

10
NO. 11 ORIGINAL

IN THE

Supreme Court of the United States

OCTOBER TERM, 1956 1958

UNITED STATES OF AMERICA, PLAINTIFF
V.

STATE OF LOUISIANA, DEFENDANT

MOTION FOR LEAVE TO FILE INTERVENTION,
BRIEF IN SUPPORT OF MOTION,
AND INTERVENERS' ANSWER

✓ L. H. PEREZ, District Attorney and
ex-Officio Attorney for Parishes
of Plaquemines and St. Bernard
and Counsel for Interveners, 2307
American Bank Bldg., New Or-
leans, Louisiana.

✓ L. O. PECOT, District Attorney and
ex-Officio Attorney for Parishes
of Iberia and St. Mary and Coun-
sel for Interveners, Franklin, Lou-
isiana.

W BERTRAND DE BLANC, District
Attorney and Counsel for Inter-
veners, Lafayette, Louisiana.

✓ FRANK LANGRIDGE, District At-
torney and ex-Officio Attorney
for Parish of Jefferson and Coun-
sel for Interveners, Gretna, Lou-
isiana.

✓ FRANK J. LOONEY,
Shreveport, Louisiana.
Of Counsel.

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UNITED STATES OF AMERICA, PLAINTIFF
V.
STATE OF LOUISIANA, DEFENDANT

MOTION FOR LEAVE TO FILE INTERVENTION

The Parishes' of St. Bernard, Plaquemines, Jefferson, Iberia, and St. Mary, subdivisions of the State of Louisiana, authorized to intervene herein by their Governing Bodies, as shown by certified copies of resolutions hereto attached, move the Court for an order permitting them to intervene as defendants in this action, in order to assert the defenses set forth in their proposed answer, on the following grounds:

I

The representation of applicants' interest by the existing party defendant in this cause is or may be inadequate, as shown by defendant's answer, which claims various conflicting gulfward boundaries for the State of Louisiana, and particularly by the prayer thereof which fails to ask for judgment decreeing the

1. Same as Counties in all other States.

State of Louisiana to be the owner of the submerged lands and natural resources within its historic boundary, 3 leagues from coast, or for an accounting from plaintiff for rentals and royalties collected by it from mineral leases within said State Gulfward boundary, in all of which applicants have a legal interest, and applicants will be bound by any judgment or orders rendered in this action because, under State Law, applicants' gulfward boundaries are co-extensive with the gulfward boundary of the State of Louisiana.

II

Under State Law, applicants exercise the right of local government and taxation over their respective areas and jurisdictions within the State's historic gulfward boundary, and therefore they have a legal right to maintain their territorial integrity.

III

Applicants are so situated as to be adversely affected by a distribution and disposition of large sums of money subject to the control and disposition by judgment and orders of the Court in this action, which said sums were received and withheld by the United States, plaintiff, as royalty payments under mineral leases executed on submerged lands of the State of Louisiana, defendant, within applicants respective maritime boundaries. Said sums are due and payable to the defendant under provisions of the Submerged Lands Act of May 22, 1953, and applicants have a legal interest therein under State Law.

IV

A copy of applicants' proposed pleading and annexed exhibits are attached hereto.

V.

This intervention has questions of law and fact in common with the main action, and will not delay the trial, nor prejudice the adjudication of the rights of the original parties in this action. Plaintiff and defendant have not filed briefs in support of their demands, and this action is fixed for hearing on April 8, 1957, when Interveners will require only about 20 minutes in argument.

VI

WHEREFORE, applicants pray that an order be entered permitting the Parishes of St. Bernard, Plaquemines, Jefferson, Iberia and St. Mary, applicants for intervention, to intervene and become parties defendants in this case.

L. H. PEREZ, District Attorney and
ex-Officio Attorney for Parishes
of Plaquemines and St. Bernard
and Counsel for Interveners,

L. O. PECOT, District Attorney and
ex-Officio Attorney for Parishes
of Iberia and St. Mary and Counsel
for Interveners,

BERTRAND DE BLANC, District
Attorney and Counsel for Inter-
veners,

FRANK LANGRIDGE, District At-
torney and ex-Officio Attorney for
Parish of Jefferson and Counsel
for Interveners,

FRANK J. LOONEY,
Of Counsel.

February, 1957

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V.
STATE OF LOUISIANA, DEFENDANT

BRIEF IN SUPPORT OF MOTION**INTERVENTION OF RIGHT**

Applicants are entitled to intervene in the present action as of right for the reason that the representation of applicants' interests by the existing party defendant is or may be inadequate and applicants for intervention will be bound by a judgment in this action.

FRCP Rule 24 (a) 2, and new Rule 9 (2).

Representation of applicants' interests by the existing party defendant is inadequate, as shown by defendant's answer, which fails to lay proper emphasis on the historic gulfward boundary of the State of Louisiana, 3 leagues from coast, as fixed by its Constitution prior to and at the time the State was admitted into the Union, as approved by Congress, and also fixed by the Act of Congress which admitted the State into the Union', and which said coast line was desig-

1. 1812 Constitution of La., preamble, Act of April 8, 1812, Public Stats. at Large of U. S. A., Vol. II, pp 701-3.

nated and defined by the lawful agencies of the federal government under applicable Acts of Congress, and approved by the Louisiana Legislature².

The complaint and answer fail to recognize the fundamental legal principle fixed in the Constitution of the United States³ that Congress and only Congress may admit new States into the Union and fix their boundaries and, therefore, no State boundary can be established, fixed or changed by any of the political agencies of the federal government, nor is it a political question dependent upon diplomatic exchanges or foreign policy; and that after a State has been admitted into the Union by Act of Congress, its boundary cannot be changed, not even enlarged, without the consent of its Legislature⁴.

2. Act of Feb. 10, 1807, Stats. at Large of U. S. A, Vol. II, pp 413-4, USCA 33, Sec. 881; Acts of Feb. 19, 1895, C. 102, §2, 28 Stat. 672; Feb. 14, 1903, C. 552, 32 Stat. 829; 33 USCA Sec. 151: "The term 'high seas' means all waters outside the line dividing the inland waters from the high seas as defined in Section 151, Title 33." 46 USCA Sec. 224 (a), (12) (a), and C. G. 169, March 1, 1955, PART 82—BOUNDARY LINES OF INLAND WATERS, Sections 82.1, 82.2, 82.95, 82.103, C & G Charts 1267, 1270, 1272 to 1279, incl. Act 33 of the 1954 Louisiana Legislature.

3. Art. IV, §3.

4. Act of Congress, April 14, 1812, enlarging limits of State of Louisiana, provided: "in case the legislature of the State of Louisiana shall consent thereto."

The First Session of the Louisiana Legislature, on July 27, 1812, adopted an Act, Chapter 3, page 8 of the Acts of 1812, and a Concurrent Resolution approved August 4, 1812, approving and consenting to the enlargement of the limits of the State, as provided by said Act of Congress.

Re: Changing State boundary: See Henry Gannett, Department of the Interior, "Boundaries of the United States and of the Several States and Territories", 1904, pp 9-18, where the United States and Britain engaged in diplomatic exchanges, appointment of survey commissions, and, finally, of a friendly Sovereign to arbitrate the disputed boundary between Canada and Maine,—the subject of fruitless negotiation for 44 years which almost led to war with Britain. When the friendly Sovereign made an award in favor of Canada, the State of Maine protested, and the United States Senate accordingly refused to give its assent to the award, giving as its reason, that, "However disposed the Government of the United States might have been to acquiesce in the decision of the arbiter, it had not the power to change the boundaries of a State without the consent of the State." Geological Survey Bulletin 817, p17.

Said answer also fails to show, in compliance with the Submerged Lands Act of Congress⁵, that the boundaries of the State of Louisiana in the Gulf of Mexico as they existed at the time such State became a member of the Union extended from the coast line 3 marine leagues into the Gulf of Mexico, and that it was so provided by the Constitution of the State of Louisiana prior to and at the time it became a member of the Union⁶, which said Constitution was approved by said Act of Congress of April 8, 1812.

That as shown by Act 33 of the 1954 Louisiana Legislature, the State of Louisiana stands upon its historic gulfward boundary, 3 leagues from coast, as described in its original Constitution in 1812, and as fixed by the Act of Congress which admitted it into the Union on April 8, 1812; and the State accepted and approved its coast line, or the line marking the seaward limit of its inland waters, as designated and defined by agencies of the federal government under the applicable Acts of Congress of 1807 and 1895, as amended.

This congressional legislation was for the purpose of defining the inland waters of the United States⁷.

The waters within the dividing line so designated and defined between the high seas and the rivers, harbors and inland waters pursuant to the 1895 Act, are inland waters⁸.

Applicants will be bound by final judgment in this action and such judgment will be *res adjudicata* of the

5. Sec. 2 (b) and Sec. 4, Public Law 83d Congress, 67 Stat. 29.

6. Preamble of Constitution of Louisiana of 1812.

7. *U. S. v. Newark Meadows Imp. Co.* (C. C. N. Y. 1909) 173 F. 426, @ p. 428.

8. "*The Delaware*" (N. Y. 1896) 161 U. S. 459, @ p. 463.

legal rights sought to be protected through intervention, because the gulfward boundaries of applicants, as coastal parishes of the State of Louisiana, are co-extensive with the State⁹.

Applicants are in a separate category from other non-coastal parishes of the State because as coastal parishes they have a substantial property interest consisting of a percentage of oil royalties in the mineral resources of the submerged lands of the State of Louisiana within its said historic boundary¹⁰.

After December 11, 1950, when the decree was entered in the Case of the **United States v. Louisiana**¹¹, various State lessees of mineral rights in the submerged lands of the State of Louisiana within 3 leagues from coast in the Gulf of Mexico paid large sums of money for rentals and royalties under said leases to the United States, plaintiff, (shown by circles in tracts on Maps annexed to the Answer marked Interveners Exhibits 15 to 22) ; and since said date, plaintiff advertised and sold various oil and gas leases on tracts of submerged lands both within Louisiana's inland waters and within Louisiana's gulfward boundary 3 leagues from coast within applicants' boundaries, (shown on said Maps in tracts shaded black), from which said plaintiff received additional large sums of money. All such sums received by plaintiff are required to be paid to defendant by the Submerged

9. Acts 32 and 33 of the 1954 Louisiana Legislature.

10. La. Con. Art. IV, §2. Royalty interests are real property rights under Louisiana Law. 1950 R.S. 9:1105.

11. 339 U.S. 699.

Lands Act of Congress¹². Applicants have a legal right to ten percent (10%) of said royalties as above¹³, which are subject to distribution and disposition by the final judgment and orders of court in this action.

Intervenors issued bonds aggregating several millions of dollars secured by revenues from said 10% royalties, with the faith and credit of said Parishes pledged therefor, under authority of the State Constitution. Applicants would be adversely affected in such distribution or disposition of said funds, unless permitted to intervene in this action.

The 1946 amendment to Rule 24 (a) (3), adding the words "subject to the control or disposition", "covers the situation where property may be in the custody of some other officer or agency—such as the Secretary of the Treasury—but the control and disposition of the property is lodged in the court wherein the action is pending¹⁴."

Applicants have right of intervention because of their legal interest in property or funds, subject to distribution and disposition by judgment and orders of Court in this action."¹⁵

Applicants are also entitled to as much as \$200,000 from State severance taxes collected from oil, gas and sulphur produced within their respective bound-

12. Sec. 3 (c), Pub. Law 31, 83d Cong., 67 Stat. 29.

13. La. Con. Art. IV, §2.

14. Advisory Committee Note to Rule 24, U. S. C. A. 28, p. 130.

15. *Kaufman v. Societe Internationale Pour Participations Industrielles et Commerciales S. A.*, 72 S. Ct. 611, 343 U. S. 156.

aries¹⁶, including the State's gulfward boundary therein.

Applicants exercise delegated portions of the right of State government and sovereignty, and have the legal right under the State Constitution and Laws to impose ad valorem taxes on all taxable property within their boundaries (including their portion of defendant's gulfward boundary at issue in this action), for local government purposes in their respective subdivisions of the State, including civil and criminal courts, sheriffs and peace officers, assessors and tax collectors, and the construction, maintenance and operation of courthouses, school houses, other public buildings, roads, bridges, sewerage and drainage works and other permanent public improvements, title to which shall be in the public¹⁷. For the foregoing reasons, applicants have a legal right to present their defenses in this action to protect their legal interests and property rights, and their territorial integrity.

Applicants annex to their intervention verified copies of official instruments, maps and other evidence, in support of their intervention, the consideration of which will not delay the trial in any manner nor prejudice the adjudication of the rights of the original parties in this action. Neither plaintiff or defendant has filed its brief in support of their demands fixed for hearing in this Court on April 8, 1957. Inter-

16. La. Con. Art. X, §21, maximum of \$200,000 yearly allocated to Parishes from State severance taxes on oil, gas and sulphur production.

17. La. Con. Art. X, §10; Art. XIV, §8, 11 and 14 (c), (d), (e);

veners will require only about 20 minutes in argument to present their defense and legal rights on hearing thereof.

CONCLUSION

It is respectfully submitted that Motion for Leave to File the Intervention should be granted.

L. H. PEREZ, District Attorney and
ex-Officio Attorney for Parishes
of Plaquemines and St. Bernard
and Counsel for Interveners,

L. O. PECOT, District Attorney and
ex-Officio Attorney for Parishes
of Iberia and St. Mary and Counsel
for Interveners,

BERTRAND DE BLANC, District
Attorney and Counsel for Inter-
veners,

FRANK LANGRIDGE, District At-
torney and ex-Officio Attorney for
Parish of Jefferson and Counsel
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FRANK J. LOONEY,
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INTERVENERS' ANSWER

Now come the Parishes of St. Bernard, Plaquemines, Jefferson, Iberia and St. Mary, subdivisions of the State of Louisiana, duly authorized by resolutions of their governing bodies, verified copies of which are hereto annexed, intervening herein as defendants,

hereinafter termed "INTERVENERS", and with respect show that:

FIRST DEFENSE

Interveners deny all allegations of plaintiff's complaint, except as may be hereinafter particularly admitted.

I

The jurisdictional question has been disposed of by order of the Court on defendant's motion directed thereto.

II

The allegation that the United States had possession and dominion over the lands, minerals and other things underlying the Gulf of Mexico from the outer limits of inland waters on the coast of Louisiana to the edge of the continental shelf, "**except as set forth in Paragraph IV,**" when construed with the Submerged Lands Act of Congress, 67 Stat. 29, Sec. 2. (b) and (c), Sec. 3. (a) and (b), quitclaiming to Gulf Coastal States a maximum of 3 leagues from Coast, within historic State boundaries, and the Act of Congress which admitted Louisiana as a State into the Union and fixed its gulfward boundary at 3 leagues from coast in the Gulf of Mexico, on April 8, 1812, must be taken as an admission by plaintiff that the defendant State of Louisiana has ownership and possession of all said submerged lands, minerals and other things underlying the Gulf of Mexico, within 3 marine leagues from coast, or from the seaward limit of its inland waters.

III

Neither said Submerged Lands Act or the Outer Continental Shelf Lands Act requires any accounting to plaintiff from the defendant State, said Acts supercede said Court decision, and Plaintiff is bound by these Acts of Congress.

IV

Said Submerged Lands Act recognized, confirmed and established title to and ownership of the submerged lands and resources in the defendant State, and "released and relinquished" unto said State "all right, title and interest of the United States, if any it has" thereto, within the State's historic boundary, 3 leagues from coast in the Gulf of Mexico.

Section 2 of the Act provides that when used in this Act—"(b) The term "boundaries" includes * * * its boundaries in the Gulf of Mexico * * * as they existed at the time such State became a member of the Union, or as heretofore approved by the Congress, or as * * * confirmed pursuant to Section 4 hereof but in no event shall the term "boundaries" or the term "lands beneath navigable waters" be interpreted as **extending from the coast line more than * * * three marine leagues into the Gulf of Mexico;**" (Emphasis added).

"(c) The term "coast line" means **the line of ordinary low water along that portion of the coast which is in direct contact with the open sea and the line marking the seaward limit of inland waters;**" (Both lines synonymous).

By its use of the most specific language as above, "the line" along the sea coast and "the line" marking

the seaward limit of inland waters, Congress most certainly did not intend to provide for **any line** which might be arbitrarily drawn on a map by the Secretary of the Interior, as has been attempted by the "Chapman Line" without legal authority. Nor did Congress intend any such line as suggested in plaintiff's brief of March, 1956, pp 9 to 12, which would require several years of judicial inquiry for decision as to its location along the State's shore line of 7721 miles, instead of the existing Louisiana coast line 397 miles long, already designated and defined by United States Agencies under authority of Acts of Congress of 1807 and 1895, as amended, and as shown on Coast and Geodetic Survey Charts.

The use of the phrase "of ordinary low water" does not change the location of **the line**, because the tide ebbs and flows and the waters rise and fall along the sea coast as well, and to the same extent as within the tidal inland waters or along the tidal shores. High water and low water or any water elevation, is measured on a perpendicular gauge, up or down,—but not by distance.

That said coast line, or **the line** marking the seaward limit of inland waters of the State of Louisiana has been designated and defined by agencies of the United States, plaintiff, under applicable Acts of Congress of Feb. 10, 1807 and Feb. 19, 1895, as amended, as shown in footnote 2 of Interveners' Brief in Support of Motion.

The 1807 Act authorized the President to cause a survey to be taken of **the coasts of the United States**

within twenty leagues of any part of the shores of the United States. (Emphasizing the vast difference between "coast" and "shore").

The 1895 Act vested the authority in the Secretary of the Treasury, to designate and define by suitable bearings, buoys, or coast objects, **"the line dividing the high seas from rivers, harbors and inland waters,"** while the 1807 Act was still in effect authorizing fixing the **maximum distance of the coast 20 leagues from the shores.**

Under Section 101 of Reorganization Plan No. 3 of 1946, Congress vested that authority in the Commandant of the Coast Guard.

In United States Coast Guard pamphlet CG-169, March 1, 1955, PART 82. BOUNDARY LINES OF INLAND WATERS, the Commandant published regulations as follows:

Section 82.1 states,

"The waters inshore of the lines described in this part are 'inland waters' * * *. The waters outside of the line described in this part are the high seas * * *.

Sections 82.95 and 82.103 of said PART 82 describe said lines as follows:

"82.95 MOBILE BAY, ALA., TO MISSISSIPPI PASSES, LA.—Starting from a point which is located 1 mile, 90° true, from Mobile Point Lighthouse, a line drawn to Mobile Entrance Lighted Whistle Buoy 1; thence to Ship Island Lighthouse; thence to Chandeleur Lighthouse; thence in a curved line following the general trend of the seaward, high-water shore lines of the

Chandeleur Islands to the southwesternmost extremity of Errol Shoal (Lat. 29°35.8' N., Long. 89°00.8' W.); thence to Pass a Loutre Lighted Whistle Buoy 4."

"82.103 MISSISSIPPI PASSES, LA., TO SABINE PASS, TEX.—A line drawn from Pass a Loutre Lighted Whistle Buoy 4 to South Pass Lighted Whistle Buoy 2; thence to Southwest Pass Entrance Mid-channel Lighted Whistle Buoy; thence to Ship Shoal Lighthouse; thence to Calcasieu Pass Lighted Whistle Buoy 1; thence to Sabine Pass Lighted Whistle Buoy 1." (Emphasis added to show Louisiana Coast line.)

The line marking the coast line or seaward limit of the State's inland waters are shown on Charts 1267, 1270 and 1272 to 1279, inclusive, of the Coast and Geodetic Survey. There is attached hereto as "Interveners—Exhibit 1", a comprehensive C. & G. S. Chart showing the entirety of Louisiana's said coast line.

Louisiana's said coast line according to scale shown on these Charts measures about 397 miles, the same distance for the Louisiana coast line as stated by plaintiff in its memorandum dated March, 1956, at bottom of page 9.

The line marking the seaward limit of the State's inland waters, or the State coast line, also is in compliance with the definition of "coast line" in the Submerged Lands Act, Section 2 (c) copied above,

Said line marking the coast line or seaward limit of inland waters is also in compliance with prior Acts of Congress, such as USC 46:224 a:

“(12) Where used in this section—

“(a) The term “highseas” means all waters outside **the line** dividing the inland waters from the highseas, as defined in Section 151 of Title 33.

USC 33:151 also defines the term “highseas” to mean “all waters outside **the line** dividing the inland waters from the highseas,” (footnote 2, Brief in support of motion, *supra*.)

Section 4 of said Act, 67 Stat. 29, regarding **SEA-WARD BOUNDARIES** provides:

* * * “Nothing in this section is to be construed as questioning or in any manner prejudicing the existence of any State’s seaward boundary beyond three geographical miles if it was so provided by its Constitution or laws prior to or at the time such State became a member of the Union, or if it has been heretofore approved by Congress.”

The boundary of the State of Louisiana, defendant, as described in its Constitution of 1812, prior to and at the time it became a member of the Union, and as approved by and again described in the Act of Congress of April 8, 1812, which admitted the State into the Union, is three leagues from **coast** in the Gulf of Mexico.

Nowhere in the State’s original Constitution or in the Act of Congress admitting Louisiana as a State into the Union and fixing its boundary will any reference be found fixing its gulfward boundary as “3 miles” or as any distance from “shore”; but to the contrary the only gulfward boundary described therein is “3 leagues” from “coast.”

Said 3 leagues from coast historic boundary of the State of Louisiana, defendant, as fixed by the Act of Congress admitting it as a State into the Union on April 8, 1812, has been adjudicated upon by this Court in *Louisiana v. Mississippi*, 202 U. S. 1, 26 S. Ct. 408, 416, as follows:

"2. The state of Louisiana was admitted into the Union by the act of Congress approved April 8, 1812 (2 Stat. at L. 701, chap. 50), which commenced as follows:

" 'Whereas, the representatives of the people of **all that part of the territory or country ceded under the name of 'Louisiana' by the treaty made at Paris on the thirtieth day of April, one thousand eight hundred and three, between the United States and France, contained within the following limits, that is to say: Beginning at the mouth of the River Sabine; thence by a line to be drawn along the middle of said river, including all islands, to the thirty-second degree of latitude; thence due north to the northernmost part of the thirty-third degree of north latitude; thence along the said parallel of latitude to the River Mississippi; thence down the said river to the River Iberville; and from thence along the middle of the said river and Lakes Maurepas and Pontchartrain to the Gulf of Mexico; thence bounded by the said gulf to the place of beginning including all islands within three leagues of the coast; . . .**' (Emphasis added, to show that the limits fixed were "within 3 leagues of the coast.")

"Map of diagram No. 1, given in the opening statement, shows the limits as thus defined."

A reprint of this map of diagram No. 1 with a reprint of the map attached to Act 33 of 1954 on the same scale, marked diagram No. 2, is attached hereto, marked Interveners' Exhibit 2.

From an examination of these two maps, it will be seen that the outer boundary line, or gulfward limit of the State of Louisiana as shown in Diagram No. 1, held by this court to be a correct showing of the State limits as defined in the Act of April 8, 1812, compares with the outer gulfward boundary of Louisiana as shown on the map officially adopted by Act 33 of the 1954 Louisiana Legislature."

V

The facts and law regarding the historic gulfward boundary of the State of Louisiana, defendant, are given in Paragraph IV, above.

If by the allegations in Paragraph 5 of the complaint, the contention is made that at the time Louisiana became a member of the Union, the maritime boundary of the **Union** did not extend more than 3 geographic miles from the outer limit of inland waters, as indicated in plaintiff's memorandum of March, 1956, p. 3, that,

"From its very beginning, this nation has held firmly to the principle that three miles is the proper limit for the extension of a nation's jurisdiction over the sea,"

such contention is unfounded and made without regard for the Treaty of Independence with Great Britain in April, 1783, the Second Article of which described the Atlantic boundary of the original coastal States as "20 leagues from shore", as shown by said Treaty and a contemporary map secured from the Library of Congress, bearing the legend, "An ACCURATE MAP of the UNITED STATES of America according to the Treaty of Peace of 1783", showing "The Twenty League Line," attached hereto as Interveners' Exhibit 3.

In 1823, this Court unanimously held, through Chief Justice Marshall, that by that Treaty which concluded the War of our Revolution, the boundaries of the United States were fixed in the Second Article, and Great Britain relinquished all claim, not only to the government but to the "propriety and territorial rights" which previously had been in Great Britain, definitely to these States, *Johnson v. M'Intosh*, 8 Wheat. @ 582; and that said Treaty was "the most solemn of all international acts", *Harcourt v. Gaillard* (1827) 12 Wheat. 523, 527.

It was this Treaty which prompted the framers of the Constitution to provide in Article VI, Clause 2, that, "all treaties made" are a part of the supreme law of the land. (69th Congress, 1st Session House Document No. 398, @ p. 618).

Plaintiff's contention that the State's boundary depends upon assertion by the United States of jurisdiction over the adjoining seas involving foreign relations, and depends upon "executive statements" fixing the national boundaries, does violence to the Constitution which vests the authority solely in Congress to admit new States into the Union and to fix their boundaries, and thereby to fix the national boundaries made up of member States.

The United States, plaintiff, and its legal representatives are bound by the provision of the United States Constitution, Article IV, Section 3, granting to Congress the exclusive authority to admit new States into the Union and to fix their boundaries, and by the Acts of Congress relative hereto, and no political agent, agency or department of the United States government has any legal right to assume any function

or authority with regard to the State's boundary contrary to the provisions thereof.

Said contention is further untenable in the face of a decision by the International Court of Justice on Dec. 18, 1951, (**United Kingdom v. Norway**), that such historic boundary fixed by lawful authority in 1812 constitutes historic title thereto.

Any present day political effort as alleged in the complaint to restrict the nation's extensive historic maritime boundaries, long since fixed by the 1783 Treaty and Acts of Congress admitting new coastal states into the Union, which would expose our coasts to easier enemy attack, is repelled by such outstanding historic facts and prior unanimous decisions of this Court.

VI

The matter of possession and ownership by the State of Louisiana of the submerged lands and resources within 3 leagues from coast in the Gulf of Mexico, are as set out in Paragraph IV, above, and the matter of an alleged accounting is answered in Paragraph III.

VII

As shown by Acts 32 and 33 of the 1954 Louisiana Legislature and Sections 2 and 3 of Title 49 of the La. Rev. Stats., which laws are binding on all State Agencies and officials, the State of Louisiana and Interveners, defendants, claim no right in the Gulf of Mexico, or the Continental Shelf therein, beyond 3 leagues from coast, and defendant has done nothing to interfere with any of the operations of plaintiff or

its lessees in the Outer Continental Shelf or the submerged lands thereof lying seaward and outside of the area defined in Section 2 of the Submerged Lands Act. Copies of said Acts are annexed hereto as "Interveners—Exhibits 4 and 5".

Said Act 33 of 1954 amending the State Revised Statutes Title 49, Section 1, simply redefined the State's historic boundary, 3 leagues from coast, as fixed by the Acts of Congress of April 8, 1812, and accepted and approved its coast line, or "**the line**" marking the seaward limit of its inland waters as designated and defined by the federal government under applicable Acts of Congress of 1807 and 1895, as amended.

Sections 2 and 3 of said Title 49 and Section 1101 of Title 9, provide that the State of Louisiana owns all submerged lands and resources within its boundary, subject to all constitutional powers of the United States.

To the contrary, without any legal right or authority so to do, and in violation of all applicable Acts of Congress above referred to, and since the effective date of the Submerged Lands Act, agencies of the United States, plaintiff, have persisted in interfering with and obstructing the defendant State in its orderly and effective operations for mineral development of the submerged lands of the State of Louisiana within 3 leagues from coast in the Gulf of Mexico, and in fact also inside of its coast line or the line marking the seaward limit of its inland waters, as designated and defined by the United States Government under applicable Acts of Congress, and they have granted mineral leases thereon, as shown by photostatic copies of Department of Interior maps hereto annexed and marked,

"Intervenors—Exhibits 6 to 13, incl.", all to the irreparable loss and damage of the defendant State and Intervenors.

VIII

NO PARAGRAPH VIII

IX

Plaintiff's contention that the "fundamental question" in issue is the width of the marginal sea within the jurisdiction of the United States which involves inquiry into and application of its foreign policy, is negatived by the Submerged Lands Act which retains all powers in the United States over foreign policy, national defense, etc., in the submerged land areas, within the State's boundaries as follows:

"Sec. 6. Powers Retained By The United States.—(a) The United States retains all its navigational servitude and rights in and powers of regulation and control of said lands and navigable waters for the constitutional purposes of commerce, navigation, national defense and international affairs, all of which shall be paramount to, but shall not be deemed to include, proprietary rights of ownership, or the rights of management, administration, leasing, use, and development of the lands and natural resources which are specifically recognized, confirmed, established, and vested in and assigned to the respective States and others by section 3 of this Act."

Contrary to the plain provisions of the above Act of Congress and the decision of this Court holding said Act to be constitutional legislation beyond judicial review, on March 15, 1954, **Alabama v. Texas, et al.**, and **Rhode Island v. Louisiana, et al.**, 347 U. S. 272, it is the evident purpose of the complaint in this action to curtail the historic boundary of the defendant State as a subterfuge to claim rights of ownership in the name of the United States to such property within the State's historic boundary.

Instead of the fundamental question in issue being the application of foreign policy to the marginal sea, the fundamental issue may well be whether the political agencies of the United States can succeed at this late date, (145 years after Congress admitted the defendant State into the Union and fixed its boundary on April 8, 1812), in changing the historic boundary of a State of the Union to nationalize its property, in violation of the United States Constitution, the Acts of Congress pertaining thereto, and the legal rights and sovereignty of the State, and its people.

SECOND DEFENSE

I

Interveners have a legal interest in property and funds subject to distribution and disposition by judgment and orders of court in this action, consisting of a 10% royalty interest in all royalties to which the State of Louisiana may be entitled out of minerals produced within their respective Parish boundaries, which are co-extensive with the boundaries of the State of Louisiana at issue in this action; and applicants likewise are entitled to their portion of said

funds withheld by plaintiff which are subject to distribution and disposition by judgment and orders of court in this action.

II

Applicants are entitled to a maximum of \$200,000.00 from State severance taxes collected from the production of oil, gas and sulphur produced within their respective boundaries, including the State's gulfward boundary therein in issue here.

III

Applicants, under the Constitution and Laws of the State of Louisiana, exercise delegated portions of the right of State government and sovereignty, and have the legal right to impose ad valorem taxes on all taxable property within their boundaries (including their portion of defendant's gulfward boundary at issue in this action), for local government purposes in their respective subdivisions of the State, including civil and criminal courts, sheriffs and peace officers, assessors and tax collectors, and the construction, maintenance and operation of courthouses, school houses, other public buildings, roads, bridges, sewerage and drainage works and other permanent public improvements, title to which shall be in the public.

WHEREFORE, Interveners-defendants pray that, after evidence received on the trial on the merits and due proceedings had in this action, there be judgment in favor of defendant, the State of Louisiana, and In-

terveners-defendants, decreeing said State to have title to and ownership of the lands beneath its navigable waters extending from its coast line 3 marine leagues into the Gulf of Mexico, and the natural resources within such lands and waters, and the right and power to manage, administer, lease, develop and use said lands and natural resources in accordance with applicable State law, subject to the constitutional authority of the United States, plaintiff, over said lands and waters for the purpose of navigation, interstate and foreign commerce, national defense, and international affairs, and that plaintiff and its agents, officers and employees be enjoined from interfering with the peaceful management, control, development and use of said rights, property and natural resources; and that plaintiff, through its proper officers, be required to account to the State of Louisiana for all minerals and other things of value taken therefrom, and for all sums of money received from said submerged lands and minerals, whether from cash bonuses, rentals, and royalties and other payments, in which Interveners have a property right as provided by the Constitution and laws of the State of Louisiana.

Interveners-defendants further pray for all further orders and decrees as the nature of this action

may require and for full, general and equitable relief of defendant and Interveners, all in accordance with law.

L. H. PEREZ, District Attorney and
ex-Officio Attorney for Parishes
of Plaquemines and St. Bernard
and Counsel for Interveners,

L. O. PECOT, District Attorney and
ex-Officio Attorney for Parishes
of Iberia and St. Mary and Counsel
for Interveners,

BERTRAND DE BLANC, District
Attorney and Counsel for Inter-
veners,

FRANK LANGRIDGE, District At-
torney and ex-Officio Attorney for
Parish of Jefferson and Counsel
for Interveners,

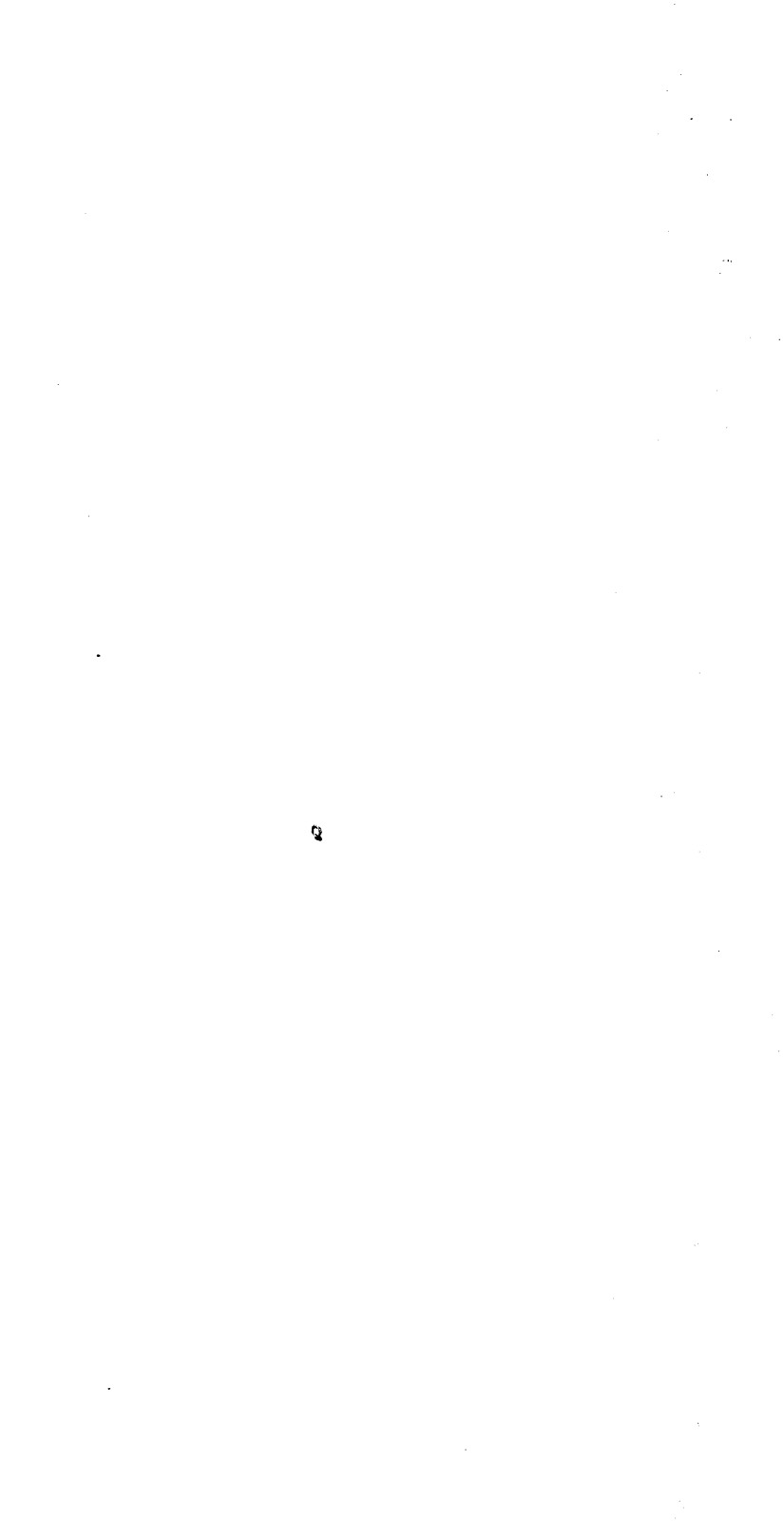
FRANK J. LOONEY,
Of Counsel.

February, 1957

PROOF OF SERVICE

I, Leander H. Perez, one of the attorneys for interveners-defendants herein, and a member of the Bar of the Supreme Court of the United States, certify that on the _____ day of February, 1957, I served copies of the foregoing Motion of Leave to file Intervention, Brief in support of Motion, and Intervenors' Answer by leaving copies thereof at the offices of the Attorney General and of the Solicitor General of the United States, respectively, in the Department of Justice Building, Washington, D. C., and by mailing same to the Attorney General of Louisiana, his office, State Capitol Baton Rouge, La., and to the other attorneys of record for the State of Louisiana at their addresses shown on the State's Answer.

Of Counsel



RESOLUTION

WHEREAS, this Parish will be affected and bound by any final decision rendered by the United States Supreme Court in the suit of the United States vs. the State of Louisiana, No. 11 on the Original Docket of said Court, October Term 1956, and this Parish has the right to intervene in said cause to represent and protect its substantial interests;

THEREFORE:

BE IT RESOLVED by the Police Jury of the Parish of St. Bernard as the Governing Authority of said Parish, that its President, Henry C. Schindler, Jr., be and he is hereby authorized and directed to intervene for and in the name of and on behalf of this Parish in the suit of the United States of America vs. State of Louisiana, No. 11 on the Original Docket of the United States Supreme Court, October Term, 1956, in order to protect the legal rights of this Parish to the full extent of its gulfward boundary, which is co-extensive with the historic boundary of the State of Louisiana as shown by Acts 32 and 33 of the 1934 Louisiana Legislature, and, further, to protect the financial interest of this Parish to its ten percent of the royalties received by the State of Louisiana from mineral production in this Parish under leases granted by the State on State owned lands and property and its portion of the State severance tax collected by the State of Louisiana on its ~~mineral~~ natural resources within the boundaries of this Parish, as provided by Section 21 of Article X and Section 2 of Article IV, respectively, of the State Constitution;

FURTHER RESOLVED that the President of this Police Jury be authorized to cooperate with the other Louisiana Coastal Parishes, their officers and the Legal Committee of the Louisiana Coastal Parishes Organization and the State of Louisiana in the defense of Louisiana's historic boundary, including the gulfward boundary of this Parish.

I HEREBY CERTIFY the above and foregoing to be a true and correct copy of a RESOLUTION unanimously adopted by the St. Bernard Parish Police Jury at a meeting regularly held at Chalmette, La., on January 18, 1957, 1957, with a quorum present and voting in favor thereof:



SECRETARY

RESOLUTION

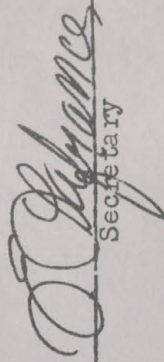
WHEREAS, this Parish will be affected and bound by any final decision rendered by the United States Supreme Court in the suit of the United States versus the State of Louisiana, No. 11 on the Original Docket of said Court, October Term 1956, and this Parish has the right to intervene in said cause to represent and protect its substantial interests;

THEREFORE:

BE IT RESOLVED by the Police Jury of the Parish of Plaquemines as the Governing Authority of said Parish, that its President, Emile Martin, Jr., be and he is hereby authorized and directed to intervene for and in the name of and on behalf of this Parish in the above entitled and numbered cause, in order to protect the legal rights of this Parish to the full extent of its gulfward boundary, which is co-extensive with the historic boundary of the State of Louisiana as shown by Acts 32 and 33 of the 1954 Louisiana Legislature, and, further, to protect the Constitutional interest of this Parish to its ten percent (10%) of the royalties received by the State of Louisiana from mineral production in this Parish under leases granted by the State on State owned lands and property and its portion of the State severance tax collected by the State of Louisiana on its natural resources within the boundaries of this Parish, as provided by Section 21 of Article X and Section 2 of Article IV, respectively, of the State Constitution;

FURTHER RESOLVED, that the President of this Police Jury be authorized to cooperate with the other Louisiana Coastal Parishes, their officers and the Legal Committee of the Louisiana Coastal Parishes Organization, and the State of Louisiana in the defense of Louisiana's historic boundary, including the gulfward boundary of this Parish.

I hereby certify the above and foregoing to be a true and correct copy of a resolution adopted by the Plaquemines Parish Police Jury at a meeting held at Pointe-a-la-Hache, Louisiana, on Wednesday, January 9, 1957.


Secretary

On motion of Mr. Holtgreve, seconded by Mr. Pertuit, the following resolution was adopted:

RESOLUTION

WHEREAS, the legal rights and financial interests of this Parish will be affected by any final decision rendered by the United States Supreme Court in the suit of the UNITED STATES OF AMERICA V. STATE OF LOUISIANA, NO. 11 on the Original Docket of said Court, October Term 1956, and, therefore, this Parish has a right under the Rules of Procedure of said Court to intervene in said cause;

THEREFORE:

BE IT RESOLVED by the Police Jury of the Parish of Jefferson, as the Governing Authority of said Parish, that its President, LeRoy L. Hall, be and he is hereby authorized and directed to intervene for and in the name of and on behalf of this Parish in the suit of the UNITED STATES OF AMERICA V. STATE OF LOUISIANA, NO. 11 on the Original Docket of said Court, October Term 1956, in order to protect the legal rights of this Parish to the full extent of its gulfward boundary, which is co-extensive with the historic boundary of the State of Louisiana as shown by Acts 32 and 33 of the 1954 Louisiana Legislature, and, further, to protect the Constitutional interest of this Parish to its ten percent (10%) of the royalties received by the State of Louisiana from mineral production in this Parish under leases granted by the State on State owned lands and property and its portion of the State severance tax collected by the State of Louisiana on its ~~mineral~~ natural resources within the boundaries of this Parish, as provided by SECTION 21 of ARTICLE X and SECTION 2 of ARTICLE IV, respectively, of the State Constitution;

FURTHER RESOLVED that the President of this Police Jury be authorized to

cooperate with the other Louisiana Coastal Parishes, their officers and the Legal

Committee of the Louisiana Coastal Parishes Organization and the State of Louisiana in the defense of Louisiana's historic boundary, including the gulfward boundary of this Parish.

I HEREBY CERTIFY the above and foregoing to be a true and correct copy of a RESOLUTION unanimously adopted by the Jefferson Parish Police Jury at a meeting regularly held at Gretna, La., on January 9, 1957, with a quorum present and voting in favor thereof:


SECRETARY

Police Jury Iberia Parish



J. K. Darnall
PRESIDENT

MARCUS DE BLANC

SECRETARY AND TREASURER

NEW IBERIA, LA.

AN EXTRACT OF THE MINUTES OF THE POLICE JURY OF IBERIA PARISH, LOUISIANA, TAKEN AT A REGULAR MEETING HELD ON THURSDAY, JANUARY 10, 1957, AT TWO O'CLOCK P. M.

It was moved by Mr. Louis Decuir, seconded by Mr. Robert J. Miranda, and unanimously carried:

WHEREAS, the legal rights and financial interests of this Parish will be affected by any final decision rendered by the United States Supreme Court in the suit of the UNITED STATES OF AMERICA VS. STATE OF LOUISIANA, No. 11 on the Original Docket of said Court, October Term 1956, and, therefore, this Parish has a right under the rules of procedure of said Court to intervene in said cause; THEREFORE:

BE IT RESOLVED by the Police Jury of the Parish of Iberia as the Governing Authority of said Parish, that its President, J.K. Darnall, be and he is hereby authorized and directed to intervene for and in the name of and on behalf of this Parish in the above entitled and numbered cause, in order to protect the legal rights of this Parish to the full extent of its gulfward boundary, which is co-extensive with the historic boundary of the State of Louisiana as shown by Acts 32 and 33 of the 1954 Louisiana Legislature, and, further, to protect the Constitutional interest of this Parish to its ten percent (10%) of the royalties received by the State of Louisiana from mineral production in this Parish under leases granted by the State on State owned lands and property and its portion of the State severance tax collected by the State of Louisiana on its natural resources within the boundaries of this Parish, as provided by SECTION 21 of ARTICLE X and SECTION 2 of ARTICLE IV, respectively, of the State Constitution;

FURTHER RESOLVED that the President of this Police Jury be authorized to cooperate with the other Louisiana Coastal Parishes, their officers and the Legal Committee of the Louisiana Coastal Parishes Organization and the State of Louisiana in the defense of Louisiana's historic boundary, including the gulfward boundary of this Parish.

ATTEST: A true and correct copy of original resolution adopted by the Police Jury of Iberia Parish, at a regular meeting held on Thursday, January 10, 1957.

IN FAITH WHEREOF I have hereunto set my hand and the official seal of the Police Jury of Iberia Parish, this 18th day of January, 1957.

Marcus De Blanc
Secretary-Treasurer, Police Jury of
Iberia Parish, Louisiana.

The following resolution was introduced by Mr. Levy, who moved its adoption; the motion was seconded by Mr. Luke and Mr. Barras and unanimously carried.

RESOLUTION

WHEREAS, the legal rights and financial interests of this Parish will be affected by any final decision rendered by the United States Supreme Court in the suit of the UNITED STATES OF AMERICA VS. STATE OF LOUISIANA, No. 11 on the Original Docket of said Court, October Term 1956, and, therefore, this Parish has a right under the rules of procedure of said Court to intervene in said cause;

THEREFORE, BE IT RESOLVED, by the Police Jury of the Parish of St. Mary as the Governing Authority of said Parish, that its President, Joseph J. Cefalu, be and he is hereby authorized and directed to intervene for and in the name of and on behalf of this Parish in the suit of the UNITED STATES OF AMERICA VS. STATE OF LOUISIANA, No. 11 on the Original Docket of said Court, October Term 1956, in order to protect the legal rights of this Parish to the full extent of its gulfward boundary, which is co-extensive with the historic boundary of the State of Louisiana as shown by Acts 32 and 33 of the 1954 Louisiana Legislature, and, further, to protect the financial interest of this Parish to its ten percent (10%) of the royalties received by the State of Louisiana from mineral production in this Parish under leases granted by the State on State owned lands and property and its portion of the State severance tax collected by the State of Louisiana on its natural resources within the boundaries of this Parish, as provided by SECTION 21 of ARTICLE X and SECTION 2 of ARTICLE IV, respectively, of the State Constitution;

FURTHER RESOLVED that the President of this Police Jury be authorized to cooperate with the other Louisiana Coastal Parishes, their officers and the Legal Committee of the Louisiana Coastal Parishes Organization and the State of Louisiana in the defense of Louisiana's historic boundary, including the gulfward boundary of this Parish.

* * * * *

I, MAY BELLE B. HIEMSTRA, Secretary-Treasurer of the Police Jury of the Parish of St. Mary, hereby certify the above and foregoing to be a true and correct copy of a resolution unanimously adopted by the St. Mary Parish Police Jury at a meeting held at Franklin, Louisiana, on January 9th, 1957, with a quorum present and voting in favor thereof:

Mary Belle B. Hiemstra
MAY BELLE B. HIEMSTRA
SECRETARY-TREASURER
ST. MARY PARISH POLICE JURY

1/15/57



Diagram No. 1.

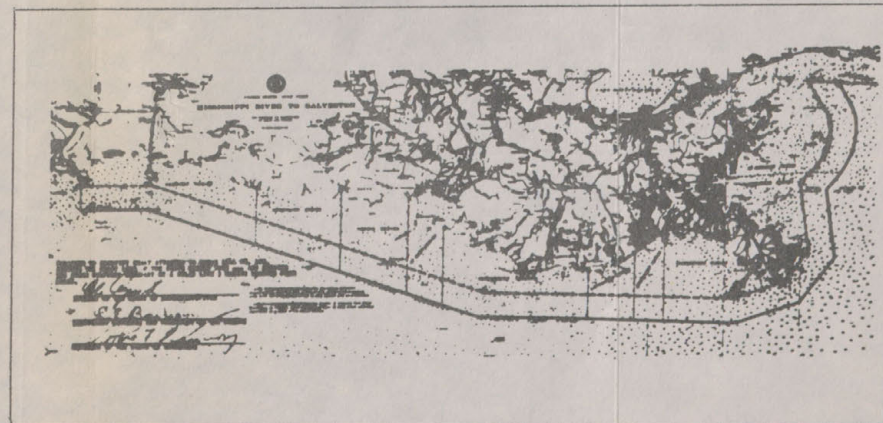
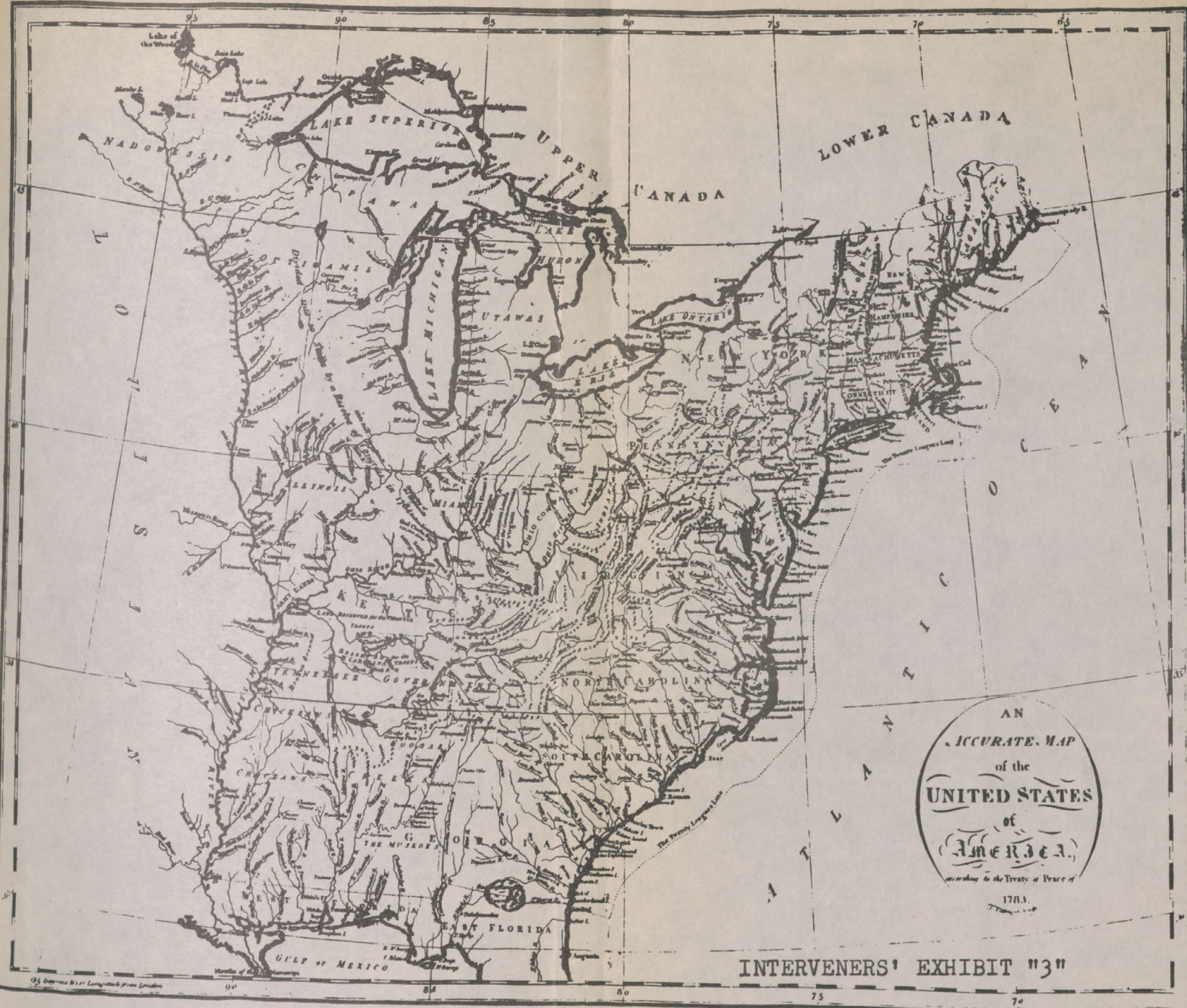


Diagram No. 2.



AN
ACCURATE MAP
of the
UNITED STATES
of
America
according to the Treaty of Peace of
1783.

INTERVENERS' EXHIBIT "3"

ACT # 32

BY: MESSRS. GRAVOLET, GUIDRY,
MERAUX, BEESON, AYCOCK,
SOIGNET, DUPONT, AYCOCK,
GRIZZAFFI, DECUIR,
LANDRY AND DYSON

AN ACT

To define the Gulfward boundary of the coastal Parishes of the State of Louisiana, and to repeal any laws or parts of laws in conflict herewith.

Section 1. Be it enacted by the Legislature of Louisiana, that the Gulfward boundaries of the coastal Parishes of the State of Louisiana situated east of the Mississippi River extend from the outer land terminus of their common boundary due east, true bearing, to the outer Gulfward boundary of the State of Louisiana, and the Gulfward boundaries of the coastal Parishes situated west of the Mississippi River extend from the outer land terminus of their common boundaries due south, true bearing, to the outer Gulfward boundary of the State of Louisiana, and the Gulfward boundary of all said coastal Parishes extend coextensively with the Gulfward boundary of the State of Louisiana.

Section 2. That the interior of inland boundaries of all coastal Parishes shall remain as now existing or fixed by applicable State laws.

Section 3. That all laws or parts of laws in conflict herewith be repealed.

Lele Gaycock

SPEAKER OF THE HOUSE OF REPRESENTATIVES

C. E. Barker

LIEUTENANT GOVERNOR AND PRESIDENT OF THE SENATE

Robert F. Cooney

GOVERNOR OF THE STATE OF LOUISIANA

APPROVED:

21st 1954
at 2:25 P.M.

Certified by the Governor as
Emergency Legislation.

5/27/54
date

Wade O. Martin, Jr.
Secretary of State

INTERVENERS' EXHIBIT "4"

BY: Messrs. Gravolet, Meraux,
Beeson, Guidry, Soignet,
Dupont, Aycock, Grizzaffi,
Peculier, Landry and Dyson

ACT # 23 AN ACT

To amend and re-enact Section 1 of Title 49 of the Louisiana Revised Statutes of 1950 relative to state water boundaries; gulfward boundary.

Whereas, under authority of Section 3 of Article IV of the United States Constitution, the United States Congress admitted Louisiana as a State into the Union in April, 1812, and fixed its gulfward boundary at 3 leagues from coast.

Whereas, in compliance with Acts of Congress of February 10, 1807, 2 Stat. 413, and of February 19, 1895, 28 Stat. 672, 33 U. S. C. 151, the coast line of the State of Louisiana was officially designated and defined by bearings, light-houses, buoys and coast objects, as shown in Section 1 herein;

Whereas, the United States Supreme Court has held that the waters inside of the coast line designated and defined under said Act of February 19, 1895, are "as much a part of the inland waters of the United States within the meaning of this Act as the harbor within the entrance" and another Federal Court held that said Act "was for the purpose of defining the inland waters of the United States."

Whereas, the United States Congress, by its "Tidelands" Act, approved May 22, 1953, 67 Stat. 32, recognized and confirmed State ownership of the lands beneath navigable waters within the State's boundaries, and the natural resources, including oil, gas, and all other minerals, and fish, shrimp, oysters, and other marine animal and plant life within such lands and waters; and said Tidelands Act adopted State boundaries in the Gulf of Mexico as they existed at the time such State became a member of the Union not more than 3 marine leagues into the Gulf of Mexico from the coast line, which "coast line" is defined in said Act as that portion of the coast which is in direct contact with the open sea and the line marking the seaward limit of inland waters; and

Whereas, the State of Louisiana owns these submerged lands and natural resources within such land and waters in trust for its people, and the economic welfare of the State and the public services dependent upon the State revenues to be derived from these valuable natural resources require that the State's historic boundary be redefined to avoid confusion and to clarify the situation with regard thereto.

Be it enacted by the Legislature of Louisiana:

Section 1. Section 1 of Title 49 of the Louisiana Revised Statutes of 1950 is hereby amended and reenacted to read as follows:

§ 1. Gulfward boundary. The historic gulfward boundary of the State of Louisiana extends a distance into the Gulf of Mexico 3 marine leagues from coast.

The coast or coast line of the State of Louisiana is accepted and approved as designated and defined in accordance with applicable Acts of Congress, as follows: From Ship Island Lighthouse to Chandeleuer Lighthouse; thence in a curved line following the general trend of the seaward, high-water shore

lines of the Chandeleuer Islands to the Southwesternmost extremity of Errol Shoal; thence to Pass-a-Loutre lighted whistle buoy 4 to South Pass lighted whistle buoy 2; thence to Southwest Pass entrance midchannel lighted whistle buoy; thence to Ship Shoal lighthouse; thence to Calcasieu Pass lighted whistle buoy 1; thence to Sabine Pass lighted whistle buoy 1, as designated and defined under authority of the Act of Congress of February 19, 1895, 28 Stat. 672, 33 U. S. C. 151 as amended, and as is shown on the attached chart showing the coast line of the State marked thus - - - and showing the State gulfward boundary by a solid line 3 marine leagues from coast, which chart shall be paraphrased by the Speaker of the House of Representatives, the President of the Senate and by the Governor to be identified herewith.

Section 2. That all laws or parts of laws in conflict herewith be and they are hereby repealed with the exception that the designation on the attached plat of the common boundaries of the coastal parishes of the State of Louisiana shall not be taken or interpreted as in any manner changing or affecting the interior or inland boundaries of any said coastal parishes as now existing or fixed by applicable State laws, nor shall said plat be taken or construed, as intending to affect the common maritime boundary between this State and the States of Mississippi and Texas.

Section 3. The Governor having certified to the legislature during the session of the legislature the necessity for the immediate passage of this Act, this Act shall become effective upon approval thereof by the Governor.

W. C. Cyprien
SPEAKER OF THE HOUSE OF REPRESENTATIVES

C. E. Boudreaux
LIEUTENANT GOVERNOR AND PRESIDENT OF THE SENATE

W. C. Cyprien
GOVERNOR OF THE STATE OF LOUISIANA

APPROVED: June 2nd 1954
at 2:26 P.M.

Certified by the Governor as
Emergency Legislation.

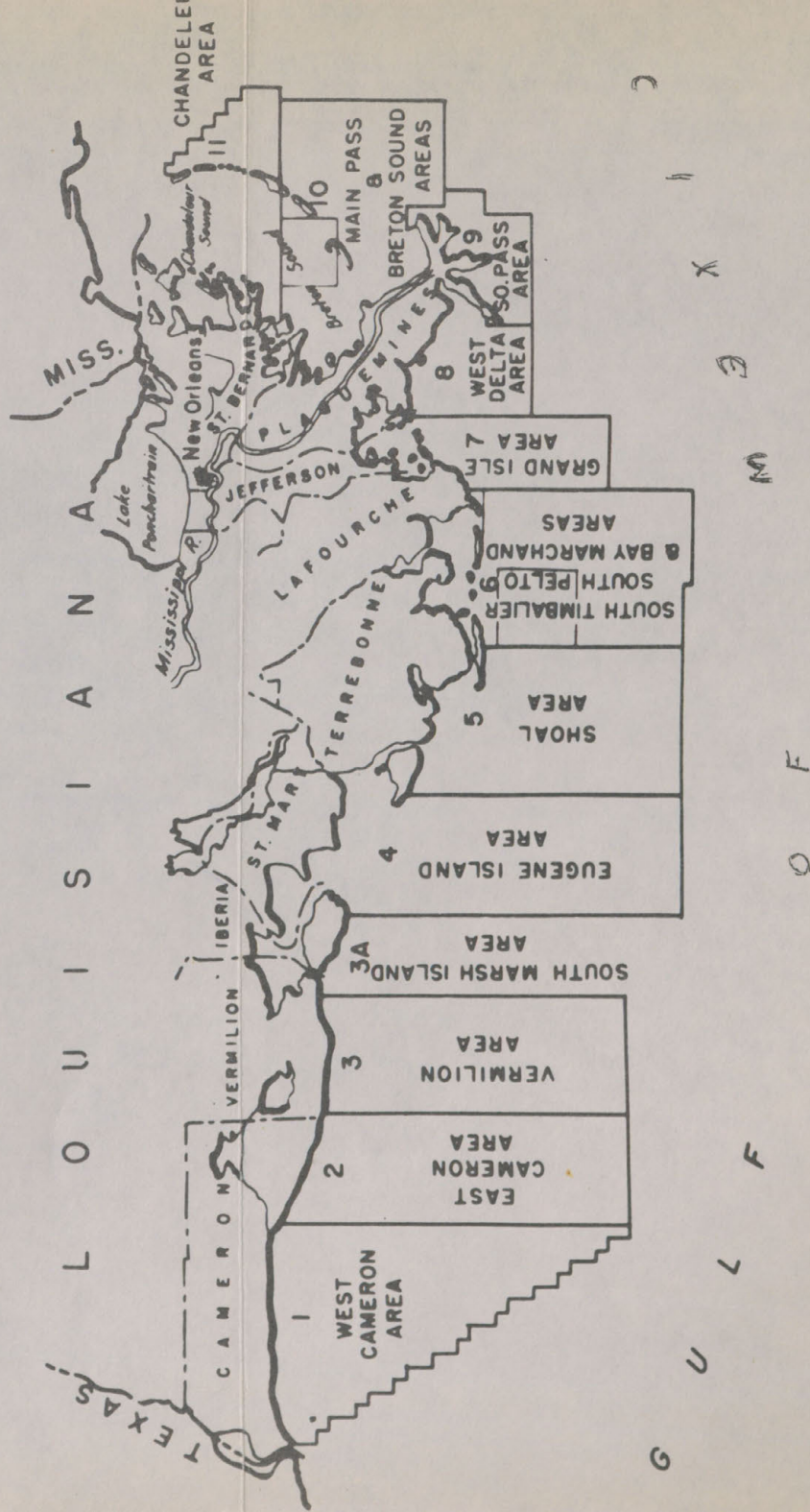
5/27/54
date

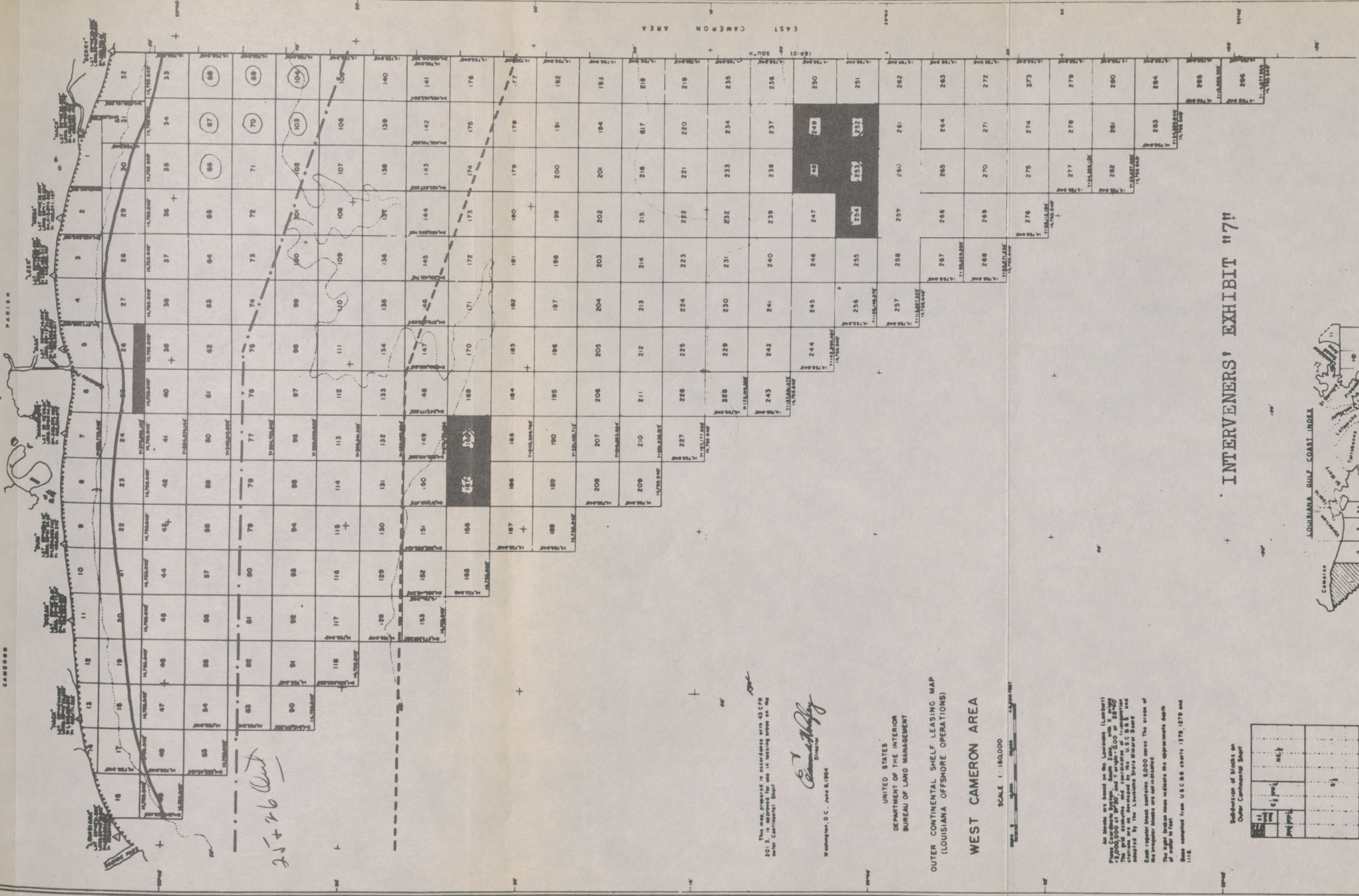
Wade O. Martin, Jr.
Secretary of State

OUTER CONTINENTAL SHELF LEASING MAPS
(LOUISIANA OFFSHORE OPERATIONS)

.....
————
——— · ———

Chapman Coast line
3 mi from Chapman line
Coast line - Act 33
Act 33 - 3 league line





25 + 16 Out

This map, prepared in accordance with USCGS 201.3, is intended for use in leasing areas in the Outer Continental Shelf.

James H. [Signature]
Director

Washington, D. C., June 8, 1984

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
OUTER CONTINENTAL SHELF LEASING MAP
(LOUISIANA OFFSHORE OPERATIONS)

WEST CAMERON AREA

SCALE 1:180,000
NAD 83
UTM
Zone 18N
Datum: NAD 83
Units: Meters

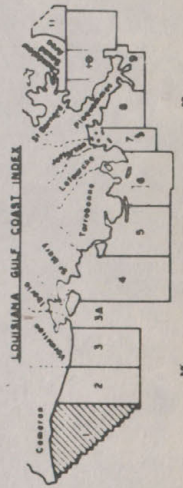
All blocks are based on the Louisiana (Lambert) Projection, Zone 18N, with a scale of 1:180,000. The map is a planimetric representation of the seabed and does not show bathymetry. The seabed is shown as a solid line, and the water column is shown as a dashed line. The map is a planimetric representation of the seabed and does not show bathymetry. The seabed is shown as a solid line, and the water column is shown as a dashed line.

Subdivision of blocks on Outer Continental Shelf

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250
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Special method of subdivision of a block into smaller blocks is shown in the inset map of the West Cameron Area.

INTERVENERS' EXHIBIT "7"



UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

OUTER CONTINENTAL SHELF LEASING MAP
(LOUISIANA OFFSHORE OPERATIONS)

EAST CAMERON AREA

SCALE 1:100,000

MAP 3

39, 53 + 54 Out.

All blocks are based on the Louisiana (Lambert) Plane Coordinate System. Block Zone with 3 degree meridian, 100,000 at 91° 00', and Y origin 0-00 at 29° 00'. The map is based on the U.S.C.B.S. and is adopted by the Louisiana State Mineral Board. Each regular block contains 3,000 acres. The areas of the irregular blocks are as indicated.

The light broken lines indicate the approximate depth of water in feet.

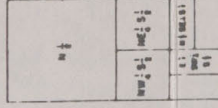
Base compiled from U.S.C.B.S. charts 279 and 1116.

This map, prepared in accordance with 43 CFR 201.3, is approved for use in leasing areas on the Outer Continental Shelf.

Edward M. W. W.
Director

Washington, D.C., June 8, 1954

Subdivision of blocks on
Outer Continental Shelf

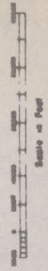


UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

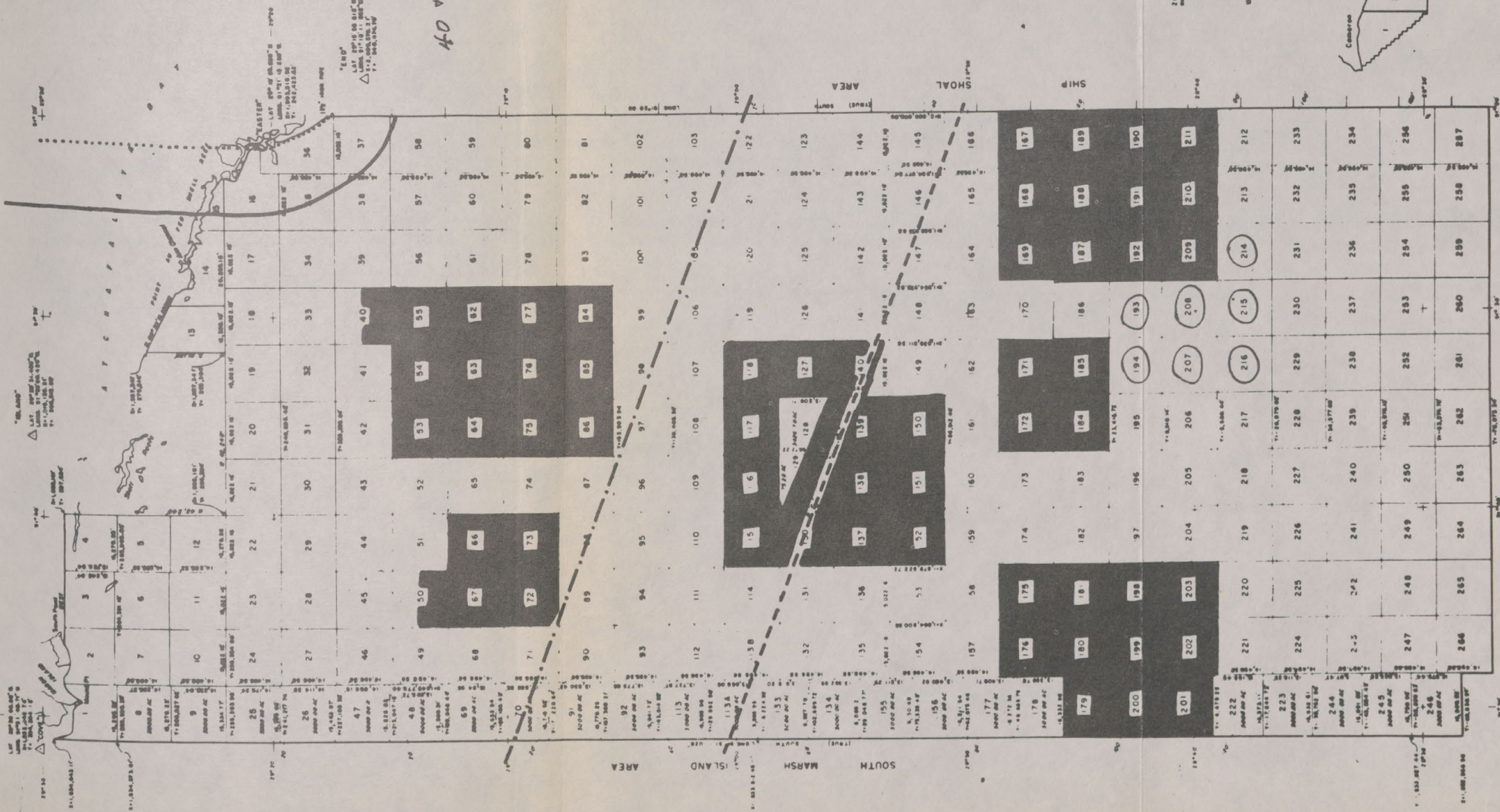
OUTER CONTINENTAL SHELF LEASING (LOUISIANA OFFSHORE OPERATIONS)

EUGENE ISLAND AREA

SCALE 1:160,000



40 + 55 out



All blocks are based on the "National Grid" system. Coordinates are given in feet. The "National Grid" system is based on the "North American Datum of 1983". The "National Grid" system is based on the "North American Datum of 1983". The "National Grid" system is based on the "North American Datum of 1983".

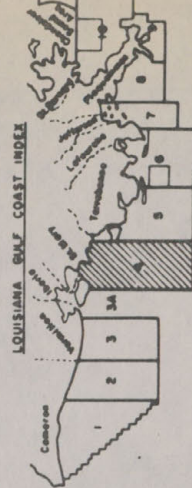
Subdivisions of blocks in Outer Continental Shelf

1/4	1/2	3/4	1	1 1/4	1 1/2	1 3/4	2	2 1/4	2 1/2	2 3/4	3	3 1/4	3 1/2	3 3/4	4	4 1/4	4 1/2	4 3/4	5	5 1/4	5 1/2	5 3/4	6	6 1/4	6 1/2	6 3/4	7	7 1/4	7 1/2	7 3/4	8	8 1/4	8 1/2	8 3/4	9	9 1/4	9 1/2	9 3/4	10	10 1/4	10 1/2	10 3/4	11	11 1/4	11 1/2	11 3/4	12	12 1/4	12 1/2	12 3/4	13	13 1/4	13 1/2	13 3/4	14	14 1/4	14 1/2	14 3/4	15	15 1/4	15 1/2	15 3/4	16	16 1/4	16 1/2	16 3/4	17	17 1/4	17 1/2	17 3/4	18	18 1/4	18 1/2	18 3/4	19	19 1/4	19 1/2	19 3/4	20	20 1/4	20 1/2	20 3/4	21	21 1/4	21 1/2	21 3/4	22	22 1/4	22 1/2	22 3/4	23	23 1/4	23 1/2	23 3/4	24	24 1/4	24 1/2	24 3/4	25	25 1/4	25 1/2	25 3/4	26	26 1/4	26 1/2	26 3/4	27	27 1/4	27 1/2	27 3/4	28	28 1/4	28 1/2	28 3/4	29	29 1/4	29 1/2	29 3/4	30	30 1/4	30 1/2	30 3/4	31	31 1/4	31 1/2	31 3/4	32	32 1/4	32 1/2	32 3/4	33	33 1/4	33 1/2	33 3/4	34	34 1/4	34 1/2	34 3/4	35	35 1/4	35 1/2	35 3/4	36	36 1/4	36 1/2	36 3/4	37	37 1/4	37 1/2	37 3/4	38	38 1/4	38 1/2	38 3/4	39	39 1/4	39 1/2	39 3/4	40	40 1/4	40 1/2	40 3/4	41	41 1/4	41 1/2	41 3/4	42	42 1/4	42 1/2	42 3/4	43	43 1/4	43 1/2	43 3/4	44	44 1/4	44 1/2	44 3/4	45	45 1/4	45 1/2	45 3/4	46	46 1/4	46 1/2	46 3/4	47	47 1/4	47 1/2	47 3/4	48	48 1/4	48 1/2	48 3/4	49	49 1/4	49 1/2	49 3/4	50	50 1/4	50 1/2	50 3/4	51	51 1/4	51 1/2	51 3/4	52	52 1/4	52 1/2	52 3/4	53	53 1/4	53 1/2	53 3/4	54	54 1/4	54 1/2	54 3/4	55	55 1/4	55 1/2	55 3/4	56	56 1/4	56 1/2	56 3/4	57	57 1/4	57 1/2	57 3/4	58	58 1/4	58 1/2	58 3/4	59	59 1/4	59 1/2	59 3/4	60	60 1/4	60 1/2	60 3/4	61	61 1/4	61 1/2	61 3/4	62	62 1/4	62 1/2	62 3/4	63	63 1/4	63 1/2	63 3/4	64	64 1/4	64 1/2	64 3/4	65	65 1/4	65 1/2	65 3/4	66	66 1/4	66 1/2	66 3/4	67	67 1/4	67 1/2	67 3/4	68	68 1/4	68 1/2	68 3/4	69	69 1/4	69 1/2	69 3/4	70	70 1/4	70 1/2	70 3/4	71	71 1/4	71 1/2	71 3/4	72	72 1/4	72 1/2	72 3/4	73	73 1/4	73 1/2	73 3/4	74	74 1/4	74 1/2	74 3/4	75	75 1/4	75 1/2	75 3/4	76	76 1/4	76 1/2	76 3/4	77	77 1/4	77 1/2	77 3/4	78	78 1/4	78 1/2	78 3/4	79	79 1/4	79 1/2	79 3/4	80	80 1/4	80 1/2	80 3/4	81	81 1/4	81 1/2	81 3/4	82	82 1/4	82 1/2	82 3/4	83	83 1/4	83 1/2	83 3/4	84	84 1/4	84 1/2	84 3/4	85	85 1/4	85 1/2	85 3/4	86	86 1/4	86 1/2	86 3/4	87	87 1/4	87 1/2	87 3/4	88	88 1/4	88 1/2	88 3/4	89	89 1/4	89 1/2	89 3/4	90	90 1/4	90 1/2	90 3/4	91	91 1/4	91 1/2	91 3/4	92	92 1/4	92 1/2	92 3/4	93	93 1/4	93 1/2	93 3/4	94	94 1/4	94 1/2	94 3/4	95	95 1/4	95 1/2	95 3/4	96	96 1/4	96 1/2	96 3/4	97	97 1/4	97 1/2	97 3/4	98	98 1/4	98 1/2	98 3/4	99	99 1/4	99 1/2	99 3/4	100	100 1/4	100 1/2	100 3/4	101	101 1/4	101 1/2	101 3/4	102	102 1/4	102 1/2	102 3/4	103	103 1/4	103 1/2	103 3/4	104	104 1/4	104 1/2	104 3/4	105	105 1/4	105 1/2	105 3/4	106	106 1/4	106 1/2	106 3/4	107	107 1/4	107 1/2	107 3/4	108	108 1/4	108 1/2	108 3/4	109	109 1/4	109 1/2	109 3/4	110	110 1/4	110 1/2	110 3/4	111	111 1/4	111 1/2	111 3/4	112	112 1/4	112 1/2	112 3/4	113	113 1/4	113 1/2	113 3/4	114	114 1/4	114 1/2	114 3/4	115	115 1/4	115 1/2	115 3/4	116	116 1/4	116 1/2	116 3/4	117	117 1/4	117 1/2	117 3/4	118	118 1/4	118 1/2	118 3/4	119	119 1/4	119 1/2	119 3/4	120	120 1/4	120 1/2	120 3/4	121	121 1/4	121 1/2	121 3/4	122	122 1/4	122 1/2	122 3/4	123	123 1/4	123 1/2	123 3/4	124	124 1/4	124 1/2	124 3/4	125	125 1/4	125 1/2	125 3/4	126	126 1/4	126 1/2	126 3/4	127	127 1/4	127 1/2	127 3/4	128	128 1/4	128 1/2	128 3/4	129	129 1/4	129 1/2	129 3/4	130	130 1/4	130 1/2	130 3/4	131	131 1/4	131 1/2	131 3/4	132	132 1/4	132 1/2	132 3/4	133	133 1/4	133 1/2	133 3/4	134	134 1/4	134 1/2	134 3/4	135	135 1/4	135 1/2	135 3/4	136	136 1/4	136 1/2	136 3/4	137	137 1/4	137 1/2	137 3/4	138	138 1/4	138 1/2	138 3/4	139	139 1/4	139 1/2	139 3/4	140	140 1/4	140 1/2	140 3/4	141	141 1/4	141 1/2	141 3/4	142	142 1/4	142 1/2	142 3/4	143	143 1/4	143 1/2	143 3/4	144	144 1/4	144 1/2	144 3/4	145	145 1/4	145 1/2	145 3/4	146	146 1/4	146 1/2	146 3/4	147	147 1/4	147 1/2	147 3/4	148	148 1/4	148 1/2	148 3/4	149	149 1/4	149 1/2	149 3/4	150	150 1/4	150 1/2	150 3/4	151	151 1/4	151 1/2	151 3/4	152	152 1/4	152 1/2	152 3/4	153	153 1/4	153 1/2	153 3/4	154	154 1/4	154 1/2	154 3/4	155	155 1/4	155 1/2	155 3/4	156	156 1/4	156 1/2	156 3/4	157	157 1/4	157 1/2	157 3/4	158	158 1/4	158 1/2	158 3/4	159	159 1/4	159 1/2	159 3/4	160	160 1/4	160 1/2	160 3/4	161	161 1/4	161 1/2	161 3/4	162	162 1/4	162 1/2	162 3/4	163	163 1/4	163 1/2	163 3/4	164	164 1/4	164 1/2	164 3/4	165	165 1/4	165 1/2	165 3/4	166	166 1/4	166 1/2	166 3/4	167	167 1/4	167 1/2	167 3/4	168	168 1/4	168 1/2	168 3/4	169	169 1/4	169 1/2	169 3/4	170	170 1/4	170 1/2	170 3/4	171	171 1/4	171 1/2	171 3/4	172	172 1/4	172 1/2	172 3/4	173	173 1/4	173 1/2	173 3/4	174	174 1/4	174 1/2	174 3/4	175	175 1/4	175 1/2	175 3/4	176	176 1/4	176 1/2	176 3/4	177	177 1/4	177 1/2	177 3/4	178	178 1/4	178 1/2	178 3/4	179	179 1/4	179 1/2	179 3/4	180	180 1/4	180 1/2	180 3/4	181	181 1/4	181 1/2	181 3/4	182	182 1/4	182 1/2	182 3/4	183	183 1/4	183 1/2	183 3/4	184	184 1/4	184 1/2	184 3/4	185	185 1/4	185 1/2	185 3/4	186	186 1/4	186 1/2	186 3/4	187	187 1/4	187 1/2	187 3/4	188	188 1/4	188 1/2	188 3/4	189	189 1/4	189 1/2	189 3/4	190	190 1/4	190 1/2	190 3/4	191	191 1/4	191 1/2	191 3/4	192	192 1/4	192 1/2	192 3/4	193	193 1/4	193 1/2	193 3/4	194	194 1/4	194 1/2	194 3/4	195	195 1/4	195 1/2	195 3/4	196	196 1/4	196 1/2	196 3/4	197	197 1/4	197 1/2	197 3/4	198	198 1/4	198 1/2	198 3/4	199	199 1/4	199 1/2	199 3/4	200	200 1/4	200 1/2	200 3/4	201	201 1/4	201 1/2	201 3/4	202	202 1/4	202 1/2	202 3/4	203	203 1/4	203 1/2	203 3/4	204	204 1/4	204 1/2	204 3/4	205	205 1/4	205 1/2	205 3/4	206	206 1/4	206 1/2	206 3/4	207	207 1/4	207 1/2	207 3/4	208	208 1/4	208 1/2	208 3/4	209	209 1/4	209 1/2	209 3/4	210	210 1/4	210 1/2	210 3/4	211	211 1/4	211 1/2	211 3/4	212	212 1/4	212 1/2	212 3/4	213	213 1/4	213 1/2	213 3/4	214	214 1/4	214 1/2	214 3/4	215	215 1/4	215 1/2	215 3/4	216	216 1/4	216 1/2	216 3/4	217	217 1/4	217 1/2	217 3/4	218	218 1/4	218 1/2	218 3/4	219	219 1/4	219 1/2	219 3/4	220	220 1/4	220 1/2	220 3/4	221	221 1/4	221 1/2	221 3/4	222	222 1/4	222 1/2	222 3/4	223	223 1/4	223 1/2	223 3/4	224	224 1/4	224 1/2	224 3/4	225	225 1/4	225 1/2	225 3/4	226	226 1/4	226 1/2	226 3/4	227	227 1/4	227 1/2	227 3/4	228	228 1/4	228 1/2	228 3/4	229	229 1/4	229 1/2	229 3/4	230	230 1/4	230 1/2	230 3/4	231	231 1/4	231 1/2	231 3/4	232	232 1/4	232 1/2	232 3/4	233	233 1/4	233 1/2	233 3/4	234	234 1/4	234 1/2	234 3/4	235	235 1/4	235 1/2	235 3/4	236	236 1/4	236 1/2	236 3/4	237	237 1/4	237 1/2	237 3/4	238	238 1/4	238 1/2	238 3/4	239	239 1/4	239 1/2	239 3/4	240	240 1/4	240 1/2	240 3/4	241	241 1/4	241 1/2	241 3/4	242	242 1/4	242 1/2	242 3/4	243	243 1/4	243 1/2	243 3/4	244	244 1/4	244 1/2	244 3/4	245	245 1/4	245 1/2	245 3/4	246	246 1/4	246 1/2	246 3/4	247	247 1/4	247 1/2	247 3/4	248	248 1/4	248 1/2	248 3/4	249	249 1/4	249 1/2	249 3/4	250	250 1/4	250 1/2	250 3/4	251	251 1/4	251 1/2	251 3/4	252	252 1/4	252 1/2	252 3/4	253	253 1/4	253 1/2	253 3/4	254	254 1/4	254 1/2	254 3/4	255	255 1/4	255 1/2	255 3/4	256	256 1/4	256 1/2	256 3/4	257	257 1/4	257 1/2	257 3/4	258	258 1/4	258 1/2	258 3/4	259	259 1/4	259 1/2	259 3/4	260	260 1/4	260 1/2	260 3/4	261	261 1/4	261 1/2	261 3/4	262	262 1/4	262 1/2	262 3/4	263	263 1/4	263 1/2	263 3/4	264	264 1/4	264 1/2	264 3/4	265	265 1/4	265 1/2	265 3/4	266	266 1/4	266 1/2	266 3/4	267	267 1/4	267 1/2	267 3/4	268	268 1/4	268 1/2	268 3/4	269	269 1/4	269 1/2	269 3/4	270	270 1/4	270 1/2	270 3/4	271	271 1/4	271 1/2	271 3/4	272	272 1/4	272 1/2	272 3/4	273	273 1/4	273 1/2	273 3/4	274	274 1/4	274 1/2	274 3/4	275	275 1/4	275 1/2	275 3/4	276	276 1/4	276 1/2	276 3/4	277	277 1/4	277 1/2	277 3/4	278	278 1/4	278 1/2	278 3/4	279	279 1/4	279 1/2	279 3/4	280	280 1/4	280 1/2	280 3/4	281	281 1/4	281 1/2	281 3/4	282	282 1/4	282 1/2	282 3/4	283	283 1/4	283 1/2	283 3/4	284	284 1/4	284 1/2	284 3/4	285	285 1/4	285 1/2	285 3/4	286	286 1/4	286 1/2	286 3/4	287	287 1/4	287 1/2	287 3/4	288	288 1/4	288 1/2	288 3/4	289	289 1/4	289 1/2	289 3/4	290	290 1/4	290 1/2	290 3/4	291	291
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This map prepared in accordance with 43 CFR 20.3, is approved for use in testing areas on the outer Continental Shelf

Edmund M. ...
Director

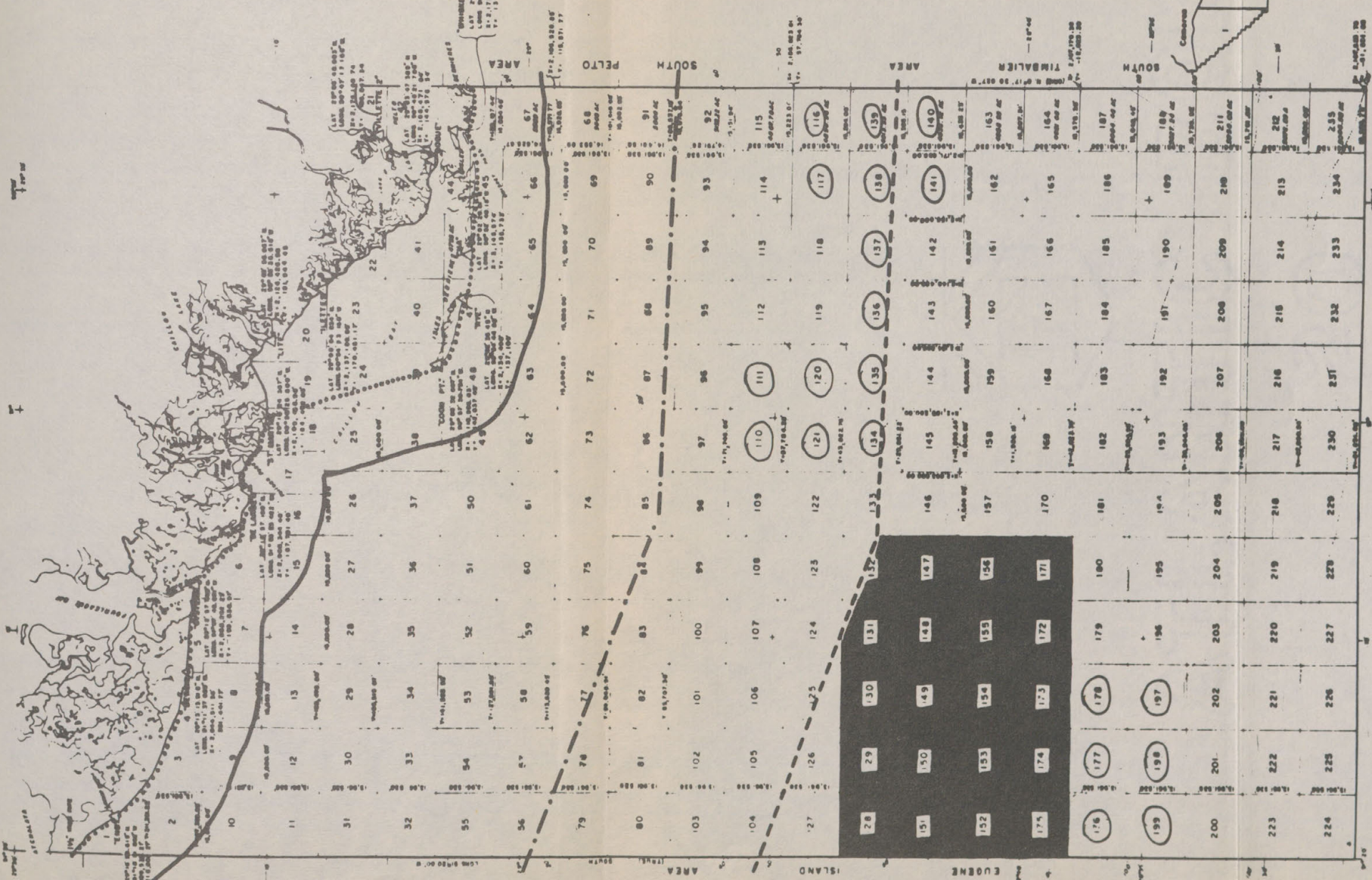
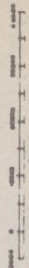
Washington, D.C., June 9, 1954



UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
OUTER CONTINENTAL SHELF LEASING MAP
(LOUISIANA OFFSHORE OPERATIONS)

SHIP SHOAL AREA

SCALE 1:50,000



All blocks are based on the Louisiana (Lebanon) Plane Coordinates system with origin at 29°50' 00" N, 90°00' 00" W. The grid extends to 29°50' 00" N, 90°00' 00" W and 29°50' 00" N, 90°00' 00" W. The grid is based on the Louisiana State Survey of 1954. The grid is based on the Louisiana State Survey of 1954. The grid is based on the Louisiana State Survey of 1954.

This map was prepared in accordance with 43 U.S.C. 1331, 1332, 1333, and 1334, and is subject to the Outer Continental Shelf Act.

Comptroller
DIRECTOR

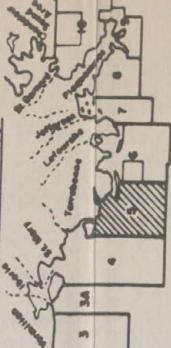
Washington, D.C., June 8, 1954

Subdivision of blocks on Outer Continental Shelf

Block No.	Area (Acres)	Subdivision
1-10	100	100
11-20	100	100
21-30	100	100
31-40	100	100
41-50	100	100
51-60	100	100
61-70	100	100
71-80	100	100
81-90	100	100
91-100	100	100

Typed method of subdivision of the blocks, with subdivisions being on a grid pattern, is shown on the map.

LOUISIANA GULF COAST INDEX



INTERVENERS' EXHIBIT "11"

This map prepared in accordance with 48 CFR 201.2 is approved for use in leasing areas on the outer Continental Shelf.

Edward W. Hays
Director

Washington, D. C., June 9, 1964

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

OUTER CONTINENTAL SHELF
LEASING MAP
(LOUISIANA OFFSHORE OPERATIONS)

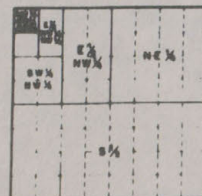
SOUTH TIMBALIER
SOUTH PELTO AND
BAY MARCHAND
AREAS

SCALE 1:100,000

0 10 20 30 40 50 60 70 80 90 100 FEET

NOTES: All blocks are based on the Louisiana (Land-Grant) Plane Coordinate System, South Zone, with X origin = 8,000,000 at 97°00' and Y origin = 0.00 at 29°40'. The grid azimuths and coordinates of triangulation stations are as developed by the U. S. C. & G. S. and adopted by the Louisiana State Mineral Board. Each regular block contains 5000 acres. The areas of the irregular blocks are as indicated. Blocks computed from U. S. C. & G. S. charts 1110, 673 and 1276. The light broken lines indicate the approximate depth of water in feet.

SUBDIVISION OF BLOCKS
ON THE
OUTER CONTINENTAL SHELF



Typical method of subdivision of the blocks, each subdivision being an aliquot part of the total, based on midpoint subdivision throughout.



Typical method of subdivision of irregular blocks along the outer boundary of South Timbalier Area, each subdivision being an aliquot part of the total based on midpoint subdivision throughout.

LOUISIANA GULF COAST INDEX



INTERVENERS' EXHIBIT "12"

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

OUTER CONTINENTAL SHELF LEASING MAP
(LOUISIANA OFFSHORE OPERATIONS)

WEST DELTA AREA

SCALE 1" = 60,000'

5000 0 5000 10000 20000 30000 40000
1 1 1 1 1 1
Scale in feet

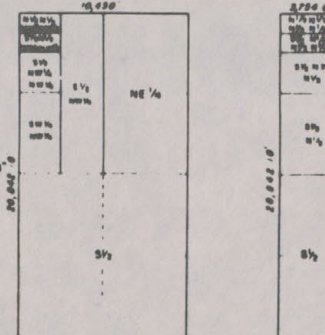
All blocks are based on the Louisiana (Lambert) Plane Coordinate System, South Zone, with X origin at 2,000,000 and Y origin at 0.00. The grid azimuths and coordinates of triangulation stations are as developed by the U.S.C. & G.S. and adopted by the Louisiana State Mineral Board.

Each regular block contains 5,000 acres. The areas of the irregular blocks are as indicated.

The light broken lines indicate the approximate depth of water in feet.

Base compiled from U.S.C. & G.S. charts 1272 & 1273.

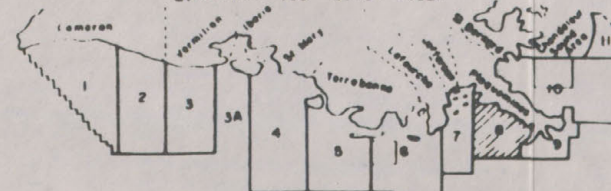
Subdivision of blocks on Outer Continental Shelf



Typical method of subdivision of the regular blocks, each subdivision being an aliquot part of the total, based on midpoint subdivision throughout.

Typical method of subdivision of the irregular blocks, each subdivision being an aliquot part of the total, based on midpoint subdivision throughout.

LOUISIANA GULF COAST INDEX



This map, prepared in accordance with 43 CFR 211.5, is approved for use in leasing areas on the Outer Continental Shelf.

Edward H. Hargis
Map 1115

Washington, D.C., June 8, 1954

INTERVENERS' EXHIBIT "13"