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Cc: [Christopher Delmar](#); [Claudia Rush \(DENR\)](#); [Jamie Love \(DENR\)](#); [DNR Act312](#); [Thomas Bates \(DENR\)](#); [Jonathan Rice](#)
Subject: Gastal v. Petrodome, 2022-10495 "A", 15th JDC (Acadia Parish); Proposed Plan Issues
Date: Wednesday, November 19, 2025 3:48:33 PM
Attachments: [image001.png](#)
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[image015.png](#)
[image016.png](#)

Ms. Rodriguez:

The Department of Conservation and Energy has identified the issues below that require correction regarding the proposed most feasible plan submitted by your client. Please forward this information to your client, so the necessary revisions can be made and the revised plan submitted to our office.

1. Non-Compliance with LAC 43:XIX.611.F.1

C&E has determined that Petrodome's plan is not compliant with LAC 43:XIX.611.F.1, which requires submission of a plan that complies with all provisions of Statewide Order 29-B, exclusive of §319.

a. Petrodome shall submit a revised plan that is fully compliant with Statewide Order 29-B without exception.

2. Groundwater monitoring

a. The Project Timeline (Appendix O) reflects one (1) year of groundwater monitoring; however, the plan and cost estimate do not include any reference to groundwater monitoring.

b. Petrodome shall submit a revised plan that is compliant with LAC 43:XIX.611 and accurately reflects the text of the document.

3. RECAP Hydrocarbon Fraction Analysis Statement

On Page 30, Item #3, the plan states that "...RECAP requires the use of hydrocarbon fraction analysis..." While hydrocarbon fraction analysis is preferred, it is not required.

Page D-TPH-3 of RECAP states: "In lieu of identifying and quantitating the hydrocarbon fractions designated by the TPH Fraction and Indicator Approach... hydrocarbon mixtures may be identified and quantitated."

Please do not hesitate to email C&E (including all parties) if there are any questions or comments. The Commissioner's Conference in this matter is scheduled for Monday, November 24, 2025.

Best regards,



F. Jonathan Rice

Attorney Supervisor

Louisiana Department of Conservation and Energy

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