

APPENDIX 9.6

LOUISIANA CIVIL CASE REPORTING
Civil Case Cover Sheet - LA. R.S. 13:4688, Part G, §13 of the Louisiana Supreme Court
General Administrative Rules, and Appendix 9.6 of the Louisiana District Court Rules

This civil case cover sheet shall be completed by counsel for the petitioner, counsel's authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

Suit Caption:

SAVE My Louisiana Inn, et al. vs. State through Hon District Boardman et al.

Court: ~~East Baton Rouge~~ District Docket Number: _____

Parish of Filing: East Baton Rouge Filing Date: 20 Nov. 2025

Name of Lead Petitioner's Attorney: W. ALAN PERRY

Name of Self-Represented Litigant: 0

Number of named petitioners: 8 Number of named defendants: 2

Type of Lawsuit: Please check the categories which most appropriately apply to this suit (no more than 3 categories should be checked):

- Auto: Personal Injury
- Auto: Wrongful Death
- Asbestos: Property Damage
- Product Liability
- Intentional Bodily Injury
- Intentional Wrongful Death
- Business Tort
- Defamation
- Environmental Tort
- Intellectual Property
- Legal Malpractice
- Other Professional Malpractice
- Maritime
- Wrongful Death
- General Negligence
- Auto: Property Damage
- Auto: Uninsured Motorist
- Asbestos: Personal Injury/Death
- Premise Liability
- Intentional Property Damage
- Unfair Business Practice
- Fraud
- Professional Negligence
- Medical Malpractice
- Toxic Tort
- Other Tort (describe below)
- Redhibition
- Class action (nature of case)
DECLARATORY & INJUNCTIVE RELIEF

Please briefly describe the nature of the litigation in one sentence of additional detail:

To Declare EMINENT DOMAIN PROVISION OF R.S. 30:1101 et seq
& BS. 19(2) UNCONSTITUTIONAL against action under those Statute

Following the completion of this form by counsel, counsel's representative, or by the self-represented litigant, this document will be submitted to the Office of the Judicial Administrator, Supreme Court of Louisiana, by the Clerk of Court.

Name, address and contact information of person completing form:
Name W. ALAN PERRY Signature [Signature]

Address 720 Mercury Street Alexandria LA 71301

Phone number: 518-769-2746 E-mail address: wape.snella.tty@gmail.com

SAVE MY LOUISIANA, INC. AND * 19TH JUDICIAL DISTRICT COURT
COLONEL (RET.) MARK T. GUILLORY *
HORACE JOHNSON, JR., LOUIS *
ROBERTSON, PAMELA AND *
BRADFORD BELGARD, REGGIE RJCE, *
AND DAVID K. WOODHAM *
VERSUS * CIVIL ACTION NO. _____
* DIVISION " _____"
STATE OF LOUISIANA, THROUGH * PARISH OF EAST BATON ROUGE
HON. DUSTIN DAVIDSON, *
SECRETARY, LOUISIANA *
DEPARTMENT OF CONSERVATION *
AND ENERGY AND THE STATE OF *
LOUISIANA, THROUGH JEFF LANDRY *
ITS GOVERNOR * STATE OF LOUISIANA

PETITION

NOW INTO COURT, through undersigned counsel, comes Save My Louisiana, Inc., and Colonel (Ret.) Mark T. Guillory, a citizen and resident of Rapides Parish, who represent as follows, to wit:

PARTIES

Plaintiffs 1.

The Plaintiffs herein are:

- (a) Save My Louisiana, Inc. is a Louisiana non-profit corporation domiciled in Rapides Parish, Louisiana, currently operating under the provisions of Section 501(c)(4) of the Internal Revenue Code, appearing herein through its President, Gary L. Musgrove, duly authorized to act herein. Most active affiliates of Save My Louisiana, Inc. ("SML") are property owners living and residing in the parishes of Rapides, Vernon, Allen, and Beauregard within the State of Louisiana. Pertinent provisions of the stated purposes of SML are to protect the environment and natural resources of the State of Louisiana, and to advance and protect the rights of property owners in the State of Louisiana, including the constitutional rights of the people;
- (b) Colonel (Ret.) Mark T. Guillory is a resident of the State of Louisiana, domiciled in Rapides Parish, and is a landowner in that parish; and
- (c) Horace Johnson, Jr., a resident of the State of North Carolina, living and residing at 1536 Kelly Road, Apex, North Carolina 27502, and who owns land situated located at 506 Horace Johnson Road, Pitkin, Louisiana 70656.
- (d) Louis Robertson, a citizen and resident of Allen Parish, Louisiana, living and residing at 2033 Soapstone Road, Pitkin, Louisiana 70656;
- (e) Pamela Ann Belgard and Bradford Joel Belgard, citizens and residents of Rapides Parish, Louisiana, living and residing at 93 Vanasselberg Road, Elmer, Louisiana 71424;

- (f) Reggie Brian Rice, a citizen and resident of Rapides Parish, Louisiana, living and residing at 50 Hodges Road, Lena, Louisiana 71447; and
- (g) David K. Woodham, a citizen and resident of Vernon Parish, Louisiana, living and residing at 266 Brown Bolton Road, Leesville, LA 71446.

STANDING

2.

At issue in this action are certain statutes passed in connection with the State of Louisiana's scheme to participate in carbon capture, transportation, and sequestration activities. Those statutes purport to provide for eminent domain and expropriation of private property for the purposes of pipelines to transport carbon dioxide, and for drilling wells for the purpose of the injection of that carbon dioxide into certain stratigraphic areas below the lands contained within the State of Louisiana. The plan and statutory scheme have resulted in over 33 applications for Class V test well projects, and Class VI injection well projects. A map of the location of certain projects being pursued in central Louisiana is attached hereto and made a part hereof as Exhibit 1. A map of wells with projected areas of impact is attached hereto and made a part hereof as Exhibit 2.

3.

SML has, as its mission, the duty to protect the natural resources and environment of the State of Louisiana, and to protect the constitutional rights of property owners in this state. SML suffered an injury in its own right, based on the passage of statutes providing for the transportation of carbon dioxide through pipelines and the storage of the same in the State of Louisiana, triggering the obligation to take action in regard to the environment and natural resources of the State of Louisiana, and in regard to the constitutional rights of property owners in the State of Louisiana. The current position of its domicile, Rapides Parish, Louisiana, and central Louisiana in general, are a central hub of the carbon sequestration activities in this State. Certain Class V and Class VI wells have already been permitted or are the process of finalizing approval under a permit issued by the State, and many of them are located in Vernon, Rapides, and Allen Parishes. See Exhibit 1.

4.

In addition, SML has standing with regard to its Members and Affiliates, who own immovable property throughout the State of Louisiana, and in the Central Louisiana area. In terms

of Members, Robert Maddox, who owns approximately 400 acres in Rapides Parish, and is located in close proximity to the well permitted near Valentine Lake, and to the “Diamond Vault” well pod. The Diamond Vault site consists of 6 proposed Class VI wells which have been applied for by CLECO. His property is subject to potential eminent domain for both pipeline purposes and well storage purposes, most particularly in the area of “unitization.”

Mike Slocum is a member of SML and a landowner in Rapides Parish, Louisiana. Mike Slocum’s property is located within a few miles of the facility intended to contract for carbon capture and injection of carbon created by its business operations in Rapides Parish. Mike Slocum and his family will be impacted by the carbon dioxide production from the plant, the pipelines used to transport the captured carbon, and potentially the injection wells located at the Diamond Vault well pod, and/or the Draco well pod. Mike Slocum is subject to eminent domain in regard to his property for both pipeline purposes and potential carbon sequestration in Class VI wells nearby.

SML has standing on both direct and representative grounds. See Students for Fair Admissions, Inc. v. President and Fellows of Harv. Coll., 600 U.S. 181 (2023); Louisiana Associated Gen. Contrs. v. State ex rel Div. Of Admin., Office of State Purchasing, 95-CA-2105 (La. 3/8/96), 669 So.2d 1185.

5.

Other members of SML are similarly situated, reside in Rapides Parish, Vernon Parish, and Allen Parish, and potentially subject to eminent domain through direct expropriation or through “unitization.” The location of the wells in the parishes are set forth in Exhibit 1, and Exhibit 3, in globo.

6.

Horace Johnson, Jr. is a citizen and resident of North Carolina. Horace Johnson, Jr. owns land at Horace Johnson Road in Pitkin, Louisiana. Horace Johnson, Jr. was approached by Denbury Carbon Solutions, LLC to lease his property for use in the Draco well pod in Vernon, Allen, and Beauregard Parishes. Horace Johnson, Jr. refused to lease his property for carbon sequestration or pipeline purposes. The persons at Denbury then threatened to expropriate his property or unitize his property involuntarily if he did not lease. Horace Johnson, Jr. nonetheless refused to lease his

property.

7.

Louis Robertson and his spouse are citizens and residents of Allen Parish, Louisiana. Louis Robertson was approached by Denbury Carbon Solutions, LLC, and asked to lease his land for purposes of carbon storage and sequestration and/or pipeline purposes. Louis Robertson was threatened with eminent domain if he did not sign the lease. Louis Robertson signed the lease directly because of the threats of eminent domain, and only after being given insufficient information about the activities, dangers, and effect that the carbon storage would have on his land and its value.

8.

Pamela Ann Belgard and Bradford Joel Belgard (collectively, the “Belgards”), are citizens and residents of, and they own immovable property in Rapides Parish, Louisiana. Their property is situated in close proximity to the Diamond Vault well pod and the Wilcox 2 well pod. The Belgards have been approached to lease their land for purposes of carbon sequestration, infrastructure and/or pipeline usages.

9.

Reggie Brian Rice is a resident of Rapides Parish, Louisiana. Reggie Brian Rice owns his property near Lena, Louisiana, and is in close proximity to the Diamond Vault well pod which is planned by CLECO. Reggie Brian Rice is so close to the Diamond Vault well pod that he fears that he will be expropriated in the near future or “unitized” in the near future.

Defendants

10.

Made defendant herein are:

- (a) Dustin Davidson, in his capacity as the Secretary of the Louisiana Department of Conservation and Energy; and
- (b) Jeff Landry, in his capacity as Governor of the State of Louisiana.

CONSTITUTIONAL PROVISIONS AT PLAY

11.

The preamble to the Louisiana Constitution of 1974, as amended (the “Constitution”), provides as follows:

“PREAMBLE *We, the people of Louisiana*, grateful to Almighty God for the civil, political, economic, and religious liberties we enjoy, *and desiring to protect individual rights to life, liberty, and property*; afford opportunity for the fullest development of the individual; assure equality of rights; promote the health, safety, education, and welfare of the *people*; maintain a representative and orderly government; ensure domestic tranquility; provide for the common defense; and *secure the blessings of freedom and justice to ourselves and our posterity*, do ordain and establish this constitution.”
Emphasis added.

Accordingly, the powers exercised by the state government and the people are powers to provide for, and for the protection of the rights of, the people of Louisiana - exclusively. The constitution is the supreme will of the people of the State of Louisiana, and can only be changed through a valid Constitutional amendment process.

12.

Article I, Section 1 of the Constitution provides that all government “...is instituted to protect the rights of the individual and for the good of the whole. *Its only legitimate ends* are to secure justice for all, preserve peace, *protect the rights*, and promote the happiness and general welfare of the people. *The rights enumerated in this Article are inalienable by the state and shall be preserved inviolate by the state.*” Judges have no more solemn duty than to protect the fundamental rights reserved by the people from government overreach. State v. Spell, 2021-0876 (La. 5/13/22), 339 So.3d 1125. Emphasis added.

13.

Article I, Section 2 of the Louisiana Constitution provides that no person shall be deprived of life liberty or property except by due process of law.

14.

Article I, Section 4 of the Louisiana Constitution provides, in pertinent part, that

“A. Every person has the right to acquire, own, control, use, enjoy, protect, and dispose of private property. This right is subject to

reasonable statutory restrictions and the reasonable exercise of the police power.

B. (1) Property shall not be taken or damaged by the state or its political subdivisions except for *public purposes* and with *just compensation* paid to the owner or into court for his benefit. *Except as specifically authorized by Article VI, Section 21 of this Constitution property shall not be taken or damaged by the state or its political subdivisions: (a) for predominant use by any private person or entity; or (b) for transfer of ownership to any private person or entity.*

(2) As used in Subparagraph (1) of this Paragraph and in Article VI, Section 23 of this Constitution, “*public purpose*” shall be limited to the following:

(a) A general public right to a definite use of the property.

(b) Continuous public ownership of property dedicated to one or more of the following objectives and uses:

(i) Public buildings in which publicly funded services are administered, rendered, or provided.

(ii) Roads, bridges, waterways, access to public waters and lands, and other public transportation, access, and navigational systems available to the general public.

(iii) Drainage, flood control, levees, coastal and navigational protection and reclamation for the benefit of the public generally.

(iv) Parks, convention centers, museums, historical buildings and recreational facilities generally open to the public.

(v) Public utilities for the benefit of the public generally.

(vi) Public ports and public airports to facilitate the transport of goods or persons in domestic or international commerce.

(c) The removal of a threat to public health or safety caused by the existing use or disuse of the property.

(3) *Neither economic development, enhancement of tax revenue, or any incidental benefit to the public shall be considered in determining whether the taking or damaging of property is for a public purpose pursuant to Subparagraph (1) of this Paragraph or Article VI, Section 23 of this Constitution.*

(4) *Property shall not be taken or damaged by any private entity authorized by law to expropriate, except for a public and necessary*

purpose and with just compensation paid to the owner; in such proceedings, whether the purpose is public and necessary shall be a judicial question.

(5) *In every expropriation or action to take property pursuant to the provisions of this Section, a party has the right to trial by jury to determine whether the compensation is just, and the owner shall be compensated to the full extent of his loss. Except as otherwise provided in this Constitution, the full extent of loss shall include, but not be limited to, the appraised value of the property and all costs of relocation, inconvenience, and any other damages actually incurred by the owner because of the expropriation.*
....

Emphasis added.

15.

Article II, Section 1 of the Louisiana Constitution provides that:

“The powers of government of the state are divided into three separate branches: legislative, executive, and judicial.”

Article II, Section 2 of the Louisiana Constitution provides that:

“Except as otherwise provided by this constitution, no one of these branches, nor any person holding office in one of them, shall exercise power belonging to either of the others.”

16.

Article VI, Section 21 of the Louisiana Constitution provides that:

“A. Authorization. — In order to (1) induce and encourage the location of or addition to industrial enterprises therein which would have economic impact upon the area and thereby the state, (2) provide for the establishment and furnishing of such industrial plant, (3) facilitate the operation of public ports, or (4) provide movable or immovable property, or both, for pollution control facilities, *the legislature by law may authorize, subject to restrictions it may impose, any political subdivision, public port commission, or public port, harbor, and terminal district to:*

(a) issue bonds, subject to approval by the State Bond Commission or its successor, and use the funds derived from the sale of the bonds to acquire and improve industrial plant sites and other property necessary to the purposes thereof;

(b) *acquire, through purchase, donation, exchange, and expropriation, and improve industrial plant buildings and industrial plant equipment, machinery, furnishings, and appurtenances, including public port facilities and operations which relate to or facilitate the transportation of goods in domestic and international commerce; and*

(c) sell, lease, lease-purchase, or demolish all or any part of the foregoing.

B. Property Expropriated; Sale to Aliens Prohibited. — *No property expropriated under the authority of this Section shall ever, directly*

or indirectly, be sold or donated to any foreign power, any alien, or any corporation in which the majority of the stock is controlled by any foreign power, alien corporation, or alien.

.....

D. Property excepted. — The bona fide homestead, as defined by Article VII, Section 20(A)(1), *shall not* be subject to expropriation pursuant to this Section.”

Emphasis added.

17.

Article VII, Section 20(A)(1) of the Louisiana Constitution provides that:

“(A) Homeowners. —

(1) The bona fide homestead, consisting of a tract of land or two or more tracts of land even if the land is classified and assessed at use value pursuant to Article VII, Section 18(C) of this constitution, with a residence on one tract and a field with or without timber on it, pasture, or garden on the other tract or tracts, not exceeding one hundred sixty acres, buildings and appurtenances, whether rural or urban, owned and occupied by any person or persons owning the property in indivision, shall be exempt from state, parish, and special ad valorem taxes to the extent of seven thousand five hundred dollars of the assessed valuation. The same homestead exemption shall also fully apply to the primary residence, including a mobile home, which serves as a bona fide home and which is owned and occupied by any person or persons owning the property in indivision, regardless of whether the homeowner owns the land upon which the home or mobile home is sited; however, this homestead exemption shall not apply to the land upon which such primary residence is sited if the homeowner does not own the land.

18.

Article III, Section 12 of the Louisiana Constitution provides:

“A. Prohibitions. — Except as otherwise provided in this constitution, the legislature shall not pass a local or special law:

.....

(7) Creating private corporations, or amending, renewing, extending, or explaining the charters thereof; *granting to any private corporation, association, or individual any special or exclusive right, privilege, or immunity.*”

19.

The 5th and 14th Amendments to the United States Constitution, respectively, provide as follows:

“No person shall be....deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.” and

“All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.”

20.

The 5th Amendment takings clause is made applicable to the states through the 14th Amendment. See Chicago Burlington & Quincy Railroad Co. v. Chicago, 166 U.S. 226 (1897).

21.

The statutes at issue, as discussed below, likewise include an improper delegation of judicial authority to the executive branch of government, in violation of Article II, Sections 1 and 2 of the Louisiana Constitution, and impairs judicial authority under the separation of powers doctrine applied to the United States Constitution.

22.

The statutes at issue, as discussed below, likewise are unconstitutionally vague and overbroad, and should be stricken for that reason.

FACTS AND STATUTES AT PLAY

23.

Prior to 2008, Louisiana law provided that the owner of land owned everything above and below the same “...unless otherwise provided by law...” La. C.C. Art. 490. Article 490 was adopted in 1979, and *it did not change the law*. *Id.*, Comment (a). That article remains in full force and effect. The article is consistent with the protection of the fundamental rights of a citizen of this state in his or her property. The Article is therefore consistent with Constitutional authority and the protections of the rights of Louisiana citizens.

24.

In 2008, Act 315 (H.B. 1117) was passed. It was signed by the Governor on June 2008, and became effective on August 15, 2008. In 2009, Act 517 (La. H.B. 661) was passed and signed by the Governor on July 10, 2009. Act 517 was effective August 15, 2009. In 2020, Act 61 (S.B. 353) was passed. Act 61 was signed by the Governor on June 5, 2020, and became effective on August 1, 2020. In 2021, Act 326 was passed. Act 326 was signed by the Governor on June 14, 2021 and became effective on August 1, 2021. In 2024, Act 620 was passed. Act 620 was signed by the

Governor on June 11, 2024, and became effective on August 1, 2024. In 2024, Act 645 was passed. Act 645 was signed by the Governor on June 11, 2024, and became effective on August 1, 2024.

25.

Each of those acts involve the State’s attempt to legislate a new form of alleged “public purpose” designed to allow the capture of carbon dioxide and other pollutants, and to sequester the same under the lands located in the State of Louisiana. The statutory scheme requires landowners to suffer the invasion of the land, and the injection of a man made pollutant under their land, and to store the same for the operator of the well, the owner of the carbon dioxide, or the government, for an unspecified amount of time.¹ Ultimately, this piece of legislation will offload the long term risk and cost to the taxpayers of Louisiana, with the operators and owners of the carbon dioxide being released from any liability at all, after the operators have been paid to dispose of a waste product that they mostly created. To date, there are over 30 entities which have applied for Class V and Class VI well sites in this state from persons who would, under the Acts listed above, have the power of eminent domain over private citizens’ properties. See Exhibit A. At least one of those entities is an alien corporation or subsidiary of an alien corporation.

26.

The statutes passed and amended in the foregoing acts literally enable the government to act contrary to the only legitimate purpose of government - to protect the rights of men to life, liberty, and *property*. The statutes go so far as to allow foreign alien entities to exercise the power of eminent domain in this state. The statutes subordinate the citizen to the desires of domestic and foreign private persons who act for profit to dispose of waste products created on a national basis, turning this State into a national waste dump site.

27.

The statutes at issue divest the citizens of their Constitutionally guaranteed right to property, subvert procedural and substantive due process of law, and improperly delegate judicial authority to the executive branch of government. The statutes at issue constitute improper takings, without just compensation of law and without public purpose.

¹ This is not the oil and gas law that seeks to remove a pool of oil, or area of natural gas, which is not owned by anyone, and ensure that all landowners receive a portion of the lease and/or market value. This is the State requiring landowners to receive and store a dangerous chemical under their land for private entities and pay for the same through tax credits and subsidies.

28.

The statutes at issue allow for future action at the local level but which would evade certain constitutional protections geared towards local eminent domain powers.

29.

The statutes at issue unconstitutionally provide special privileges and immunities to private corporations as shown below.

30.

That a taking occurs when the government occupies property for its own purposes is not subject to serious question. Cedar Point Nursery v. Hassid, 594 U.S. 139, 148 (2021). In Louisiana, "the intentional or purposeful expropriation or appropriation of private property for a public use or convenience..." constitutes a taking. See Angelle v. State, 212 La. 1069, 34 So.2d 321 (La. 1948). Property is "taken" when the public authority acquires the right of ownership or one of its recognized dismemberments. See Columbia Gulf Transmission v. Hoyt, 215 So.2d 114, 120 (La. 1968). A physical appropriation is a taking, whether permanent or temporary. Compensation is mandated when the government occupies property for its own purposes, even when the use is temporary. Hassid, *supra*, 141 S.Ct. at 2074.

31.

In the case at bar, the legislature has improperly delegated constitutionally protected judicial branch authority to the executive.

32.

La. R.S. 30:1101, et seq., (Act 517 of 2009, as amended and re-enacted), is an act that expresses a non-judicially declared public purpose for carbon storage, and which declared that the any underground cavity or void, whether naturally occurring or man made, is available for storage of carbon dioxide. The act authorizes expropriation of private property by any domestic or foreign corporations or other juridical entities, or a partnership of such corporations, or wholly owned subsidiaries thereof, engaged in the injection of carbon dioxide for the underground storage of carbon dioxide. The act vests sweeping power and control in the Secretary of the Department of Conservation and Energy to regulate lands used in such endeavors. The act is an outright exercise of state power over the lands of private land-owners.

La. R.S. 30:1103 (Act 517 of 2009, as amended and reenacted) makes the following

definitions:

- a. “Carbon dioxide” means naturally occurring, geologically sourced, or *anthropogenically sourced carbon dioxide including its derivatives and all mixtures, combinations, and phases, whether liquid or gaseous, stripped, segregated, or divided from any other fluid stream thereof.*
- b. “Geologic sequestration project” means an injection well or wells used to emplace a carbon dioxide stream beneath the lowermost formation containing an underground source of drinking water or wells used for geologic sequestration of carbon dioxide that have received an expansion to the areal extent of an existing Class II enhanced oil recovery or enhanced gas recovery aquifer exemption and *includes the subsurface three-dimensional extent of the carbon dioxide plume, associated area of elevated pressure, and displaced fluids and the surface area above that delineated region.*
- c. “Geologic storage” means the long- or short-term underground storage of carbon dioxide in a reservoir.
- d. “Interested person” means any person who presently owns an interest within the area of, or proximate to, the tracts directly affected by the storage facility.
- e. “Landowner” means any person who owns the surface and subsurface of land or water bottoms used for geologic storage, injection, or transportation of carbon dioxide who is not the owner or operator of the storage facility or carbon dioxide transmission pipeline or the generator of the carbon dioxide being handled by either the facility or pipeline. The term “landowner” as used in this Chapter does not include the state.
- f. “Person” means any natural person, corporation, association, partnership, limited liability company, or other entity, receiver, tutor, curator, executor, administrator, fiduciary, or representative of any kind.
- g. “Storage facility” means the underground reservoir, carbon dioxide injection wells, monitoring wells, underground equipment, and surface buildings and equipment utilized in the storage operation. The underground reservoir component of the storage facility includes any necessary and reasonable aerial buffer and subsurface monitoring zones designated by the secretary for the purpose of ensuring the safe and efficient operation of the storage facility for the storage of carbon dioxide and shall be chosen to protect against pollution, and escape or migration of carbon dioxide.

La. R.S. 30:1101 et seq specifically authorizes the use of eminent domain for purposes of injection and storage of carbon dioxide in “reservoirs” under the lands of the State of Louisiana.

La. R.S. 19:2(11) (Act 517 of 2009, as amended and reenacted, but originally enacted under a different paragraph number) enabled private persons to expropriate for underground storage of carbon dioxide, and defines, as entities authorized to expropriate property, the following:

“Any domestic or foreign corporation, limited liability company, or other legal entity created for the purpose of, or engaged in, the injection of carbon dioxide for the underground storage of carbon dioxide and that has received a certificate of public convenience and necessity pursuant to the provisions of R.S. 30:1107(A).

Property located in Louisiana may be so expropriated for the underground storage of carbon dioxide in connection with such storage facility projects located in Louisiana, including but not limited to surface and subsurface rights, mineral rights, and other property interests necessary or useful for the purpose of constructing, operating, or modifying a carbon dioxide storage facility. This Paragraph shall not allow for the expropriation of reservoir storage rights for geologic storage of carbon dioxide, except in connection with any project as to which R.S. 30:1108(B)(2) is applicable. This Paragraph shall have no effect on nor does it grant expropriation of the mineral rights or other property rights associated with the approvals required for injection of carbon dioxide into enhanced recovery projects approved by the commissioner under R.S. 30:4.”

35.

La. R.S. 30:1104.2 (Act 645 of 2024, as amended and reenacted) provides that the Secretary shall have the right “...to unitize, pool, and consolidate all separately owned tracts and other property interests within a storage unit for geologic storage.” Said power and authority are declared for the purpose of “...the orderly development of *the state’s geologic storage resources*,² to ensure that these resources are developed in an efficient, fair, and equitable manner, and to prevent waste thereof...”³ Unitization is simply another method of condemnation.

36.

In connection with that power, the Secretary is empowered to ensure that “...just and equitable compensation...” to “...owners in interest who did not consent in writing to geologic storage, except that the order shall not vary, alter, or otherwise apply a standard of benefit sharing or compensation to the terms of any contracts between the storage operator and any owner in interest...” La. R.S. 30:1104.2(C).

² Yet another direct act of control over the lands of private land-owners in this State.

³ This “unitization” theory is a bastardized version of the rights and obligations set forth in the Mineral Code with regard to the extraction of oil and gas. However, the differences are substantive. Oil and gas are not owned by a landowner, and are only owned when reduced to possession under the rule of capture. That statutory scheme regulates oil and gas drilling and is based on a lease system and consensual use of landowner surface rights, and then unitizes based on financial benefit to all landowners only. They are regulating the extraction of energy producing minerals that are owned by no person.

Carbon Sequestration does not fit that model. Carbon sequestration is taking commercial pollution and waste generated in for profit activities and paying the polluter to dispose of his waste under the landowner’s land, and preserving the ownership of the waste to the generator of the waste or his purchaser. The State is forcing a landowner to store pollution for the person who generated it or purchased it. The persons transporting and storing the carbon dioxide have no right to require a non-consenting landowner to use that land as a subterranean warehouse, especially where the product is proven dangerous, taints drinking water supplies, affects growing crops, and causes death when a problem occurs.

37.

La. R.S. 30:1104.2(D) provides for judicial review of the orders of the Secretary, but only after-the-fact, and subject to an administrative appeal specifically invoking the provisions of La. R.S. 30:12. The record and certain determinations will be subject to the administrative proceedings and findings of the Secretary, improperly constraining the judicial branch of government.

38.

Under R.S. 30:1104.2 and on application of a storage operator, the Secretary must/may “...revise, amend, enlarge, reduce, confirm, or dissolve any storage unit provided for under this Section or modify any provision of any order issued pursuant to this Section, without the consent required by Subsection B of this Section. An order enlarging or reducing the areal extent of an existing storage unit shall provide for just and equitable compensation to all owners in interest as to any acreage added to the storage unit and may also provide for adjustments to compensation and the sharing of benefits as are just and equitable for all owners in interest as to the area encompassed by the enlarged or reduced storage unit.” *Yet, no adjustments may be made to existing lease contracts. Only just and equitable compensation is allowed.*

39.

La. R.S. 30:1108 (Act 517 of 2009, as amended and reenacted) purports to authorize private persons to utilize the power of eminent domain in acquiring surface, subsurface, and other property rights for the purpose of constructing, maintaining and operating their private storage business of disposing of or storing man made carbon dioxide created in industrial for-profit ventures. Under the statute on its face, those operators can be foreign, alien persons.⁴

40.

La. R.S. 30:27 (Act 230 of 1997, as amended and reenacted) provides as follows:

“A. When the consent of a property owner has not been otherwise obtained, the issuance of a work order or compliance order by the secretary or his agents shall constitute sufficient authorization for the operator, agents of the operator, or persons acting on behalf of the operator to enter the lands of another person, whether or not such operator or persons hold a valid lease regarding such property, for the purposes of conducting site assessments, site restoration, pit closure, plugging and abandonment operations, or any other matter covered by said work order or compliance order issued under the provisions of Title 30 of the Louisiana Revised Statutes of 1950, or regulations adopted thereunder. The entering of the lands of

⁴ At least one of them is (Shell US Gas and Power, LLC, owned by Shell, a United Kingdom corporation, acting in cooperation with Mitsubishi Corporation, a Japanese corporation, in connection with Origen Power Limited, a United Kingdom corporation), resulting in property being owned by a alien under the eminent domain powers of our state.

another under the provisions of this Section shall be subject to the following:

- (1) The entry shall be limited to areas and times reasonably necessary to perform the operations authorized by this Section.
- (2) Written notice shall be given by the department or operator of a proposed entry to the last record owner of the property at least three calendar days prior to the entry.
- (3) The operations authorized by this Section shall not unreasonably interfere with other activities or improvements upon the property.

B. An entry in accordance with the provisions of this Section shall not constitute a trespass or unauthorized entry for the purposes of imposition of civil or criminal liability.

C. The holder of the work order or compliance order may file an action in a court of competent jurisdiction to obtain an injunction or other appropriate relief in order to comply with the provisions of the work order or compliance order.

D. Failure of the holder of the work order or compliance order to seek relief before a court of competent jurisdiction shall not affect that parties' duties and obligations under said Title 30 or the rules, regulations, and orders of the department, nor shall it constitute a defense to any civil penalty issued due to noncompliance with the orders of the secretary.

E. Nothing herein shall be deemed to alter, create, or affect any contractual rights or other rights including any claim for damages, between any party or parties.

F. No party to whom a work order or compliance order is issued shall be deemed to be a public employee or an agent of the department.

G. The department may promulgate rules and regulations to implement the provisions of this Section.

41.

La. R.S. 1109(D) (Act 517 of 2009, as amended and reenacted) provides as follows:

“D. The secretary or his agents, on proper identification, may enter the land of another for purposes of site assessment or restoration.”

42.

La. R.S. 30:1109(D) purports to authorize the trespass on the lands of the citizens of this State, under the authority of the State, with the decision being delegated to the Secretary of the Department of Conservation and Energy.

CLAIMS

43.

All of the allegations contained in paragraphs 1 through 34 above are incorporated herein by reference.

A. UNCONSTITUTIONAL TAKINGS

44.

The statutory scheme of La. R.S. (19)(2) and R.S. 30:1101, et seq. constitutes a legislative taking of the immovable property of the land-owning citizens of the State of Louisiana. Immediately prior to the passage of those statutes, the caverns and pore spaces under the land were owned by each landowner and not subject to the sweeping regulation.

45.

R.S. 30:1104.2 unconstitutionally vests the determination of whether a project is a “public and necessary purpose” prior to or at the time of the taking in the executive branch of government, in violation of Article I, Section 4 of the Louisiana Constitution. Forced unitization of non-consenting landowners is a taking.

46.

R.S. 30:1104.2 violates Article I, Section 4 of the Louisiana Constitution by vesting the determination of just compensation in the executive branch of government, stripping citizens of their right to a fair jury trial on just compensation, except on an after the fact basis based on an administrative record.

47.

R.S. 30:1104.2 Violates Article I, Section 4 of the Louisiana Constitution and Amendments V and XIV of the United States Constitution by providing a “just and equitable” compensation for the constitutionally required compensation of a land-owner to the full extent of *his* loss paid to or into court for the landowner.

48.

La. R.S. 1104.2 violates Article I, Section 4 of the Louisiana Constitution and Amendments V and XIV of the United States Constitution, on its face, because it provides only for “equitable” compensation to a non-leasing landowner, *which is subject to change*, while other leased persons are not subject to any change in their compensation method. The compensation called for is not constitutionally permissible in measurement or timing, nor does it provide for equal protection of the law to those non-leasing landowners.

49.

La. R.S. 30:27 violates Article I, Section 4 of the Louisiana Constitution and Amendments

V and XIV of the United States Constitution because the statute, on its face, fails to provide for a judicial determination of a public and necessary purpose, and it utterly fails to provide for just compensation paid at the time of the taking or into court for the benefit of the landowner.

50.

La. R.S. 30:1109(D) violates Article I, Section 4 of the Louisiana Constitution and Amendments V and XIV of the United States Constitution because the statute, on its face, provides for no judicial determination of a public and necessary purpose, nor does it provide for just compensation to be determined by a jury trial.

51.

The statutory scheme does not provide just compensation, as contemplated by the Louisiana Constitution or the United States Constitution, to landowners, nor does it provide any such compensation prior to or at the time of the taking.⁵

52.

La. R.S. 19:2(11), R.S. 30:27, R.S. 30:1104, R.S. 30:1104.2, R.S. 30:1108, and R.S. 30:1109, all violate Article I, Section 4 of the Louisiana Constitution because, on their face, they provide for the taking of private property for the sole purpose of the storage of carbon dioxide owned by a third person preserving the ownership of that gas unto that third person.

53.

La. R.S. 19:2(11), R.S. 30:27, R.S. 30:1104, R.S. 30:1104.2, R.S. 30:1108, and R.S. 30:1109 all violate Article I, Section 4 of the Louisiana Constitution because, on their face, they purport to authorize eminent domain for a purpose that falls outside of the purposes enumerated in Article I, Section 4(B).

B. UNCONSTITUTIONAL DELEGATION OF AUTHORITY

54.

La. R.S. 30:1104.2 violates Article II, Sections 1 and 2 of the Louisiana Constitution because it purports to be a delegation of authority by the legislative branch of government to the Secretary of the Department of Conservation and Energy, an executive branch of government, of the authority to regulate takings and the compensation therefor, which is constitutionally vested in the judicial branch of government by Article I, Section 4 of the Louisiana Constitution.

⁵ No provisions of a “quick taking” are allowed for the carbon sequestration act.

55.

R.S. 30:1104.2 violates Article II, Sections 1 and 2, because the statute, on its face, constitutes a purported legislative delegation to the executive branch of government of a determination of whether a project is a “public and necessary purpose” prior to or at the time of the taking, which is secured to the judicial branch of government by Article I, Section 4 of the Louisiana Constitution.

56.

R.S. 30:1104.2 unconstitutionally vests the determination of just compensation in the executive branch of government, stripping citizens of their right to a fair jury trial on just compensation, in violation of Article II, Sections 1 and 2 and Article I, Section 4 of the Louisiana Constitution.

57.

La. R.S. 30:1104.2 likewise unconstitutionally delegates the alleged compensation claims of un-leased landowners to be fixed by the Secretary of the Department of Conservation and Energy and private industry, in violation of Article II, Sections 1 and 2, and Article I, Section 4 of the Louisiana Constitution which reserves the issue for a judicial determination.

58.

La. R.S. 30:1109(D) constitutes an unconstitutional delegation of authority by the legislature, from the judicial branch of government to the executive branch, with regard to the determination of a public and necessary purpose and in regard to just compensation.

59.

La. R.S. 30:27 constitutes an unconstitutional delegation of authority by the legislature, from the judicial branch of government to the executive branch of government, with regard to the determination of a public and necessary purpose and in regard to just compensation.

C. DUE PROCESS VIOLATIONS

60.

La. R.S. 1104 and R.S. 1108 violate Article 1, Section 2, and/or Article 1, Section 4 of the Louisiana Constitution. They do not provide any sort of due process before the taking, they do not provide for constitutionally protected payment for the takings, and in some cases they do not provide for any sort of compensation at all. Those statutes require a landowner to store noxious gases under

the landowner's property for the benefit of a third person who owns the gases. They likewise violate the procedural and substantive due process provisions and just compensation provisions of Amendments V and XIV of the United States Constitution for the same reasons.

61.

Further, those statutes act without a judicial determination of a public and necessary purpose, without payment of just compensation as contemplated by Article 1, Section 4, of the Louisiana Constitution and in violation of the procedural and substantive due process rights of citizens under Article 1, Section 2, and Article 1, Section 4 of the Louisiana Constitution. The statutes are in violation of Amendments V and XIV of the United States Constitution.

62.

The provisions of La. R.S. 30:1104.2 et seq., are unconstitutional because they fail to honor the constitutional guarantees of due process, both procedural and substantive. See Article 1, Section 2 and Article 1, Section 4 of the Louisiana Constitution; Amendments V and XIV of the United States Constitution.

63.

La. R.S. 30:27 constitutes an unconstitutional statute because it provides no protections for procedural due process or substantive due process to the citizens of the State of Louisiana. See Article 1, Section 2 and Article 1, Section 4 of the Louisiana Constitution; Amendments V and XIV of the United States Constitution.

64.

La. R.S. 1109(D) constitutes an unconstitutional statute because it provides no protections for procedural due process or substantive due process to the citizens of the State of Louisiana. See Article 1, Section 2 and Article 1, Section 4 of the Louisiana Constitution; Amendments V and XIV of the United States Constitution.

**D. VIOLATIONS OF ARTICLE III, SECTION 12,
OF THE LOUISIANA CONSTITUTION**

65.

La. R.S. 1104, 1104.2, 1109(B) are likewise unconstitutional because they violate Article I, Section 3 and Article III, Section 12(A)(7) of the Louisiana Constitution and Amendments V and XIV of the United States Constitution by :

* by limiting liability for damages for that special class of corporations; R.S. 1109(B);

* by ultimately releasing an operator from liability on the well, and having the State take its place, at the cost of the taxpayer; R.S. 30:1109(A);

* by allowing third persons to store dangerous substances under a person's land as part of the third person's business model while retaining ownership, for use or delivery to third persons, without the landowner's consent; R.S. 1104(E), 1104.2.

Each of those special privileges and immunities are improperly granted solely to carbon storage operators as defined in the statutory scheme.

66.

La. R.S: 30:1108 unconstitutionally delegates to private industry the ability to condemn private property under the imminent domain power of the State in violation of Article III, Section 12(A)(7), which is a special privilege provided to a "corporation."

WHEREFORE, Petitioners request the following relief:

- a. a declaration that the statutes at issue and cited herein, or the offending provisions thereof, are unconstitutional, void, and of no effect, as described above;
- b. an injunction against the Department of Conservation and Energy, Justin Davidson in his official capacity as Secretary of the Department of Conservation and Energy, and against the State of Louisiana and its Governor, Jeff Landry in his official capacity, restraining, enjoining, and prohibiting them or any of their agents, employees, officers, contractors, or other persons acting on their behalf or on behalf of their offices, from further implementation or enforcement of La. R.S. 30:1101, et seq., or the specific offending provisions thereof, including authorizing or enacting any administrative rules or regulations pursuant to these statutes, holding any hearings pursuant to these statutes, or issuing any decisions on any pending applications pursuant to these statutes;
- c. enjoining the State of Louisiana, its Governor Jeff Landry, in his official capacity, and its Secretary of the Department of Conservation and Energy, Justin Davidson in his official capacity, from enforcing or implementing any of those statutes or offending portions thereof, with regard to any Class V or Class VI well permits that may have already been submitted or approved;
- d. For all such other relief that may be available by law or equity in the premises, and for all orders and decrees necessary and appropriate, together with all costs of these proceedings and attorneys fees as allowed by law.

Respectfully submitted,

ALAN PESNELL LAWYER LLC

BY:



W. ALAN PESNELL
720 Murray Street
Alexandria, LA 71301
Telephone: (318) 704-0979
Facsimile: (318) 625-0604
Bar Roll #23249
wapesnellatty@gmail.com

Please Serve:

Hon. Dustin Davidson, Secretary
Louisiana Department of Conservation and Energy
617 N. Third Street, Suite A
Baton Rouge, LA 70802 And

Hon. Jeff Landry, Governor
1001 Capitol Access Road
Baton Rouge, Louisiana 70802 And

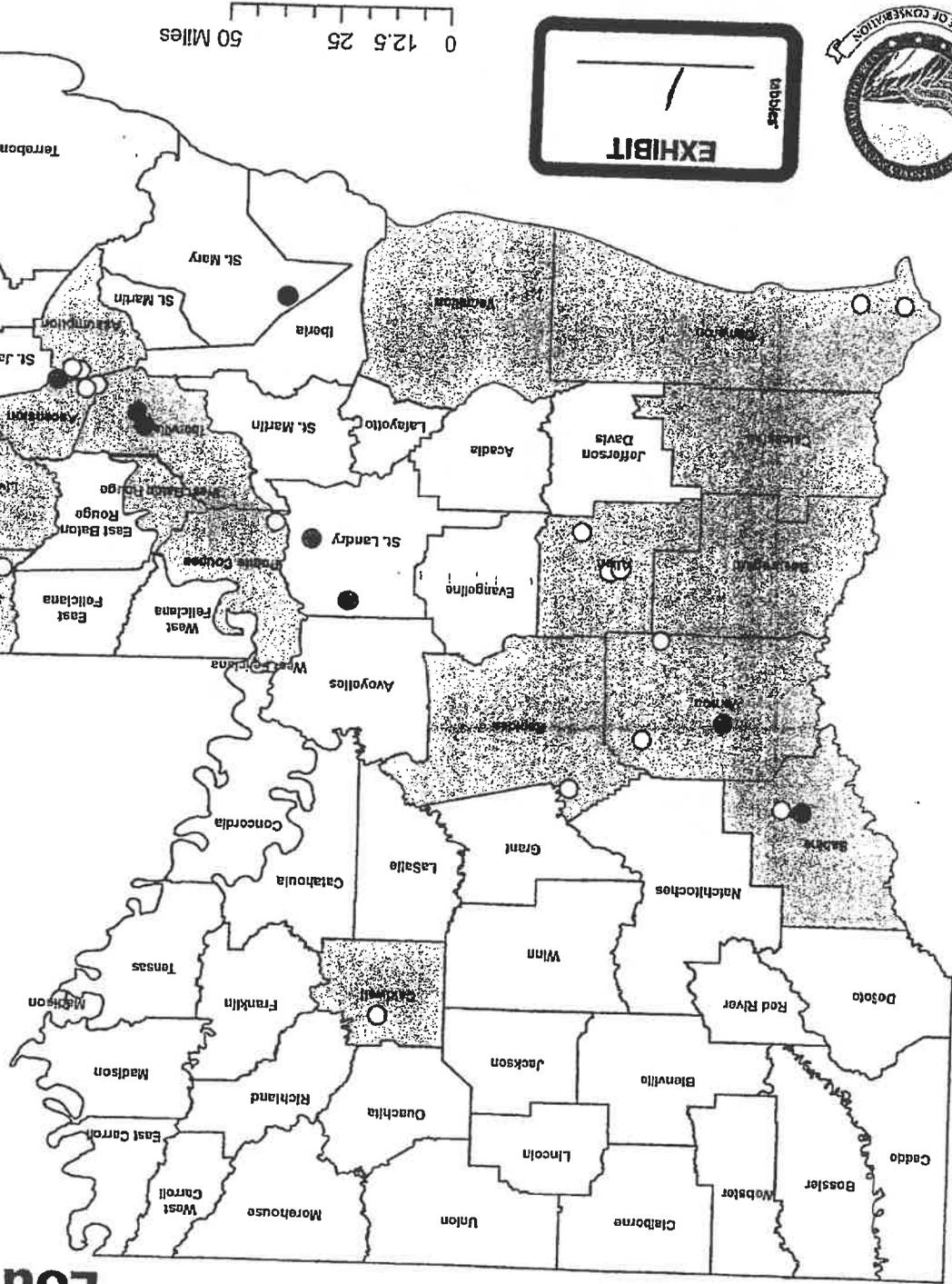
Hon. Liz Murrill, Attorney General
1885 North Third Street
Baton Rouge, Louisiana 70802

Louisiana Class V and Class VI Project Locations

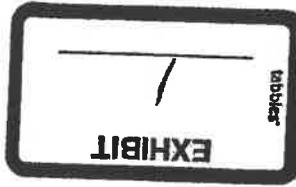
(EAST BATON ROUGE PARISH C-770744
 Filed Nov 20, 2025 10:00 AM
 Deputy Clerk of Court

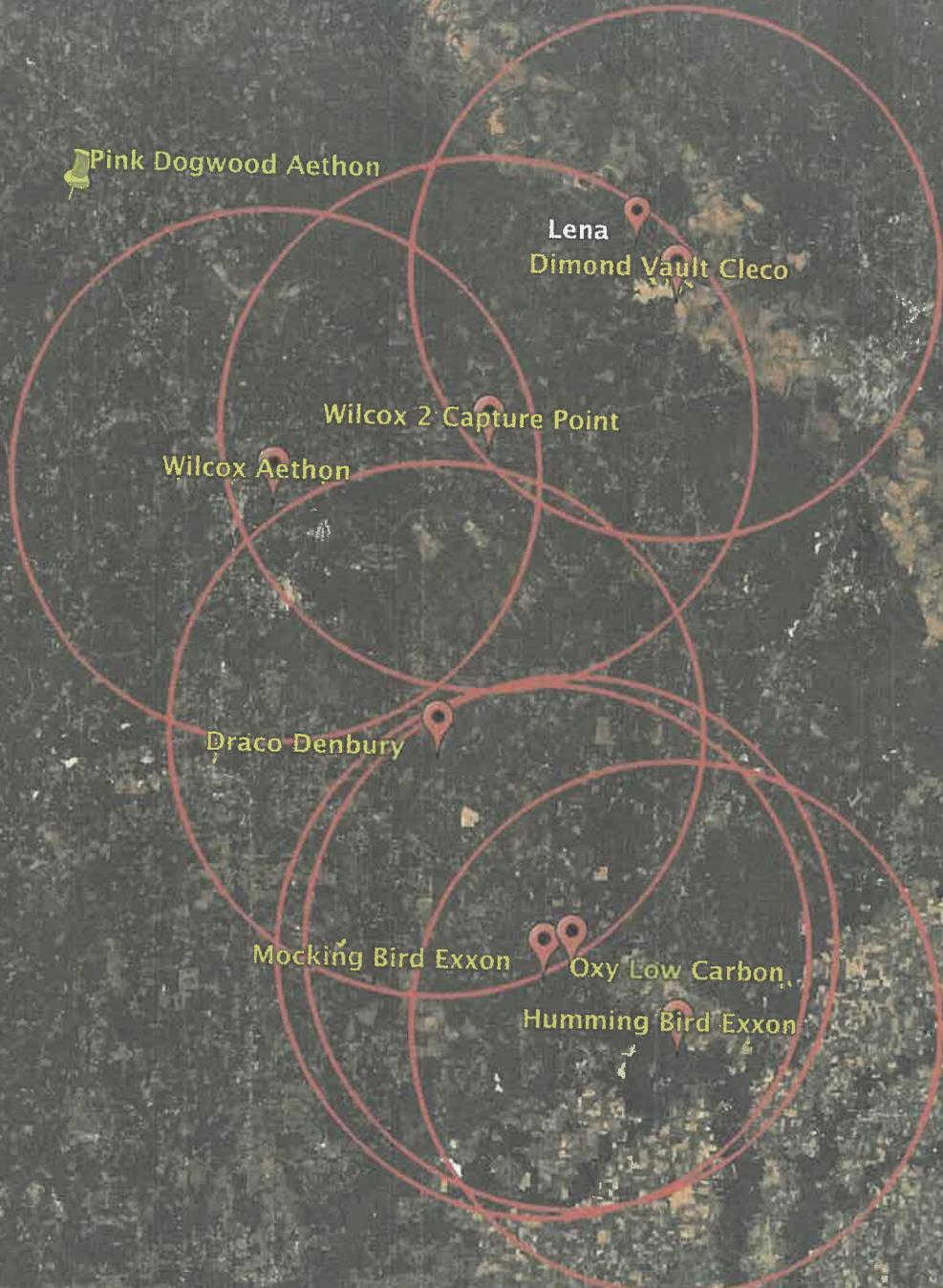
Legend

- Status**
- Permitted - Class V
 - Under Review - Class V
 - Under Review - Class VI
 - Strategic Test Well
 - Strategic Test Well
 - ▨ Parish with Proposed Class VI Project



Esri, HERE, Garmin, USGS, EPA, NPS





33.5 mi

Image Landsat / Copernicus

EXHIBIT
tabbles
2

Google

Imagery Date: 12/31/2020 21826101 0711 N 0001100 0000

State of Louisiana with Parishes

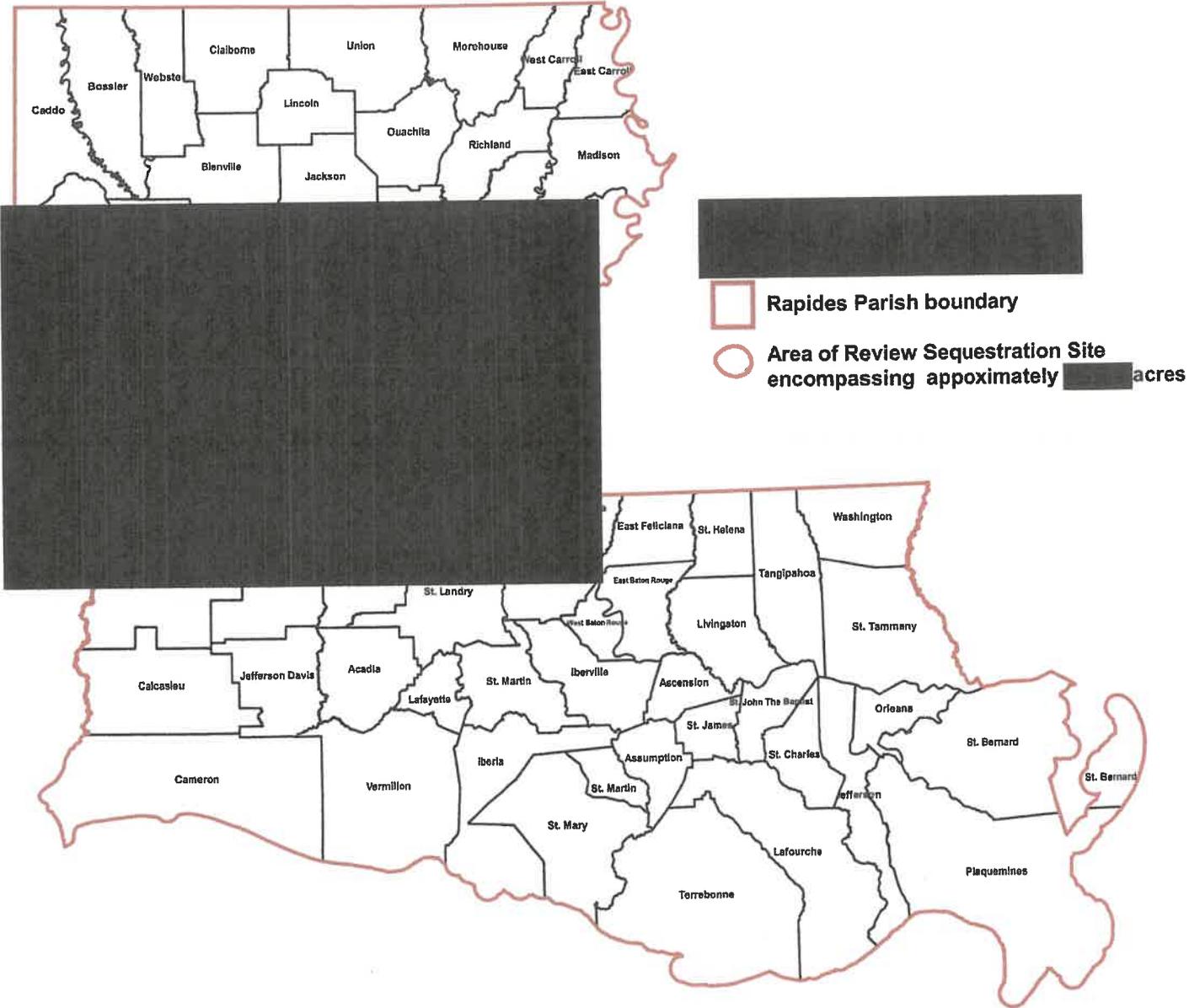


EXHIBIT
3
20 Parishes in State

Capturepoint Solutions

Figure 2-21 Location of Sequestration Site [redacted]
THIS DOCUMENT CONTAINS PROPRIETARY BUSINESS INFORMATION (PBI)



C. H. Fenstermaker & Associates, L.L.C.
136 Regency Sq.
Lafayette, LA 70508
Ph. 337-287-2200
Fax. 337-282-8239

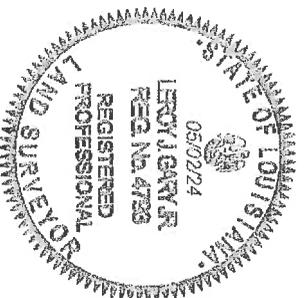
REVISIONS

DRAWN BY: AJF
DATE: 09/02/24
JOB#: 224746.00

PROJ. INGR.: DSM

SHEET 1 OF 1

Leroy J. Gentry Jr.
Leroy J. Gentry, Jr.
Professional Land Surveyor
Registration No. 4793



SURFACE USE PLAT
CENLA DEVELOPMENT
CAPTUREPOINT LLC

T:\2024\2247480\DWG\C02 INJECTORS 7.8 DETAIL.dwg



C. H. Fenstermaker
& Associates, L.L.C.
135 Regency Sq.
Lafayette, LA 70508
Ph. 337-237-2200
Fax. 337-232-3299

REVISIONS

DRAWN BY: ADF	PROJ. MGR.: DBM
DATE: 03/14/2024	
JOB#: 2247480.00C	SHEET 1 OF 1

*Not to be used for construction,
bidding, recordation, conveyance,
sales, or engineering design.*

PRELIMINARY

Danielle B. McMath
Professional Land Surveyor
Registration No. 5297

DETAIL

CAPTUREPOINT, LLC
PROPOSED PAD
SITUATED IN



C. H. Enstemaker & Associates, L.L.C.
135 Regency Sq.
Lafayette, LA 70508
Ph. 337-237-2200
Fax. 337-232-3293

REVISIONS

DRAWN BY: ADE PROJ. MGR.: DSM
DATE: 05/02/24
JOB#: 2247480-00 SHEET: 1 OF 1

Leroy J. Gary, Jr.
Leroy J. Gary, Jr.
Professional Land Surveyor
Registration No. 4793



SURFACE USE PLAT
CENLA DEVELOPMENT
CAPTUREPOINT LLC



C. F. Fenstermaker
& Associates, L.L.C.
135 Regency Sq.
Lafayette, LA 70508
Ph. 337-237-2200
Fax. 337-232-3299

REVISIONS

DRAWN BY: A F PROJ. MGR.: DEM
DATE: 05/02/24
JOB#: 224748-00 SHEET : OF 1



Leroy J. Gary, Jr.
Leroy J. Gary, Jr.
Professional Land Surveyor
Registration No. 4793

SURFACE USE PLAT
CENLA DEVELOPMENT
CAPTUREPOINT LLC



OFFICE OF CONSERVATION 04-53118
UIC-25 Stratigraphic Test
CLASS-V WELL PERMIT APPLICATION
 INJECTION & MINING DIVISION

1. APPLICATION TYPE: (Check One) <input checked="" type="checkbox"/> DRILL AND COMPLETE NEW CLASS-V WELL <input type="checkbox"/> CONVERT AN EXISTING WELL TO CLASS-V <input type="checkbox"/> OTHER (SPECIFY):	LOUISIANA DEPARTMENT OF NATURAL RESOURCES - OFFICE OF CONSERVATION INJECTION & MINING DIVISION Injection-Mining@la.gov (225) 342-5515
2. IDENTIFY WELL USE Drill a stratigraphic test well to acquire site specific data and validate properties of a storage complex to meet requirements of UIC Class VI Site Characterization for the Draco Storage Facility Carbon Sequestration Project.	4. OC OPERATOR CODE D10126
3. OWNER OPERATOR NAME DENBURY CARBON SOLUTIONS, LLC	6. CITY, STATE, ZIP CODE PLANO, TX 75024
5. OWNER OPERATOR MAILING ADDRESS 5851 LEACY CIRCLE SUITE 1100	8. E-MAIL ADDRESS Cody.Todd@denbury.com
7. TELEPHONE NO 972-673-1238	10. WELL NO 1
9. WELL NAME DRACO ZM	11. WELL SERIAL NO (Well Conversions Only)
12. FIELD NAME (if known) WILCOA -SO LA LAFAYETTE DISTRICT	13. FIELD CODE (if known) 9727
14. PARISH NAME VERNON (58)	15. SECTION 8
18. LOUISIANA COORDINATE ZONE (Check One) <input checked="" type="checkbox"/> NORTH ZONE <input type="checkbox"/> SOUTH ZONE	16. TOWNSHIP 2S
19. LATITUDE (NORTH) NAD 1927 30°54'11.51	17. RANGE 6W
20. LONGITUDE (WEST) NAD 1927 93°00'36.32	21. LOUISIANA LAMBERT (X-Y) COORDINATES (NAD 1927) X: 1,839,997 Y: 86,417
22. LATITUDE (NORTH) NAD 1983 30°54'12.18	24. LOUISIANA LAMBERT (X-Y) COORDINATES (NAD 1983) X: 3,120,784 Y: 147,119
25. LIST PERMITS, LICENSES, OR APPROVALS THE APPLICANT HAS RECEIVED OR APPLIED FOR WHICH SPECIFICALLY AFFECT THE APPLICANT'S LEGAL OR TECHNICAL ABILITY TO CARRY OUT THE PROPOSED ACTIVITY. INCLUDE IDENTIFICATION NUMBER OF APPLICATIONS OR, IF ISSUED, THE IDENTIFICATION NUMBER OF THE PERMIT, LICENSE, OR OTHER APPROVALS.	
CORPS OF ENGINEERS	Permits, Licenses, Construction, Project Approval Identification NATIONWIDE PERMIT 14 - File # MVN-2022-00957-CG

OFFICE OF CONSERVATION

044308

26. WELL CASING / CEMENT DATA		CASING/LINER SETTING DEPTHS		SACKS CEMENT	TYPE CEMENT/ YIELD (#/sack)	CEMENT TOP (feet)
HOLE SIZE (inches)	CASING SIZE (OD - inches)	CASING WEIGHT (lb/ft)	CASING GRADE	TOP (feet)	BOTTOM (feet)	
20	20	94	H-40		MINING DIVISION	
17 1/2"	13 3/8"	54.5	J-55	0	4,916	3,220/590 A + additives(1,902/1,179)
12 1/4"	9 5/8"	47	L-80	0	7,736	1,565/272 A++ additives(1,714/1,444)
8 1/2"	5 1/2"	23	22C125	7,436	11,616	1,295 CO2 Res. (1,204) 7,436
27. BASE FUSDW 3,700		28. WELL TOTAL DEPTH 11,616	29. WELL PLUGBACK DEPTH 11,596	30. TUBING SIZE & DEPTH 3 1/2" @ 10,873		31. PACKER SIZE & DEPTH 10,863
32. INJECTION ZONE DEPTHS (if applicable) 33. COMPLETION/PERFORATION DEPTHS (if applicable)		Top: ~10,913 Bottom: ~11,113		34. WELL COMPLETION (Check One) <input type="checkbox"/> OPEN HOLE <input checked="" type="checkbox"/> PERFORATIONS <input type="checkbox"/> SCREEN		
INJECTIVE TEST INFORMATION (if applicable)						
35. TEST MATERIAL (e.g. nitrogen, brine, etc): Freshwater from water source well ***CO2 is prohibited as a Class V test material***		36. MAXIMUM TEST PRESSURE (psi): 2,800 psi		37. TOTAL INJECTION VOLUME: 3,300 bbbls		
38. Is the well Located on Indian Lands or Other Lands Owned by or under the Jurisdiction or Protection of the Federal Government?		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		39. Is the well Located on State Water Bottoms or Other Lands Owned by or under the Jurisdiction or Protection of the State of Louisiana?		
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				
40. AGENT OR CONTACT AUTHORIZED TO ACT ON BEHALF OF THE APPLICANT DURING THE PROCESSING OF THIS APPLICATION						
NAME: Cody Todd, P.E.						
MAILING ADDRESS: 5851 Legacy Circle, Suite 1200						
CITY, STATE, ZIP CODE: Plano, TX, 75024						
TELEPHONE NUMBER: 972-673-2238 FAX NUMBER:						
E-MAIL ADDRESS: Cody.Todd@denbury.com						
41. CERTIFICATION BY WELL OWNER/OPERATOR						
I certify that as the owner/operator of the injection well, the person identified in Item No. 40 above is authorized to act on my behalf during the processing of this application, to submit additional information as requested, and to give oral statements in support of this application. I will grant an authorized agent of the Office of Conservation entry onto the property to inspect the injection well and related appurtenances as per LSA-R.S. 30:4. I agree to operate the well in accordance with Office of Conservation guidelines. I further certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment or both (LSA-R.S. 30:17).						
Print Name of Well Owner/Operator Denbury Carbon Solutions, LLC			Print Title of Company Official (as applicable) VP of RSE			
Signed by Well Owner/Operator <i>Cody Todd</i>			Date 06/27/23			



045314

CLASS V STRAT TEST WELL PERMIT APPLICATION
 OFFICE OF CONSERVATION
 INJECTION & MINING DIVISION
 617 N. Third St., 9th FLOOR
 BATON ROUGE, LA 70802

Injection-Mining@la.gov
 (225) 342-5515

UIC-25 STRAT TEST

PLEASE READ APPLICATION INSTRUCTIONS

TYPE ONLY

1. APPLICATION TYPE: (Check One) <input checked="" type="checkbox"/> DRILL AND COMPLETE NEW CLASS V WELL <input type="checkbox"/> CONVERT AN EXISTING WELL TO CLASS V <input type="checkbox"/> OTHER (SPECIFY):	
2. IDENTIFY WELL USE Drill a stratigraphic test well to evaluate the feasibility of a potential carbon storage project	
3. IDENTIFY FUTURE WELL USE (i.e. Conversion to Class VI, monitor well, P&A, etc.) Monitor Well	
4. OWNER/OPERATOR NAME ExxonMobil Low Carbon Solutions Onshore	
5. OC OPERATOR CODE E1041	
6. OWNER/OPERATOR MAILING ADDRESS 2277 Springwoods Village Parkway Spring, TX 77389	
7. CITY, STATE, ZIP CODE	
8. TELEPHONE NO 346-220-7391	
9. E-MAIL ADDRESS cody.todd@exxonmobil.com	
10. WELL NAME Mockingbird IZM	
11. WELL NO 1	
12. WELL SERIAL NO (Well Conversions Only)	
13. FIELD NAME Wildcat - So LA Lafayette District	
14. FIELD CODE 9727	
15. PARISH NAME Allier Parish (02)	
16. SECTION 34	
17. TOWNSHIP 4S	
18. RANGE 5W	
19. LOCATION COORDINATES (GCS, NAD 27) 20. STATE PLANE COORDINATES (LAMBERT, NAD 27) LATITUDE: 30° 39 MIN 53.27 SEC <input type="checkbox"/> NORTH ZONE <input checked="" type="checkbox"/> SOUTH ZONE LONGITUDE: 92° 52 MIN 04.34 SEC X: 1,517,511.81 Y: 729,859.24	
21. LEGAL LOCATION DESCRIPTION (FROM LOCATION PLAT): Surface location being 2006' from the North Line and 2317' from the West Line of Section 34, located in Section 34, T4S-R5W, Allier Parish, Louisiana.	
OFFICE OF CONSERVATION	

UIC-2 STRAT TEST

INJECTION AND MINING DIVISION

045314

22. LIST PERMITS, LICENSES, OR APPROVALS THE APPLICANT HAS RECEIVED OR APPLIED FOR WHICH SPECIFICALLY AFFECT THE APPLICANT'S LEGAL OR TECHNICAL ABILITY TO CARRY OUT THE PROPOSED ACTIVITY. INCLUDE IDENTIFICATION NUMBER OF APPLICATIONS OR, IF ISSUED, THE IDENTIFICATION NUMBER OF THE PERMIT, LICENSE, OR OTHER APPROVALS.

Regulatory Program or Agency		Permits, Licenses, Construction, Project Approval Identification	

23. WELL CASING / CEMENT DATA

Casing Size (OD - Inches)	Hole Diameter (Inches)	Casing Weight (lb/ft)	Casing Grade	Casing Setting Depths		Total Sacks	Sacks Cement (Lead/Tail)	Type (Lead/Tail)	Yield (cu ft/sack) (Lead/Tail)	Cement Top
				Top	Bottom					
20	26	79	X42	0	100	225	225	A	1.55	surface
9 7/8	12 1/4	47	L-80	0	3,290	1,270	986/284	A/A	1.92/1.17	Surface
5 1/2	8 1/2	17	L-80	0	3,645	See last line	See last line	See last line	See last line	See last line
5 1/2	8 1/2	23	22Cr125	3,645	7,280	See last line	See last line	See last line	See last line	See last line
5 1/2	8 1/2	17	L-80	7,280	7,480	1,354	574/780	A/CO2 COMP.	1.76/1.69	Surface

24. BASE OF USDW (FT): 2,788
 ALL WELL DEPTHS SHOULD BE GIVEN IN MD

REFERENCE E-LOG (SERIAL NUMBER): 252477

25. HEIGHT OF KB FOR PROPOSED WELL (FT): 32.5
 26. ELEVATION OF GL FOR PROPOSED WELL (FT): 84
 27. WELL TOTAL DEPTH (FT): 7,480
 28. PLUGBACK DEPTH (FT): 4,950
 29. TUBING SIZE & DEPTH: NA
 30. PACKER SIZE & DEPTH: NA

INJECTIVITY TEST INFORMATION (IF APPLICABLE)

31. INJECTION ZONE DEPTHS
 Top: 1,045 Bottom: 7,280
 32. COMPLETION/PERFORATION DEPTHS
 Top: 4,980 Bottom: 6,290

33. WELL COMPLETION OPEN HOLE PERFORATIONS SCREEN

34. TEST MATERIAL (e.g. nitrogen, brine, etc): Brine
 35. MAXIMUM TEST PRESSURE (psi): 4,500
 36. TOTAL INJECTION VOLUME (bbbls): 15,000
 Cr2 is prohibited as a Class V test material

37. Is the Well Located on Indian Lands or Other Lands Owned by or under the Jurisdiction or Protection of the Federal Government? YES NO

38. Is the Well Located on State Water Bottoms or Other Lands Owned by or under the Jurisdiction or Protection of the State of Louisiana? YES NO

39. If the proposed well is associated with a potential Class V geologic sequestration project, does the applicant own the mineral rights at the proposed well location? YES NO

40. If no, has written notification been provided to the mineral owner(s)? YES NO

OFFICE OF CONSERVATION

OFFICE OF CONSERVATION

OCT 23 2024

INJECTION & MINING DIVISION

UIC-25 STRAT TEST

INJECTION & MINING DIVISION

045314

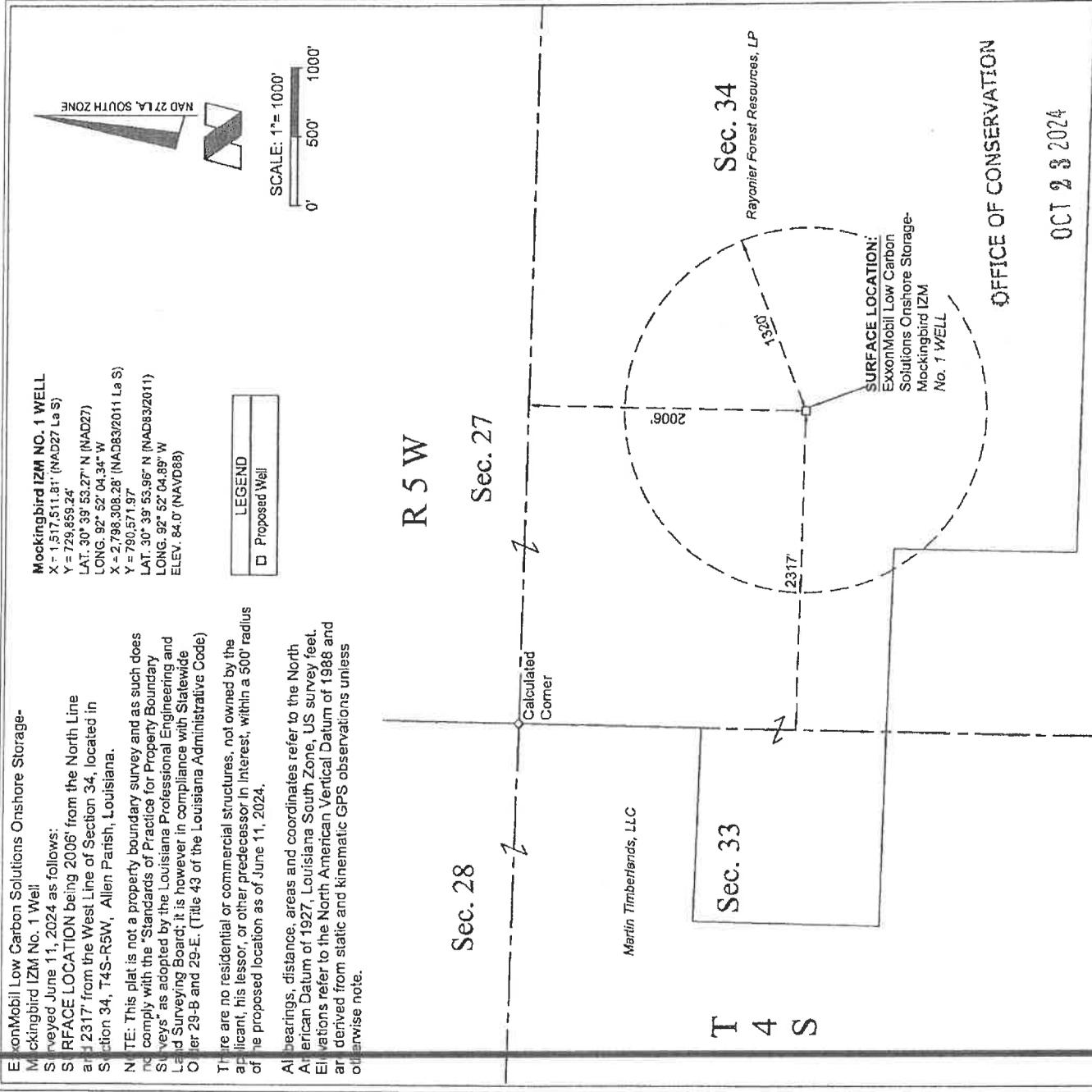
41. AGENT OR CONTACT AUTHORIZED TO ACT ON BEHALF OF THE APPLICANT DURING THE PROCESSING OF THIS APPLICATION	
NAME: Cody Todd, P.E.	
COMPANY: ExxonMobil Low Carbon Solutions Onshore	
MAILING ADDRESS: 22777 Springwoods Village Parkway, Spring, TX 77389	
TELEPHONE NUMBER: 346-220-7391	
E-MAIL ADDRESS: cody.todd@exxonmobil.com	
42. CERTIFICATION BY WELL OWNER/OPERATOR	
I certify that as the owner/operator of the injection well, the person identified in Item No. 37 above is authorized to act on my behalf during the processing of this application, to submit additional information as requested, and to give oral statements in support of this application. I will grant an authorized agent of the Office of Conservation entry onto the property to inspect the injection well and related appurtenances as per LSA-R.S. 30:4. I agree to operate the well in accordance with Office of Conservation guidelines. I further certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines or imprisonment or both (LSA-R.S. 30:17).	
Print Name of Well Owner/Operator Exxon Low Carbon Solutions Onshore	Print Title of Company Official (as applicable) Bruce Chalton - CCS Development Manager
Signature of Well Owner/Operator 	Date 10/22/2024

OFFICE OF CONSERVATION

OCT 28 2024

INJECTION & MINING DIVISION

065314



ExxonMobil Low Carbon Solutions Onshore Storage-
 Mockingbird IZM No. 1 Well
 Surveyed June 11, 2024 as follows:
SURFACE LOCATION being 2006' from the North Line
 and 2317' from the West Line of Section 34, located in
 Section 34, T4S-R5W, Allen Parish, Louisiana.

NOTE: This plat is not a property boundary survey and as such does
 not comply with the "Standards of Practice for Property Boundary
 Surveys" as adopted by the Louisiana Professional Engineering and
 Land Surveying Board; it is however in compliance with Statewide
 Order 29-B and 29-E. (Title 43 of the Louisiana Administrative Code)

There are no residential or commercial structures, not owned by the
 applicant, his lessor, or other predecessor in interest, within a 500' radius
 of the proposed location as of June 11, 2024.

All bearings, distance, areas and coordinates refer to the North
 American Datum of 1927, Louisiana South Zone, US survey feet.
 Elevations refer to the North American Vertical Datum of 1988 and
 are derived from static and kinematic GPS observations unless
 otherwise note.

FOR THE EXCLUSIVE USE OF
 EXXONMOBIL LOW CARBON SOLUTIONS
 ONSHORE STORAGE

I, Danielle B. McMath, Professional Land
 Surveyor, certify that the well location
 depicted and described in this plat
 was staked and surveyed in the field by me
 or under my direction with accuracy and
 precision to the nearest foot. I have properly
 examined this plat and have determined
 that it complies with existing local
 Louisiana codes, and has been properly
 adapted to use in this area.

C. H. Fenstermaker
 & Associates, L.L.C.
 136 Regency Sq.
 Lafayette, LA 70503
 Ph. 337-237-2399
 Fax. 337-237-2399



06/19/2024
DANIELLE B. MCMATH
 License No. 5297
 PROFESSIONAL
 LAND SURVEYOR

Danielle B. McMath
 Registration No. 5297

DRAWN BY: DBM PROJ. MGR.: DBM
 DATE: 06/18/2024
 JOB: 2247745.00C SHEET 1 OF 1

INJECTION & MINING DIVISION

WELL LOCATION PLAT
MOCKINGBIRD IZM
NO. 1 WELL

EXXONMOBIL LOW CARBON
SOLUTIONS ONSHORE STORAGE
 SITUATED IN
 SECTION 34, T4S-R5W
 ALLEN PARISH, LOUISIANA

OCT 23 2024

047464



CLASS V STRAT TEST WELL PERMIT APPLICATION

OFFICE OF CONSERVATION
 INJECTION & MINING DIVISION
 617 N. Third St., 9th FLOOR
 BATON ROUGE, LA 70802

Injection-Mining@la.gov
 (225) 342-5515

UIC-25 STRAT TEST PLEASE READ APPLICATION INSTRUCTIONS **TYPE ONLY**

1. APPLICATION TYPE: (Check One)	
<input checked="" type="checkbox"/> DRILL AND COMPLETE NEW CLASS V WELL	<input type="checkbox"/> CONVERT AN EXISTING WELL TO CLASS V
<input type="checkbox"/> OTHER (SPECIFY):	
2. IDENTIFY WELL USE	
Drill a stratigraphic test well to evaluate the feasibility of a potential carbon storage project	
3. IDENTIFY FUTURE WELL USE (i.e. Conversion to Class VI, monitor well, P&A, etc.)	
Monitor Well	
4. OWNER/OPERATOR NAME	5. OC OPERATOR CODE
ExxonMobil Low Carbon Solutions Onshore	E1041
6. OWNER/OPERATOR MAILING ADDRESS	
22777 Springwoods Village Parkway Spring, TX 77389	
8. TELEPHONE NO	9. E-MAIL ADDRESS
346- 20-7391	cody.todd@exxonmobil.com
10. WELL NAME	11. WELL NO
Huntingbird IZM	1
12. WELL SERIAL NO (Well Conversions Only)	
13. FIELD NAME	14. FIELD CODE
Wildcat - So LA Lafayette District	9727
15. PARISH NAME	16. SECTION
Allenton Parish (02)	29
	17. TOWNSHIP
	5S
	18. RANGE
	3W
19. LOCATION COORDINATES (GCS, NAD 27)	
20. STATE PLANE COORDINATES (LAMBERT, NAD 27)	
LATITUDE: 30° 35 MIN 04.63 SEC	<input type="checkbox"/> NORTH ZONE <input checked="" type="checkbox"/> SOUTH ZONE
LONGITUDE: 92° 41 MIN 54.26 SEC	X: 1,570,445.48 Y: 700,026.65
21. LEGAL LOCATION DESCRIPTION (FROM LOCATION PLAT):	
Surface location being 2,160' from the West Line and 1,000' from the South Line of Section 29, located in Section 29, T5S-R3W, Allenton Parish, Louisiana	
OFFICE OF CONSERVATION	
NOV 26 2024	

UIC-5 STRAT TEST

13

045462

22. LIST PERMITS, LICENSES, OR APPROVALS THE APPLICANT HAS RECEIVED OR APPLIED FOR WHICH SPECIFICALLY AFFECT THE APPLICANT'S LEGAL OR TECHNICAL ABILITY TO CARRY OUT THE PROPOSED ACTIVITY. INCLUDE IDENTIFICATION NUMBER OF APPLICATIONS OR, IF ISSUED, THE IDENTIFICATION NUMBER OF THE PERMIT, LICENSE, OR OTHER APPROVALS.

Regulatory Program or Agency	Permits, Licenses, Construction, Project Approval Identification	
Louisiana Department of Environmental Quality	LPDES Stormwater Permit	

23. WELL CASING / CEMENT DATA

CASING SIZE (OD INCHES)	HOLE DIAMETER (INCHES)	CASING WEIGHT (LB/FT)	CASING SETTING DEPTHS		TOTAL SACKS	SACKS CEMENT (Lead/Tail)	TYPE (Lead/Tail)	YIELD (CU FT/SACK) (Lead/Tail)	CEMENT TOP
			TOP	BOTTOM					
20	26	79	0	100	225	225	A	1.55	surface
9 5/8	12 1/4	47	0	2,600	1,075	875/200	A/A	1.92/1.17	Surface
5 1/2	8 1/2	17	0	3,220	See last line	See last line	See last line	See last line	See last line
5 1/2	8 1/2	23	3,220	7,460	See last line	See last line	See last line	See last line	See last line
5 1/2	8 1/2	17	7,450	7,660	1,588	975/613	A/CO2 COMP.	1.58/1.49	Surface

ALL WELL DEPTHS SHOULD BE GIVEN IN MD

24. BASE OF USDW (FT): 2,430
 REFERENCE E-LOG (SERIAL NUMBER): 104284

27. WELL TOTAL DEPTH (FT): 7,660
 28. PLUGBACK DEPTH (FT): 5,000
 29. TUBING SIZE & DEPTH: NA
 30. PACKER SIZE & DEPTH: NA

INJECTIVITY TEST INFORMATION (IF APPLICABLE)

31. INJECTION ZONE DEPTHS
 Top: 4,800
 Bottom: 7,460

32. COMPLETION/PERFORATION DEPTHS
 Top: 5,030
 Bottom: 7,020

33. WELL COMPLETION OPEN HOLE PERFORATIONS SCREEN

34. TEST MATERIAL (e.g. nitrogen, brine, etc): Brine
 35. MAXIMUM TEST PRESSURE (psi): 4,500
 36. TOTAL INJECTION VOLUME (bbbls): 15,000
 CO₂ is prohibited as a Class V test material

37. Is the Well Located on Indian Lands or Other Lands Owned by or under the Jurisdiction or Protection of the Federal Government? YES NO

38. Is the Well Located on State Water Bottoms or Other Lands Owned by or under the Jurisdiction or Protection of the State of Louisiana? YES NO

39. If the proposed well is associated with a potential Class VI geologic sequestration project, does the applicant own the mineral rights at the proposed well location? YES NO

40. If no, has written notification been provided to the mineral owner(s)? YES NO

OFFICE OF CONSERVATION

NOV 26 2024

INJECTION & MINING DIVISION

045462

41. AGENT OR CONTACT AUTHORIZED TO ACT ON BEHALF OF THE APPLICANT DURING THE PROCESSING OF THIS APPLICATION

NAME: Cody Todd, P.E.
COMPANY: ExxonMobil Low Carbon Solutions Onshore Storage LLC
MAILING ADDRESS: 22777 Springwoods Village Parkway, Spring, TX 77389
TELEPHONE NUMBER: 346-220-7391
E-MAIL ADDRESS: cody.todd@exxonmobil.com

42. CERTIFICATION BY WELL OWNER/OPERATOR

I certify that as the owner/operator of the injection well, the person identified in Item No. 37 above is authorized to act on my behalf during the processing of this application, to submit additional information as requested, and to give oral statements in support of this application. I will grant an authorized agent of the Office of Conservation entry onto the property to inspect the injection well and related appurtenances as per LSA-R.S. 30-4. I agree to operate the well in accordance with Office of Conservation guidelines. I further certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment or both (LSA-R.S. 30:17).

Print Name of Well Owner/Operator ExxonMobil Low Carbon Solutions Onshore	Print Title of Company Official (as applicable) Bruce Chalton - Vice President
Signature of Well Owner/Operator 	Date 11/21/24

OFFICE OF CONSERVATION

NOV 26 2024

INJECTION & MINING DIVISION

OFFICE OF CONSERVATION

NOV 26

INJECTION & MINING DIVISION



FORM UIC-25 STRAT TEST CLASS-V WELL PERMIT APPLICATION

0 4 4 4 5 1

1. APPLICATION TYPE: (Check One) <input checked="" type="checkbox"/> DRILL AND COMPLETE NEW CLASS-V WELL <input type="checkbox"/> CONVERT AN EXISTING WELL TO CLASS-V <input type="checkbox"/> OTHER (SPECIFY):		LOUISIANA DEPARTMENT OF NATURAL RESOURCES - OFFICE OF CONSERVATION INJECTION & MINING DIVISION Injection-Mining@la.gov (225) 342-5515		
2. IDENTIFY WELL USE Stratigraphic test well for data collection in anticipation of a carbon dioxide geologic sequestration project.				
3. IDENTIFY FUTURE WELL USE (i.e. Conversion to Class Vi, monitor well, P&A, etc.) P&A with Geophones cemented downhole for future microseismic monitoring				
4. OWNER/OPERATOR NAME Cleco Power, LLC		5. OOC OPERATOR CODE C1052		
6. OWNER/OPERATOR MAILING ADDRESS 2030 Donahue Ferry Road		7. CITY, STATE, ZIP CODE Pineville, LA 71361		
8. TELEPHONE NO. 318-481-7679		9. E-MAIL ADDRESS robert.breedlove@cleco.com		
10. WELL NAME CLDV-STW1		11. WELL NO. 1		
13. FIELD NAME WILDCAT-NO LA MONROE DIST		12. WELL SERIAL NO. (Well Conversions Only) N/A		
15. PARISH NAME Rapides		14. FIELD CODE 9709		
19. LOUISIANA COORDINATE ZONE (Check One) <input checked="" type="checkbox"/> NORTH ZONE <input type="checkbox"/> SOUTH ZONE		16. SECTION 18		
20. LATITUDE (NORTH) NAD 1927 N 31° 24' 14.38"		17. TOWNSHIP 5N		
21. LONGITUDE (WEST) NAD 1927 W 92° 43' 11.17"		18. RANGE 3W		
23. LATITUDE (NORTH) NAD 1983 N 31° 24' 15.02"		22. LOUISIANA LAMBERT (X-Y) COORDINATES (NAD 1927) X: 1,931,432.25' Y: 268,271.41'		
24. LONGITUDE (WEST) NAD 1983 W 92° 43' 11.71"		25. LOUISIANA LAMBERT (X-Y) COORDINATES (NAD 1983) X: 3,212,220.74' Y: 328,976.71'		
26. LIST PERMITS, LICENSES, OR APPROVALS THE APPLICANT HAS RECEIVED OR APPLIED FOR WHICH SPECIFICALLY AFFECT THE APPLICATION'S LEGAL OR TECHNICAL ABILITY TO CARRY OUT THE PROPOSED ACTIVITY. INCLUDE IDENTIFICATION NUMBER OF APPLICATIONS OR, IF ISSUED, THE IDENTIFICATION NUMBER OF THE PERMIT, LICENSE, OR OTHER APPROVALS.				
Regulatory Program or Agency		Permits, Licenses, Construction, Project Approval Identification		

OFFICE OF CONSERVATION

NOV 15 2023

INJECTION & MINING DIVISION

10 & 4451

27. WELL CASING / CEMENT DATA										
CASING SIZE (OD-INCHES)	HOLE DIAMETER (INCHES)	CASING WEIGHT (LB/FT)	CASING SETTING DEPTHS		CASING GRADE	TOTAL SACKS	SACKS CEMENT (Lead/Fail)	TYPE (Lead/Fail)	YIELD (CU.FT./SACK) (Lead/Fail)	CEMENT TOP
			TOP	BOTTOM						
9 5/8	12 1/4	36	0	1400	J-55	526	292/234	IL-Poz/IL	1.82/1.16	0
5 1/2	8 3/4	17	0	5317	L-80	819	489/330	Class A	1.8/1.54	0
20	24	94	0	80	H-40	150	150	Class A	1.2	0
28. BASE OF USDW		29. WELL TOTAL DEPTH	30. PLUGBACK DEPTH		31. TUBING SIZE & DEPTH		32. PACKER SIZE & DEPTH			
1011		8101	8101		N/A		N/A			
33. INJECTION ZONE DEPTHS (if applicable)		34. COMPLETION/PERFORATION DEPTHS (if applicable)								
Top: N/A Bottom: N/A		Top: 5317 Bottom: 8101		35. WELL COMPLETION (Check One) <input checked="" type="checkbox"/> OPEN HOLE <input type="checkbox"/> PERFORATIONS <input type="checkbox"/> SCREEN						
INJECTION ZONE DEPTHS (if applicable)										
36. TEST MATERIAL (e.g. nitrogen, brine, etc):										
N/A										
37. MAXIMUM TEST PRESSURE (psi):										
N/A										
38. TOTAL INJECTION VOLUME (barrels):										
N/A										
39. Is the Well Located on Indian Lands or Other Lands Owned by or under the Jurisdiction or Protection of the Federal Government? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO										
40. Is the Well Located on State Water Bottoms or Other Lands Owned by or under the Jurisdiction or Protection of the State of Louisiana? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO										
41. AGE T OR CONTACT AUTHORIZED TO ACT ON BEHALF OF THE APPLICANT DURING THE PROCESSING OF THIS APPLICATION										
NAME: Robert Rogalski										
MAILING ADDRESS: 505 King Ave.										
CITY, STATE, ZIP CODE: Columbus, OH 43201										
TELEPHONE NUMBER: 918-510-1458										
E-MAIL ADDRESS: rogalski@battelle.org										
42. CERTIFICATION BY WELL OWNER/OPERATOR										
I certify that as the owner/operator of the injection well, the person identified in item No. 40 above is authorized to act on my behalf during the processing of this application, to submit additional information as requested, and to give oral statements in support of this application. I will grant an authorized agent of the Office of Conservation entry onto the property to inspect the injection well and related appurtenances as per LSA-R.S. 30:4. I agree to operate the well in accordance with Office of Conservation guidelines. I further certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment or both (LSA-R.S. 30:17).										
Print Name of Well Owner/Operator					Print Title of Company Official (as applicable)					
Robert Freedlove					VP Generation Operations					
Signature of Well Owner/Operator					Date					
					11/6/2023					

OFFICE OF CONSERVATION

NOV 14 2023

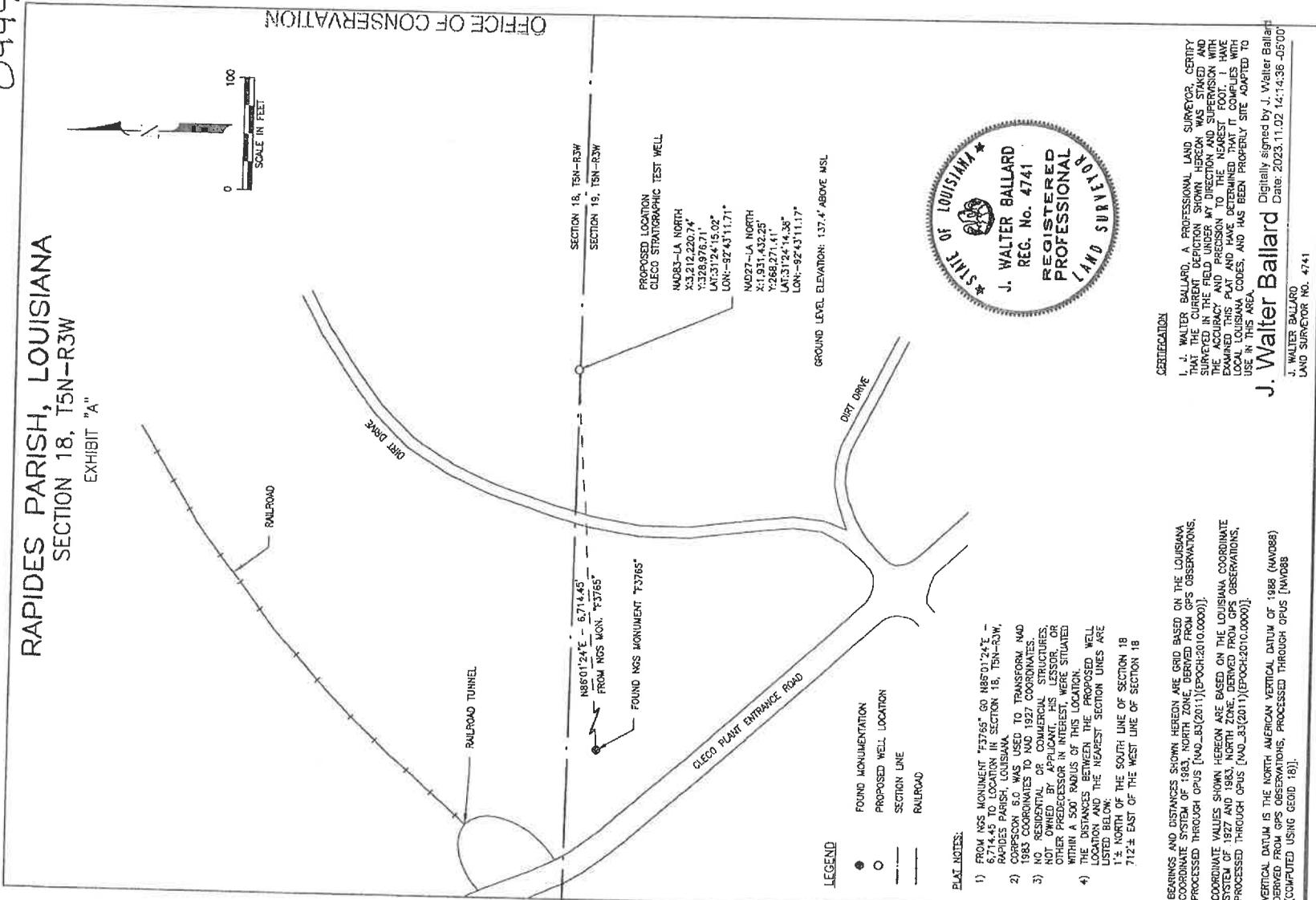
INJECTION & MINING DIVISION

044451

RAPIDES PARISH, LOUISIANA
SECTION 18, T5N-R3W
EXHIBIT "A"

Application No.
044451

NOV 6 2023
INJECTION & MINING DIVISION
OFFICE OF CONSERVATION



PLAT NOTES:

- 1) FROM NGS MONUMENT T3765 TO N88°01'24"E - 6714.45' TO LOCATION IN SECTION 18, T5N-R3W, RAPIDES PARISH, LOUISIANA.
- 2) MONUMENT T3765 WAS USED TO TRANSFORM NAD 83 COORDINATES TO NAD 1927 COORDINATES.
- 3) NO RESIDENTIAL OR COMMERCIAL STRUCTURES, NOT OWNED BY APPLICANT, WERE SITUATED WITHIN A 500' RADIUS OF THIS LOCATION.
- 4) THE DISTANCES BETWEEN THE PROPOSED WELL LOCATION AND THE NEAREST SECTION LINES ARE LISTED BELOW:
 - ± NORTH OF THE SOUTH LINE OF SECTION 18
 - ± EAST OF THE WEST LINE OF SECTION 18

BEARINGS AND DISTANCES SHOWN HEREON ARE GRID BASED ON THE LOUISIANA COORDINATE SYSTEM OF 1983, NORTH ZONE, DERIVED FROM GPS OBSERVATIONS, PROCESSED THROUGH OPUS [NAD_83(2011)(EPOCH:2010.00000)]. COORDINATE VALUES SHOWN HEREON ARE BASED ON THE LOUISIANA COORDINATE SYSTEM OF 1927 AND 1983, NORTH ZONE, DERIVED FROM GPS OBSERVATIONS, PROCESSED THROUGH OPUS [NAD_83(2011)(EPOCH:2010.00000)]. VERTICAL DATUM IS THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAD88) DERIVED FROM GPS OBSERVATIONS, PROCESSED THROUGH OPUS [NAD88] (COMPUTED USING GEOID 18).

CERTIFICATION

J. WALTER BALLARD, A PROFESSIONAL LAND SURVEYOR, CERTIFY THAT THE WHERE SHOWN HEREON WAS STAKED AND SURVEYED IN THE FIELD, THAT THE DIRECTION AND SUPERVISION WITH THE ACCURACY AND PRECISION OF THE BEST FOOT. I HAVE EXAMINED THIS PLAT AND HAVE DETERMINED THAT IT COMES WITH LOCAL LOUISIANA CODES, AND HAS BEEN PROPERLY SITE ADAPTED TO USE IN THIS AREA.

J. Walter Ballard
LAND SURVEYOR NO. 4741
Date: 2023.11.02 14:14:36 -05'00'

HCA		HUNT, GUILLOT & ASSOCIATES, L.L.C.	
603 REYNOLDS DRIVE RUSTON, LA 71270 PHONE: 318-255-6825		FIRM LICENSE NO. LP.0060715	
3	10/31/23	JWB	REVISED LAT AND LONG FORMAT FOR WELL LOCATION
2	10/20/23	JWB	ADDED VERTICAL DATUM NOTE
1	9/05/23	JWB	WELL NAME REVISION
0	8/31/23	BWG	ISSUED
REV.	DATE	BY	DESCRIPTION

WELL LOCATION SURVEY RAPIDES PARISH, LOUISIANA	
DRAWN BY: BWG	DATE: 8/31/23
CHECKED BY: JWB	DATE: 8/31/23
APP.: JWB	DWG. NO. 8.230123.00.0-PLT-001
REV.	REV. 2



044451

Application No. 044451

WELL NUMBER: #1
FIELD: CLDV STW

Project: Cleco Diamond Vault
API # Pending

SURFACE LOCATION:
S18 T5N R3W
Rapides Parish, Louisiana
1' FSL & 712' FWL

Latitude (NAD83): N 31° 24' 15.02"
Longitude (NAD83): W 92° 43' 11.71"

OBJECTIVE: Stratigraphic Test Well
ELEVATION: 137.4 ft ground level above MSL

Proposed Well Formation	CLDV-STW1 MD-(ft)	Correlated Well Serial #
Undiff.	141	USGS R-1228
Fleming Fm.	183	USGS R-1228
Catahoula Fm.	623	46533
Base of USDW	1,011	29600
Vicksburg Gp.	1,011	29600
Cockfield	1,702	29600
Cook Mountain	2,508	29600
Sparta	2,769	29600
Cane River	3,376	29600
Carrizo	3,703	29600
Wilcox 1	3,879	29600
Wilcox 2/Base Big Shale	5,252	29600
Midway	8,001	217433
Well Total Depth	8,101	-

(Note: USGS well is from the USGS National Water Information System)

Table 1: Geological Prognosis

OFFICE OF CONSERVATION

NOV 6 2023

INJECTION & MINING DIVISION