

## 16TH JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. MARY

## STATE OF LOUISIANA

No. 130-527

DIVISION "B"

LOUISIANA WETLANDS, LLC and NEW 90, LLC

VERSUS

ENERGEN RESOURCES CORPORATION, CHEVRON U.S.A., INC.,  
SOUTHERN NATURAL GAS COMPANY, LLC, EP ENERGY E&P COMPANY, LP,  
and BRAMMER ENGINEERING, INC.

FILED: NOV 30 2020JENNIFER R. SPLANE  
DEPUTY CLERK

**MOTION AND INCORPORATED MEMORANDUM TO EXTEND**  
**(1) DEADLINE FOR RESPONSE TO CHEVRON'S SUBMISSION TO LDNR, and**  
**(2) DEADLINE FOR HEARING ON CHEVRON AND SNG'S LIMITED ADMISSIONS**

Plaintiffs—New 90, LLC and James J. Bailey, III, individually and as representative of the Successions of Willie Palfrey Foster and Fairfax Foster Bailey ("New 90")—move this Court to extend (1) the deadline for responding to the submission to the Louisiana Department of Natural Resources ("LDNR") pursuant to La. R.S. §30:29(C) made by Chevron U.S.A., Inc. ("Chevron"), and (2) the deadline for the consolidated hearing at LDNR regarding the submissions made by Chevron and Southern Natural Gas Company, LLC ("SNG").

Per paragraph 6 of the September 29, 2020 Order entered by this Court, the deadline for responding to Chevron's submission to the LDNR is December 9, 2020. New 90 respectfully requests that deadline be extended to January 8, 2021.

Consistent with that extension, New 90 further respectfully requests that the deadline for holding the consolidated hearing on Chevron and SNG's submissions to the LDNR subject of this Court's November 18, 2020 Order be extended to March 9, 2021.

New 90 has conferred with defendants Chevron and SNG and confirmed they have no opposition to this motion and support granting the relief prayed for here.

Respectfully submitted,

/s/ Emma Elizabeth Antin Daschbach

Gladstone N. Jones, III (#22221)

Bernard E. Boudreaux, Jr. (#02219)

Kevin E. Huddell (#26930)

Emma Elizabeth Antin Daschbach (#27358)

John T. Arnold (#31601)

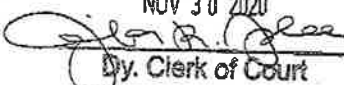
Lindsay E. Reeves (#32703)

RECEIVED AND FILED

A FACSIMILE OF THIS PLEADING  
WAS RECEIVED AND FILED ON

NOV 25 2020

NOV 30 2020

  
Dy. Clerk of Court

Christopher W. Swanson (#37888)  
**Jones Swanson Huddell & Daschbach LLC**  
601 Poydras St., Suite 2655  
New Orleans, Louisiana 70130  
Telephone: (504) 523-2500  
Facsimile: (504) 523-2508

and

James R. Swanson (#18455)  
E. Blair Schilling (#35308)  
**Fishman Haygood, LLP**  
201 St. Charles Ave., Suite 4600  
New Orleans, Louisiana 70170  
Telephone: (504) 586-5252  
Facsimile: (504) 586-5250

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been served upon all known counsel of record by electronic mail and/or placing a copy in the United States mail, postage prepaid and properly addressed.

New Orleans, Louisiana, this 25<sup>th</sup> day of November, 2020.

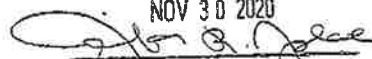
*s/s Emma Elizabeth Antin Daschbach*  
Emma Elizabeth Antin Daschbach

A FACSIMILE OF THIS PLEADING  
WAS RECEIVED AND FILED ON

NOV 25 2020

RECEIVED AND FILED

NOV 30 2020

  
Clerk of Court

16TH JUDICIAL DISTRICT COURT FOR THE PARISH OF ST. MARY

STATE OF LOUISIANA

No. 130-527

DIVISION "B"

LOUISIANA WETLANDS, LLC and NEW 90, LLC

VERSUS

ENERGEN RESOURCES CORPORATION, CHEVRON U.S.A., INC., SOUTHERN NATURAL GAS COMPANY, LLC, EP ENERGY E&P COMPANY, LP, and BRAMMER ENGINEERING, INC.

FILED: NOV 30 2020

JENNIFER R. SPLANE DEPUTY CLERK

ORDER

Considering the foregoing MOTION TO EXTEND (1) DEADLINE FOR RESPONSE TO CHEVRON'S SUBMISSION TO LDNR, and (2) DEADLINE FOR HEARING ON CHEVRON AND SNG'S LIMITED ADMISSIONS;

IT IS HEREBY ORDERED that Paragraph 6 of this Court's September 29, 2020 Order is amended such that the deadline to respond to the submission to the Louisiana Department of Natural Resources pursuant to La. R.S. §30:29(C) made by Chevron U.S.A., Inc. is extended to January 8, 2021;

IT IS FURTHER ORDERED that deadline for holding the consolidated hearing on the submissions to the Louisiana Department of Natural Resources pursuant to La. R.S. §30:29(C) made by Chevron U.S.A., Inc. and Southern Natural Gas Company, LLC—which hearing is the subject of this Court's November 18, 2020 Order—is extended to March 9, 2021.

THUS DONE AND SIGNED on this 14 day of December, 2020, in

St. Martin, Louisiana.

[Signature] Judge, 16th Judicial District Court

RECEIVED AND FILED

A FACSIMILE OF THIS PLEADING WAS RECEIVED AND FILED ON

NOV 25 2020

NOV 30 2020

[Signature] Dy. Clerk of Court