Tulane University

May 18, 2018

Tulane Environmental Law Clinic

By email to: blake.canfield@la.gov and certified mail # 7017 2400 0001 0528 2638
Blake Canfield, Esquire
Louisiana Department of Natural Resources
617 N. Third Street
Baton Rouge, LA 70804

Re: Request for Immediate Action on Bayou Bridge Pipeline's Continued Construction; *Joseph v. DNR*, 23rd Judicial District Court, Case No. 38, 163 E

Dear Mr. Canfield,

As you may know, on judicial review of the permit issued by the Louisiana Department of Natural Resources, Office of Coastal Management (DNR), to Bayou Bridge Pipeline, LLC, the 23rd Judicial District Court found in favor of our clients, the Plaintiffs, on May 10, 2018. The Court signed a judgment formalizing that ruling on May 15, 2018. Both are attached. The Court ordered that the DNR require Bayou Bridge to develop an effective emergency response and evacuation plan for the residents of St. James "PRIOR to the continued issuance of said permit." In doing so, the Court ordered the agency to address the dangerous situation our clients in that community face every day.

Yet our clients report that on May 15 and continuing through today, Bayou Bridge continues to construct in the Coastal Zone and in the town of St. James, including in areas that may interfere with development of an evacuation route. We are aware that the DNR has received similar complaints about Bayou Bridge Pipeline's ongoing construction from the public, which included photographic evidence of such construction.

We are concerned that the DNR is in contempt of court in failing to order Bayou Bridge to cease and desist construction activities until it, and DNR, have complied with the Court order and unless and until DNR issues a legal permit. This requires immediate action. Please respond as to how and when the agency intends to proceed. I look forward to hearing from you.

Respectfully,

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