

March 6, 2019

VIA Email

State Mineral and Energy Board P. O. Box 2827 Baton Rouge, LA 70821-2827

Re: State Lease Form Review

Dear Sirs:

In response to the Board's request for industry comments on the proposed changes to the State Lease form, I hereby support the comments submitted by Cynthia Nicholson and Peck Hayne with Gordon Arata Montgomery Barnett, and Tommy Smart with Onebane Law Firm.

While it's appropriate to update the State Lease form to some extent, I do not feel that it is in the best interest of the State to make the lease form more onerous to operators. Leasing of State-owned acreage over the past two years has decreased more than any other time in my 40+ year career. Legacy and coastal lawsuits have caused operators to withdraw from Louisiana and continue to keep others away.

The State Mineral and Energy Board cannot control taxes, wetland mitigation or the legal climate but it can control the lease form. A revision of the lease form should not create additional impediments to exploration and development efforts. Louisiana competes with other states for investments in oil/gas exploration and development and we are losing that battle at the present time due to the quality of opportunities elsewhere and the difficulties that operators face in Louisiana.

Sincerely,

David A. Seay, Land Manager

LLOX, L.L.C. and LLOLA, L.L.C.