

APPENDIX H
RESUMES AND LIST OF TESTIMONY EXPERIENCE



Gregory W. Miller, P.G.
ICON Environmental Services, Inc.
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Qualifications Summary

Geologist and project manager with over twenty years of professional experience in the Gulf Coast and northeastern United States area. Extensive experience in all aspects of groundwater sciences, including project planning, field methods, data evaluation, report preparation, modeling, predictive analysis, fate and transport analysis, regulatory liaison, and project management. Routinely involved with evaluations of hydrology and geochemical interaction of vadose zone, surface water, and groundwater regimes; frequently perform surface and borehole geophysical investigations. Commonly develop and implement innovative field characterization methods.

Professional Experience

- (5/94 - Present) ICON Environmental Services; Baton Rouge, LA
Sr. Geologist/Principal Hydrogeologist; Corporate President
- (8/91 - 5/94) Environmental Consulting & Technology, Inc.; Baton Rouge, LA
Sr. Staff Geologist/Hydrogeology Department Manager
- (6/90 - 2/91) Woodward-Clyde Consultants; Baton Rouge, LA; *Staff Geologist*
- (12/86 - 6/90) The Johnson Company, Inc.; Montpelier, VT; *Project Geologist*
- (6/86 – 12/86) Industrial and Environmental Analysts; Essex Junction, VT; *Scientist*
- (5/83 - 2/86) Core Laboratories, Inc.; Lafayette, LA; *Log and Core Analyst*

Selected Relevant Project Experience

INNOVATIVE TECHNOLOGY

Project Manager, Principal Hydrogeologist; Subsurface Assessment Using Innovative Technology; US NAVY, Jacksonville, LA – Developed innovative procedure for subsurface assessment utilizing direct push methods. Lithology is determined through sealed casing using borehole geophysics. A small diameter permanent well is installed through the sealed casing, and includes proper grout to surface. Two sites were characterized using the new technology, and using conventional technology. The results of the two methods were compared, and results were presented to the FDEP and EPA, and were used to fulfill contaminant investigation requirements as per the site HSWA permit.

“Missing Link Technology” – Utilize direct push tooling to allow sampling of groundwater, natural gamma logging of soils for lithological characterization, and pressure grouting for permeability reduction. The technology, patented by ICON personnel, relies on hammering a screen or tool port ahead of the primary string to allow sampling or grouting in the permeable zone of interest, while maintaining a hydraulic seal around the primary string due to lithological compaction.

CONTAMINATION ASSESSMENT, REMEDIATION, RISK ASSESSMENT

Project Manger and Principal Investigator; RECAP Risk Assessment, Shreveport Atlas Refinery – Project involved review of historical aerial photos to identify former process locations. All historical environmental data ever generated at the subject refinery were used to develop a site-specific fate and transport model, to which resulting constituent concentrations at the point of exposure were evaluated using the Louisiana RECAP protocol. Conducted soil and groundwater

delineation assessment to characterize 18 areas of concern, including parameters for natural attenuation modeling.

Project Manager; Hydrogeological Assessments; Boeing Petroleum Services, Inc.--Six Department of Energy Strategic Petroleum Reserve sites in Louisiana and Texas were screened for groundwater contamination using a limited soil boring program, soil gas surveys, and electromagnetic terrain conductivity surveys. Data were evaluated and presented with pertinent historical site specific information in a report with recommendations for verification sampling.

Project Manager; Groundwater Contamination Delineation and Corrective Action; Exxon Company, USA--Delineated the extent of a brine plume at a former gas plant including the rapid-assessment technique of drive-point sampling, and vertical discrete groundwater sampling. Conducted a pumping test of an existing well, predictive groundwater modeling, and designed and installed a groundwater recovery system.

Project Manager; Groundwater Assessment and Remediation, Tensas Parish Police Jury--Delineated the extent of subsurface impact from petroleum fuels at a maintenance facility; assessment included installation of borings and monitor wells, and the rapid-assessment technique of drive-point sampling and a soil gas survey. Conducted a limited risk assessment with remedial action plan selection. Implemented excavation of 7000 yards³ of soil and onsite treatment using biodegradation/volatilization, and groundwater extraction and treatment using air stripping; utilized client's machinery and labor as available to minimize total project costs.

Principal Investigator; Oil Industry Subsurface Assessments, Exxon Company, U.S.A., Vastar Resources, Inc., and Others- Evaluated historical aerial photographs to document past field development and impacts. Conducted comprehensive evaluation of subsurface soils and groundwater for impacts from past oil and gas activities including impacts by petroleum hydrocarbons, heavy metals, and brine at gas plants, bulk storage tank sites, and shorebase facilities. Conducted a Risk Based Corrective Evaluation for closure and/or remedial goals.

Project Geologist/Field Coordinator; Exxon Chemical Company--Completed a detailed soil and groundwater assessment at three areas within a tank farm. Successfully conducted field investigations under a very restricted schedule by coordinating four simultaneously operating field crews. Compiled a report including data assessment, hydrogeological conditions, and corrective action design, and presented the results to regulatory authorities.

Project Manager; Hydrogeologic and Contaminant Assessment, Calumet Refining Company, Cotton Valley, LA; Delineated the lateral extent of a petroleum hydrocarbon plume at a specialties (solvent, thinners) refinery; conducted risk assessment and developed a corrective action plan.

Project Manager; Underground Storage Tank Assessment Sites in Louisiana; Various Clients-Manage assessment and remedial activities at numerous underground storage tank sites. Activities include UST removal, preliminary assessment, contaminant assessment, remedial alternatives analysis, and corrective action planning and implementation.

Staff Geologist; Local Contamination Assessment, Confidential Client, Various Locations-- Completed soil and groundwater investigations for PCB contamination at petroleum pipeline compressor stations throughout Mississippi.

GROUNDWATER CHARACTERIZATION AND MONITORING SYSTEM DESIGN

Project Manager; Hydrogeologic Evaluation, Tensas Parish Municipal Landfill, St. Joseph, LA- Conducted comprehensive hydrogeological evaluation in compliance with US EPA Subtitle D Regulations, including the installation of shallow and deep exploratory borings and monitoring wells, borehole geophysical wireline logging, and several years of monitoring well sampling and data evaluation.

Project Geologist; Freeport McMoran, Inc.--Designed vadose zone monitoring program to determine the suitability of using phosphogypsum as a roadbase material. The program included the installation of 33 lysimeters, and six groundwater monitoring wells, sampled over a six year period.

Principal Investigator; Pennzoil Products Company, Atlas Refinery, Shreveport, LA – Conducted site-wide subsurface characterization using conventional boring data, CPT data, borehole geophysical data, and hydraulic head data from existing wells. Designed perimeter groundwater monitoring system.

Hydrogeologist; Sabine Parish Landfill, La – Completed site-wide hydrogeologic evaluation and monitoring well network design using conventional and borehole geophysical data.

Project Geologist; Arrowhead Cogeneration Corporation--Determined site suitability for subsurface wastewater disposal, by performing soil and groundwater investigations, wastewater renovation studies (laboratory models), and pilot loading tests. Utilized computer models to predict effects of hydraulic loading. Acquired permits and designed compliance monitoring program.

LITIGATION SUPPORT AND EXPERT WITNESS TESTIMONY

Hydrogeology Expert; Long Point Partners, L.P. – Evaluated and modeled the potential for caprock dissolution and the potential for subsequent subsidence at a solid waste landfill site. Provided an expert report, provided deposition and trial testimony at an adjudicatory in Austin, Texas. Was accepted as an expert in the field of Hydrogeology.

Geology, Hydrogeology and Site Assessment Expert - Norfolk Southern Corp. et al v. California Union Insurance Company and Certain Underwriting Members of Lloyds: Pearl River, Bayou Bonfouca, Southern Wood Piedmont Site, Jennison Wright Facility, Baystreet Site, and Oneida Site Sites. – Provided comprehensive hydrogeological evaluation and review of historical aerial photography and contamination distribution at each site, rendered expert reports, provided deposition testimony and trial testimony in a four-year long litigation (1998-2002) involving numerous sites previously operated by Norfolk Southern Corp. who was attempting to recover costs for historical remediation at each site. Was recognized as an expert in Geology, Hydrogeology and Site Assessment during five separate trials in the 19th Judicial District Court, Baton Rouge, LA.

Geology, Hydrogeology and Site Assessment Expert - Davison Transport, Inc. and Melamine Decorative Laminate v United Technologies Automotive, Inc., the City of Ruston, and Essex Group. Designed and managed a subsurface assessment, developed a corrective action plan, provided deposition testimony and trial testimony as an expert in the fields of Hydrogeology and Site Assessment and Remediation at the 3rd Judicial District Court, Lincoln Parish, 1999 to 2000.

Geology, Hydrogeology and Site Assessment Expert, Project Manager and Principal Investigator – Numerous Oil and Gas Field Assessments in Louisiana. Performed comprehensive site assessments of over 100 oil field sites for various plaintiffs using surface geophysics (electromagnetic surveys), historical aerial photograph interpretation, borehole screening tools (conductivity probing and borehole geophysical surveys), installation of groundwater monitoring wells, collection and evaluation of soil and groundwater samples, sediment sampling, sludge sampling, aquifer testing, and review of historical records. Provided expert reports and deposition and trial testimony for various District Court and Federal Court venues. Successfully defended methodology and qualifications at numerous Daubert hearings and was recognized by the court as an expert in the fields of Geology, Hydrogeology, Site Assessment, Regulatory Liaison, and Implementation of the Louisiana Department of Environmental Quality’s “Risk Evaluation and Corrective Action Program” (RECAP). Evaluated data in accordance with standards in Louisiana Department of Natural Resources regulations, Act 312 procedures and the LDEQ RECAP document; and performed predictive groundwater modeling to design groundwater remediation systems.

Geology, Hydrogeology and Site Assessment Expert - Firemen’s Charitable & Benevolent Association of New Orleans v Orkin, Inc. Performed a site assessment at a former pesticide management facility in New Orleans. The assessment included soil and groundwater sampling. Provided deposition and trial testimony in United States District Court, Section S (2005-2006). Was recognized by the court as an expert in the areas of geology, hydrogeology and site assessment.

SITE ASSESSMENT AND RISK MINIMIZATION EVALUATION AND PLANNING

Project Manager; Environmental Audit, Exxon Company, U.S.A., Production Department--

Managed and performed inspections of 40 non-hazardous waste disposal/treatment sites in five states. The project involved assessment of compliance with regulation, potential/degree of environmental impact, and conformance to good management practices.

Principal Author; OPA and SPCC Plans, Exxon Company, Jordon Oil Company, Lemoine Distributors, S&W Services. Etc. --

Designed and compiled vessel and facility response plans for the northern Gulf of Mexico region and inland waters in accordance with the Oil Pollution Act of 1990 (OPA '90) regulations. The plans were interactive, designed for ease of site-specific modification and use in the event of a spill. SPCC plans were designed as per 40 CFR, Part 112, for aboveground storage tanks in excess of 1,320 gallons.

Phase I and II Transaction Site Assessments – Numerous clients in Louisiana and Mississippi

-- Performed assessment for real estate and oil production property transaction using site specific methods, ASTM guidelines, and Nations Bank protocol. Routinely utilize document review, historical aerial photographs, and process knowledge to preliminarily identify areas of concern.

Project Manager; Phase I and II Environmental Site Assessment; Confidential Client--

Conducted surface and sub-surface assessment at an oilfield pipe reconditioning yard in Lafayette, Louisiana, for contamination by hydrocarbons, heavy metals, and naturally occurring radioactive material (NORM).

LAND PLANNING AND PERMITTING

Project Manager; Cabot Cooperative Creamery--Developed a land application-nutrient recovery program for a dairy manufacturing facility with a wastewater load of 100,000 gallons per day. Performed site evaluations, wastewater fate analysis, receiving stream impact analysis, report preparation, permit acquisition, and groundwater monitoring. The project involved field identification of soils at 150 agricultural sites, with emphasis on predicting seasonal saturation. The entire project proceeded under close scrutiny of organized area residents.

Project Geologist; Rainbow Trust, Inc.--Performed evaluation of 450 acres to assess potential for residential development. Evaluations included water supply development (involving geophysical surveys, aerial photography and fracture trace analysis), subsurface sanitary wastewater disposal, groundwater modeling using *Modflow*, soils identification for wetlands delineation, and land planning (access, roads, etc.).

Project Manager; Wastewater Discharge Permitting, Kraft Foods, Inc, Various Truck Washing and Barge Rehab Facilities --

Acquired surface discharge permit for disposal of non-contact cooling water, industrial water, residual contents, and stormwater. Utilized water quality sampling, stream and effluent discharge measurements, and a dye study to perform a thermal assimilation study.

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LIST OF LITIGATION TESTIMONY

Anne Anderson et al v Cryovac a Division of W.R. Grace & Co. et al, US District Court District of Massachusetts, Civil Action No. 82-1672-S (1984-1985) Assisted in preparation of defense for Unifirst Corporation, Woburn, Massachusetts for litigation in the contamination of two water supply wells, Wells G & H.

Lorio v Western Waste Industries. Pointe Coupee Parish. (Judge Jack Marrioneaux). Fact witness. Provided deposition and preparation for trial. Case Settled ~ 1997.

Ostheimer v VenVirotek of Louisiana. Lafourche Parish.. Provided expert opinion (written report), and deposition testimony. Case Settled ~1998.

Wayne Simoneaux et.al. v Amoco, 23rd Judicial District Court, Assumption Parish, Division D. 1998-2000, Assumption Parish, Louisiana. Performed hydrogeological assessment and provided multiple deposition and trial testimony as a fact witness.

Adjudicatory Hearing for Application of Long Point Partners, L.P. for Permit No. MSW-2270, July 2000, Austin, Texas. Provided expert opinion (written report), deposition and hearing testimony. Was accepted as an expert in the field of Hydrogeology.

Tensas Parish Police Jury v Louisiana Department of Environmental Quality, 1997. Provided deposition testimony as fact witness.

Norfolk Southern Corp. et al v. California Union Insurance Company and Certain Underwriting Members of Lloyds, Baton Rouge, Louisiana: Pearl River, Bayou Bonfoucca Sites. September 1998-October 1999. Provided expert opinion (written report), multiple deposition testimony, and bench and jury trial testimony regarding the Pearl River site in Louisiana. Was recognized as an expert in the field of Geology.

Norfolk Southern Corp. et al v. California Union Insurance Company and Certain Underwriting Members of Lloyds, et al: Southern Wood Piedmont Site. 1999-2000, 19th Judicial District Court, Division D, East Baton Rouge Parish, LA. Provided expert opinion (written report), deposition testimony, and trial testimony regarding the Southern Wood Piedmont site in Macon, Georgia. Was recognized as an expert in the field of Geology.

Norfolk Southern Corp. et al v. California Union Insurance Company and Certain Underwriting Members of Lloyds, et al, Jennison Wright Facility. November 2001. 19th Judicial District Court, Division D, East Baton Rouge Parish, LA. Provided expert opinion, deposition testimony, and trial testimony regarding the Jennison Wright Facility in Toledo, Ohio. Was recognized as an expert in the field of Geology.

Norfolk Southern Corp. et al v. California Union Insurance Company and Certain Underwriting Members of Lloyds, et al, Baystreet Site. December 2001. 19th Judicial District Court, Division D, East Baton Rouge Parish, LA. Provided expert opinion, and deposition testimony. Provided evidence that led to a successful motion for judgement as a matter of law regarding the Baystreet Tank Facility in Savannah, Georgia.

Norfolk Southern Corp. et al v. California Union Insurance Company and Certain Underwriting Members of Lloyds, et al, Oneida Site. January-February 2002. 19th Judicial District Court, Division D, East Baton Rouge Parish, LA. Provided expert opinion, and deposition testimony concerning the Oneida, Tennessee rail yard.

Davison Transport, Inc. and Melamine Decorative Laminate v United Technologies Automotive, Inc., the City of Ruston, and Essex Group, 3rd Judicial District Court, Lincoln Parish, 1999,2000. Conducted subsurface assessment and developed a corrective action plan. Provided deposition testimony and trial testimony as an expert in the fields of Hydrogeology and Site Assessment and Remediation.

Mary Michael Morril v Shell Oil Company, 23rd Judicial District Court, Division A, May 2001. Conducted site assessment of an active oilfield using surface and borehole geophysical surveys, conventional drilling and sampling techniques and monitor well installation and sampling. Provided expert opinion and deposition testimony.

B&C Land, Inc and Hackberry Farms v Exxon Mobil Corporation, et al, 23rd Judicial District Court, Division D, St. James Parish, LA. November 2002. Conducted site assessment of a former brine pit, injection well, and former oil and gas production locations in the Vacherie Field. Provided deposition testimony.

Martinez Seafood v Thibaut Oil, 23rd Judicial District Court, Ascension Parish, LA. December 2001. Performed removal of UST, remediation of impacted soils, groundwater monitoring and site closure. Provided deposition testimony.

Victor Vegas and Jane Vegas v Miller Exploration Company, et al, Civil District Court, Orleans Parish, LA. August 2002. Conducted site assessment of gas well blowout in Foules Dome Field, Catahoula Parish, LA. using surface and borehole geophysics, conventional drilling and sampling techniques, and the installation of nested monitoring wells to a depth of 200 feet. Provided deposition testimony.

Vienne v Conoco, Inc., 15th Judicial District Court, Division C. May 2004. Performed a site assessment of an oilfield and former gas fractionation plant using surface geophysical surveys, NORM screening, and soil and water sampling. Provided deposition testimony.

J. Paulin Duhe, Inc. v Texaco, Inc., et al., 16th JDC, Iberia Parish, Louisiana. November 2004 and June 2005. Performed a site assessment at an oilfield in south Louisiana that included production facilities, salt water injection wells, former pits, and separation/fractionation facilities. The assessment included surface geophysical

surveys, direct push conductivity logging, soil and groundwater sampling, and NORM screening. Provided deposition testimony.

Armelise Planting Company, et al v. BP Amoco, et al., 23rd JDC, Assumption Parish, Louisiana. December 2004. Performed a site assessment at the Napoleonville Oilfield in south Louisiana that included former production facilities, salt water injection wells, former pits, and separation/fractionation facilities. The assessment included surface geophysical surveys, direct push conductivity logging, borehole geophysical logging, soil and groundwater sampling, and NORM screening. Provided deposition testimony.

Cheryl Lanoux, et al v. Crompton Manufacturing Company, Inc., et al, 23rd JDC, Ascension Parish, Louisiana, February 2005. Performed a site assessment of an uncontrolled hazardous waste dumping site that had historically received toluene tars and sludge. The dumping site was later developed for private residences and a child daycare facility. The assessment included soil and groundwater sampling; surface water and sediment sampling; and determination of groundwater flow direction, velocity and estimated yield and interaction with an adjacent surface water body. The shallow regional geological regime was evaluated using drillers logs of registered water wells within a two mile radius. Provided deposition testimony.

Weeks, et al v. Shell, 23rd JDC, St. Mary Parish, Louisiana, May 2005. Performed limited site assessment including soil and sludge/sediment sampling, and shallow groundwater sampling at a former oil and gas field in a South Louisiana Marsh. Provided deposition testimony.

Armelise Planting Company, et al v. BP Amoco, et al., 23rd JDC, Assumption Parish, Louisiana. August 2005. Performed a site assessment at active salt dome storage facilities on Napoleonville Dome. The assessment included surface geophysics, conductivity probing, and shallow soil and groundwater sampling at brine storage pits at two of the cavern wells. Performed water well sampling and cavern evaluation across the dome. Provided deposition testimony.

Firemen's Charitable & Benevolent Association of New Orleans v Orkin, Inc., United States District Court, Section S, December 2005 and March 2006. Performed a site assessment at a former pesticide management facility in New Orleans. The assessment included soil and groundwater sampling. Provided deposition testimony. Provided trial testimony as an expert in the areas of geology, hydrogeology and site assessment.

Grand Lake Rod & Gun Club Inc and Roy O. Martin Lumber Company, Inc. v BP America Production Company, et al, 12th Judicial District Court, Division B, Avoyelles Parish, Louisiana, February 2006. Performed a site assessment at Five Mile Bayou Field, Three Mile Bayou Field, and Milligan Bayou Field in Avoyelles Parish, Louisiana. Provided deposition testimony.

Alex Simoneaux et al v. Southern Natural Gas Co. et al, 23rd JDC, Assumption Parish, Louisiana, April 2006. Performed a site assessment of soil and groundwater in

northern Napoleonville Field, Assumption Parish, LA. The assessment included surface geophysics, soil and groundwater sampling, conductivity probing, and pump testing of wells to determine aquifer yield. Provided deposition testimony. Successfully defended well yield methodology in a Daubert Hearing and was qualified as an expert in geology, hydrogeology and site assessment.

Lejeune Brothers, LLC v. Goodrich Petroleum Company, LLC., 16th JDC, Iberia Parish, LA, June 2006. Performed a site assessment of soil and groundwater at an oil and gas well tank battery and former pit area. The assessment included surface geophysics, soil and groundwater sampling, and conductivity probing. Provided deposition testimony.

Robert H. Feaster et al. v. Reliant Energy Gas Transmission Co., Inc. et al, 1st JDC, Caddo Parish, LA, June 2006. Performed a site assessment of groundwater contamination by petroleum hydrocarbons caused by a former gas plant. The assessment included sampling existing water supply wells, drilling and sampling of boreholes, performing borehole geophysical logging, installation of monitoring wells, sampling of monitoring wells, development of a conceptual site model and evaluation of plume fate and transport through multiple aquifers. Provided deposition testimony.

Tebow, William M. v Bradex Oil & Gas, Inc., 12th JDC, Avoyelles Parish, LA, August 2006. Performed a site assessment of soil and groundwater contamination by former oil and gas exploration and production facilities in the Haas Oil and Gas field, Avoyelles Parish, LA. The assessment included surface geophysics, direct push conductivity probing, historical aerial photograph interpretation, soil and groundwater sampling, borehole geophysical logging, and review of published data. Provided deposition testimony. Successfully defended qualifications and methodology in a Daubert hearing. Provided jury trial testimony and was qualified by the court as an expert in geology, hydrogeology and site assessment.

Abshire, Evelyn et al v BP Corporation North America et al, 15th JDC, Acadia Parish, LA, August 2006. Performed a site assessment of the Jennings Oilfield, the oldest oil and gas field in Louisiana. The assessment included surface and borehole geophysics, soil and groundwater sampling, installation and sampling of numerous double cased boreholes to depths as great as 220 feet. Provided deposition testimony.

Donald Marin et al v Exxon Mobil Corporation, 16th JDC, St. Mary Parish, LA, August 2006. Performed a site assessment of the Bayou Sale oil and gas field using historical aerial photography interpretation, surface geophysics, direct push conductivity logging, soil and groundwater sampling, and subaqueous sediment sampling. Provided deposition testimony. Provided bench trial testimony and was qualified by the court as an expert in geology, hydrogeology, and site assessment.

Fleming Companies, Inc, v Baker Petrolite Corp, 15th JDC, Lafayette Parish, LA, November 2006. Performed an evaluation of hydrocarbon contamination in the Chicot Aquifer, and performed a predictive groundwater flow model that allowed development

of cost for remediation. Provided deposition testimony and trial testimony. Was accepted as an expert in the fields of Geology, Hydrogeology and Site Assessment.

Brownell Land Co. L.L.C. v Oxy USA Inc, et al, U.S. District Court, Eastern District, Section K, Civil Action No. 05-CV-225, July 2007. Performed a contamination assessment at the Bay Natchez oilfield using surface geophysics, intrusive assessment, historical aerial photograph interpretation, and a review of DNR production files. Issued an expert report that used onsite closure criteria listed in Statewide Order 29B to evaluate soil contamination, and used the LDEQ RECAP protocol to evaluate groundwater contamination. Provided deposition testimony.

J. Gerald Dupont v Metairie Energy Company, Inc, et al. 18th JDC, Division B, Iberville Parish, LA, April 2007. Performed a contamination assessment at Bayou Choctaw oilfield using surface geophysics, intrusive assessment, historical aerial photograph interpretation, and a review of DNR production files. Issued an expert report that used onsite closure criteria listed in Statewide Order 29B to evaluate soil contamination, and used the LDEQ RECAP protocol to evaluate groundwater contamination. Provided deposition testimony.

Roy O. Martin Lumber Company, L.L.C. v Mobil Exploration and Producing North America Inc, et al, 18th JDC, Pointe Coupee Parish, LA., October 2007. Performed a contamination assessment at the Bayou Latenatche-Ravenswood oilfield utilizing Statewide Order 29B to evaluate soil contamination, and performed a RECAP analysis to evaluate groundwater contamination. Provided remediation cost estimates. Provided deposition testimony.

Tensas Poppadoc, Inc v Chevron USA, Inc et al; 7th JDC, Docket No. 40769, Div B, Concordia Parish, Louisiana, March 2008 through January 2009. Performed a contamination assessment and evaluated contaminated Class 1 groundwater using RECAP approach. Soil was evaluated using Statewide Order 29B closure standards. Provided deposition testimony. Provided trial testimony in a jury trial, and was qualified as an expert in geology, hydrogeology, site assessment, implementation of RECAP (Louisiana's risk based regulatory standards), and regulatory compliance. Provided testimony at Louisiana's first Act 312 hearing at the Department of Natural Resources, and was accepted as an expert in areas previously qualified.

Gloria Ned, Individually and on Behalf of Jessie January and Jacqueline January v No. 2003-001100, Division "D" Union Pacific Corp; Union Pacific Railroad Corp; PPG Industries, Inc.; W.J. Peard: A.L. Greathouse; Harry C. Hank; Tommy G Brown and Dallas Stutes, Lake Charles, Calcasieu Parish, LA, January and March 2009. Performed an evaluation of fate and transport of PCE and daughter products in groundwater, and evaluated risk in the framework of the RECAP document. Provided trial testimony in a bench trial on prematurity, and was accepted as an expert in geology, hydrogeology, site assessment, RECAP, and regulatory compliance.

Black River Real Estate Company, Inc v Hunt Oil Company, et al, 7th JDC, Concordia Parish, Div B, Ross Bayou Field, late 2008-early 2009. Performed a

contamination assessment and evaluated contaminated Class 1 groundwater using RECAP approach. Soil was evaluated using Statewide Order 29B closure standards. Assessment utilized surface and borehole geophysics, conventional soil and groundwater sampling, aquifer testing, groundwater flow gradient considering density effects of brine contamination, and predictive groundwater modeling to determine groundwater capture/recovery zones for remediation design. Provided deposition testimony.

Clyde Tucker, Ronald Johnson, Gloria Laubach v Shell Oil, et al, 3rd JDC, Union Parish, Ora Field, early-2010. Testified at a prematurity and improper cumulation hearing, was accepted as an expert in the fields of geology, hydrogeology, site assessment, regulatory compliance and implementation of RECAP.

Sandra Bernard, et al v BP Amoco, et al, 38th JDC, Cameron Parish, LA, Hackberry Field, mid-2010. Performed a contamination assessment and remedial alternatives study. Utilized Statewide Order 29B to evaluate soil contamination, and performed a RECAP analysis to evaluate soil, sediment, and groundwater contamination. Provided remediation cost estimates. Provided depositional testimony. Successfully defended qualifications and methodology in a Daubert hearing.

State of Louisiana (Vermilion Parish School Board) et al v Louisiana Land and Exploration Company, et al, 15th JDC, Vermilion Parish, Louisiana, July 2010. Performed a contamination assessment in an inundated wetlands area, and defined the extent of contamination to subaqueous sediment, soil and groundwater within the Chicot Aquifer and overlying Class 3 groundwater. Prepared a contamination assessment report, and a remedial alternatives analysis with a cost estimate for a remediation alternative. Provided deposition testimony.

Joseph Ray LeJeune, Jr et al v Reed Rubinstein, et al, 18th JDC, Point Coupee Parish, Louisiana, July 2010. Performed a file review and onsite assessment of drums, a UST, soil and groundwater to evaluate the presence of unknown solvent and organic chemicals that had historically been dumped on residential property. Provided report and deposition testimony. Testified in a bench trial and was accepted as an expert in the fields of geology, hydrogeology, site assessment, implementation of Louisiana's RECAP, and remediation.

Mary Belva Benard v Chevron USA, ConocoPhillips Company, Hilcorp Energy Company and Plains Resources, Inc., 15th JDC, Vermilion Parish, LA, August 2010. Performed a contamination assessment and remedial alternatives study for property in the Erath Field, Vermilion Parish, LA. Utilized Statewide Order 29B and the LDEQ RECAP standards to evaluate soil contamination, and performed a RECAP analysis to evaluate soil, sediment, and groundwater contamination. Provided remediation cost estimates. Provided depositional testimony.

Daniel Hardee et al v ARCO et al, 14th JDC, Calcasieu Parish, LA, October 2010. Performed a contamination assessment and remedial alternatives study for property in the Gueydan Field, Vermilion Parish, LA. Utilized Statewide Order 29B and the LDEQ

RECAP standards to evaluate soil contamination, and performed a RECAP analysis to evaluate groundwater contamination. Provided remediation cost estimates. Provided depositional testimony.

Hebert v Energen Resources Corp, et al, 14th JDC, Calcasieu Parish, LA, October 2010. Performed a contamination assessment and remedial alternatives study for property in the Section 32 Field, Calcasieu Parish, LA. Utilized Statewide Order 29B and the LDEQ RECAP standards to evaluate soil contamination, and performed a RECAP analysis to evaluate groundwater contamination. Provided remediation cost estimates. Provided depositional testimony.

Labarre v Texas Brine, et al, February 2011. Provided deposition testimony regarding facts that potentially would be used in a prematurity hearing.

Clyde Tucker et al v. Shell Oil, et al; Docket 42934, Div A; 3rd Judicial District, Union Parish, LA, Ora Field, LA. Provided testimony at a prescription hearing as an expert in geology, hydrogeology, site assessment and regulatory liaison.

Hazel Richard Savoie, et al v Pioneer Exploration, Ltd, et al, Docket 10-18078, 38th JDC, Cameron Parish, LA, 2011. Performed contamination assessment and remedial alternatives study with cost estimates for remediation. Provided depositional testimony and jury trial testimony. Was qualified as an expert in geology, hydrogeology, site assessment, remediation, regulatory compliance, and implementation of LDEQ RECAP. Provided deposition testimony in preparation for preponderance hearing.

Broussard Heirs Intervention of Texaco Exploration and Production Inc. v Hilcorp Energy Company, et al, 15th JDC, Docket 98-71298-D, Vermilion Parish, Louisiana; November 2012. Performed contamination assessment of the Henry Gas Plant and pipeline hub, and of former operations associated with the Erath Oil and Gas Field. Utilized Statewide Order 29B and the LDEQ RECAP protocol to evaluate soil, sediment and groundwater contamination. Performed a RECAP analysis to evaluate groundwater contamination. Prepared a remedial alternatives study and cost model to address soil, sediment and groundwater contamination. Provided depositional testimony.

Ruby Mhire et al v Total Petrochemicals USA, et al; 38th JDC, Docket 10-18239; Cameron Parish, Louisiana, November 2012. Performed contamination assessment of historical exploration and production activities and a former production pit on property within the Grand Chenier Oil Field, Cameron Parish, LA. Utilized Statewide Order 29B and the LDEQ RECAP protocol to evaluate soil, sediment and groundwater contamination. Performed a RECAP analysis to evaluate groundwater contamination. Prepared a remedial alternatives study and cost model to address soil, sediment and groundwater contamination. Provided depositional testimony.

Sterling Sugars, Inc. v BP America Production Company, et al; 16th JDC, Case No. 113095, Div "E", St. Mary Parish, Louisiana, November 2012. Performed contamination assessment of historical exploration and production activities on property

within the Charenton and Franklin Oil Fields, St. Mary Parish, LA Utilized Statewide Order 29B and the LDEQ RECAP protocol to evaluate soil, sediment and groundwater contamination. Performed a RECAP analysis to evaluate groundwater contamination. Prepared a remedial alternatives study and cost model to address soil, sediment and groundwater contamination. Provided depositional testimony.

Joseph Dupont and Doris Petrus v Mobil Oil E&P Southeast, Inc., et al; Docket 52090, Division “Ad Hoc”, 18th JDC, Iberville Parish, LA; February 2013. Performed contamination assessment and remedial alternatives study with cost estimates for remediation. Utilized Statewide Order 29B and the LDEQ RECAP protocol to evaluate soil, sediment and groundwater contamination. Performed a RECAP analysis to evaluate groundwater contamination. Provided deposition testimony.

Gustave J Labarre et al v Texas Brine Company, LLC and Georgia Gulf Chemicals & Vinyls, LLC; 23rd JDC, Div “C”, #30650, Napoleonville Storage Dome, Assumption Parish, LA; October 2013. Performed contamination assessment and remedial alternatives study of a leaking pit used to store solution mined brine. Utilized Statewide Order 29B and the LDEQ RECAP protocol to evaluate soil and groundwater contamination. Provided deposition testimony.

Tillman et al v Chevron USA Inc, et al; Docket #44096; Div “B”; 7th JDC, Concordia Parish, LA; Lake St. John Oilfield, Concordia Parish, LA, February 2014. Performed contamination assessment and remedial alternatives study with cost estimates for remediation. Utilized Statewide Order 29B and the LDEQ RECAP protocol to evaluate soil and groundwater contamination. ModFlow and Winflow groundwater predictive models were used to design a groundwater recovery system. Demonstrative exhibits included a 3-dimensional computer model of groundwater contaminant plumes. Provided deposition testimony.

Lexington Land Development, LLC v Chevron Pipeline Company, et al; Docket No. 561893, Division “22”; 19th JDC, East Baton Rouge Parish, Louisiana, April 2014. Provided depositional testimony concerning historical oil and gas contamination, and a leak of gasoline-diesel mixture from a hole in a transmission pipeline that was installed within one year of the leak. The leak occurred at the center of a brine contamination plume originating at a former production pit, beneath an electrical transmission line corridor.

Clyde Tucker et al v Shell Oil Company, et al; Docket No. 42934, Division “B”; 3rd JDC, Union Parish, Louisiana, Ora Oil Field, November 2014. Performed contamination assessment and authored an assessment report and Plan for Additional Assessment and Remediation in accordance with Statewide Order 29B. Provided deposition testimony.

State of Louisiana (Vermilion Parish School Board) et al v Louisiana Land and Exploration Company, et al, 15th JDC, Vermilion Parish, Louisiana, November 2014. Performed a contamination assessment and a remedial alternatives analysis with a cost

estimate for a remediation alternative. Provided deposition testimony. Provided testimony at jury trial, and was qualified as an expert in geology, hydrogeology, site assessment, remediation, and implementation of regulations.

Joseph Dupont et al v Mobil Oil E&P Southeast, Inc., et al; Docket 52090, Division “Ad Hoc”, 18th JDC, Iberville Parish, LA; February 2015. Performed contamination assessment and remedial alternatives study with cost estimates for remediation. Utilized Statewide Order 29B and the LDEQ RECAP protocol to evaluate soil, sediment and groundwater contamination. Performed a RECAP analysis to evaluate groundwater contamination. Provided deposition testimony.

Claude Coulon Jumonville, et al v Sunset Petroleum, et al; Docket 44491, Division “C”, 18th JDC, Pointe Coupee Parish, LA; Moore Sams Field, Iberville Parish, LA; June 2015. Performed contamination assessment of an oil-based mud drilling pit and remedial alternatives study with cost estimates for remediation. Utilized Statewide Order 29B to evaluate soil and groundwater contamination. Provided deposition testimony.

Frank B Allain et al v Exxon Mobil Corporation, et al; Docket No. 62430; 18th JDC; Iberville Parish, LA; Bayou Des Glaisses Field, Louisiana, April 2015. Performed a contamination assessment and a remedial alternatives analysis with a cost estimate for a remediation alternative. Provided deposition testimony in October 2015.

Sterling Sugars, Inc. v Amerada Hess Corp, et al; 17th JDC, No. 100091, Division “D”; Raceland Oil Field, Lafourche Parish, LA. Performed a contamination assessment and a remedial alternatives analysis with a cost estimate for a remediation alternative. Provided deposition testimony in August 2015. Provided testimony at a limited admission hearing at the Louisiana Department of Natural Resources in November 2015; and was accepted as an expert in geology, hydrogeology, site assessment, remediation, and regulatory compliance.

State of Louisiana (Vermilion Parish School Board) et al v Louisiana Land and Exploration Company, et al, 15th JDC, Vermilion Parish, Louisiana, March 2016. Prepared a Feasible Plan for remediation and additional assessment for the Vermilion Parish School board. Provided testimony at the DNR hearing, and was qualified as an expert in geology, hydrogeology, site assessment, remediation, and implementation of regulations.

State of Louisiana and Iberville Parish School Board v BP America Production Company et al; Docket No. 72605; 18th JDC, Division “A”; Grand River Field, Iberville Parish, LA. Performed a contamination assessment and a remedial alternatives analysis with a cost estimate for a remediation alternative. Provided deposition testimony in May and June 2016.

Barbara Mayeaux et al v Atlantic Richfield, et al; Docket No. 65591, Div “C”; 18th JDC, Iberville Parish, LA. Performed a contamination assessment and a remedial alternatives analysis with a cost estimate for a remediation alternative. Provided deposition testimony in September 2016.

Ritchie Grocer Co. v 2H Inc., et al; Docket No. 1:14-CV-02867, U.S.D.C.; Western District of Louisiana, Alexandria Division; Northern Eola Oil Field, Avoyelles Parish, LA. Performed a contamination assessment and a remedial alternatives analysis with a cost estimate for a remediation alternative. Provided deposition testimony in October 2016.

Elizabeth Miller Lefebvre Family LLC et al v Petrohawk Energy Corporation, et al; Docket 40199, Division “A”, 18th JDC; West Baton Rouge Parish, LA. Performed a contamination assessment and a remedial alternatives analysis with a cost estimate for a remediation alternative. Provided deposition testimony in October 2016.

Darryl Williams, et al v Motiva Enterprises, LLC, et al; CDC No. 2003-6746, Sec 7 (M); Orleans Parish, LA. Performed a contamination assessment and vapor intrusion evaluation for leaking underground storage tank system into adjacent businesses and restaurants. Provided deposition testimony in December 2016. Provided trial testimony in February 2017 and was accepted as an expert in the fields of Geology, Hydrogeology, Site Assessment, Remediation and Regulatory Compliance including RECAP. The court rendered a verdict favorable to the plaintiffs, including a monetary award for the full value of our damage model.

Catherine Alford, et al v Chevron USA Inc. et al; Civil Action No. 2:13-cv-05464; Sec. R Div 3, US Eastern District of LA; Potash Oil Field, Plaquemines Parish, LA. Performed contamination assessment and remedial plan to address oilfield pits and contaminated canal sediment. Provided depositional testimony January 2017.

Mathew Willis v Tennessee Gas Pipeline Company, LLC, et al; Docket No. 82,888; 16th JDC; North Cecilia Field, St. Martin Parish, LA. Performed contamination assessment and remedial plan to address soil and groundwater contamination originating from oilfield pits and production equipment. Provided depositional testimony in August 2017. All parties settled before trial.

Monique Gutierrez Inc., et al v ExxonMobil Corporation, et al; No. 201610135; 15th JDC, Div. “A”; Bosco Field, Acadia Parish, LA. Performed contamination assessment of oilfield pits and production equipment, and completed a remedial alternatives study with cost estimates for remediation. Provided deposition testimony in August 2017. All parties settled before trial.

David V. Currie, et al v B.P. America Production Company, et al; Docket No. 10-18837; 38th JDC; West Hackberry Oil Field, Cameron Parish, LA. Performed contamination assessment of this property in the West Hackberry Field where production began in 1928, and completed a remedial alternatives study with cost estimates for remediation. Provided deposition testimony in March 2018.

BCR Holdings Inc v Baby Oil Inc, et al; Docket #127030, Div “B”; 17th JDC, Lafourche Parish, LA, Bully Camp Oil Field, Lafourche Parish, LA. Performed a contamination assessment of soils, sediment and surface water, and completed a remedial alternatives evaluation with cost estimates for decontamination. Provided deposition testimony in June 2018.

Spanish Lake Restoration, LLC v Shell Oil Company, et al; Docket 69702 18th JDC, Division “C”, Ascension Parish, LA; St. Gabriel Field, Ascension Parish, LA. Performed a contamination assessment of soils and groundwater, and completed a remedial alternatives evaluation with cost estimates for decontamination. Provided deposition testimony and testimony at a prescription hearing in July 2018, and was accepted as an expert in geology, hydrogeology, site assessment and remediation.

State of Louisiana and Two O’Clock Bayou Land Co. et al v Chevron USA, Inc, et al; Docket No. 12C5528, Div “B”; 27th JDC, St. Landry Parish, LA; Krotz Springs Field, St. Landry Parish, LA. Performed contamination assessment of oilfield pits soil and groundwater, and completed a remedial alternatives study with cost estimates for remediation. Provided deposition testimony in August 2018.

New 90 LLC and Louisiana Wetlands LLC v Grigsby Petroleum Inc and Chevron USA Inc; Docket No. 130528, 16th JDC; Franklin Oil Field, St. Mary Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to soil and groundwater, and completed a remedial alternatives study with cost estimates for remediation. Provided deposition testimony in November 2018.

Mary Josephine Buquoi Primeaux et al v Bil-Mik, Enc et al; Docket No. 62857, 18th JDC; Bayou Des Glaisses Oil Field, Iberville Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to soil and groundwater, and completed a remedial alternatives study with cost estimates for remediation. Provided deposition testimony in January 2019.

Dwayne Belaire v Margone, LLC, et al; #20181016; 5th JDC, Div “B”; Near the Bosco Field Crude Oil Gathering System and Tank Farm, Lafayette Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to soil and groundwater at a property adjacent to the facility, and completed a remedial alternatives study with cost estimates for remediation. Provided deposition testimony in June 2019.

Global Marketing Solutions, LLC et al v Blue Mills Farms, Inc. et al; docket No. 35373, Div “A”; 18th JDC, West Baton Rouge Parish, LA. Performed limited environmental assessment of soil and groundwater contamination resulting from historical oil and gas exploration and production activities. Testified at a prescription hearing in April 2019 and was qualified as an expert in geology, hydrogeology, site assessment, and remediation.

Lexington Land Development LLC v Chevron Pipeline Company et al; Docket 561893, Div 22, 19th JDC, East Baton Rouge Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to soil and groundwater, and completed a remedial alternatives study with cost estimates for remediation. Provided testimony at a hearing for prescription and was qualified as an expert in geology, hydrogeology, site assessment, and remediation.

Bowie Lumber Associates v White Oak Operating Company LLC, et al; Docket 129052, Div “B”; 17th JDC; South Bayou Boeuf Field, Lafourche Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to soil and groundwater, and completed a remedial alternatives study with cost estimates for remediation of pit sludges, and soil and groundwater contamination. Provided depositions testimony in August 2019.

Hine/Kyle Properties et al v M-I LLC et al; No. 129750; 16th JDC, Div “D”; Berwick, St. Mary Parish, LA. Performed a contamination assessment of pollution to soil and groundwater from historical operations associated with a shore-based oilfield drilling fluid and chemical staging and mixing facility, and completed a remedial alternatives study with cost estimates for remediation of pit sludges, and soil and groundwater contamination. Provided depositions testimony in September 2019.

Jack Anthony Devillier et al v Chevron USA, Inc, et al; Docket No. 12-C-5530, Div “C”; 27th JDC, St. Landry Parish, LA; Port Barre Oilfield, St. Landry Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to soil and groundwater, and completed a remedial alternatives study with cost estimates for remediation. Provided deposition testimony in May 2020.

Hero Lands Company LLC v Chevron USA Inc, et al; Docket #64320 Div “A”; 25th JDC; Stella Oil Field, Plaquemines Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to soil and groundwater, and completed a remedial alternatives study with cost estimates for remediation. Provided deposition testimony in October 2020. Provided trial testimony in May 2021 and was accepted as an expert in Geology, Hydrogeology, Site Assessment, Remediation, and Regulatory Compliance.

Litel Explorations LLC v Aegis Development Co. LLC, et al; 31st JDC; Docket C-823-17; South Thornwell Gas Field, Jefferson Davis Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to soil and groundwater, including an actively leaking oil well that exhibited excessive pressure at the wellhead. Mapped a buried channel sand deposit in communication with the underlying Chicot Aquifer using information from water well driller’s logs. Completed a remedial alternatives study with cost estimates for remediation. Provided deposition testimony in November 2020.

Emerald Land Corporation v Trimont Energy (BL) LLC et al; Civil Action No. 6:17-CV-01655; Bateman Lake Oil Field, St. Mary Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to a freshwater marsh environment and characterized waste residuals in abandoned oilfield pits. Provided a restoration plan to detoxify the property. Provided deposition testimony in January 2021.

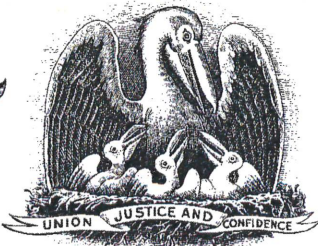
Jointly Administered Chapter 11 Case Numbers 87 B 20142 (ASH) and 87 B 20143 (ASH): State of Louisiana and Vermilion Parish School Board v Chevron Corporation; Docket No. 83536; 15th JDC, Division “6”; Florence Oil Field, Vermilion Parish, LA, and Tomlinson Realty Company LLC et al v Chevron USA Inc, et al; Docket No. 12-C-5529, Div “D”; 27th JDC, Port Barre Oil Field, St. Landry Parish, LA. The Vermilion Parish case involved a geophysical survey using terrain conductivity instrumentation to document environmental impact from former oilfield exploration and production operations. The St. Landry Parish case was a subset of a comprehensive environmental assessment of historical oilfield operations throughout the Port Barre oilfield, and work included delineation of soil and groundwater contamination. A conceptual site model was developed that included identifying a large buried paleo-Mississippi River point bar aquifer in communication with aquifers comprised of overlying and adjacent distributary deposits and underlying massive sands of the Atchafalaya Aquifer. Provided a restoration model with cost estimates. Provided deposition testimony in February 2021.

James J. Martin Family, LLC v BP America Production Company et al; Robert Patricia Fleming, LLC v BP America Production Company et al; Div. “C”; 16th JDC, St. Martin Parish, LA; Anse La Butte Oil Field, St. Martin Parish, LA. Performed a contamination assessment of historical oil exploration and production in an urban area just outside of Lafayette, Louisiana. The site included contamination to soil and to the principal aquifer in the region used for domestic and public potable supply. Performed capture zone modeling of a pump-and-treat remediation program and provided a cost estimate for restoration of soil and groundwater. Provided deposition testimony in March 2021.

Delores H. Lewis, et al v Quintana Petroleum Corp., et al; Docket No. 10-20211; 38th JDC, Cameron Parish, LA; Hog Bayou and Lower Mud Lake Oil Field, Cameron Parish, LA. Performed a contamination assessment of soil and subaqueous sediment at the Hog Bayou Oil Field that is accessible by boat. Provided a restoration plan to clean the property to meet lease obligations. Provided deposition testimony in April 2021.

State of Louisiana and The St. Martin Parish School Board v Shell Oil Company, et al; 16th JDC, Civil Action 85170, Div “C”, West Lake Verret Oil Field, St. Martin Parish, LA. Performed file reviews and a limited contamination assessment of soil, sediment and groundwater around a crater associated with a former blowout. Provided a plan for assessment. Provided depositional testimony in August 2001.

Doyle Boudreaux and Montez Prejean v ConocoPhillips Company et al; 15th JDC, Division “D”; Civil Action No. 20171849; North Ossun Oil Field, Lafayette Parish, LA. Performed a contamination assessment of soil and groundwater including constituents that included heavy metals, petroleum hydrocarbons, salt constituents, and technologically enhanced radioactive materials. Provided an assessment report and a restoration plan that included predictive groundwater modeling. Provided depositional testimony in October 2021.

State of  Louisiana

State Licensing Board for Contractors

This is to Certify that:

ICON ENVIRONMENTAL SERVICES, INC.
2049 Commercial Dr.
Port Allen, LA 70767

is duly licensed and entitled to practice the following classifications

SPECIALTY: HAZARDOUS MATERIALS SITE REMEDIATION



Witness our hand and seal of the Board dated,
Baton Rouge, LA 20th day of August 2019

Director

Chairman

Expiration Date: August 19, 2022

License No: 35504

This License Is Not Transferrable

Treasurer

Louisiana Professional Engineering
and
Land Surveying Board

Hereby Certifies that

ICON Environmental Services, Inc.

*has complied with the regulation of this Board and is authorized
to provide or to offer to provide engineering services in the State of
Louisiana contingent upon payment of the annual renewal fee.*

Baton Rouge, Louisiana · 02/20/2009



License Number 4001

[Signature]
Chairman
[Signature]
Secretary

J. Wayne Prejean, Jr., P.E.
Senior Environmental Engineer
Louisiana Professional Engineer Registration No. 32502

ICON Environmental Services, Inc.
2049 Commercial Drive
Port Allen, Louisiana 70767

PROFESSIONAL QUALIFICATIONS

Professional engineer and project manager with over 20 years of experience. Experienced in site investigation, project planning/management, risk assessment, corrective action, statistical data evaluation, environmental permitting, contaminant fate and transport analysis, and groundwater modeling. Routinely conducts risk evaluation in accordance with the Louisiana Risk Evaluation and Corrective Action Planning (RECAP) program; prepares facility plans in accordance with OPA 90 and SPCC regulations, performs project costing for environmental remediation of legacy oilfield sites, and represent clients as a liaison to regulatory agencies. Manages Resource Conservation and Recovery Act (RCRA) groundwater compliance for Type I, Type II, and Type III solid and hazardous waste processing and disposal facilities. Has provided expert opinion, depositional and hearing testimony, and technical knowledge in support of litigation testimony by other experts.

EDUCATION

- Louisiana State University, Baton Rouge, LA; BS, Environmental Engineering (1999)

REGISTRATION/CERTIFICATION

- 2006 – Registered Professional Engineer in Environmental Engineering (LA Reg. No. 32502)
- 2003 - Registered Engineer Intern in Environmental Engineering (LA Reg. No. 20639)

SUMMARY OF EXPERIENCE

Louisiana Motor Fuels UST Trust Fund Facilities:

- Project Manager for multiple Underground Storage Tank (UST) facilities, including budgeting, scheduling, remediation, compliance monitoring and reporting
- Client/Agency Liaison for Eligibility, Site Investigations, RECAP, Remediation, and NFA Closures
- Conveyance Notice Preparation For NFA Closures

- Site Investigation/Contamination Assessments and RECAP Evaluations
- CAP Design/Implementation, cost estimation, and Bid Submittals
- CAP Activities Including Soil Removal, NAPL/Groundwater Recovery, and UST Closure
- Remediation system design, procurement, startup, and O&M (including preparation of O&M activities and scheduling)
- Compliance Monitoring and Reporting
- Monitor Well/Piezometer Installations
- Discharge Permitting and Reporting under LPDES
- Technical evaluation of remediation system effectiveness, including system efficiency, contaminant reduction, system optimization

Industrial Chemical Facilities – Plastics and Chemical Stock Producers, Refineries, Mineral Extraction Facilities, Agricultural Product Facilities:

- Multi-media Environmental Risk Evaluation for a Major Louisiana Refinery, including fate and transport of environmental contaminants
- RECAP Investigations at Major Facilities
- Site Investigations and Remediation Projects
- Groundwater Certifications

Litigation Support – Groundwater and Soil Contamination from Industrial Sources:

- Risk assessment (RECAP) of multi-media impact from industrial sources in accordance with LDEQ RECAP and LDNR 29B.
- Site remediation technology evaluation and selection
- Design of remediation systems
- Cost estimates for multi-media remediation activities

Litigation Support – Expert and Fact Witness Experience:

- Provided expert opinion, deposition testimony, and trial testimony for litigation associated with environmental risk from industrial chemical spill.
- Provided expert opinion, deposition testimony, and hearing testimony for litigation associated with Underground Storage Tank facility.
- Depositional testimony for litigation associated with soil and groundwater contamination from oilfield activities.

Oil Production and Distribution Facilities:

- Preparation of SPCC Plans for Bulk Oil Distribution facilities, marine transport related facilities, oil drilling, and production facilities.
- Preparation of Facility Response Plans and Operations Manuals for Bulk Oil Distribution facilities, marine transport related facilities, and oil drilling facilities.

Solid Waste Facilities - Major Waste Disposal Companies and Industrial Facilities with Solid Waste Impoundments as well as Parish Owned Disposal Facilities:

- Project management, including budgeting, scheduling, and compliance monitoring, regulatory compliance and reporting.
- Solid Waste Permit Application preparation/Professional Engineer Certification; including Permit Modifications and Renewals.
- Preparation of Groundwater Sampling and Analysis Plans, Methane Monitoring Plans, and Statistical Evaluation Plans.
- Statistical evaluation and database management of groundwater monitoring data for Type I, Type II and Type III and hazardous waste facilities.
- Groundwater and methane monitoring network design and evaluation.
- Louisiana Pollutant Discharge Elimination System (LPDES) permitting and compliance reporting.
- Client/administrative authority liaison for solid waste permitting and compliance issues.

J. Wayne Prejean, Jr., P.E.

DEPOSITIONAL TESTIMONY

- August 2008** *Gloria Ned, Individually and on Behalf of Jessie January and Jacqueline January v No. 2003-00100, Division “D” Union Pacific Corp; Union Pacific Railroad Corp; PPG Industries, Inc.; W.J. Peard; A.L. Greathouse; Harry C. Hank; Tommy G. Brown and Dallas Stutes, Lake Charles, Calcasieu Parish, LA.*
- October 2010** *State of Louisiana and the Vermilion Parish School Board, et al v Louisiana Land and Exploration Company, et al, 15th JDC, Vermilion Parish, Louisiana, Docket No. 82162.*
- February 2011** *Morel G. Lemoine Distributors, Inc. v Shirley G. Soprano D/B/A Gino’s Exxon, 18th JDC, Pointe Coupee Parish, Louisiana, Docket No. 33,520-C Consolidated With Shirley G. Soprano v Morel G. Lemoine Distributors, Inc., 18th JDC, Pointe Coupee Parish, Louisiana, Docket No. 34,173-B.*
- January 2012** *Morel G. Lemoine Distributors, Inc. v Shirley G. Soprano D/B/A Gino’s Exxon, 18th JDC, Pointe Coupee Parish, Louisiana, Docket No. 33,520-C Consolidated With Shirley G. Soprano v Morel G. Lemoine Distributors, Inc., 18th JDC, Pointe Coupee Parish, Louisiana, Docket No. 34,173-B.*
- November 2012** *Sterling Sugars, Inc. v BP America Production Company, et al, 16th JDC, St. Mary Parish, Louisiana, Docket No. 113,095.*
- December 2012** *Texaco Exploration and Production Inc. v Hilcorp Energy Company, 15th JDC, Vermilion Parish, Louisiana, Docket No. 98-71298-C.*
- September 2015** *Sterling Sugars, Inc. v. Amerada Hess Corporation, et al., Docket No. 100091 “D”, 17th JDC, Lafourche Parish, LA.*
- November 2015** *Frank B. Allain, et al. v Exxon Mobil Corporation, et al; Docket No. 62430; 18th JDC, Iberville Parish, LA.*
- June 2016** *State of Louisiana and Iberville Parish School Board v BP America Production Company, et al; Docket No. 72605; 18th JDC, Division “A”; Iberville Parish, LA.*
- November 2016** *Barbara Mayeaux, et al. v Atlantic Richfield Company, et al.; Docket No. 65591; 18th JDC, Division “C”; Iberville Parish, LA.*
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- January 2017** *Catherine Alford, et al. v Chevron USA Inc., et al.; Civil Action No. 2:13-cv-05464; Sec. R Division 3, U.S. Eastern District of Louisiana; Plaquemines Parish, LA.*
- August 2017** *Monique Gutierrez, Inc. et al. v ExxonMobil Corporation, et al.; Docket No. 201610135; 15th JDC, Division “A”; Acadia Parish, LA.*
- March 2018** *David V. Currie, et al. v BP America Production Company, et al.; Docket No. 10-18837; 38th JDC; Cameron Parish, LA.*
- November 2018** *New 90 LLC and Louisiana Wetlands LLC v Grigsby Petroleum, Inc. and Chevron USA, Inc.; Docket No. 130528; 16th JDC; St. Mary Parish, LA.*
- January 2019** *Mary Josephine Buquoi Primeaux, et al v Bil-Mik, Inc., et al; Docket No. 62857; Div. “A”; 18th JDC; Iberville Parish, LA.*
- August 2019** *Kenneth Paul Lyons, et al v Axiall Corporation, et al; Docket No. 2015-1008; Div. “E”; 14th JDC; Calcasieu Parish, LA.*
- September 2019** *Hine/Kyle Properties et al v M-I LLC et al; No. 129750; 16th JDC, Div. “D”; Berwick, St. Mary Parish, LA.*
- November 2021** *Robert Lee Boudreaux and Shirley A. Boudreaux v. Axiall Corporation, et al; Civil Action No. 2:18-cv-0956-DEW-KK; United States District Court; Western District of Louisiana; Lake Charles Division; Calcasieu Parish, LA.*
- January 2022** *Jeanerette Lumber and Shingle Company, LLC v ConocoPhillips Company, et al; No. 134307 Division “E”; 16th JDC; Iberia Parish, LA.*
- May 2022** *Henning Management, LLC v Chevron USA, Inc., et al; Docket No. 73318 Division “C”; 31st JDC; Jefferson Davis Parish, LA.*
- June 2022** *Louisiana Wetlands, LLC and New 90, LLC v Energen Resources Corp., et al; No. 130-527 Division “B”; 16th JDC; St. Mary Parish, LA.*

TRIAL/HEARING TESTIMONY

- Jan/March 2009** *Gloria Ned, Individually and on Behalf of Jessie January and Jacqueline January v No. 2003-00100, Division “D” Union Pacific Corp; Union Pacific Railroad Corp; PPG Industries, Inc.; W.J. Peard; A.L. Greathouse; Harry*
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C. Hank; Tommy G. Brown and Dallas Stutes, Lake Charles, Calcasieu Parish, LA, January and March 2009. Performed calculations for fate and transport evaluation of PCE and daughter compounds in groundwater. Performed evaluation of volatilization of PCE and daughter compounds to air from groundwater recovery and treatment system. Provided testimony in bench trial on prematurity, and was qualified in Louisiana State District Court as an expert in environmental engineering.

March 2011

Morel G. Lemoine Distributors, Inc. v Shirley G. Soprano D/B/A Gino's Exxon, 18th JDC, Pointe Coupee Parish, Louisiana, Docket No. 33,520-C Consolidated With Shirley G. Soprano v Morel G. Lemoine Distributors, Inc., 18th JDC, Pointe Coupee Parish, Louisiana, Docket No. 34,173-B. Performed UST inventory reconciliation calculations, reviewed documents, provided testimony in hearing on prescription, and was qualified as an expert in environmental assessment and remediation.

July 2022

Louisiana Wetlands, LLC et al v Energen Resources Corp. et al; Docket No. 130527, 16th JDC, St. Mary Parish, Louisiana. Prepared remediation plan and cost estimate to address soil and groundwater pollution from oilfield exploration and production activities. Provided testimony at hearing, and was qualified as an expert in environmental engineering, environmental assessment and remediation.

Louisiana Professional Engineering
and
Land Surveying Board

Hereby Certifies that

Mr. John Wayne Prejean Jr.

having qualified before this Board in accordance with laws is licensed as a

Professional Engineer

and is hereby entitled to practice engineering in the State of Louisiana.

Baton Rouge, Louisiana · 06/21/2006



License Number 32502

Robert H. O'Connell
Chairman
Ken M. Hankin
Secretary



Jason S. Sills, E.I.

Professional Qualifications

I have more than nineteen (19) years of experience implementing environmental engineering and remediation projects in Texas, Alabama, Tennessee, Georgia, Mississippi, and Louisiana. My projects have been in a wide variety of disciplines including hydrology, groundwater/soil remediation, surveying, geotechnical, environmental engineering, and construction project management. I have conducted and directed work entailing subsurface investigations, groundwater monitoring, groundwater/soil remediation system installation, corrective action plan development and implementation, site investigations, Risk Evaluation Corrective Action Plans (RECAP), hazardous and non-hazardous waste removal, and transportation/disposal. I am experienced with processing GEM surveys collected in the field, developing contour maps, and interpretation of GEM surveys to determine salt impact at various oil field related sites.

I have been responsible for the investigation and remediation of potentially contaminated sites for a number of companies in the southeastern United States. I have personally conducted a wide range of field and managerial duties including installation of soil borings and monitoring wells, soil and groundwater sampling, integration and analysis of data, interpretation of findings, data reduction, risk evaluation, corrective action design, corrective action implementation, scheduling of subcontractors, supervision of subcontractors and company personnel, and preparation of reports including Phase I assessments, Phase II assessments, Corrective Action Plans, and Louisiana RECAP evaluations.

Education

- Louisiana State University, Baton Rouge, Louisiana
Bachelor of Science in Environmental Engineering, Graduated August 2000
Dates attended: 8/98 – 8/00
- Hinds Community College, Raymond, Mississippi
Pre-Engineering Courses
Dates attended: 8/96 – 5/98
- Graduated Warren Central High School, Vicksburg, Mississippi, 1996

Registration/Certification

- E.I. Registration No. T-20568
- OSHA 40-Hour HAZWOPER Training
- Annual 8-hour HAZWOPER Refreshers (2001-Present)

Experience and Background

2009- Project Manager, ICON Environmental Services, Pres. Port Allen, Louisiana

I am responsible for preparing proposals, cost analysis, and coordination of site assessment activities, remediation projects, routine soil and groundwater monitoring activities, interpretation of findings, data reduction, LDEQ Motor Fuels Trust Fund projects, Risk assessment (RECAP) of multi-media impact from industrial sources in accordance with LDEQ RECAP and LDNR 29B, and I have ten (10) years of experience with AutoCAD. Specific duties include:

- Project Manager for multiple Underground Storage Tank (UST) facilities, including budgeting, scheduling, remediation, compliance monitoring and reporting.
- Client/Agency Liaison for Eligibility, Site Investigations, RECAP, Remediation, and NFA Closures.
- Conveyance Notice Preparation for NFA Closures.
- Preparation of Site Investigation/Contamination Assessments, RECAP Evaluations, Sampling and Analysis Plans, Health and Safety Plans, and Quality Assurance Plans.
- CAP Design/Implementation, cost estimation, and Bid Submittals.
- CAP Activities Including Soil Removal, NAPL/Groundwater Recovery, and UST Closure.
- Remediation system design, procurement, startup, and O&M (including preparation of O&M activities and scheduling).
- Compliance Monitoring and Reporting for UST facilities.
- Monitor Well/Piezometer Installations.
- Discharge Permitting and Reporting under LPDES.
- Technical evaluation of remediation system effectiveness, including system efficiency, contaminant reduction, system optimization.
- Initial site findings audits on production facilities for major oil & gas production/exploration companies.
- Preparation of site findings reports and remediation plans for oil production facilities.
- Depositional testimony for litigation associated with soil and groundwater contamination from oilfield activities.

- Interpretation of GEM surveys conducted at oil field sites and comparing lab analytical to GEM survey response.

**2000- Project Manager, Southern Environmental Management & Specialties (SEMS),
2009 Baton Rouge, Louisiana.**

I was responsible for project activities including preparation of proposals (work plans and cost estimates), conducting site investigations, managing subcontractors and onsite SEMS personnel, and preparing risk evaluations, corrective action plans, and site findings. Specific duties include:

- Project Manager for multiple petroleum retail sites with underground storage tanks (USTs) in Louisiana.
- Development and execution of site investigations to define contamination at various facilities, which includes soil and groundwater sampling, integration and analysis of collected data, interpretation of findings, data reduction, prepare findings report, risk evaluation, corrective action design, and corrective action implementation.
- Assisted in the preparation of stormwater pollution plans for multiple clients in the southeast.
- Preparation of Phase I, Phase II, risk evaluation including Louisiana's RECAP, site characterization, and corrective action plans.
- Preparation of site assessment work proposals that include cost estimates, site work plans, Sampling and Analysis Plans, Health and Safety Plans, and Quality Assurance Plans.
- Project Manager for groundwater and soil corrective action design and track implementation to remediate organic constituents for multiple clients in the southeast.
- Project Coordinator for groundwater sampling, analysis, and reporting at several Resource Conservation and Recovery Act (RCRA) facilities.
- Emergency Response Coordinator for an electrical company in Louisiana. I was one of the onsite managers of response personnel.
- Project Manager for compliance inspections for the LDEQ at over 250 underground storage tank facilities that were affected by hurricanes in Louisiana.

Jason S. Sills, E.I.

LIST OF LITIGATION TESTIMONY

Charles Keith Montgomery v Citgo Petroleum Corp, et al, 27th Judicial District Court, Docket No. 10-4151-A and 10-5128-B, St. Landry Parish Parish, August 2013. Provided expert opinion (written report), and deposition testimony. Case Settled ~2013.

Clyde Tucker et al v Shell Oil Company, et al; Docket No. 42934, Division “B”; 3rd JDC, Union Parish, Louisiana, Ora Oil Field, December 2014. Provided expert opinion (written report), and deposition testimony. Case Settled ~2015.

Frank B Allain et al v Exxon Mobil Corporation, et al; Docket No. 62430; 18th JDC; Iberville Parish, LA; Bayou Des Glaisses Field, Louisiana, April 2015. Provided expert opinion (written report), and deposition testimony. Case Settled ~2016.

Ritchie Grocer Co. v 2H Inc., et al; Docket No. 1:14-CV-02867, U.S.D.C.; Western District of Louisiana, Alexandria Division; Northern Eola Oil Field, Avoyelles Parish, LA, August 2016. Provided expert opinion (written report), and deposition testimony.

Barbara Mayeaux et al v Atlantic Richfield, et al; Docket No. 65591, Div “C”; 18th JDC, Iberville Parish, LA, September 2015. Provided expert opinion (written report), and deposition testimony in November 2016.

Matthew Willis v. Tennessee Gas Pipeline Company, LLC, et al; Docket No. 82,888; 16th JDC; Parish of Saint Martin North Cecilia Field, LA, February 2017. Provided expert opinion (written report), and deposition testimony in August 2017.

State of Louisiana and Two O’Clock Bayou Land Co. et al v Chevron USA, Inc, et al; Docket No. 12C5528, Div “B”; 27th JDC, St. Landry Parish, LA; Krotz Springs Field, March 2017. Provided expert opinion (written report), and deposition testimony in August 2018.

Dwayne Belaire v Margone, LLC, et al; #20181016; 5th JDC, Div “B”; Near the Bosco Field Crude Oil Gathering System and Tank Farm, Lafayette Parish, LA. Provided expert opinion (written report), and deposition testimony in June 2019.

Bowie Lumber Associates v White Oak Operating Company LLC, et al; Docket 129052, Div “B”; 17th JDC; South Bayou Boeuf Field, Lafourche Parish, LA. Provided expert opinion (written report), and deposition testimony in August 2019.

Kenneth Paul Lyons, et al v Axiall Corporation, et al; Docket No. 2015-1008; Div. “E”; 14th JDC; Calcasieu Parish, LA. Performed a contamination assessment of pipeline right-of-way, completed a remedial alternatives study with cost estimates for

remediation of soil and groundwater contamination. Provided depositional testimony in August 2019.

Jack Anthony Devillier et al v Chevron USA, Inc, et al; Docket No. 12-C-5530, Div “C”; 27th JDC, St. Landry Parish, LA; Port Barre Oilfield, St. Landry Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to soil and groundwater, and completed a remedial alternatives study with cost estimates for remediation. Provided deposition testimony in May 2020.

Hero Lands Company LLC v Chevron USA Inc, et al; Docket #64320 Div “A”; 25th JDC; Stella Oil Field, Plaquemines Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to soil and groundwater, and completed a remedial alternatives study with cost estimates for remediation. Provided deposition testimony in October 2020.

Litel Explorations LLC v Aegis Development Co. LLC, et al; 31st JDC; Docket C-823-17; South Thornwell Gas Field, Jefferson Davis Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to soil and groundwater. Completed a remedial alternatives study with cost estimates for remediation. Provided deposition testimony in November 2020.

Emerald Land Corporation v Trimont Energy (BL) LLC et al; Civil Action No. 6:17-CV-01655; Bateman Lake Oil Field, St. Mary Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to a freshwater marsh environment. Provided a restoration plan to remove contamination. Provided deposition testimony in January 2021.

James J. Martin Family, LLC v BP America Production Company et al; Robert Patricia Fleming, LLC v BP America Production Company et al; Div. “C”; 16th JDC, St. Martin Parish, LA; Anse La Butte Oil Field, St. Martin Parish, LA. Performed a contamination assessment of historical oil exploration and production in an urban area just outside of Lafayette, Louisiana. The site included contamination to soil and to the principal aquifer in the region used for domestic and public potable supply. Performed capture zone modeling of a pump-and-treat remediation program and provided a cost estimate for restoration of soil and groundwater. Provided deposition testimony in March 2021.

Delores H. Lewis, et al v Quintana Petroleum Corp., et al; Docket No. 10-20211; 38th JDC, Cameron Parish, LA; Hog Bayou and Lower Mud Lake Oil Field, Cameron Parish, LA. Performed a contamination assessment of soil and subaqueous sediment at the Hog Bayou Oil Field that is accessible by boat. Provided a restoration plan to clean the property to meet lease obligations. Provided deposition testimony in April 2021.

Hero Lands Company LLC v Chevron USA Inc, et al; Docket #64320 Div “A”; 25th JDC; Stella Oil Field, Plaquemines Parish, LA. Performed a contamination assessment of historical oilfield exploration and production pollution to soil and groundwater, and completed a remedial alternatives study with cost estimates for

remediation. Provided testimony at the trial and was qualified as an expert in site assessment and remediation in May 2021.

Doyle Boudreaux and Montez Prejean v ConocoPhillips Company et al; 15th JDC, Division “D”; Civil Action No. 20171849; North Ossun Oil Field, Lafayette Parish, LA. Performed a contamination assessment of soil and groundwater including constituents that included heavy metals, petroleum hydrocarbons, salt constituents, and technologically enhanced radioactive materials. Provided an assessment report and a restoration plan. Provided depositions testimony in October 2021.

Durel Joseph Romaine, et al v Freeport-Mcmoran Oil & Gas, et al; 15th JDC; Division “A”; Civil Action No. 108131; Kaplan Field, Vermillion Parish, Louisiana. Performed a contamination assessment of soil and groundwater including constituents that included heavy metals, petroleum hydrocarbons, salt constituents, and technologically enhanced radioactive materials. Provided an assessment report and a restoration plan. Provided depositions testimony in December 2021.

Lake Charles Harbor & Terminal District v. Reynolds Metal Co., et al., U.S.D.C. W.D. La. No. 2:17-cv-1114 W.D. Louisiana. Performed a sampling assessment and volume calculation of closed landfill. Provided an assessment and restoration plan. Provided depositions testimony in January 2022.