
2025.12.02 Gastal v. Petrodome, 2022-10495 "A", 15th JDC (Acadia Parish); Proposed Plan Issues

From Jonathan Rice <Jonathan.Rice@la.gov>

Date Tue 02-Dec-25 16:37

To Rodriguez, Carmen M. <carmenrodriguez@joneswalker.com>; Kboudreaux@coxbusiness.net <Kboudreaux@coxbusiness.net>; GKlein@coxbusiness.net <GKlein@coxbusiness.net>; Longman, Doug <dlongman@joneswalker.com>; Michel, Jenny <Jenny.Michel@lewisbrisbois.com>; Jennifer.Kretschmann@lewisbrisbois.com <Jennifer.Kretschmann@lewisbrisbois.com>; Durbin, Tabitha <Tabitha.Durbin@lewisbrisbois.com>; Mike Veron <mike@veronbice.com>; Andy Veazey <aveazey@veazeyfelder.com>; Turner Brumby <turner@veronbice.com>; Tammy Garbarino <Tammy@veronbice.com>; Angela Dugas <adugas@veazeyfelder.com>; Lisa Bonvillain <Lisa@veronbice.com>

Cc Christopher Delmar <Christopher.Delmar@LA.GOV>; Claudia Rush (DENR) <Claudia.Rush4@la.gov>; Jamie Love (DENR) <Jamie.Love@la.gov>; DNR Act312 <Act312@la.gov>; Thomas Bates (DENR) <Thomas.Bates@LA.GOV>; Jonathan Rice <Jonathan.Rice@la.gov>

Ms. Rodriguez:

Thank you for submitting your client's response. However, the response is insufficient because Appendix I is not a compliant 29-B plan. It does not "fully delineate the vertical and horizontal extent of the environmental damage" (LAC 43:XIX.611.B). Appendix I also does not contain "a chronological work schedule or proposal thereof detailing all activities necessary for implementation..." (Id. § 611.G).

Please submit a 29-B-compliant plan without exceptions, consistent with the regulations. Please provide a sufficient response by Friday, December 5. If your client is unable to do so within that timeframe, please advise the Department as to the reason and when we can expect the submission. At that point, the Department will determine whether the panel would be prejudiced in its review prior to the hearing currently scheduled for January 6, 2026.

Further, C&E's Motion to Extend Time Period to Conduct its Public Hearing is scheduled to be filed with the court tomorrow.

Thank you for your time and attention to this matter.

Best regards,

F. Jonathan Rice

Attorney Supervisor

Louisiana Department of Conservation and Energy

Phone: 225-342-9660 | **Email:** jonathan.rice@la.gov

From: Rodriguez, Carmen M. <carmenrodriguez@joneswalker.com>

Sent: Monday, December 1, 2025 4:43 PM

To: Jonathan Rice <Jonathan.Rice@la.gov>; Kboudreaux@coxbusiness.net; GKlein@coxbusiness.net; Longman, Doug <dlongman@joneswalker.com>; Michel, Jenny <Jenny.Michel@lewisbrisbois.com>; Jennifer.Kretschmann@lewisbrisbois.com; Durbin, Tabitha <Tabitha.Durbin@lewisbrisbois.com>; Mike Veron

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Subject: RE: Gastal v. Petrodome, 2022-10495 "A", 15th JDC (Acadia Parish); Proposed Plan Issues

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

Mr. Rice,

Thank you for providing the Department's comments concerning Petrodome's proposed most feasible plan. Attached please find our Response to the Department's comments, together with two attachments, which we hope will answer the Department's questions and concerns.

Please let us know if the Department requires any further information. Otherwise, we await the Department's date preference for the site visit next week.

Thanks very much.

Carmen M. Rodriguez | Partner
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From: Jonathan Rice <Jonathan.Rice@la.gov>
Sent: Wednesday, November 19, 2025 3:48 PM
To: Kboudreaux@coxbusiness.net; GKlein@coxbusiness.net; Longman, Doug <dlongman@joneswalker.com>; Rodriguez, Carmen M. <carmenrodriguez@joneswalker.com>; Michel, Jenny <Jenny.Michel@lewisbrisbois.com>; Jennifer.Kretschmann@lewisbrisbois.com; Durbin, Tabitha <Tabitha.Durbin@lewisbrisbois.com>; Mike Veron <mike@veronbice.com>; Andy Veazey <aveazey@veazeyfelder.com>; Turner Brumby <turner@veronbice.com>; Tammy Garbarino <Tammy@veronbice.com>; Angela Dugas <adugas@veazeyfelder.com>; Lisa Bonvillain <Lisa@veronbice.com>
Cc: Christopher Delmar <Christopher.Delmar@LA.GOV>; Claudia Rush (DENR) <Claudia.Rush4@la.gov>; Jamie Love (DENR) <Jamie.Love@la.gov>; DNR Act312 <Act312@la.gov>; Thomas Bates (DENR) <Thomas.Bates@LA.GOV>; Jonathan Rice <Jonathan.Rice@la.gov>
Subject: [EXTERNAL] Gastal v. Petrodome, 2022-10495 "A", 15th JDC (Acadia Parish); Proposed Plan Issues

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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of Legal Services

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