



# Veron, Bice, Palermo & Wilson, LLC

February 14, 2022

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RE: H. C. Drew Estate  
vs. (No. 2019-4925 "F")  
Neumin Production Company, et al.  
LDNR Docket No. ENV-L-2022-01

Gentlemen:

Our law firm represents the plaintiff, the H.C. Drew Estate (the "Drew Estate") in the above referenced matter. One of the defendants in the case, Neumin Production Company ("Neumin"), filed a limited admission in this matter on or about October 14, 2021.

As we have previously informed you, we presently do not intend to participate in any proceedings or hearing before the Louisiana Department of Natural Resources ("LDNR") pertaining to Neumin's limited admission because, among other issues: (1) under its contracts with our client, Neumin is obligated to restore the Drew Estate property to its pre-oil and gas condition, rather than to some lesser standard or regulatory requirement; and (2) Neumin has not complied with the applicable laws and rules governing the limited admission proceedings.

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Nonetheless, in accordance with the applicable statutes and regulations, we are submitting the attached comments prepared by R. Brent Bray of RBB Consulting, LLC in response to the site investigation plan previously submitted by ERM on Neumin's behalf (as supplemented on or about January 14, 2022). We are also submitting an affidavit on behalf of the landowner for LDNR'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 the Drew Estate's bargained-for rights under its contracts with Neumin for the restoration of its property to its pre-oil and gas condition. Thus, the Drew Estate does not waive any of those rights and maintains all its objections to the limited admission hearing before LDNR, as well as its objections to any plans or evidence that arise out of or relate in any way to these proceedings. Specifically, the Drew Estate continues to expect Neumin to do what it promised in writing to do in the contracts that allowed it to go onto the Drew Estate property and drill the well in question. To that end, the Drew Estate likewise reserves all objections to the admissibility of any evidence pertaining to these proceedings that in any way attempts to limit its 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. 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:YH

cc: Mr. Jonathan Rice (via e-mail)  
Mr. Tom Balhoff (via e-mail)  
All counsel of record (via e-mail)  
Ms. Jamie Love (via e-mail)  
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