

**Table 1**  
**Slug Test Results**

Jeanerette Lumber Shingle Co., LLC v. ConocoPhillips Company, et al.  
Bayou Pigeon Oil Gas Field  
Iberia Parish, Louisiana

Well ID	b (ft)	hc (ft)	Slug ID	Hvorslev		Estimated Yield	
				K (ft/day)	K (cm/sec)	Q (gpm)	Q (GPD)
<b>30-Foot Zone</b>							
JLS-11	5	24.27	Slug 1	0.114	4.02E-05		
			Slug 2	0.119	4.20E-05		
			<b>Average</b>	0.1165	4.11E-05	<b>0.05</b>	<b>77</b>
MW-1	5	25.75	Slug 1 In	0.6251	2.21E-04		
			Slug 1 Out	0.7867	2.78E-04		
			Slug 2 In	0.6789	2.40E-04		
			Slug 2 Out	0.7536	2.66E-04		
			Slug 3 In	0.6608	2.33E-04		
			Slug 3 Out	0.8083	2.85E-04		
			<b>Average</b>	0.7189	2.54E-04	<b>0.31</b>	<b>441</b>
MW-2	5	25.75	Slug 1 In	0.1862	6.57E-05		
			Slug 1 Out	0.1799	6.35E-05		
			<b>Average</b>	0.18305	6.46E-05	<b>0.09</b>	<b>124</b>
MW-3	5	26.03	Slug 1 In	0.6864	2.42E-04		
			Slug 1 Out	0.9034	3.19E-04		
			Slug 2 In	0.6598	2.33E-04		
			Slug 2 Out	0.8767	3.09E-04		
			Slug 3 In	0.6441	2.27E-04		
			Slug 3 Out	0.8805	3.11E-04		
			<b>Average</b>	0.7752	2.73E-04	<b>0.33</b>	<b>478</b>
<b>Geometric Mean</b>				<b>0.3302</b>	<b>1.16E-04</b>	<b>0.15</b>	<b>211</b>

**Notes:**

Well yield equation for confined aquifer from RECAP Appendix F:

$$Q = \frac{60H_c K b}{9.3 + \log(Kb)}$$

K = hydraulic conductivity (cm/sec)

b = saturated thickness (feet)

h<sub>c</sub> = confining head (feet)

gpm = Gallons per Minute

GPD = Gallons per Day

**Table 2**  
**Survey Data and Groundwater Elevations**

Jeanerette Lumber Shingle Co., LLC v. ConocoPhillips Company, et al.  
Bayou Pigeon Oil Gas Field  
Iberia Parish, Louisiana

	Screened Interval	Screen Length	Top of Casing Elevation	Total Depth	Mid Screen	Mid Screen Elevation	2/9/2021				
							DTW	TDS	Density	Water Elevation	EFWH
Well ID	ft bgs	ft	ft	ft btoc	ft bgs	ft	ft btoc	mg/L	kg/m <sup>3</sup>	ft	ft
MW-1	23-28	5	7.5	28.0	25.5	-18.00	4.73	1,190	999.115	2.77	2.79
MW-2	23-28	5	8.4	28.0	25.5	-17.10	4.41	285	998.424	3.99	3.99
MW-3	23-28	5	7.2	28.0	25.5	-18.30	4.23	831	998.841	2.97	2.98

**Notes:**

ICON Wells JLS-10, JLS-11, JLS-14, and JLS-17 were not surveyed and are not included

Horizontal positions referenced to NAD83 datum

Vertical positions referenced to NAVD88 datum

Depth to water (DTW) measurements are shown as depth below top of casing (btoc).

Density is calculated using Millaro & Poisson (1981).

ft bgs = feet below ground surface

EFWH = Equivalent fresh water head (corrected for density based on TDS), based on Post, et al., 2007.

Table 3  
**Oil Gas Well History**  
 Jeanerette Lumber v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil Gas Field  
 Iberia Parish, Louisiana

Well Serial	Well Name	Well Num	Total Depth (ft)	Spud Date	Status Date	Well Status	Operator History	Notes
70817	Jeanerette	001	10010/8194	6/30/1958	2/21/1978	30 - Plugged and Abandoned	6/9/1958: Pioneer Oil & Gas Company, Inc. 7/15/1958: F.A. Callery, Inc. 1/4/1963: K & H Operating Company 10/01/1969: Kewanee Oil Company	7/19/1958 - Work Permit to perforate - Name listed as Jeanerette LBR & SH No. 1 10/31/1973 - Work Permit to set plug - Name listed as Jeanerette No. 1 2/19/1976 - Work Permit to set plug and perforate

**Table 4**  
**Soil and Sediment Analytical Data**  
 Jeanerette Lumber Shingle Co., LLC v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil Gas Field  
 Iberia Parish, Louisiana

Parameters	Units	Sample ID			Sample 1		Sample 2			JLS-1						JLS-1R					
		Location Name			Other		Other			Area 2						Area 2					
		Location Description			Soil		Soil			Canal Sediment						Canal Sediment					
		Sample Date			11/8/2019		11/8/2019			5/26/2020		5/26/2020				1/13/2021					
Interval (ft)			0-2	2-4	0-2	2-4	4-6	0-2		2-4		4-5		0-2		2-4		4-6			
		RECAP SOIL Ssni	RECAP SOIL SSGW	29-B Submerged Wet.	ICON	ICON	ICON	ICON	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON
<b>Salts</b>																					
% Moisture Primary <sup>1</sup>	%	N/S	N/S	N/S	43.3	45.3	60	62.5	48.5	73.5	72.1	71.4	71.3	70.4	68	75.7	76.4	69.7	71.9	63.1	79.0
% Moisture Secondary <sup>2</sup>	%	N/S	N/S	N/S	NA	NA	NA	NA	NA	73.5	NA	71.1	NA	72.2	NA	NA	NA	NA	NA	NA	NA
% Saturation	%	N/S	N/S	N/S	NA	NA	NA	NA	NA	102	NA	111	NA	124	NA	88.6	NA	94.6	NA	168	NA
Cation Exchange Capacity (CEC)	meq/100g	N/S	N/S	N/S	65.1	66.8	57.3	58.1	23.2	52.6	61.9	50.4	61.9	60.4	63.9	NA	NA	NA	NA	NA	NA
Electrical Conductivity	mmhos/cm	N/S	N/S	N/S	2.76	6.92	17.2	38.1	48.9	46.5	45.9	84.4	62.1	84.5	76.2	NA	NA	NA	NA	NA	NA
Exchangeable Sodium Percentage	%	N/S	N/S	N/S	16.2	31.8	18.3	32.2	35.7	41.7	29.8	10.7	31.3	23.3	26	NA	NA	NA	NA	NA	NA
Sodium Adsorption Ratio	Calc	N/S	N/S	N/S	26.3	50.7	39.2	81.6	93.7	36.6	37.7	65.3	50.2	56.8	56.8	NA	NA	NA	NA	NA	NA
Soluble Calcium	meq/L	N/S	N/S	N/S	2.09	2.62	16.7	23.8	32.6	102	94	146	134	153	160	94.1	NA	145	NA	159	NA
Soluble Magnesium	meq/L	N/S	N/S	N/S	1.17	1.43	7.29	10.9	15.5	62.7	47.6	73.4	66	71.2	81.5	44.1	NA	70.3	NA	84	NA
Soluble Sodium	meq/L	N/S	N/S	N/S	33.5	72.2	136	340	460	332	318	684	502	601	624	225	NA	394	NA	553	NA
SPLP Chloride	mg/L	N/S	5000	N/S	NA	NA	NA	NA	NA	NA	NA	434	NA	539	NA	NA	NA	NA	NA	NA	NA
SPLP Sodium	mg/L	N/S	1500	N/S	NA	NA	NA	NA	NA	NA	NA	257	NA	332	NA	NA	NA	NA	NA	NA	NA
29-B Leachate Chloride	mg/L	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chloride	mg/Kg	N/S	N/S	N/S	NA	NA	NA	NA	NA	4390	NA	7230	NA	10200	NA	3490	NA	5560	NA	10900	NA
Chloride	meq/L	N/S	N/S	N/S	NA	NA	NA	NA	NA	489	NA	777	NA	764	NA	396	NA	676	NA	888	NA
Alkalinity (Sat. Paste)	meq/L	N/S	N/S	N/S	NA	NA	NA	NA	NA	1.9	NA	1.6	NA	1.8	NA	1	NA	1.6	NA	0.5	NA
Sulfate	meq/L	N/S	N/S	N/S	NA	NA	NA	NA	NA	<2.00	NA	<5.00	NA	<5.00	NA	<2.00	NA	<5.00	NA	<5.00	NA
Total Organic Carbon	mg/Kg-dry	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
pH	S.U.	N/S	N/S	6-9	NA	NA	NA	NA	NA	7.25	NA	7.37	NA	7.12	NA	7	NA	7.64	NA	6.75	NA
<b>SPLP Metals</b>																					
SPLP Arsenic	mg/L	N/S	0.2	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SPLP Barium	mg/L	N/S	40	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SPLP Cadmium	mg/L	N/S	0.1	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SPLP Zinc	mg/L	N/S	220	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>Metals (Wet Weight)</b>																					
Arsenic	mg/Kg	12	100	10	5.9	3.49	3.93	4.2	2.29	2.09	2.69	<2.00	3.2	<2.00	2.63	NA	NA	<2.00	2.06	NA	NA
Barium	mg/Kg	550	2000	N/S	130	132	209	178	82	104	166	77.5	364	74.8	210	74.8	159	235	212	93.2	88
True Total Barium	mg/Kg-dry	N/S	N/S	20,000	481	1010	573	544	297	1020	643	1840	1890	855	801	NA	NA	NA	NA	NA	NA
Cadmium	mg/Kg	3.9	20	10	<0.28	<0.268	0.27	0.192	<0.253	<0.200	0.196	<0.200	0.199	<0.200	0.2	NA	NA	NA	NA	NA	NA
Chromium	mg/Kg	12000	100	500	11.6	10.2	9	8	4.3	9.35	6.2	9.34	4.7	8.81	4.6	NA	NA	NA	NA	NA	NA
Lead	mg/Kg	400	100	500	12.2	11.7	11.4	9.5	4	5.52	6.2	5.63	6.3	6.05	5.5	NA	NA	NA	NA	NA	NA
Mercury	mg/Kg	2.3	4	10	<0.06	<0.059	0.077	0.054	0.106	0.0185	<0.0278	0.0216	<0.0283	0.0169	<0.0296	NA	NA	NA	NA	NA	NA
Selenium	mg/Kg	39	20	10	<2.24	<2.14	<1.48	<1.45	<2.02	<1.00	<1.09	<1.00	<1.09	<1.00	<1.25	NA	NA	NA	NA	NA	NA
Silver	mg/Kg	39	100	200	NA	NA	NA	NA	NA	<0.500	NA	<0.500	NA	<0.500	NA	NA	NA	NA	NA	NA	NA
Strontium	mg/Kg	N/S	N/S	N/S	45.2	47.3	98	90	53	NA	27.1	NA	38	NA	40	NA	NA	NA	NA	NA	NA
Zinc	mg/Kg	2300	2800	500	43.2	38.6	46	43	21.4	28.1	30	26.3	27.8	22.3	24.1	NA	NA	NA	NA	NA	NA
<b>Hydrocarbons</b>																					
Oil & Grease	dry wt %	65	N/S	1	NA	0.12	1.07	1.92	6.67	<0.188	NA	0.251	NA	<0.180	NA	NA	NA	NA	NA	NA	NA
TPH-DRO (>C10-C28)	mg/Kg	180	65	N/S	375	411	875	3940	35500	NA	245	NA	176	NA	85.2	NA	NA	NA	NA	NA	NA
TPH-ORO (>C28-C35)	mg/Kg	N/S	10000	N/S	230	189	540	1800	8860	NA	211	NA	197	NA	129	NA	NA	NA	NA	NA	NA
Aliphatic C6-C8	mg/Kg	1,200	10000	N/S	NA	NA	NA	NA	NA	<15.0	NA	<15.0	NA	<15.0	NA	NA	NA	NA	NA	NA	NA
Aliphatic >C8-C10	mg/Kg	120	5300	N/S	NA	NA	NA	NA	NA	<15.0	NA	<15.0	NA	<15.0	NA	NA	NA	NA	NA	NA	NA
Aliphatic >C10-C12	mg/Kg	230	10000	N/S	NA	NA	NA	NA	NA	<15.0	NA	<15.0	NA	<15.0	NA	NA	NA	NA	NA	NA	NA
Aliphatic >C12-C16	mg/Kg	370	10000	N/S	NA	NA	NA	NA	NA	<10.0	NA	22.4	NA	<10.0	NA	NA	NA	NA	NA	NA	NA
Aliphatic >C16-C35	mg/Kg	7,100	10000	N/S	NA	NA	NA	NA	NA	<10.0	NA	74.2	NA	<10.0	NA	NA	NA	NA	NA	NA	NA
Aromatic >C8-C10	mg/Kg	65	65	N/S	NA	NA	NA	NA	NA	<10.0	NA	<10.0	NA	<10.0	NA	NA	NA	NA	NA	NA	NA
Aromatic >C10-C12	mg/Kg	120	100	N/S	NA	NA	NA	NA	NA	<10.0	NA	<10.0	NA	<10.0	NA	NA	NA	NA	NA	NA	NA
Aromatic >C12-C16	mg/Kg	180	200	N/S	NA	NA	NA	NA	NA	<15.0	NA	<15.0	NA	<15.0	NA	NA	NA	NA	NA	NA	NA
Aromatic >C16-C21	mg/Kg	150	2100	N/S	NA	NA	NA	NA	NA	<15.0	NA	<15.0	NA	<15.0	NA	NA	NA	NA	NA	NA	NA
Aromatic >C21-C35	mg/Kg	180	10000	N/S	NA	NA	NA	NA	NA	<15.0	NA	24.2	NA	<15.0	NA	NA	NA	NA	NA	NA	NA
Total TPH (C6-C35)	mg/Kg	N/S	N/S	N/S	NA	NA	NA	NA	NA	<15.0	NA	121	NA	<15.0	NA	NA	NA	NA	NA	NA	NA
<b>PAHs</b>																					
2-Methylnaphthalene	mg/Kg	22	1.7	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Acenaphthene	mg/Kg	370	220	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Acenaphthylene	mg/Kg	350	88	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Anthracene	mg/Kg	2,200	120	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(a)anthracene	mg/Kg	0.62	330	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(a)pyrene	mg/Kg	0.33	23	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(b)fluoranthene	mg/Kg	0.62	220	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Benzo(k)fluoranthene	mg/Kg	6.2	120	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Chrysene	mg/Kg	62	76	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Dibenz(a,h)anthracene	mg/Kg	0.33	540	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluoranthene	mg/Kg	220	1200	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Fluorene	mg/Kg	280	230	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Indeno(1,2,3-cd)pyrene	mg/Kg	0.62	9.2	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Naphthalene	mg/Kg	6.2	1.5	N/S	NA	NA	NA	NA	NA												

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**Soil and Sediment Analytical Data**  
 Jeanerette Lumber Shingle Co., LLC v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil Gas Field  
 Iberia Parish, Louisiana

Sample ID					JLS-2										JLS-3						JLS-4																				
Location Name					Area 2										Area 2						Area 1																				
Location Description					Canal Sediment										Canal Sediment						Canal Sediment																				
Sample Date					5/26/2020					2/4/2021					2/8/2021					2/25/2021					5/26/2020					5/26/2020											
Interval (ft)					0-2			2-4			4-6			44			0-2		2-4		4-6		6-8		0-5		5-11			0-2			0-2			2-4			4-6		
Parameters	Units	RECAP SOIL Ssn	RECAP SOIL SSGW	29-B Submerged Wet	ERM	HET	ICON	ERM	HET	ICON	ERM	HET	ICON	ERM	ERM	ICON	ERM	ERM	ERM	ICON	ERM	ICON	ERM	ICON	ERM	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON						
<b>Salts</b>																																									
% Moisture Primary <sup>1</sup>	%	N/S	N/S	N/S	NA	75.5	73.7	NA	69.2	68.4	NA	69.4	67.2	NA	72.5	70.4	72.8	54.8	58.0	58.9	74.2	73.6	73.1	64.8	NA	55.9	53.9	72.6	72.2	67	66.1	56.7	61.1	NA	NA						
% Moisture Secondary <sup>2</sup>	%	N/S	N/S	N/S	NA	74.5	NA	NA	69.4	NA	NA	68.8	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	52.8	NA	72.9	NA	60.6	NA	58.6	NA	NA						
% Saturation	%	N/S	N/S	N/S	NA	108	NA	NA	110	NA	NA	114	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	114	NA	92.5	NA	95.4	NA	94	NA	NA						
Cation Exchange Capacity (CEC)	meq/100g	N/S	N/S	N/S	74.6	58.3	69.7	70.2	57	69.3	68.9	49.6	71.2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	76.9	60.4	78.3	45.2	68.9	42.4	62.2	35.7	55.5	NA	NA					
Electrical Conductivity	mmhos/cm	N/S	N/S	N/S	15.2	12.4	14	32.8	36.5	35.4	44.6	49.2	46.1	2.27	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.81	0.726	1.78	2.03	2.26	2.06	3.42	1.56	2.28	NA	NA					
Exchangeable Sodium Percentage	%	N/S	N/S	N/S	10.4	9.84	30.4	26.2	2.11	23.5	30.7	12.6	35.6	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.81	0.748	1.23	3.04	2.9	3.46	3.41	1.72	5.04	NA	NA					
Sodium Adsorption Ratio	Calc	N/S	N/S	N/S	16.8	21.2	16.8	39.8	46.2	44.1	50.8	47.6	56	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.67	1.93	2.18	6.42	3.9	6.69	5.53	7.8	4.84	NA	NA					
Soluble Calcium	meq/L	N/S	N/S	N/S	31.3	24.8	29	50	43.7	56.4	63.7	58.1	76.8	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.59	1.94	6.13	4.59	5.32	4.53	7.64	3.53	4.66	NA	NA					
Soluble Magnesium	meq/L	N/S	N/S	N/S	13.6	13.8	12.3	21.1	24.7	23.3	27.3	31.6	32.4	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.63	1.2	3.25	1.83	2.62	1.91	3.8	1.53	2.56	NA	NA					
Soluble Sodium	meq/L	N/S	N/S	N/S	79.5	93.2	76.2	237	270	278	342	319	414	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	2.42	2.42	4.72	11.5	7.77	12	13.2	12.4	9.2	NA	NA					
SPLP Chloride	mg/L	N/S	5000	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA				
SPLP Sodium	mg/L	N/S	1500	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
29-B Leachate Chloride	mg/L	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
Chloride	mg/Kg	N/S	N/S	N/S	NA	1030	NA	NA	3450	NA	NA	5420	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	19	NA	112	NA	149	NA	141	NA	NA	NA	NA	NA				
Chloride	meq/L	N/S	N/S	N/S	NA	115	NA	NA	309	NA	NA	421	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	4.39	NA	14.5	NA	15.1	NA	11.1	NA	NA	NA	NA	NA				
Alkalinity (Sat. Paste)	meq/L	N/S	N/S	N/S	NA	2.9	NA	NA	3	NA	NA	2.2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.9	NA	2	NA	2	NA	1.4	NA	NA	NA	NA					
Sulfate	meq/L	N/S	N/S	N/S	NA	<1.00	NA	NA	<2.00	NA	NA	<2.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.15	NA	1.42	NA	1.34	NA	1.49	NA	NA	NA	NA	NA	NA			
Total Organic Carbon	mg/Kg-dry	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	71600	NA	66000	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
pH	S.U.	N/S	N/S	6-9	NA	7.21	NA	NA	7.39	NA	NA	7.12	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	6.68	NA	6.91	NA	6.86	NA	6.71	NA	NA	NA	NA	NA	NA			
<b>SPLP Metals</b>																																									
SPLP Arsenic	mg/L	N/S	0.2	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0011	NA	<0.001	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
SPLP Barium	mg/L	N/S	40	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.067	NA	0.04	0.058	0.099	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
SPLP Cadmium	mg/L	N/S	0.1	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.001	NA	<0.001	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
SPLP Zinc	mg/L	N/S	220	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.02	NA	<0.02	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
<b>Metals (Wet Weight)</b>																																									
Arsenic	mg/Kg	12	100	10	4.02	2.67	3.9	7.74	4.19	6.1	5.41	4.31	6.4	NA	NA	NA	NA	10.5	4.4	NA	4.3	5.48	4	2.83	2.04	2	2.17	2.9	2.61	4	3.47	4.6	NA	NA	NA	NA					
Barium	mg/Kg	550	2000	N/S	268	141	244	734	263	537	825	89.3	525	NA	NA	953	NA	2040	797	NA	325	749	461	106	113	123	93.3	107	134	198	163	209	NA	NA	NA	NA					
True Total Barium	mg/Kg-dry	N/S	N/S	20,000	1080	1140	1220	2570	2870	2800	3410	3030	2730	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	376	<500	354	524	444	721	671	600	588	NA	NA	NA	NA				
Cadmium	mg/Kg	3.9	20	10	<0.262	<0.200	0.24	<0.251	<0.200	0.294	<0.272	<0.200	0.29	NA	NA	0.174	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.260	<0.200	0.227	<0.200	0.205	0.216	0.26	<0.200	0.291	NA	NA	NA				
Chromium	mg/Kg	12000	100	500	6.08	8.51	5.3	6.66	10.1	6.1	6.32	10.1	6	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	8.74	13.9	8.9	9.51	5.9	11.6	6.9	13.3	6	NA	NA					
Lead	mg/Kg	400	100	500	7.1	5.94	7	10.8	9.73	10.7	10.2	8.08	9.8	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	8.92	8.22	9.1	5.6	6	7.05	7.7	7.04	7.1	NA	NA					
Mercury	mg/Kg	2.3	4	10	<0.0930	0.023	<0.0261	<0.0965	0.029	0.0303	<0.0999	0.0302	0.0312	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.0979	0.0377	<0.0455	0.0216	<0.0266	0.0266	<0.0324	0.0322	<0.038	NA	NA					
Selenium	mg/Kg	39	20	10	<2.09	<1.00	<0.96	<2.01	<1.00	<1.2	<2.18	<1.00	<1.3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<2.08	<1.00	<1.74	<1.00	<1.1	<1.00	<1.3	<1.00	<1.53	NA	NA					
Silver	mg/Kg	39	100	200	<0.262	<0.500	NA	<0.251	<0.500	NA	<0.272	<0.500	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.260	<0.500	NA	<0.500	NA	<0.500	NA	<0.500	NA	<0.500	NA	NA				
Strontium	mg/Kg	N/S	N/S	N/S	NA	NA	<21.3	NA	NA	47	NA	NA	49	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	22.8	NA	14.5	NA	18.8	NA	20	NA	NA					
Zinc	mg/Kg	2300	2800	500	40.4	25	25.5	30.8	29.8	28.9	27.6	25.4	26.6	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	30.6	35.4	31.9	28.7	27.4	31.9	31.7	31	27.5	NA	NA					
<b>Hydrocarbons</b>																																									
Oil & Grease	dry wt %	65	N/S	1	0.26	<0.196	NA	0.43	<0.163	NA	0.93	0.32	0.64	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.05	<0.106	NA	<0.184	NA	<0.127	NA	<0.121	NA	NA	NA					
TPH-DRO (>C10-C28)	mg/Kg	180	65	N/S	NA	NA	98.7	NA	NA	493	NA	NA	931	NA	NA	NA	NA	1900	NA	83.7	NA	760	NA	NA	NA	80.9	NA	78.2	NA	104	NA	118	NA	NA	NA	NA					
TPH-ORO (>C28-C35)	mg/Kg	N/S	10000	N/S																																					

**Table 4**  
**Soil and Sediment Analytical Data**  
 Jeanerette Lumber Shingle Co., LLC v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil Gas Field  
 Iberia Parish, Louisiana

Sample ID					JLS-5				JLS-6				JLS-6R				JLS-7		JLS-8		JLS-9				JLS-9R											
Location Name					Area 1				Area 1				Area 1				Area 1		Area 1		Area 1				Area 1											
Location Description					Canal Sediment				Canal Sediment				Canal Sediment				Canal Sediment		Canal Sediment		Canal Sediment				Canal Sediment											
Sample Date					5/27/2020				5/27/2020				1/13/2021				5/27/2020		5/27/2020		5/27/2020				1/13/2021											
Interval (ft)					0-2				2-4				4-6				0-2		0-2		0-2				2-4				4-6							
Parameters	Units	RECAP SOIL Ssn	RECAP SOIL SSGW	29-B Submerged Wet.	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON						
<b>Salts</b>																																				
% Moisture Primary <sup>1</sup>	%	N/S	N/S	N/S	61.9	63.2	63.8	64.4	63	61.3	60.2	57.5	70.7	69.1	59.6	58.6	57.9	56.2	66.5, 68	67.5	59, 64.8	60.7	67.1, 67.8	65.6	65, 63.2	61.8	68.7	66.3	61.2	62.2	60	58.9				
% Moisture Secondary <sup>2</sup>	%	N/S	N/S	N/S	62.7	NA	64.8	NA	63	NA	57.8	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA					
% Saturation	%	N/S	N/S	N/S	125	NA	86	NA	88.6	NA	89.9	NA	89	NA	91.2	NA	93.6	NA	86.7	NA	119	NA	87.3	NA	84.3	NA	88.1	NA	89.3	NA	87.3	NA				
Cation Exchange Capacity (CEC)	meq/100g	N/S	N/S	N/S	44.3	72.9	43.5	58.6	50.9	65.8	50	60	NA	NA	NA	NA	NA	NA	53	60.7	59.6	78.9	51.7	56.3	50	58	NA	NA	NA	NA	NA	NA				
Electrical Conductivity	mmhos/cm	N/S	N/S	N/S	0.646	1.46	1.18	1.73	1.26	1.74	1.22	4.74	NA	NA	NA	NA	NA	NA	1.58	3.27	0.663	1.05	1.01	2.58	0.965	0.85	NA	NA	NA	NA	NA	NA				
Exchangeable Sodium Percentage	%	N/S	N/S	N/S	1.28	1.24	0.778	0.92	0.84	1.05	0.783	3.66	NA	NA	NA	NA	NA	NA	2.31	2.36	0.773	1.02	0.253	1.47	<0.100	0.8	NA	NA	NA	NA	NA	NA				
Sodium Adsorption Ratio	Calc	N/S	N/S	N/S	2.2	2.95	1.95	1.89	2.26	1.84	2.36	5.37	NA	NA	NA	NA	NA	NA	4.75	4.81	2.35	1.7	2.44	2.8	3.78	1.07	NA	NA	NA	NA	NA	NA				
Soluble Calcium	meq/L	N/S	N/S	N/S	1.72	3.78	4.17	6.23	3.74	5.76	4.14	13	4.39	NA	3.82	NA	2.74	NA	5.07	9.5	1.83	3.49	2.67	7.58	2.26	2.25	3.49	NA	3.74	NA	2.86	NA				
Soluble Magnesium	meq/L	N/S	N/S	N/S	0.932	1.89	1.64	2.72	1.79	2.62	1.65	6.99	2.14	NA	2.05	NA	1.68	NA	1.68	4.12	1.09	1.97	1.5	3.49	1.24	1.15	1.63	NA	1.96	NA	1.59	NA				
Soluble Sodium	meq/L	N/S	N/S	N/S	2.53	4.96	3.33	4	3.75	3.77	4.01	17	2.59	NA	3.33	NA	2.91	NA	8.73	12.6	2.84	2.8	3.53	6.58	5	1.4	1.43	NA	1.85	NA	1.93	NA				
SPLP Chloride	mg/L	N/S	5000	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA			
SPLP Sodium	mg/L	N/S	1500	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
29-B Leachate Chloride	mg/L	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Chloride	meq/kg	N/S	N/S	N/S	29.6	NA	36.4	NA	45.2	NA	42.6	NA	28.2	NA	40	NA	40.7	NA	64.1	NA	35.8	NA	21.4	NA	27.7	NA	15.9	NA	25.7	NA	47.1	NA	NA			
Chloride	meq/L	N/S	N/S	N/S	4.1	NA	8.93	NA	4.49	NA	3.96	NA	3.12	NA	4.62	NA	3.52	NA	7.48	NA	3.08	NA	2.48	NA	3.44	NA	2	NA	2.55	NA	4.6	NA	NA			
Alkalinity (Sat. Paste)	meq/L	N/S	N/S	N/S	0.9	NA	2.4	NA	6.1	NA	6.2	NA	6.4	NA	5.6	NA	4.5	NA	6.6	NA	5.8	NA	4.6	NA	2.8	NA	3.6	NA	6.5	NA	3.8	NA	NA			
Sulfate	meq/L	N/S	N/S	N/S	0.749	NA	5.76	NA	1.84	NA	1.37	NA	1.8	NA	1.86	NA	1.3	NA	1.64	NA	1.51	NA	2.16	NA	1.89	NA	2.66	NA	1.59	NA	1.73	NA	NA			
Total Organic Carbon	mg/Kg-dry	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
pH	S.U.	N/S	N/S	6-9	6.66	NA	7.18	NA	7.13	NA	7.21	NA	7.65	NA	7.79	NA	7.68	NA	7.37	NA	6.55	NA	7.18	NA	7.02	NA	7.25	NA	7.54	NA	7.62	NA	NA	NA		
<b>SPLP Metals</b>																																				
SPLP Arsenic	mg/L	N/S	0.2	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
SPLP Barium	mg/L	N/S	40	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
SPLP Cadmium	mg/L	N/S	0.1	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
SPLP Zinc	mg/L	N/S	220	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>Metals (Wet Weight)</b>																																				
Arsenic	mg/Kg	12	100	10	<2.00	1.9	3.04	3.05	3.23	4	3.03	5.3	NA	NA	NA	NA	NA	3.5	3.32	2.66	4	2.72	2.84	3.33	4.2	3.31	4	2.53	NA	3.03	NA	3.57	3.6			
Barium	mg/Kg	550	2000	N/S	77.6	87	203	298	161	495	186	358	214	189	508	349	547	377	155	239	89.1	80	136	338	226	413	251	377	347	465	369	518	NA			
True Total Barium	mg/Kg-dry	N/S	N/S	20,000	<500	293	976	996	2060	1460	1080	1020	NA	NA	NA	NA	NA	NA	855	862	<500	307	1170	1210	1490	1340	NA	NA	NA	NA	NA	NA	NA	NA		
Cadmium	mg/Kg	3.9	20	10	<0.200	0.215	0.205	0.268	0.244	0.33	0.254	0.326	NA	NA	NA	NA	NA	NA	<0.200	0.259	0.219	0.266	0.203	0.236	<0.200	0.251	NA	NA	NA	NA	NA	NA	NA	NA		
Chromium	mg/Kg	12000	100	500	11.4	6.8	12	6.2	11	7.3	11.4	7.4	NA	NA	NA	NA	NA	NA	11.2	5.7	11.6	7.7	11.3	6	9.39	6.2	NA	NA	NA	NA	NA	NA	NA	NA		
Lead	mg/Kg	400	100	500	6.78	6.8	7.26	8.2	8.39	8.7	8.16	9.1	NA	NA	NA	NA	NA	NA	6.3	6.8	8.15	8.3	6.25	6.7	6.49	7.8	NA	NA	NA	NA	NA	NA	NA	NA		
Mercury	mg/Kg	2.3	4	10	0.0255	<0.0348	0.0327	0.041	0.0376	0.038	0.0314	<0.0425	NA	NA	NA	NA	NA	NA	0.0308	<0.0309	0.0312	<0.03928	0.0343	<0.0331	0.0375	0.04	NA	NA	NA	NA	NA	NA	NA	NA		
Selenium	mg/Kg	39	20	10	<1.00	<1.46	<1.00	<1.32	<1.00	<1.5	<1.00	<1.59	NA	NA	NA	NA	NA	NA	<1.00	<1.23	<1.00	<1.54	<1.00	<1.35	<1.00	<1.43	NA	NA	NA	NA	NA	NA	NA	NA		
Silver	mg/Kg	39	100	200	<0.500	NA	<0.500	NA	<0.500	NA	<0.500	NA	NA	NA	NA	NA	NA	NA	<0.500	NA	<0.500	NA	<0.500	NA	<0.500	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Strontium	mg/Kg	N/S	N/S	N/S	NA	17	NA	22.6	NA	29.8	NA	44	NA	NA	NA	NA	NA	NA	NA	30.8	NA	20.1	NA	18.7	NA	19.5	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Zinc	mg/Kg	2300	2800	500	31.3	28	32.5	33.1	38.1	36.9	35.3	36.6	NA	NA	NA	NA	NA	NA	32.7	38	35.6	32	29.1	27.7	28.6	30.5	NA	NA	NA	NA	NA	NA	NA	NA		
<b>Hydrocarbons</b>																																				
Oil & Grease	dry wt %	65	N/S	1	<0.134	NA	0.626	NA	<0.135	NA	<0.118	NA	NA	NA	NA	NA	NA	NA	<0.156	NA	<0.142	NA	<0.155	NA	<0.136	NA	NA	NA	NA	NA	NA	NA	NA	NA		
TPH-DRO (>C10-C28)	mg/Kg	180	65	N/S	NA	<50	NA	545	NA	234	NA	126	NA	NA	NA	NA	NA	NA	NA	239	NA	<50	NA	157	NA	59.6	NA	NA	NA	NA	NA	NA	NA	NA		
TPH-ORO (>C28-C35)	mg/Kg	N/S	10000	N/S	NA	65	NA	438	NA	297	NA	157	NA	NA	NA	NA	NA	NA	NA	240	NA	62	NA	138	NA	89.1	NA	NA	NA	NA	NA	NA	NA	NA		
Aliphatic C6-C8	mg/Kg	1,200	10000	N/S	<40.2	NA	<15.0	NA	<15.0	NA	<15.0	NA	NA	NA	NA	NA	NA	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Aliphatic >C8-C10	mg/Kg	120	5300	N/S	<40.2	NA	<15.0	NA	<15.0	NA	<15.0	NA	NA	NA	NA	NA	NA	NA	<15.0	NA	<15.0	NA	<15.0													







**Table 4**  
**Soil and Sediment Analytical Data**  
 Jeanerette Lumber Shingle Co., LLC v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil Gas Field  
 Iberia Parish, Louisiana

Parameters	Units	Sample ID					JLS-16					JLS-17					JLS-18					JLS-19									
		Location Name					Area 2					Area 2					Area 1					Area 1									
		Location Description					Soil					Soil					Soil					Soil									
		Sample Date					8/6/2020					8/7/2020					8/10/2020					8/10/2020									
Interval (ft)					0-4	4-6	6-8	24-28	36-40	0-4	4-8	12-16	24-26	40-42	46-48	0-2	2-4	4-6	0-2	2-4	4-6										
RECAP SOIL Ssni	RECAP SOIL SSGW	29-B Submerged Wet.	ICON	ICON	ICON	ICON	ICON	ICON	ICON	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON			
<b>Salts</b>																															
% Moisture Primary <sup>1</sup>	%	N/S	N/S	N/S	50.9	46.7	64.5	40.8	44.7	53	44.9	58.1	51.8	50	34.4	28.1	23.4	23.5	35.3	32.6	46.5	45.5	50	42.3	32.1	29	26.3	24.4	32.8	30.6	
% Moisture Secondary <sup>2</sup>	%	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	36.9	NA	33.2	NA	46.6	NA	32.4	NA	28.8	NA	42.4	NA	
% Saturation	%	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	124	NA	126	NA	42.7	NA	97	NA	94.7	NA	103	NA	101	NA	79	NA	77.4	NA		
Cation Exchange Capacity (CEC)	meq/100g	N/S	N/S	N/S	71.3	55.9	84.2	1.06	0.87	66	56.8	NA	NA	NA	NA	NA	NA	41.7	43.9	50.9	55.3	NA	53.4	53	47.9	31.3	30.4	NA	32.5		
Electrical Conductivity	mmhos/cm	N/S	N/S	N/S	0.48	0.38	0.81	NA	NA	0.99	4.98	1.36	1.3	0.74	0.58	0.38	0.663	0.76	0.741	0.64	0.554	0.9	0.852	1.37	0.333	0.5	0.562	0.7	0.992	1.01	
Exchangeable Sodium Percentage	%	N/S	N/S	N/S	0.92	1.22	0.93	NA	NA	0.61	1.1	NA	NA	NA	NA	NA	NA	0.4	0.66	0.894	1.05	NA	1.12	0.674	0.5	1.83	2.1	NA	2.22		
Sodium Adsorption Ratio	Calc	N/S	N/S	N/S	1.35	1.71	1.62	NA	NA	1.32	2.21	NA	NA	NA	NA	NA	NA	1.75	1.22	4.69	1.92	NA	2	1.71	1.44	4.44	2.45	NA	2.66		
Soluble Calcium	meq/L	N/S	N/S	N/S	1.47	0.91	2.72	NA	NA	4.14	37.2	NA	3.54	NA	0.797	NA	0.731	NA	3.29	2.3	1.45	2.79	2.33	4.71	1.24	1.63	1.47	1.78	2.77	2.46	
Soluble Magnesium	meq/L	N/S	N/S	N/S	0.8	0.5	1.42	NA	NA	2.16	10.7	NA	1.54	NA	<0.820	NA	<0.820	NA	1.56	1.2	<0.820	2.59	1.2	2.63	<0.820	0.9	<0.820	1.03	1.25	1.38	
Soluble Sodium	meq/L	N/S	N/S	N/S	1.43	1.44	2.33	NA	NA	2.35	10.8	NA	7.56	NA	4.76	17.1	6.2	NA	2.73	1.62	3.99	2.84	4.59	3.84	1.35	1.62	3.81	2.9	5.45	3.68	
SPLP Chloride	mg/L	N/S	5000	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
SPLP Sodium	mg/L	N/S	1500	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
29-B Leachate Chloride	mg/L	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Chloride	mg/Kg	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	111	NA	45.4	NA	41.9	NA	15.4	NA	29.2	NA	51.8	NA	53.8	NA	37	NA	97.3	NA
Chloride	meq/L	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	7.3	NA	1.91	NA	3.95	NA	1.09	NA	2.65	NA	3.95	NA	0.559	NA	2.41	NA	5.98	NA
Alkalinity (Sat. Paste)	meq/L	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	3.3	NA	3.3	NA	2.1	NA	2	NA	1.3	NA	1.2	NA	0.5	NA	1	NA	1	NA
Sulfate	meq/L	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	1.41	NA	0.386	NA	0.297	NA	4.47	NA	0.752	NA	1.78	NA	1.69	NA	1.46	NA	1.9	NA
Total Organic Carbon	mg/Kg-dry	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
pH	S.U.	N/S	N/S	6-9	NA	NA	NA	NA	NA	NA	NA	NA	NA	7.93	NA	7.66	NA	7.49	NA	6.76	NA	6.04	NA	6.46	NA	6.36	NA	6.5	NA	6.54	NA
<b>SPLP Metals</b>																															
SPLP Arsenic	mg/L	N/S	0.2	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SPLP Barium	mg/L	N/S	40	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SPLP Cadmium	mg/L	N/S	0.1	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SPLP Zinc	mg/L	N/S	220	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
<b>Metals (Wet Weight)</b>																															
Arsenic	mg/Kg	12	100	10	1.94	2.38	3.16	NA	NA	3.26	4.24	NA	NA	NA	NA	NA	NA	4.96	5.55	3.24	3.17	3.46	5.03	4.7	4.22	6.74	8.4	4.96	5.57	NA	
Barium	mg/Kg	550	2000	N/S	99	120	78	NA	NA	104	131	NA	NA	NA	NA	NA	NA	145	106	117	122	119	129	127	126	138	160	109	138	NA	
True Total Barium	mg/Kg-dry	N/S	N/S	20,000	299	311	319	NA	NA	440	381	NA	NA	NA	NA	NA	NA	<500	207	<500	288	<500	281	<500	251	<500	288	<500	275	NA	
Cadmium	mg/Kg	3.9	20	10	<0.242	<0.253	0.206	NA	NA	0.264	0.318	NA	NA	NA	NA	NA	NA	0.618	0.335	<0.200	<0.264	0.261	0.351	0.256	<0.342	<0.200	<0.354	0.241	0.394	NA	
Chromium	mg/Kg	12000	100	500	8.7	8.5	5.1	NA	NA	9.1	10	NA	NA	NA	NA	NA	NA	11.2	6.42	10.6	7.6	10.8	8.4	14.4	9.8	12.1	7.7	9.79	6.9	NA	
Lead	mg/Kg	400	100	500	8.1	9.2	5.5	NA	NA	9.3	11.3	NA	NA	NA	NA	NA	NA	10.5	8.4	9.05	8.6	10.2	9.6	12.3	10.3	9.85	9.2	8.78	8.3	NA	
Mercury	mg/Kg	2.3	4	10	0.058	<0.055	<0.037	NA	NA	<0.047	<0.01	NA	NA	NA	NA	NA	NA	0.0429	<0.063	0.0351	<0.056	0.0345	<0.06	0.0527	<0.072	0.0405	<0.0718	0.0371	<0.075	NA	
Selenium	mg/Kg	39	20	10	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<1.00	<2.68	<1.00	<2.11	<1.00	<2.2	<1.00	<2.74	<1.00	<2.83	<1.00	<2.76	NA	
Silver	mg/Kg	39	100	200	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.500	NA	<0.500	NA	<0.500	NA	<0.500	NA	<0.500	NA	<0.500	NA	<0.500	NA
Strontium	mg/Kg	N/S	N/S	N/S	22.4	23.9	19.2	NA	NA	20.9	26	NA	NA	NA	NA	NA	NA	NA	21	NA	22.6	NA	25	NA	26.6	NA	26.6	NA	24.8	NA	
Zinc	mg/Kg	2300	2800	500	35.8	33.5	20.1	NA	NA	36	37.2	NA	NA	NA	NA	NA	NA	52.8	33.6	27.7	28.1	39.1	37	47.4	40.4	43.9	38.1	40.6	36.7	NA	
<b>Hydrocarbons</b>																															
Oil & Grease	dry wt %	65	N/S	1	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<0.079	NA	<0.075	NA	<0.094	NA	<0.074	NA	<0.070	NA	<0.087	NA	NA	
TPH-DR0 (>C10-C28)	mg/Kg	180	65	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<50	NA	<50	NA	<50	NA	<50	NA	<50	NA	<50	NA	
TPH-OR0 (>C28-C35)	mg/Kg	N/S	10000	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	84.5	NA	110	NA	119	NA	325	NA	97.6	NA	102	NA	
Aliphatic C6-C8	mg/Kg	1,200	10000	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA
Aliphatic >C8-C10	mg/Kg	120	5300	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA
Aliphatic >C10-C12	mg/Kg	230	10000	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA
Aliphatic >C12-C16	mg/Kg	370	10000	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA
Aliphatic >C16-C35	mg/Kg	7,100	10000	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	23.8	NA	27	NA	17.4	NA	21.8	NA	31.7	NA	23.6	NA	NA	
Aromatic >C8-C10	mg/Kg	65	65	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<15.9	NA	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA
Aromatic >C10-C12	mg/Kg	120	100	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<15.9	NA	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA	<10.0	NA
Aromatic >C12-C16	mg/Kg	180	200	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<23.8	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA
Aromatic >C16-C21	mg/Kg	150	2100	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<23.8	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA
Aromatic >C21-C35	mg/Kg	180	10000	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	<23.8	NA	<15.0	NA	16.6	NA	16.1	NA	15.6	NA	<15.0	NA	<15.0	NA
Total TPH (C6-C35)	mg/Kg	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	37.7	NA	27	NA	34	NA	37.9	NA	47.3	NA	23.6	NA	NA	
<b>PAHs</b>																															

**Table 4**  
**Soil and Sediment Analytical Data**  
 Jeanerette Lumber Shingle Co., LLC v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil Gas Field  
 Iberia Parish, Louisiana

Sample ID		JLS-20										JLS-21				JLS-22				JLS-23						SB-1									
Location Name		Area 1										Area 2				Area 2				Area 2						Area 2									
Location Description		Canal Sediment										Canal Sediment				Canal Sediment				Canal Sediment						Canal Sediment									
Sample Date		8/10/2020										9/8/2020				9/8/2020				9/8/2020		9/8/2020		2/2/2021		1/13/2021									
Interval (ft)		0-2		2-4		4-6		6-7		0-2		2-4		0-2		2-4		0-2		2-4		0-2		2-3.5		0-2		2-4		4-6					
Parameters	Units	RECAP SOIL Ssn	RECAP SOIL SSGW	29-B Submerged Wet.	HET	ICON	HET	ICON	HET	ICON	HET	ICON	HET	ICON	ERM	ICON	ERM	ICON	ERM	ICON	ERM	ICON	ERM	ICON	ERM	ICON	HET	ICON	HET	ICON	HET	ICON			
<b>Salts</b>																																			
% Moisture Primary <sup>1</sup>	%	N/S	N/S	N/S	67.8	66.7	65.2	64.6	63.9	64	54	44.8	56.4	53.4	50.3	49.5	38.7	44.2	38	39.7	66.7	63.6	69.3	70.9	54.8	55.4	62.9	61.0	80.2	79.4	69.5	73.8	70.1	68.2	
% Moisture Secondary <sup>2</sup>	%	N/S	N/S	N/S	68	NA	65	NA	64.4	NA	50.2	NA	58	NA	59.3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
% Saturation	%	N/S	N/S	N/S	89.5	NA	95.7	NA	102	NA	92.9	NA	163	NA	207	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Cation Exchange Capacity (CEC)	meq/100g	N/S	N/S	N/S	50	55.9	53.5	53	NA	58.9	NA	33.3	62.2	NA	58.3	56.4	46	58.7	49.5	NA	75.4	73.4	76.9	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Electrical Conductivity	mmhos/cm	N/S	N/S	N/S	1.29	1.88	1.44	2.32	1.4	2.06	1.35	1.2	3.21	NA	4.35	4.34	6.12	1.25	1.29	2.27	3.3	1.45	1.42	3.73	<0.10	NA	NA	NA	NA	NA	NA	NA	NA		
Exchangeable Sodium Percentage	%	N/S	N/S	N/S	0.812	1.11	1.24	1.46	NA	1.73	NA	3.25	14.7	NA	13.2	16.2	8.7	3.81	9.97	NA	2.53	1.84	9.65	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Sodium Adsorption Ratio	Calc	N/S	N/S	N/S	2.56	1.58	3.69	2.41	NA	2.97	NA	2.91	19.9	18.3	37.5	25	6.6	5.52	9.25	13.6	4.1	3.99	13.8	15.6	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Soluble Calcium	meq/L	N/S	N/S	N/S	5.46	7.6	5.35	8.34	4.34	6.03	4.04	2.97	2.6	3.01	2.37	3.59	1.3	1.83	2.32	2.94	2.77	2.96	3.24	4.02	NA	NA	NA	NA	NA	NA	NA	NA	NA		
Soluble Magnesium	meq/L	N/S	N/S	N/S	2.02	3.22	1.97	3.64	1.55	2.94	1.67	1.53	0.826	1.48	0.832	1.48	0.78	0.96	1.24	1.49	1.42	1.42	1.63	1.96	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Soluble Sodium	meq/L	N/S	N/S	N/S	4.96	3.68	7.06	5.9	7.26	6.29	8.28	4.37	26.1	27.4	47.5	41.3	6.73	6.52	12.3	20.2	5.94	5.91	21.5	26.9	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
SPLP Chloride	mg/L	N/S	5000	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
SPLP Sodium	mg/L	N/S	1500	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
29-B Leachate Chloride	mg/L	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Chloride	mg/Kg	N/S	N/S	N/S	51.5	NA	77.3	NA	94.4	NA	95.3	NA	578	NA	906	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Chloride	meq/L	N/S	N/S	N/S	5.23	NA	7.78	NA	7.83	NA	7.64	NA	27.2	NA	38.2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Alkalinity (Sat. Paste)	meq/L	N/S	N/S	N/S	5.8	NA	4	NA	3.8	NA	2.4	NA	1.2	NA	1.6	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Sulfate	meq/L	N/S	N/S	N/S	1.06	NA	1.01	NA	0.889	NA	2.36	NA	1.12	NA	0.643	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Total Organic Carbon	mg/Kg-dry	N/S	N/S	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	25500	NA	82600	NA	NA	NA	NA	NA	NA	NA	
pH	S.U.	N/S	N/S	6-9	7.18	NA	7.39	NA	7.32	NA	7.35	NA	7.75	NA	7.85	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
<b>SPLP Metals</b>																																			
SPLP Arsenic	mg/L	N/S	0.2	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.0012	NA	0.0012	NA	NA	NA	NA	NA	
SPLP Barium	mg/L	N/S	40	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.063	NA	0.067	NA	NA	NA	NA	NA	
SPLP Cadmium	mg/L	N/S	0.1	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
SPLP Zinc	mg/L	N/S	220	N/S	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
<b>Metals (Wet Weight)</b>																																			
Arsenic	mg/Kg	12	100	10	2.74	2.63	3.06	3	3.06	3.03	3.82	4.44	2.09	2.2	3.37	2.71	3.05	3.21	3.15	6.2	2.29	1.87	3.85	4.6	NA	2.89	NA	1.56	NA	NA	<2.00	1.33	NA	NA	
Barium	mg/Kg	550	2000	N/S	257	254	198	247	216	256	239	204	110	136	134	141	162	157	139	160	178	115	302	260	NA	186	NA	178	56.5	66	200	143	103	213	
True Total Barium	mg/Kg-dry	N/S	N/S	20,000	1170	1220	803	1010	874	1010	670	462	<500	<935	<500	<988	<198	<930	<198	<951	<198	<976	1180	1400	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Cadmium	mg/Kg	3.9	20	10	<0.200	0.181	0.211	<0.174	0.203	0.23	<0.200	<0.272	<0.200	<0.56	<0.200	<0.63	<1.24	<0.68	<1.22	<0.71	<1.22	<0.44	<1.22	<0.36	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Chromium	mg/Kg	12000	100	500	7.44	5.6	8.88	6.9	9.11	7.1	7.53	6.2	11.6	8	14.4	8.7	14	10.4	12.4	11.8	5.74	7.6	5.73	4.9	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Lead	mg/Kg	400	100	500	6.97	7.6	7.85	7.9	8.43	7.8	8.37	8.1	7.59	9.5	8.51	10	11.8	12.2	11.1	13.4	6.9	9.8	8.8	7.4	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Mercury	mg/Kg	2.3	4	10	0.0287	<0.034	0.0264	<0.038	0.0251	<0.037	0.0246	<0.059	0.0249	<0.049	0.0192	<0.0469	<0.107	<0.058	<0.104	<0.0557	<0.106	<0.04	<0.0944	<0.032	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Selenium	mg/Kg	39	20	10	<1.00	<1.23	<1.00	<1.39	<1.00	<1.36	<1.00	<2.17	<1.00	<4.49	<1.00	<5.03	<9.90	<5.39	<9.76	<5.64	<9.78	<3.48	<9.77	<2.88	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Silver	mg/Kg	39	100	200	<0.500	NA	<0.500	NA	<0.500	NA	<0.500	NA	<0.500	NA	<0.500	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Strontium	mg/Kg	N/S	N/S	N/S	NA	22.4	NA	23	NA	24	NA	27.9	NA	56	NA	52	37.2	37.6	32.9	43	28.1	32.3	41.7	39	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Zinc	mg/Kg	2300	2800	500	28.8	27.9	32.5	31.4	32	31.9	30.7	31.2	42.8	37.6	50	37.7	53.6	41.5	51	48.1	28.5	48	23.6	20	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
<b>Hydrocarbons</b>																																			
Oil & Grease	dry wt %	65	N/S	1	<0.156	NA	<0.143	NA	<0.140	NA	<0.100	NA	<0.119	NA	<0.122	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
TPH-DRO (>C10-C28)	mg/Kg	180	65	N/S	NA	238	NA	193	NA	173	NA	99	NA	<50	NA	<50	NA	<50	NA	<10	NA	71.7	NA	110	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
TPH-ORO (>C28-C35)	mg/Kg	N/S	10000	N/S	NA	294	NA	260	NA	230	NA	198	NA	<50	NA	<50	NA	<10	NA	96.8	NA	106	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Aliphatic C6-C8	mg/Kg	1,200	10,000	N/S	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	<15.0	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Aliphatic >C8-C10	mg/Kg	120	5300	N/S	<15																														



**Table 5**  
**Soil Geotechnical Data**  
*Jeanerette Lumber v. ConocoPhillips Company, et al.*  
*Bayou Pigeon Oil Gas Field*  
*Iberia Parish, Louisiana*

Location ID			JLS-2	
Depth Interval			42-44'	43-44'
Sample Date			2/22/2021	2/22/2021
Sampler			ERM	ERM
Parameters	Unit	Analytical Method		
<i>Grain Size</i>				
Clay	%	ASTM D422	NA	49.2
Silt	%	ASTM D423	NA	49.7
Sand	%	ASTM D424	NA	1.2
Gravel	%	ASTM D425	NA	0
Moisture Content of Soil	%	ASTM D2216	35.4	35.2
Dry Density	lbs/ft <sup>3</sup>	-	40.3	NA
Permeability	cm/sec	ASTM D5084	8.3 x 10 <sup>-8</sup>	NA
Classification	-	ASTM D4318	Gray clay	Gray Fat Clay (CH)

Notes:

lbs/ft<sup>3</sup> - pounds per cubic foot

cm/sec - centimeters per second

NA - Not analyzed

Table 6  
**Groundwater Analytical Data**  
 Jeanerette Lumber v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil Gas Field  
 Iberia Parish, Louisiana

		Well Identifier		JLS-10		JLS-11		JLS-14	
		Screened Depth Interval (feet BGS):		26-36'		27-37'		43-48'	
		Sample Date:		7/30/2020		7/30/2020		8/5/2020	
Parameters	Units	MO-1 DW3 (No DAF)	EPA SMCL	ERM	ICON	ERM	ICON	HET	ICON
<b>Total Metals</b>									
Arsenic	mg/L	0.05	NS	0.079	NA	0.095	0.108	0.34	NA
Barium	mg/L	2	NS	0.46	NA	70.8	77.2	0.39	NA
Cadmium	mg/L	0.01	NS	<0.0010	NA	<0.025	<0.0500	<0.0010	NA
Calcium	mg/L	NS	NS	109	NA	4260	4230	67.8	NA
Chromium	mg/L	0.05	NS	<0.0010	NA	<0.10	<0.100	0.0024	NA
Iron	mg/L	NS	0.3	15.1	NA	353	424	9.15	NA
Lead	mg/L	0.05	NS	<0.0010	NA	<0.025	<0.100	0.004	NA
Magnesium	mg/L	NS	NS	36.7	NA	1270	1320	22.4	NA
Manganese	mg/L	NS	0.05	0.45	NA	15.6	17.4	0.25	NA
Mercury	mg/L	0.002	NS	<0.00020	NA	<0.00020	<0.00020	<0.00020	NA
Potassium	mg/L	NS	NS	5.25	NA	39.1	57	5.58	NA
Selenium	mg/L	0.05	NS	NA	NA	NA	NA	<0.0010	NA
Silver	mg/L	0.13	NS	NA	NA	NA	NA	<0.0010	NA
Sodium	mg/L	NS	NS	304	NA	16700	18300	205	NA
Strontium	mg/L	NS	NS	0.69	NA	53.8	60.7	0.48	NA
Zinc	mg/L	5	NS	0.27	NA	<1.10	0.139	0.021	NA
<b>Dissolved Metals</b>									
Arsenic	mg/L	0.05	NS	0.075	0.0212	0.1	NA	0.36	0.35
Barium	mg/L	2	NS	0.4	0.233	66.1	NA	0.37	0.395
Cadmium	mg/L	0.01	NS	<0.0010	<0.005	<0.025	NA	<0.0010	0.013
Calcium	mg/L	NS	NS	NA	95	NA	NA	69.8	69.8
Chromium	mg/L	0.05	NS	<0.0010	<0.0100	<0.10	NA	<0.0010	<0.0100
Iron	mg/L	NS	0.3	NA	0.892	NA	NA	7.28	7.59
Lead	mg/L	0.05	NS	<0.0010	<0.0100	<0.025	NA	<0.0010	<0.0100
Magnesium	mg/L	NS	NS	NA	34.3	NA	NA	21.4	22.8
Manganese	mg/L	NS	0.05	NA	0.449	NA	NA	0.25	0.257
Mercury	mg/L	0.002	NS	<0.00020	<0.00020	<0.00020	NA	<0.00020	<0.000200
Potassium	mg/L	NS	NS	NA	5.89	NA	NA	5.74	7.59
Selenium	mg/L	0.05	NS	NA	NA	NA	NA	<0.0010	NA
Silver	mg/L	0.13	NS	NA	NA	NA	NA	<0.0010	NA
Sodium	mg/L	NS	NS	NA	261	NA	NA	207	200
Strontium	mg/L	NS	NS	0.63	0.643	48.3	NA	0.49	0.518
Zinc	mg/L	5	NS	0.23	0.162	<1.10	NA	<0.020	<0.0100
<b>Anions</b>									
Bromide	mg/L	NS	NS	NA	NA	NA	NA	0.319	NA
Chloride	mg/L	NS	250	280	287	42700	41800	188	171
Sulfate	mg/L	NS	250	1.68	1.19	<100	<50.0	<0.200	<0.250
<b>Alkalinity</b>									
Bicarbonate Alkalinity	mg/L	NS	NS	654	612	283	218	527	508
Carbonate Alkalinity	mg/L	NS	NS	<1.0	<10.0	<1.0	<10.0	<1.0	<10.0
Total Alkalinity	mg/L	NS	NS	NA	612	NA	218	NA	508
Total Dissolved Solids (TDS)	mg/L	NS	500	1130	1080	74100	71100	903	870
Specific Conductivity	umhos/cm	NS	NS	NA	NA	NA	NA	1331	NA
<b>BTEX Compounds</b>									
Benzene	mg/L	0.0011	NS	<0.00500	<0.00500	<0.00500	<0.00500	<0.00500	<0.00500
Ethylbenzene	mg/L	2.4	NS	<0.00500	<0.00500	<0.00500	<0.00500	<0.00500	<0.00500
Toluene	mg/L	6.1	NS	0.01	0.00966	<0.00500	<0.00500	<0.00500	<0.0100
Xylene (total)	mg/L	10	NS	<0.015	<0.015	<0.01	<0.0150	<0.015	<0.0500
<b>Hydrocarbon Fractions</b>									
TPH-D	mg/L	1.0	NS	NA	0.355	NA	<0.127	NA	0.303
TPH-O	mg/L	1.0	NS	NA	0.215	NA	<0.117	NA	0.197
TPH-G	mg/L	1.3	NS	NA	<0.150	NA	0.311	NA	<0.150
Aliphatic C6-C8	mg/L	170	NS	0.032	NA	<0.030	NA	<0.030	NA
Aliphatic >C8-C10	mg/L	3.4	NS	<0.020	NA	<0.020	NA	<0.020	NA
Aliphatic >C10-C12	mg/L	3.4	NS	<0.100	NA	<0.100	NA	<0.100	NA
Aliphatic >C12-C16	mg/L	3.4	NS	<0.100	NA	<0.100	NA	<0.100	NA
Aliphatic >C16-C35	mg/L	67	NS	<0.150	NA	<0.150	NA	<0.150	NA
Aromatic >C8-C10	mg/L	1.3	NS	<0.030	NA	<0.030	NA	<0.030	NA
Unadjusted >C10-C12 Aromatics	mg/L	1.3	NS	<0.100	NA	<0.100	NA	<0.100	NA
Unadjusted >C12-C16 Aromatics	mg/L	1.3	NS	<0.100	NA	<0.100	NA	<0.100	NA
Unadjusted >C16-C21 Aromatics	mg/L	1.0	NS	<0.100	NA	<0.100	NA	<0.100	NA
Aromatic >C21-C35	mg/L	1.0	NS	<0.100	NA	<0.100	NA	<0.100	NA
<b>Radium</b>									
Radium 226	pCi/L	NS	NS	NA	NA	4.31	55.2	0.173	0.452
Radium 228	pCi/L	NS	NS	NA	NA	32.7	49	1.07	1.07
Radium 226+228	pCi/L	NS	NS	NA	NA	37.01	104.2	1.243	1.522
Total Dissolved Solids (TDS)	mg/L	NS	500	NA	NA	68200	NA	723	NA

**Notes:**

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 < - Not detected at or above the reporting limit shown  
 NA - Not analyzed; NS - No Standard, NYR - Not Yet Received

Table 6  
**Groundwater Analytical Data**  
 Jeanerette Lumber v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil Gas Field  
 Iberia Parish, Louisiana

		Well Identifier		JLS-17		MW-1		MW-2	
		Screened Depth Interval (feet BGS):		43-48'		23-28'		23-28'	
		Sample Date:		8/7/2020		2/9/2021		2/9/2021	
Parameters	Units	MO-1 DW3 (No DAF)	EPA SMCL	HET	ICON	ERM	ICON	ERM	ICON
<b>Total Metals</b>									
Arsenic	mg/L	0.05	NS	0.44	NA	0.11	0.0937	0.10	NA
Barium	mg/L	2	NS	0.58	NA	1.68	1.45	0.71	NA
Cadmium	mg/L	0.01	NS	<0.0010	NA	NA	<0.00500	NA	NA
Calcium	mg/L	NS	NS	103	NA	360	321	148	NA
Chromium	mg/L	0.05	NS	0.003	NA	NA	<0.0100	NA	NA
Iron	mg/L	NS	0.3	13.7	NA	35.8	30.5	15.5	NA
Lead	mg/L	0.05	NS	0.0053	NA	NA	<0.0100	NA	NA
Magnesium	mg/L	NS	NS	35.3	NA	137	119	53.1	NA
Manganese	mg/L	NS	0.05	0.55	NA	1.51	1.38	0.64	NA
Mercury	mg/L	0.002	NS	<0.00020	NA	NA	<0.000200	NA	NA
Potassium	mg/L	NS	NS	7.96	NA	8.68	9.98	5.52	NA
Selenium	mg/L	0.05	NS	<0.0010	NA	NA	<0.0200	NA	NA
Silver	mg/L	0.13	NS	<0.0010	NA	NA	NA	NA	NA
Sodium	mg/L	NS	NS	215	NA	366	351	260	NA
Strontium	mg/L	NS	NS	0.72	NA	2.47	2.19	0.98	NA
Zinc	mg/L	5	NS	<0.020	NA	NA	<0.0100	NA	NA
<b>Dissolved Metals</b>									
Arsenic	mg/L	0.05	NS	0.39	0.449	0.091	NA	0.087	0.0902
Barium	mg/L	2	NS	0.45	0.495	1.52	NA	0.56	0.584
Cadmium	mg/L	0.01	NS	<0.0010	0.0131	NA	NA	NA	<0.00500
Calcium	mg/L	NS	NS	93.9	93.1	NA	NA	NA	128
Chromium	mg/L	0.05	NS	<0.0010	<0.0100	NA	NA	NA	<0.0100
Iron	mg/L	NS	0.3	9.28	10.1	31.4	NA	11.3	11.5
Lead	mg/L	0.05	NS	<0.0010	<0.0100	NA	NA	NA	<0.0100
Magnesium	mg/L	NS	NS	28.4	31.2	NA	NA	NA	44.9
Manganese	mg/L	NS	0.05	0.41	0.447	1.46	NA	0.50	0.50
Mercury	mg/L	0.002	NS	<0.00020	<0.000200	NA	NA	NA	<0.000200
Potassium	mg/L	NS	NS	7.26	9.08	NA	NA	NA	5.63
Selenium	mg/L	0.05	NS	<0.0010	NA	NA	NA	NA	<0.0200
Silver	mg/L	0.13	NS	<0.0010	NA	NA	NA	NA	NA
Sodium	mg/L	NS	NS	186	193	NA	NA	NA	229
Strontium	mg/L	NS	NS	0.65	0.705	2.29	NA	0.83	0.853
Zinc	mg/L	5	NS	<0.020	<0.0100	NA	NA	NA	<0.0100
<b>Anions</b>									
Bromide	mg/L	NS	NS	0.35	NA	<2.00	2.39	1.00	1.07
Chloride	mg/L	NS	250	210	192	1190	1010	285	240
Sulfate	mg/L	NS	250	<0.200	<0.250	<2.00	5.80	0.412	2.72
<b>Alkalinity</b>									
Bicarbonate Alkalinity	mg/L	NS	NS	549	528	545	525	676	625
Carbonate Alkalinity	mg/L	NS	NS	<1.0	<10.0	<1.0	<10.0	<1.0	<10.0
Total Alkalinity	mg/L	NS	NS	NA	528	NA	525	NA	625
Total Dissolved Solids (TDS)	mg/L	NS	500	784	930	3020	2820	1110	1380
Specific Conductivity	umhos/cm	NS	NS	1359	NA	NA	NA	NA	NA
<b>BTEX Compounds</b>									
Benzene	mg/L	0.0011	NS	<0.00500	<0.00500	<0.005	<0.00500	<0.005	<0.00500
Ethylbenzene	mg/L	2.4	NS	<0.00500	<0.00500	<0.005	<0.00500	<0.005	<0.00500
Toluene	mg/L	6.1	NS	<0.00500	<0.0100	<0.005	<0.0100	<0.005	<0.0100
Xylene (total)	mg/L	10	NS	<0.015	<0.0500	<0.015	<0.0500	<0.015	<0.0500
<b>Hydrocarbon Fractions</b>									
TPH-D	mg/L	1.0	NS	NA	0.143	NA	0.326	NA	<0.134
TPH-O	mg/L	1.0	NS	NA	<0.123	NA	<0.125	NA	<0.123
TPH-G	mg/L	1.3	NS	NA	<0.150	NA	<0.150	NA	<0.150
Aliphatic C6-C8	mg/L	170	NS	<0.030	NA	<0.030	NA	<0.030	NA
Aliphatic >C8-C10	mg/L	3.4	NS	<0.020	NA	<0.020	NA	<0.020	NA
Aliphatic >C10-C12	mg/L	3.4	NS	<0.100	NA	<0.100	NA	<0.100	NA
Aliphatic >C12-C16	mg/L	3.4	NS	<0.100	NA	<0.100	NA	<0.100	NA
Aliphatic >C16-C35	mg/L	67	NS	<0.150	NA	<0.150	NA	<0.150	NA
Aromatic >C8-C10	mg/L	1.3	NS	<0.030	NA	<0.030	NA	<0.030	NA
Unadjusted >C10-C12 Aromatics	mg/L	1.3	NS	<0.100	NA	<0.100	NA	<0.100	NA
Unadjusted >C12-C16 Aromatics	mg/L	1.3	NS	<0.100	NA	<0.100	NA	<0.100	NA
Unadjusted >C16-C21 Aromatics	mg/L	1.0	NS	<0.100	NA	<0.100	NA	<0.100	NA
Aromatic >C21-C35	mg/L	1.0	NS	<0.100	NA	<0.100	NA	<0.100	NA
<b>Radium</b>									
Radium 226	pCi/L	NS	NS	NA	0.431	0.681	0.673	0.534	0.279
Radium 228	pCi/L	NS	NS	NA	0.694	1.09	1.28	0.941	0.821
Radium 226+228	pCi/L	NS	NS	NA	1.125	1.771	1.953	1.475	1.100
Total Dissolved Solids (TDS)	mg/L	NS	500	NA	NA	NA	NA	NA	NA

**Notes:**

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Table 6  
**Groundwater Analytical Data**  
 Jeanerette Lumber v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil Gas Field  
 Iberia Parish, Louisiana

		Well Identifier		MW-3	
		Screened Depth Interval (feet BGS):		23-28'	
		Sample Date:		2/9/2021	
Parameters	Units	MO-1 DW3 (No DAF)	EPA SMCL	ERM	ICON
<b>Total Metals</b>					
Arsenic	mg/L	0.05	NS	0.095	NA
Barium	mg/L	2	NS	1.38	NA
Cadmium	mg/L	0.01	NS	NA	NA
Calcium	mg/L	NS	NS	317	NA
Chromium	mg/L	0.05	NS	NA	NA
Iron	mg/L	NS	0.3	25.3	NA
Lead	mg/L	0.05	NS	NA	NA
Magnesium	mg/L	NS	NS	126	NA
Manganese	mg/L	NS	0.05	1.04	NA
Mercury	mg/L	0.002	NS	NA	NA
Potassium	mg/L	NS	NS	6.7	NA
Selenium	mg/L	0.05	NS	NA	NA
Silver	mg/L	0.13	NS	NA	NA
Sodium	mg/L	NS	NS	235	NA
Strontium	mg/L	NS	NS	2.12	NA
Zinc	mg/L	5	NS	NA	NA
<b>Dissolved Metals</b>					
Arsenic	mg/L	0.05	NS	0.079	0.0834
Barium	mg/L	2	NS	1.20	1.20
Cadmium	mg/L	0.01	NS	NA	<0.00500
Calcium	mg/L	NS	NS	NA	291
Chromium	mg/L	0.05	NS	NA	<0.0100
Iron	mg/L	NS	0.3	22.2	21.8
Lead	mg/L	0.05	NS	NA	<0.0100
Magnesium	mg/L	NS	NS	NA	110
Manganese	mg/L	NS	0.05	1.05	0.989
Mercury	mg/L	0.002	NS	NA	<0.000200
Potassium	mg/L	NS	NS	NA	7.25
Selenium	mg/L	0.05	NS	NA	<0.0200
Silver	mg/L	0.13	NS	NA	NA
Sodium	mg/L	NS	NS	NA	225
Strontium	mg/L	NS	NS	1.91	1.94
Zinc	mg/L	5	NS	NA	0.0254
<b>Anions</b>					
Bromide	mg/L	NS	NS	1.00	2.14
Chloride	mg/L	NS	250	831	606
Sulfate	mg/L	NS	250	1.03	5.02
<b>Alkalinity</b>					
Bicarbonate Alkalinity	mg/L	NS	NS	554	578
Carbonate Alkalinity	mg/L	NS	NS	<1.0	<10.0
Total Alkalinity	mg/L	NS	NS	NA	578
Total Dissolved Solids (TDS)	mg/L	NS	500	2170	2120
Specific Conductivity	umhos/cm	NS	NS	NA	NA
<b>BTEX Compounds</b>					
Benzene	mg/L	0.0011	NS	<0.005	<0.00500
Ethylbenzene	mg/L	2.4	NS	<0.005	<0.00500
Toluene	mg/L	6.1	NS	<0.005	<0.0100
Xylene (total)	mg/L	10	NS	<0.015	<0.0500
<b>Hydrocarbon Fractions</b>					
TPH-D	mg/L	1.0	NS	NA	<0.134
TPH-O	mg/L	1.0	NS	NA	<0.124
TPH-G	mg/L	1.3	NS	NA	<0.150
Aliphatic C6-C8	mg/L	170	NS	<0.030	NA
Aliphatic >C8-C10	mg/L	3.4	NS	<0.020	NA
Aliphatic >C10-C12	mg/L	3.4	NS	<0.100	NA
Aliphatic >C12-C16	mg/L	3.4	NS	<0.100	NA
Aliphatic >C16-C35	mg/L	67	NS	<0.150	NA
Aromatic >C8-C10	mg/L	1.3	NS	<0.030	NA
Unadjusted >C10-C12 Aromatics	mg/L	1.3	NS	<0.100	NA
Unadjusted >C12-C16 Aromatics	mg/L	1.3	NS	<0.100	NA
Unadjusted >C16-C21 Aromatics	mg/L	1.0	NS	<0.100	NA
Aromatic >C21-C35	mg/L	1.0	NS	0.242	NA
<b>Radium</b>					
Radium 226	pCi/L	NS	NS	1.37	0.939
Radium 228	pCi/L	NS	NS	1.72	1.04
Radium 226+228	pCi/L	NS	NS	3.09	1.979
Total Dissolved Solids (TDS)	mg/L	NS	500	NA	NA

**Notes:**

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**Table 7**  
**Groundwater Field Parameters**  
*Jeanerette Lumber v. ConocoPhillips Company, et al.*  
*Bayou Pigeon Oil Gas Field*  
*Iberia Parish, Louisiana*

<b>Well ID JLS-10</b>							
Date	7/30/2020						
DTW	9.64'						
TD	42.64'						
Stickup	6.72'						
Method	Peristaltic Pump						
Time	Gal	Temp (°C)	pH	Cond (µs)	ORP	Turb	TDS
9:30	0.00	25.9	6.66	2045	107	92	1468
9:36	0.50	24.1	6.32	2025	-7	53	1462
9:51	1.00	26.3	6.40	2083	-61	37	1502
10:11	1.50	27.5	6.69	2094	-85	9	1508
10:47	2.00	27.5	7.01	2072	-101	9	1488
10:55	Collect JLS-10, no radium collected						
<b>Well ID JLS-11</b>							
Date	7/30/2020						
DTW	2.85'						
DTW	12.05'						
TD	37.2						
Stickup	5'						
Method	Peristaltic Pump						
Time	Gal	Temp (°C)	pH	Cond (ms)	ORP	Turb	TDS
16:07	0.0	26.1	6.38	78.31	-84	OR	105.2
16:12	0.5	25.3	6.29	79.74	-72	58	107.1
16:18	1.0	25.9	6.20	81.11	-65	18	106.9
16:30	1.75	24.7	6.15	80.66	-61	24	108.5
16:35	Sample Taken: Rads included						
<b>Well ID JLS-14</b>							
Date	8/5/2020						
DTW	2.90'						
TD	53.10'						
Stickup	5.20'						
Method	Peristaltic Pump						
Time	Gal	Temp (°C)	pH	Cond (µs)	ORP	Turb	TDS
1320	0.0	29.5	7.00	1557	40	OR	1102
1328	1.0	27.5	7.11	1472	-88	OR	1028
1334	2.0	27.4	7.10	1465	-92	87	1025
1340	3.0	25.9	7.19	1456	-84	62	1019
1345	3.5	25.4	7.13	1458	-91	12	1021
1350	Begin Sampling						
1410	Finish Sampling						
<b>Well ID JLS-17</b>							
Date	8/7/2020						
DTW	3.34'						
TD	52.65'						
Stickup	5.19'						
Method	Peristaltic Pump						
Time	Gal	Temp (°C)	pH	Cond (µs)	ORP	Turb	TDS
1453	0.0	30.9	7.48	1588	46	OR	1097
1502	1.0	25.5	7.45	1574	-13	OR	1112
1507	2.0	24.9	7.36	1577	-47	50	1117
1514	3.0	23.1	7.14	1587	-92	30	1115
1517	3.5	22.8	7.10	1586	-92	25	1117
1525	Sampling JLS-17 ICON w/ HET taking split						
1545	Finish sampling JLS-17						



**Table 7**  
**Groundwater Field Parameters**  
*Jeanerette Lumber v. ConocoPhillips Company, et al.*  
*Bayou Pigeon Oil Gas Field*  
*Iberia Parish, Louisiana*

<b>Well ID MW-1</b>							
Date	2/9/2021						
DTW	4.73'						
TD	34.19'						
Stickup (mudline)	7.10'						
Method	Peristaltic Pump						
Time	Gal	Temp (°C)	pH	Cond (µs)	ORP	Turb	TDS
926	0.0	18.0	8.21	2022	33	152	NA
929	0.5	20.1	6.88	4033	-67	359	NA
934	1.0	20.5	6.38	4313	-81	94	NA
937	1.5	20.5	6.31	4300	-87	OR	NA
940	2.0	20.5	6.29	4283	-92	OR	NA
943	3.0	20.6	6.29	4358	-97	91.4	NA
947	4.0	20.7	6.29	4375	-101	41.9	NA
952	5.0	20.7	6.34	4352	-97	40.7	NA
957	6.00	20.8	6.30	4347	-94	32.5	NA
1003	7.00	20.8	6.35	4367	-93	16.4	NA
1006	7.50	20.7	6.35	4357	-96	17.1	NA
1010	8.0	20.8	6.36	4351	-92	16.3	NA
1015	Begin Sampling at MW-1						
1038	Finish Sampling						
<b>Well ID MW-2</b>							
Date	2/9/2021						
DTW	4.41'						
TD	36.03'						
Stickup(mudline)	8.63'						
Method	Peristaltic Pump						
Time	Gal	Temp (°C)	pH	Cond (µs)	ORP	Turb	TDS
1255	0.0	21.5	7.64	1037	-92	25.3	NA
1303	1.0	22.5	7.65	1573	-49	OR	NA
1318	2.0	23.0	7.13	1915	-53	416	NA
1327	2.5	22.5	6.95	1961	-68	165	NA
1335	3.0	22.7	6.87	1973	-76	77.6	NA
1345	3.5	22.9	6.83	1980	-76	63.6	NA
1352	4.00	22.6	6.82	1983	-74	64.2	NA
1401	4.50	22.5	6.85	1988	-70	28.3	NA
1411	5.00	22.5	6.82	1985	-69	48.9	NA
1415	Begin Sampling at MW-2						
1500	Finish Sampling						
<b>Well ID MW-3</b>							
Date	2/9/2021						
DTW	4.23'						
TD	34.55'						
Stickup (mudline)	7.37'						
Method	Peristaltic Pump						
Time	Gal	Temp (°C)	pH	Cond (µs)	ORP	Turb	TDS
1101	0.0	20.6	8.39	494.10	-190	160	NA
1107	1.0	20.9	8.36	2642	-130	OR	NA
1111	2.0	21.0	7.04	2901	-84	186	NA
1116	3.0	21.3	6.69	3167	-78	114	NA
1122	4.0	21.2	6.58	3280	-76	63.8	NA
1128	5.0	21.2	6.54	3304	-76	72.7	NA
1134	6.0	21.3	6.51	3342	-79	59.8	NA
1140	7.0	21.8	6.50	3368	-76	32.5	NA
1147	8.0	22.1	6.48	3356	-74	27.1	NA
1156	9.0	22.0	6.54	3383	-70	17.9	NA
1203	10.0	21.9	6.54	3361	-69	22.1	NA
1211	11.0	21.9	6.60	3379	-70	25.3	NA
1215	Begin Sampling at MW-3						
1235	Finished Sampling						

Notes:  
 NA = Not Analyzed

Table 8  
**Surface Water Analytical Data**  
 Jeanerette Lumber v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil Gas Field  
 Iberia Parish, Louisiana

		Sample ID	SW-1 (UPSTREAM)	SW-2 (SITE ENTRANCE)	SW-3 (SITE CANAL)	SW-4 (SITE)	SW-5 (DOWNSTREAM)
		Sample Date:	2/25/2021	2/25/2021	2/25/2021	2/25/2021	2/25/2021
Parameters	Units	LDEQ Numerical Criteria	ERM	ERM	ERM	ERM	ERM
Chloride <sup>(1)</sup>	mg/L	65	26.5	26.8	27.2	26.7	26.3
Specific Conductance	umhos/cm	NS	259	259	271	270	266

**Notes:**

<sup>(1)</sup> Listed limit is the LDEQ numerical surface water criteria for Drainage Basin Subsegment #010501.

< - Not detected at or above the reporting limit shown

NA - Not analyzed; NS - No Standard

**Table 9**  
**RECAP SCREENING EVALUATION FOR SURFACE SOIL / SEDIMENT (0-3')**  
**NON-INDUSTRIAL DIRECT CONTACT**

Jeanerette Lumber & Shingle Co., LLC v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil & Gas Field  
 Iberia Parish, Louisiana

Parameter (a)	Soilssni (b)	Area 2 Maximum Concentrations (0-3') (c)	
		East-West Canal	North-South Canal
<b>Metals (mg/kg-wet)</b>			
Arsenic	12	7.74	3.88
Barium	550	953	110
Cadmium	3.9	<1.24 [0.409]	0.29
Chromium	12000	14.4	9.3
Lead	400	13.4	9.8
Mercury	2.3	<0.107 [0.0377]	0.058
Selenium	39	<9.9	-
Silver	39	<0.5	-
Strontium (d)	4700	73	24.3
Zinc	2300	53.6	39
<b>TPH Mixtures (mg/kg-wet) (e)</b>			
TPH-DRO (>C10-C28)	65	493 F	-
TPH-ORO (>C28-C35)	180	432 F	-
<b>TPH Fractions (mg/kg-wet) (e)</b>			
Aliphatic >C6-C8	1200	<60.8	-
Aliphatic >C8-C10	120	<60.8	-
Aliphatic >C10-C12	230	<15	-
Aliphatic >C12-C16	370	28	-
Aliphatic >C16-C35	7100	89.3	-
Aromatic >C8-C10	65	<56	-
Aromatic >C10-C12	120	<10	-
Aromatic >C12-C16	180	17.2	-
Aromatic >C16-C21	150	22.6	-
Aromatic >C21-C35	180	38	-
<b>PAHs (mg/kg-wet)</b>			
2-Methylnaphthalene	22	0.014	-
Acenaphthene	370	0.015	-
Acenaphthylene	350	<0.0066	-
Anthracene	2200	<0.0033	-
Benzo(a)anthracene	0.62	0.00984	-
Benzo(a)pyrene	0.33	0.00407	-
Benzo(b)fluoranthene	0.62	<0.0066	-
Benzo(k)fluoranthene	6.2	0.00562	-
Chrysene	62	0.014	-
Dibenz(a,h)anthracene	0.33	<0.0066	-
Fluoranthene	220	0.042	-
Fluorene	280	0.014	-
Indeno(1,2,3-cd)pyrene	0.62	0.00551	-
Naphthalene	6.2	<0.0033	-
Phenanthrene	2100	0.026	-
Pyrene	230	0.04	-

**Table 9**  
**RECAP SCREENING EVALUATION FOR SURFACE SOIL / SEDIMENT (0-3')**  
**NON-INDUSTRIAL DIRECT CONTACT**

Jeanerette Lumber & Shingle Co., LLC v. ConocoPhillips Company, et al.  
Bayou Pigeon Oil & Gas Field  
Iberia Parish, Louisiana

Notes:

- Analyte was not analyzed in the respective area

< - Not detected at or above the reporting limit shown.

<# [#] - Reporting limit exceeded maximum concentration. Maximum reported concentration shown in brackets.

F - Fraction data available, therefore mixture data are not further evaluated in risk evaluation.

TPH - Total Petroleum Hydrocarbons

DRO - Diesel Range Organics

ORO - Oil Range Organics

PAH - Polycyclic Aromatic Hydrocarbons

Bold and shaded values exceed the Soilssni and are identified for further risk evaluation of the direct contact pathway under a higher Management Option.

- (a) Parameters applicable to RECAP that were analyzed in soil/sediment samples collected from the 0 to 3 foot interval (0-3') at the site by ERM, HET, and ICON (samples collected from the 2-4' interval were included).
- (b) Soilssni is the RECAP Screening Option Standard from Table 1 of RECAP 2003 for soil protective of nonindustrial land use.
- (c) The maximum reported concentration in soil and sediment samples collected from the site, including ERM, HET, and ICON samples. The North-South canal includes sampling locations JLS-14, JLS-15, JLS-16, and JLS-17. The East-West canal includes all other sampling locations in Area 2 (i.e., those within and adjacent to the canal that included the former Chevron operations area). For constituents for which a reporting limit was higher than the maximum detected concentration, both are shown, with the highest reported concentrations in brackets.
- (d) Soilssni not provided in RECAP; the risk-based value was calculated in accordance with Appendix H of RECAP 2003.
- (e) Appendix D of RECAP identifies: "If TPH fractionation data and TPH mixture data have both been collected at an AOI and the two data sets yield different conclusions about management of the AOI, then management decisions shall be based on the fractionation data since the fractionation method yields more specific information regarding the TPH constituents present and thus more accurately characterizes site conditions." TPH fraction data are available for sample locations and intervals with TPH mixture data and are therefore used in the risk assessment in accordance with RECAP.

**Table 10**  
**RECAP SCREENING EVALUATION FOR SURFACE SOIL / SEDIMENT (0-15')**  
**NON-INDUSTRIAL DIRECT CONTACT**

Jeanerette Lumber & Shingle Co., LLC v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil & Gas Field  
 Iberia Parish, Louisiana

Parameter (a)	Soilssni (b)	Area 2 Maximum Concentrations (0-15') (c)	
		East-West Canal	North-South Canal
<b>Metals (mg/kg-wet)</b>			
Arsenic	12	10.5	4.24
Barium	550	<b>2040</b>	131
Cadmium	3.9	<1.24 [0.409]	0.4
Chromium	12000	14.4	10
Lead	400	13.4	11.3
Mercury	2.3	<0.107 [0.0377]	0.058
Selenium	39	<9.9	-
Silver	39	<0.5	-
Strontium (d)	4700	73	38.8
Zinc	2300	53.6	39
<b>TPH Mixtures (mg/kg-wet) (e)</b>			
TPH-DRO (>C10-C28)	65	1900 F	-
TPH-ORO (>C28-C35)	180	622 F	-
<b>TPH Fractions (mg/kg-wet) (e)</b>			
Aliphatic >C6-C8	1200	181	-
Aliphatic >C8-C10	120	<b>313</b>	-
Aliphatic >C10-C12	230	46.5	-
Aliphatic >C12-C16	370	188	-
Aliphatic >C16-C35	7100	329	-
Aromatic >C8-C10	65	<b>216</b>	-
Aromatic >C10-C12	120	<10	-
Aromatic >C12-C16	180	20.9	-
Aromatic >C16-C21	150	24.2	-
Aromatic >C21-C35	180	59.4	-
<b>PAHs (mg/kg-wet)</b>			
2-Methylnaphthalene	22	0.7	-
Acenaphthene	370	0.132	-
Acenaphthylene	350	<0.066	-
Anthracene	2200	<0.033	-
Benzo(a)anthracene	0.62	<0.066 [0.00984]	-
Benzo(a)pyrene	0.33	<0.033 [0.00407]	-
Benzo(b)fluoranthene	0.62	<0.066	-
Benzo(k)fluoranthene	6.2	<0.033 [0.00562]	-
Chrysene	62	0.076	-
Dibenz(a,h)anthracene	0.33	<0.066	-
Fluoranthene	220	0.252	-
Fluorene	280	0.441	-
Indeno(1,2,3-cd)pyrene	0.62	<0.033 [0.00551]	-
Naphthalene	6.2	0.177	-
Phenanthrene	2100	0.381	-
Pyrene	230	0.148	-

**Table 10**  
**RECAP SCREENING EVALUATION FOR SURFACE SOIL / SEDIMENT (0-15')**  
**NON-INDUSTRIAL DIRECT CONTACT**

Jeanerette Lumber & Shingle Co., LLC v. ConocoPhillips Company, et al.  
Bayou Pigeon Oil & Gas Field  
Iberia Parish, Louisiana

Notes:

- Analyte was not analyzed in the respective area

< - Not detected at or above the reporting limit shown.

<# [#] - Reporting limit exceeded maximum concentration. Maximum reported concentration shown in brackets.

F - Fraction data available, therefore mixture data are not further evaluated in risk evaluation.

TPH - Total Petroleum Hydrocarbons

DRO - Diesel Range Organics

ORO - Oil Range Organics

PAH - Polycyclic Aromatic Hydrocarbons

Bold and shaded values exceed the Soilssni and are identified for further risk evaluation of the direct contact pathway under a higher Management Option.

- (a) Parameters applicable to RECAP that were analyzed in soil/sediment samples collected from the 0 to 15 foot interval (0-15') at the site by ERM, HET, and ICON.
- (b) Soilssni is the RECAP Screening Option Standard from Table 1 of RECAP 2003 for soil protective of nonindustrial land use.
- (c) The maximum reported concentration in soil and sediment samples collected from the site, including ERM, HET, and ICON samples. The North-South canal includes sampling locations JLS-14, JLS-15, JLS-16, and JLS-17. The East-West canal includes all other sampling locations in Area 2 (i.e., those within and adjacent to the canal that included the former Chevron operations area). For constituents for which a reporting limit was higher than the maximum detected concentration, both are shown, with the highest reported concentrations in brackets.
- (d) Soilssni not provided in RECAP; the risk-based value was calculated in accordance with Appendix H of RECAP 2003.
- (e) Appendix D of RECAP identifies: "If TPH fractionation data and TPH mixture data have both been collected at an AOI and the two data sets yield different conclusions about management of the AOI, then management decisions shall be based on the fractionation data since the fractionation method yields more specific information regarding the TPH constituents present and thus more accurately characterizes site conditions." TPH fraction data are available for sample locations and intervals with TPH mixture data and are therefore used in the risk assessment in accordance with RECAP.

**Table 11**  
**MO-3 DIRECT CONTACT EVALUATION**  
**SOIL/SEDIMENT**

Jeanerette Lumber & Shingle Co., LLC v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil & Gas Field  
 Iberia Parish, Louisiana

Constituents of Concern <sup>(a)</sup>	Initial Direct Contact RS		Target Organ/ System <sup>(d)</sup>	Additivity Divisor <sup>(e)</sup>	Final Direct Contact RS <sup>(f)</sup>		Soil <sub>Sat</sub> <sup>(g)</sup>	JLS-2 AOIC <sup>(h)</sup>	
	MO-1 Soil <sup>(b)</sup>	MO-3 Soil <sub>rec</sub> <sup>(c)</sup>			MO-1 Soil	MO-3 Soil <sub>rec</sub>		0-3'	0-15'
<b>Metals (mg/kg-wet)</b>									
Barium	140000	52500	Kidney	1	140000	52500	NA	953	2040
<b>TPH Fractions (mg/kg-wet)</b>									
Aliphatic >C8-C10	8800	16800	Liver, Hemat.	1	8800	16800	NA	<60.8	313
Aromatic >C8-C10	5100	10300	BW	1	5100	10300	NA	<56	216

Notes:

NA - Not Applicable.

< - Not detected at or above the reporting limit shown.

MO-1 - Management Option 1

MO-3 - Management Option 3

Grey font - result below screening standard

(a) Constituents with concentrations that exceed RECAP Soilssni were included for further evaluation under MO-1 and MO-3 for direct contact.

(b) Default MO-1 industrial RECAP Standard for direct contact with soil, taken from Table 2 of RECAP 2003.

(c) MO-3 recreational RECAP Standards for children and adults were calculated using the EPA's Regional Screening Level (RSL) calculator for recreational exposure to soil/sediment, available at <https://www.epa.gov/risk/regional-screening-levels-rsls>. Standards were calculated using default EPA toxicological values and exposure assumptions with the following exceptions (see input and output in Table N-10):

**Toxicological Values** - default value not provided by EPA for RECAP-defined fractions; the toxicological values and ABS values provided in RECAP (2003) were used for TPH

**Exposure Duration (ED), years** - the adult ED was increased to reflect a total ED of 30 years, consistent with the RECAP residential ED.

**Exposure Frequency (EF), days/year** - default value not provided by EPA; a site-specific EF of 104 days/year was used to reflect a visitation frequency of twice a week or daily for over 3 months.

**Exposure Time (ET), hours/day** - default value not provided by EPA; a site-specific ET of 2 hours/day was assumed.

(d) Target Organ for assessing additive effects for noncarcinogenic COCs, obtained from Appendices D and G of RECAP (2003).

(e) Additivity divisor for noncarcinogenic effects on the same target/organ system.

(f) For each land use assumption, the Final Direct Contact RS is the Initial Direct Contact RS divided by the additivity divisor. RECAP identifies an aesthetic cap for total petroleum hydrocarbons of 10,000 mg/kg. The risk-based standard is shown in this table to provide a risk assessment.

(g) Soil saturation limit. Not applicable for these constituents.

(h) Area of Investigation Concentration (AOIC) is the maximum reported concentration in the JLS-2 Area of Investigation (AOI).

**Table 12**  
**GROUNDWATER SCREENING EVALUATION**

Jeanerette Lumber & Shingle Co., LLC v. ConocoPhillips Company, et al.  
Bayou Pigeon Oil & Gas Field  
Iberia Parish, Louisiana

Constituents (a)	GWss (b)	SMCL (c)	Maximum Groundwater Concentration (d)	
			30-ft Zone	50-ft Zone
<b>Metals - Total</b>				
Arsenic	0.01	-	<b>0.11</b>	<b>0.44</b>
Barium	2	-	<b>77.2</b>	0.58
Cadmium	0.005	-	<0.05	<0.001
Calcium (g)	-	-	4260	103
Chromium	0.1	-	<0.1	0.003
Iron (e)	-	0.3	<b>424</b>	<b>13.7</b>
Lead	0.015	-	<0.1	0.0053
Magnesium (g)	-	-	1320	35.3
Manganese (e)	-	0.05	<b>17.4</b>	<b>0.55</b>
Mercury	0.002	-	<0.0002	<0.0002
Potassium (g)	-	-	57	7.96
Selenium	0.05	-	<0.02	<0.001
Silver	0.018	-	-	<0.001
Sodium (g)	-	-	18300	215
Strontium (f)	2.2	-	<b>60.7</b>	0.72
Zinc	1.1	-	0.27	0.021
<b>Metals-Dissolved</b>				
Arsenic	0.01	-	<b>0.1</b>	<b>0.449</b>
Barium	2	-	<b>66.1</b>	0.495
Cadmium	0.005	-	<0.025	<b>0.0131</b>
Calcium (g)	-	-	291	93.9
Chromium	0.1	-	<0.1	<0.01
Iron (e)	-	0.3	<b>31.4</b>	<b>10.1</b>
Lead	0.015	-	<0.025	<0.01
Magnesium (g)	-	-	110	31.2
Manganese (e)	-	0.05	<b>1.46</b>	<b>0.447</b>
Mercury	0.002	-	<0.0002	<0.0002
Potassium (g)	-	-	7.25	9.08
Selenium	0.05	-	<0.02	<0.001
Silver	0.018	-	-	<0.001
Sodium (g)	-	-	261	207
Strontium (f)	2.2	-	<b>48.3</b>	0.705
Zinc	1.1	-	0.23	<0.02
<b>Water Quality Parameters</b>				
Chloride	-	250	<b>42700</b>	210
<b>BTEX Compounds</b>				
Benzene	0.005	-	<0.005	<0.005
Ethylbenzene	0.7	-	<0.005	<0.005
Toluene	1	-	0.01	<0.01
Xylene (total)	10	-	<0.05	<0.05



**Table 12**  
**GROUNDWATER SCREENING EVALUATION**

Jeanerette Lumber & Shingle Co., LLC v. ConocoPhillips Company, et al.  
Bayou Pigeon Oil & Gas Field  
Iberia Parish, Louisiana

Constituents (a)	GWss (b)	SMCL (c)	Maximum Groundwater Concentration (d)	
			30-ft Zone	50-ft Zone
<b>TPH Mixtures (h)</b>				
TPH-G	0.15	-	0.311 F	<0.15 F
TPH-D	0.15	-	0.355 F	0.303 F
TPH-O	0.15	-	0.215 F	0.197 F
<b>TPH Fractions (h)</b>				
Aliphatic >C6-C8	3.2	-	0.032	<0.03
Aliphatic >C8-C10	0.15	-	<0.020	<0.020
Aliphatic >C10-C12	0.15	-	<0.100	<0.100
Aliphatic >C12-C16	0.15	-	<0.100	<0.100
Aliphatic >C16-C35	7.3	-	<0.150	<0.150
Aromatic >C8-C10	0.15	-	<0.030	<0.030
Aromatic >C10-C12	0.15	-	<0.100	<0.100
Aromatic >C12-C16	0.15	-	<0.100	<0.100
Aromatic >C16-C21	0.15	-	<0.100	<0.100
Aromatic >C21-C35	0.15	-	<b>0.242</b>	<0.1

Notes:

Units in mg/L.

- Standard not applicable

TPH - Total Petroleum Hydrocarbons

BTEX - Benzene, Toluene, Ethylbenzene, and Xylene

F - Fraction data available, therefore mixture data are not further evaluated in risk evaluation.

< - Not detected at the detection limit shown

A bold value with shading indicates that the maximum reported concentration exceeds the GWss or SMCL and is identified as subject to further risk evaluation under a higher Management Option.

A bold value with no shading indicates that the maximum reported concentration exceeds the GWss or SMCL but is not identified for further risk evaluation under a higher Management Option.

(a) Constituents analyzed in groundwater samples collected from the site by ERM, HET, and ICON.

(b) GWss = RECAP Screening Standard from Table 1 of RECAP (2003).

(c) EPA Secondary Maximum Contaminant Level (SMCL), a non-enforceable guideline for public water systems addressing undesirable aesthetic effects such as taste, color, and odor.

(d) Maximum reported concentrations in groundwater samples collected in each groundwater zone.

(e) Iron and manganese are naturally elevated above the SMCL (used as a screening standard) in groundwater in this site location as documented in independent studies by the USGS and in unimpacted wells on the property. Arsenic is also naturally elevated and was reported at maximum concentration in the 50' zone where E&P indicators were not elevated.

(f) GWss not provided in RECAP; the risk-based value was calculated in accordance with Appendix H of RECAP (2003).

(g) Essential elements have no RECAP standards or toxicity factors (i.e. calcium, magnesium, potassium, sodium), and are not addressed in risk evaluation.

(h) TPH fraction data are available for all locations with TPH mixture data and are used in the risk assessment in accordance with Appendix D of RECAP (2003).

**Table 13**  
**EXAMPLE MO-1 GROUNDWATER EVALUATION - 30-FT ZONE**

Jeanerette Lumber & Shingle Co., LLC v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil & Gas Field  
 Iberia Parish, Louisiana

Constituents (a)	Initial MO-1 GW3DW (b)	DF3 (c)	Final MO-1 GW3DW (d)	Water Sol (e)	Limiting MO-1 RS (f)	Compliance Concentration (g)	
						Total	Dissolved
<b>Metals (mg/L)</b>							
Arsenic	0.05	440	22	-	22	0.11	0.1
Barium	2	440	880	-	880	77.2	66.1
Strontium (h)	13	440	5720	-	5720	60.7	48.3
<b>TPH Fractions (mg/L)</b>							
Aromatic >C21-C35	1	440	440	-	440	0.242	-
<b>Water Quality (mg/L)</b>							
Chloride	65-250 (i)	440	28,600-110,000	-	28,600-110,000	42,700	-

Notes:

- Not Applicable or not analyzed

MO-1 - Management Option 1, applicable based on soil AOI of ≤0.5 acre.

- (a) Constituents shown include those with constituent concentrations above the default GWSS identified for site-specific assessment under Management Option 1.
- (b) MO-1 GW3DW - RECAP Standard (RS) from Table 3 of RECAP (2003) for Class 3 groundwater that may hypothetically discharge to a downgradient surface water body that is classified as a drinking water source (i.e., Subsegment 010501, with designated uses of recreation, fish and wildlife propagation, and drinking water supply per LAC 33:IX.1123). Although the pathway of groundwater to surface water discharge was identified as incomplete, for purposes of demonstration, an example MO-1 calculation of standards for the 30-foot zone groundwater is provided to demonstrate the magnitude of MO-1 standards.
- (c) DF3 - MO-1 default longitudinal Dilution Attenuation Factor for Class 3 groundwater, representative of attenuation of constituent concentrations from the POC to the nearest potential receiving surface water body. The DF3 values were obtained from Appendix H of RECAP (2003) as a function of x (>2000 ft) and Sd (<5 ft) for the 30-foot zone.
- (d) Final MO-1 GW3DW for Class 3 ground water, equal to the initial GW3DW multiplied by the DF3.
- (e) Groundwater solubility from Table 3 of RECAP (2003).
- (f) The limiting MO-1 RS is the lowest of the Final GW3DW and Water Sol (not applicable for these constituents).
- (g) Maximum reported concentration in monitoring wells in the 30-foot zone in Area 2.
- (h) Standard not provided in RECAP; the risk-based value was calculated in accordance with Appendix H of RECAP (2003).
- (i) In accordance with RECAP, the initial standard is taken from LAC 33:IX.1123 for Subsegment 010501 (65 mg/L) and from LAC 33:IX.1113.C, which identifies 250 mg/L as the standard for chlorides in unlisted water bodies including the site canals.

**Table 14**  
**RECAP SCREENING EVALUATION FOR SOIL / SEDIMENT**  
**GROUNDWATER PROTECTION**

Jeanerette Lumber & Shingle Co., LLC v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil & Gas Field  
 Iberia Parish, Louisiana

Parameter (a)	Soilsgw (b)	Area 2 Maximum Concentrations (c)	
		East-West Canal	North-South Canal
<b>Metals (mg/kg-dry)</b>			
Arsenic	100	25	10.2
Barium	2000	4857 / SPLP	244
Cadmium	20	<3.97 [0.929]	0.9
Chromium	100	35.3	19.4
Lead	100	34.6	20.5
Mercury	4	<0.366 [0.0987]	0.119
Selenium	20	<31.8	-
Silver	100	<2.04	-
Strontium (d)	44000	198	113
Zinc	2800	159	78.6
<b>TPH Mixtures (mg/kg-dry) (e)</b>			
TPH-DRO	65	4623 F	-
TPH-ORO	10000	1799 F	-
<b>TPH Fractions (mg/kg-dry) (e)</b>			
Aliphatic >C6-C8	10000	400	-
Aliphatic >C8-C10	5300	692	-
Aliphatic >C10-C12	10000	149	-
Aliphatic >C12-C16	10000	603	-
Aliphatic >C16-C35	10000	1054	-
Aromatic >C8-C10	65	<b>478</b>	-
Aromatic >C10-C12	100	<39	-
Aromatic >C12-C16	200	67	-
Aromatic >C16-C21	2100	77.6	-
Aromatic >C21-C35	10000	190	-
<b>PAHs (mg/kg-dry)</b>			
2-Methylnaphthalene	1.7	1.5	-
Acenaphthene	220	0.292	-
Acenaphthylene	88	<0.157	-
Anthracene	120	<0.079	-
Benzo(a)anthracene	330	<0.157 [0.0358]	-
Benzo(a)pyrene	23	<0.079 [0.009]	-
Benzo(b)fluoranthene	220	<0.157	-
Benzo(k)fluoranthene	120	<0.079 [0.0125]	-
Chrysene	76	0.168	-
Dibenz(a,h)anthracene	540	<0.157	-
Fluoranthene	1200	0.558	-
Fluorene	230	0.976	-
Indeno(1,2,3-cd)pyrene	9.2	<0.079 [0.0151]	-

**Table 14**  
**RECAP SCREENING EVALUATION FOR SOIL / SEDIMENT**  
**GROUNDWATER PROTECTION**

Jeanerette Lumber & Shingle Co., LLC v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil & Gas Field  
 Iberia Parish, Louisiana

Parameter (a)	Soilssgw (b)	Area 2 Maximum Concentrations (c)	
		East-West Canal	North-South Canal
Naphthalene	1.5	0.392	-
Phenanthrene	660	0.843	-
Pyrene	1100	0.327	-
<b>Leachate (mg/L)</b>			
SPLP Arsenic	0.2	0.0012	-
SPLP Barium	40	0.099	-
SPLP Cadmium	0.1	<0.001	-
SPLP Zinc	22	<0.02	-

Notes:

- Analyte was not analyzed in the respective area

< - Not detected at or above the reporting limit shown.

<# [#] - Reporting limit exceeded maximum concentration. Maximum reported concentration shown in brackets.

F - Fraction data available, therefore mixture data are not further evaluated in risk evaluation.

TPH - Total Petroleum Hydrocarbons

DRO - Diesel Range Organics

ORO - Oil Range Organics

PAH - Polycyclic Aromatic Hydrocarbons

Bold and shaded values exceed the Soilssgw and are identified for further risk evaluation of the groundwater protection pathway under a higher Management Option.

- (a) Parameters applicable to RECAP that were analyzed in soil/sediment samples collected from the site by ERM, HET, and ICON.
- (b) Soilssgw is the RECAP Screening Option Standard from Table 1 of RECAP 2003 for soil protective of groundwater.
- (c) The maximum reported concentration in soil and sediment samples collected from each area, including ERM, HET, and ICON samples. The North-South canal includes sampling locations JLS-14, JLS-15, JLS-16, and JLS-17. The East-West canal includes all other sampling locations in Area 2 (i.e., those within and adjacent to the canal that included the former Chevron operations area). For constituents for which a reporting limit was higher than the maximum detected concentration, both are shown, with the highest reported concentrations in brackets.
- (d) Soilssgw not provided in RECAP; the risk-based value was calculated in accordance with Appendix H of RECAP 2003.
- (e) Appendix D of RECAP identifies: "If TPH fractionation data and TPH mixture data have both been collected at an AOI and the two data sets yield different conclusions about management of the AOI, then management decisions shall be based on the fractionation data since the fractionation method yields more specific information regarding the TPH constituents present and thus more accurately characterizes site conditions." TPH fraction data are available for sample locations and intervals with TPH mixture data and are therefore used in the risk assessment in accordance with RECAP.

**Table 15**  
**EXAMPLE MO-1 EVALUATION FOR SOIL / SEDIMENT**  
**GROUNDWATER PROTECTION**

Jeanerette Lumber & Shingle Co., LLC v. ConocoPhillips Company, et al.  
 Bayou Pigeon Oil & Gas Field  
 Iberia Parish, Louisiana

Constituents of Concern <sup>(a)</sup>	Default MO-1 SoilGW3DW <sup>(b)</sup>	DF3 <sup>(c)</sup>	Final MO-1 SoilGW3DW <sup>(d)</sup>	Soil <sub>Sat</sub> <sup>(e)</sup>	JLS-2 AOIC <sup>(f)</sup>
<b>TPH Fractions (mg/kg-dry)</b>					
Aromatic >C8-C10	260	440	114400	NA	478

Notes:

TPH - Total Petroleum Hydrocarbons

NA - Not Applicable

MO-1 - Management Option 1

- (a) Constituents with concentrations above the Soilssgw in Area 2 were included for further evaluation under MO-1 for protection of groundwater.
- (b) MO-1 SoilGW3DW - RECAP Standard (RS) from Table 2 of RECAP (2003) for soil protective of Class 3 groundwater that may hypothetically discharge to a downgradient surface water body that is classified as a drinking water source (i.e., Subsegment 010501, with designated uses of recreation, fish and wildlife propagation, and drinking water supply per LAC 33:IX.1123). Although the pathway of groundwater to surface water discharge was identified as incomplete, for purposes of demonstration, an example MO-1 calculation of standards for soil-to-groundwater protection is provided to demonstrate the magnitude of MO-1 standards.
- (c) DF3 - MO-1 default longitudinal Dilution Attenuation Factor for Class 3 ground water, representative of attenuation of constituent concentrations from the POC to the nearest potential receiving surface water body. The DF3 values were obtained from Appendix H of RECAP (2003) as a function of x (>2000 ft) and Sd (<5 ft) for the 30-foot zone.
- (d) Final MO-1 SoilGW3DW for Class 3 ground water, equal to the default SoilGW3DW multiplied by the DF3. RECAP identifies an aesthetic cap for total petroleum hydrocarbons of 10,000 mg/kg. The risk-based standard is shown in this table to provide a risk assessment.
- (e) Soil saturation limit. Not applicable for TPH fractions.
- (f) Area of Investigation Concentration (AOIC) is the maximum reported concentration in the JLS-2 Area of Investigation (AOI).

**Table 16  
Delineation Sampling Cost Estimate**

Jeanerette Lumber Shingle Co., LLC v. ConocoPhillips Company, et al.  
Bayou Pigeon Oil Gas Field  
Iberia Parish, Louisiana

	<b>Cost</b>	<b>Units</b>	<b>Quantity</b>	<b>Total</b>	<b>Cost Basis</b>
<b><u>Work Plan/Procurement</u></b>					
Coastal Use Permitting	\$5,000	lump sum	1	\$5,000	ERM Estimate
Develop Work Plan & HASP	\$3,000	lump sum	1	\$3,000	ERM Estimate
Site walk with contractors (WHE & GPRS)	\$6,000	lump sum	1	\$6,000	ERM Estimate
<i>Work Plan/Procurement Subtotal</i>				<u>\$14,000</u>	
<b><u>Soil Sampling and Well Installation</u></b>					
Geoprobe and Marsh Master Drill Rigs (includes mobilization/demobilization, well materials, crew, and per diem)	\$27,700	lump	1	\$30,470	05/11/2021 Walker Hill Estimate
Barge Mobilization/Demobilization	\$12,863	unit	1	\$14,149	ERM Estimate, Zealous Invoice
Barge Day Rate and Crew (includes barge, crew boat, tug boat, and fuel)	\$3,850	day	5	\$21,175	ERM Estimate, Zealous Invoice
ERM Oversight, Development, and Equipment	\$1,500	day	6	\$9,000	ERM Estimate
55-Gallon Drums for Purge Water and Soil IDW	\$63	unit	3	\$208	ERM Estimate, Walker Hill Estimate
Purge Water and Soil IDW Drum Disposal	\$150	unit	3	\$495	ERM Estimate, Aaron Oil (LA Wetlands), assume 2 drums soil, 1 drum water
Lab Analysis	\$7,000	lump	1	\$7,700	ERM Estimate
<i>Soil Sampling and Well Installation Subtotal</i>				<u>\$83,197</u>	
<b><u>Monitoring Well Decommissioning</u></b>					
ERM Oversight	\$1,500	day	1	\$1,500	ERM Estimate
Crew boat and captain	\$1,200	day	1	\$1,320	ERM Estimate
Drill crew and materials	\$2,500	lump	1	\$2,750	3/30/2021 Walker Hill quote
<i>Monitoring Well Decommissioning Subtotal</i>				<u>\$5,570</u>	
<b><u>Project Management and Reporting</u></b>					
Project management	\$5,000	lump	1	\$5,000	ERM Estimate
Data Evaluation and Reporting	\$15,000	lump	1	\$15,000	ERM Estimate
<i>Project Management and Reporting Subtotal</i>				<u>\$20,000</u>	
<b>Total Estimate:</b>				<b>\$122,767</b>	

**Table 17**  
**Groundwater Monitoring Plan Cost Estimate**

Jeanerette Lumber Shingle Co., LLC v. ConocoPhillips Company, et al.  
Bayou Pigeon Oil Gas Field  
Iberia Parish, Louisiana

	<u>Cost</u>	<u>Units</u>	<u>Quantity</u>	<u>Quarters</u>	<u>Total</u>	<u>Cost Basis</u>
<u>Monitoring Well Sampling - 3 Wells in JLS-2 Area</u>						
ERM 2-man field crew, truck, and sampling equipment	\$2,500	day	2	12	\$60,000	Assume sample 3 wells per day and mob/demob
Crew boat and captain	\$1,200	day	1	12	\$15,840	ERM Estimate
Lab Analysis - arsenic, barium, chloride, and radium-226/-228	\$250	sample	3	12	\$9,900	ERM Estimate
Purge water handling and disposal	\$2,500	lump	1	3	\$8,250	ERM Estimate, Aaron Oil (LA Wetlands), assume 1 drum water per year
<i>Monitoring Well Sampling Subtotal</i>					<u>\$93,990</u>	
<u>Monitoring Well Decommissioning (after 3 years)</u>						
ERM Oversight	\$1,500	day	1	1	\$1,500	ERM Estimate
Crew boat and captain	\$1,200	day	1	1	\$1,320	ERM Estimate
Drill crew and materials	\$2,500	lump	1	1	\$2,750	3/30/2021 Walker Hill quote
<i>Monitoring Well Decommissioning Subtotal</i>					<u>\$5,570</u>	
<u>Project Management and Reporting</u>						
Project management	\$5,000	year	1	3	\$15,000	ERM Estimate
Data Evaluation and Reporting	\$15,000	year	1	3	\$45,000	ERM Estimate
<i>Project Management and Reporting Subtotal</i>					<u>\$60,000</u>	
<b>Total Estimate</b>					<b>\$159,560</b>	

**Table 18**  
**Contingent Sediment Remediation Cost Estimate - Alternative 1**

Jeanerette Lumber Shingle Co., LLC v. ConocoPhillips Company, et al.  
Bayou Pigeon Oil Gas Field  
Iberia Parish, Louisiana

<u>Scope Assumptions</u>	<u>Quantity</u>	<u>Units</u>	<u>Basis</u>
<b><u>Capping</u></b>			
Area of Cap	16,329	square feet	Measured in ArcGIS (Figure 53)
Thickness of Cap	4	inches	ITRC Guidance
In-Place Volume of Cap Material	202	cubic yards	Calculation
AquaBlok Dry Bulk Density	85	lbs/ft <sup>3</sup>	Aquablok Spec Sheet
Weight of AquaBlok Needed	231	tons	Calculation
Freight	11	truckloads	Aquablok estimate - 21.6 tons per truckload

  

	<u>Unit Cost</u>	<u>Units</u>	<u>Quantity</u>	<u>Cost</u>	<u>Cost Basis</u>
<b><u>Work Plan/Procurement</u></b>					
Coastal Use Permitting	\$5,000	lump sum	1	\$5,000	ERM Estimate
Develop Work Plan	\$5,000	lump sum	1	\$5,000	ERM Estimate
Site walk with contractors, bid tab and review	\$5,000	lump sum	1	\$5,000	ERM Estimate
Meeting with LDNR, finalize Work Plan	\$7,500	lump sum	1	\$7,500	ERM Estimate
<i>Work Plan/Procurement Subtotal</i>				<u>\$22,500</u>	
<b><u>Cap Placement</u></b>					
Cap Placement Contractor Costs	\$95,195	lump sum	1	\$104,715	Zealous Quote
Construction Oversight (Labor and Expenses, Includes Crew Boat)	\$3,500	day	10	\$35,000	ERM Estimate
Turbidity Curtain Cost	\$827	10' x 50'	6	\$5,457	Paramount Materials Cost
Geotextile Fabric Cost	\$781	15' x 300' roll	6	\$5,155	Paramount Materials Cost
Geotextile Joining	\$500	lump sum	1	\$550	ERM Estimate
Geotextile and Turbidity Curtain Delivery	\$2,000	truckload	1	\$2,200	ERM Estimate
Turbidity Curtain Placement	\$3,000	lump sum	1	\$3,300	Zealous Quote
AquaBlok Cap Material Cost	\$225	ton	231	\$57,254	ERM Estimate, AquaBlock Quote
AquaBlok Cap Material Freight	\$3,000	truckload	11	\$36,300	ERM Estimate, AquaBlock Quote
				<u>\$249,930</u>	
<b><u>Closure Report and LDNR Meeting</u></b>					
Closure Report Preparation and Submittal	\$15,000	lump sum	1	\$15,000	ERM Estimate
Meeting with LDNR plus follow-up	\$7,500	lump sum	1	\$7,500	ERM Estimate
<i>Closure Reporting Subtotal</i>				<u>\$22,500</u>	
<b>Subtotal</b>				<b>\$294,930</b>	
<b>20% Contingency</b>				<b><u>\$58,986</u></b>	
<b>Total Estimate</b>				<b>\$353,916</b>	



**Table 19**  
**Contingent Sediment Remediation Cost Estimate - Alternative 2**

Jeanerette Lumber Shingle Co., LLC v. ConocoPhillips Company, et al.  
Bayou Pigeon Oil Gas Field  
Iberia Parish, Louisiana

<u>Scope Assumptions</u>	<u>Quantity</u>	<u>Units</u>	<u>Basis</u>
<b><u>Sediment Remediation</u></b>			
JLS-2 Area	16,329	square feet	Measured in ArcGIS (Figure 53)
Assumed Depth of Excavation	3	feet	Assumption
Volume of Excavation	1,814	CY	Calculation
Volume of Sediment to Transport	8,709	bbl	Conversion: 4.8 bbl/CY
Weight of Sediment to Transport	1,996	tons	Conversion: 1.1 tons/CY, assumes 70% moisture content
Solidification Agent	100	tons	5% addition for drying
Estimated Production Rate (Excavation)	1,000	bbl/day	Zealous Estimate
Excavation Time Required	9	day	ERM Estimate
Sediment Backfilling Production Rate	500	CY/day	Javeler DP-20
Sediment Backfilling Time Required	4	day	Calculation, assumes 10 hour day

	<u>Unit Cost</u>	<u>Units</u>	<u>Quantity</u>	<u>Cost</u>	<u>Cost Basis</u>
<b><u>Work Plan/Procurement</u></b>					
Coastal Use Permitting	\$5,000	lump sum	1	\$5,000	ERM Estimate
Develop Work Plan	\$5,000	lump sum	1	\$5,000	ERM Estimate
Site walk with contractors, bid tab and review	\$5,000	lump sum	1	\$5,000	ERM Estimate
Meeting with LDNR, finalize Work Plan	\$7,500	lump sum	1	\$7,500	ERM Estimate
<i>Work Plan/Procurement Subtotal</i>				<u>\$22,500</u>	
<b><u>Sediment Remediation</u></b>					
Mobilization/Demobilization	\$20,000	lump sum	1	\$22,000	Zealous Quote
Sediment Remediation Contractor Costs (Dredge, loading, trans)	\$118,000	lump sum	1	\$129,800	Zealous Quote
Solidification Agent Cost	\$153	ton	100	\$16,794	statista.com (\$113/ton purchase, \$40/ton delivery)
Transportation and Disposal Costs (Waste Management, Carlyss)	\$83	ton	2,096	\$191,324	ERM Estimate, Zealous Quote
Construction Oversight (Labor and Expenses, Includes Crew Boat)	\$3,500	day	16	\$56,000	ERM Estimate
Turbidity Curtain Cost	\$827	10' x 50'	6	\$5,457	Paramount Materials Cost
Turbidity Curtain Delivery	\$2,000	truckload	1	\$2,200	ERM Estimate
Turbidity Curtain Placement	\$3,000	lump sum	1	\$3,300	Zealous Quote
Sampling and Analytical (29-B)	\$350	sample	12	\$4,620	ERM Estimate
Sediment Backfilling Mobilization/Demobilization	\$20,000	lump sum	1	\$22,000	Zealous Quote
Sediment Backfilling Contractor Costs	\$12.33	CY	1,814	\$24,608	Goose Point / Point Platte Marsh Creation Project (unit rate adjusted for inflation and tripled because of scale)
Barge Cleaning	\$15,000	lump sum	1	\$16,500	Zealous Quote
Survey Control & Bathymetric Surveys	\$4,000	day	3	\$13,200	ERM Estimate
Health and Safety Compliance	\$5,000	lump sum	1	\$5,000	ERM Estimate
<i>Sediment Remediation Subtotal</i>				<u>\$512,803</u>	
<b><u>Closure Report and LDNR Meeting</u></b>					
Closure Report Preparation and Submittal	\$15,000	lump sum	1	\$15,000	ERM Estimate
Meeting with LDNR plus follow-up	\$7,500	lump sum	1	\$7,500	ERM Estimate
<i>Closure Reporting Subtotal</i>				<u>\$22,500</u>	
<b>Subtotal</b>				<b>\$557,803</b>	
<b>20% Contingency</b>				<b>\$111,561</b>	
<b>Total Estimate</b>				<b>\$669,364</b>	

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