



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:

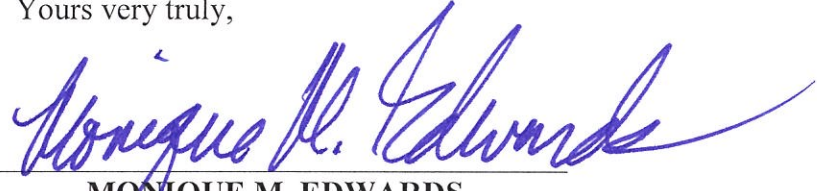
This Office has completed our review of Indigo Minerals, LLC's proposed plan, dated March 15, 2023, related to DNR OC Legacy No. 042-003-001. It has been determined the referenced plan does not meet the requirements outlined in Ch. 6 of Statewide Order 29B in the following particulars:

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)