

December 1, 2025

Via E-mail (Jonathan.Rice@la.gov)

F. Jonathan Rice
Attorney Supervisor
Louisiana Department of Conservation and
Energy
Office of the Secretary
Office of Legal Services
617 North 3rd Street
Baton Rouge, LA 70802

Re: Gastal v. Petrodome, 2022-10595 "A", 15th JDC Acadia Parish
Agency ID. Legacy Project No. 015-106
Docket No. 2025-20968-DCE

Dear Mr. Rice:

Thank you for yours of November 19, 2025 providing the Department's comments in response to the proposed most feasible plan submitted by Petrodome Operating, LLC and Ichor Energy (LA), LLC (collectively, "Petrodome"). We provide the following in response to your comments:

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

Response: Petrodome has interpreted the first comment as a request for clarification of the contents (and roles) of the three plans submitted – Petrodome's proposed most feasible plan, Petrodome's proposed alternate plan, and the landowners' proposed plan drafted by Southland Environmental and RBB Consulting, LLC. Petrodome's response to this comment is found in the Alternate Plan Regarding the Site Investigation Report and Proposed Remediation Plan (Revision I) submitted as an attachment to this Response.

Comment 2: Groundwater Monitoring

Response: The MFP Project Timeline Graph included as part of Appendix O was included in the Site Investigation Report and Proposed Remediation Plan in error. The correct graph is submitted as an attachment to this Response.

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Comment 3: RECAP Hydrocarbon Fraction Analysis Statement

Response: Petrodome acknowledges that Page D-TPH-3 of RECAP states that "In lieu of identifying and quantitating the hydrocarbon fractions designated by the TPH Fraction and Indicator Approach, ... hydrocarbon mixtures may be identified and quantitated using the appropriate analytical method" and also provides on Page D-TPH-2 of RECAP that "If TPH fractionation data and TPH mixture data have both been collected at an AOI and the two data sets yield different conclusions concerning management of the AOI, then management decisions shall be based on the fractionation data since the fractionation method yields more specific information regarding the TPH constituents present and thus more accurately characterizes site conditions."

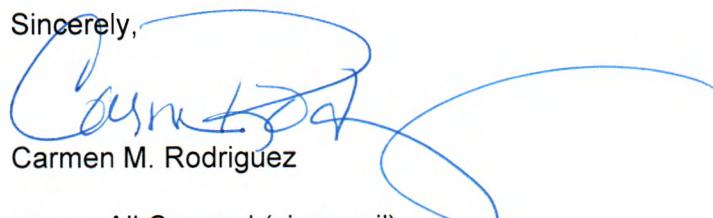
Submitted as attachments to this Response are:

1. The Alternate Plan Regarding the Site Investigation Report and Proposed Remediation Plan (Revision I), which supplements the proposed alternate plan included in Appendix O.
2. The MFP Project Timeline Graph, which replaces the timeline graph previously included in Appendix O.

Please let us know if you have any further comments, questions, or concerns.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Carmen M. Rodriguez". The signature is fluid and cursive, with a large, stylized 'C' at the beginning.

Carmen M. Rodriguez

cc: All Counsel (via email)
Act312@la.gov



HYDRO-ENVIRONMENTAL TECHNOLOGY, INC.

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December 01, 2025

Petrodome Operating, LLC and Ichlor Energy (LA), LLC c/o
Mr. Douglas Longman
Jones Walker LLP
600 Jefferson Street, Suite 1600
Lafayette, Louisiana 70501

Re: **Alternate Plan Regarding
the Site Investigation Report and Proposed Remediation Plan (Revision I)**
Danny Paul Gastal and Ignatius Hoffpauir v. Petrodome Operating, LLC, et al.
15th Judicial District Court; Docket No. 202210495-A
Section 32, Township 10 South, Range 01 West
Morse Oil and Gas Field
Morse, Acadia Parish, Louisiana
LDC&E Legacy Project No. 015-106

Dear Mr. Longman:

In response to the comments of the Louisiana Department of Conservation and Energy (C&E), Hydro-Environmental Technology, Inc. (HET) has prepared this Revision 1 to be submitted as a supplement to the alternate plan attached as part of Appendix O to the Site Investigation Report and Proposed Remediation Plan (the "Plan") filed on behalf of Petrodome Operating, LLC and Ichlor Energy (LA) LLC. (collectively referred to for the purposes of this report as Petrodome) on October 03, 2025, regarding the above referenced Danny Paul Gastal property (the "Property"). This alternate plan is being submitted for the purpose of the administrative hearing only should C&E find that such a supplement to the alternate plan is necessary to meet the requirements of 611.F.1 for the Plan. The purpose of the alternate plan is to address EC concentrations at depths below the effective root zone. This alternate plan is not required by Statewide Order 29-B, nor is the alternate plan endorsed, suggested to be the most feasible plan, or warranted or necessary for the protection of human health, the environment, or the reasonably intended uses of the Property.

The alternate plan, as referred to in Section 1.8 of the Plan, seeks to present alternate options to those presented in Section 7.0 of the Plan, which addresses ESP and SAR concentrations within the effective root zone only via a combination of targeted soil excavation and off-site disposal, as well as soil mixing and blending with potential addition of chemical amendments. This alternate plan is being submitted for administrative purposes only and in the event that the department finds that the Plan does not comply with Statewide Order 29-B, Sections 313.D, 313.E, and 611.F.1 despite the facts that the subsurface chloride concentrations do not meet the definition of contamination under Statewide Order 29-B and the proposed Plan fully addresses the agronomic and vegetative components of Statewide Order 29-B. Finally, this alternate plan is not required based on the overall regulatory framework established by C&E for the evaluation of sites pursuant to Statewide Order 29-B under LAC 43:XIX.313.D and 43:XIX.319, the second amended memorandum of understanding between the C&E and the LDEQ dated February 23, 2023, and the provisions of Act 312 which include the use of all appropriate regulations.

ATTACHMENT 1

The alternate plan offers an option for a larger soil excavation area to address concentrations of EC below the root zone to a depth upward of sixteen (16) feet below land surface (BLS), with soils beneath sixteen (16) feet BLS subject to monitored natural attenuation (MNA). This would be done in combination with the surface restoration described in Petrodome's Plan. Again, this alternate plan is not endorsed by the authors or suggested to be the most feasible plan, warranted, or necessary based on the evaluation of data below and the protection of human health, the environment, and the uses of the Property. Such a plan is not necessary based on the nature and extent of conditions at the LAA, would result in more harm than good for the property, and would render the property unusable during implementation. Figure O-1 in Appendix A illustrates the general boundaries of the areas of soil remediation drawn to satisfy the potential requirements of the administrative hearing. Appendix B contains the supporting documentation for the costs associated with the unnecessary alternate soil remediation plan.

While HET maintains that MNA is an effective and active method of remediation, C&E determined that the Plan was not compliant with LAC 43:XIX.611.F.1 in correspondence dated November 19, 2025. In this case, the Plaintiffs' plan that is included in Appendix I of the Plan can serve as additional information to the alternate plan to C&E that is fully compliant with Statewide Order 29-B, Chapter 3, without exception (i.e., §319) for administrative purposes only, noting that the Plaintiff's plan seeks to restore constituent concentrations to background instead of the Chapter 3 pit closure standards. HET further maintains its earlier observations that the Plaintiffs' plan is not necessary, does not adhere to the regulatory framework established by C&E under Statewide Order 29-B, fails to conduct the necessary evaluation to justify the plan, and does more harm than good to the Property. Specifically, the Plaintiffs' plan would destroy the soil structure on the Property by removing the clay pan which would cause significant instability and render the Plaintiffs' remediation areas as unsuitable for farming and development as contemplated by the landowner in an affidavit included within the Plaintiffs' comments to the Plan dated November 03, 2025.

On behalf of Hydro-Environmental Technology, Inc. (HET), we appreciate the opportunity to provide these environmental services. Should you have any questions or need additional information, please feel free to contact us.

Sincerely,

HYDRO-ENVIRONMENTAL TECHNOLOGY, INC.

Matthew L. Greene

Matthew L. Greene (CPSS #495789)
Environmental Scientist



Certified Professional
Soil Scientist
MATTHEW L. GREENE
495789

Craig E. Cormier

Craig E. Cormier, P.G. (LA #356)
Principal Environmental Scientist



Brent T. Pooler

Brent T. Pooler, P.G. (LA #274)
Principal Risk Analyst/Hydrogeologist

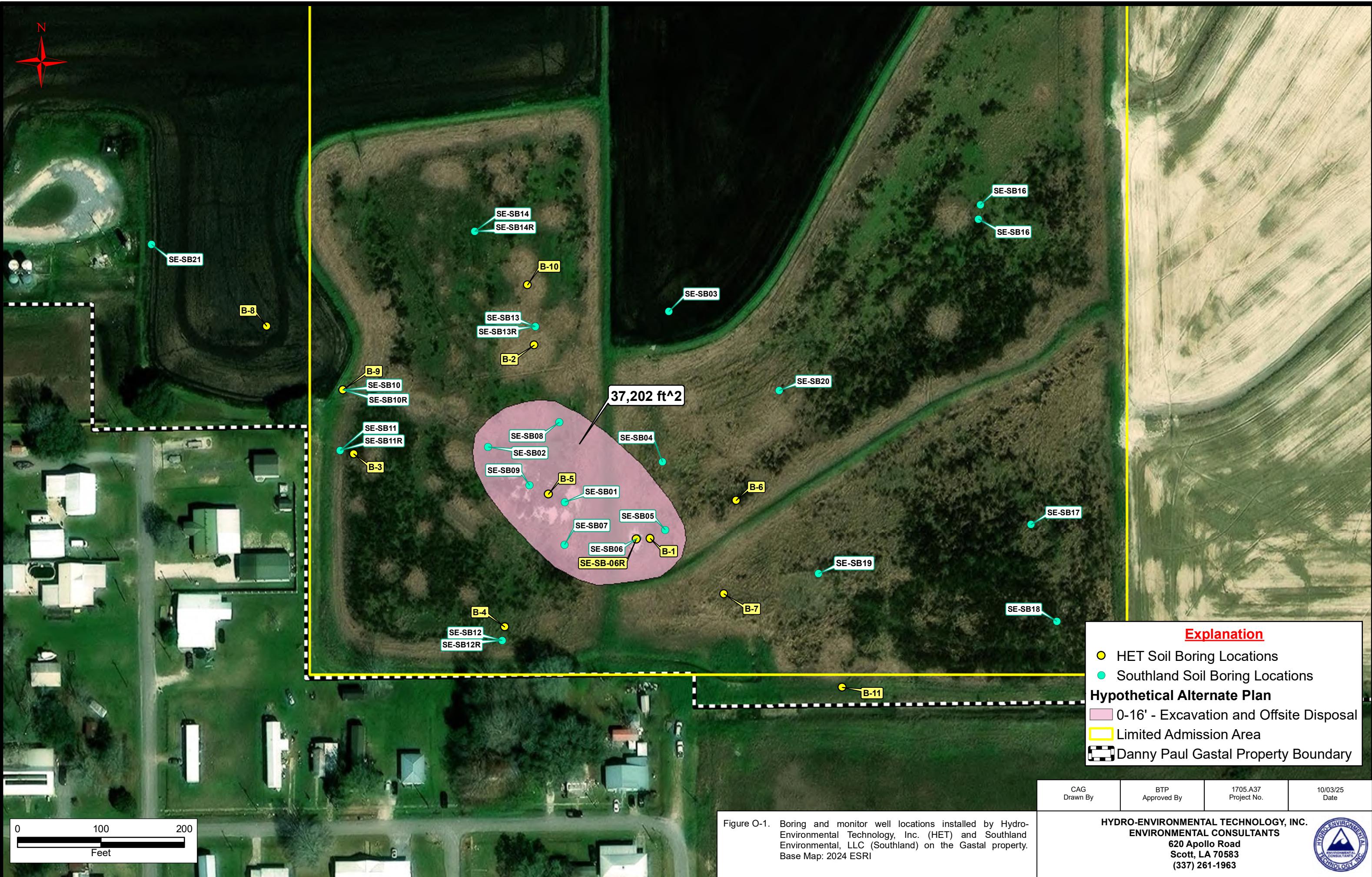
Stewart L. Stover, Jr.

Stewart L. Stover, Jr., P.G. (LA#440)
Director



APPENDIX A

FIGURE



APPENDIX B
COST ESTIMATE

Gastal Site - Alternate Plan - Remedial Activities - Estimated Costs



I. Project Planning & Logistics

Planning, Scheduling, Logistics, Safety Preparation

| Item | Description | Unit Cost | Quantity | Cost | Source |
|--|---|-----------|----------|-----------------|-------------------------------|
| Principal Environmental Scientist | Remedial Planning; Coordination/Planning/Scheduling with subcontractors | \$180 | 30 | \$5,400 | HET Hourly Rates |
| Project Manager | Remedial Planning; Coordination/Planning/Scheduling with subcontractors | \$140 | 30 | \$4,200 | HET Hourly Rates |
| GIS Cartographer | Remedial Planning; Coordination/Planning/Scheduling with subcontractors | \$70 | 8 | \$560 | HET Hourly Rates |
| HSSE Director | Prepare and implement Safety Plans/Forms/Manuals/etc. | \$155 | 20 | \$3,100 | HET Hourly Rates |
| Subtotal: | | | | \$13,260 | Subtotal |
| Onsite Kickoff Meetings, Initial Site Setup, Line Locates | | | | | |
| Item | Description | Unit Cost | Quantity | Cost | Source |
| Principal Environmental Scientist | Begin Remedial Activities, Initial Oversight, Observe Site Progress | \$180 | 10 | \$1,800 | HET Hourly Rates |
| Project Manager | Begin Remedial Activities, Initial Oversight, Observe Site Progress | \$140 | 10 | \$1,400 | HET Hourly Rates |
| Mileage, Per Diem, etc. | HET crew for one (1) day | \$265 | 1 | \$265 | HET Rates |
| Drone Rental, Pre-Remediation Photographs | \$125 per hour | \$125 | 1 | \$125 | HET Equipment Rates |
| EMC Third Party Line Locate | Subsurface survey @ \$3,500 per day | \$3,500 | 1 | \$3,500 | EMC - Subcontract Line Locate |
| 5% MARKUP - Subcontracted labor (EMC) | Standard Subcontracted labor markup (5%) | \$175 | 1 | \$175 | Standard Mark-Up |
| Subtotal: | | | | \$7,265 | Subtotal |
| Item I Total: | | | | \$20,525 | Total Costs for Item I |

II. Remedial Activities: Excavation

Implementation of Remedial Activities

| Subcontractor Items | Description | Unit Cost | Quantity | Cost | Source |
|--|---|-----------|----------|--------------------|--------------------------------------|
| Mobilization/Demobilization | Transportation of equipment and personnel | \$10,000 | 1 | \$10,000 | Standard Industry Rates |
| Equipment and Manpower for Excavation | Heavy equipment and operators charged at day rate (Excavator, Dozer, etc.) | \$470,100 | 1 | \$470,100 | Standard Industry Rates |
| Transportation Impacted Materials | Dump trucks necessary for transportation of excavated materials charged by the load | \$700 | 1325 | \$927,500 | Standard Industry Rates |
| Disposal Impacted Material | Disposal fees for off-site landfill and/or recycling charged by the ton | \$45 | 26455 | \$1,190,475 | Standard Industry Rates |
| Clean Backfill (including hauling) | Clean fill material obtained from offsite dirt pit charged by the cubic yard | \$17 | 20700 | \$351,900 | Standard Industry Rates |
| Clean Topsoil (including hauling) | Clean topsoil material obtained from offsite dirt pit charged by the cubic yard | \$26 | 1400 | \$36,400 | Standard Industry Rates |
| Mats | Transportation, laying, rental, and removal of 15,000 square feet of wooden mats | \$45,000 | 2 | \$90,000 | Standard Industry Rates |
| Rock | Rock material obtained from offsite supplier charged by the ton | \$55 | 250 | \$13,750 | Standard Industry Rates |
| Cooling Trailer | Equipment necessary for cooling of personnel | \$110 | 58 | \$6,380 | Standard Industry Rates |
| Subtotal: | | | | \$3,096,505 | Subtotal |
| 5% MARKUP - Subcontracted Items | | | | \$154,825 | Mark-Up - Subcontracted Items |

HET Supervision and Direction of Remedial Activities

| Item | Description | Unit Cost | Quantity | Cost | Source |
|---|---|-----------|----------|--------------------|---------------------------------|
| Principal Environmental Scientist | Conduct remedial oversight, coordination of subcontractors, implementation of remedial plan | \$180 | 120 | \$21,600 | HET Hourly Rates |
| Project Manager | Conduct remedial oversight, coordination of subcontractors, implementation of remedial plan | \$140 | 670 | \$93,800 | HET Hourly Rates |
| HSSE Coordinator | Safety Oversight, Control of Work | \$135 | 670 | \$90,450 | HET Hourly Rates |
| Environmental Scientist I | Conduct remedial manifesting | \$70 | 540 | \$37,800 | HET Hourly Rates |
| Mileage, Per Diem, etc. | HET personnel mileage and per diem | \$19,600 | 1 | \$19,600 | HET Rates |
| Drone Rental, Post Remediation Photographs | \$125 per hour for twenty-five (25), one (1) hour uses | \$125 | 25 | \$3,125 | HET Equipment Rates |
| Laboratory Analysis | Laboratory Analysis of Backfill Material Pit | \$522 | 1 | \$522 | Subcontract Laboratory Estimate |
| 5% MARKUP - Subcontracted Laboratory Analyses - Waypoint Analytical | Standard Subcontracted lab markup (5%) | \$26 | 1 | \$26 | Standard Mark-Up |
| Portable Restroom and Hand Wash Station | Rental @ \$500 per month | \$500 | 2 | \$1,000 | Subcontractor Estimate |
| 5% MARKUP - Subcontracted Materials (Event Solutions) | Standard Subcontracted Materials markup (5%) | \$50 | 1 | \$50 | Standard Mark-Up |
| Subtotal: | | | | \$267,973 | Subtotal |
| Item II Total: | | | | \$3,519,303 | Total Costs for Item II |

Gastal Site - Alternate Plan - Remedial Activities - Estimated Costs

III. Project Management, Regulatory Agency Negotiations, Site Closure Reporting

Office Support During Field Activities, Regulatory Correspondence, Reporting

| Item | Description | Unit Cost | Quantity | Cost | Source |
|---|---|-----------|----------|-----------------------|----------------------------------|
| Principal Environmental Scientist | Project Overview and Management, Report Preparation | \$180 | 60 | \$10,800 | HET Hourly Rates |
| Principal Hydrogeologist | Project Management, Report Preparation | \$180 | 40 | \$7,200 | HET Hourly Rates |
| Hydrogeologist IV or Environmental Scientist IV | Project Management, Report Preparation | \$135 | 60 | \$8,100 | HET Hourly Rates |
| GIS Cartographer | GIS Mapping, Prepare Report Figures | \$70 | 40 | \$2,800 | HET Hourly Rates |
| Subtotal: | | | | \$28,900 | Subtotal |
| Item III Total: | | | | \$28,900 | Total Costs for Item IVII |
| TOTAL ESTIMATED COSTS | | | | | |
| Item | | | | Cost | |
| I. Project Planning & Logistics | | | | \$20,525.00 | |
| II. Remedial Activities: Excavation | | | | \$3,519,303.35 | |
| III. Project Management, Regulatory Agency Negotiations, Site Closure Reporting | | | | \$28,900.00 | |
| TOTAL ESTIMATED COSTS | | | | \$3,568,728.35 | TOTAL ESTIMATED COSTS |

10/3/2025

ESTIMATED TIMELINE: MOST FEASIBLE PLAN
Danny Paul Gastal Property
Morse Oil and Gas Field
Morse, Acadia Parish, Louisiana

Reporting Requirements, if necessary
(Surface Restoration Report)

Surface Restoration Activities, if
necessary

10/25/2025

1/24/2026

4/25/2026

ATTACHMENT 2