

February 17, 2016

VIA E-MAIL AND U.S. MAIL

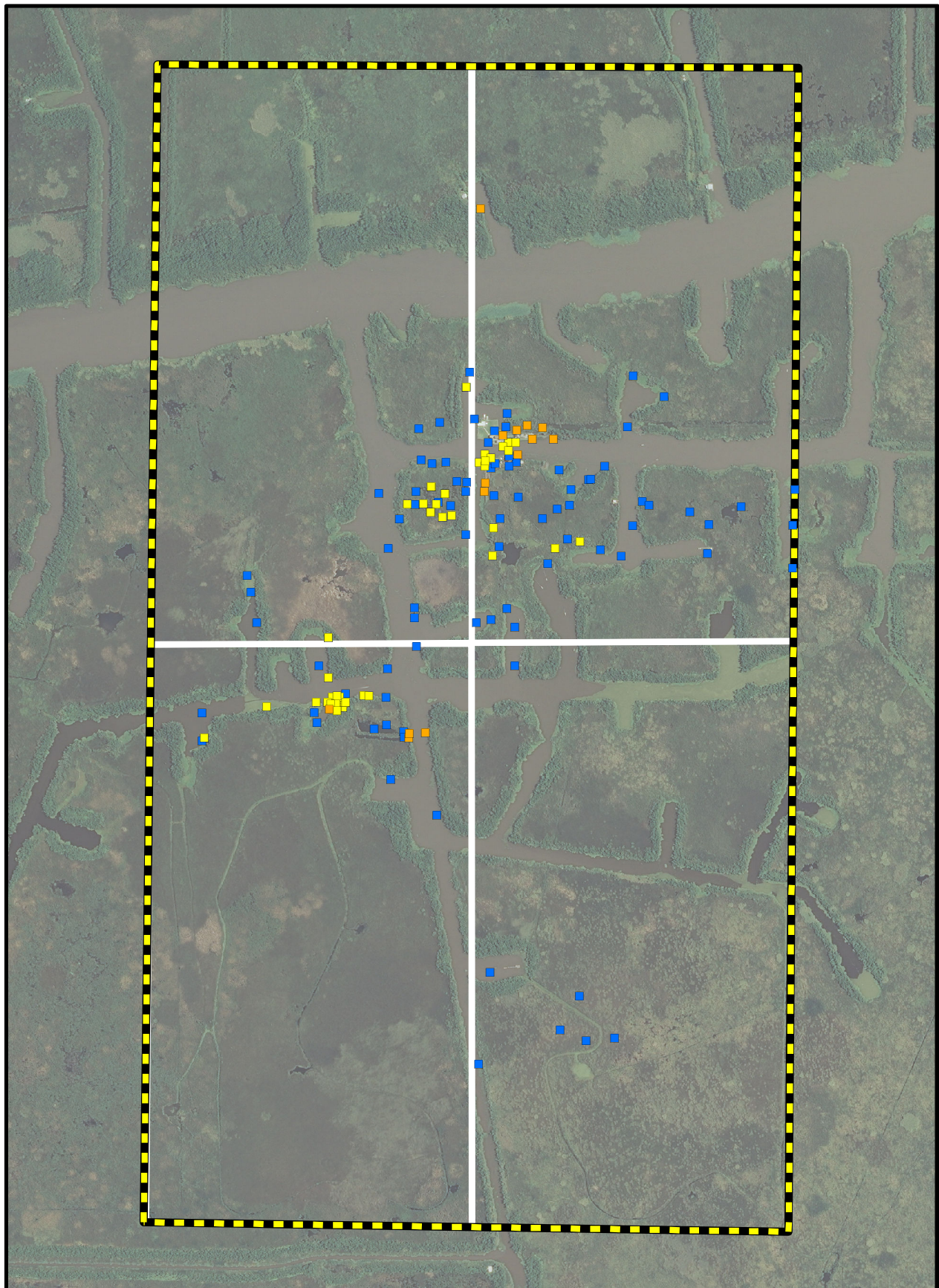
Mr. Gary W. Snellgrove
State of Louisiana
Department of Natural Resources
Office of Conservation
617 N. 3rd Street – 8th Floor
P. O. Box 94275
Baton Rouge, LA 70804

RE: *In Re: State of Louisiana, et al. v. The Louisiana Land and
Exploration Company, et al.*; DNR Docket No. ENV-L-2016-01
DNR OC Legacy Project No. 015-037
Our File No.: 12224-15

Dear Mr. Snellgrove:

Please find attached/enclosed a revised copy of ERM/Angela Levert's figures for her Supplemental RECAP evaluation (submitted to your office on February 15, 2016). Following the February 15 transmission to your office, the following corrections were made: (1) title of all figures updated to include "Suppl," in order to reflect that these figures are supplemental and to avoid any confusion with figures submitted for the initial RECAP evaluation in October 2015); (2) posted final concentration data to Figure 5-16 (as opposed to pending data); and (3) corrected a data entry error for the posted concentrations on Figure 5-11a Suppl.

Please update your copy of the Supplemental RECAP Evaluation to reflect the attached/enclosed revised figures.



Legend



Section 16 Township 15 S Range 01 E



ICON Sample Locations



MP&A Sample Locations



ICON Supplemental Locations

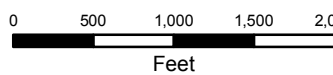
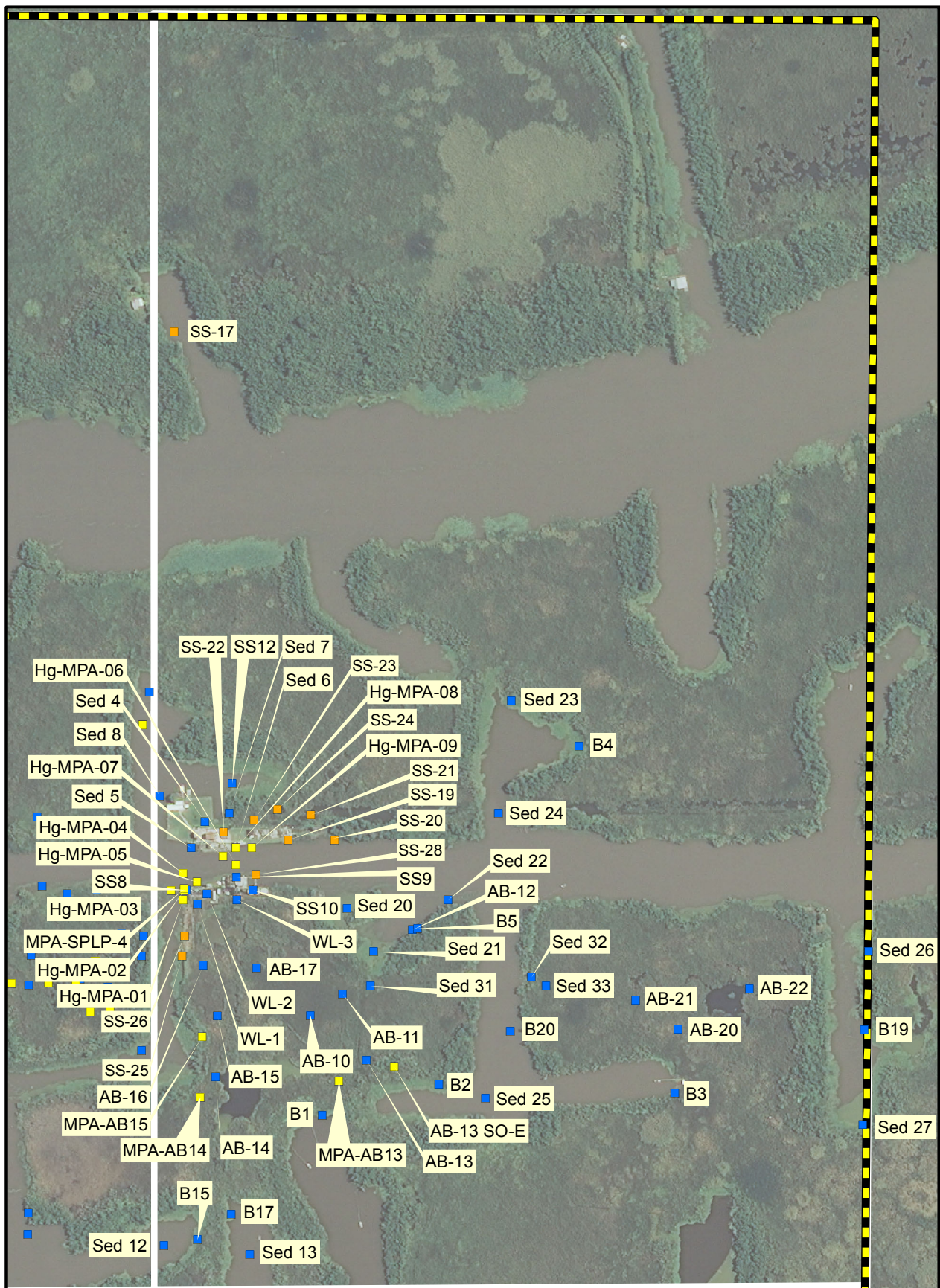


Figure 3-1 SUPPL - Sediment Sample Locations (Site-Wide)
East White Lake Oil & Gas Field
Vermilion Parish, Louisiana

MICHAEL PISANI & ASSOCIATES, INC.

Environmental Consulting Services
Baton Rouge, Louisiana New Orleans, Louisiana Houston, Texas

Designed: MMH Drawn: MMH Checked: LRC Date: 2/16/2016 Project: 07-47



Legend



Section 16 Township 15 S Range 01 E



ICON Sample Locations



MP&A Sample Locations



ICON Supplemental Locations

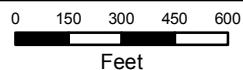
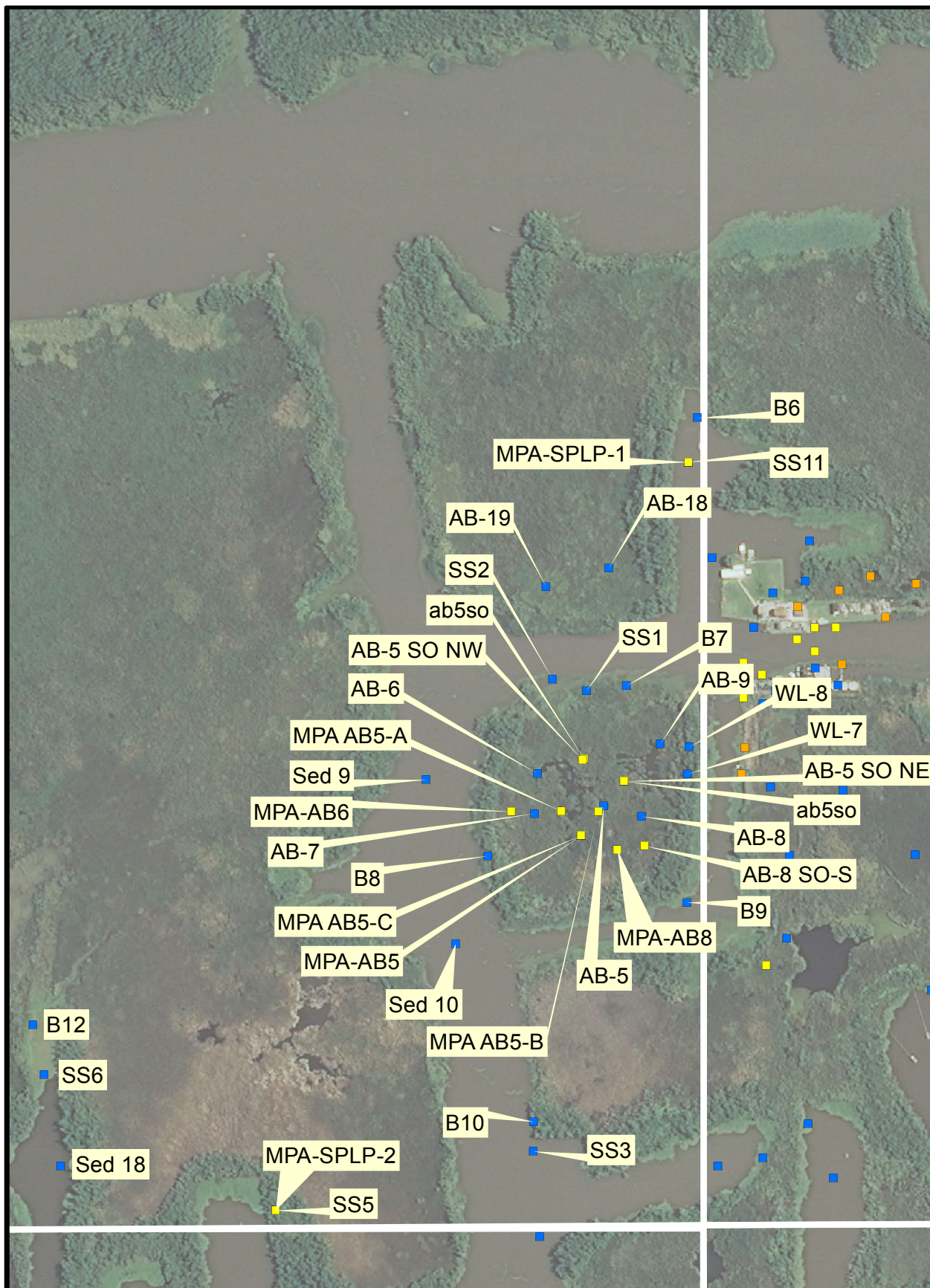


Figure 3-2 SUPPL - Sediment Sample Locations (Quadrant 1)
East White Lake Oil & Gas Field
Vermilion Parish, Louisiana

MICHAEL PISANI & ASSOCIATES, INC.

Environmental Consulting Services
Baton Rouge, Louisiana New Orleans, Louisiana Houston, Texas

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Legend



Section 16 Township 15 S Range 01 E



ICON Sample Locations



MP&A Sample Locations



ICON Supplemental Locations

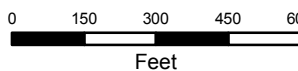
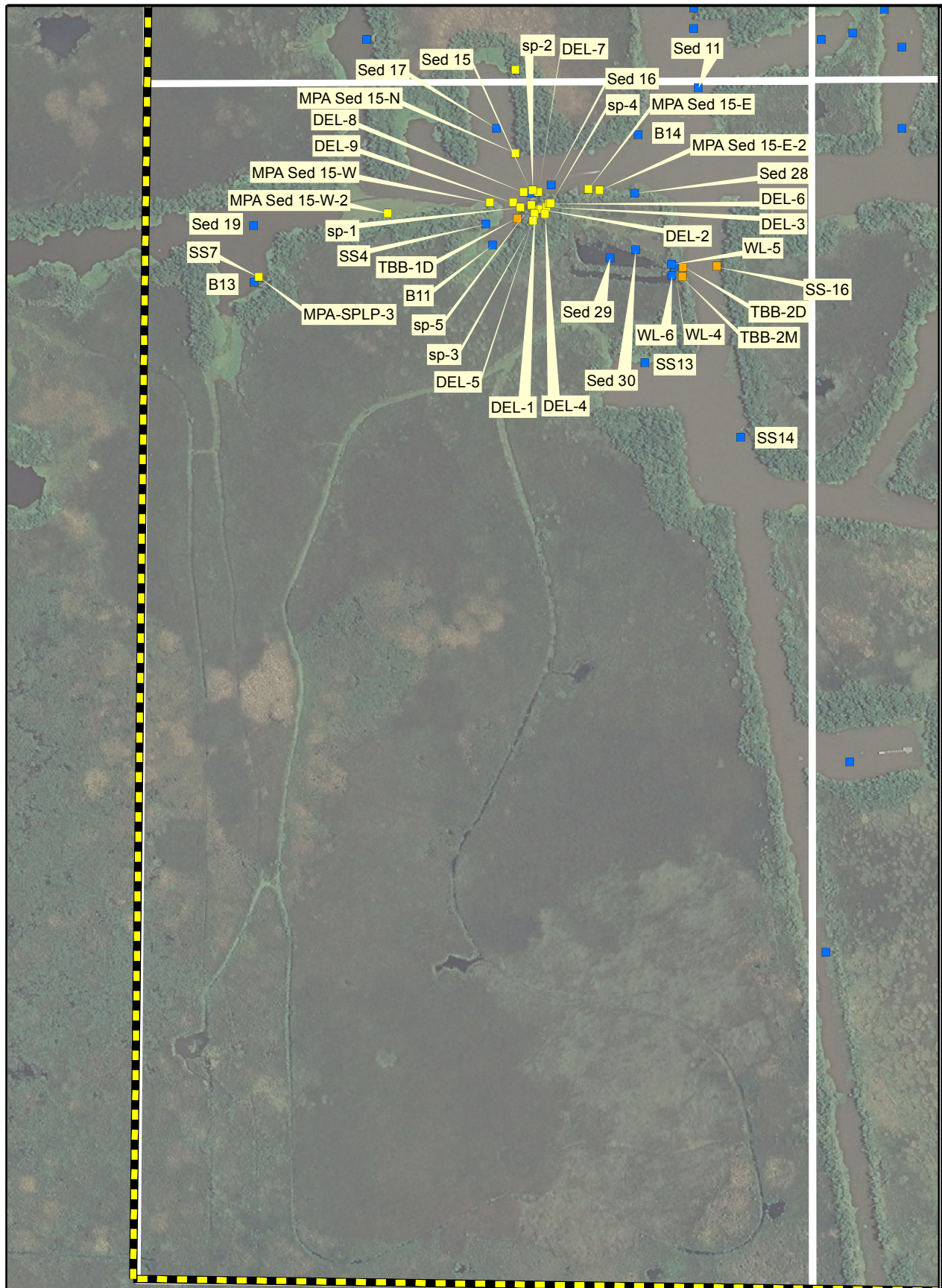


Figure 3-3 SUPPL - Sediment Sample Locations (Quadrant 2)
East White Lake Oil & Gas Field
Vermilion Parish, Louisiana

MICHAEL PISANI & ASSOCIATES, INC.

Environmental Consulting Services
Baton Rouge, Louisiana New Orleans, Louisiana Houston, Texas

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Legend

-  Section 16 Township 15 S Range 01 E
-  ICON Sample Locations
-  MP&A Sample Locations
-  ICON Supplemental Locations

0 150 300 450 600
Feet



Figure 3-4 SUPPL- Sediment Sample Locations (Quadrant 3)
East White Lake Oil & Gas Field
Vermilion Parish, Louisiana

MICHAEL PISANI & ASSOCIATES, INC.

Environmental Consulting Services
Baton Rouge, Louisiana New Orleans, Louisiana Houston, Texas

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Legend



Section 16 Township 15 S Range 01 E



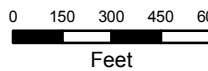
ICON Sample Locations



MP&A Sample Locations



ICON Supplemental Locations



Feet



Figure 3-5 SUPPL - Sediment Sample Locations (Quadrant 4)

*East White Lake Oil & Gas Field
Vermilion Parish, Louisiana*

MICHAEL PISANI & ASSOCIATES, INC.

Environmental Consulting Services
Baton Rouge, Louisiana New Orleans, Louisiana Houston, Texas

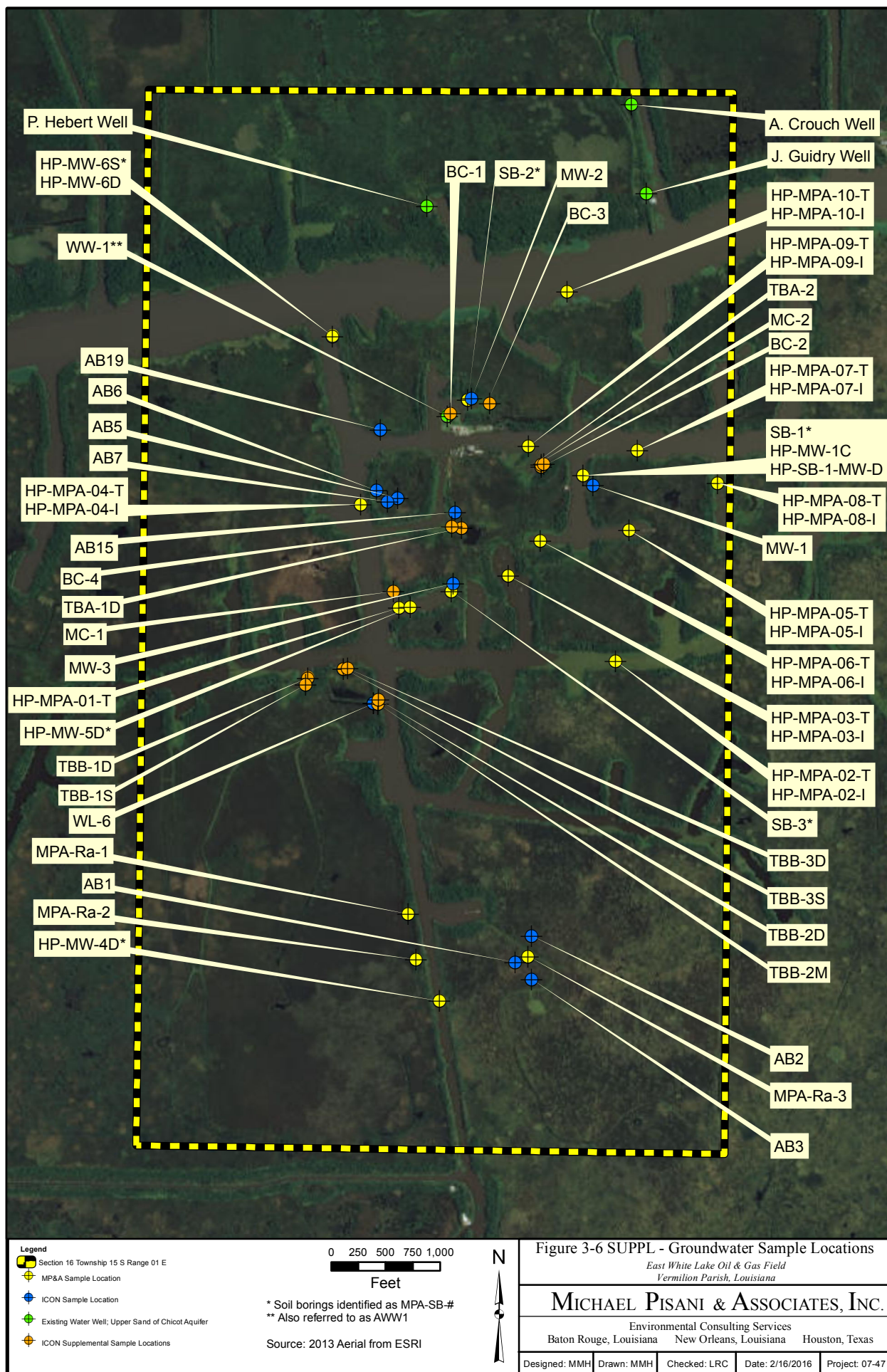
Designed: MMH

Drawn: MMH

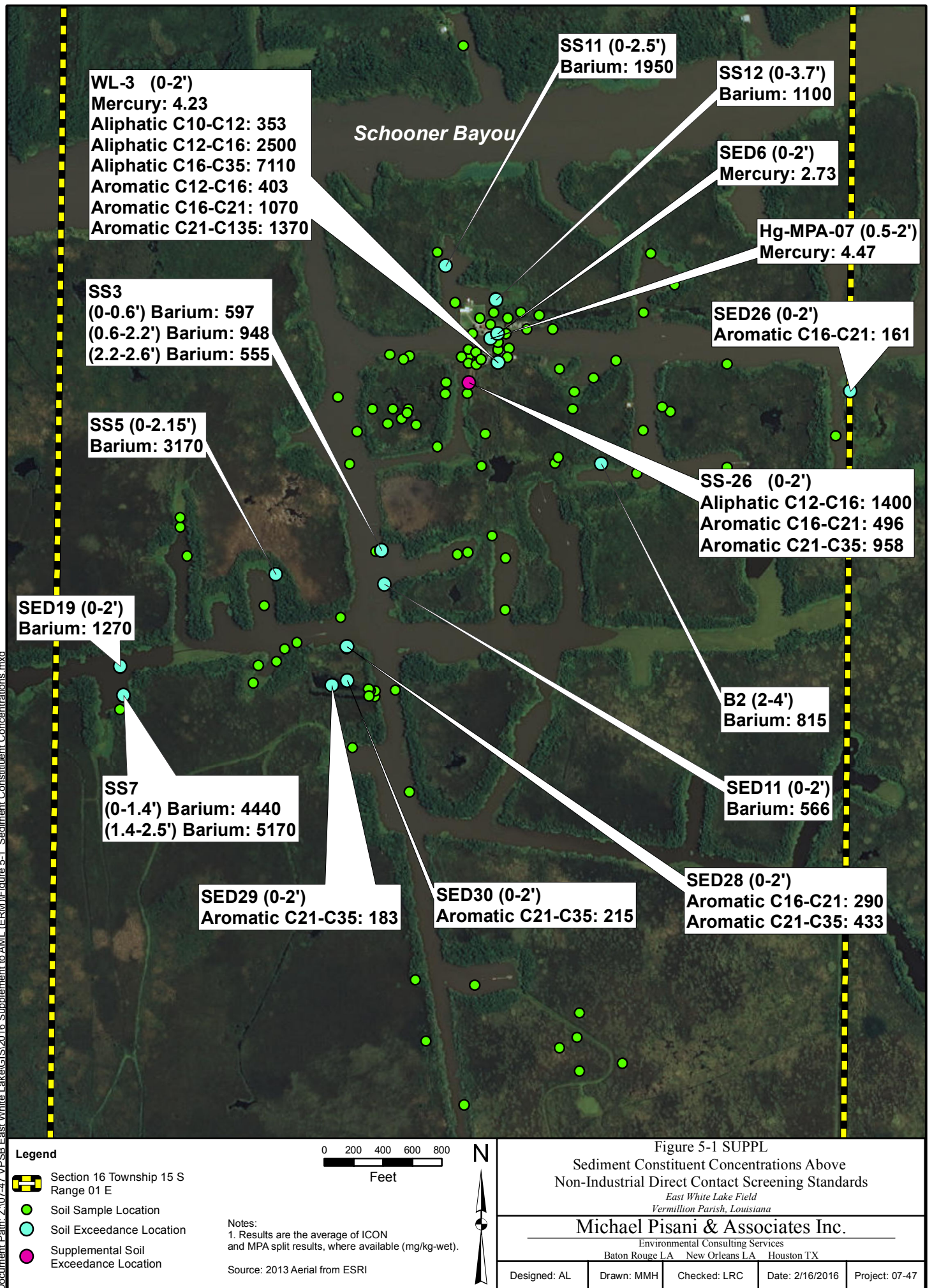
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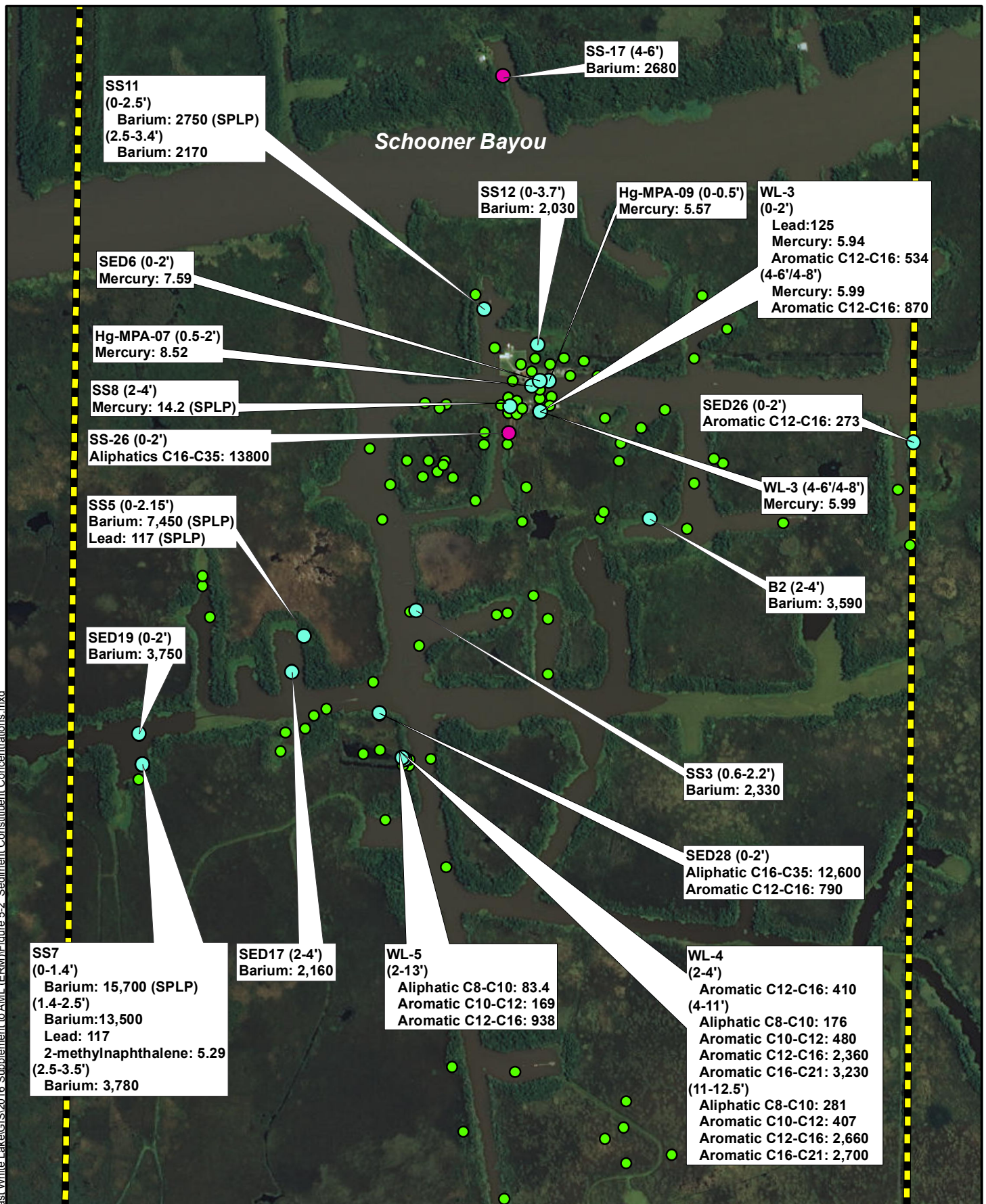
Date: 2/16/2016

Project: 07-47



Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-1 Sediment Constituent Concentrations.mxd





Legend

- Section 16 Township 15 S
Range 01 E
- Soil Sample Location
- Soil Exceedance Location
- Supplemental Soil
Exceedance Location

Notes:

1. Results are the average of ICON and MPA split results, where available (mg/kg-dry).

Source: 2013 Aerial from ESRI

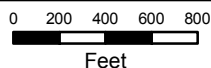


Figure 5-2 SUPPL
Sediment Constituent Concentrations Above
Groundwater Protection Screening Standards
East White Lake Field
Vermillion Parish, Louisiana

Michael Pisani & Associates Inc.

Environmental Consulting Services

Baton Rouge LA New Orleans LA Houston TX

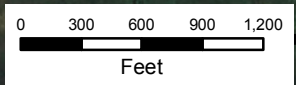
Designed: AL

Drawn: MMH

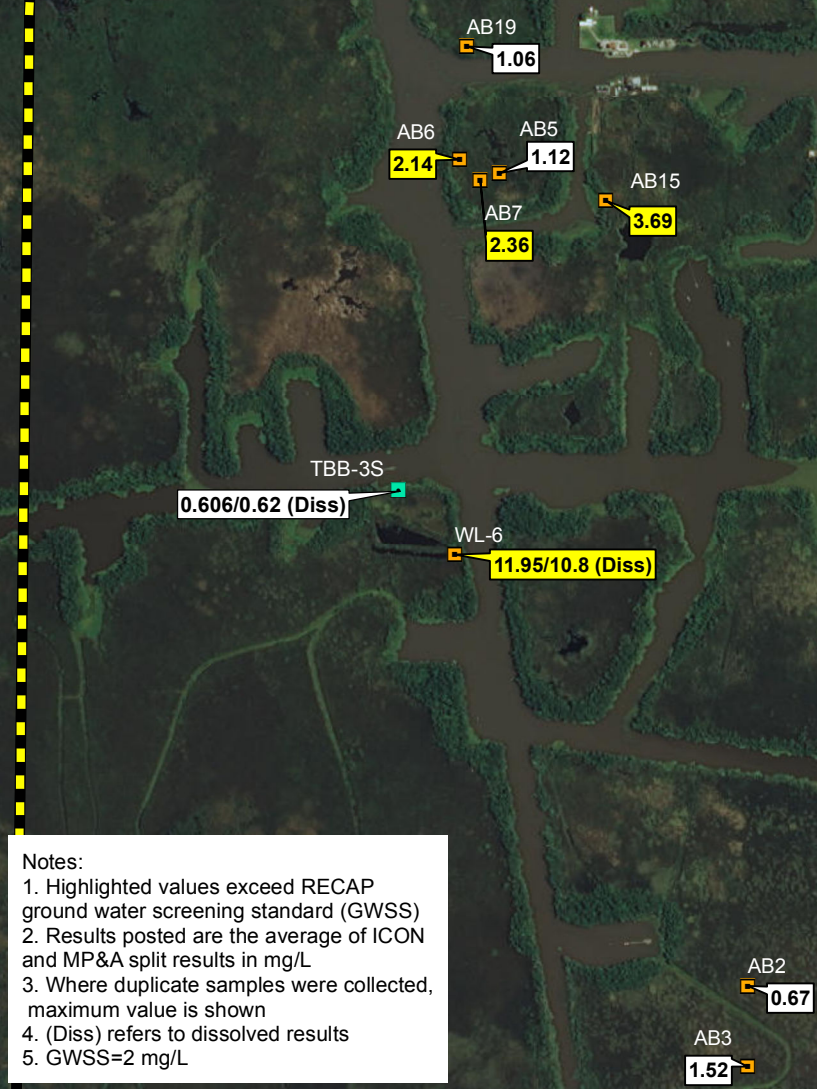
Checked: LRC

Date: 2/16/2016

Project: 07-47



Schooner Bayou



Notes:

1. Highlighted values exceed RECAP ground water screening standard (GWSS)
2. Results posted are the average of ICON and MP&A split results in mg/L
3. Where duplicate samples were collected, maximum value is shown
4. (Diss) refers to dissolved results
5. GWSS=2 mg/L

Legend

Section 16 Township 15 S Range 01 E

Groundwater Zone

Peat

Supplement



Figure 5-3 SUPPL
Peat Zone – Barium Concentrations

East White Lake Field
Vermillion Parish, Louisiana

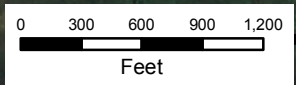
Michael Pisani & Associates Inc.

Environmental Consulting Services
Baton Rouge LA New Orleans LA Houston TX

Designed: AL	Drawn: MMH	Checked: LRC	Date: 2/16/2016	Project: 07-47
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Source: 2013 Aerial (ESRI)

Document Path: Z:\07-47\VP58 East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-3 Peat Zone - Barium Concentrations.mxd



Schooner Bayou



Notes:
 1. Highlighted values exceed RECAP ground water screening standard (GWSS)
 2. Results posted are the average of ICON and MP&A split results in mg/L
 3. Where duplicate samples were collected, maximum value is shown
 4. (Diss) refers to dissolved results
 5. GWSS=2.2 mg/L

Legend

Section 16 Township 15 S Range 01 E

Groundwater Zone

Peat

Supplement



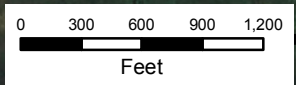
Figure 5-4 SUPPL
 Peat Zone – Strontium Concentrations
 East White Lake Field
 Vermillion Parish, Louisiana

Michael Pisani & Associates Inc.
 Environmental Consulting Services
 Baton Rouge LA New Orleans LA Houston TX

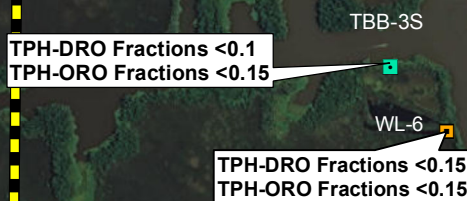
Designed: AL	Drawn: MMH	Checked: LRC	Date: 2/16/2016	Project: 07-47
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Source: 2013 Aerial (ESRI)

Document Path: Z:\07-47 VP58 East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-4 Peat Zone - Strontium Concentrations.mxd



Schooner Bayou



Notes:
1. Highlighted values exceed RECAP ground water screening standard (GWSS)
2. Results posted are the average of ICON and MP&A split results in mg/L
3. Where duplicate samples were collected, maximum value is shown
4. GWSS=0.15 mg/L

Legend

Section 16 Township 15 S Range 01 E

Groundwater Zone

Peat

Supplement

Source: 2013 Aerial (ESRI)

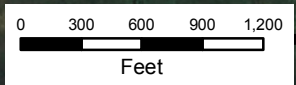


Figure 5-5 SUPPL
Peat Zone – Petroleum Hydrocarbon Concentrations
East White Lake Field
Vermillion Parish, Louisiana

Michael Pisani & Associates Inc.
Environmental Consulting Services
Baton Rouge LA New Orleans LA Houston TX

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Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-5 Peat Zone - Petroleum Hydrocarbon Concentrations.mxd



Schooner Bayou

AB19
3020

AB6
3900

AB5
14400

AB7
6210

AB15
7630

TBB-3S
1040

WL-6
16975

AB2
2310

AB3
2660

Legend

Section 16 Township 15 S Range 01 E

Groundwater Zone

- Peat
- Supplement

Notes:

1. Results posted are the average of ICON and MP&A split results in mg/L
2. Where duplicate samples were collected, maximum value is shown

Source: 2013 Aerial (ESRI)



Figure 5-6 SUPPL
Peat Zone – Chlorides Concentrations

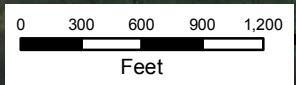
East White Lake Field
Vermillion Parish, Louisiana

Michael Pisani & Associates Inc.

Environmental Consulting Services
Baton Rouge LA New Orleans LA Houston TX

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Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-6 Peat Zone - Chlorides Concentrations.mxd



Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-7 40 to 60 ft. Zone - Barium Concentrations.mxd

- Notes:
1. Highlighted values exceed RECAP ground water screening standard (GWSS)
 2. Results posted are the average of ICON and MP&A split results in mg/L
 3. Where duplicate samples were collected, maximum value is shown
 4. (Diss) refers to dissolved results
 5. * refers to filtered samples due to turbidity
 6. GWSS= 2 mg/L

Legend

Section 16 Township 15 S Range 01 E

Groundwater Zone

40-60 ft

Supplement

Source: ESRI 2013 Aerial



Figure 5-7 SUPPL

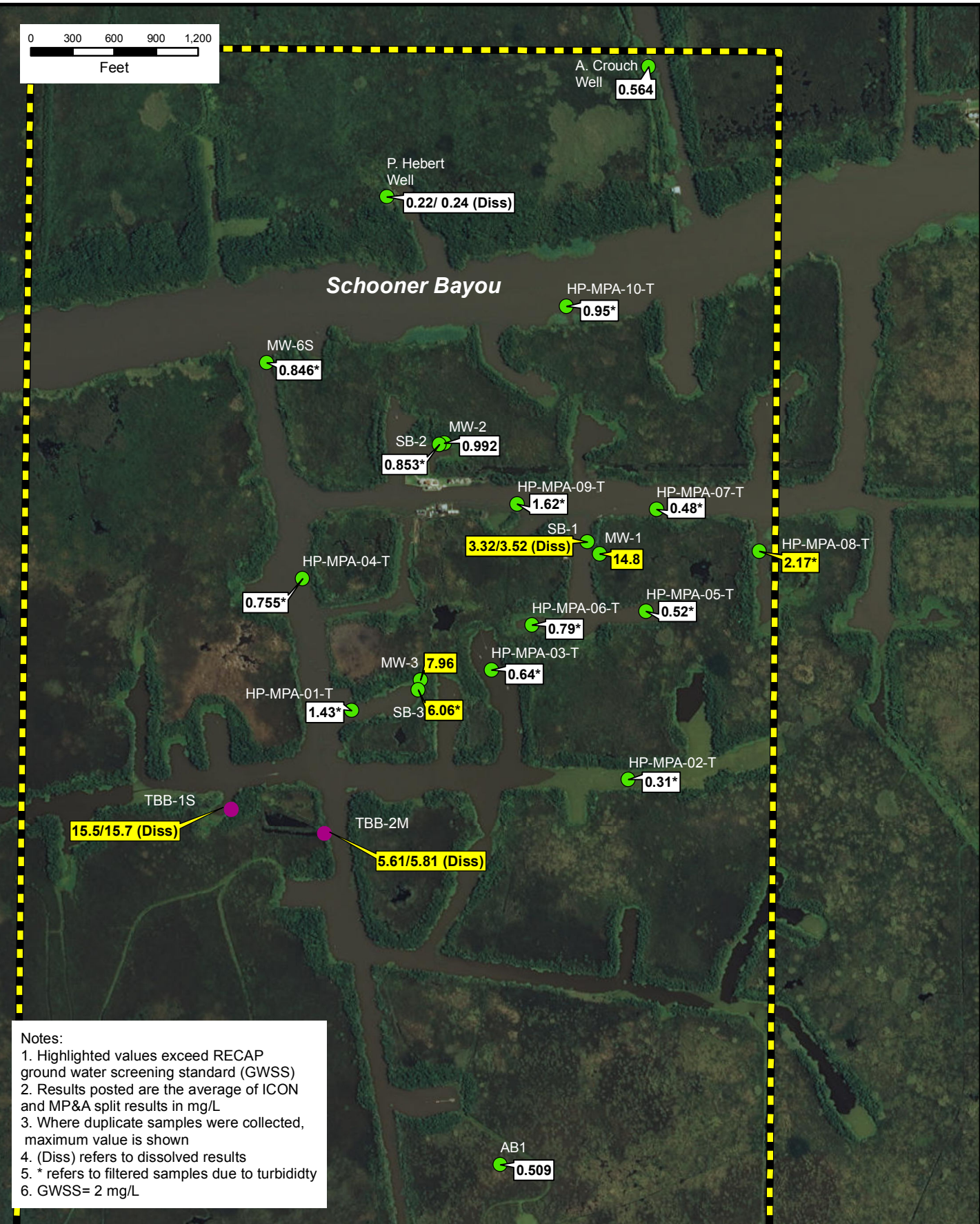
40 to 60 Foot Zone – Barium Concentrations

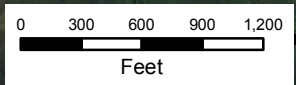
East White Lake Field
Vermillion Parish, Louisiana

Michael Pisani & Associates Inc.

Environmental Consulting Services
Baton Rouge LA New Orleans LA Houston TX

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Project: 07-47			





Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-8_40 to 60 ft Zone - Strontium Concentrations.mxd

Notes:
 1. Highlighted values exceed RECAP ground water screening standard (GWSS)
 2. Results posted are the average of ICON and MP&A split results in mg/L
 3. Where duplicate samples were collected, maximum value is shown
 4. (Diss) refers to dissolved results
 5. * refers to filtered samples due to turbidity
 6. GWSS= 2.2 mg/L

Legend

Section 16 Township 15 S Range 01 E

Groundwater Zone

40-60 ft

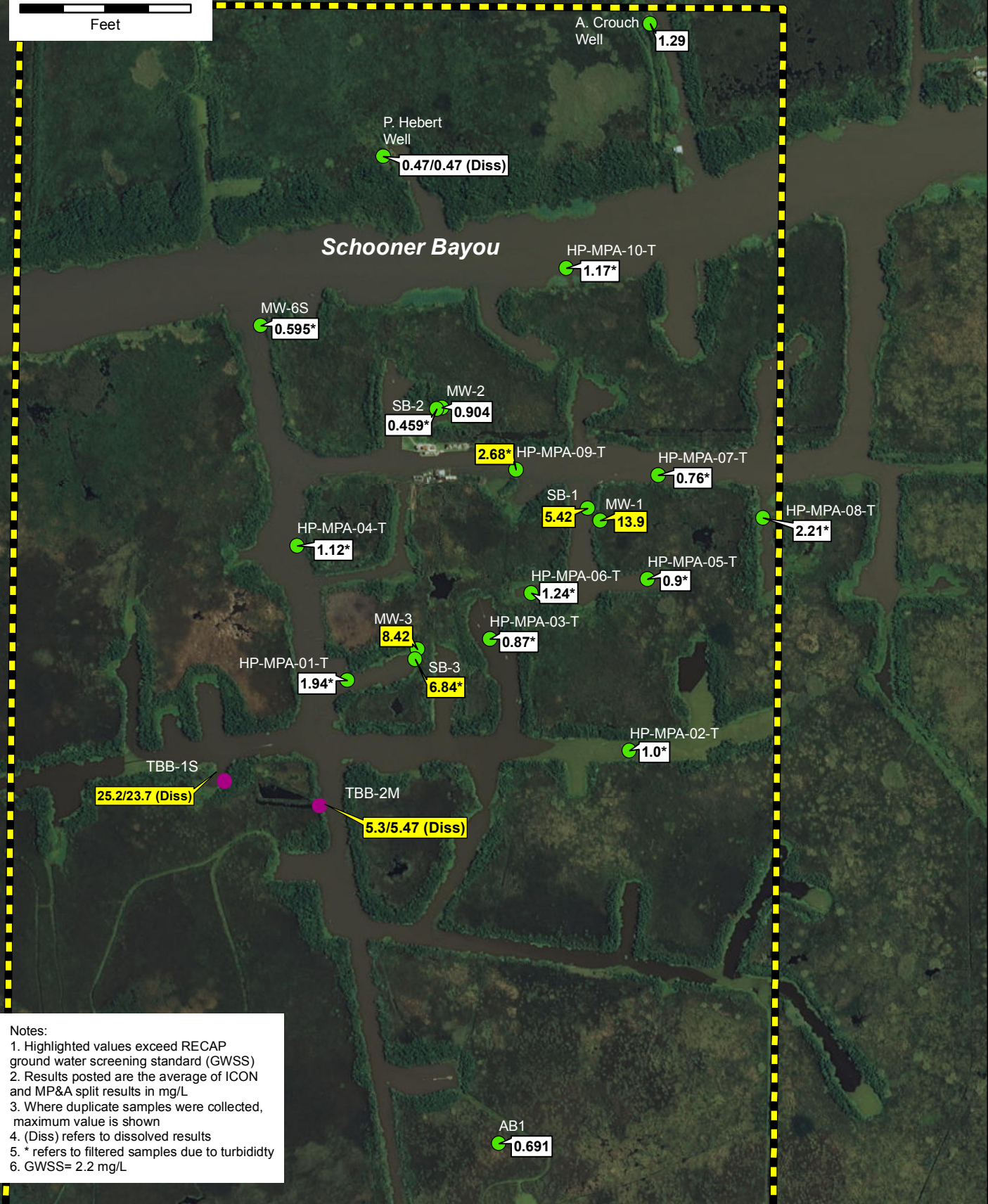
Supplement

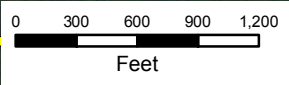


Figure 5-8 SUPPL
 40 to 60 Foot Zone – Strontium Concentrations
*East White Lake Field
 Vermillion Parish, Louisiana*

Michael Pisani & Associates Inc.
 Environmental Consulting Services
 Baton Rouge LA New Orleans LA Houston TX

Designed: AL	Drawn: MMH	Checked: LRC	Date: 2/16/2016	Project: 07-47
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Schooner Bayou

A. Crouch Well
<0.005

P. Hebert Well
<0.005

HP-MPA-10-T
<0.005

MW-6S
<0.005

SB-2
<0.005

MW-2
<0.005

HP-MPA-09-T
0.00504

HP-MPA-07-T
<0.005

HP-MPA-04-T
<0.005

SB-1
0.015

MW-1
0.029

HP-MPA-08-T
<0.005

HP-MPA-06-T
<0.005

HP-MPA-05-T
<0.005

HP-MPA-01-T
<0.005

MW-3
0.00318

HP-MPA-03-T
<0.005

SB-3
<0.005

HP-MPA-02-T
<0.005

TBB-1S
0.00689

TBB-2M
<0.005

AB1
<0.005

Notes:
1. Highlighted values exceed RECAP ground water screening standard (GWSS)
2. Results posted are the average of ICON and MP&A split results in mg/L
3. Where duplicate samples were collected, maximum value is shown
4. GWSS= 0.005 mg/L

Legend
 Section 16 Township 15 S Range 01 E

Groundwater Zone
 40-60 ft
 Supplement

Source: 2013 Aerial (ESRI)

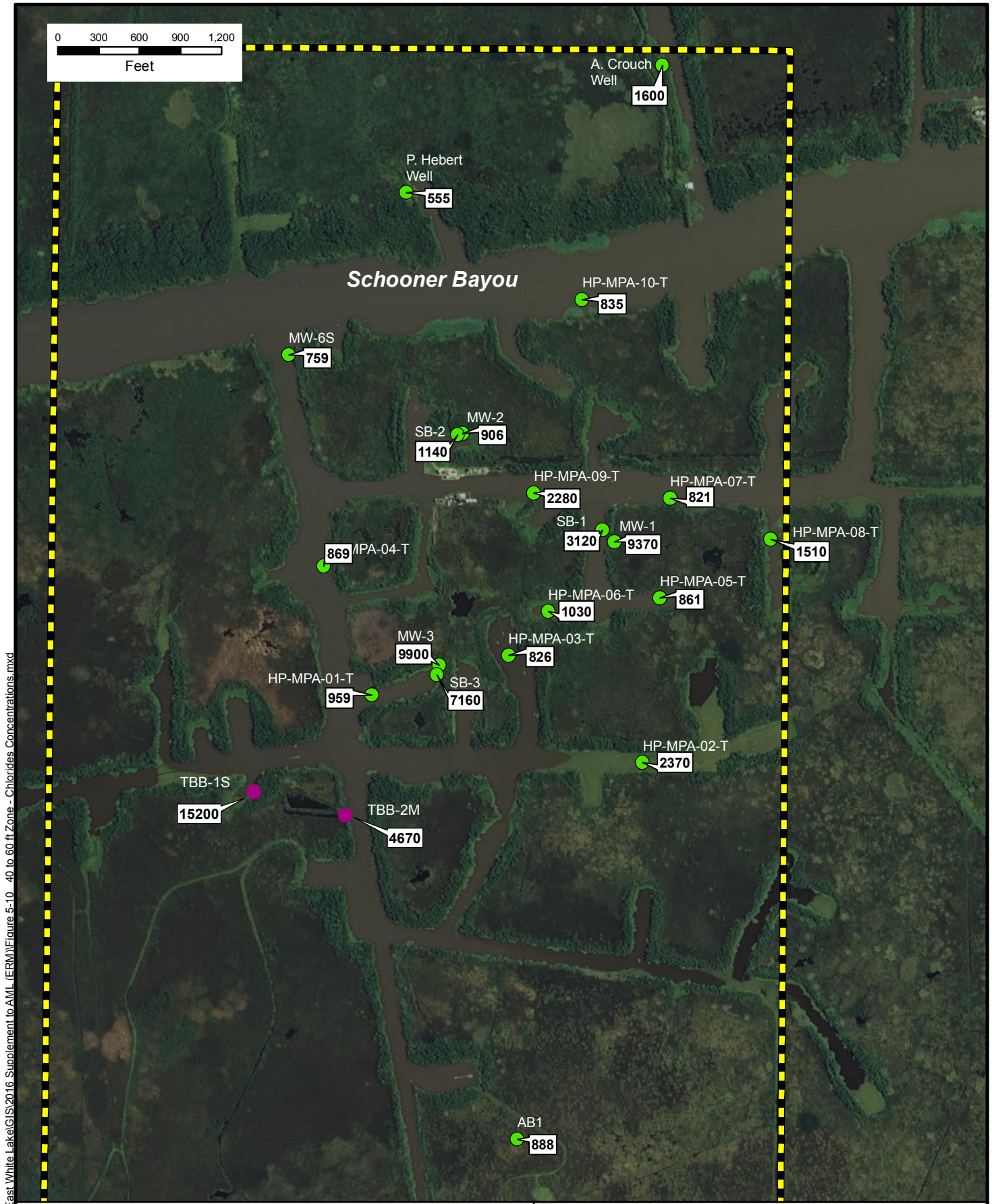
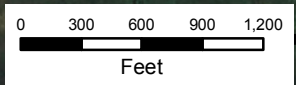


Figure 5-9 SUPPL
40 to 60 Foot Zone – Benzene Concentrations
East White Lake Field
Vermillion Parish, Louisiana

Michael Pisani & Associates Inc.
Environmental Consulting Services
Baton Rouge LA New Orleans LA Houston TX

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Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-9 40 to 60 ft Zone - Benzene Concentrations.mxd



Document Path: Z:\07-47.VP98 East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-10 - 40 to 60 ft Zone - Chlorides Concentrations.mxd

Legend

Section 16 Township 15 S Range 01 E

Groundwater Zone

40-60 ft

Supplement

Notes:

1. Results posted are the average of ICON and MP&A split results in mg/L

2. Where duplicate samples were collected, maximum value is shown

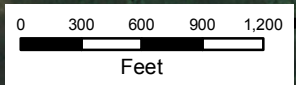
Source: 2013 Aerial (ESRI)



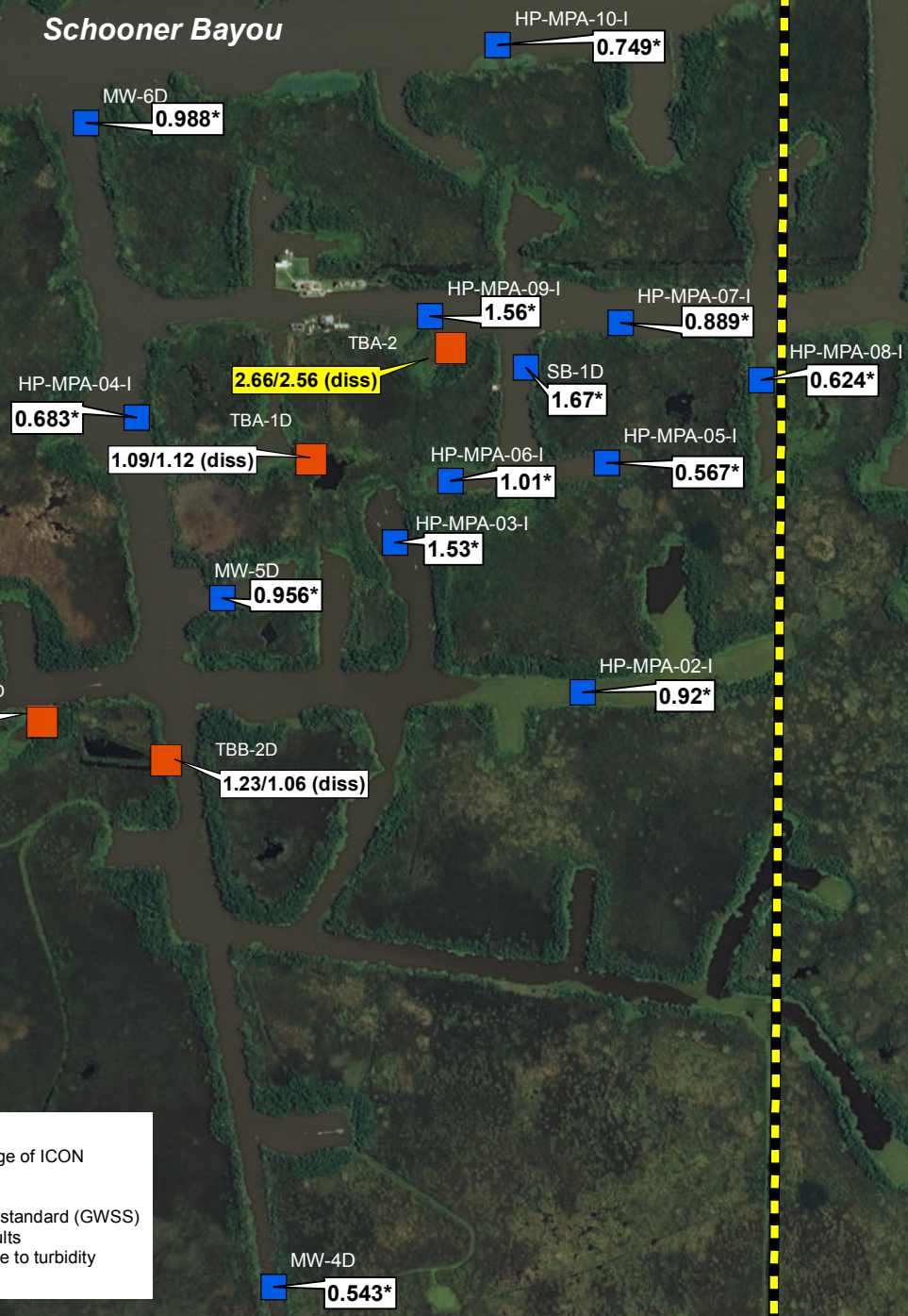
Figure 5-10 SUPPL
40 to 60 Foot Zone – Chlorides Concentrations
East White Lake Field
Vermillion Parish, Louisiana

Michael Pisani & Associates Inc.
Environmental Consulting Services
Baton Rouge LA New Orleans LA Houston TX

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Schooner Bayou



Notes:
1. Results posted are the average of ICON and MP&A split results in mg/L
2. Highlighted values exceed RECAP groundwater screening standard (GWSS)
3. (Diss) refers to dissolved results
4. * refers to filtered samples due to turbidity
5. GWSS=2 mg/L

Legend

- Section 16 Township 15 S Range 01 E
- Groundwater Zone**
- 70-90ft
- Supplement

Source: 2013 Aerial (ESRI)



Figure 5-11a SUPPL
70 to 90 Foot Zone – Barium Concentrations

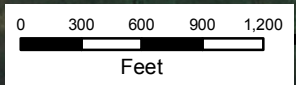
East White Lake Field
Vermillion Parish, Louisiana

Michael Pisani & Associates Inc.

Environmental Consulting Services
Baton Rouge LA New Orleans LA Houston TX

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Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-11a 70 to 90 ft Zone - Barium Concentrations.mxd



Schooner Bayou

Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-11b 70 to 90 ft Zone - Chlorides Concentrations.mxd

Legend

- Section 16 Township 15 S Range 01 E
- Groundwater Zone**
- 70-90ft
- Supplement

Notes:
1. Results posted are the average of ICON and MP&A split results in mg/L

Source: 2013 Aerial (ESRI)



Figure 5-11b SUPPL
70 to 90 Foot Zone – Chlorides Concentrations

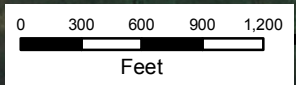
*East White Lake Field
Vermillion Parish, Louisiana*

Michael Pisani & Associates Inc.

Environmental Consulting Services
Baton Rouge LA New Orleans LA Houston TX

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Schooner Bayou



Legend

Section 16 Township 15 S Range 01 E

Groundwater Zone

90 to 250ft

Supplement

Source: 2013 Aerial (ESRI)



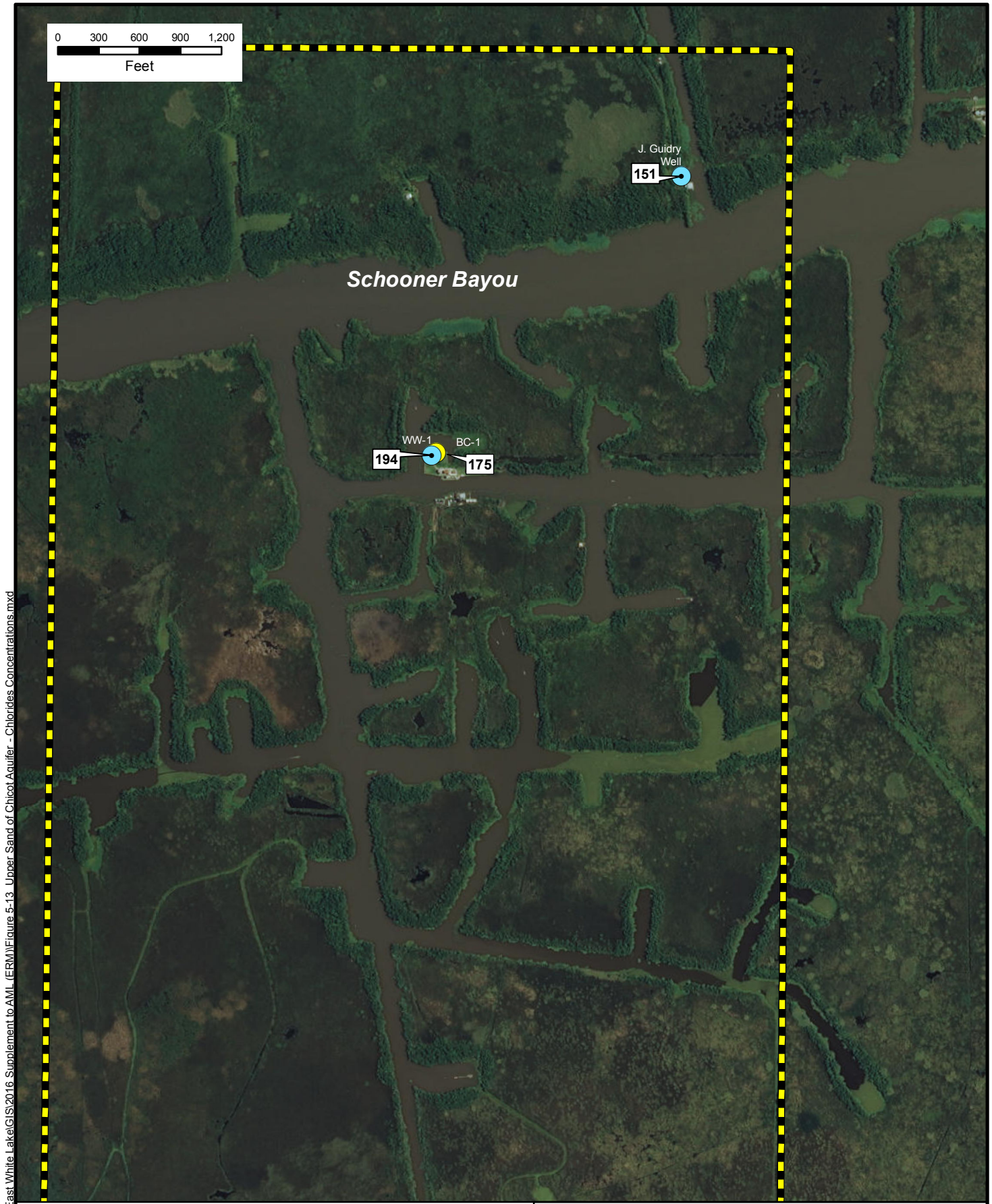
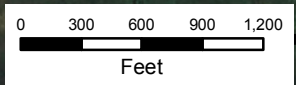
Figure 5-12 SUPPL
90 to 250 Foot Zone – Chlorides Concentrations
East White Lake Field
Vermillion Parish, Louisiana

Michael Pisani & Associates Inc.

Environmental Consulting Services
Baton Rouge LA New Orleans LA Houston TX

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Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-12 90 ft Zone - Chlorides Concentrations.mxd



Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-13 Upper Sand of Chicot Aquifer - Chlorides Concentrations.mxd

Legend



Section 16 Township 15
S Range 01 E

**Groundwater
Zone**



Chicot



Supplement

Notes:

- 1. Results posted are the average of ICON and MP&A split results in mg/L
- 2. Most recent sampling result (2010) shown for WW-1 (Facility Well)

Source: 2013 Aerial (ESRI)



Figure 5-13 SUPPL
Upper Sand of Chicot Aquifer – Chlorides Concentrations

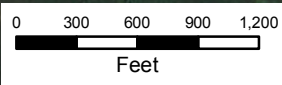
*East White Lake Field
Vermillion Parish, Louisiana*

Michael Pisani & Associates Inc.

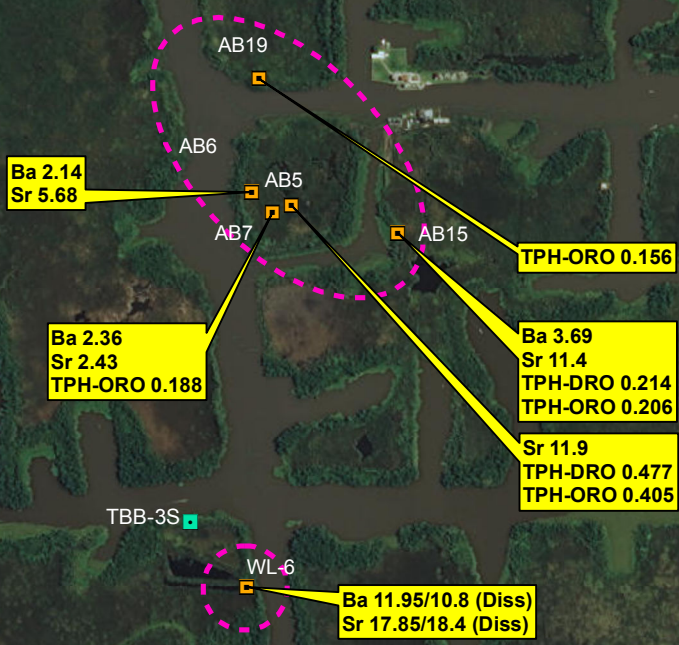
Environmental Consulting Services

Baton Rouge LA New Orleans LA Houston TX

Designed: AL	Drawn: MMH	Checked: LRC	Date: 2/16/2016	Project: 07-47
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Schooner Bayou



Legend

- Section 16 Township 15 S Range 01 E
- Area of Investigation
- Groundwater Zone**
 - Peat
 - Supplement

- Notes:
1. Highlighted values exceed RECAP ground water screening standard (GWSS)
 2. Results posted are the average of ICON and MP&A split results in mg/L
 3. Where duplicate samples were collected, maximum value is shown
 4. (Diss) refers to dissolved results

Source: 2013 Aerial (ESRI)



Figure 5-14 SUPPL
Preliminary AOIs for
Peat Zone Ground Water - Screening Level
*East White Lake Field
Vermillion Parish, Louisiana*

Michael Pisani & Associates Inc.

Environmental Consulting Services
Baton Rouge LA New Orleans LA Houston TX

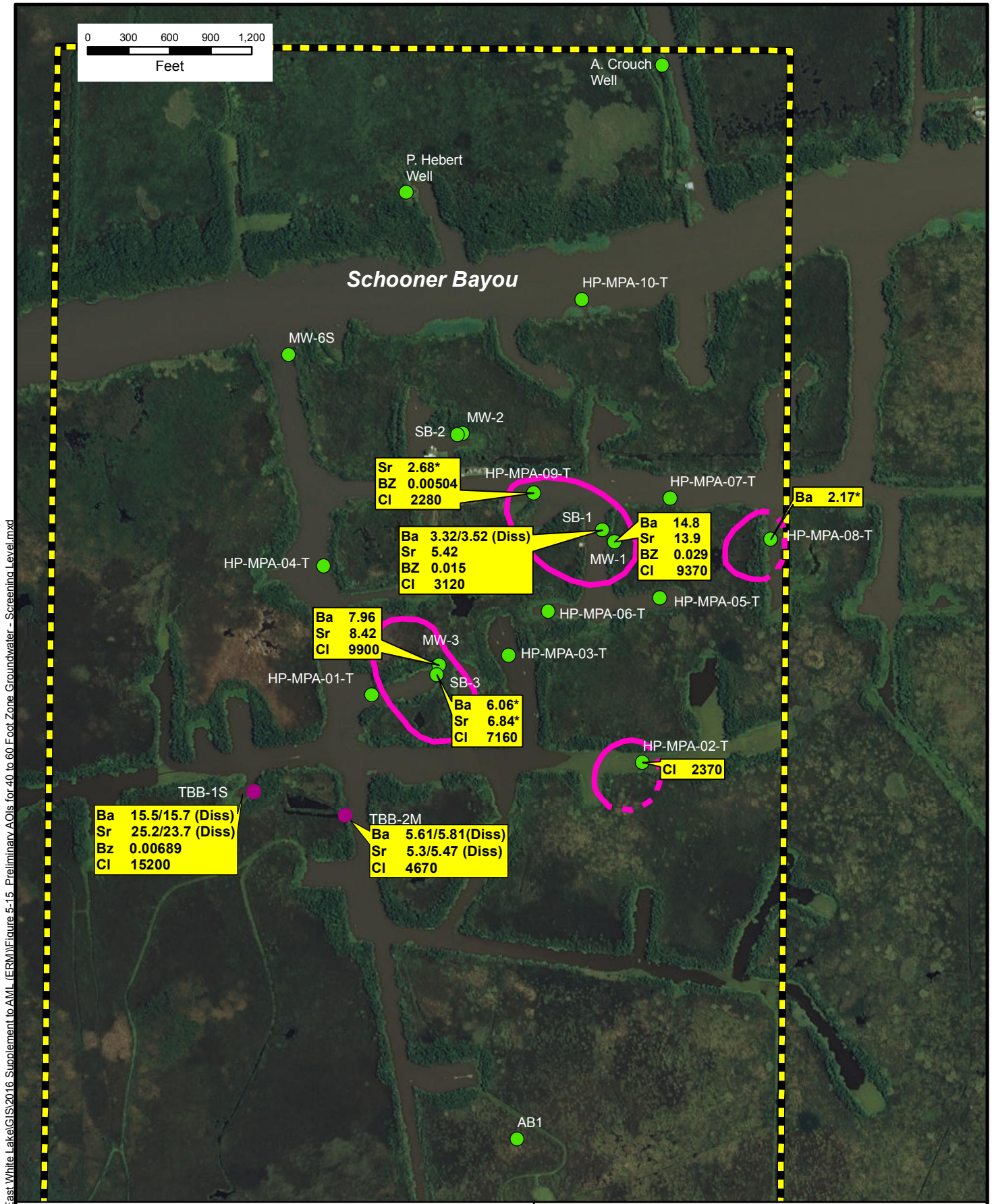
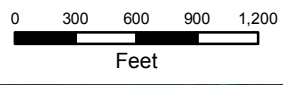
Designed: AL

Drawn: MMH

Checked: LRC

Date: 2/16/2016

Project: 07-47



Document Path: Z:\07-47 VP98 East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-15 Preliminary AOIs for 40 to 60 Foot Zone Groundwater - Screening Level.mxd

Legend

Section 16 Township 15 S Range 01 E

Area of Investigation

Groundwater Zone

40ft

Supplement

- Notes:
- 1. Highlighted values exceed RECAP ground water screening standard (GWSS)
 - 2. Results posted are the average of ICON and MP&A split results in mg/L
 - 3. Where duplicate samples were collected, maximum value is shown
 - 4. (Diss) refers to dissolved results
 - 5. * refers to filtered samples due to turbidity

Source: 2013 Aerial (ESRI)



Figure 5-15 SUPPL

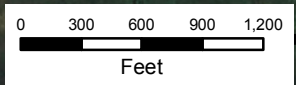
Preliminary AOIs for 40 to 60 Foot Zone
Ground Water – Screening Level

*East White Lake Field
Vermillion Parish, Louisiana*

Michael Pisani & Associates Inc.

Environmental Consulting Services
Baton Rouge LA New Orleans LA Houston TX

Designed: AL	Drawn: MMH	Checked: LRC	Date: 2/15/2016	Project: 07-47
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Schooner Bayou

BC-3

3.53/3.32 (diss)

BC-2

22.5/21 (diss)

BC-4

4.97/4.71 (diss)

Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-16 - 250ft Zone - Barium Concentrations.mxd

Legend



Section 16 Township
15 S Range 01 E



>250ft

Notes:

1. Highlighted values exceed RECAP groundwater screening standard (GWSS).
2. (Diss) refers to dissolved results
3. GWSS= 2 mg/L

Source: 2013 Aerial (ESRI)



Figure 5-16 SUPPL
>250 Foot Zone - Barium Concentrations

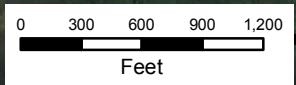
*East White Lake Field
Vermillion Parish, Louisiana*

Michael Pisani & Associates Inc.

Environmental Consulting Services

Baton Rouge LA New Orleans LA Houston TX

Designed: MMH	Drawn: MMH	Checked: LRC	Date: 2/16/2016	Project: 07-47
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Schooner Bayou

BC-3
<0.005

BC-2
0.2

BC-4
<0.005

Legend



Section 16 Township
15 S Range 01 E



>250ft

Notes:
1. Highlighted values exceed
RECAP groundwater screening
standard (GWSS)
2. GWSS= 0.005 mg/L
Source: 2013 Aerial (ESRI)



Figure 5-17 SUPPL
>250 Foot Zone - Benzene Concentrations

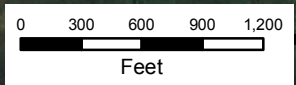
East White Lake Field
Vermillion Parish, Louisiana

Michael Pisani & Associates Inc.

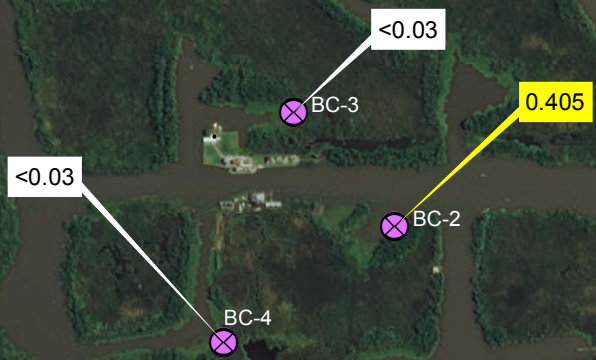
Environmental Consulting Services
Baton Rouge LA New Orleans LA Houston TX

Designed: MMH	Drawn: MMH	Checked: LRC	Date: 2/16/2016	Project: 07-47
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Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-17 - 250ft Zone - Benzene Concentrations.mxd



Schooner Bayou



Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-18 Suppl - TPH250.mxd

Legend

- Section 16 Township 15 S Range 01 E
- > 250 feet

Notes:
1. Highlighted values exceed RECAP groundwater screening standard (GWSS)
2. GWSS= 0.15 mg/L
Source: 2013 Aerial (ESRI)



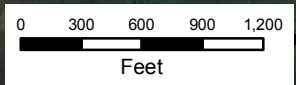
Figure 5-18 SUPPL
>250 Foot Zone - Aromatics >C8-C10 Concentrations

East White Lake Field
Vermillion Parish, Louisiana

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Schooner Bayou



Legend

- Section 16 Township
15 S Range 01 E
- > 250 feet

Source: 2013 Aerial (ESRI)



Figure 5-19 SUPPL
>250 Foot Zone - Chlorides Concentrations

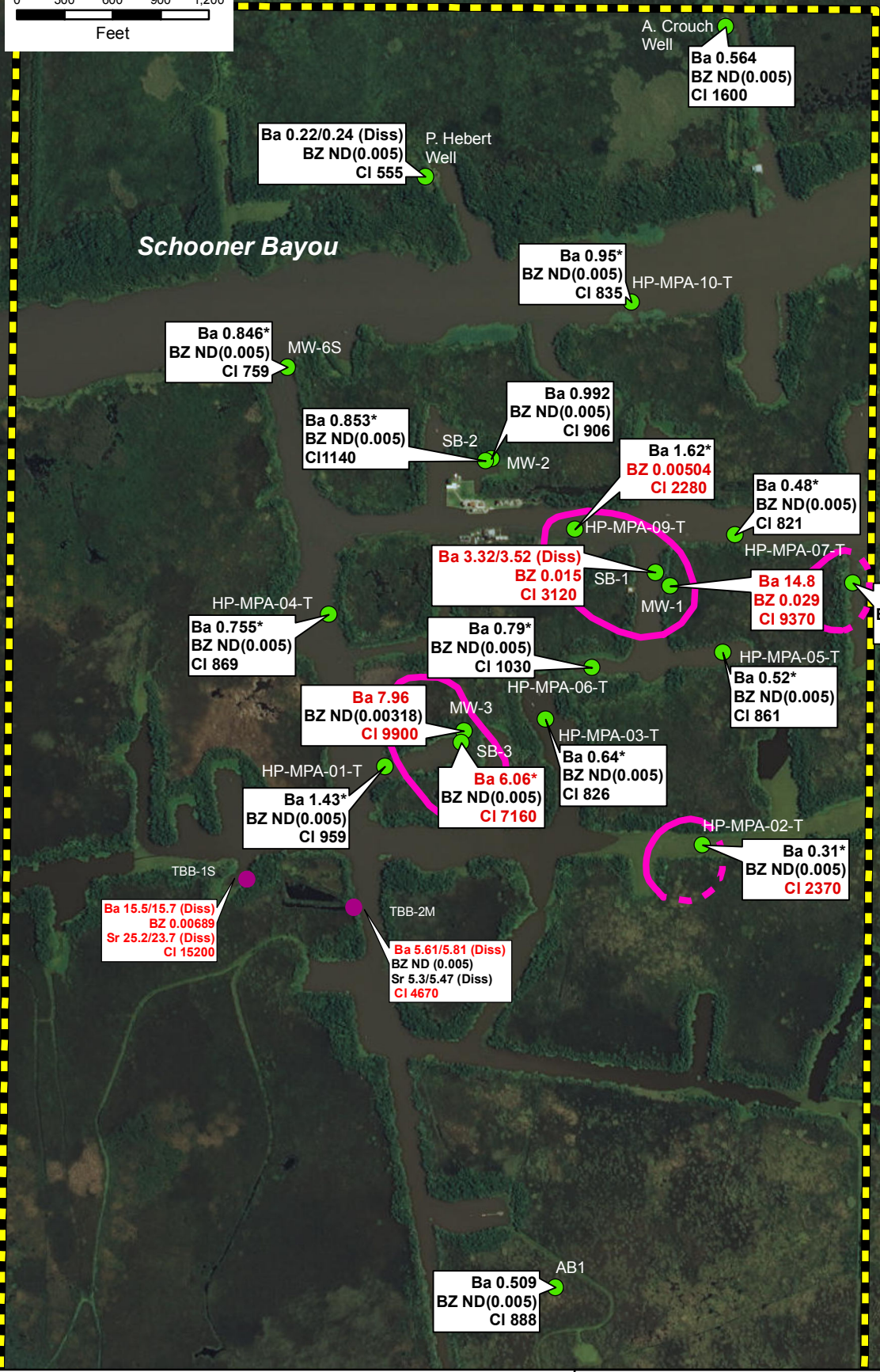
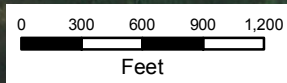
*East White Lake Field
Vermillion Parish, Louisiana*

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Baton Rouge LA New Orleans LA Houston TX

Designed: AL	Drawn: MMH	Checked: LRC	Date: 2/16/2016	Project: 07-47
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Document Path: Z:\07-47\VP58 East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 5-19 Suppl - Chlorides 250.mxd



Document Path: Z:\07-47 VPSB East White Lake\GIS\2016 Supplement to AML (ERM)\Figure 6-3 40 to 60 ft Zone Groundwater AOIs.mxd

Legend

Section 16 Township 15 S Range 01 E

AOI

Groundwater Zone

40ft

Supplement

- Notes:
1. Concentrations in red exceed GW2 RECAP Standard
 2. Results posted are the average of ICON and MP&A split results in mg/L
 3. Where duplicate samples were collected, maximum value is shown
 4. (Diss) refers to dissolved results
 5. * refers to filtered samples due to turbidity

Source: 2013 Aerial (ESRI)



Figure 6-3 SUPPL
40 to 60 Foot Zone Ground Water AOIs
Exceeding Default GW2 RECAP Standards

*East White Lake Field
Vermillion Parish, Louisiana*

Michael Pisani & Associates Inc.

Environmental Consulting Services

Baton Rouge LA New Orleans LA Houston TX

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Mr. Gary W. Snellgrove
February 17, 2016
Page 2

Best regards,

KEAN MILLER LLP

A handwritten signature in black ink, appearing to read "Brittany Buckley Salup", written in a cursive style.

Brittany Buckley Salup

BBS/kcb

Enclosures

cc: All counsel of record (Via E-mail w/Enc.)
Thomas E. Balhoff, Esq. (Via E-Mail w/ Enc.)