



JOHN BEL EDWARDS  
GOVERNOR

State of Louisiana  
DEPARTMENT OF NATURAL RESOURCES  
OFFICE OF CONSERVATION

THOMAS F. HARRIS  
SECRETARY

RICHARD P. IEYOUB  
COMMISSIONER OF CONSERVATION

July 21, 2017

BP America Production Company  
737 N Eldridge Parkway  
Houston, TX 77079  
Attn: Jeannie Haller-Piskurich

RE: State of Louisiana and the Iberville Parish School Board v. BP America Production Company, et al.  
18<sup>th</sup> Judicial District Court, Case No. 72,605-A  
DNR OC Legacy File No. 018-024-001  
Iberville Parish

Dear Ms. Piskurich:

Enclosed herewith is Conservation Order No. ENV 018-024-001 issued to BP America Production Company for the submission of a site investigation, evaluation and/or remediation plan for property subject to the settlement agreement for the referenced lawsuit.

**Please note that all future correspondence to this agency in response to this matter must include the assigned OC Legacy Project No. 018-024-001 and be submitted to:**

Gary W. Snellgrove, Director  
Environmental Division  
P.O. Box 94275  
Baton Rouge, Louisiana 70804-9275

If you have any questions, you may contact Stephen Pennington at 225-342-5562.

Yours very truly,

Gary W. Snellgrove, Director  
Environmental Division

Deponent  
POOLER  
Exh No. 8  
Date 11/21/22  
www.amersonwhite.com

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STATE OF LOUISIANA  
OFFICE OF CONSERVATION  
BATON ROUGE, LOUISIANA

CONSERVATION ORDER NO. ENV 018-024-001

Order for the timely, accurate and comprehensive submission by BP America Production Company of a site investigation, evaluation and/or remediation plan following receipt of, and issuance of agency no objection to, notice of settlement in the matter of State of Louisiana and the Iberville Parish School Board. v BP America Production et al.

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Pursuant to the power delegated under the laws of the State of Louisiana, and particularly Article IX, Section 1 of the 1974 Louisiana Constitution and Title 30 of the Louisiana Revised Statutes of 1950 as amended, and as implemented in rules and regulations promulgated by the Commissioner of Conservation, the following Order is issued and promulgated by the Commissioner of Conservation as being reasonably necessary to carry out the provisions of the laws of this state.

THE COMMISSIONER OF CONSERVATION FINDS AS FOLLOWS THAT:

- 1) In accordance with La. R.S. 30:29.J.(1), on June 30, 2017, this Office received notice of settlement (Settlement) establishing BP America Production Company (BP) responsible for compliance with applicable laws and regulations as required by the Louisiana Department of Natural Resources, Office of Conservation for property subject to the terms and conditions of the Settlement in the matter of State of Louisiana and the Iberville Parish School Board v BP America Production Company et al.
- 2) On July 20, 2017, this Office issued to the reviewing court a letter of no objection to the Settlement.
- 3) Information has been reported to this Office indicating additional action is warranted by BP to address compliance with LAC 43:XIX.Subpart 1.Chapter 3 Onsite Pollution Control regulations.
- 4) Office of Conservation (OC) Legacy Project No. 018-024-001 has been assigned to the property subject to the Settlement.

NOW, THEREFORE, IT IS ORDERED THAT:

- 1) BP shall provide this Office written notification of court approval (or denial) of the Settlement no greater than five (5) business days after it receives notice of court approval (or denial) of the same.
- 2) If approved, within sixty (60) days of court approval of the settlement, BP shall provide an accurate and comprehensive site investigation, evaluation and/or remediation plan (Plan) to this agency as necessary to address compliance with all applicable laws and regulations of the Office of Conservation. At a minimum, the Plan shall include/address Order Items 3 – 7 below.

- 3) The Plan shall include a map or maps drawn to scale identifying all past and/or proposed soil and/or groundwater sample locations and depths.
- 4) The Plan map(s) shall include legible text boxes identifying the parameter(s) and test result(s) exceeding applicable LAC 43:XIX.Subpart 1.Chapter 3 (Chapter 3) regulatory and/or RECAP screening standard for soil and/or groundwater at each sample location.
- 5) The Plan shall include map(s) identifying all areas proposed for investigation, further evaluation, and/or excavation/remediation clearly outlined with proposed depth(s) of investigation, evaluation and/or excavation/remediation. If applicable, for purposes of compliance with RECAP, "areas" above shall include identification of all Areas of Investigation (AOI) and Areas of Concern (AOC).
- 6) The Plan shall demonstrate that the vertical and horizontal extent of all applicable Chapter 3 parameters and/or RECAP constituents of concern has been fully delineated for all impacted media in all AOI's and/or AOC's.
- 7) The Plan shall include a narrative description in sufficient detail notifying this Office who will be responsible for implementing the Plan, how and when the planned activities will proceed, and, if applicable, a post excavation confirmatory sampling strategy and contingency plan to address any remaining post excavation Chapter 3 or RECAP standard exceedances.
- 8) Should an extension beyond the deadline established above to submit a Plan to this Office be necessary, BP shall request approval for an extension in writing with justification prior to the sixty day deadline for agency consideration.
- 9) All correspondence submitted in response to this Order shall include the assigned OC Legacy Project No. 018-024-001.
- 10) In the event the above-referenced information is not provided in compliance with the provisions stated above or as subsequently approved by this Office in writing, pursuant to the power delegated under the laws of the State of Louisiana, this Office may issue compliance orders, which may result in civil penalties.
- 11) This Order shall be effective on and after July 21, 2017

OFFICE OF CONSERVATION  
STATE OF LOUISIANA



Richard P. Ieyoub

Commissioner of Conservation

