FILE COPY

AO

A. Oestringer x1577

Operations Division
Central Evaluation Section

JUN 27 2013

Subject: MVN 2005-4437-CR

Goodrich Petroleum Corporation
808 Travis Street, Suite 1320
Houston, Texas 77002

Gentlemen:

This letter is in reference to your Department of the Army (DA) permit, numbered above, authorizing the installation and maintenance of fill for a board road, ring levee, drill site and appurtenances to serve the Normandie Prospect, near Saint Gabriel, Louisiana, in Iberville Parish.

In reference to your letter dated May 22, 2013, containing a proposed site restoration plan, your plan is approved. The restoration work detailed in the special conditions of the NOD-13 permit authorization and in the above referenced letter must begin immediately.

If you have any further questions, you may contact Amy Oestringer of this office at (504) 862-1577.

Sincerely,

Martin S. Mayer
Chief, Regulatory Branch

HERMAN
OD-SC

for MAYER
OD-S

GOODRICH
PETROLEUM CORPORATION

801 Louisiana, Suite 700
Houston, Texas 77002
Off: (713) 780-9494 Fax: (832) 399-3213

22 May 2013

MAY 28 2013

CEMVN-OD-SC
Operations Division, Central Evaluation Section
Department of the Army
New Orleans District, Corps of Engineers
P.O. Box 60267
New Orleans, LA 70160-0267

Attn: Ms. Amy Oestringer

Re: MVN 2005-4437-CR
Proposed Board Road, Drillsite & Structures
For Drilling Normandie Prospect
Section 7, T9S-R2E
Iberville Parish, Louisiana

Dear Ms. Oestringer:

Goodrich Petroleum Company, L.L.C. (Goodrich) submits this proposal to complete the abandonment of the referenced location. Goodrich built the location and installed the cellar containment wall. The location was built up with fill dirt per the approved (General Permit) NOD-13 authorization, however no drilling or any other type of operations ever occurred at this location.

Goodrich requests an extension of the abandonment schedule requirements to complete the abandonment and restoration of the referenced site. The work should be completed in early 2014 based on the scheduling of operations discussed below, including the reforestation.

In early 2012 we authorized Alta Mesa to remove the fill dirt and return the location to original elevation per the permit requirements. Alta Mesa advised Goodrich the fill dirt would be re-used as fill dirt at another well location. In July 2012 Alta Mesa advised they stopped the restoration operations due to land owner issues.

Alta Mesa is currently seeking a COE permit for their Natalbany B #8 proposed site, and Goodrich believes the land owner issues will be resolved with the issuance of this permit. Alta Mesa is ready to resume the restoration efforts as soon as the permit is issued and the water level in the area of both locations recedes. Goodrich anticipates the site restoration work will be completed this summer.

The approved permit included the following special condition "u" of (General Permit) NOD-13 which read in part:

> "..... Abandoned sites shall be replanted with appropriate species, depending upon the ecotype, in the first planting season (December 15 through March 15) following abandonment."

The approval letter also included additional special conditions. Paragraph 10 of the special conditions concerning planting requirements, reads in part as follows:

> "Upon abandonment, the permittee shall provide documentation that the site has been returned to pre-project elevation and that the site has been planted according to the following planting requirements:
>
> 1) The permittee shall plant the impacted site designated in the drawings, with bottomland hardwood tree species in accordance with the provisions outlined below.
>
> a. Planting shall be completed .....
>
> b. A mixture of one year old seedlings .....
>
> c. Application of appropriate herbicides .....
>
> d. Permittee must obtain a seedling survival rate .....
>
> e. Permittee must obtain a minimal survival rate .....
>
> 2) The permittee shall submit to the CEMVN a monitoring report ....."

Goodrich has discussed the reforestation issue with our consultant, Fenstermaker and Associates. They will assist in planning and executing the required reforestation work in accordance with the approved permit and attached special conditions discussed above. Goodrich will perform the reforestation work during the 2013/2014 planting season.

Goodrich will provide written reports updating the COE on the following listed activities:

- upon completion of removal of all fill dirt from the site and leveling of the location to its original elevation,
- when a contractor has been chosen to perform the reforestation work,
- monitoring report following the initial planting in early 2014,
- report of first-year survival rates with any corrective actions taken in early 2105, and
- the final report of the additional four-year long-term survival rates after successful attainment of the one-year criteria has been verified.

Should you have any questions or require additional information, please contact the undersigned at (713) 780-9494, ext. 141

Sincerely,

Darrell H. Knight
VP Production Operations

DEPARTMENT OF THE ARMY
NEW ORLEANS DISTRICT, CORPS OF ENGINEERS
P. O. BOX 60267
NEW ORLEANS, LOUISIANA 70160-0267

February 3, 2006

REPLY TO
ATTENTION OF:
Operations Division
Central Evaluation Section

SUBJECT: MVN-2005-4437-CR

Goodrich Petroleum Corporation
808 Travis Street, Suite 1320
Houston, Texas 77002

Gentlemen:

Receipt is acknowledged of your application dated December 12, 2005, requesting authority to construct and maintain a board road, ring levee, drill site, and appurtenances to serve the Normandie Prospect, near Saint Gabriel, Louisiana, in Iberville Parish.

The proposed work is permitted under authority of SC (General Permit) NOD-13. This approval to perform work is valid for 5 years from the date of this letter. This authorization does not eliminate the need to obtain any other federal, state, or local approval that may be required by law.

The following special conditions are made a part of this permit approval:

1. The permittee agrees to compensate for the temporal and secondary loss of wetland functions at the site and the secondary impacts to the Lago Espanol Mitigation Area located immediately adjacent to the site by contracting with Lago Espanol, L.L.C. for the preservation of 8.4 acres of bottomland hardwoods in Unit I to be managed and operated in accordance with the Lago Espanol, L.L.C. Wetland Mitigation Bank Agreement dated February 9, 1999. Once the contract has been executed, the responsibility to complete the offsite compensatory mitigation requirements of this permit becomes that of Lago Espanol, L.L.C.

2. The permittee shall provide the New Orleans District Corps of Engineers, Regulatory Branch (CEMVN) with written verification from Lago Espanol, L.L.C. that the financial arrangements have been made. This verification shall be provided by prior to commencement of the work authorized in this permit or by August 1 following permit issuance, whichever comes first.

3. Should the well determined to be a dry hole, the permittee shall restore the board road, ring levee, and drill site to pre-project elevations within 90 days of completion of drilling. Restoration will include the removal of all hauled-in fill material from the project site to an upland disposal site, the return of native

material to excavated areas and planting the restored site with appropriate bottomland hardwood seedling planting specifications below.

4. If the well is completed successfully, the permittee shall;

    a. Reduce the well pad to the minimum size necessary for production and the ring levee and that portion of the drill site abandoned shall be restored to pre-project elevations within 90 days of well completion and planted according to the planting specifications below.

    b. Restore the production pad and road dump to pre-project elevations within 90 days of cessation of production, and planted as noted below.

5. The permittee understands that compensating for unavoidable wetland impacts resulting from the authorized action is a necessary part of this permit approval. The permittee also understands that failure to perform the compensatory mitigation, in accordance with the following permit conditions, is considered grounds for permit suspension, permit revocation, and/or restoration of the work performed under this Department of the Army authorization. Therefore, by accepting this authorization, the permittee agrees to perform compensatory mitigation as described in these special conditions.

6. A containerized system, as agreed to in the geological review meeting, shall be used for drilling fluids, or cuttings associated with drilling fluids, which contain agents and dispersants, asbestos viscosifiers, zinc chromate corrosion inhibitors, sodium, chromate/dichromate pH control chemicals, chlorinated phenol biocides, or any other substances classified as Priority Pollutants by the U.S. Environmental Protection Agency. Such fluids and cuttings shall be transported to a State-approved upland disposal facility

7. Culverts shall be positioned along the proposed board road where necessary to maintain the pre-project hydrologic regime of the area.

8. The permittee shall provide to the CEMVN "as-built" drawings certified by a professional land surveyor of the proposed project and identifying whether the well was a dry hole and the site abandoned or whether the well was completed successfully within 30 days of well abandonment/completion. If the well is completed successfully, the "as-built" drawings should identify the area to be maintained as a production pad.

9. The Chitimacha Tribe of Louisiana has stated that the project area is part of the aboriginal Chitimacha homelands. If during the course of work at the site, prehistoric and/or historic aboriginal cultural materials are discovered, the permittee will contact the Chitimacha Tribe of Louisiana at P.O. Box 661, Charenton, LA 70523, and the CEMVN. CEMVN will initiate the required Federal, State, and Tribal coordination to determine the significance of the cultural materials and the need, if applicable, for additional cultural resource investigations.

10. Upon abandonment, the permittee shall provide documentation that the site has been returned to pre-project elevations and that the site has been planted according to the following planting requirements:

1) The permittee shall plant the impacted site designated in the drawings, with bottomland hardwood tree species in accordance with the provisions outlined below.

   a. Plantings shall be completed during the planting period (December 15 through March 15) following completion / abandonment.

   b. A mixture of one year old seedlings composed of bald cypress (*Taxodium distichum*), tupelogum (*Nyssa aquatica*), overcup oak (*Quercus lyrata*), bitter pecan (*Carya aquatica*), nuttall oak (*Quercus nuttallii*), water oak (*Quercus nigra*), cow oak (*Quercus michauxii*), green ash (*Fraxinus pennsylvanica*), mayhaw (*Crataegus opaca*), and common persimmon (*Diospyros virginiana*) shall be planted at appropriate elevations relative to normal water level. Seedlings shall be planted at a maximum spacing of 12 feet by 12 feet and soft mast-producing species shall not comprise more than 35 percent of the mixture.

   c. Application of appropriate herbicides, control burning and/or mowing shall be conducted as necessary prior to planting activities to eradicate or reduce competition from woody and herbaceous vegetation that could adversely affect seedling survival and/or growth.

   d. The permittee must obtain a seedling survival rate of at least 50 percent, and a composition consonant with planted ratios, one year after planting. Appropriate corrective actions shall be implemented on an annual basis in accordance with the above guidelines until these criteria are met.

   e. The permittee must obtain a minimum survival rate of 125 seedlings per acre, and a composition consonant with planted ratios, at the end of the fourth year following successful attainment of the one year criteria.

2) The permittee shall submit to the CEMVN a monitoring report documenting seedling survival and species composition. This report shall include a map showing the specific locations of the planted sites and shall be submitted by March 15th following the initial planting and any subsequent plantings that may be required. A subsequent report, furnishing long-term survival and composition data, shall be submitted four years after successful attainment of the one year criteria has been verified.

11. The permittee is made aware that all planted sites are subject to Clean Water Act jurisdiction and Department of the Army permit authority. Therefore, the permittee shall not conduct any excavation and fill activities on the planted sites without notification of, and written authorization from, CEMVN.

The drawings submitted with your application are attached hereto and made a part of the

record.

Sincerely,

Martin L. May

Ronald J. Ventola
Chief, Regulatory Branch

Enclosures

Copies furnished:

U. S. Fish & Wildlife Service

National Marine Fisheries Service

U. S. Environmental Protection Agency

Louisiana Department of Environmental Quality

Louisiana State Historic Preservation Office

Louisiana Department of Wildlife & Fisheries

Louisiana Department of Health and Hospitals

Louisiana Department of Natural Resources

FILE

BROWN/1570

DEPARTMENT OF THE ARMY
NEW ORLEANS DISTRICT, CORPS OF ENGINEERS
P. O. BOX 60267
NEW ORLEANS, LOUISIANA 70160-0267

February 3, 2006

REPLY TO
ATTENTION OF:
Operations Division
Central Evaluation Section

SUBJECT: MVN-2005-4437-CR

Goodrich Petroleum Corporation
808 Travis Street, Suite 1320
Houston, Texas 77002

Gentlemen:

Receipt is acknowledged of your application dated December 12, 2005, requesting authority to construct and maintain a board road, ring levee, drill site, and appurtenances to serve the Normandie Prospect, near Saint Gabriel, Louisiana, in Iberville Parish.

The proposed work is permitted under authority of SC (General Permit) NOD-13. This approval to perform work is valid for 5 years from the date of this letter. This authorization does not eliminate the need to obtain any other federal, state, or local approval that may be required by law.

The following special conditions are made a part of this permit approval:

1. The permittee agrees to compensate for the temporal and secondary loss of wetland functions at the site and the secondary impacts to the Lago Espanol Mitigation Area located immediately adjacent to the site by contracting with Lago Espanol, L.L.C. for the preservation of 8.4 acres of bottomland hardwoods in Unit I to be managed and operated in accordance with the Lago Espanol, L.L.C. Wetland Mitigation Bank Agreement dated February 9, 1999. Once the contract has been executed, the responsibility to complete the offsite compensatory mitigation requirements of this permit becomes that of Lago Espanol, L.L.C.

2. The permittee shall provide the New Orleans District Corps of Engineers, Regulatory Branch (CEMVN) with written verification from Lago Espanol, L.L.C. that the financial arrangements have been made. This verification shall be provided by prior to commencement of the work authorized in this permit or by August 1 following permit issuance, whichever comes first.

3. Should the well determined to be a dry hole, the permittee shall restore the board road, ring levee, and drill site to pre-project elevations within 90 days of completion of drilling. Restoration will include the removal of all hauled-in fill material from the project site to an upland disposal site, and the return of

native material to excavated areas.

4. If the well is completed successfully, the permittee shall;

   a. Reduce the well pad to the minimum size necessary for production and the ring levee and that portion of the drill site abandoned shall be restored to pre-project elevations within 90 days of well completion.

   b. Restore the production pad and road dump to pre-project elevations within 90 days of cessation of production.

5. The permittee understands that compensating for unavoidable wetland impacts resulting from the authorized action is a necessary part of this permit approval. The permittee also understands that failure to perform the compensatory mitigation, in accordance with the following permit conditions, is considered grounds for permit suspension, permit revocation, and/or restoration of the work performed under this Department of the Army authorization. Therefore, by accepting this authorization, the permittee agrees to perform compensatory mitigation as described in these special conditions.

6. A containerized system, as agreed to in the geological review meeting, shall be used for drilling fluids, or cuttings associated with drilling fluids, which contain agents and dispersants, asbestos viscosifiers, zinc chromate corrosion inhibitors, sodium, chromate/dichromate pH control chemicals, chlorinated phenol biocides, or any other substances classified as Priority Pollutants by the U.S. Environmental Protection Agency. Such fluids and cuttings shall be transported to a State-approved upland disposal facility

7. Culverts shall be positioned along the proposed board road where necessary to maintain the pre-project hydrologic regime of the area.

8. The permittee shall provide to the CEMVN "as-built" drawings certified by a professional land surveyor of the proposed project and identifying whether the well was a dry hole and the site abandoned or whether the well was completed successfully within 30 days of well abandonment/completion. If the well is completed successfully, the "as-built" drawings should identify the area to be maintained as a production pad.

9. The Chitimacha Tribe of Louisiana has stated that the project area is part of the aboriginal Chitimacha homelands. If during the course of work at the site, prehistoric and/or historic aboriginal cultural materials are discovered, the permittee will contact the Chitimacha Tribe of Louisiana at P.O. Box 661, Charenton, LA 70523, and the CEMVN. CEMVN will initiate the required Federal, State, and Tribal coordination to determine the significance of the cultural materials and the need, if applicable, for additional cultural resource investigations.

The drawings submitted with your application are attached hereto and made a part of the

record.

Sincerely,

MAYER
OD-SC

Ronald J. Ventola
Chief, Regulatory Branch

VENTOLA
OD-S

Enclosures

Copies furnished:

U. S. Fish & Wildlife Service

National Marine Fisheries Service

U. S. Environmental Protection Agency

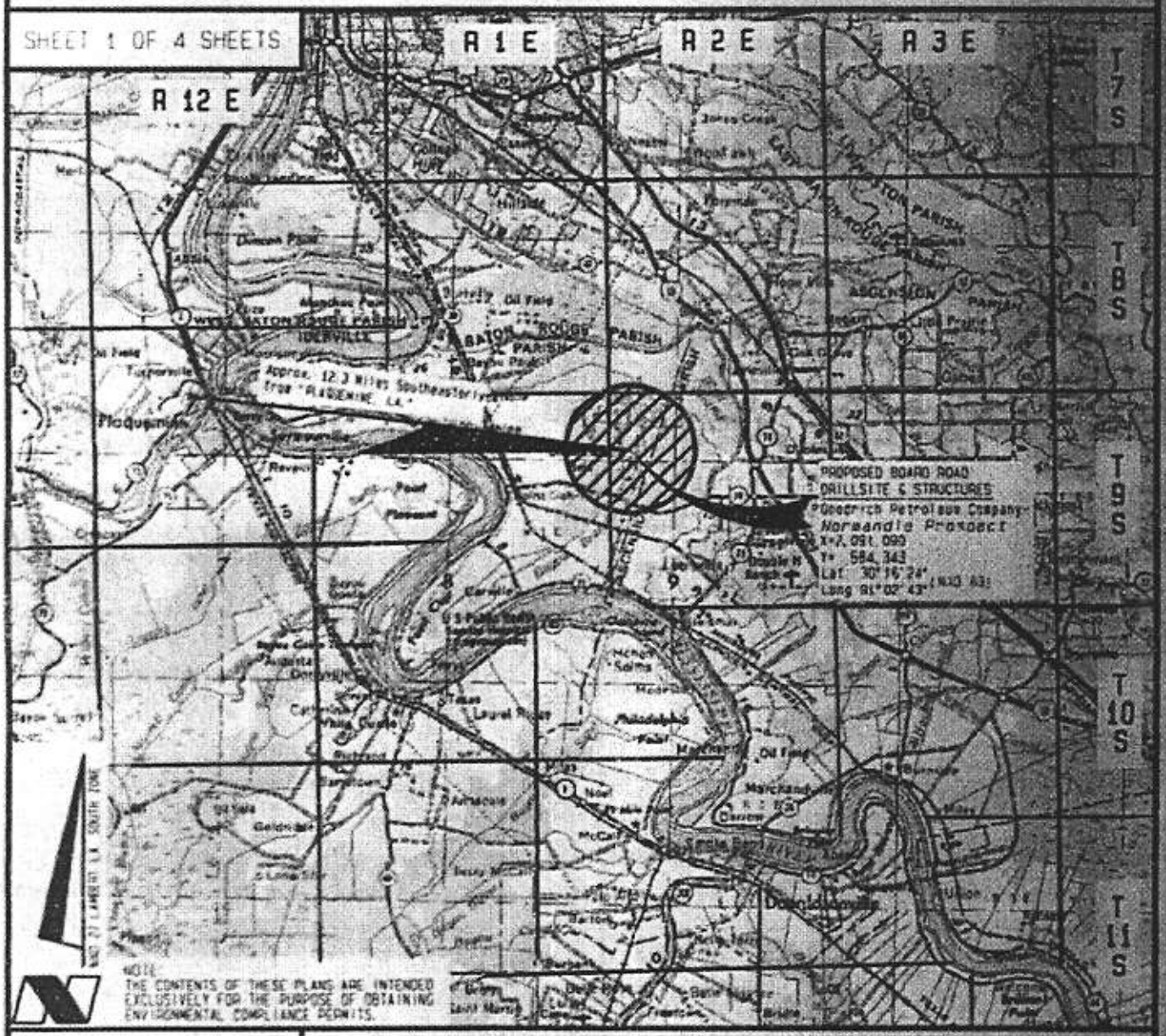
Louisiana Department of Environmental Quality

Louisiana State Historic Preservation Office

Louisiana Department of Wildlife & Fisheries

Louisiana Department of Health and Hospitals

Louisiana Department of Natural Resources



REVISED 01/17/06 RB

Topography obtained from U.S. Geological Survey Map "BATON ROUGE, LA" 1954 Edition Revised 1972

VICINITY MAP

Scale 1" 250,000

Drawn By: NCC
Proj. Mgr.: RLL

Application By:

GOODRICH PETROLEUM COMPANY

January 9, 2006

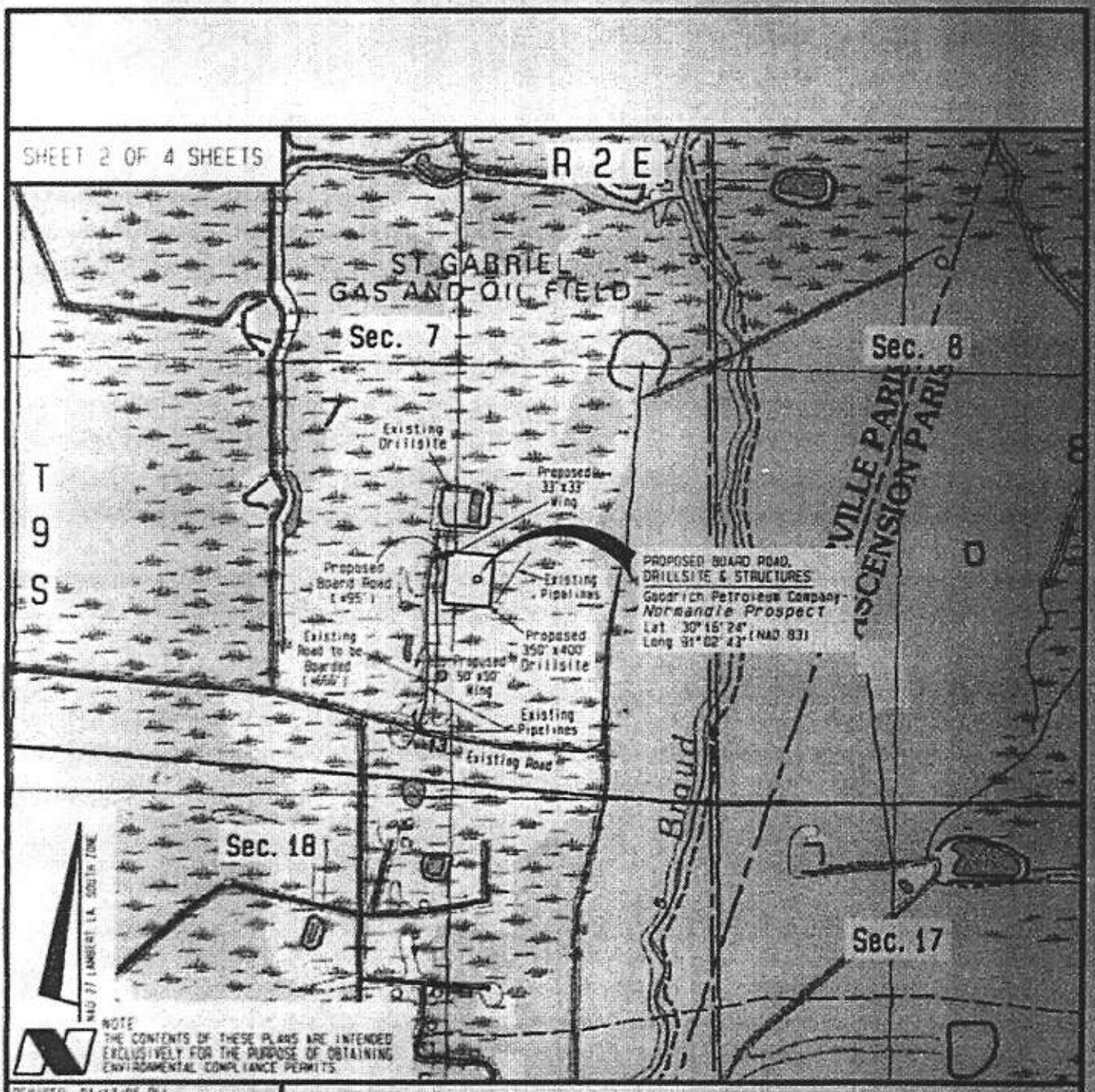
PROPOSED BOARD ROAD, DRILLSITE & STRUCTURES

For Drilling *Normandie Prospect*

Section 7, T9S-R2E

Iberville Parish, Louisiana

PREPARED BY: C.H. Fenstermaker & Associates, Inc., Lafayette & New Orleans, Louisiana, & Houston, Texas



REVISED 01/17/06 RLL

Topography obtained from U.S. Geological Survey Quadrangle "ST. GABRIEL, LA" 1992 Edition.

VICINITY MAP

Scale: 1" = 1000'

Application By

GOODRICH PETROLEUM COMPANY

January 9, 2006

205783 I /infocad/east/9S2E 101
I /infocad/pcs/usgs/la/drg/south 359

PROPOSED BOARD ROAD, DRILLSITE & STRUCTURES

For Drilling *Normandie Prospect*

Section 7, T9S-R2E

Iberville Parish, Louisiana

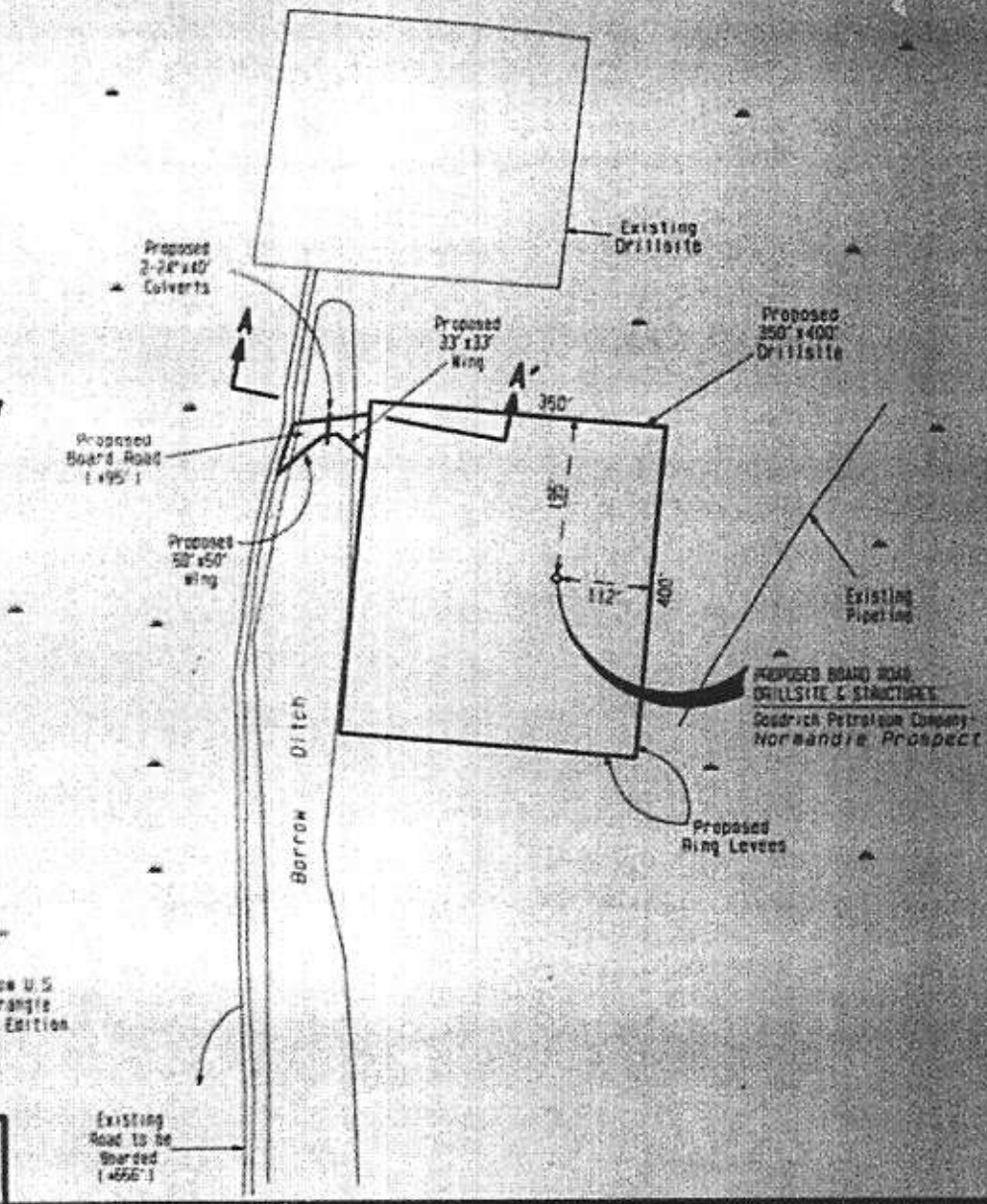
PREPARED BY C.H. Fenstermaker & Associates, Inc., Lafayette & New Orleans, Louisiana & Houston, Texas

SHEET 3 OF 4 SHEETS

R 2 E

T 9 S

Sec. 7



PLAN VIEW

Scale: 1" = 200'

Topography obtained from U.S. Geological Survey Quadrangle "ST. GABRIEL, LA" 1992 Edition

NOTE:
THE CONTENTS OF THESE PLANS ARE INTENDED EXCLUSIVELY FOR THE PURPOSE OF OBTAINING ENVIRONMENTAL COMPLIANCE PERMITS.

REVISED: 01/17/06 ALL

Application By:

GOODRICH PETROLEUM COMPANY

January 9, 2006

2057583 I:/infocad/east/952E 102

PROPOSED BOARD ROAD, DRILLSITE & STRUCTURES

For Drilling *Normandie Prospect*

Section 7, T9S-R2E

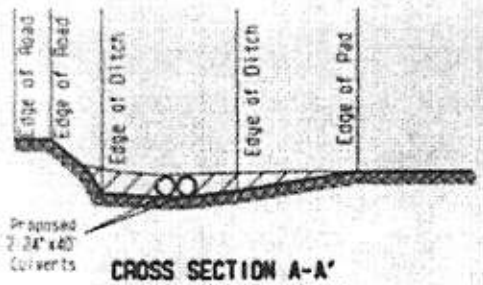
Iberville Parish, Louisiana

PREPARED BY: C. H. Fenstermaker & Associates, Inc., Lafayette & New Orleans, Louisiana & Houston, Texas

SHEET 4 OF 4 SHEETS

FILL REQUIRED FOR CULVERTS . . . . . 168 CU. YDS.
FILL REQUIRED FOR DRILLSITE & RING LEVEES . . . . 10,670 CU. YDS.

SOUTHEASTERLY

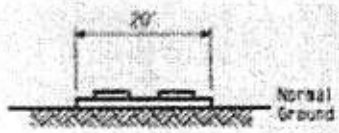


CROSS SECTION A-A'

Horizontal Scale 1"=50'
Vertical Scale 1"=20'

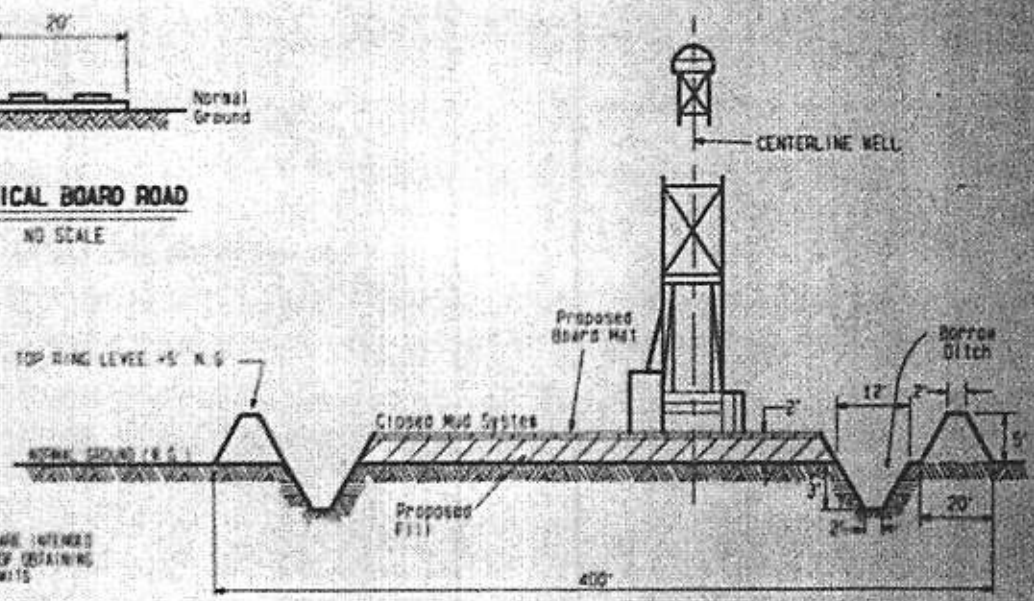
NOTES:

1. Fill material for drillsite to be hauled in from offsite upland location.
2. The drillsite and ring levees will be degraded within 90 days following abandonment. The material will be deposited to the extent practicable into the borrow areas from which the material was excavated and the area leveled and restored to as near preproject conditions as practicable.
3. In the event the well is productive, boards may be replaced with gravel or other suitable permitizing material and the area restored except for the minimum area required for production.
4. Closed mud system will be used.



TYPICAL BOARD ROAD

NO SCALE



NOTE
THE CONTENTS OF THESE PLANS ARE INTENDED EXCLUSIVELY FOR THE PURPOSE OF OBTAINING ENVIRONMENTAL COMPLIANCE PERMITS

REVISED: 01/17/06 RLL

TYPICAL CROSS-SECTION OF DRILLSITE

No Scale

Application By:

GOODRICH PETROLEUM COMPANY

January 9, 2006

2057583 I:/infocad/east/952E 102

PROPOSED BOARD ROAD, DRILLSITE & STRUCTURES

For Drilling *Normandie Prospect*

Section 7, T9S-R2E

Iberville Parish, Louisiana

PREPARED BY: C. H. Fenstermaker & Associates, Inc., Lafayette & New Orleans, Louisiana & Houston, Texas

GOODRICH
PETROLEUM CORPORATION

801 Louisiana, Suite 700
Houston, Texas 77002
Off: (713) 780-9494 Fax: (832) 399-3213

6 March 2013

MAR 11 2013

CEMVN-OD-SC
Operations Division, Central Evaluation Section
Department of the Army
New Orleans District, Corps of Engineers
P.O. Box 60267
New Orleans, LA 70160-0267

Attn: Ms. Amy Oestringer

Re: MVN 2005-4437-CR
Proposed Board Road, Drillsite & Structures
For Drilling Normandie Prospect
Section 7, T9S-R2E
Iberville Parish, Louisiana

Dear Ms. Oestringer:

Goodrich Petroleum Company, L.L.C. (Goodrich) appreciates your patience while we work to complete the abandonment of the referenced location. Goodrich built the location but never drilled the proposed well. The location was built up with fill dirt per the approved (General Permit) NOD-13 authorization but no drilling or other type operations ever occurred at this location.

Goodrich requests an extension of the abandonment schedule requirements to complete the abandonment and restoration of the referenced site through early 2014 based on the below discussed scheduling of operations and reforestation.

In early 2012 we authorized Alta Mesa to remove the fill dirt and return the location to original elevation per the permit requirements. Alta Mesa advised Goodrich the fill dirt would be re-used as fill dirt at another location. In July 2012 Alta Mesa advised they stopped the restoration operations due to land owner issues.

Alta Mesa is currently seeking a COE permit for their Natalbany B #8 proposed site. Goodrich believes the land owner issues will be resolved with the issuance of this permit. Alta Mesa is ready to resume the restoration efforts as soon as the permit is issued and the water level in the area of both locations recedes. Goodrich anticipates the site restoration work will be completed this summer.

The approved permit included the following special condition "u" of (General Permit) NOD-13 which read in part:

> "..... Abandoned sites shall be replanted with appropriate species, depending upon the ecotype, in the first planting season (December 15 through March 15) following abandonment."

Goodrich has discussed the reforestation issue with our biology consultant, Fenstermaker and Associates. They will prepare and supervise the reforestation plan. Goodrich will submit the reforestation plan to your office for approval on or about 1 November 2013 and perform the reforestation work during the 2013/2014 planting season in accordance with COE approved reforestation plan.

Goodrich will provide written reports updating the COE on the following listed activities:

- upon completion of removal of all fill dirt from the site
- upon completion of leveling and returning the location to its original elevation
- on or about 1 November 2013 with submittal of the "reforestation plan"
- when a contractor has been chosen to perform the reforestation work, and
- when all work is complete in early 2014.

Should you have any questions or require additional information, please contact the undersigned at (713) 780-9494, ext. 141

Sincerely,

Darrell H. Knight
VP Production Operations

A. Oestringer x1577

JAN 30 2013

Operations Division
Central Evaluation Section

Subject: MVN 2005-4437-CR

FILE COPY

Goodrich Petroleum Corporation
808 Travis Street, Suite 1320
Houston, Texas 77002

Gentlemen:

This letter is in reference to your Department of the Army (DA) permit, numbered above, authorizing the installation and maintenance of fill for a board road, ring levee, drill site and appurtenances to serve the Normandie Prospect, near Saint Gabriel, Louisiana, in Iberville Parish.

By letter dated October 9, 2012, (copy enclosed) we requested additional information in order to resolve a possible non compliance with the NOD-13 authorization. Specifically, we require a restoration plan. To date, we have received no response.

Please be advised that performing work without a permit may subject you to civil and/or criminal action for violation of Section 10 of the Rivers and Harbors Act of 1899 and/or Section 404 of the Clean Water Act.

Please provide, within **10 days** of the date of this letter, a written explanation that fully addresses the points itemized above, and furnish any information that will assist us in determining whether or not the work was conducted in accordance with the authorization granted under NOD-13.

I look forward to hearing from you. If you have any questions, please call me at (504) 862-1577.

Sincerely,

Martin S. Mayer
Chief, Regulatory Branch

Herman
OD-SC

for Mayer
OD-S

Enclosures

Operations Division
Central Evaluation Section

Oestringer x1577

OCT 09 2012

FILE COPY

Subject: MVN 2005-4437-CR

Goodrich Petroleum Corporation
808 Travis Street, Suite 1320
Houston, Texas 77002

Gentlemen:

This letter is in reference to your Department of the Army (DA) permit, numbered above, authorizing the installation and maintenance of fill for a board road, ring levee, drill site and appurtenances to serve the Normandie Prospect, near Saint Gabriel, Louisiana, in Iberville Parish.

Based on a report of non-compliance dated July 18, 2012, and after careful review of the authorized plans, it appears that some of the work has not been conducted in accordance with your DA permit conditions. Specific aspects of the project that are of concern are as follows:

1. Fill material remains on the site and it appears that site restoration has not been performed. Please see the special conditions of the NOD-13 permit below:

   u. Road fills and/or drilling pads in wetlands constructed with native material shall be degraded when the locations which they were installed to serve are abandoned. The material shall be deposited to the extent practicable into the borrow areas from which it was excavated and the area leveled and restored to as near pre-project conditions as practicable. If the road fills and/or drilling pads in wetlands were constructed with hauled-in material, that material shall be removed from the site and hauled to a non-wetland area, with the project site being leveled and restored to as near pre-project conditions as practicable. Restoration must be accomplished within 90 days of abandonment unless the District Engineer has granted additional time in writing because of weather conditions or clearly unusual circumstances. Requests for additional time must be made by the permittee or agent in writing at least 20 days prior to expiration of the 90 day period allowed for restoration. Abandoned sites shall be replanted with appropriate species, depending upon the ecotype, in the first planting season (December 15 through March 15) following abandonment.

   z. The District Engineer must be notified of abandonment of wells served by facilities authorized by this general permit within 10 days of abandonment. The notification must be in writing and must include the date of abandonment and the estimated date the restoration work will begin.

Please be advised that performing work without a permit, or conducting work in a manner not in compliance with your authorization, may subject you to a civil and/or criminal action for violation of Section 10 of the Rivers and Harbors Act of 1899 and/or Section 404 of the Clean Water Act.

Please provide, within **20 days** of the date of this letter, a written explanation that fully addresses the points itemized above, and furnish any information that will assist us in determining whether or not the work was conducted in accordance with the authorization granted under NOD-13.

If you have any further questions, you may contact Amy Oestringer of this office at (504) 862-1577.

Sincerely,

Pete J. Serio
Chief, Regulatory Branch

Enclosure:
NOD-13

MAYER
OD-SC

SERIO
OD-S

Oestringer, Amy L

From: Scott Nesbit [Scott.Nesbit@wetlandsreport.com]
Sent: Thursday, January 24, 2013 10:06 AM
To: Oestringer, Amy L
Cc: Breaux, Brian W MVN; Guarisco, Brad A MVN
Subject: MVN-2005-4437-CR

Good Morning Ms. Oestringer:

The purpose of this email is to request a status update of Goodrich's noncompliance (restoration) MVN-2005-4437-CR. It is our understanding that the USACE issued a letter of noncompliance to Goodrich in October, 2012, requesting a current proposed restoration plan for review. Shortly thereafter, SLR as landowner, formally requested a copy of any proposed restoration from the applicant. To date, SLR has not received a proposed restoration plan from your office and can only assume none has been submitted by Goodrich.

It is important for SLR to be apprised of any noncompliance by Goodrich, or any other operator, adversely impacting the mitigation bank. Please know that SLR is not requesting that the USACE act in any specific way, but rather update us regarding this regulatory issue as soon as possible. This need is based on our ongoing (3-year) management pursuit to the reorganize SLR for long-term ecosystem sustainability and full compliance with the intent of its 1997 Mitigation Banking Instrument. As the oldest bank in our watershed, this is an important step both for SLR and for mitigation banking in general.

In summary, SLR needs to understand whether the activities that have occurred and are ongoing within our mitigation bank are allowable permitted activities by the USACE. This is extremely important to our organization and our bank's future policies going forward so that we can fully understand our banks requirements for compliance within its conservation servitude.

Please note that I have copied Mr. Brian Breaux of the USACE Special Operations, who has met with us both formally and informally concerning the possible reorganization of SLR. I have also copied Mr. Brad Guarisco from Surveillance and Enforcement as he was the USACE agent on this action.

As a point of interest, during my career as a wetland consultant it is apparent that long-term ecological damages to wetlands resulting from oil and gas exploration are mostly cumulative in nature, and that large releases and damages are relatively unusual. However, it is the accumulation of these continuous, relatively small releases and physical impacts (rutting, clearing, maintenance dredging, etc) that result in large scale ecological impacts over time as they are seldom repaired. Thus as an official mitigation bank Sponsor and conservation steward, and to remain in compliance with our conservation servitude, all oil and gas exploration activities, especially unpermitted activities in or on land adjacent land to a wetland mitigation banks are of utmost concern. Any appropriate information you can provide regarding Goodrich's status or any predecessors acting on their behalf would be

greatly appreciated. Further, if your office has deemed that corrective measures on behalf of Goodrich or any predecessors are warranted, please let us know.

Should you have any questions regarding this inquiry, please do not hesitate to contact me at 225-928-5333. We look forward to any information or guidance you can provide regarding this matter. Thank you for your attention,

Sincerely,

Scott Nesbit

President

Natural Resource Professionals, LLC

4664 Jamestown Avenue Suite 420

Baton Rouge, LA 70808

Office: 225.928.5333

Cell: 225.439.9205

Email: scott.nesbit@wetlandsreport.com

Natural Resource Professionals, LLC

Wetlands Permitting • Environmental Review • Land Use Planning

4664 Jamestown Ave. Ste. 420 Baton Rouge, Louisiana 70808
Phone: 225.928.5333 Fax: 225.246.8319

OCT 10 2012

October 8, 2012

Department of the Army Corps of Engineers
New Orleans District, Corps of Engineers
P.O. Box 60267
New Orleans, LA 70160-0267
Amy Oestringer, Environmental Resources Specialist
Regulatory Branch
Subject: MVN-2005-4437-CR- Goodrich Petroleum Corporation Restoration Plan

Ms. Oestringer;

On behalf of Spanish Lake Restoration, LLC (SLR), Natural Resource Professionals, LLC (NRP) has prepared this correspondence requesting a copy the proposed Goodrich Petroleum restoration plan (restoration plan) for a constructed well site to serve the Normandie Prospect, near St. Gabriel, Louisiana, in Iberville Parish. The restoration of the well site is a condition of Section 404 permit MVN-2005-4437-CR.

SLR is purchased Lago Espanol Wetlands Mitigation Bank in 2009, and became its approved Sponsor in 2010. The well site to be restored is referenced as the Natalbany Heirs Well, which is within SLR property and its conservation boundary. As such, SLR is responsible for maintaining and protecting all land within its conservation boundary for perpetuity once the restoration is complete.

It is for these reasons that NRP is respectfully requesting a copy of the Goodrich Petroleum restoration plan to be submitted to your office per your request in September, 2012. The intent of any SLR comments or recommendations would be to minimize potential short term impacts to SLR land during restoration activities, or to facilitate a successful restoration final project.

SLR fully understands that the US Army Corps of Engineers (USACE) will make an independent assessment and/or approval as to any proposed restoration plan for the subject tract and has no obligation to include any recommendations from SLR or it agent. Any comments provided by SLR would be based on familiarity with current site conditions.

Please contact me at 225-928-5333 if you have any comments or questions regarding this request.

Sincerely,

Scott Nesbit
President, Natural Resource Professionals, LLC
Part Owner/Managing Partner, Spanish Lake Restoration, LLC
4664 Jamestown Ave. Suite 420
Baton Rouge, LA 70808