



JOHN BEL EDWARDS  
GOVERNOR

**State of Louisiana**  
**DEPARTMENT OF NATURAL RESOURCES**  
**OFFICE OF CONSERVATION**

THOMAS F. HARRIS  
SECRETARY

MONIQUE M. EDWARDS  
COMMISSIONER OF CONSERVATION

June 2, 2023

Sinclair Law Firm, LLC  
P.O. Box 1026  
Shreveport, LA 71163  
Attn: Scott C. Sinclair

**RE: JACK R. GAMBLE JR., LLC V. INDIGO MINERALS, LLC**  
**DOCKET NO. 2023-3171-DNR-OOC**  
**DNR OC LEGACY NO. 042-003-001**

Dear Mr. Sinclair:

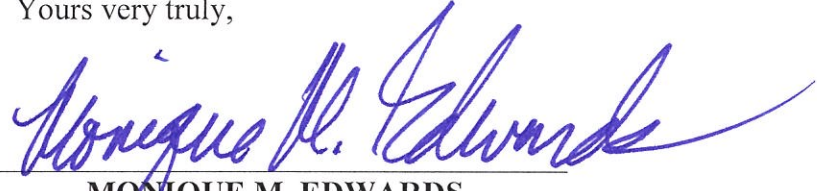
This Office has completed our review of Indigo Minerals, LLC's proposed plan, dated March 15, 2023, related to DNR OC Legacy No. 042-003-001. It has been determined the referenced plan does not meet the requirements outlined in Ch. 6 of Statewide Order 29B in the following particulars:

1. Office of Conservation records indicate water well 031-308 is located within one mile of the subject property boundary and is listed as an active domestic supply well, screened in the interval in question. RECAP Section 2.10 Groundwater Classification 3 notes: *"If a domestic or agricultural water supply well is located within one mile of the AOI property boundaries and is screened in the same stratum as the aquifer of concern or has a direct hydraulic connection, then the aquifer shall be classified as a Groundwater Classification 2 aquifer."* The referenced plan to address groundwater is not in compliance with RECAP Section 2.10 and LAC 43:XIX.611.F.
2. Total Barium at Limited Admission Area SN 239274 is not fully delineated, in particular sample locations SB-1 and SB-2/2R – LAC 43:XIX.611.B.
3. Total Barium at Limited Admission Area SN 239592 is not fully delineated, in particular sample location SB-2/2R – LAC 43:XIX.611.B.
4. Total Barium at Limited Admission Area SN 240035 is not fully delineated, in particular sample locations SB-1/1R, SB-3, and MW-1 – LAC 43:XIX.611.B.
5. Total Barium at Limited Admission Area SN 2400037 is not fully delineated, in particular sample locations SB-1/1R and SB-2/2R – LAC 43:XIX.611.B.

6. As part of the Quality Assurance/Quality Control, Matrix Spike/Matrix Spike Duplicates were not provided – RECAP Section 2.4 and LAC 43:XIX.611.F.
7. Multiple rig supply wells were not included on the figures provided in the referenced plan – LAC 43:XIX.609.A.3.
8. Sample data for locations labeled as EB-1 at Limited Admission Area SN 239274, Limited Admission Area SN 239592, and Limited Admission Area SN 240037 were not provided in the referenced plan – LAC 43:XIX.611.D.1 and E.
9. Multiple soil and groundwater sample results presented in summary tables are not in the same units as the appropriate regulatory standard – RECAP Section 2.5 and LAC 43:XIX.611.F.
10. Future intended use of the property has not been provided – RECAP Section 3.4 and LAC 43:XIX.611.F.

Based on these findings, the Office of Conservation is requesting Indigo Minerals, LLC move for a continuance in this matter by Wednesday, June 7, 2023, so a Statewide Order 29B compliant plan can be submitted to this Office for review.

Yours very truly,



**MONIQUE M. EDWARDS**  
**COMMISSIONER OF CONSERVATION**

MME:gdb

Cc: Honorable Nicholas E. Gasper (via email)  
Honorable Leighann N. Guilbeau (via email)  
All counsel of record (via email)

# SINCLAIR LAW FIRM, L.L.C.

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June 6, 2023

VIA EMAIL AND U.S. MAIL

Honorable Monique M. Edwards  
Commissioner of Conservation  
617 North 3rd Street, 9th Floor  
Baton Rouge, Louisiana 70802

Re: Jack R. Gamble, Jr., LLC v. Indigo Minerals  
LLC, Docket No. 2023-3171-DNR-OOC  
DNR OC Legacy No. 042-003-001

Dear Ms. Edwards:

On behalf of Indigo Minerals LLC, this will respond to the letter from the Office of Conservation dated June 2, 2023 in connection with the referenced limited admission hearing. Conservation's letter was sent by email in the late afternoon on Friday, June 2.

Conservation's letter states that it has determined that Indigo Minerals' proposed plan does not meet the requirements outlined in Chapter 6 of Statewide Order 29B in certain respects that are specified in the letter. Indigo Minerals disagrees with that determination and will respond to each of the assertions below. In addition, we have attached a letter dated June 5, 2023, from Hydro-Environmental Technology, Inc. ("HET") that further addresses each of those assertions. To the extent any of our responses require further explanation, our HET witnesses will be prepared to fully testify on these issues and answer any questions from the panel members.

We are concerned that postponing the limited admission hearing could deprive Indigo Minerals of its legal right to proceed with a limited admission hearing given the scheduled trial date in late October of this year. Article 1563 of the Louisiana Code of Civil Procedure affords Indigo Minerals the right to make a limited admission in cases governed by La. R.S. 30:29. In addition, Article 1563 extends to Indigo Minerals the right to admit into evidence at the trial of this action the limited admission and the plan approved by the Department. Indigo Minerals has exercised those rights in this proceeding by making a timely limited admission and by paying to the Department the sum of \$100,000 as an advance to cover the Department's costs in this proceeding.

La. R.S. 30:29(C) sets out the procedure by which the Department is to fulfill its role in the limited admission process. On March 15, 2023, Indigo Minerals submitted its proposed plan to the Department. Pursuant to La. R.S. 30:29(C)(1), the plaintiff, Jack R. Gamble, Jr., LLC, had thirty days to submit its own plan, or to comment or respond to Indigo Minerals' proposed plan. Gamble LLC did not submit a plan, but did submit a response by letter dated April 14, 2023. Pursuant to La. R.S. 30:29(C)(2), within sixty days of Gamble LLC's submission, the Department is required to

conduct a public hearing on the plan submitted. Pursuant to those rules, a public hearing in this matter was scheduled to commence on June 12, 2023.

In reliance on the timing mandated by R.S. 30:29(C), the case management order established deadlines for making a limited admission that would allow for the completion of the limited admission process prior to the commencement of the trial in the underlying civil proceeding. The trial is set to commence on October 23, 2023. Indigo Minerals' receipt of the benefits afforded by Article 1563 would be thwarted if the mandatory timing provisions of R.S. 30:29(C) were not adhered to by the Department. In order to have a plan approved by the Department by the trial date, the limited admission hearing would need to proceed as scheduled and as mandated by R.S. 30:29(C). The last sentence of R.S. 30:29(C)(2) provides the only mechanism for departing from the mandatory timing provisions.

On motion of the department, for good cause shown, the court may grant the department additional time, not to exceed sixty days, within which to either conduct the hearing or approve a plan with reasons.

The Department has not filed a motion for additional time, and Indigo Minerals respectfully requests that the limited admission hearing proceed as scheduled on June 12, 2023.

Turning to the proposed plan, Indigo Minerals submits that it does meet the requirements of Chapter 6 of Statewide Order 29B. Conservation's letter dated June 2 identifies ten particulars, which are addressed below:

**1. The former Ramsey water well.** RECAP Section 2.10 relates to groundwater classification and provides: "If a domestic or agricultural water supply well is located within one mile of the AOI property boundaries and is screened in the same stratum as the aquifer of concern or has a direct hydraulic connection, then the aquifer shall be classified as a Groundwater Classification 2 aquifer." That provision is not implicated here for two reasons.

First, the Ramsey water well no longer exists and has not existed for many years. The well registration (031-308) was filed in 1955 and reported that the well served a dairy farming operation. On May 16, 2023, the panel members for this limited admission proceeding conducted a site visit and went to the Ramsey water well site. Based on that visit, they were able visually to confirm that the dairy operation had been abandoned and clearly had not been operational for years. Moreover, by email dated June 1, 2023, I was able to confirm to the Department that the heirs of Mr. Ramsey reported having no memory of the water well being in service. I also advised that the Department had been granted permission to enter the Ramsey property and to confirm for itself the non-existence

of the water well. Finally, as stated in the attached letter from HET, their site visit, conducted on June 5, verified that the Ramsey water well no longer exists.

Second, as set forth in the HET letter, the elevation differences between the Ramsey water well and the AOI make it impossible for the Ramsey water well to be screened in the same stratum as the groundwater encountered in the AOI, and there is no direct hydraulic connection.

Indigo Minerals submits that its proposed plan is compliant with RECAP Section 2.10 and with LAC 43:XIX.611.F.

**2-5. Delineation of Total Barium at Certain Limited Admission Areas.** HET's letter addresses these assertions from a technical standpoint. From a legal standpoint, RECAP Section 2.6.1.3 makes it clear that Indigo Minerals' proposed plan is fully compliant with LAC 43:XIX.611.B without any further delineation of total barium. RECAP Section 2.6.1.3 provides, in pertinent part, as follows:

The AOI shall be delineated by comparing the constituent concentration at each sampling location **with the appropriate limiting soil standard for Option being implemented**. All sampling locations having a constituent concentration that **exceeds the limiting soil standard** shall be identified for inclusion in the AOI. **Based on these identified sampling locations**, the horizontal and vertical boundaries of the AOI shall be delineated.

RECAP Section 2.6.1.3 expressly provides that delineation of constituents is to be based on "the appropriate limiting soil standard for Option being implemented." Under Indigo Minerals' proposed plan, the "Option being implemented" is Management Option 1. Pursuant to that option, the applicable limiting soil standard for Total Barium is 5,500 mg/Kg. None of the sample locations had an exceedance of 5,500 mg/Kg for Total Barium. Therefore, by the express provisions of RECAP 2.6.1.3, no further delineation is required for Total Barium, and Indigo Minerals' proposed plan is fully compliant with LAC 43:XIX.611.B.

**6. Matrix Spike/Matrix Spike Duplicates were provided.** Per HET's attached letter, these analyses were performed and the results were included in Indigo Minerals' proposed plan. See Appendix E of the proposed plan.

**7. All Rig Supply Wells are included in figures in the proposed plan.** Per HET's attached letter, the figures accompanying Indigo Minerals' proposed plan do show the locations of all pertinent rig supply wells. See Figure 13 of the proposed plan and Appendix F.

Honorable Monique M. Edwards  
June 6, 2023  
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8. **There is no sample data for locations labeled as EB-1.** Per HET's attached letter, the locations labeled as EB-1 were installed by Approach Environmental and are included in Appendix K of the proposed plan. Indigo Minerals is not aware of any samples being collected from these locations. Therefore, there was no sample data from these locations that could have been included in the proposed plan.

9. **The summary tables report groundwater results in the correct units.** Per HET's attached letter, the summary tables included in Appendix C report the sample results in the units specified by the applicable regulations.

10. **The future intended use of the property was provided.** Per HET's attached letter, the proposed plan, in Section 1.1, does provide the future intended use of the property -- timber harvesting, oil and gas exploration and production and recreational (hunting). Gamble LLC's response to the proposed plan took no issue with these uses. Moreover, as HET explains, the constituent concentrations present no limitations on any reasonably intended uses of the property.

Based on the foregoing, Indigo Minerals' respectfully submits that its proposed plan does meet the requirements of Chapter 6 of Statewide Order 29B. In addition, to the extent this submission does not fully resolve any questions about Indigo Minerals' plan, those questions can be addressed at next week's hearing. Indigo Minerals' further submits that it is entitled by law to proceed with the limited admission hearing scheduled to commence on June 12, 2023, and requests the Department to confirm that the hearing will proceed as scheduled.

Respectfully submitted,

Sincerely,

SINCLAIR LAW FIRM, LLC

By



Scott C. Sinclair

SCS/my  
encl.

Honorable Monique M. Edwards  
June 6, 2023  
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cc (w/encl): Honorable Nicholas E. Gasper (via email)  
Honorable Leighann N. Gilbeau (via email)  
John Adams (via email)  
Jonathan Rice (via email)  
All counsel of record (via email)





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June 05, 2023

Mr. Scott C. Sinclair  
Attorney at Law  
Sinclair Law Firm  
P.O. Box 1026  
Shreveport, Louisiana 71163-1026

Re: **Response to Agency Comments**

Site Investigation Report and Proposed Remediation Plan  
Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC  
42<sup>nd</sup> Judicial District Court, Docket No. 81488, Division "B"  
Belle Bower, Bethany Longstreet, and Logansport Oil and Gas Fields  
Sections 26, 34, and 35; Township 13 North; Range 16 West and  
Section 02, Township 12 North, Range 16 West  
DeSoto Parish, Louisiana  
LDNR OC Legacy Project No. 042-003

Dear Mr. Sinclair:

Hydro-Environmental Technology, Inc. (HET) has reviewed comments raised by the Louisiana Department of Natural Resources (LDNR) Office of Conservation regarding the captioned Plan in a letter dated June 02, 2023, and offer the following responses. Note that the Plan dated March 15, 2023, was prepared in connection with a Limited Admission made by Indigo Minerals, LLC (Indigo) in the captioned case. For reference, Figure 1 contains a topographic map illustrating the locations of the Property included in the petition. Figure 2 contains a current aerial photograph illustrating the locations of the Limited Admission Areas (LAAs).

- 1. Office of Conservation records indicate water well 031-308 is located within one mile of the subject property boundary and is listed as an active domestic supply well, screened in the interval in question. RECAP Section 2.10 Groundwater Classification 3 notes: "If a domestic or agricultural water supply well is located within one mile of the AOI properly boundaries and is screened in the same stratum as the aquifer of concern or has a direct hydraulic connection, then the aquifer shall be classified as a Groundwater Classification 2 aquifer." The referenced plan to address groundwater is not in compliance with RECAP Section 2.10 and LAC 43:XIX.611.F.***

The referenced former water well 031-308 is not screened in the same stratum and is not in direct hydraulic communication with the shallow water bearing zones encountered on the Gamble property (the "Property"). Data demonstrates that the shallow water bearing zones encountered on the Property are discontinuous in nature and incapable of being in hydraulic communication regionally (Figures 14 to 17 of the Plan). Furthermore, the elevation of the former water well 031-308 well is listed at 305 feet above sea level (ASL) with a measured depth of 22.1 feet below top of casing. Therefore, the bottom of the "screened interval" of the former water well would be at an approximate elevation of 282.9 feet ASL. Comparatively, the highest surface elevation of a monitor well on the Property is 269.18 feet ASL (240833 MW-7), with groundwater encountered twenty (20) feet below the top of casing (249.18 feet ASL).



Thus, the monitor wells installed as part of the investigation of the Property are not screened in the same interval as the former water well as this interval does not exist on the Property as a result of being eroded away from the top of the Sabine Uplift. Additionally, given the limited yield calculated as less than 800 gallons per day (Appendix J of the Plan) results in a groundwater classification of GW<sub>3</sub> in accordance with RECAP, Section 2.10.

Additionally, HET observed the Ramsey property on June 05, 2023 on which the former water well was installed and was unable to locate the well. HET will be happy to coordinate a site inspection with appropriate agencies to document that the well is not present.

Finally, the captioned Plan included a hypothetical groundwater remediation proposal (Appendix N of the Plan) in the event that the department required such an option for compliance with LAC 43:XIX.611.F. Furthermore, the Plan includes an option for groundwater monitoring to evaluate concentration trends in accordance with LAC 43:XIX.309.

**2. *Total Barium at Limited Admission Area SN 239274 is not fully delineated, in particular sample locations SB-1 and SB-2/2R-LAC 43:XIX.611.B.***

Laboratory analytical results from soil samples collected were analyzed for True Total Barium per Statewide Order 29-B and total barium per Environmental Protection Agency (EPA) SW-846 Method 6010B. All reported concentrations of True Total Barium were below the Statewide Order 29-B standard of 40,000 ppm considering upland criteria. Additionally, all reported metal concentrations were determined to be below the RECAP 2003 screening standards, with the exception of barium in Approach Environmental (AE) soil boring SB-2 at a depth of eight (8) to ten (10) feet BLS. The total barium concentration of 2,390 ppm was reported above the RECAP 2003 non-industrial and soil protective of groundwater screening standards but below the RECAP 2003 Management Option 1 standard of 5,500 ppm. The LDNR letter references SB-1, but no barium analysis was run on samples from that location.

HET was not on-site during the installation of this boring in August of 2020 and installed reproduction boring SB-2R in April of 2021. The additional analyses at SB-2R at a depth of eight (8) to ten (10) feet BLS by both HET and AE demonstrated that the barium concentrations is below the threshold to result in cross media transfer by comparing the SPLP barium analysis to the result of the default dilution and attention factor (DAF) of twenty (20) multiplied by the groundwater drinking water standard of two (2) mg/L for barium, thus eliminating the RECAP 2003 soil protective of groundwater screening standard of 2,000 ppm from consideration. Furthermore, AE split sample reported a barium concentration of 261 ppm, which did not confirm the initial level of total barium reported in 2020. This is consistent with several concentrations reported in the AE data that were unable to be confirmed through re-analyses. As a result, all concentrations were determined to meet RECAP 2003 screening (550 ppm) and Management Option 1 (5,500 ppm) standards.

Therefore, pursuant to RECAP Section 2.6.1.3, total barium has been fully delineated.

**3. *Total Barium at Limited Admission Area SN 239592 is not fully delineated, in particular sample location SB-2/2R - LAC 43:XIX.611.B.***

All concentrations of True Total Barium reported concentrations below the Statewide Order 29-B standard of 40,000 ppm considering upland criteria. Additionally, all reported metal concentrations were determined to be below the RECAP screening standards, with the exception of barium in AE soil boring SB-2 and HET soil boring SB-2R. The reported concentrations, however, are below the updated RECAP screening standard of 1,600 mg/Kg, the MO-1 standard of 5,500 mg/Kg, and the soil protective of groundwater standard of 2,000 mg/Kg.

Therefore, pursuant to RECAP Section 2.6.1.3, total barium has been fully delineated.

**4. Total Barium at Limited Admission Area SN 240035 is not fully delineated, in particular sample locations SB-1/1R, SB-3, and MW-1- LAC 43:XIX.611.B.**

All concentrations of True Total Barium reported concentrations below the Statewide Order 29-B standard of 40,000 ppm considering upland criteria. Additionally, all reported metal concentrations were determined to be below the RECAP screening standards, with the exception of barium in AE soil borings SB-1, SB-3R and MW-1. All reported concentrations are below the updated RECAP screening standard of 1,600 mg/Kg, the MO-1 standard of 5,500 mg/Kg, and the soil protective of groundwater standard of 2,000 mg/Kg, with the exception of the soil sample collected from AE soil boring SB-1 and HET soil boring SB-1R at a depth of eight (8) to ten (10) feet BLS, which reported initial concentrations of 2,380 mg/Kg and 1,650 mg/Kg, respectively.

HET was not present during AE's assessment conducted in 2020 and installed a reproduction boring in April of 2021. The barium concentration was unable to be confirmed in split samples by AE during HET's investigation at concentrations above the soil protective of groundwater standard of 2,000 mg/Kg, with the reproduction concentration reported as 1,650 mg/Kg. Furthermore, similar analyses of SPLP barium as described above have determined that the residual barium concentration is below the threshold to result in cross media transfer, thus eliminating the soil protective of groundwater standard of 2,000 ppm from consideration.

Therefore, pursuant to RECAP Section 2.6.1.3, total barium has been fully delineated.

**5. Total Barium at Limited Admission Area SN 240037 is not fully delineated, in particular sample locations SB-1/1R and SB-2/2R-LAC 43:XIX.611.B.**

All concentrations of True Total Barium reported concentrations below the Statewide Order 29-B standard of 40,000 ppm considering upland criteria. Additionally, all reported metal concentrations were determined to be below the RECAP screening standards, with the exception of barium in AE soil borings SB-1, SB-2 and MW-2 and HET soil borings SB-1R and SB-2R. The reported concentrations, however, are below the MO-1 standard of 5,500 mg/Kg and the soil protective of groundwater standard of 2,000 mg/Kg. Furthermore, all but one (1) sample, being the sample collected from HET soil boring SB-2R from a depth of eight (8) to ten (10) feet BLS, reported concentrations below the updated RECAP screening standard of 1,600 mg/Kg as determined in Section 5.5 of the Plan.

Therefore, pursuant to RECAP Section 2.6.1.3, total barium has been fully delineated.

**6. As part of the Quality Assurance/Quality Control, Matrix Spike/Matrix Spike Duplicates were not provided- RECAP Section 2.4 and LAC 43:XIX.611.F.**

Matrix Spike and Matrix Spike Duplicate analyses were performed at the selection of the laboratory for samples submitted by HET to SGS and Waypoint. The results of these quality assurance results are included in each laboratory report associated with HET samples. These reports were included in Appendix E of the Plan.

**7. Multiple rig supply wells were not included on the figures provided in the referenced plan – LAC 43:XIX.609.A.3.**

The locations of rig supply wells were included in Figure 13 of the Plan which HET understands complies with applicable regulations. For clarification and demonstrative purposes, please refer to Figure 3 (revised Figure 5 from the Plan) for a depiction of the location of rig supply wells on the Property. Note that the locations are based on the coordinates listed in the LDNR database and not the actual location on the well pad. HET can provide updated coordinates as necessary.

- 8. Sample data for locations labeled as EB-1 at Limited Admission Area SN 239274, Limited Admission Area SN 239592, and Limited Admission Area SN 240037 were not provided in the referenced plan — LAC 43:XIX.611.D.I and E.**

HET depicted the location of the series of borings labeled as EB-1 on each well pad as installed by AE and included the AE report for reference in Appendix K of the Plan. The EB borings were installed in locations at distance from the operational area apparently for lithologic purposes only with no samples collected by AE or included in its report. HET was not on-site during this sampling event and is not aware of any samples collected from these locations by AE.

- 9. Multiple soil and groundwater sample results presented in summary tables are not in the same units as the appropriate regulatory standard - RECAP Section 2.5 and LAC 43:XIX.611.F.**

All reported concentrations were tabulated in accordance with applicable comparative standards in the HET tables contained in Appendix C of the Plan, which included the results from AE. Unless otherwise referenced, all concentrations were reported on parts per million (ppm), either as milligrams per Kilogram (mg/Kg) or milligrams per Liter (mg/L). Notable exceptions to this include the Statewide Order 29-B salt-related parameters (EC, SAR, ESP) and oil and grease, which are reported in units consistent with LAC 43:XIX.313.

- 10. Future intended use of the property has not been provided-RECAP Section 3.4 and LAC 43:XIX.611.F.**

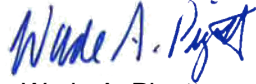
The Property is primarily utilized to harvest timber, as well as oil and gas exploration and production activities and recreational uses (hunting) as described in Section 1.1 of the Plan. The Lease agreement also includes potential future uses of the Property in Item 28. Furthermore, the Plan presented is protective of human health and the environment under a non-industrial exposure scenario. As a result, any potential remnant constituent concentrations, if any, do not pose limitations or encumbrances on any reasonably intended future use of the property. The incorporation of regulatory standards was part of the overall assessment conducted to ensure that the Property could be used for its intended purposes.

The Plan is based on field data collected and information received from the client, other parties associated with the client and other third parties during the period of September 28, 2020 to June 05, 2023. All conclusions and recommendations are based on available information cited herein and should be reviewed within this context. Should conditions at the site in question change, or additional information become available, especially with regard to prior site conditions, it may be necessary to modify these conclusions and recommendations accordingly in the future. The contents of this Plan are proprietary, and text, illustrations, and/or any other parts of this Plan may not be reproduced without the express written permission of HET.

Hydro-Environmental Technology, Inc. appreciates the opportunity to provide this plan for professional environmental services. Should you have any questions or need further information, please feel free to contact us.

Sincerely,

HYDRO-ENVIRONMENTAL TECHNOLOGY, INC.



Wade A. Pigott  
Chief Hydrogeologist



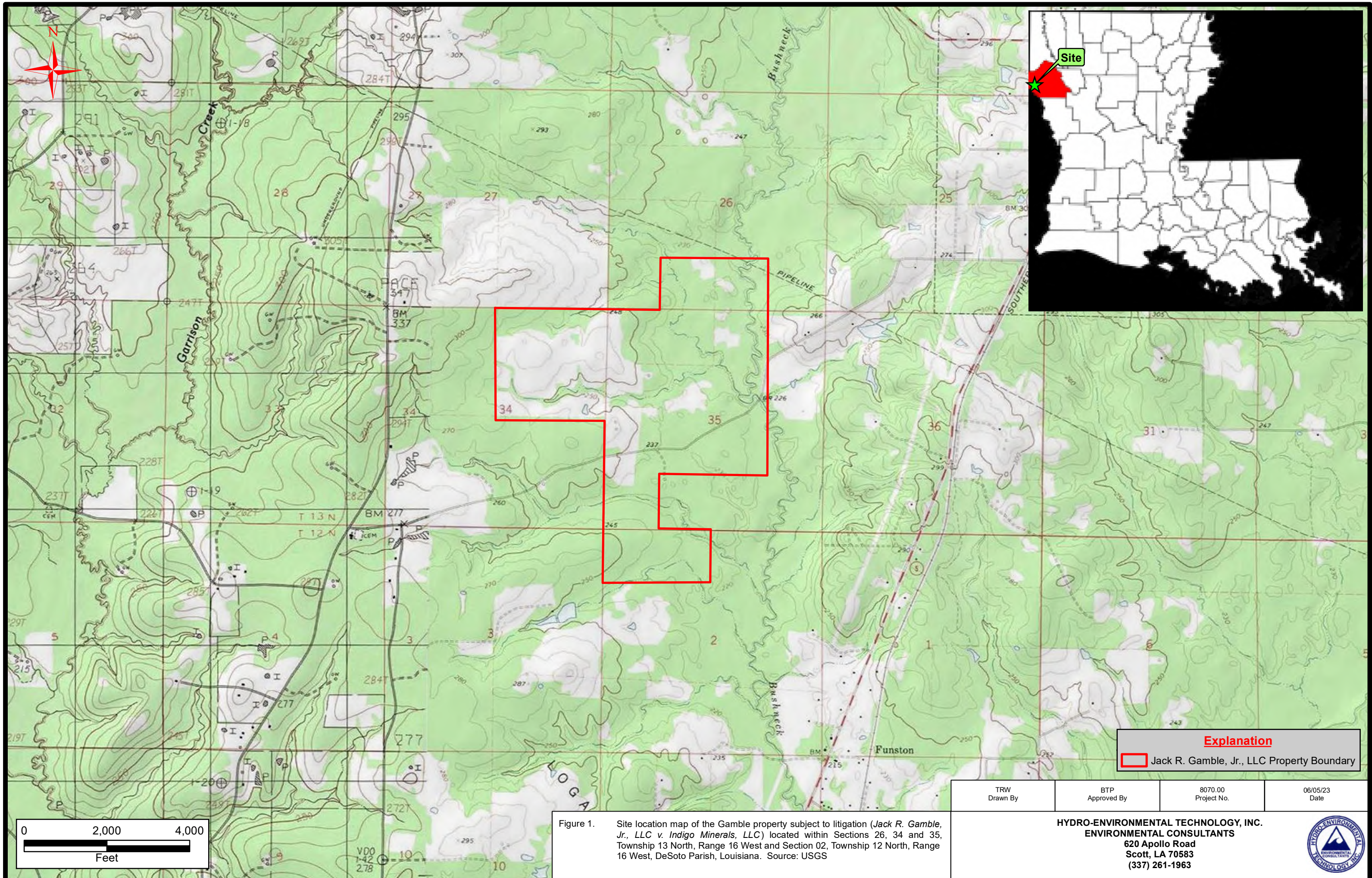
Brent T. Pooler  
Principle Risk Analyst



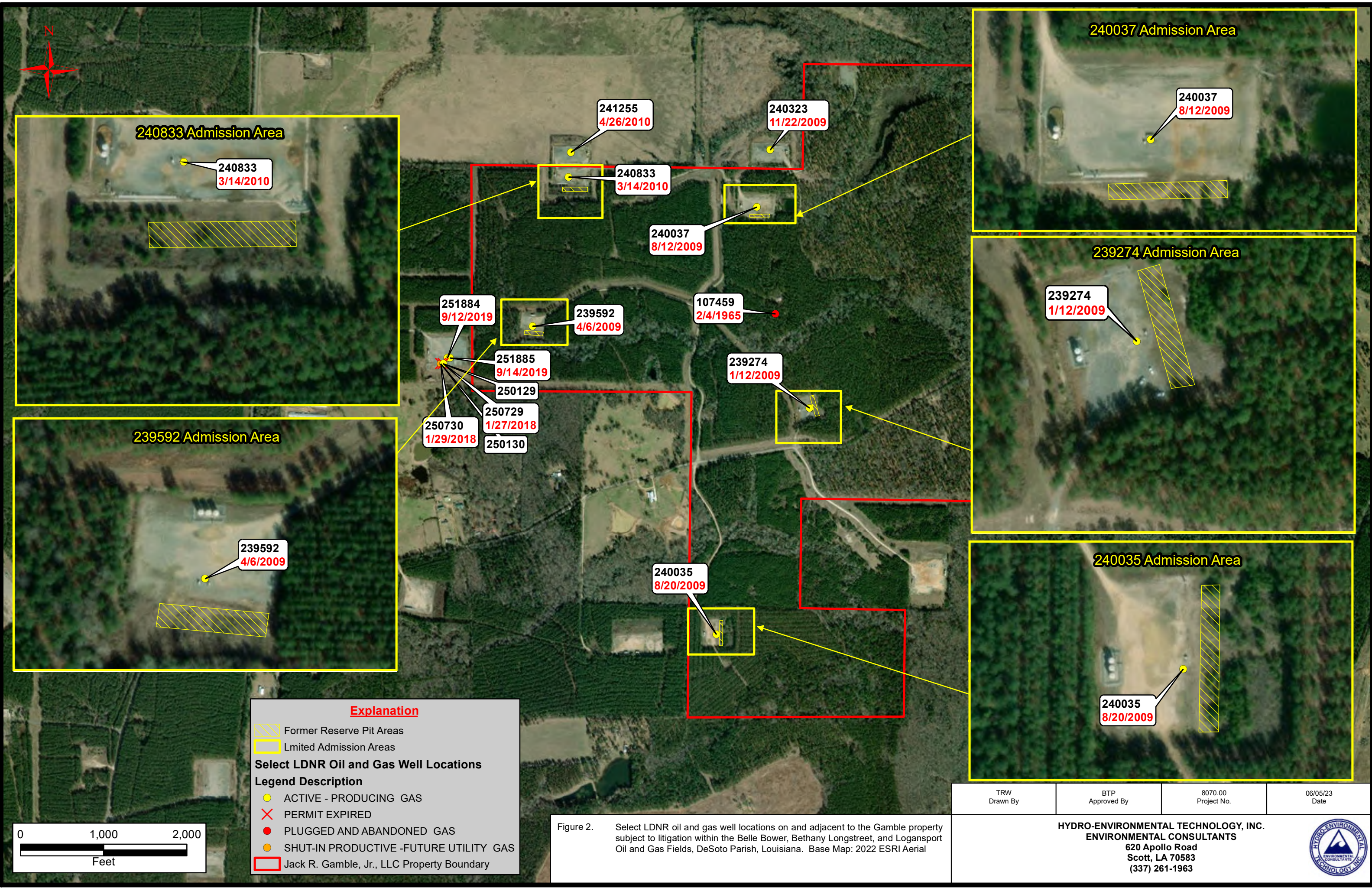
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## FIGURES











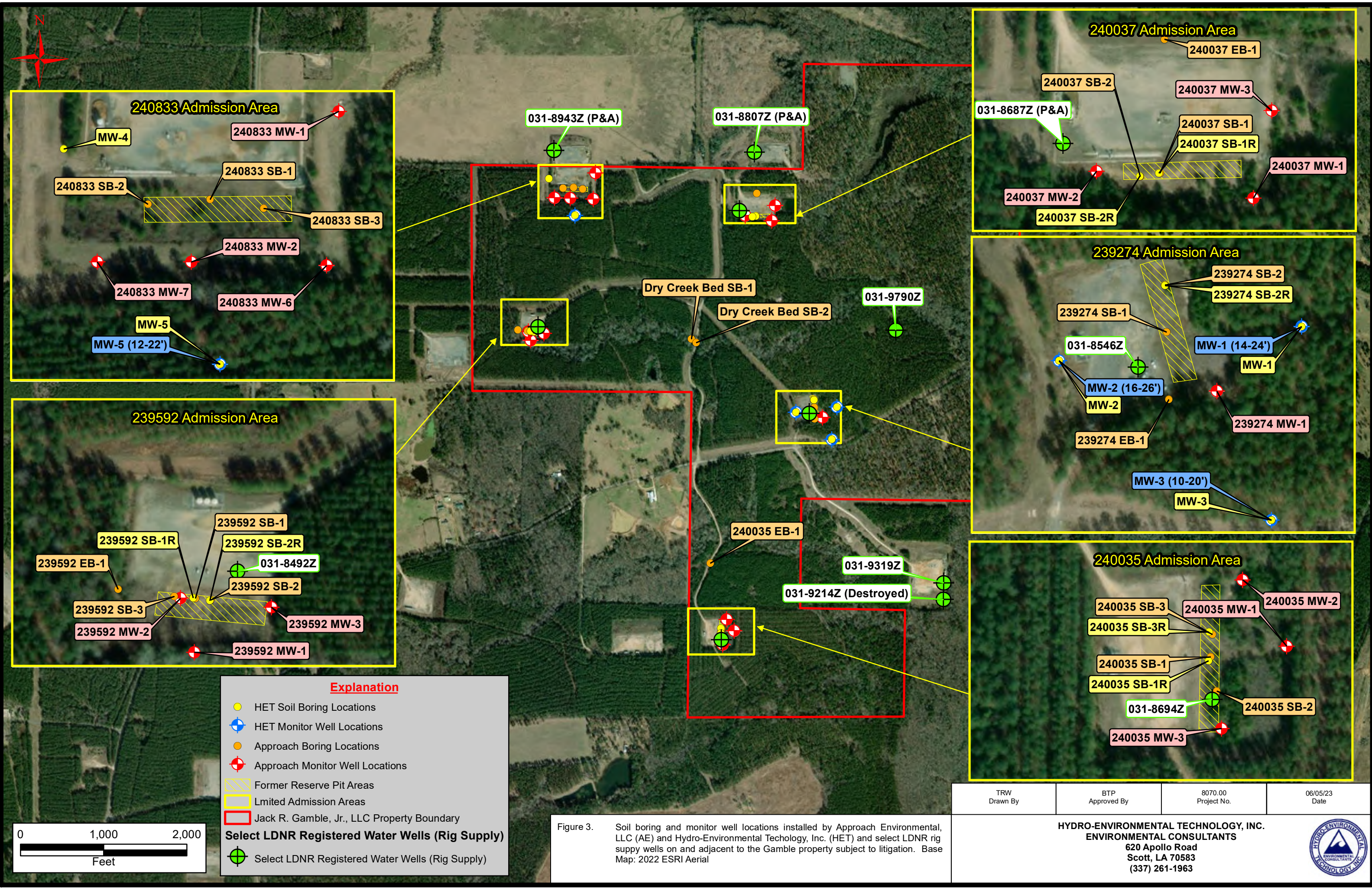


Figure 3. Soil boring and monitor well locations installed by Approach Environmental, LLC (AE) and Hydro-Environmental Technology, Inc. (HET) and select LDNR rig supply wells on and adjacent to the Gamble property subject to litigation. Base Map: 2022 ESRI Aerial



## Brent T. Pooler

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**From:** Scott C. Sinclair <ssinclair@sinclair-law.com>  
**Sent:** Tuesday, June 6, 2023 5:31 PM  
**To:** Stewart L. Stover; Wade A. Pigott; Brent T. Pooler  
**Cc:** Craig Isenberg; Taylor L. Gamm  
**Subject:** FW: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

SWB:

Here is the feedback from our letters. We'll schedule a time to discuss further.

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**From:** Jonathan Rice <Jonathan.Rice@la.gov>  
**Sent:** Tuesday, June 6, 2023 5:23 PM  
**To:** Scott C. Sinclair <ssinclair@sinclair-law.com>; 'Kevin Huddell' <KHuddell@jonesswanson.com>; 'Edwin Hightower' <ehightower@adminlaw.la.gov>  
**Cc:** Jamie Love (DNR) <Jamie.Love@la.gov>; Houston Holley <Houston.Holley@LA.GOV>; Claudia Rush (DNR) <Claudia.Rush4@la.gov>; 'Bernard Boudreaux' <BBoudreaux@jonesswanson.com>; Gavin Broussard <Gavin.Broussard@la.gov>; 'OAL Processing' <OALProcessing@adminlaw.la.gov>; 'Cheryl Berner' <CBerner@jonesswanson.com>; 'Gladstone Jones' <GJones@jonesswanson.com>; 'Taylor Townsend' <taylor@taylortownsendlaw.com>; 'Craig Isenberg' <cisenberg@barrassousdin.com>; swebre@barrassousdin.com; 'Alan Ezkovich' <Alan.Ezkovich@ezkovichlaw.com>; 'Lynn Swanson' <LSwanson@jonesswanson.com>; john.king@bswllp.com; 'Taylor L. Gamm' <tgamma@barrassousdin.com>; dluder@barrassousdin.com; 'Jude C. Bursavich' <jude.bursavich@bswllp.com>; 'Michael Arata' <MArata@jonesswanson.com>; 'John Arnold' <JArnold@jonesswanson.com>; 'Alayne Gobeille' <agobeille@jonesswanson.com>; 'Tom Dixon' <tdixon@jonesswanson.com>; 'Rosa Acheson' <RAcheson@jonesswanson.com>; Monique Edwards (DNR) <Monique.Edwards@la.gov>; Jonathan Rice <Jonathan.Rice@la.gov>  
**Subject:** 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Mr. Sinclair:

The Division of Administrative Law has continued this matter in light of the Office of Conservations June 2<sup>nd</sup> letter sent to your office. We are again requesting that Indigo move for a continuance (on behalf of the DNR/OC) by tomorrow, June 7, 2023, so a Statewide Order 29B compliant plan can be submitted to this Office for review.

Again, please see the reasons set forth in Conservation's June 2<sup>nd</sup> letter; and furthermore, please see the reasons and responses (to your June 6<sup>th</sup> letter to the Commissioner) set forth below.

1. A picture of the well and affidavit by both parties confirming that the picture is an accurate representation that that there is not well present.
2. Provide cross sections, including all available data (rig supply wells and EB borings).
3. Hypothetical plan must include the following missing information: a text description of the plan and what methodology would be performed for each well.
4. SN 239274: Provide samples for locations to the north, east and west of SB-2.

5. SN 239592: Provide a delineation to the east and north and SPLP for SB-2/2R (8-10) at the depth of 8-10 ft bgs.
6. SN 240035: Provide delineation from east, south, and west for sample SB1/1R at the depth of 8-10 ft bgs. Provide delineation samples for north, east, and west of this location for SB-3 at the depth of 0-2 ft bgs. MW-1 at 8-12 ft bgs should be sampled above and below for delineation. Horizontally it should be delineated at the highest exceedance for barium.
7. SN 240037: More samples needed for these areas: SB-1/1R at the depth of 0-2 ft bgs should be horizontally delineated. SB-2/2R at the depth of 8-10 ft bgs should be sampled above and below for barium.
8. Please provide all data in the tables in the same units as required by – RECAP Section 2.5 & LAC 43:XIX.611.F.
9. It is noted that Indigo's June 6<sup>th</sup> letter provides the intended future use of the property.
10. According to RECAP Section 2.4 and LAC 43:XIX.611.F, 1 matrix spike/matrix spike duplicate from the site per 20 field samples shall be provided.

The sooner your client provides the necessary requested information for a compliant plan, the sooner Conservation can reset the Administrative Hearing to provide sufficient time prior to your trial set in October 23, 2023. Please notify Conservation if Indigo does not intend to file a Continuance on DNR//OC's behalf. Thank you for your time and attention to this matter.

Best regards,

F. Jonathan Rice, Attorney  
LDNR / Office of Conservation  
Executive Division  
P.O. Box 94275  
Baton Rouge, LA 70804-9275  
Phone: (225) 342-9660  
Fax: (225) 342-3705  
[Jonathan.rice@la.gov](mailto:Jonathan.rice@la.gov)

---

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**Brent T. Pooler**

---

**From:** Scott C. Sinclair <ssinclair@sinclair-law.com>  
**Sent:** Thursday, June 8, 2023 3:13 PM  
**To:** Craig Isenberg; Wade A. Pigott; Stewart L. Stover; Brent T. Pooler  
**Subject:** FW: Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001

---

**From:** Claudia Rush (DNR) <Claudia.Rush4@la.gov>  
**Sent:** Thursday, June 8, 2023 3:04 PM  
**To:** ssinclair@sinclair-law.com  
**Cc:** Jonathan Rice <Jonathan.Rice@la.gov>  
**Subject:** Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001

Good afternoon Mr. Sinclair,

We asked our technical petroleum scientist to clarify the deficiency issue regarding the barium delineation. She stated the following:

At the time we do not have a clear picture of the extent of the barium. While the barium is below MO-1 standards, it ends on a high concentration or does not have coordinating samples at the same depth horizontally to fully delineate. For instance, 240037-SB-2/2R at 8-10 feet does not have samples above 8 feet, nor was barium sampled below 10 feet.

I think this suggest further sampling is required at a slightly deeper depth or in different area. Please provide this to your consultants and feel free to contact us if you need further clarification on this point.

Sincerely,

Claudia Rush



**Claudia I Rush**  
Attorney  
Office of Conservation

**Department of Natural Resources**  
Post Office Box 94275  
LaSalle Building  
617 North Third Street  
Baton Rouge, LA 70804  
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Emal: [claudia.rush4@la.gov](mailto:claudia.rush4@la.gov)

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## Brent T. Pooler

---

**From:** Scott C. Sinclair <ssinclair@sinclair-law.com>  
**Sent:** Friday, June 16, 2023 10:14 AM  
**To:** Stewart L. Stover; Wade A. Pigott; Brent T. Pooler  
**Subject:** FW: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]  
**Attachments:** Fig. HET Proposed Delineation Boring Locations (239274 Admission Area).pdf; Fig. HET Proposed Delineation Boring Locations (239592 Admission Area).pdf; Fig. HET Proposed Delineation Boring Locations (240035 Admission Area).pdf; Fig. HET Proposed Delineation Boring Locations (240037 Admission Area).pdf

FYI. This is what we sent to DNR on Wednesday.

We'll keep you posted on any response.

SCS

---

**From:** Scott C. Sinclair <ssinclair@sinclair-law.com>  
**Sent:** Wednesday, June 14, 2023 1:53 PM  
**To:** 'Claudia Rush (DNR)' <Claudia.Rush4@la.gov>; 'Gladstone Jones' <GJones@jonesswanson.com>; 'Jonathan Rice' <Jonathan.Rice@la.gov>  
**Cc:** 'Kevin Huddell' <KHuddell@jonesswanson.com>; 'Edwin Hightower' <ehightower@adminlaw.la.gov>; 'Jamie Love (DNR)' <Jamie.Love@la.gov>; 'Houston Holley' <Houston.Holley@LA.GOV>; 'Bernard Boudreaux' <BBoudreaux@jonesswanson.com>; 'Gavin Broussard' <Gavin.Broussard@la.gov>; 'OAL Processing' <OALProcessing@adminlaw.la.gov>; 'Cheryl Berner' <CBerner@jonesswanson.com>; 'Taylor Townsend' <taylor@taylortownsendlaw.com>; 'Craig Isenberg' <cisenberg@barrassousdin.com>; 'swebre@barrassousdin.com' <swebre@barrassousdin.com>; 'Alan Ezkovich' <alan.ezkovich@ezkovichlaw.com>; 'Lynn Swanson' <LSwanson@jonesswanson.com>; 'john.king@bswllp.com' <john.king@bswllp.com>; 'Taylor L. Gamm' <tgamm@barrassousdin.com>; 'dluder@barrassousdin.com' <dluder@barrassousdin.com>; 'Jude C. Bursavich' <jude.bursavich@bswllp.com>; 'Michael Arata' <MArata@jonesswanson.com>; 'John Arnold' <JArnold@jonesswanson.com>; 'Alayne Gobeille' <agobeille@jonesswanson.com>; 'Tom Dixon' <tdixon@jonesswanson.com>; 'Rosa Acheson' <RAcheson@jonesswanson.com>; 'Monique Edwards (DNR)' <Monique.Edwards@la.gov>  
**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Jonathan and Claudia:

Thank you for the clarification that the only constituent for delineation is total Barium. That is how we understood the previous communications, but we appreciate you clarifying it.

Indigo Minerals reserves all substantive and procedural rights with respect to this entire matter. Nevertheless, as we have said previously, we will work cooperatively with the Commission to obtain additional information and we are committed to working with your office to obtain that information in a timely fashion so that the panel can timely formulate a final plan and so that Indigo's substantive and procedural rights to present that plan to the jury are preserved.

Regarding the Barium delineation, attached are maps showing the proposed sampling locations. Please share this information with the technical team and let us know if they have any comments or questions. Our plan is to begin this work on Monday, June 19. We also plan to request the lab to provide the Barium results on an expedited basis.

We look forward to hearing from you.

Scott C. Sinclair

Sinclair Law Firm  
PO Box 1026  
Shreveport, LA 71163-1026  
(318) 562-3700  
[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)

---

**From:** Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>

**Sent:** Monday, June 12, 2023 5:02 PM

**To:** Gladstone Jones <[GJones@joneesswanson.com](mailto:GJones@joneesswanson.com)>; Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

**Cc:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>; Kevin Huddell <[KHuddell@joneesswanson.com](mailto:KHuddell@joneesswanson.com)>; Edwin Hightower <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>; Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; Bernard Boudreaux <[BBoudreaux@joneesswanson.com](mailto:BBoudreaux@joneesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; OAL Processing <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; Cheryl Berner <[CBerner@joneesswanson.com](mailto:CBerner@joneesswanson.com)>; Taylor Townsend <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; Craig Isenberg <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); Alan Ezkovich <[alan.ezkovich@ezkovichlaw.com](mailto:alan.ezkovich@ezkovichlaw.com)>; Lynn Swanson <[LSwanson@joneesswanson.com](mailto:LSwanson@joneesswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); Taylor L. Gamm <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); Jude C. Bursavich <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; Michael Arata <[MArata@joneesswanson.com](mailto:MArata@joneesswanson.com)>; John Arnold <[JArnold@joneesswanson.com](mailto:JArnold@joneesswanson.com)>; Alayne Gobeille <[agobeille@joneesswanson.com](mailto:agobeille@joneesswanson.com)>; Tom Dixon <[tdixon@joneesswanson.com](mailto:tdixon@joneesswanson.com)>; Rosa Acheson <[RAcheson@joneesswanson.com](mailto:RAcheson@joneesswanson.com)>; Monique Edwards (DNR) <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>

**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Good afternoon Mr. Jones,

After reviewing your email, we would like to clarify a certain point. The June 6<sup>th</sup> email, which was sent to both parties, is a clarification of the June 2<sup>nd</sup> email. As part of our review we need a delineation of the onsite **total Barium** only. Our technical team has not requested nor needs a delineation of any other constituents.

Sincerely,  
Claudia Rush





Boring: PB-2  
Type: Horizontal  
Constituent: Total Barium  
Depth: 8-10 ft

Boring: PB-3  
Type: Horizontal  
Constituent: Total Barium  
Depth: 8-10 ft

Boring: PB-1  
Type: Horizontal  
Constituent: Total Barium  
Depth: 8-10 ft

239274 SB-2R  
239274 SB-2

239274 SB-1

HET MW-1 (14-24')

HET MW-2 (16-26')

239274  
1/12/2009

239274 MW-1

239274 EB-1

HET MW-3 (10-20')

Well Serial  
Spud Date

Explanation

- HET Proposed Delineation Soil Borings (SN 239274)
- Approximate Property Boundary (Approach)
- HET Monitor Well Locations
- HET Boring Locations
- Approach Monitor Well Locations
- Approach Boring Locations
- Approximate Reserve Pit Locations (Approach)
- Gas Well - Serial Number/Spud Date

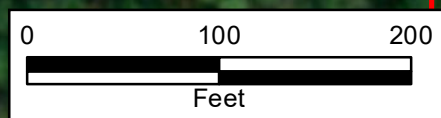
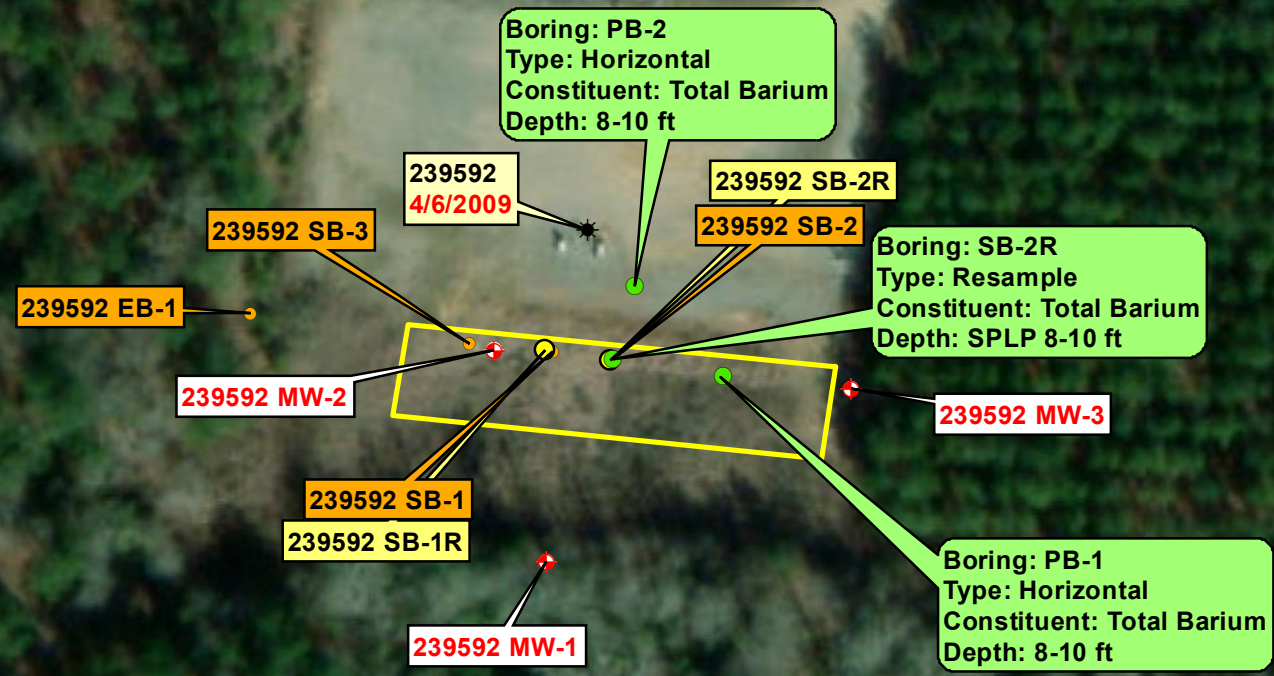


Figure 239274. HET proposed delineation soil borings on and adjacent to Well Pad-239274 on the Gamble property located near Longstreet, DeSoto Parish, Louisiana. Base Map: 2022 ESRI Aerial

TRW Drawn By	BTP Approved By	8070.00 Project No.	06/13/2023 Date
-----------------	--------------------	------------------------	--------------------

**HYDRO-ENVIRONMENTAL TECHNOLOGY, INC.**  
**ENVIRONMENTAL CONSULTANTS**  
620 Apollo Road  
Scott, LA 70583  
(337) 261-1963





**Well Serial**  
**Spud Date**

Explanation	
	HET Proposed Delineation Soil Borings (SN 239592)
	Approximate Property Boundary (Approach)
	HET Monitor Well Locations
	HET Boring Locations
	Approach Monitor Well Locations
	Approach Boring Locations
	Approximate Reserve Pit Locations (Approach)
	Gas Well - Serial Number/Spud Date

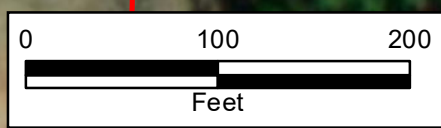
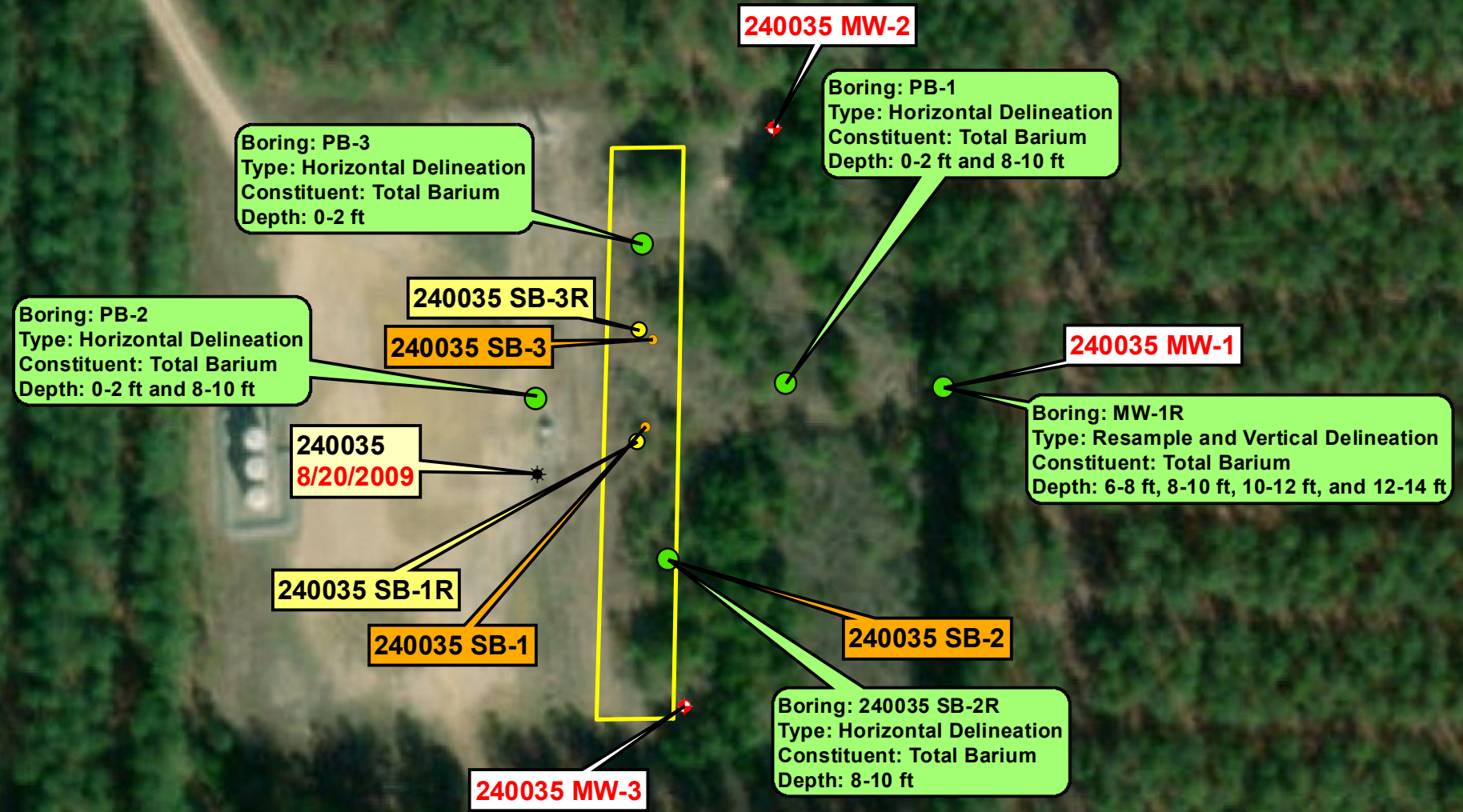


Figure 239592. HET proposed delineation soil boring locations on and adjacent to Well Pad-239592 on the Gamble property located near Longstreet, DeSoto Parish, Louisiana. Base Map: 2022 ESRI Aerial

TRW Drawn By	BTP Approved By	8070.00 Project No.	06/13/2023 Date
-----------------	--------------------	------------------------	--------------------

**HYDRO-ENVIRONMENTAL TECHNOLOGY, INC.**  
**ENVIRONMENTAL CONSULTANTS**  
620 Apollo Road  
Scott, LA 70583  
(337) 261-1963





**Well Serial**  
**Spud Date**

Explanation	
	HET Proposed Delineation Soil Borings (SN240035)
	HET Monitor Well Locations
	HET Boring Locations
	Approach Monitor Well Locations
	Approach Boring Locations
	Approximate Reserve Pit Locations (Approach)
	Gas Well - Serial Number/Spud Date

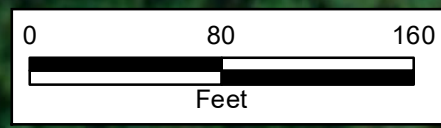
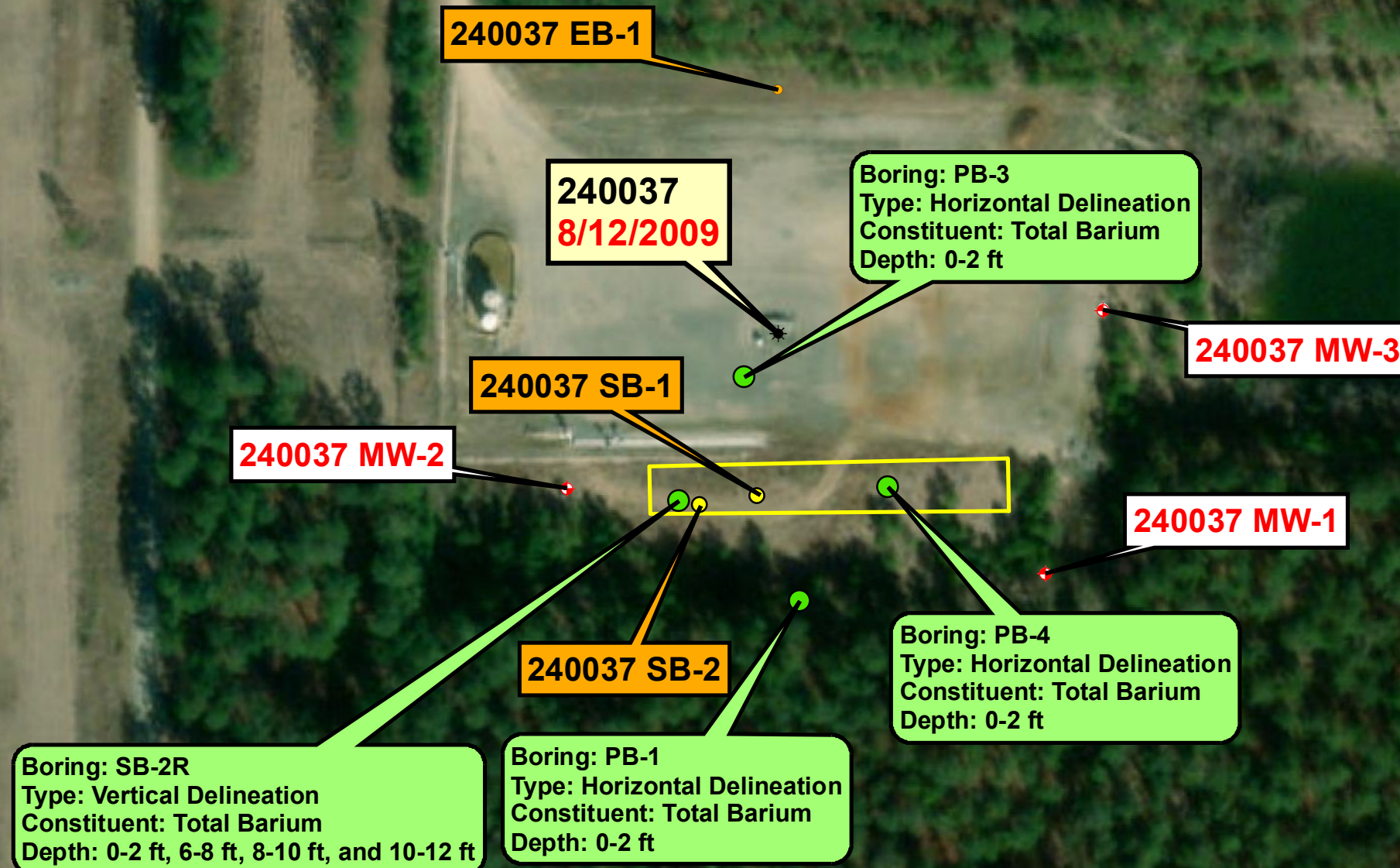


Figure 240035. HET proposed delineation soil borings on and adjacent to Well Pad-240035 on the Gamble property located near Longstreet, DeSoto Parish, Louisiana. Base Map: 2022 ESRI Aerial

DJB Drawn By	BTP Approved By	8070.00 Project No.	06/13/2023 Date
-----------------	--------------------	------------------------	--------------------

**HYDRO-ENVIRONMENTAL TECHNOLOGY, INC.**  
**ENVIRONMENTAL CONSULTANTS**  
620 Apollo Road  
Scott, LA 70583  
(337) 261-1963





**Well Serial  
Spud Date**

Explanation	
	HET Proposed Delineation Soil Borings (SN240037)
	Approximate Property Boundary (Approach)
	HET Monitor Well Locations
	HET Boring Locations
	Approach Monitor Well Locations
	Approach Boring Locations
	Approximate Reserve Pit Locations (Approach)
	Gas Well - Serial Number/Spud Date

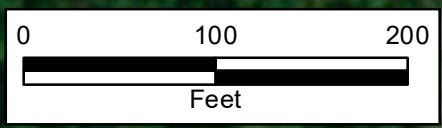


Figure 240037. HET proposed delineation soil borings on and adjacent to Well Pad-240037 on the Gamble property located near Longstreet, DeSoto Parish, Louisiana. Base Map: 2022 ESRI Aerial

DJB Drawn By	BTP Approved By	8070.00 Project No.	06/13/2023 Date
-----------------	--------------------	------------------------	--------------------

**HYDRO-ENVIRONMENTAL TECHNOLOGY, INC.**  
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Scott, LA 70583  
(337) 261-1963



## Brent T. Pooler

---

**From:** Scott C. Sinclair <ssinclair@sinclair-law.com>  
**Sent:** Monday, June 19, 2023 12:56 PM  
**To:** Stewart L. Stover; Wade A. Pigott; Brent T. Pooler  
**Cc:** Craig Isenberg; Taylor L. Gamm  
**Subject:** FW: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Guys:

Here is a comment from DNR on boring locations for 240035. I have not pulled the maps out to determine what adjustment should be made. Will you review and advise?

Thanks.

SCS

---

**From:** Claudia Rush (DNR) <Claudia.Rush4@la.gov>  
**Sent:** Monday, June 19, 2023 12:42 PM  
**To:** Scott C. Sinclair <ssinclair@sinclair-law.com>; 'Gladstone Jones' <GJones@jonesswanson.com>; Jonathan Rice <Jonathan.Rice@la.gov>  
**Cc:** 'Kevin Huddell' <KHuddell@jonesswanson.com>; 'Edwin Hightower' <ehightower@adminlaw.la.gov>; Jamie Love (DNR) <Jamie.Love@la.gov>; Houston Holley <Houston.Holley@LA.GOV>; 'Bernard Boudreaux' <BBoudreaux@jonesswanson.com>; Gavin Broussard <Gavin.Broussard@la.gov>; 'OAL Processing' <OALProcessing@adminlaw.la.gov>; 'Cheryl Berner' <CBerner@jonesswanson.com>; 'Taylor Townsend' <taylor@taylortownsendlaw.com>; 'Craig Isenberg' <cisenberg@barrassousdin.com>; swebre@barrassousdin.com; 'Alan Ezkovich' <alan.ezkovich@ezkovichlaw.com>; 'Lynn Swanson' <LSwanson@jonesswanson.com>; john.king@bswllp.com; 'Taylor L. Gamm' <tgamm@barrassousdin.com>; dluder@barrassousdin.com; 'Jude C. Bursavich' <jude.bursavich@bswllp.com>; 'Michael Arata' <MArata@jonesswanson.com>; 'John Arnold' <JArnold@jonesswanson.com>; 'Alayne Gobeille' <agobeille@jonesswanson.com>; 'Tom Dixon' <tdixon@jonesswanson.com>; 'Rosa Acheson' <RAcheson@jonesswanson.com>; Monique Edwards (DNR) <Monique.Edwards@la.gov>  
**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Good Morning Mr. Sinclair,

Our technical people have looked over your most recent sampling plan and have so far found it acceptable, except for well 240035. Their comments with regards to 240035 is that “***There should be a sample to delineate SB-1/1R to the SW. The sample at SB-2 would be sufficient for delineation of SB-1/1R in the SE.***” If you have any more questions, please feel free to contact Jonathan or me.



**Claudia I Rush**  
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---

**From:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>

**Sent:** Friday, June 16, 2023 9:29 AM

**To:** Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; Gladstone Jones' <[GJones@joneswanson.com](mailto:GJones@joneswanson.com)>; Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

**Cc:** 'Kevin Huddell' <[KHuddell@joneswanson.com](mailto:KHuddell@joneswanson.com)>; 'Edwin Hightower' <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>; Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; 'Bernard Boudreaux' <[BBoudreaux@joneswanson.com](mailto:BBoudreaux@joneswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; 'OAL Processing' <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; 'Cheryl Berner' <[CBerner@joneswanson.com](mailto:CBerner@joneswanson.com)>; 'Taylor Townsend' <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; 'Craig Isenberg' <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); 'Alan Ezkovich' <[alan.ezkovich@ezkovichlaw.com](mailto:alan.ezkovich@ezkovichlaw.com)>; 'Lynn Swanson' <[LSwanson@joneswanson.com](mailto:LSwanson@joneswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); 'Taylor L. Gamm' <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); 'Jude C. Bursavich' <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; 'Michael Arata' <[MArata@joneswanson.com](mailto:MArata@joneswanson.com)>; 'John Arnold' <[JArnold@joneswanson.com](mailto:JArnold@joneswanson.com)>; 'Alayne Gobeille' <[agobeille@joneswanson.com](mailto:agobeille@joneswanson.com)>; 'Tom Dixon' <[tdixon@joneswanson.com](mailto:tdixon@joneswanson.com)>; 'Rosa Acheson' <[RAcheson@joneswanson.com](mailto:RAcheson@joneswanson.com)>; Monique Edwards (DNR) <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>

**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

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Good morning, Jonathan and Claudia:

I am following up on this to see if the technical team has any comments or questions regarding our planned sampling, which will start on Monday.

Let us know. Thanks.

Scott C. Sinclair

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Shreveport, LA 71163-1026  
(318) 562-3700  
[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)

---

**From:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>  
**Sent:** Wednesday, June 14, 2023 1:53 PM  
**To:** 'Claudia Rush (DNR)' <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; 'Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; 'Jonathan Rice' <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>  
**Cc:** 'Kevin Huddell' <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; 'Edwin Hightower' <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>; 'Jamie Love (DNR)' <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; 'Houston Holley' <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; 'Bernard Boudreaux' <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; 'Gavin Broussard' <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; 'OAL Processing' <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; 'Cheryl Berner' <[CBerner@jonesswanson.com](mailto:CBerner@jonesswanson.com)>; 'Taylor Townsend' <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; 'Craig Isenberg' <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; 'swebre@barrassousdin.com' <[swebre@barrassousdin.com](mailto:swebre@barrassousdin.com)>; 'Alan Ezkovich' <[alan.ezkovich@ezkovichlaw.com](mailto:alan.ezkovich@ezkovichlaw.com)>; 'Lynn Swanson' <[LSwanson@jonesswanson.com](mailto:LSwanson@jonesswanson.com)>; 'john.king@bswllp.com' <[john.king@bswllp.com](mailto:john.king@bswllp.com)>; 'Taylor L. Gamm' <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; 'dluder@barrassousdin.com' <[dluder@barrassousdin.com](mailto:dluder@barrassousdin.com)>; 'Jude C. Bursavich' <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; 'Michael Arata' <[MArata@jonesswanson.com](mailto:MArata@jonesswanson.com)>; 'John Arnold' <[JArnold@jonesswanson.com](mailto:JArnold@jonesswanson.com)>; 'Alayne Gobeille' <[agobeille@jonesswanson.com](mailto:agobeille@jonesswanson.com)>; 'Tom Dixon' <[tdixon@jonesswanson.com](mailto:tdixon@jonesswanson.com)>; 'Rosa Acheson' <[RAcheson@jonesswanson.com](mailto:RAcheson@jonesswanson.com)>; 'Monique Edwards (DNR)' <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>  
**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Jonathan and Claudia:

Thank you for the clarification that the only constituent for delineation is total Barium. That is how we understood the previous communications, but we appreciate you clarifying it.

Indigo Minerals reserves all substantive and procedural rights with respect to this entire matter. Nevertheless, as we have said previously, we will work cooperatively with the Commission to obtain additional information and we are committed to working with your office to obtain that information in a timely fashion so that the panel can timely formulate a final plan and so that Indigo's substantive and procedural rights to present that plan to the jury are preserved.

Regarding the Barium delineation, attached are maps showing the proposed sampling locations. Please share this information with the technical team and let us know if they have any comments or questions. Our plan is to begin this work on Monday, June 19. We also plan to request the lab to provide the Barium results on an expedited basis.

We look forward to hearing from you.

Scott C. Sinclair

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---

**From:** Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>

**Sent:** Monday, June 12, 2023 5:02 PM

**To:** Gladstone Jones <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

**Cc:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>; Kevin Huddell <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; Edwin Hightower <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>; Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; Bernard Boudreaux <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; OAL Processing <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; Cheryl Berner <[CBerner@jonesswanson.com](mailto:CBerner@jonesswanson.com)>; Taylor Townsend <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; Craig Isenberg <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); Alan Ezkovich <[alan.ezkovich@ezkovichlaw.com](mailto:alan.ezkovich@ezkovichlaw.com)>; Lynn Swanson <[LSwanson@jonesswanson.com](mailto:LSwanson@jonesswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); Taylor L. Gamm <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); Jude C. Bursavich <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; Michael Arata <[MArata@jonesswanson.com](mailto:MArata@jonesswanson.com)>; John Arnold <[JArnold@jonesswanson.com](mailto:JArnold@jonesswanson.com)>; Alayne Gobeille <[agobeille@jonesswanson.com](mailto:agobeille@jonesswanson.com)>; Tom Dixon <[tdixon@jonesswanson.com](mailto:tdixon@jonesswanson.com)>; Rosa Acheson <[RAcheson@jonesswanson.com](mailto:RAcheson@jonesswanson.com)>; Monique Edwards (DNR) <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>

**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Good afternoon Mr. Jones,

After reviewing your email, we would like to clarify a certain point. The June 6<sup>th</sup> email, which was sent to both parties, is a clarification of the June 2<sup>nd</sup> email. As part of our review we need a delineation of the onsite **total Barium** only. Our technical team has not requested nor needs a delineation of any other constituents.

Sincerely,  
Claudia Rush



**Claudia I Rush**

Attorney  
Office of Conservation

**Department of Natural Resources**

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LaSalle Building  
617 North Third Street  
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This e-mail (including any attachments) is covered by the Electronic Communications Privacy Act, U.S.C. Sections 2510-2521, is confidential, and is legally privileged. This message and its attachments may also be privileged and attorney work product. They are intended for the individual or entity named above. If you are not the intended recipient, please do not read, copy, use or disclose this communication to others. You are hereby noticed that any dissemination, distribution or copy of this

communication is strictly prohibited. If you have received this communication in error, please notify me immediately by responsive e-mail.

---

**From:** Gladstone Jones <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>

**Sent:** Monday, June 12, 2023 11:48 AM

**To:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

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**Subject:** Re: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Scott,

To be clear, we need to discuss whether Indigo would be conducting sampling as requested by DNR and the sampling I was referring to was that set forth in the June 2nd correspondence and the June 6th email from Mr Rice. You only mentioned the June 2nd letter but in order for us to plan for our client we we need confirmation Indigo will be following the direction of the DNR as set forth in the latter June 6th email from Mr Rice. So we are all on the same page I have copied that here:

1. A picture of the well and affidavit by both parties confirming that the picture is an accurate representation that that there is not well present.
2. Provide cross sections, including all available data (rig supply wells and EB borings).
3. Hypothetical plan must include the following missing information: a text description of the plan and what methodology would be performed for each well.
4. SN 239274: Provide samples for locations to the north, east and west of SB-2.

5. SN 239592: Provide a delineation to the east and north and SPLP for SB-2/2R (8-10) at the depth of 8-10 ft. bgs.
6. SN 240035: Provide delineation from east, south, and west for sample SB1/1R at the depth of 8-10 ft bgs. Provide delineation samples for north, east, and west of this location for SB-3 at the depth of 0-2 ft bgs. MW-1 at 8-12 ft bgs should be sampled above and below for delineation. Horizontally it should be delineated at the highest exceedance for barium.
7. SN 240037: More samples needed for these areas: SB-1/1R at the depth of 0-2 ft bgs should be horizontally delineated. SB-2/2R at the depth of 8-10 ft bgs should be sampled above and below for barium.
8. Please provide all data in the tables in the same units as required by – RECAP Section 2.5 & LAC 43:XIX.611.F.
9. It is noted that Indigo's June 6<sup>th</sup> letter provides the intended future use of the property.
10. According to RECAP Section 2.4 and LAC 43:XIX.611.F, 1 matrix spike/matrix spike duplicate from the site per 20 field samples shall be provided.

Please confirm.

Also, Indigo and the Gamble family should be clear with DNR that the intended use of this property is clearly provided for in the lease between Indigo and Gamble LLC which specifically states that this property is a rural residence, tree farm and management area. I look forward to chatting at 3pm. Best, Glad

Sent from my iPhone

On Jun 12, 2023, at 11:35 AM, Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)> wrote:

Conservation will be available at 3 p.m. today.

Best regards,

F. Jonathan Rice, Attorney  
LDNR / Office of Conservation  
Phone: (225) 342-9660

Fax: (225) 342-3705  
[Jonathan.rice@la.gov](mailto:Jonathan.rice@la.gov)

---

**From:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>  
**Sent:** Monday, June 12, 2023 11:26 AM  
**To:** 'Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>  
**Cc:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>; 'Kevin Huddell' <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; 'Edwin Hightower' <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>; Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; 'Bernard Boudreaux' <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; 'OAL Processing' <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; 'Cheryl Berner' <[CBerner@jonesswanson.com](mailto:CBerner@jonesswanson.com)>; 'Taylor Townsend' <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; 'Craig Isenberg' <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); 'Alan Ezkovich' <[alan.ezkovich@ezkovichlaw.com](mailto:alan.ezkovich@ezkovichlaw.com)>; 'Lynn Swanson' <[LSwanson@jonesswanson.com](mailto:LSwanson@jonesswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); 'Taylor L. Gamm' <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); 'Jude C. Bursavich' <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; 'Michael Arata' <[MArata@jonesswanson.com](mailto:MArata@jonesswanson.com)>; 'John Arnold' <[JArnold@jonesswanson.com](mailto:JArnold@jonesswanson.com)>; 'Alayne Gobeille' <[agobeille@jonesswanson.com](mailto:agobeille@jonesswanson.com)>; 'Tom Dixon' <[tdixon@jonesswanson.com](mailto:tdixon@jonesswanson.com)>; 'Rosa Acheson' <[RAcheson@jonesswanson.com](mailto:RAcheson@jonesswanson.com)>; Monique Edwards (DNR) <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>  
**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Glad:

In response to your question, Indigo's current intention is to collect the additional samples at the locations and for the parameters specified in the Commissioner's June 2 letter. Craig and I are available for a call with you and your team at 3:00 this afternoon. Let us know if that time is good for you, and we will send a calendar invite.

Thanks.

Scott C. Sinclair

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**From:** Gladstone Jones <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>  
**Sent:** Monday, June 12, 2023 11:04 AM  
**To:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>  
**Cc:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>; Kevin Huddell <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; Edwin Hightower <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>; Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@la.gov](mailto:Houston.Holley@la.gov)>; Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; Bernard Boudreaux <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; OAL Processing

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**Subject:** Re: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Jonathan,

Thank you to all. We will be reaching out to discuss scheduling with counsel for Indigo. We of course will want time to respond to any modified plan submitted by Indigo. A question that we need answered is whether Indigo will be sampling the pit areas as set forth in the June 6th correspondence? That may very well impact the time we will need to respond and whether we can do that inside the 30 days contemplated for a response by the landowner. Scott - please let us know the answer to this question and then we can arrange a call. We are available today or tomorrow. Thank you. Glad.

Sent from my iPhone

On Jun 12, 2023, at 10:59 AM, Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)> wrote:

Thank you, Mr. Rice.

Kevin, can you advise whether Gamble LLC has any objection to resetting the limited admission hearing for July 18-20? Those dates work for DNR and for Indigo.

Thanks.

Scott C. Sinclair

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**From:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

**Sent:** Monday, June 12, 2023 10:55 AM

**To:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>; 'Kevin Huddell'

<[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; 'Edwin Hightower' <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>

**Cc:** Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley

<[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; 'Bernard Boudreaux' <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; 'OAL Processing' <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; 'Cheryl Berner' <[CBerner@jonesswanson.com](mailto:CBerner@jonesswanson.com)>; 'Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; 'Taylor Townsend' <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; 'Craig Isenberg' <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); 'Alan Ezkovich' <[Alan.Ezkovich@ezkovichlaw.com](mailto:Alan.Ezkovich@ezkovichlaw.com)>; 'Lynn Swanson' <[LSwanson@jonesswanson.com](mailto:LSwanson@jonesswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); 'Taylor L. Gamm' <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); 'Jude C. Bursavich' <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; 'Michael Arata' <[MArata@jonesswanson.com](mailto:MArata@jonesswanson.com)>; 'John Arnold' <[JArnold@jonesswanson.com](mailto:JArnold@jonesswanson.com)>; 'Alayne Gobeille' <[agobeille@jonesswanson.com](mailto:agobeille@jonesswanson.com)>; 'Tom Dixon' <[tdixon@jonesswanson.com](mailto:tdixon@jonesswanson.com)>; 'Rosa Acheson' <[RAcheson@jonesswanson.com](mailto:RAcheson@jonesswanson.com)>; Monique Edwards (DNR) <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>

**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Mr. Sinclair:

The July 18-20 dates are good with Conservation. Have you received a response from Mr. Huddell regarding the landowner's thoughts?

Best regards,

F. Jonathan Rice, Attorney  
LDNR / Office of Conservation  
Phone: (225) 342-9660  
Fax: (225) 342-3705  
[Jonathan.rice@la.gov](mailto:Jonathan.rice@la.gov)

---

**From:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>

**Sent:** Friday, June 9, 2023 3:40 PM

**To:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>; 'Kevin Huddell' <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; 'Edwin Hightower' <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>

**Cc:** Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; 'Bernard Boudreaux' <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; 'OAL Processing' <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; 'Cheryl Berner' <[CBerner@jonesswanson.com](mailto:CBerner@jonesswanson.com)>; 'Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; 'Taylor Townsend' <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; 'Craig Isenberg' <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); 'Alan Ezkovich' <[Alan.Ezkovich@ezkovichlaw.com](mailto:Alan.Ezkovich@ezkovichlaw.com)>; 'Lynn Swanson' <[LSwanson@jonesswanson.com](mailto:LSwanson@jonesswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); 'Taylor L. Gamm' <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); 'Jude C. Bursavich' <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; 'Michael Arata' <[MArata@jonesswanson.com](mailto:MArata@jonesswanson.com)>; 'John Arnold' <[JArnold@jonesswanson.com](mailto:JArnold@jonesswanson.com)>; 'Alayne Gobeille' <[agobeille@jonesswanson.com](mailto:agobeille@jonesswanson.com)>; 'Tom Dixon' <[tdixon@jonesswanson.com](mailto:tdixon@jonesswanson.com)>; 'Rosa Acheson' <[RAcheson@jonesswanson.com](mailto:RAcheson@jonesswanson.com)>; Monique Edwards (DNR) <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>

**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

**EXTERNAL EMAIL:** Please do not click on links or attachments unless you know the content is safe.

Mr. Rice:

As you know, Indigo Minerals firmly believes the proposed plan that it submitted is compliant with the requirements of Statewide Order 29B. You also know that, consistent with its position, Indigo Minerals has filed a motion in the underlying civil proceeding seeking an order compelling the Department to proceed with the limited admission hearing. Indigo Minerals reserves all rights with respect to these matters.

Nevertheless, we appreciate the expression in your email of a willingness to reset the hearing on an expedited basis with the understanding that DNR will be able to render a final plan in sufficient time prior to our trial set on October 23, 2023. By July 7, we can provide additional information and can further respond to the Commissioner's June 2 letter and your email below. That would allow us to reset the hearing for July 18 – 20. In turn, that would allow the Department to issue its most feasible plan no later than September 18.

Please confirm that July 18-20 are good dates for the panel.

To facilitate these schedule changes, we will submit for your review a joint motion to DAL to reset the limited admission hearing for July 18 and a joint motion to the DeSoto Parish court for additional time pursuant to R.S. 30:29.

Thank you.

Scott C. Sinclair

Sinclair Law Firm  
PO Box 1026  
Shreveport, LA 71163-1026  
(318) 562-3700  
[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)

---

**From:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>  
**Sent:** Tuesday, June 6, 2023 5:23 PM  
**To:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>; 'Kevin Huddell' <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; 'Edwin Hightower' <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>  
**Cc:** Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; 'Bernard Boudreaux' <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; 'OAL Processing' <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; 'Cheryl Berner' <[CBerner@jonesswanson.com](mailto:CBerner@jonesswanson.com)>; 'Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; 'Taylor Townsend' <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; 'Craig Isenberg' <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); 'Alan Ezkovich' <[Alan.Ezkovich@ezkovichlaw.com](mailto:Alan.Ezkovich@ezkovichlaw.com)>; 'Lynn Swanson' <[LSwanson@jonesswanson.com](mailto:LSwanson@jonesswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); 'Taylor L. Gamm'



<[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); 'Jude C. Bursavich' <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; 'Michael Arata' <[MArata@jonesswanson.com](mailto:MArata@jonesswanson.com)>; 'John Arnold' <[JArnold@jonesswanson.com](mailto:JArnold@jonesswanson.com)>; 'Alayne Gobeille' <[agobeille@jonesswanson.com](mailto:agobeille@jonesswanson.com)>; 'Tom Dixon' <[tdixon@jonesswanson.com](mailto:tdixon@jonesswanson.com)>; 'Rosa Acheson' <[RAcheson@jonesswanson.com](mailto:RAcheson@jonesswanson.com)>; Monique Edwards (DNR) <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>; Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

**Subject:** 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Mr. Sinclair:

The Division of Administrative Law has continued this matter in light of the Office of Conservations June 2<sup>nd</sup> letter sent to your office. We are again requesting that Indigo move for a continuance (on behalf of the DNR/OC) by tomorrow, June 7, 2023, so a Statewide Order 29B compliant plan can be submitted to this Office for review.

Again, please see the reasons set forth in Conservation's June 2<sup>nd</sup> letter; and furthermore, please see the reasons and responses (to your June 6<sup>th</sup> letter to the Commissioner) set forth below.

1. A picture of the well and affidavit by both parties confirming that the picture is an accurate representation that that there is not well present.
2. Provide cross sections, including all available data (rig supply wells and EB borings).
3. Hypothetical plan must include the following missing information: a text description of the plan and what methodology would be performed for each well.
4. SN 239274: Provide samples for locations to the north, east and west of SB-2.
5. SN 239592: Provide a delineation to the east and north and SPLP for SB-2/2R (8-10) at the depth of 8-10 ft. bgs.
6. SN 240035: Provide delineation from east, south, and west for sample SB1/1R at the depth of 8-10 ft bgs. Provide delineation samples for north, east, and west of this location for SB-3 at the depth of 0-2 ft bgs. MW-1 at 8-12 ft bgs should be sampled above and below for delineation. Horizontally it should be delineated at the highest exceedance for barium.
7. SN 240037: More samples needed for these areas: SB-1/1R at the depth of 0-2 ft bgs should be horizontally delineated. SB-2/2R at the depth of 8-10 ft bgs should be sampled above and below for barium.
8. Please provide all data in the tables in the same units as required by – RECAP Section 2.5 & LAC 43:XIX.611.F.
9. It is noted that Indigo's June 6<sup>th</sup> letter provides the intended future use of the property.
10. According to RECAP Section 2.4 and LAC 43:XIX.611.F, 1 matrix spike/matrix spike duplicate from the site per 20 field samples shall be provided.

The sooner your client provides the necessary requested information for a compliant plan, the sooner Conservation can reset the Administrative Hearing to provide sufficient time prior to your trial set in October 23, 2023. Please notify Conservation if Indigo does not intend to file a Continuance on DNR//OC's behalf. Thank you for your time and attention to this matter.

Best regards,

**F. Jonathan Rice, Attorney**  
**LDNR / Office of Conservation**  
**Executive Division**  
**P.O. Box 94275**  
**Baton Rouge, LA 70804-9275**  
**Phone: (225) 342-9660**  
**Fax: (225) 342-3705**  
[Jonathan.rice@la.gov](mailto:Jonathan.rice@la.gov)

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## Brent T. Pooler

---

**From:** Scott C. Sinclair <ssinclair@sinclair-law.com>  
**Sent:** Monday, June 19, 2023 4:09 PM  
**To:** Stewart L. Stover; Wade A. Pigott; Brent T. Pooler  
**Cc:** Craig Isenberg; Taylor L. Gamm  
**Subject:** FW: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

FYI. I think this is good. But I read it fast.

Wade, Brent, what is your reaction?

SCS

---

**From:** Claudia Rush (DNR) <Claudia.Rush4@la.gov>  
**Sent:** Monday, June 19, 2023 4:05 PM  
**To:** Scott C. Sinclair <ssinclair@sinclair-law.com>; Jonathan Rice <Jonathan.Rice@la.gov>  
**Cc:** Gavin Broussard <Gavin.Broussard@la.gov>; Jamie Love (DNR) <Jamie.Love@la.gov>  
**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Hi Mr. Sinclair,

With regards to the question you posed our technical team on Friday,

**“ According to RECAP Section 2.4 and LAC 43:XIX.611.F, 1 matrix spike/matrix spike duplicate from the site per 20 field samples shall be provided.**

Samples collected during HET’s involvement in the investigation of the Gamble property were subject to appropriate quality control requirements, including sufficient MS/MSD sample results to meet the requirements per RECAP. Each sample was split in the field and sent to a minimum of two (2) separate laboratories each by Approach and HET. For completeness purposes, the entire data set of laboratory reports associated with samples collected by HET in the field has been uploaded to the following link, which also segregates the MS/MSD analyses in each report. All of the information included in the link was also included with the proposed plan.

OneDrive link to [Gamble Labs](#)

Again, we believe that the MS/MSD information included with the proposed plan documentation is sufficient.

If DNR determines that it wants additional MS/MSD information, please provide specific advice as to what is being requested. Should additional MS/MSD samples be requested, HET can do so during the upcoming sampling event scheduled to begin on June 19, 2023. “

The following is their response:

MS/MSD should be taken on field samples. The lab runs their own, as part of their own QA/QC process, this is not the same as field sample run MS/MSD. Noting that there are split samples from 2 different labs, for most of the same parameters, our office can justify the absence of field MS/MSD samples at this time.

Please let us know if you have any further questions.



**Claudia I Rush**  
Attorney  
Office of Conservation

**Department of Natural Resources**  
Post Office Box 94275  
LaSalle Building  
617 North Third Street  
Baton Rouge, LA 70804  
Phone: 225-342-5510  
Email: [claudia.rush4@la.gov](mailto:claudia.rush4@la.gov)

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---

**From:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>

**Sent:** Friday, June 16, 2023 5:01 PM

**To:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>; Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>

**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

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Jonathan and Claudia:

Please see the attached with respect to item 10 below. Will you forward this to the technical team and let us know if they have a response?

Thank you.

Scott C. Sinclair

Sinclair Law Firm  
PO Box 1026  
Shreveport, LA 71163-1026  
(318) 562-3700

---

**From:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

**Sent:** Tuesday, June 6, 2023 5:23 PM

**To:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>; 'Kevin Huddell' <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; 'Edwin Hightower' <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>

**Cc:** Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; 'Bernard Boudreaux' <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; 'OAL Processing' <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; 'Cheryl Berner' <[CBerner@jonesswanson.com](mailto:CBerner@jonesswanson.com)>; 'Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; 'Taylor Townsend' <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; 'Craig Isenberg' <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); 'Alan Ezkovich' <[Alan.Ezkovich@ezkovichlaw.com](mailto:Alan.Ezkovich@ezkovichlaw.com)>; 'Lynn Swanson' <[LSwanson@jonesswanson.com](mailto:LSwanson@jonesswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); 'Taylor L. Gamm' <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); 'Jude C. Bursavich' <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; 'Michael Arata' <[MArata@jonesswanson.com](mailto:MArata@jonesswanson.com)>; 'John Arnold' <[JArnold@jonesswanson.com](mailto:JArnold@jonesswanson.com)>; 'Alayne Gobeille' <[agobeille@jonesswanson.com](mailto:agobeille@jonesswanson.com)>; 'Tom Dixon' <[tdixon@jonesswanson.com](mailto:tdixon@jonesswanson.com)>; 'Rosa Acheson' <[RAcheson@jonesswanson.com](mailto:RAcheson@jonesswanson.com)>; Monique Edwards (DNR) <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>; Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

**Subject:** 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Mr. Sinclair:

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Again, please see the reasons set forth in Conservation's June 2<sup>nd</sup> letter; and furthermore, please see the reasons and responses (to your June 6<sup>th</sup> letter to the Commissioner) set forth below.

1. A picture of the well and affidavit by both parties confirming that the picture is an accurate representation that that there is not well present.
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7. SN 240037: More samples needed for these areas: SB-1/1R at the depth of 0-2 ft bgs should be horizontally delineated. SB-2/2R at the depth of 8-10 ft bgs should be sampled above and below for barium.
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9. It is noted that Indigo's June 6<sup>th</sup> letter provides the intended future use of the property.

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Best regards,

F. Jonathan Rice, Attorney  
LDNR / Office of Conservation  
Executive Division  
P.O. Box 94275  
Baton Rouge, LA 70804-9275  
Phone: (225) 342-9660  
Fax: (225) 342-3705  
[Jonathan.rice@la.gov](mailto:Jonathan.rice@la.gov)

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## Brent T. Pooler

---

**From:** Scott C. Sinclair <ssinclair@sinclair-law.com>  
**Sent:** Monday, June 19, 2023 4:07 PM  
**To:** Stewart L. Stover; Wade A. Pigott; Brent T. Pooler  
**Cc:** Craig Isenberg; Taylor L. Gamm  
**Subject:** FW: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

FYI.

SCS

---

**From:** Claudia Rush (DNR) <Claudia.Rush4@la.gov>  
**Sent:** Monday, June 19, 2023 3:57 PM  
**To:** Scott C. Sinclair <ssinclair@sinclair-law.com>; 'Gladstone Jones' <GJones@jonesswanson.com>; Jonathan Rice <Jonathan.Rice@la.gov>  
**Cc:** 'Kevin Huddell' <KHuddell@jonesswanson.com>; 'Edwin Hightower' <ehightower@adminlaw.la.gov>; Jamie Love (DNR) <Jamie.Love@la.gov>; Houston Holley <Houston.Holley@LA.GOV>; 'Bernard Boudreaux' <BBoudreaux@jonesswanson.com>; Gavin Broussard <Gavin.Broussard@la.gov>; 'OAL Processing' <OALProcessing@adminlaw.la.gov>; 'Cheryl Berner' <CBerner@jonesswanson.com>; 'Taylor Townsend' <taylor@taylortownsendlaw.com>; 'Craig Isenberg' <cisenberg@barrassousdin.com>; swebre@barrassousdin.com; 'Alan Ezkovich' <alan.ezkovich@ezkovichlaw.com>; 'Lynn Swanson' <LSwanson@jonesswanson.com>; john.king@bswllp.com; 'Taylor L. Gamm' <tgamma@barrassousdin.com>; dluder@barrassousdin.com; 'Jude C. Bursavich' <jude.bursavich@bswllp.com>; 'Michael Arata' <MArata@jonesswanson.com>; 'John Arnold' <JArnold@jonesswanson.com>; 'Alayne Gobeille' <agobeille@jonesswanson.com>; 'Tom Dixon' <tdixon@jonesswanson.com>; 'Rosa Acheson' <RAcheson@jonesswanson.com>; Monique Edwards (DNR) <Monique.Edwards@la.gov>  
**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Hi Mr. Sinclair,

The panel has no objection to the updated delineation map you just sent us.



**Claudia I Rush**  
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Office of Conservation

**Department of Natural Resources**  
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**From:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>

**Sent:** Monday, June 19, 2023 2:42 PM

**To:** Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; 'Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

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**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

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Claudia:

Here is the revised boring location map for 240035. The additional boring to the SW of SB-1 is labeled PB-4. Let us know if the technical team has any other comments.

Scott C. Sinclair

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---

**From:** Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>

**Sent:** Monday, June 19, 2023 12:42 PM

**To:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>; 'Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

**Cc:** 'Kevin Huddell' <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; 'Edwin Hightower' <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>; Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; 'Bernard Boudreaux' <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; 'OAL Processing'

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**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Good Morning Mr. Sinclair,

Our technical people have looked over your most recent sampling plan and have so far found it acceptable, except for well 240035. Their comments with regards to 240035 is that “***There should be a sample to delineate SB-1/1R to the SW. The sample at SB-2 would be sufficient for delineation of SB-1/1R in the SE.***” If you have any more questions, please feel free to contact Jonathan or me.



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**From:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>

**Sent:** Friday, June 16, 2023 9:29 AM

**To:** Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

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**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

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Good morning, Jonathan and Claudia:

I am following up on this to see if the technical team has any comments or questions regarding our planned sampling, which will start on Monday.

Let us know. Thanks.

Scott C. Sinclair

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**From:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>

**Sent:** Wednesday, June 14, 2023 1:53 PM

**To:** 'Claudia Rush (DNR)' <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; 'Gladstone Jones' <[GJones@joneesswanson.com](mailto:GJones@joneesswanson.com)>; 'Jonathan Rice' <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

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**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Jonathan and Claudia:

Thank you for the clarification that the only constituent for delineation is total Barium. That is how we understood the previous communications, but we appreciate you clarifying it.

Indigo Minerals reserves all substantive and procedural rights with respect to this entire matter. Nevertheless, as we have said previously, we will work cooperatively with the Commission to obtain additional information and we are committed to working with your office to obtain that information in a timely fashion so that the panel can timely formulate a final plan and so that Indigo's substantive and procedural rights to present that plan to the jury are preserved.

Regarding the Barium delineation, attached are maps showing the proposed sampling locations. Please share this information with the technical team and let us know if they have any comments or questions. Our plan is to begin this work on Monday, June 19. We also plan to request the lab to provide the Barium results on an expedited basis.

We look forward to hearing from you.

Scott C. Sinclair

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**From:** Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>

**Sent:** Monday, June 12, 2023 5:02 PM

**To:** Gladstone Jones <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

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**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Good afternoon Mr. Jones,

After reviewing your email, we would like to clarify a certain point. The June 6<sup>th</sup> email, which was sent to both parties, is a clarification of the June 2<sup>nd</sup> email. As part of our review we need a delineation of the onsite **total Barium** only. Our technical team has not requested nor needs a delineation of any other constituents.

Sincerely,  
Claudia Rush





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**From:** Gladstone Jones <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>

**Sent:** Monday, June 12, 2023 11:48 AM

**To:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>

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**Subject:** Re: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

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Scott,

To be clear, we need to discuss whether Indigo would be conducting sampling as requested by DNR and the sampling I was referring to was that set forth in the June 2nd correspondence and the June 6th email from Mr Rice. You only mentioned the June 2nd letter but in order for us to plan for our client we need confirmation Indigo will be following the direction of the DNR as set forth in the latter June 6th email from Mr Rice. So we are all on the same page I have copied that here:

1. A picture of the well and affidavit by both parties confirming that the picture is an accurate representation that that there is not well present.
2. Provide cross sections, including all available data (rig supply wells and EB borings).
3. Hypothetical plan must include the following missing information: a text description of the plan and what methodology would be performed for each well.
4. SN 239274: Provide samples for locations to the north, east and west of SB-2.
5. SN 239592: Provide a delineation to the east and north and SPLP for SB-2/2R (8-10) at the depth of 8-10 ft. bgs.
6. SN 240035: Provide delineation from east, south, and west for sample SB1/1R at the depth of 8-10 ft bgs. Provide delineation samples for north, east, and west of this location for SB-3 at the depth of 0-2 ft bgs. MW-1 at 8-12 ft bgs should be sampled above and below for delineation. Horizontally it should be delineated at the highest exceedance for barium.
7. SN 240037: More samples needed for these areas: SB-1/1R at the depth of 0-2 ft bgs should be horizontally delineated. SB-2/2R at the depth of 8-10 ft bgs should be sampled above and below for barium.
8. Please provide all data in the tables in the same units as required by – RECAP Section 2.5 & LAC 43:XIX.611.F.
9. It is noted that Indigo's June 6<sup>th</sup> letter provides the intended future use of the property.
10. According to RECAP Section 2.4 and LAC 43:XIX.611.F, 1 matrix spike/matrix spike duplicate from the site per 20 field samples shall be provided.

Please confirm.

Also, Indigo and the Gamble family should be clear with DNR that the intended use of this property is clearly provided for in the lease between Indigo and Gamble LLC which specifically states that this property is a rural residence, tree farm and management area. I look forward to chatting at 3pm. Best, Glad

Sent from my iPhone

On Jun 12, 2023, at 11:35 AM, Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)> wrote:

Conservation will be available at 3 p.m. today.

Best regards,

F. Jonathan Rice, Attorney  
LDNR / Office of Conservation  
Phone: (225) 342-9660  
Fax: (225) 342-3705  
[Jonathan.rice@la.gov](mailto:Jonathan.rice@la.gov)

---

**From:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>  
**Sent:** Monday, June 12, 2023 11:26 AM  
**To:** 'Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>  
**Cc:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>; 'Kevin Huddell' <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; 'Edwin Hightower' <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>; 'Jamie Love (DNR)' <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; 'Houston Holley' <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; 'Claudia Rush (DNR)' <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; 'Bernard Boudreaux' <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; 'Gavin Broussard' <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; 'OAL Processing' <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; 'Cheryl Berner' <[CBerner@jonesswanson.com](mailto:CBerner@jonesswanson.com)>; 'Taylor Townsend' <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; 'Craig Isenberg' <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); 'Alan Ezkovich' <[alan.ezkovich@ezkovichlaw.com](mailto:alan.ezkovich@ezkovichlaw.com)>; 'Lynn Swanson' <[LSwanson@jonesswanson.com](mailto:LSwanson@jonesswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); 'Taylor L. Gamm' <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); 'Jude C. Bursavich' <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; 'Michael Arata' <[MArata@jonesswanson.com](mailto:MArata@jonesswanson.com)>; 'John Arnold' <[JArnold@jonesswanson.com](mailto:JArnold@jonesswanson.com)>; 'Alayne Gobeille' <[agobeille@jonesswanson.com](mailto:agobeille@jonesswanson.com)>; 'Tom Dixon' <[tdixon@jonesswanson.com](mailto:tdixon@jonesswanson.com)>; 'Rosa Acheson' <[RAcheson@jonesswanson.com](mailto:RAcheson@jonesswanson.com)>; 'Monique Edwards (DNR)' <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>  
**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

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Glad:

In response to your question, Indigo's current intention is to collect the additional samples at the locations and for the parameters specified in the Commissioner's June 2 letter. Craig and I are available for a call with you and your team at 3:00 this afternoon. Let us know if that time is good for you, and we will send a calendar invite.

Thanks.

Scott C. Sinclair

Sinclair Law Firm  
PO Box 1026  
Shreveport, LA 71163-1026  
(318) 562-3700  
[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)

---

**From:** Gladstone Jones <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>  
**Sent:** Monday, June 12, 2023 11:04 AM  
**To:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>  
**Cc:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>; Kevin Huddell <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; Edwin Hightower <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>; Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@la.gov](mailto:Houston.Holley@la.gov)>; Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; Bernard Boudreaux <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; OAL Processing <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; Cheryl Berner <[CBerner@jonesswanson.com](mailto:CBerner@jonesswanson.com)>; Taylor Townsend <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; Craig Isenberg <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); Alan Ezkovich <[alan.ezkovich@ezkovichlaw.com](mailto:alan.ezkovich@ezkovichlaw.com)>; Lynn Swanson <[LSwanson@jonesswanson.com](mailto:LSwanson@jonesswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); Taylor L. Gamm <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); Jude C. Bursavich <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; Michael Arata <[MArata@jonesswanson.com](mailto:MArata@jonesswanson.com)>; John Arnold <[JArnold@jonesswanson.com](mailto:JArnold@jonesswanson.com)>; Alayne Gobeille <[agobeille@jonesswanson.com](mailto:agobeille@jonesswanson.com)>; Tom Dixon <[tdixon@jonesswanson.com](mailto:tdixon@jonesswanson.com)>; Rosa Acheson <[RAcheson@jonesswanson.com](mailto:RAcheson@jonesswanson.com)>; Monique Edwards (DNR) <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>  
**Subject:** Re: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Jonathan,

Thank you to all. We will be reaching out to discuss scheduling with counsel for Indigo. We of course will want time to respond to any modified plan submitted by Indigo. A question that we need answered is whether Indigo will be sampling the pit areas as set forth in the June 6th correspondence? That may very well impact the time we will need to respond and whether we can do that inside the 30 days contemplated for a response by the landowner. Scott - please let us know the answer to this question and then we can arrange a call. We are available today or tomorrow. Thank you. Glad.

Sent from my iPhone

On Jun 12, 2023, at 10:59 AM, Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)> wrote:

Thank you, Mr. Rice.



Kevin, can you advise whether Gamble LLC has any objection to resetting the limited admission hearing for July 18-20? Those dates work for DNR and for Indigo.

Thanks.

Scott C. Sinclair

Sinclair Law Firm  
PO Box 1026  
Shreveport, LA 71163-1026  
(318) 562-3700  
[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)

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**From:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>  
**Sent:** Monday, June 12, 2023 10:55 AM  
**To:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>; 'Kevin Huddell' <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; 'Edwin Hightower' <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>  
**Cc:** Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; 'Bernard Boudreaux' <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; 'OAL Processing' <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; 'Cheryl Berner' <[CBerner@jonesswanson.com](mailto:CBerner@jonesswanson.com)>; 'Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; 'Taylor Townsend' <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; 'Craig Isenberg' <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); 'Alan Ezkovich' <[Alan.Ezkovich@ezkovichlaw.com](mailto:Alan.Ezkovich@ezkovichlaw.com)>; 'Lynn Swanson' <[LSwanson@jonesswanson.com](mailto:LSwanson@jonesswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); 'Taylor L. Gamm' <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); 'Jude C. Bursavich' <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; 'Michael Arata' <[MArata@jonesswanson.com](mailto:MArata@jonesswanson.com)>; 'John Arnold' <[JArnold@jonesswanson.com](mailto:JArnold@jonesswanson.com)>; 'Alayne Gobeille' <[agobeille@jonesswanson.com](mailto:agobeille@jonesswanson.com)>; 'Tom Dixon' <[tdixon@jonesswanson.com](mailto:tdixon@jonesswanson.com)>; 'Rosa Acheson' <[RAcheson@jonesswanson.com](mailto:RAcheson@jonesswanson.com)>; Monique Edwards (DNR) <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>  
**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Mr. Sinclair:

The July 18-20 dates are good with Conservation. Have you received a response from Mr. Huddell regarding the landowner's thoughts?

Best regards,

F. Jonathan Rice, Attorney  
LDNR / Office of Conservation  
Phone: (225) 342-9660  
Fax: (225) 342-3705  
[Jonathan.rice@la.gov](mailto:Jonathan.rice@la.gov)

---

**From:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>  
**Sent:** Friday, June 9, 2023 3:40 PM  
**To:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>; 'Kevin Huddell' <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; 'Edwin Hightower' <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>  
**Cc:** Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; 'Bernard Boudreaux' <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; 'OAL Processing' <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; 'Cheryl Berner' <[CBerner@jonesswanson.com](mailto:CBerner@jonesswanson.com)>; 'Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; 'Taylor Townsend' <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; 'Craig Isenberg' <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); 'Alan Ezkovich' <[Alan.Ezkovich@ezkovichlaw.com](mailto:Alan.Ezkovich@ezkovichlaw.com)>; 'Lynn Swanson' <[LSwanson@jonesswanson.com](mailto:LSwanson@jonesswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); 'Taylor L. Gamm' <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); 'Jude C. Bursavich' <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; 'Michael Arata' <[MArata@jonesswanson.com](mailto:MArata@jonesswanson.com)>; 'John Arnold' <[JArnold@jonesswanson.com](mailto:JArnold@jonesswanson.com)>; 'Alayne Gobeille' <[agobeille@jonesswanson.com](mailto:agobeille@jonesswanson.com)>; 'Tom Dixon' <[tdixon@jonesswanson.com](mailto:tdixon@jonesswanson.com)>; 'Rosa Acheson' <[RAcheson@jonesswanson.com](mailto:RAcheson@jonesswanson.com)>; Monique Edwards (DNR) <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>  
**Subject:** RE: 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

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Mr. Rice:

As you know, Indigo Minerals firmly believes the proposed plan that it submitted is compliant with the requirements of Statewide Order 29B. You also know that, consistent with its position, Indigo Minerals has filed a motion in the underlying civil proceeding seeking an order compelling the Department to proceed with the limited admission hearing. Indigo Minerals reserves all rights with respect to these matters.

Nevertheless, we appreciate the expression in your email of a willingness to reset the hearing on an expedited basis with the understanding that DNR will be able to render a final plan in sufficient time prior to our trial set on October 23, 2023. By July 7, we can provide additional information and can further respond to the Commissioner's June 2 letter and your email below. That would allow us to reset the hearing for July 18 – 20. In turn, that would allow the Department to issue its most feasible plan no later than September 18.

Please confirm that July 18-20 are good dates for the panel.

To facilitate these schedule changes, we will submit for your review a joint motion to DAL to reset the limited admission hearing for July 18 and a joint motion to the DeSoto Parish court for additional time pursuant to R.S. 30:29.

Thank you.

Scott C. Sinclair

Sinclair Law Firm  
PO Box 1026  
Shreveport, LA 71163-1026  
(318) 562-3700  
[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)

---

**From:** Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>  
**Sent:** Tuesday, June 6, 2023 5:23 PM  
**To:** Scott C. Sinclair <[ssinclair@sinclair-law.com](mailto:ssinclair@sinclair-law.com)>; 'Kevin Huddell' <[KHuddell@jonesswanson.com](mailto:KHuddell@jonesswanson.com)>; 'Edwin Hightower' <[ehightower@adminlaw.la.gov](mailto:ehightower@adminlaw.la.gov)>  
**Cc:** Jamie Love (DNR) <[Jamie.Love@la.gov](mailto:Jamie.Love@la.gov)>; Houston Holley <[Houston.Holley@LA.GOV](mailto:Houston.Holley@LA.GOV)>; Claudia Rush (DNR) <[Claudia.Rush4@la.gov](mailto:Claudia.Rush4@la.gov)>; 'Bernard Boudreaux' <[BBoudreaux@jonesswanson.com](mailto:BBoudreaux@jonesswanson.com)>; Gavin Broussard <[Gavin.Broussard@la.gov](mailto:Gavin.Broussard@la.gov)>; 'OAL Processing' <[OALProcessing@adminlaw.la.gov](mailto:OALProcessing@adminlaw.la.gov)>; 'Cheryl Berner' <[CBerner@jonesswanson.com](mailto:CBerner@jonesswanson.com)>; 'Gladstone Jones' <[GJones@jonesswanson.com](mailto:GJones@jonesswanson.com)>; 'Taylor Townsend' <[taylor@taylortownsendlaw.com](mailto:taylor@taylortownsendlaw.com)>; 'Craig Isenberg' <[cisenberg@barrassousdin.com](mailto:cisenberg@barrassousdin.com)>; [swebre@barrassousdin.com](mailto:swebre@barrassousdin.com); 'Alan Ezkovich' <[Alan.Ezkovich@ezkovichlaw.com](mailto:Alan.Ezkovich@ezkovichlaw.com)>; 'Lynn Swanson' <[LSwanson@jonesswanson.com](mailto:LSwanson@jonesswanson.com)>; [john.king@bswllp.com](mailto:john.king@bswllp.com); 'Taylor L. Gamm' <[tgamm@barrassousdin.com](mailto:tgamm@barrassousdin.com)>; [dluder@barrassousdin.com](mailto:dluder@barrassousdin.com); 'Jude C. Bursavich' <[jude.bursavich@bswllp.com](mailto:jude.bursavich@bswllp.com)>; 'Michael Arata' <[MArata@jonesswanson.com](mailto:MArata@jonesswanson.com)>; 'John Arnold' <[JArnold@jonesswanson.com](mailto:JArnold@jonesswanson.com)>; 'Alayne Gobeille' <[agobeille@jonesswanson.com](mailto:agobeille@jonesswanson.com)>; 'Tom Dixon' <[tdixon@jonesswanson.com](mailto:tdixon@jonesswanson.com)>; 'Rosa Acheson' <[RAcheson@jonesswanson.com](mailto:RAcheson@jonesswanson.com)>; Monique Edwards (DNR) <[Monique.Edwards@la.gov](mailto:Monique.Edwards@la.gov)>; Jonathan Rice <[Jonathan.Rice@la.gov](mailto:Jonathan.Rice@la.gov)>  
**Subject:** 2023.06.06 Jack R. Gamble, Jr., LLC v. Indigo Minerals, LLC, DNR OC Legacy No. 042-003-001 [DAL# 2023-3171-DNR-OOC]

Mr. Sinclair:

The Division of Administrative Law has continued this matter in light of the Office of Conservation's June 2<sup>nd</sup> letter sent to your office. We are again requesting that Indigo move for a continuance (on behalf of the DNR/OC) by tomorrow, June 7, 2023, so a Statewide Order 29B compliant plan can be submitted to this Office for review.

Again, please see the reasons set forth in Conservation's June 2<sup>nd</sup> letter; and furthermore, please see the reasons and responses (to your June 6<sup>th</sup> letter to the Commissioner) set forth below.

1. A picture of the well and affidavit by both parties confirming that the picture is an accurate representation that that there is not well present.
2. Provide cross sections, including all available data (rig supply wells and EB borings).
3. Hypothetical plan must include the following missing information: a text description of the plan and what methodology would be performed for each well.
4. SN 239274: Provide samples for locations to the north, east and west of SB-2.

5. SN 239592: Provide a delineation to the east and north and SPLP for SB-2/2R (8-10) at the depth of 8-10 ft. bgs.
6. SN 240035: Provide delineation from east, south, and west for sample SB1/1R at the depth of 8-10 ft bgs. Provide delineation samples for north, east, and west of this location for SB-3 at the depth of 0-2 ft bgs. MW-1 at 8-12 ft bgs should be sampled above and below for delineation. Horizontally it should be delineated at the highest exceedance for barium.
7. SN 240037: More samples needed for these areas: SB-1/1R at the depth of 0-2 ft bgs should be horizontally delineated. SB-2/2R at the depth of 8-10 ft bgs should be sampled above and below for barium.
8. Please provide all data in the tables in the same units as required by – RECAP Section 2.5 & LAC 43:XIX.611.F.
9. It is noted that Indigo's June 6<sup>th</sup> letter provides the intended future use of the property.
10. According to RECAP Section 2.4 and LAC 43:XIX.611.F, 1 matrix spike/matrix spike duplicate from the site per 20 field samples shall be provided.

The sooner your client provides the necessary requested information for a compliant plan, the sooner Conservation can reset the Administrative Hearing to provide sufficient time prior to your trial set in October 23, 2023. Please notify Conservation if Indigo does not intend to file a Continuance on DNR/OC's behalf. Thank you for your time and attention to this matter.

Best regards,

F. Jonathan Rice, Attorney  
LDNR / Office of Conservation  
Executive Division  
P.O. Box 94275  
Baton Rouge, LA 70804-9275  
Phone: (225) 342-9660  
Fax: (225) 342-3705  
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