

**IN THE MATTER OF: H.C. DREW ESTATE, REPRESENTED BY ITS TRUSTEES,
LOUIE D. BARBE, III AND C.W. SHADDOCK V. NEUMIN PRODUCTION COMPANY
AND STOKES & SPIEHLER, INC.**

AGENCY NO. ENV-L-2022-01

**ON REFERRAL FROM THE 14TH JUDICIAL DISTRICT COURT
FOR THE PARISH OF CALCASIEU**

STATE OF LOUISIANA

DOCKET NO. 2019-4925

DIVISION "F"

H.C. DREW ESTATE

VERSUS

NEUMIN PRODUCTION COMPANY, ET AL.

NEUMIN PRODUCTION COMPANY'S AMENDED EXHIBIT LIST

Pursuant to the Commissioner's Conference Scheduling Order dated February 17, 2022, Neumin Production Company submits the attached amended list of exhibits ("Exhibit A") it may offer into evidence at the hearing in the above-captioned matter.

Respectfully Submitted:



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Attorneys for Neumin Production Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon all known counsel of record, the Louisiana Department of Natural Resources Commissioner of Conservation, and Thomas E. Balhoff, Hearing Officer, by electronic mail and/or U.S. mail, postage prepaid.

New Orleans, Louisiana, this 23rd day of March, 2022.



Claire M. Zeringue

H. C. Drew Estate v. Neumin Production Company, et al.
Office of Conservation Docket No. ENV-L-2022-01
Neumin Production Company's Exhibit List

<u>LDNR Exhibit No.</u>	<u>Party</u>	<u>Description</u>
1	Neumin	Site Investigation Report & Closure Work Plan - Neumin Limited Admission Plan of David G. Angle, P.G., CGWP, Angela M. Levert, and Lance R. Cooper, PhD, P.E., including all Figures, Tables, and Appendices, dated November 10, 2021
2	Neumin	Supplement to Site Investigation Report & Closure Plan - Neumin Limited Admission of David G. Angle, P.G., CGWP and Lance R. Cooper, PhD, P.E., including all Attachments, dated January 14, 2022
3	Neumin	Letter from John Funderburk, Kean Miller, to Richard P. Ieyoub, Louisiana Commissioner of Conservation, submitting Neumin's Limited Admission with LDNR signature receipt, dated November 10, 2021
4	Neumin	Letter from John Funderburk, Kean Miller, to Richard P. Ieyoub, Louisiana Commissioner of Conservation, and Gary Snellgrove, Director of Environmental Division, Office of Conservation, submitting Neumin's Supplement to Site Investigation Report & Closure Plan - Neumin Limited Admission, dated January 14, 2022
5	Neumin	Email correspondence between Gary Snellgrove, Director of Environmental Division, Office of Conservation, John Funderburk, Kean Miller, and Mike Veron, Veron, Bice, Palermo & Wilson, LLC, regarding status of Neumin's check for funding, dated November 11-December 7, 2022
6	Neumin	Letter from John Funderburk, Kean Miller, to Richard P. Ieyoub, Louisiana Commissioner of Conservation, attaching check from Formosa Plastics Corporation, dated December 7, 2021
7	Neumin	Neumin's Limited Admission Pursuant to La. R.S. 30:29, dated October 14, 2021
8	Neumin	Neumin's Motion for Referral to LDNR for Development of Feasible Plan Pursuant to La. R.S. 30:29, dated October 14, 2021
9	Neumin	Court's Order granting Neumin's Motion for Referral to LDNR for the Development of the Most Feasible Plan, dated October 25, 2021
10	Neumin	Court's Order granting LDNR's Motion for Extension of Time to Conduct a Public Hearing, dated February 8, 2022
11	Neumin	Plaintiff's Responses to Neumin's Site Investigation Report and Closure Work Plan, including Letter from Turner Brumby, Veron, Bice, Palermo & Wilson, LLC, to Richard P. Ieyoub, Louisiana Commissioner of Conservation, and Gary Snellgrove, Director of Environmental Division, Office of Conservation, Comments prepared by R. Brent Bray of RBB Consulting, LLC, and Affidavit of Louie D. Barbe, III, with exhibit, dated February 14, 2022

12	Neumin	Neumin's Public Notice of LDNR Hearing - Office of Conservation Docket No. ENV-L-2022-01
13	Neumin	Letter from Claire Zeringue, Kean Miller, to Clerk of Court of 14th JDC, submitting Neumin's Notice of Public Hearing before LDNR for public posting, dated March 8, 2022
14	Neumin	Letter from Claire Zeringue, Kean Miller, to the Office of Conservation, submitting Neumin's Notice of Public Hearing before LDNR for public posting, dated March 8, 2022
15	Neumin	Letter from Claire Zeringue, Kean Miller, to Division of Administrative Law, submitting Neumin's Notice of Public Hearing before LDNR for public posting, dated March 8, 2022
16	Neumin	Letters from Claire Zeringue, Kean Miller, to All Counsel, submitting Neumin's Notice of Public Hearing before LDNR, dated March 8, 2022 and March 11, 2022
17	Neumin	FedEx Confirmation of Delivery of Claire Zeringue, Kean Miller, to Clerk of Court of 14th JDC, submitting Neumin's Notice of Public Hearing before LDNR, dated March 9, 2022
18	Neumin	FedEx Confirmation of Delivery of Claire Zeringue, Kean Miller, to the Office of Conservation, submitting Neumin's Notice of Public Hearing before LDNR, dated March 10, 2022
19	Neumin	FedEx Confirmation of Delivery of Claire Zeringue, Kean Miller, to Division of Administrative Law, submitting Neumin's Notice of Public Hearing before LDNR, dated March 11, 2022
20	Neumin	Copy of certified mailing envelopes, certified mail cards and receipts for mailings to J. Michael Veron, Shayna L. Sonnier, Michael G. Durand, Joseph P. Guichet, Michael D. Peytavin, and Jennifer E. Michel
21	Neumin	Certified Mail confirmation of delivery to J. Michael Veron, dated March 17, 2022
22	Neumin	Certified Mail confirmation of delivery to Shayna L. Sonnier, dated March 11, 2022
23	Neumin	Certified Mail confirmation of delivery to Michael G. Durand (Pending)
24	Neumin	Certified Mail confirmation of delivery to Joseph P. Guichet, received prior to March 16, 2022 (Undated)
25	Neumin	Certified Mail confirmation of delivery to Michael D. Peytavin, dated March 10, 2022
26	Neumin	Certified Mail confirmation of delivery to Jennifer E. Michel, dated March 14, 2022
27	Neumin	Email correspondence from Maureen Tydlaska, Kean Miller, to Tami Mallett, American Press, requesting publication of Notice of LDNR hearing in the Lake Charles American Press newspaper on behalf of Neumin Production Company, with attached Notice, dated March 2, 2022

28	Neumin	Email correspondence from Tami Mallett, American Press, to Maureen Tydlaska, Kean Miller, acknowledging receipt of publishing request and forwarding paid invoice for ad publication, dated March 3, 2022
29	Neumin	Affidavit of Publication of Notice in the American Press, Lake Charles, Louisiana, dated March 8, 2022
30	Neumin	Copy of American Press newspaper of published Notice, dated March 8, 2022
31	Neumin	Email correspondence from Thomas E. Balhoff to all counsel forwarding Affidavit of Publication of Notice in the Advocate by LDNR, dated March 9, 2022
32	Neumin	Affidavit of Publication of Notice in the Advocate on February 26, 2022
33	Neumin	Email correspondence between Gary Snellgrove, Director of Environmental Division, Office of Conservation, and Lance R. Cooper, PhD, P.E., Environmental Resources Management, regarding site visit attendance, dated February 16, 2022
34	Neumin	Commissioner's Conference and Scheduling Order, dated February 17, 2022
35	Neumin	J.J. Schuurman and M. A. J. Goedewaagen, "Methods for the Examination of Root Systems and Roots; Methods in Use at the Institute for Soil Fertility for eco-morphological root investigations", Center for Agricultural Publishing and Documentation, Wageningen, 1971
36	Neumin	JKW-RM, "Prairieland Series", National Cooperative Soil Survey, U.S.A., April 2016
37	Neumin	BAT-DRM-RM, "Vidrine Series", National Cooperative Soil Survey, U.S.A., February 2018
38	Neumin	National Resources Conservation Service, "Calcasieu Parish, Louisiana", Web Soil Survey, March 17, 2022
39	Neumin	United States Department of Agriculture, Soil Conservation Service, "Soil Survey of Calcasieu Parish, Louisiana", 1988
40	Neumin	JJD-DR-RM, "Midland Series", National Cooperative Soil Survey, U.S.A., May 2014
41	Neumin	DRM-JKW-RM, "Mowata Series", National Cooperative Soil Survey, U.S.A., May 2014
42	Neumin	Freshet, Grégoire T., et al., "A starting guide to root ecology: strengthening ecological concepts and standardising root classification, sampling, processing and trait measurements", New Phytologist, Community Resources Forum, March 22, 2021
43	Neumin	Louisiana Department of Natural Resources, Office of Conservation's Most Feasible Plan Developed and Submitted as Required by La. R.S. 30:39, Docket No, ENV-L-2013-02, <i>IN RE: Agri-South, L.L.C., et al. v. Exxon Mobil Corporation, et al.</i> , Docket No. 24, 132, 7th Judicial District Court, Parish of Catahoula, mandated October 3, 2013
44	Neumin	Memorandum to Richard P. Ieyoub, Commissioner of Conservation, from John W. Adams, Attorney, LDNR/Office of Conservation, regarding Landowner Consent, December 12, 2018
45	Neumin	RECAP evaluation tables that include data collected during Plaintiff's November 2021 investigation activities following submission of Neumin's Limited Admission Plan dated November 10, 2021

46	Neumin	U.S. EPA (U.S. Environmental Protection Agency). 2015. Determination of the Biologically Relevant Sampling Depth for Terrestrial and Aquatic Ecological Risk Assessments. National Center for Environmental Assessment, Ecological Risk Assessment Support Center, Cincinnati, OH. EPA/600/R-15/176.
47	Neumin	Ritchie, Patrick M., PWS, Curriculum Vitae, 2021
48	Neumin	Angle, David G., P.G., CGWP, Curriculum Vitae, 2021
49	Neumin	Cooper, Lance R., PhD, P.E., Curriculum Vitae, 2021
50	Neumin	Levert, Angela M., Curriculum Vitae, 2021