

Richard P. Ieyoub, Commissioner
Louisiana Department of Natural Resources
Office of Conservation
617 North Third Street
LaSalle Building, 9th Floor
Baton Rouge, LA 70804

Dear Commissioner Ieyoub:

As a member of the St. Landry Parish Council I am writing to you in opposition to the permit application for the installation and operation of a commercial saltwater disposal facility by Eagle Oil, LLC (David Mayeaux et ux SWD No. 1 located at 13910 Hwy. 182 Barn, Bunkie, LA 71322).

There are many reasons to oppose this application, I am sure you will hear many of them during the course of this hearing. My primary objection deals with the lack of enough resources held in escrow by the principals to mitigate potential environmental hazards as a result of this project. Secondly, I am concerned regarding the limited experience the principals of Eagle Oil, LLC in managing the financial resources of a project of this size, and finally I am concerned about the close proximity of the disposal well to the St. Landry Parish landfill approximately 4800 LF east of the well site.

Before I offer comments regarding my objections to this project I would like to share the results of my research regarding the three principals of Eagle Oil, LLC. According to the Secretary of State the three principals of Eagle Oil, LLC are Mr. Michael James Fussell, Jr. of Lafayette, LA, Mr. Toby James Hargrave, of Rayne, LA and Mr. Nicholas Palmer of Lafayette, LA.

Mr. James Michael Fussell, Jr.: My research reveals that Mr. Fussell is a practicing attorney providing legal services covering Energy & Natural Resources, General Litigation and Employment & Labor issues. Mr. Fussell was admitted to practice law in 2005. Mr. Fussell is a principal in J Michael Fussell Jr., LLC, located at 1000 Marilyn Dr., in Lafayette, LA and also the agent and officer in J Michael Fussell Jr., LLC. The business operates in the snowshoes business/Industry within the miscellaneous manufacturing industries sector. This venture has been in business for approximately 4 years and is estimated to generate \$61,128 in annual revenue and employs 1 employee. Mr. Fussell is listed by the secretary of state as a member of CFH, LLC. which was registered on 2/25/2016. Presently CFH LLC is listed by the Secretary of State as Not in Good Standing for failure to file an Annual Report. According to the Secretary of State, Mr. Fussell is also a member and or agent in several other companies.

Mr. Toby James Hargrave.: My research reveals Mr. Hargrave is 34 years and completed high school. He lives in Rayne, LA, and is a member of the Louisiana Oil and Gas Association, AAPL, LAPL, ALPAPL. Additionally, he is a member of the Petroleum Club of Lafayette and listed as a Commercial Salt Water Disposal Specialist. He is listed as the owner of Fossil Energy L.L.C., which was registered with the Secretary of State in 2007 Charter Number 36390690K. Fossil Energy L.L.C. was listed inactive on 4/3/2012 by Voluntary Action. Fossil Energy, LLC was registered again on 3/26/2013 Charter Number 41121729K and is presently in good standing. Mr. Hargrave is registered as the agent of Elite Energy LLC, registered on 8/14/2012 Charter Number 40915197K. Presently Elite Energy is listed as Inactive by action of the Secretary of State. In 8/5/2014 Mr. Hargrave was listed as the agent and manager for Sniper Apparel, LLC, Charter Number 41601934K. On 11/15/2017 an amendment was filed with the

secretary of state listing the registration of Sniper Apparel, LLC as revoked. On 7/8/2015 Moby Prospects, LLC was registered, Charter Number 41943212K, listing Mr. Hargrave as the agent/member and Mr. James Fussell, Jr. as a member. On 1/22/2016 Charter Number 42143675K was issued to Moby Customs Homes, LLC listing Mr. Hargrave as member and Mr. Fussell as a member by the Secretary of State. Presently, Moby Custom Homes, LLC is listed Not in good standing for failure to file annual report.

Mr. Nicholas Palmer.: My research of Mr. Nicholas Palmer reveals that Mr. Palmer's address is 224 Palms Dr., Lafayette, LA. He is 32 years old. Mr. Palmer is listed by the secretary of state a member of Eagle Oil, LLC., along with Mr. Fussell, and Mr. Hargrave. No other information is available on Mr. Palmer.

Now for my objections:

In review of the information gathered through research of the principals and their involvement in various businesses they have attempted the past few years, several concerns have come to light. Two of the principals have attempted several business ventures in the past few years which apparently have failed. In addition, the variety of business attempts ranging from the oil and gas industry to snowshoes retail business to the business of building of custom homes. This variety of failed businesses demonstrates an apparent lack of commitment and/or an inability to manage businesses. Since several of those business registrations presently listed by the Secretary of State are listed as Not in Good Standing for failure to file annual reports is also indicative of a lack of commitment or oversight to business activities.

Another very important concern is the relatively small cash reserves required by DNR in the event of the closure of this facility. With the potential environmental impact this project could cause to the community, this cash reserve would in no way mitigate the damages caused to the community if this facility is not managed appropriately. Located less than a mile east of the project is the St. Landry Parish Landfill, a publicly owned facility, which is required by LDEQ to have a cash reserve of, \$7,000,000 of taxpayer money in the event of closure of the facility should a problem development. If the project is approved despite the negative environmental impact to the community, we are asking a that a private company pumping millions of gallons of waste in the ground be held to the same cash reserve requirement of \$7,000,000.

Mr. Ieyoub please don't allow this project to be imposed on this community of faithful and determined taxpayers who have everything to lose and nothing to gain by allowing this undercapitalized, inexperienced, and dangerous waste start-up company a permit to inflict its will upon these people.

Sincerely,

Harold L. Taylor
St. Landry Parish Council Member District 5
650 North Wilderness Road
Port Barre, LA 70577

