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November 3, 2025

VIA U.S. MAIL AND E-MAIL

Louisiana Department of Conservation and Energy
617 North 3rd Street
Baton Rouge, LA 70802

Ms. Jamie Love
Petroleum Scientist Manager
Louisiana Department of Conservation and Energy
617 North 3rd Street
Baton Rouge, LA 70802
Jamie.Love@la.gov
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RE: *Danny Paul Gastal, et al.*
vs. (No. 2022-10495)
Petrodome Operating, LLC, et al.
C&E Project No. 015-106

To Whom It May Concern and Ms. Love:

Our law firm represents the plaintiffs in the above-captioned lawsuit, including the owner of the damaged property, Mr. Danny Gastal. Two of the defendants in the lawsuit—PETRODOME OPERATING, LLC and ICHOR ENERGY (LA), LLC (the “Petrodome Defendants”)—filed a limited admission in this matter on or about September 4, 2025.

As we previously informed representatives of the Louisiana Department of Conservation and Energy (the “Department”), we do not presently intend to participate in any proceedings or hearing before the Department pertaining to the Petrodome Defendants’ limited admission because, among other issues: (1) the Petrodome Defendants are obligated under their contract with our client to restore the Gastal property to its pre-oil and gas condition, rather than to some lesser standard or regulatory requirement; and (2) the Petrodome Defendants have not complied with the applicable laws and rules governing limited admission proceedings, including, but not limited to, those set forth under LAC 43:XIX, Chapter 6.

Nonetheless, we are submitting the attached comments prepared by the landowner's experts—Mr. Brent Bray of RBB Consulting, LLC and Mr. Duane Piranio of Southland Environmental—in response to the Site Investigation Report and Proposed Remediation Plan submitted to the Department on behalf of the Petrodome Defendants on October 2, 2025. We are also submitting an affidavit by the landowner, Mr. Gastal, for the Department's consideration. In addition, enclosed you will find a flash drive containing electronic copies of these documents.

We are submitting these materials with a full reservation of Mr. Gastal's bargained-for rights under his contract with the Petrodome Defendants for the restoration of his property to its pre-oil and gas condition. Thus, Mr. Gastal does not waive any of those rights and maintains all his objections to the limited admission proceedings before the Department, as well as his objections to any plans or evidence that arise out of or relate in any way to these proceedings. Specifically, Mr. Gastal continues to expect the Petrodome Defendants to do what they promised in writing in the contract that allowed them to go onto the Gastal property and conduct the oil and gas operations that caused the damage in question. To that end, Mr. Gastal likewise reserves all objections to the admissibility of any evidence pertaining to these proceedings that in any way attempts to limit his bargained-for contract rights.

A reasonable effort has been made to obtain a complete list of all parties in this matter, as required under LAC 43:XIX.609. No commissioner's conference has been held thus far. In addition, in accordance with LAC 43:XIX, 611.G, I hereby state:

I, Turner D. Brumby, have reviewed the information submitted herewith and hereby attest that to the best of my knowledge, information and belief it is true and correct and is based on scientific data that has been obtained in a manner compliant with all applicable regulations.

If you have any questions or you would like to discuss any of these issues in more detail, please feel free to contact me at your convenience.

Thanking you for your courtesies, and with kindest regards, I am

Very truly yours,



TURNER D. BRUMBY

TDB;lb

cc: Mr. Jonathan Rice (via e-mail)
Mr. Christopher Delmar (via e-mail)
Ms. Claudia Rush (via e-mail)
Mr. Thomas Bates (via e-mail)
All counsel of record (via e-mail)