINE // SURFACE OF BANKS, 4' BLW M/L @ X // (1OF2) S/L 2792 WELL#16 TO PLATFORM // ORIGIN: // ENDPOINT:
	FLOWLINE // 2.5" FLOWLINE // SURFACE OF BANKS, 4' BLW M/L @ X // (2OF2) S/L 2792 WELL#16 TO PLATFORM // ORIGIN: // ENDPOINT:
P19890596	DREDGE SLIP FOR A DRILL SITE AND LAY PIPELINES, BACKFILL
	FLOWLINE // 2.5" FLOWLINE // SURFACE OF BANKS, 4' BLW M/L @ X // (1OF2) S/L 2792 WELL#15 TO PLATFORM // ORIGIN: // ENDPOINT:
	FLOWLINE // 2.5" FLOWLINE // SURFACE OF BANKS, 4' BLW M/L @ X // (2OF2) S/L 2792 WELL#15 TO PLATFORM // ORIGIN: // ENDPOINT:
P19890664	MAINTENANCE DREDGE TO ACCESS CHANNEL AND COMPRESSOR STATION
P19891021	PROPOSAL TO INSTALL AND MAINTAIN CONVRETE FLARE SCRUBBER PLATFORM AND PILE CONCRETE FOUNDATION AT TANK BATTERY NO. 1
P19891119	DRILLING ACTIVITIES FOR SL 13633 WELL NO. 1

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

<b>CUP No.</b>	<b>Description</b>
P19900005	DRILL WELLS AND INSTALL WELL PROTECTORS PRICE NO. 1, 2, 3,
P19900017	DEPOSIT SHELL TO CONSTRUCT FOOT PAD
P19900030	EXCAVATE WATER BOTTOM MATERIAL TO PREPARE LOCATION FOR DEPOSITION OF SHELL TO CONSTRUCT SHELL MAT
P19900033	PROPOSED PLATFORM
P19900063	// 3" FLOWLINE // 3' BELOW NATURAL BOTTOM OF BAY // COQUILLE BAY // ORIGIN: WELL LOCATION "A" // ENDPOINT: TANK BATTERY NO. 1
	DRILLING BARGE, WELL PROTECTION STRUCTURE, FLOWLINE WELL "A".
P19900064	// 3" FLOWLINE // 3' BELOW NATURAL BOTTOM OF BAY // COQUILLE BAY // ORIGIN: WELL LOCATION "B" // ENDPOINT: TANK BATTERY NO. 1
	DRILLING BARGE, WELL PROTECTION STRUCTURES, FLOWLINE. COQUILLE BAY FIELD WELL "B".
P19900066	DREDGE AND MAINTAIN A CANAL , DRILLING BARGE, WELL HEAD, WELL PROTECTOR, FLOWLINES, APPURTENANT STRUCTURES
	GAS // 3" PIPELINE // 3' BLW MARSH SURFACE AND WATER BTM. // THE TERMO CO. SEC. 35, DELTA DUCK CLUB FIELD // ORIGIN: DELTA DUCK CLUB WELL NO. 1 // ENDPOINT: CHEVRON ROMERE PASS FACILITY
P19900082	STATE LEASE 13383 WELL NO. 1
P19900083	STATE LEASE 13670 WELL NO. 1, MAIN PASS BLOCK 50
P19900108	PROPOSED STRUCTURES SL 195
P19900109	PROPOSED STRUCTURES SL 195 QQ19
P19900126	PROPOSED PIPELINES
P19900169	// 3" FLOWLINE // 3' MINIMUM BELOW MUDLINE // LAUREL OPERATING CO. INC. COQUILLE BAY FIELD // ORIGIN: I.R PRICE, ET AL NO. 31 WELL // ENDPOINT: LAUREL OPERATING CO. INC. TANK BATTERY NO. 1
	OIL AND GAS WELL FLOWLINE PRICE NO. 31 WELL
P19900170	// 3" FLOWLINE // 3' MINIMUM BELOW MUDLINE // 1OF2: COQUILLE BAY FIELD // ORIGIN: PROPOSED WELL LOCATION "E" // ENDPOINT: LAUREL TANK BATTERY NO. 1
	// 3" FLOWLINE // 3' MINIMUM BELOW MUDLINE // 2OF2: COQUILLE BAY FIELD // ORIGIN: PROPOSED WELL LOCATION "E" // ENDPOINT: LAUREL TANK BATTERY NO. 1
	OIL AND GAS WELL FLOWLINE. LAUREL OPERATION CO. WELL "E"
P19900171	// 3" FLOWLINE // 3' MINIMUM BELOW MUDLINE // COQUILLE BAY FIELD // ORIGIN: PROPOSED WELL LOCATION "C" // ENDPOINT: LAUREL OPERATING CO. INC. TANK BATTERY NO. 1
	// 3" FLOWLINE // 3' MINIMUM BELOW MUDLINE // LAUREL OPERATING CO. INC. COQUILLE BAY FIELD // ORIGIN: PROPOSED WELL LOCATION "C" // ENDPOINT: LAUREL OPERATING CO. INC. TANK BATTERY NO. 1
	OIL AND GAS WELL AND FLOWLINE. COQUILLE BAY FIELD WELL "C"
P19900176	WELL PROTECTION STR FOR STATE LEASE 13383 WELL #2
P19900247	INSTALL AND MAINTAIN TWO PLATFORMS, A DECK DRAINAGE SUMP PLATFORM, AND A PORTABLE WATER BANK PLATFORM, AT A COMPRESSOR, STATION LOCATION

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

CUP No.	Description
P19900276	MAINTENANCE DREDGING OF EXISTING CANAL/SLIP TO MAINTAIN ACCESS TO EXISTING WELL SITE
P19900309	SL 195 "QQ" 23 WELL GREENHILL PETROLEUM CORP.
P19900340	CLEAN OUT EXISITNG SLIP AREA TO ACCESS WELL, SL 195 QQ11 WELL
P19900351	INSTALL A SHELL PAD AND STRUCTURES TO DRILL SL 195 "QQ" 195 WELL
P19900363	INSTALL AND MAINTAIN SHELL PAD AND APPURTENANT STRUCTURES TO DRILL AND PRODUCE GRAND PRAIRIE LEVEE DISTRICT "A" NO. 174 WELL
P19900425	INSTALL SHELL PAD AND APPURTENANT STRUCTURES TO DRILL AND PRODUCT GRAND PRAIRIE LEVEE DISTRICT "A" 173 WELL
P19900426	CONSTRUCT A SHELL PAD FOR A DRILL SITE SL 335 DP #9 WELL
P19900441	// 3" FLOWLINE // 3' MINIMUM BELOW BAY BOTTOM // LAUREL OPERATING COMPANY, INC. COQUILLE BAY FIELD // ORIGIN: LAUREL OPER. CO. INC. COQUILLE BAY FIELD WELL F // ENDPOINT: DRILLING RIG TO DRILL OIL/GAS. WELL PROTECTION STR., PILE CLUSTERS
P19900489	PROPOSED DREDGING AND SHELL MAT
P19900505	DRY NATURAL GAS // 6.625" PIPELINE // 3' MINIMUM BELOW MUDLINE // ENERGY DEVELOPMENT CORORATION, BRETON SOUND // ORIGIN: PROPOSED PLATFORM @ S.L. 13382 NO. 1 // ENDPOINT: TIE-IN POINT TO 12" LINE
P19900522	PROPOSED HELIPOINT & WALKWAY
P19900542	DREDGE A CANAL AND SLIP TO WORKOVER SL 195 MP QQ NO. 22 WELL
P19900545	CONSTRUCT PRODUCTION FACILITY, WATER STORAGE TANK AND OIL TRANSFER PLATFORM, HELIPAD DECK, BOAT DOCK
P19900566	// 2" FLOWLINE // 3' MINIMUM BELOW MUDLINE // PRARIE PRODUCING COMPANY, BLK. 49, PLAQUEMINES PARISH // ORIGIN: S.L. 13383 WELL NO. 1 // ENDPOINT: PRODUCTION PLATFORM
	// 2" FLOWLINE // 3' MINIMUM BELOW MUDLINE // PRARIE PRODUCING COMPANY, BLK. 49, PLAQUEMINES PARISH // ORIGIN: S.L. 13633 WELL NO. 1 // ENDPOINT: PRODUCTION PLATFORM
	// 4" FLOWLINE // 3' MINIMUM BELOW MUDLINE // PRARIE PRODUCING COMPANY, BLK. 49, PLAQUEMINES PARISH // ORIGIN: S.L. 13383 WELL NO. 1 // ENDPOINT: PRODUCTION PLATFORM
	// 4" FLOWLINE // 3' MINIMUM BELOW MUDLINE // PRARIE PRODUCING COMPANY, BLK. 49, PLAQUEMINES PARISH // ORIGIN: S.L. 13633 WELL NO. 1 // ENDPOINT: PRODUCTION PLATFORM
	// 6" PIPELINE // 3' MINIMUM BELOW MUDLINE // PRARIE PRODUCING COMPANY, BLK. 49, PLAQUEMINES PARISH // ORIGIN: PRODUCTION PLATFORM // ENDPOINT: TIE-IN TO SONAT PIPELINE
	FLOWLINES SL 13633 WELL NO. 1
P19900572	DRILLING BARGE/ CONSTRUCT A WELL PROTECTION STRUCTURE
P19900589	FLOWLINE // 3" // 3' MIN BLW MUDLINE // AS-BUILT // ORIGIN: SL 1277 WELL#9 // ENDPOINT: SL 1277 SWPP#2
	FLOWLINE // 3" // 3' MIN BLW MUDLINE // AS-BUILT: 3OF3 // ORIGIN: SL 1277 "H" STRUCTURE // ENDPOINT: SL 1277 WELL#32
	FLOWLINE // 3" // 3' MIN BLW MUDLINE // PROPOSED // ORIGIN: S.L. 1277 # 9 // ENDPOINT: S.L. 1277 S.W.P.P. #2