No. 9, Original

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1966

UNITED STATES OF AMERICA,
Plaintiff

v.

STATE OF LOUISIANA, TEXAS, ET AL.,
Defendants

SUPPLEMENTAL DECREE PROPOSED BY THE STATE OF TEXAS AND MEMORANDUM IN SUPPORT OF PROPOSED SUPPLEMENTAL DECREE

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STATE OF LOUISIANA, TEXAS, ET AL.,
Defendants

SUPPLEMENTAL DECREE PROPOSED BY THE STATE OF TEXAS

For the purpose of giving effect to the conclusions of this Court as stated in its opinion announced December 4, 1967, supplementing the decree entered herein on December 12, 1960, it is ordered, adjudged and decreed as follows:

1. As against the State of Texas, the United States is entitled to all the lands, minerals and other natural resources underlying the Gulf of Mexico that are seaward from the point or line described as follows:

Beginning at a point on the international boundary with Mexico, three marine leagues gulfward from the point x = 2,447, 717, y = 104,830 (South Zone), latitude 25° 56′ 54.30″ N., longitude 97° 08′ 15.50″ W., and proceeding thence northwardly and eastwardly as follows:

	Course	South Zone x	South Zone y	Latitude	Longitude
1.	By arc centered at	2,447,033	105,994	25°57'05.90"	97°08'22.85"
	to	2,498,223	125,226	26 00 10.59	96 58 59.59
2.	By straight line to	2,498,068	126,760	26 00 25.80	96 59 01.09
3.	By arc centered at	2,443,661	121,256	25 59 37.4	97 08 58.0
	to	2,497,383	131,474	26 01 12.56	96 59 07.98
4.	By straight line to	2,497,076	135,704	26 01 54.49	96 59 10.78
5.	By straight line to	2,497,119	137,947	26 02 16.70	96 59 10.02
6.	By straight line to	2,497,240	139,652	26 02 33.58	96 59 08.47
7.	By arc centered at	2,442,693	143,530	26 03 18.1	97 09 06.0
	to	2,496,942	150,421	26 04 20.26	96 59 10.32
8.	By straight line to	2,496,723	152,145	26 04 37.36	96 59 12.50
9.	By arc centered at	2,442,474	145,254	26 03 35.2	97 09 08.2
	to	2,496,370	154,510	26 05 00.83	96 59 16.06
10.	By straight line to	2,495,553	159,267	26 05 48.04	96 59 24.39
11.	By arc centered at	2,441,657	150,011	26 04 22.4	97 09 16.6
	to	2,495,161	161,316	26 06 08.37	96 59 28.42
12.	By straight line to	2,494,875	162,668	26 06 21.79	96 59 31.38
13.	By straight line to	2,494,746	163,636	26 06 31.39	96 59 32.67
14.	By straight line to	2,492,451	182,957	26 09 43.01	96 59 55.32
15.	By arc centered at	2,438,148	176,509	26 08 45.2	97 09 52.0
	to	2,492,330	183,907	26 09 52.44	96 59 56.52
16.	By straight line to	2,490,612	196,490	26 11 57.26	97 00 13.74
17.	By arc centered at	2,436,430	189,092	26 10 50.0	97 10 09.4
	to	2,490,574	196,764	26 11 59.99	97 00 14.12
18.	By straight line to	2,488,714	209,890	26 14 10.20	97 00 32.84
19.	By arc centered at	2,434,570	202,218	26 13 00.2	97 10 28.3
	to	2,488,423	211,722	26 14 28.37	97 00 35.80
20.	By straight line to	2,486,399	223,191	26 16 22.20	97 00 56.54
21.	By arc centered at	2,432,546	213,687	26 14 54.0	97 10 49.2
	to	2,486,322	223,615	26 16 26.40	97 00 57.33
22.	By straight line to	2,484,084	235,738	26 18 26.73	97 01 20.36
23.	By arc centered at	2,430,308	225,810	26 16 54.3	97 11 12.4
	to	2,483,535	238,353	26 18 52.69	97 01 26.05
24.	By straight line to	2,478,947	257,823	26 22 06.05	97 02 13.99
25.	By arc centered at	2,425,720	245,280	26 20 07.6	97 12 00.6
	to	2,478,775	258,531	26 22 13.09	97 02 15.79
26.	By straight line to	2,475,739	270,687	26 24 13.83	97 02 47.63
27.	By arc centered at	2,422,684	257,436	26 22 08.3	97 12 32.6
	to	2,475,708	270,811	26 24 15.06	97 02 47.96
28.	By straight line to	2,472,116	285,051	26 26 36.50	97 03 25.67
29.	By arc centered at	2,419,092	271,676	26 24 29.7	97 13 10.5
	to	2,471,287	287,990	26 27 05.71	97 03 34.42
30.	By straight line to	2,466,585	303,033	26 29 35.22	97 04 24.28
31.	By straight line to	2,461,419	319,706	26 32 20.92	97 05 19.08

	Course	South Zone x	South Zone y	Latitude	Longitude
32.	By arc centered at	2,409,184	303,522	26 29 46.1	97 14 56.0
	to	2,461,209	320,369	26 32 27.52	97 05 21.31
33.	By straight line to	2,450,926	352,124	26 37 43.15	97 07 10.71
34.	By arc centered at	2,398,901	335,277	26 35 01.6	97 16 45.8
	to	2,449,710	355,498	26 38 16.70	97 07 23.71
35.	By straight line to	2,447,122	362,000	26 39 21.38	97 07 51.45
36.	By straight line to	2,445,524	366,527	26 40 06.38	97 08 08.52
37.	By straight line to	2,442,108	376,994	26 41 50.42	97 08 44.95
38.	By straight line to	2,437,787	392,060	26 44 20.08	97 09 30.~~82~~
39.	By straight line to	2,437,079	394,740	26 44 46.70	97 09 38.~~90~~
40.	By arc centered at	2,384,205	380,784	26 42 33.7	97 19 23.0
	to	2,435,953	398,463	26 45 23.70	97 09 50.30
41.	By straight line to	2,435,511	399,759	26 45 36.57	97 09 55.03
42.	By straight line to	2,432,474	410,567	26 47 23.94	97 10 27.28
43.	By straight line to	2,427,617	431,540	26 50 52.15	97 11 18.47
44.	By straight line to	2,424,278	447,618	26 53 31.73	97 11 53.51
45.	By straight line to	2,422,538	459,109	26 55 25.72	97 12 11.42
46.	By arc centered at	2,368,469	450,923	26 54 09.8	97 22 09.6
	to	2,422,177	461,213	26 55 46.59	97 12 15.17
47.	By straight line to	2,421,519	468,580	26 56 11.43	97 12 22.16
48.	By arc centered at	2,367,051	463,714	26 56 16.6	97 22 24.0
	to	2,421,383	469,914	26 57 12.85	97 12 22.95
49.	By straight line to	2,420,872	474,392	26 57 57.25	97 12 28.09
50.	By arc centered at	2,366,540	468,192	26 57 01.0	97 22 29.2
	to	2,420,613	476,347	26 58 16.64	97 12 30.73
51.	By straight line to	2,419,889	487,832	27 00 10.46	97 12 37.44
52.	By straight line to	2,419,593	493,822	27 01 09.82	97 12 40.04
53.	By straight line to	2,419,571	498,661	27 01 57.74	97 12 39.73
54.	By arc centered at	2,364,887	498,418	27 02 00.5	97 22 44.5
	to	2,419,564	499,351	27 02 04.57	97 12 39.74
55.	By straight line to	2,419,442	506,501	27 03 15.40	97 12 40.28
56.	By straight line to	2,419,750	514,047	27 04 30.10	97 12 36.02
57.	By straight line to	2,419,951	517,831	27 05 07.56	97 12 33.36
58.	By straight line to	2,420,165	521,009	27 05 39.01	97 12 30.64
59.	By arc centered at	2,365,603	524,676	27 06 20.5	97 22 34.0
	to	2,420,260	522,916	27 05 57.88	97 12 29.38
60.	By straight line to	2,420,367	526,247	27 06 30.86	97 12 27.81
61.	By straight line to	2,421,336	538,406	27 08 31.18	97 12 15.70
62.	By arc centered at	2,366,824	542,751	27 09 19.4	97 22 18.7
	to	2,421,429	539,789	27 08 44.87	97 12 14.52
63.	By straight line to	2,421,449	540,167	27 08 48.61	97 12 14.25
64.	By straight line to	2,421,591	540,986	27 08 56.71	97 12 12.59
65.	By arc centered at	2,367,705	550,301	27 10 34.1	97 22 08.2
	to	2,422,109	544,769	27 09 34.13	97 12 06.42

	Course	South Zone x	South Zone y	Latitude	Longitude
66.	By straight line to	2,422,522	548,828	27 10 14.28	97 12 01.39
67.	By straight line to	2,422,909	550,953	27 10 35.28	97 11 56.86
68.	By arc centered at	2,369,110	560,755	27 12 17.5	97 21 51.6
	to	2,423,074	551,906	27 10 44.71	97 11 54.92
69.	By straight line to	2,423,600	555,114	27 11 16.42	97 11 48.73
70.	By straight line to	2,425,604	565,501	27 12 59.09	97 11 25.35
71.	By straight line to	2,425,955	567,201	27 13 15.88	97 11 21.27
72.	By straight line to	2,430,188	585,397	27 16 15.65	97 10 32.26
73.	By straight line to	2,435,271	602,898	27 19 08.44	97 09 33.87
74.	By straight line to	2,437,860	611,265	27 20 31.02	97 09 04.17
75.	By straight line to	2,440,773	619,882	27 21 56.05	97 08 30.84
76.	By straight line to	2,443,622	627,687	27 23 13.04	97 07 58.31
77.	By straight line to	2,449,412	641,292	27 25 27.14	97 06 52.41
78.	By straight line to	2,455,945	656,139	27 27 53.45	97 05 38.08
79.	By straight line to	2,459,158	662,847	27 28 59.52	97 05 01.59
80.	By straight line to	2,460,858	666,346	27 29 33.99	97 04 42.27
81.	By arc centered at	2,419,058	701,605	27 35 27.6	97 12 22.4
	to	2,468,926	679,163	27 31 40.01	97 03 11.05
82.	By straight line to	2,473,113	688,467	27 33 11.66	97 02 23.35
83.	By arc centered at	2,423,245	710,909	27 36 59.3	97 11 34.8
	to	2,477,118	701,518	27 35 20.43	97 01 37.17
84.	By straight line to	2,477,226	701,748	27 35 22.70	97 01 35.93
85.	By straight line to	2,484,830	715,453	27 37 37.53	97 00 09.62
86.	By straight line to	2,492,830	728,654	27 39 47.30	96 58 38.91
87.	By straight line to	2,503,178	744,730	27 42 25.23	96 56 41.63
88.	By straight line to	2,511,491	757,057	27 44 26.26	96 55 07.44
89.	By straight line to	2,515,272	762,240	27 45 17.11	96 54 24.63
90.	By arc centered at	2,471,092	794,467	27 50 41.5	97 02 32.2
	to	2,522,680	776,327	27 47 35.66	96 53 00.17
91.	By straight line to	2,523,498	778,651	27 47 58.57	96 52 50.74
92.	By straight line to	2,523,986	779,631	27 48 08.21	96 52 45.16
93.	By straight line to	2,526,031	782,992	27 48 41.29	96 52 22.00
94.	By straight line to	2,535,804	796,133		

South Central Zone

(Repeating two courses)

93.	By straight line to	2,687,786	—1,695		
94.	By straight line to	2,697,492	11,498	27 50 50.13	96 50 31.25
95.	By straight line to	2,705,230	21,472	27 52 27.43	96 49 03.01
96.	By straight line to	2,710,958	28,002	27 53 31.00	96 47 57.84
97.	By arc centered at	2,669,848	64,063	27 59 35.4	96 55 28.7
	to	2,712,719	30,115	27 53 51.59	96 47 37.77
98.	By straight line to	2,714,852	32,807	27 54 17.84	96 47 13.45
99.	By straight line to	2,720,377	38,910	27 55 17.21	96 46 10.59

	Course	South Zone x	South Zone y	Latitude	Longitude
100.	By straight line to	2,724,705	43,579	27 56 02.60	96 45 21.36
101.	By straight line to	2,727,377	46,418	27 56 30.20	96 44 50.97
102.	By arc centered at	2,691,713	87,873	28 03 27.2	96 51 20.0
	to	2,733,517	52,619	27 57 30.40	96 43 41.20
103.	By straight line to	2,745,287	64,045	27 59 21.23	96 41 27.48
104.	By straight line to	2,759,114	76,842	28 01 25.17	96 38 50.43
105.	By straight line to	2,760,917	78,432	28 01 40.55	96 38 29.96
106.	By straight line to	2,775,278	90,137	28 03 33.53	96 35 47.09
107.	By straight line to	2,780,827	94,573	28 04 16.30	96 34 44.15
108.	By arc centered at	2,746,685	137,290	28 11 26.0	96 40 55.7
	to	2,782,550	96,009	28 04 30.16	96 34 24.59
109.	By straight line to	2,783,852	97,140	28 04 41.08	96 34 09.80
110.	By straight line to	2,791,476	102,789	28 05 35.43	96 32 43.40
111.	By straight line to	2,800,074	109,137	28 06 36.47	96 31 05.92
112.	By straight line to	2,807,482	114,230	28 07 25.32	96 29 42.01
113.	By straight line to	2,814,202	118,283	28 08 04.00	96 28 26.00
114.	By arc centered at	2,785,963	165,112	28 15 53.5	96 33 30.4
	to	2,815,384	119,016	28 08 11.01	96 28 12.63
115.	By straight line to	2,824,561	124,874	28 09 07.01	96 26 28.73
116.	By straight line to	2,831,319	128,676	28 09 43.18	96 25 12.32
117.	By straight line to	2,836,670	131,276	28 10 07.75	96 24 11.92
118.	By straight line to	2,839,197	132,254	28 10 16.87	96 23 43.45
119.	By arc centered at	2,819,460	183,253	28 18 46.0	96 27 11.5
	to	2,840,053	132,594	28 10 20.04	96 23 33.80
120.	By straight line to	2,844,564	134,428	28 10 37.20	96 22 42.95
121.	By straight line to	2,846,278	135,087	28 10 43.34	96 22 23.64
122.	By arc centered at	2,833,368	188,226	28 19 32.2	96 24 34.7
	to	2,864,032	142,947	28 11 57.16	96 19 03.31
123.	By straight line to	2,865,389	143,866	28 12 05.95	96 18 47.92
124.	By arc centered at	2,834,725	189,145	28 19 41.0	96 24 19.3
	to	2,879,517	157,775	28 14 20.38	96 16 06.44
125.	By straight line to	2,880,106	158,616	28 14 28.57	96 15 59.64
126.	By arc centered at	2,835,314	189,986	28 19 49.2	96 24 12.5
	to	2,883,104	163,406	28 15 15.29	96 15 24.87
127.	By straight line to	2,885,158	167,099	28 15 51.36	96 15 00.94
128.	By arc centered at	2,837,368	193,679	28 20 25.3	96 23 48.6
	to	2,886,819	170,332	28 16 22.99	96 14 41.53
129.	By straight line to	2,890,783	177,022	28 17 28.27	96 13 55.43
130.	By arc centered at	2,843,740	204,903	28 22 15.0	96 22 34.5
	to	2,893,218	181,614	28 18 13.16	96 13 26.99
131.	By straight line to	2,899,374	187,032	28 19 05.34	96 12 16.69
132.	By straight line to	2,908,291	193,515	28 20 07.38	96 10 35.21
133.	By straight line to	2,912,716	196,355	28 20 34.44	96 09 44.93
134.	By straight line to	2,927,833	205,781	28 22 04.08	96 06 53.21

	Course	South Zone x	South Zone y	Latitude	Longitude
135.	By straight line to	2,936,888	211,198	28 22 55.48	96 05 10.38
136.	By straight line to	2,950,886	219,194	28 24 11.14	96 02 31.45
137.	By straight line to	2,961,311	224,721	28 25 03.23	96 00 33.18
138.	By straight line to	2,978,776	233,372	28 26 24.39	95 57 15.13
139.	By straight line to	2,987,582	237,367	28 27 01.65	95 55 35.35
140.	By arc centered at	2,964,991	287,167	28 35 20.4	95 59 34.0
	to	2,988,795	237,935	28 27 06.96	95 55 21.60
141.	By straight line to	2,998,740	242,743	28 27 51.95	95 53 28.80
142.	By straight line to	3,002,406	244,493	28 28 08.31	95 52 47.22
143.	By straight line to	3,005,833	246,002	28 28 22.33	95 52 08.38
144.	By arc centered at	2,983,797	296,051	28 36 43.5	95 56 00.5
	to	3,007,526	246,783	28 28 29.61	95 51 49.18
145.	By straight line to	3,026,416	255,881	28 29 54.60	95 48 14.81
146.	By arc centered at	3,002,687	305,149	28 38 08.6	95 52 25.9
	to	3,028,326	256,847	28 30 03.64	95 47 53.12
147.	By straight line to	3,047,657	267,108	28 31 39.91	95 44 13.33
148.	By arc centered at	3,022,018	315,410	28 39 45.0	95 48 45.9
	to	3,048,496	267,563	28 31 44.18	95 44 03.79
149.	By straight line to	3,059,100	273,431	28 32 39.31	95 42 03.10
150.	By arc centered at	3,032,622	321,278	28 40 40.2	95 46 45.1
	to	3,060,936	274,494	28 32 49.32	95 41 42.19
151.	By straight line to	3,078,889	285,359	28 34 31.79	95 38 17.46
152.	By arc centered at	3,050,575	332,143	28 42 22.8	95 43 20.2
	to	3,080,687	286,496	28 34 42.53	95 37 56.93
153.	By straight line to	3,084,317	288,890	28 35 05.20	95 37 15.45
154.	By straight line to	3,092,292	293,735	28 35 50.86	95 35 44.46
155.	By arc centered at	3,063,896	340,470	28 43 41.5	95 40 48.0
	to	3,092,642	293,950	28 35 52.89	95 35 40.46
156.	By straight line to	3,110,764	305,148	28 37 38.45	95 32 13.53
157.	By arc centered at	3,082,018	351,668	28 45 27.2	95 37 20.9
	to	3,111,027	305,312	28 37 39.99	95 32 10.52
158.	By straight line to	3,128,977	316,545	28 39 25.86	95 28 45.39
159.	By arc centered at	3,099,968	362,901	28 47 13.2	95 33 55.6
	to	3,129,951	317,169	28 39 31.75	95 28 34.25
160.	By straight line to	3,152,081	331,678	28 41 48.68	95 24 20.95
161.	By arc centered at	3,122,098	377,410	28 49 30.3	95 29 42.1
	to	3,153,769	332,830	28 41 59.57	95 24 01.60
162.	By straight line to	3,158,904	336,478	28 42 34.10	95 23 02.71
163.	By straight line to	3,168,664	342,866	28 43 34.32	95 21 10.91
164.	By arc centered at	3,138,717	388,622	28 51 16.3	95 26 31.5
	to	3,172,530	345,644	28 44 00.62	95 20 26.53
165.	By straight line to	3,177,771	349,049	28 44 32.69	95 19 26.48
166.	By arc centered at	3,147,981	394,907	28 52 15.7	95 24 45.2

	Course	South Zone x	y	Latitude	Longitude
	to	3,178,426	349,481	28 44 36.76	95 19 18.9
167.	By straight line to	3,184,351	353,452	28 45 14.21	95 18 11.04
168.	By arc centered at	3,153,906	398,878	28 52 53.2	95 23 37.2
	to	3,185,298	354,101	28 45 20.34	95 18 00.17
169.	By straight line to	3,196,291	361,808	28 46 33.16	95 15 53.96
170.	By arc centered at	3,164,899	406,585	28 54 06.1	95 21 30.9
	to	3,197,099	362,386	28 46 38.61	95 15 44.67
171.	By straight line to	3,203,248	366,865	28 47 21.00	95 14 33.99
172.	By straight line to	3,205,264	368,190	28 47 33.46	95 14 10.87
173.	By arc centered at	3,182,950	418,115	28 55 54.6	95 18 03.8
	to	3,213,259	372,598	28 48 14.53	95 12 39.45
174.	By straight line to	3,214,103	373,160	28 48 19.82	95 12 29.76
175.	By arc centered at	3,183,794	418,677	28 55 59.9	95 17 54.1
	to	3,230,736	390,625	28 51 07.29	95 09 16.44
176.	By straight line to	3,240,421	399,503	28 52 31.99	95 07 24.26
177.	By straight line to	3,258,176	414,679	28 54 56.30	95 03 58.91
178.	By straight line to	3,262,578	418,206	28 55 29.73	95 03 08.07
179.	By straight line to	3,266,484	420,949	28 55 55.57	95 02 23.08
180.	By arc centered at	3,239,802	468,683	29 03 56.8	95 07 05.4
	to	3,282,040	433,949	28 57 58.97	94 59 23.10
181.	By straight line to	3,282,364	434,343	28 58 02.76	94 59 19.30
182.	By arc centered at	3,240,126	469,077	29 04 00.6	95 07 01.6
	to	3,290,005	446,661	29 00 02.05	94 57 48.53
183.	By straight line to	3,296,652	452,104	29 00 53.63	94 56 31.59
184.	By straight line to	3,302,419	456,606	29 01 36.20	94 55 24.90
185.	By straight line to	3,315,160	466,352	29 03 08.22	94 52 57.60
186.	By straight line to	3,320,930	470,564	29 03 47.89	94 51 50.94
187.	By straight line to	3,328,195	475,602	29 04 35.19	94 50 27.11
188.	By straight line to	3,342,587	484,679	29 05 59.91	94 47 41.32
189.	By arc centered at	3,313,417	530,934	29 13 47.9	94 52 51.6
	to	3,345,594	486,717	29 06 19.02	94 47 06.62
190.	By straight line to	3,350,192	490,063	29 06 50.48	94 46 13.45
191.	By arc centered at	3,318,015	534,280	29 14 19.4	94 51 58.4
	to	3,351,664	491,173	29 07 00.94	94 45 56.41
192.	By straight line to	3,366,438	502,706	29 08 49.73	94 43 05.18
193.	By straight line to	3,373,759	508,167	29 09 41.10	94 41 40.41
194.	By arc centered at	3,341,062	552,000	29 17 06.6	94 47 31.2
	to	3,376,113	510,025	29 09 58.63	94 41 13.09
195.	By straight line to	3,379,502	512,855	29 10 25.40	94 40 33.71
196.	By arc centered at	3,344,451	554,830	29 17 33.4	94 46 51.8
	to	3,382,463	515,517	29 10 50.64	94 39 59.22
197.	By straight line to	3,385,938	518,877	29 11 22.61	94 39 18.63
198.	By arc centered at	3,347,926	558,190	29 18 05.4	94 46 11.2
	to	3,393,316	527,691	29 12 47.10	94 37 51.73

	Course	South Zone x	South Zone y	Latitude	Longitude
199.	By straight line to	3,394,123	528,892	29 12 58.69	94 37 42.12
200.	By arc centered at	3,348,733	559,391	29 18 17.0	94 46 01.6
	to	3,399,047	537,969	29 14 26.68	94 36 42.74
201.	By straight line to	3,399,847	539,848	29 14 44.97	94 36 32.92
202.	By arc centered at	3,349,533	561,270	29 18 35.3	94 45 51.8
	to	3,401,544	544,379	29 15 29.17	94 36 11.86
203.	By straight line to	3,402,301	546,710	29 15 51.96	94 36 02.32
204.	By arc centered at	3,350,290	563,601	29 18 58.1	94 45 42.3
	to	3,404,498	556,395	29 17 26.97	94 35 33.41
205.	By straight line to	3,404,679	557,758	29 17 40.38	94 35 30.79
206.	By straight line to	3,405,303	558,363	29 17 46.13	94 35 23.49
207.	By straight line to	3,407,136	559,951	29 18 01.16	94 35 02.12
208.	By straight line to	3,409,314	561,570	29 18 16.36	94 34 36.85
209.	By straight line to	3,413,751	564,517	29 18 43.86	94 33 45.50
210.	By straight line to	3,421,690	569,297	29 19 28.16	94 32 13.83
211.	By straight line to	3,429,293	573,476	29 20 06.63	94 30 46.17
212.	By straight line to	3,447,430	582,437	29 21 28.35	94 27 17.47
213.	By straight line to	3,466,717	591,592	29 22 51.47	94 23 35.58
214.	By arc centered at	3,443,267	640,994	29 31 09.3	94 27 38.8
	to	3,467,072	591,762	29 22 53.01	94 23 31.50
215.	By straight line to	3,480,531	598,270	29 23 52.12	94 20 56.55
216.	By straight line to	3,497,178	605,998	29 25 01.98	94 17 44.98
217.	By arc centered at	3,474,153	655,599	29 33 21.8	94 21 42.9
	to	3,497,492	606,145	29 25 03.31	94 17 41.36
218.	By straight line to	3,512,863	613,399	29 26 08.92	94 14 44.35
219.	By arc centered at	3,489,524	662,853	29 34 27.5	94 18 45.7
	to	3,513,624	613,765	29 26 12.24	94 14 35.58
220.	By straight line to	3,530,376	621,990	29 27 26.82	94 11 22.44
221.	By straight line to	3,554,680	633,780	29 29 13.49	94 06 42.17
222.	By arc centered at	3,530,811	682,981	29 37 30.0	94 10 49.1
	to	3,555,470	634,171	29 29 17.03	94 06 33.05
223.	By straight line to	3,571,673	642,357	29 30 31.26	94 03 25.94
224.	By straight line to	3,579,924	646,355	29 31 07.35	94 01 50.72
225.	By arc centered at	3,564,669	698,869	29 39 53.2	94 04 18.2
	to	3,583,947	647,695	29 31 18.91	94 01 04.58
226.	By arc centered at	3,570,700	700,751	29 40 09.3	94 03 09.0
	to	3,583,971	647,701	29 31 18.96	94 01 04.31
227.	By arc centered at	3,585,544	702,363	29 40 19.0	94 00 20.1
	to	3,587,641	647,718	29 31 17.58	94 00 22.79
228.	By arc centered at	3,588,465	702,397	29 40 18.1	93 59 47.0
	to	3,597,166	648,409	29 31 20.37	93 58 34.73
229.	By arc centered at	3,598,298	703,082	29 40 20.7	93 57 55.3
	to	3,611,182	649,936	29 31 29.50	93 55 55.45
230.	By arc centered at	3,616,758	704,337	29 40 25.2	93 54 25.6

	Course	South Zone x	South Zone y	Latitude	Longitude
	to	3,617,980	649,666	29 31 23.90	93 54 38.73
231.	By straight line to	3,622,052	649,757	29 31 23.04	93 53 52.62
232.	By straight line to	3,628,661	649,851	29 31 21.11	93 52 37.85
233.	By arc centered at	3,627,884	704,530	29 40 22.3	93 52 19.5
	to	3,632,508	650,041	29 31 21.32	93 51 54.24
234.	By straight line to	3,634,971	650,250	29 31 22.32	93 51 26.29
235.	By arc centered at	3,630,347	704,739	29 40 23.3	93 51 51.5
	to	3,651,368	654,256	29 31 54.77	93 48 18.84
236.	By straight line to	3,653,430	655,115	29 32 02.36	93 47 55.08
237.	By arc centered at	3,632,410	705,598	29 40 30.9	93 51 27.7
	to	3,663,602	660,681	29 32 52.93	93 45 57.22
238.	By straight line to	3,664,862	661,556	29 33 01.02	93 45 42.53
239.	By arc centered at	3,633,670	706,473	29 40 39.0	93 51 13.0
	to	3,677,669	664,000	29 34 58.40	93 43 11.30
240.	By straight line to	3,678,810	675,546	29 35 13.18	93 42 57.60
241.	By arc centered at	3,634,811	708,019	29 40 53.8	93 50 59.3
	to	3,680,595	678,115	29 35 37.80	93 42 36.08
242.	By straight line to	3,686,069	686,496	29 36 58.24	93 41 29.83

The State of Texas is not entitled to any interest in such lands, minerals or resources, and said State its privies, assigns, lessees and other persons claiming under it are hereby enjoined from interfering with the rights of the United States in such lands, minerals and resources.

2. As against the United States, with the exceptions provided by § 5 of the Submerged Lands Act, 43 U.S.C. §1313, the State of Texas is entitled to all the lands, minerals and other natural resources underlying the Gulf of Mexico bounded on the south by the international boundary with Mexico and on the east by the western boundary of Louisiana and an extension thereof, that are landward of the line described in paragraph 1 hereof.

3. As used herein—

(a) "Geographical mile" means a distance of

1852 meters (6076.10333 . . . U.S. Survey Feet or approximately 6076.11549 International Feet);

(b) "Marine league" means a distance of three geographical miles;

(c) Plane coordinates refer to the Texas Coordinate Systems, South Zone or South Central Zone, as indicated.

(d) Latitudes and longitudes refer to the North American 1927 Datum.

(e) All distances referred to herein are expressed at grid scale, Texas Plane Coordinate Systems.

4. The Court retains jurisdiction to entertain such further proceedings, enter such orders, and issue such writs as may from time to time be deemed necessary or advisable to give proper force and effect to this decree, or to the decree of December 12, 1960, herein, or to effectuate the rights of the parties in the premises.

IN THE

SUPREME COURT OF THE UNITED STATES

OCTOBER TERM, 1966

No. 9, Original

UNITED STATES OF AMERICA,
Plaintiff

v.

STATE OF LOUISIANA, TEXAS, ET AL.,
Defendants

MEMORANDUM IN SUPPORT OF PROPOSED SUPPLEMENTAL DECREE

Although proposed decrees have been separately prepared by the respective parties hereto in response to the direction of the Court in its opinion rendered herein on December 4, 1967, agreement has been reached by said parties regarding the location of the fixed historical gulfward boundary of the State of Texas at the time Texas became a member of the Union (December 29, 1845), as reflected by the stiplation between the United States of America and the State of Texas and duly executed on behalf of said parties by the legal representatives thereof, which stipulation has been filed with the papers of the captioned cause.

The sole point of disagreement between the parties appears to be whether the aforementioned gulfward

boundary of the State of Texas should remain fixed under the provisions of the Submerged Lands Act and the opinion of this Honorable Court, which is the position of the State of Texas, or whether, under the provisions of the Submerged Lands Act, the gulfward boundary of the State of Texas is not necessarily fixed but becomes ambulatory anytime the coast line of Texas recedes from the coast line as it existed in 1845, which is the position of the United States.

The State of Texas believes that the position of the United States flies in the face of the majority opinion of the Court and is categorically opposed to the intent and overt meaning of the Submerged Lands Act.

As determined by the Court, Texas was given "that amount of submerged land it owned when it entered the Union" (majority opinion, page 5). Therefore, "the Congressional grant to Texas of *nine* (3) marine leagues of submerged land is measured by the historic State boundaries 'as they existed' in 1845 when Texas was admitted to the Union" (majority opinion, page 6).

In reaching its decision the Court looked to the definition of the term, "boundaries," found in Section 2(b) of the Submerged Lands Act passed on May 22, 1953, the relevant portion of which is as follows:

> "The term 'boundaries' includes the seaward boundaries of a state or its boundaries in the Gulf of Mexico . . . as they existed at the time such State became a member of the Union. . . ."

Thus, the aforementioned phrase, "boundaries in the Gulf of Mexico . . . as they existed," to which the majority turned for reasoning, would appear to mean simply "as a line or seaward limit existed in 1845."

Such an interpretation of the majority opinion seems to be reflected in the dissent (page 2) wherein Mr. Justice Harlan refers to the majority's "assumption that the statutory term 'as it existed' was intended to freeze Texas' seaward boundary . . . as of 1845. . . ."

Notwithstanding the foregoing language taken from the majority opinion and the aforementioned reference to the dissent's interpretation thereof, the United States presently takes the position that the State of Texas cannot claim three marine leagues of submerged land "measured by the historic State boundaries 'as they existed' in 1845 when Texas was admitted to the Union" because the Texas coast line has generally receded subsequent to 1845, as evidenced by a joint Federal-State project. To maintain such a position, the United States looks to additional language in Section 2(b) of the Submerged Lands Act and, this State believes, falls into either or both errors of (1) reading the language out of context or (2) supplying an additional word which never appears in Section 2(b) of the Act. The particular language upon which the United States bases its position is merely as follows:

> ". . . but in no event shall the term 'boundaries' . . . be interpreted as extending from the coast line more than . . . three marine leagues into the Gulf of Mexico."

The United States would add the word "present" in front of "coast line" to make this explanatory language read: ". . . as extending from the *present* coast line," which would in fact result in a denial to the State of Texas of its full three marine leagues of submerged land as measured by the historic State boundaries as they existed in 1845 when Texas was admitted

into the Union simply because the Texas coast line has receded subsequent to 1845.

Not only would the word "present" have to be so added in order to arrive at such a meaning, but the foregoing explanatory language would have to be read completely out of context, since the language does in fact appear as an integral part of the definition of a state's boundaries as being the boundaries which existed "at the time such State became a member of the Union, or as heretofore approved by the Congress."

Moreover, the inequity of the United States' position is readily apparent when considering the result of a coast line advancing into the Gulf since 1845, by virtue of either accretion or reliction, or a receding coast line caused by erosion along the Texas coast line subsequent to 1845. If, through accretion or reliction along the coast line of Texas subsequent to 1845, three marine leagues from the present coast line now reaches gulfward beyond the three leagues distance from the historic coast line of 1845, the seaward boundary of Texas would still remain three marine leagues from the historic coast line. This, the State of Texas believes, is within the meaning of the majority opinion. If, however, according to the United States' position, where changes subsequent to 1845 result in erosion along the Texas coast line, as has apparently occurred, Texas can no longer claim its historic boundary of 1845, but must give up the area beyond three marine leagues from the present coast line. Therefore, not only would the State of Texas gain nothing from accretion or reliction along its coast line subsequent to 1845, but it would also lose, under the United States' contention, a portion of its historic tidelands in the event of subse-

quent erosion. This, the State of Texas believes, is not the meaning of the majority opinion of the Court, which, this State submits, clearly sets the seaward boundary of Texas as a stable line measured by historic conditions at the time Texas joined the Union.

Also, the confusing consequences of the United States' position are readily apparent when considering the result of a coast line suffering from erosion subsequent to 1845, which, as aforesaid, has apparently taken place along the Texas coast. According to the contention of the United States, whenever the ever-changing coast line lies inland from the historic coast line of 1845, the seaward boundary of Texas becomes ambulatory following the changes that occur in the coast line itself, which the State of Texas believes, is clearly a situation the majority of the Court was undertaking to avoid and which, Texas further believes, is not within the meaning of the Submerged Lands Act.

Furthermore, such a situation would work havoc with any kind of orderly mineral development along the periphery of the Texas seaward boundary because lessees would never know with whom they should deal. Title to royalty interests under leased properties might in fact change hands between the United States and Texas time and time again during the life of a single lease both before and after commencement of production. It is not difficult to foresee an unending chain of litigation between the United States and Texas involving title to oil and gas produced under properties subject to innumerable changes in ownership. The myriad of questions and problems resulting from such a fluid situation is unforeseeable.

A thorough reading of the Submerged Lands Act,

especially the defining Sections 2(b) and 2(c), appears to the State of Texas to clearly reflect that the definitions of the term "boundaries" and "coast lines" in no way limit a State's seaward boundary to less than three marine leagues from shore if seaward boundaries of the state extended three marine leagues at the time such state became a member of the Union.

A thorough reading of the majority opinion of the Court evidences the same conclusion, as reflected by the following quotations from the opinion:

> "No new State boundary is being created, but a State which qualifies simply is given the *same area it had* when it entered the Union." (emphasis added) (majority opinion, page 5)
>
> ". . . Texas has simply been given that amount of submerged land it owned when it entered the Union." (majority opinion, page 5)
>
> "Thus, we hold today that the congressional grant to Texas of *nine* (3) marine leagues of submerged land is measured by the historical state boundaries 'as they existed' in 1845 when Texas was admitted to the Union." (majority opinion page 6)

The State of Texas therefore submits that the position of the United States is untenable and in direct conflict with the majority opinion of the Court and the language of the Submerged Lands Act, by virtue of which the State of Texas says that the seaward boundary of Texas is and will forever be "as it existed" at the time Texas became a member of the Union.

The State of Texas further submits that the aforesaid conflict is of such significance that oral argument is desirable and therefore respectfully requests a hear-

ing regarding proposed decrees before the Honorable Court.

Respectfully submitted,

CRAWFORD C. MARTIN
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Assistant Attorney General

July 12, 1968

CERTIFICATE

I, A. J. Carubbi, Jr., Executive Assistant Attorney General of Texas, a member in good standing of the Bar of the Supreme Court of the United States, hereby certify that on the 12th day of July 1968, I served copies of the foregoing Supplemental Decree proposed by the State of Texas and Memorandum in support thereof, either in person or by mail, postage prepaid, to the office of the Attorney General and of the Solicitor General of the United States, respectively, in the Department of Justice Building, Washington, D. C., and to the Attorneys General of the States of Alabama, Florida, Louisiana and Mississippi respectively.

A. J. CARRUBI, JR.