**RE: P20161023** Lake Washington Field, Cockrell Well No. 154.  
after-the-fact ("ATF") Coastal Use Permit application for the unauthorized dredging of a water bottom

Ms Evans,

I am writing on behalf of Gulf Restoration Network, [group list here]. We demand that Louisiana Department of Natural Resources ("LDNR") deny Hilcorp's ATF permit P20161023. LDNR has stated that a permit be issued to register "what happened," but Hilcorp has mislead LDNR in its permit application for P20161023, and LDNR will not know "what happened" unless a full investigation into Hilcorp's impacts to the coast, oyster bottoms, climate, coastal dolphins, and coastal science, is conducted. LDNR must not permit coastal erosion of bottoms and marshes the state seeks to restore.

Hilcorp as submitted an incorrect volume and shape for the damages for P20161023, which does not include the results of LDNR's own investigation. Hilcorp's illegal activity is not "minor contact" but large enough to affect CPRA's bathymetry study of Barataria Bay. LDNR must use CPRA's survey information to assess the volume of Hlicorp's activity for 20161023, but also for P20141657, P20140096, P20160215, P20160225, and any other permits in Lake Washington Field. We assume the volumes for these other applications were also submitted incorrectly--most do not include access channels. There are cumulative impacts to the tidal prism--to erosional forces in this eroding area-- that LDNR must assess before moving forward with a permitting action.

Hilcorp is known for its business model of drilling in depleted oilfields across the coast, which leads to many conflicts with Louisiana's Coastal Master Plan. The activities under P20161023 and others listed above conflict with Barataria Rim Marsh (project 002.MC.07, SMP 2012), but also new plans to build marshes in Barataria to control salinity changes brought by the Mid-Barataria Sediment Diversion. CPRA *and* LDNR must assess the economic damage of Hilcorp's activity to *the plans*to restore the Barataria Rim Marsh, as well as to the project itself (project 002.MC.07, SMP 2012). Hilcorp must assess the volume of the activities under these five permits and order the company to mitigate its damages with appropriate marsh creation consistent with 002.MC.07.

Hilcorp does not look before it leaps. The company has reported at least 6 oil spills into coastal Louisiana marshlands and islands in the past month alone (NRC #'s 1172560, 1173098, 1172826, 1173067, 1171804, and 1171104, in Calliou island, West Bay, and Lake Washington oilfields). The many spills reported by the company, including the large July 2016 spill in this Lake Washington oilfield, are a direct result of flaunting coastal use law and dredging dangerously. The company is fully aware of the legacy problems in Lake Washington field. "Unknown" pipelines in Lake Washington could be known and avoided if the company surveyed the area for its coastal use permit. Instead It has chosen to welcome the consequences of willful ignorance, which are spilling oil, killing marsh acreage and marsh creatures, and harming the health of the Barataria stock of bottlenose dolphins.

LDNR must assess the climate impact of Hilcorp's activity. Lake Washington Field is depleted and produces watery oil that is more carbon intensive to produce than nearby Gulf activity. According to Oil Change International, Lake Washington Field costs the climate 587 kgCO2 per barrel, compared to 508 kgCO2 in the Gulf Mars Field. Over the billions of barrels that the company expects to extract, the carbon impact of drilling in Lake Washington versus the Gulf is large enough to have an effect on the state's plans to build wetlands on the coast.

LDNR must assess the constitutionality of Hilcorp's oyster leases. As of 2011, 43 leases over 2421 acres were under the control of Hilcorp Energy d/b/a Cocodrie Oyster Company, LLC. These areas reveal a plan to insulate the company from its plans to destroy oyster bottoms, marshes, and local wildlife with oil spills, in order to save money on operational costs.

LDNR must assess the foreseeable impacts of these routine oil releases to the health of the Barataria Bay dolphin stock. The bottlenose dolphins of Barataria Bay show severe health impacts from the deepwater horizon, including very low calving success rates. Hilcorp's July 2016 spill oiled 8 square miles of the upper Bay, where dolphins are known to swim.February and March spills shoved more oil into these areas. If the impacts of oiling on this population are not assessed, CPRA and the public will wind up paying for the assessment. This is damage to the public coffers and public trust that must be internalized into Hilcorp's cost of doing business in greater Barataria Bay.

The company's larger business plan must be examined, and LDNR will continue in its willful ignorance if a full investigation is not conducted. We demand a full investigation of Hilcorp for its activities in this area that include P20161023.

Thanks for this opportunity to comment, and we request notification of any changes to P20161023

For a healthy Gulf,

Scott Eustis

Coastal Wetland Specialist

Gulf Restoration Network

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