

NOV 29 1974

MICHAEL RODAK, JR., CLERK

No. 9, Original

In the
Supreme Court of the United States
OCTOBER TERM, 1974

UNITED STATES OF AMERICA,
Plaintiff,
v.
STATE OF LOUISIANA, ET AL.,
Defendants.

APPENDICES II AND III TO THE EXCEPTIONS
OF THE STATE OF LOUISIANA TO THE REPORT
OF THE SPECIAL MASTER FILED JULY 31,
1974, AND BRIEF IN SUPPORT OF EXCEPTIONS

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State of Louisiana.

APPENDIX II

Part 1

Index to transcript references and to depositions in the proceeding before Walter P. Armstrong, Jr., Special Master	1
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Part 2

Index to the evidence introduced by the State of Louisiana in the proceeding before Walter P. Armstrong, Jr., Special Master	7
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Part 3

Index to the evidence introduced by the United States in the proceeding before Walter P. Armstrong, Jr., Special Master..	159
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APPENDIX III

Closing Line contentions of the State of Louisiana including point to point description	215
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OCTOBER TERM 1974

UNITED STATES OF AMERICA,
Plaintiff,

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STATE OF LOUISIANA, ET AL.,
Defendants.

APPENDIX II, Part 1

INDEX TO TRANSCRIPT REFERENCES AND
TO DEPOSITIONS IN THE PROCEEDING
BEFORE WALTER P. ARMSTRONG, JR.,
SPECIAL MASTER

TRANSCRIPT

INDEX OF APPEARANCE OF WITNESSES

IN NEW ORLEANS

<i>Witness</i>	<i>Volume No.</i>	<i>Pages No.</i>
Dr. James P. Morgan	I	34-149 ¹
	II	150-283 ¹
	III	287-425 ¹
	IV	426-446 ¹
		447-559 ²
	V	561-639 ²

¹ Direct

² Cross

		640-647 ³
		648-652 ⁴
Dr. George H. Lowery, Jr.	V	653-699 ¹
	VI	701-711 ¹
		712-740 ²
		740-744 ³
		744-746 ⁴
Mr. Allan Ensminger	VI	756-802 ¹
		803-811 ²
		812-817 ³
Mr. Joseph Lawrence Billiot	VI	817-831 ¹
		832-841 ²
Dr. Leo Bouchez	VII	864-078 ¹
	VIII	979-995 ¹
		996-1103 ²
Mr. J. Y. Christmas	VIII	1109-1122 ¹
	IX	1124-1142 ¹
		1143-1160 ²
Mr. John Lay	IX	1161-1210 ¹
		1211-1242 ²
Mr. Richard Yancey	IX	1244-1260 ¹
		1261-1263 ²
Mr. Jack Hood	IX	1269-1284 ¹
Mr. Ory Poret	X	1476-1492 ¹
	XI	1496-1529 ¹
		1530-1571 ²
Mr. Hatley Harrison, Jr.	XI	1578-1604 ¹
	XII	1611-1633 ¹
		1633-1704 ²
	XIII	1707-1725 ²
Dr. Lyle S. St. Amant	XIII	1729-1742 ¹
		1742-1746 ²
		1746-1747 ³

³ Redirect

⁴ Recross

Dr. John Loos	XIII	1748-1812 ¹
	XIV	1816-1845 ¹
		1845-1855 ²
		1855-1859 ³
Mr. Curtis L. Buttorff	XIV	1871-1950 ¹
	XV	1977-2034 ¹
	XVI	2060-2081 ¹
		2081-2178 ²
	XVII	2185-2274 ²
		2275-2289 ³
		2289-2298 ⁴
Mr. Leo W. Hough	XVI	2040-2050 ¹
Dr. James P. Morgan	XVIII	2325-2441 ¹
	XX	2646-2770 ¹
	XXI	2775-2904 ¹
	XXII	2907-2960 ¹
		2961-3034 ²
	XXIII	3038-3165 ²
	XXIV	3169-3209 ²
	XXIV	3217-3224 ¹
Dr. Alexander Melamid		3224-3237 ⁵
		3237-3283 ¹
	XXV	3292-3337 ¹
		3337-3413 ²
	XXV	3414-3420 ¹
Mr. Philip Larimore	XXVI	3424-3558 ¹
	XXVII	3586-3629 ¹
		3629-3694 ²
Mr. David Morgan	XXVIII	3715-3814 ¹
	XIX	3833-3877 ¹
		3880-3926 ²
		3929-3938 ²
Mr. Philip L. Whitaker	XXX	3945-4047 ¹
		4047-4064 ²

⁵ Traverse

Mr. Lindsay P. Peperone	XXX	4081-4091 ¹ 4091-4094 ² 4094-4095 ³
Mr. Francis Zimmerman	XXXI	4132-4179 ¹ 4179-4183 ²
Mr. John L. Rankin	XXXI	4184-4212 ¹ 4212-4217 ²

IN WASHINGTON, D.C.

Mr. Arthur I. Cooperman	XXXII	4265-4287 ¹
Comm. R. Lawrence Swanson	XXXII	4287-4330 ¹ 4330-4351 ² 4351-4353 ³
Mr. Bennett G. Jones	XXXII XXXIII	4353-4365 ¹ 4413-4449 ¹ 4449-4476 ² 4476-4484 ³
Mr. Harland R. Cravat	XXXIII XXXV	4485-4521 ¹ 4556-4623 ¹ 4624-4650 ² 4650-4655 ³ 4655-4656 ⁴ 4657 ⁶ 4657 ⁷
Mr. Joseph K. Wilson	XXXV	4665-4676 ¹ 4676-4677 ²
Dr. Charles R. Kolb	XXXV XXXVI	4678-4692 ¹ 4698-4759 ¹
Dr. Roger T. Saucier	XXXVI	4759-4811 ¹ 4812-4843 ²
Mr. Buford K. Meade	XXXVII XXXVII	4853-4867 ¹ 4867-4879 ² 4879-4881 ³

⁶ Further redirect

⁷ Further recross

		4882-4884 ⁴
		4884 ⁶
Dr. Louis Henkin	XXXVII	4887-4927 ¹
		4927-4939 ²
Mr. Donald J. Simon	XXXVII	4939-4943 ¹
		4943-4947 ²
Mr. James F. Richardson	XXXVII	4947-5004 ¹
	XXXVIII	5035-5037 ¹
		5037-5114 ²
		5114-5121 ³
Mr. Rupert B. Southard	XXXVIII	5122-5131 ¹
	XXXIX	5140-5219 ¹
		5219-5251 ²
Dr. Robert D. Hodgson	XXXIX	5251-5285 ¹
	XL	5300-5451 ¹
	XLI	5454-5516 ²
		5516-5551 ³

IN BATON ROUGE

Mr. Philip B. Larimore	XLII	5572-5722 ¹
	XLIII	5731-5824 ²
		5828-5835 ²
Mr. Curtis Buttorff	XLIII	5836-5887 ¹
		5887-5908 ²
	XLIV	5918-5952 ²
Mr. David J. Morgan	XLIV	5954-6080 ¹
		6081-6128 ²
	XLV	6132-6204 ²
Dr. James P. Morgan	XLV	6206-6364 ¹
	XLVI	6365-6399 ²

DEPOSITIONS

Mr. James F. Richardson	La. Exh. 123
Dr. A. Joseph Wraight	La. Exh. 123
Mr. Samuel J. Nunez	La. Exh. 145, also introduced as La. Exh. 55, tab 195
Mr. Chin Dy Hoy	La. Exh. 146, also introduced as La. Exh. 55, tab 197
Mr. Abraham Schouest	La. Exh. 147, also introduced as La. Exh. 55, tab 198
Capt. Emanuel Von Lubbe	La. Exh. 148, also introduced as La. Exh. 55, tab 194
Mr. Landry Cheramie	La. Exh. 149, also introduced as La. Exh. 55, tab 196
Mr. Bennett G. Jones	U.S. Exhs. 268A and 268B
Mr. Gordon Atwater	U. S. Exh. 269
Mr. Newton Beauvais	U.S. Exh. 270
Cmdr. R. Lawrence Swanson	U.S. Exh. 417

APPENDIX II, Part 2
INDEX TO THE EVIDENCE INTRODUCED
BY THE STATE OF LOUISIANA IN THE
PROCEEDING BEFORE WALTER P.
ARMSTRONG, JR., SPECIAL MASTER

- Exhibit 1** Vita of Dr. James P. Morgan
- Exhibit 2** LPI 837. Official map of Louisiana, 1969 edition showing geological areas.
- Exhibit 3** LPI 1141. Charles G. Holle, *Sedimentation at the Mouth of the Mississippi River*, in PROCEEDINGS OF SECOND CONFERENCE ON COASTAL ENGINEERING, p. 111 (J. W. Johnson ed. 1951).
- Exhibit 4** J. P. Morgan, *Ephemeral Estuaries of the Deltaic Environment*, in ESTUARIES, p. 115 (G. H. Lauff ed. 1967).
- Exhibit 5** J. P. Morgan, "Deltas—A Résumé," *Journal of Geological Education*, Vol. XVIII, No. 3, pp. 107-117 (May, 1970).
- Exhibit 6** J. P. Morgan, J. M. Coleman and S. M. Gagliano, *Mudlumps at the Mouth of South Pass, Mississippi River; Sedimentology, Paleontology, Structure, Origin and Relation to Deltaic Processes*, LOUISIANA STATE UNIVERSITY STUDIES; COASTAL STUDIES SERIES, No. 10 (1963).
- Exhibit 7** J. P. Morgan, Transparencies, Vol. 1, GP-1 through GP-31, inclusive, as follows:

LIST OF OVERHEAD TRANSPARENCY ILLUSTRATIONS TO ACCOMPANY TESTIMONY OF

JAMES P. MORGAN CONCERNING GENERAL GEOLOGY, GEOLOGIC PROCESSES AND RESULTING MORPHOLOGY OF THE MISSISSIPPI RIVER DELTA.

(These transparencies were made by James P. Morgan for teaching purposes and for illustrating scientific publications. Where taken from other sources, references are given.)

<i>Chronologic Number of Illustration</i>	<i>Louisiana Preliminary Identifying Number or Citation</i>	<i>Description of Illustration</i>
GP-1	604	Drainage basin of the Mississippi River.
GP-2	596	Diagrammatic illustration of the longitudinal stream profile.
GP-3	1201	Geologic time scale of the Quaternary Period.
GP-4	1200	Longitudinal profile of the Mississippi River comparing present Gulf level with glacial stage Gulf level.
GP-5	591	Generalized geologic map of Louisiana in relation to glacial stage entrenched Mississippi River.
GP-6	601	Movement of stream load, suspended and bed load.
GP-7	1199	Conventional depositional sedimentary sequence in a water body.

GP-8	600	Diagrammatic illustration of a "Gilbert-type" delta. After G. K. Gilbert, "Lake Bonneville", 1890.
GP-9	598	Idealized concept of delta formation. Stages A-D.
GP-10	605	Hydrography at the mouth of an idealized distributary.
GP-11	594	Longitudinal profiles along an idealized distributary.
GP-12	595	Transverse profiles across an idealized distributary.
GP-13	599	Idealized concept of delta formation. Stages E-F.
GP-14	602	Idealized concept of delta formation. Stage G.
GP-15	597	Idealized representation of depositional environments and sediment types at a distributary mouth.
GP-16	590	Historical sequences of Mississippi Delta lobes from 4600 years (before present) to present time. Modified from Kolb and Van Lopik, 1958.
GP-17	592	Modern Mississippi River sub-deltas compared with maps of 1838 and 1960.
GP-18	603	Three-dimensional illustration of the Birdfoot Delta of the Mississippi River. Modified from H. N. Fisk, 1961.

- GP-19 593 Schematic diagram showing deltaic progradation in a subsiding delta.
- GP-20 589 Stages in the development of interdistributary bays in an abandoned distributary system. From J. P. Morgan, 1967.
- GP-21 Fig. 3 West Bay in 1816. From J. P. "Estuaries" Morgan, 1967.
- GP-22 Fig. 4 West Bay in 1922. From J. P. "Estuaries" Morgan, 1967.
- GP-23 Fig. 5 West Bay in 1958. From J. P. "Estuaries" Morgan, 1967.
- GP-24 Fig. 8 Cubit's Crevasse into Bay Rondo
"Deltas" in 1873. From J. P. Morgan, 1970.
- GP-25 Fig. 8 Cubit's Crevasse into Bay Rondo
"Deltas" in 1901. From J. P. Morgan, 1970.
- GP-26 Fig. 8 Cubit's Crevasse into Bay Rondo
"Deltas" in 1911. From J. P. Morgan, 1970.
- GP-27 Fig. 8 Cubit's Crevasse into Bay Rondo
"Deltas" in 1925. From J. P. Morgan, 1970.
- GP-28 Fig. 8 Cubit's Crevasse into Bay Rondo
"Deltas" in 1933. From J. P. Morgan, 1970.
- GP-29 Fig. 8 Cubit's Crevasse into Bay Rondo
"Deltas" in 1968. From J. P. Morgan, 1970.

- GP-30 Fig. 10 Isopach map showing sedimentary mass in Bay Rondo resulting from Cubit's Crevasse. From J. P. Morgan, 1970.
- GP-31 Fig. 7 Interdeltaic estuarine basin, Mississippi Delta. From J. P. Morgan, 1967.

REFERENCES TO SOURCES CITED

- Fish, H. N., *Bar-finger Sands of the Mississippi Delta*. in GEOMETRY OF SANDSTONE BODIES - A SYMPOSIUM. Tulsa: Am. Assoc. Petroleum Geologists (1961), pp. 29-52.
- Gilbert, G. K., Lake Bonneville: United States Geological Survey (1890), Monograph No. 1.
- Kolb, C. R., and Van Lopic, J. R., *Geology of the Mississippi River Deltaic Plain, Southeastern Louisiana*. U. S. ARMY CORPS OF ENGINEERS, WATERWAYS EXPT. STA. TECH. REPT. Vicksburg (1958), pp. 3-483 and 3-484.
- Morgan, J. P., *Ephemeral Estuaries of the Deltaic Environment*, in ESTUARIES, G. H. Lauff ed. : American Assoc. for Advancement of Science (1967), pp. 115-120.
- Morgan, J. P., "Deltas—a Résumé," *Journal of Geological Education*. Vol. XVIII, No. 3 (May, 1970), pp. 107-117.

- Exhibit 8** U.S.C. & G.S. Chart No. 1272 - 22nd edition, December 2, 1968.
- Exhibit 9** Photographs of Dr. J. P. Morgan - Volume 2, 1 through 41, inclusive, as follows:

LIST OF PHOTOGRAPHS TO ACCOMPANY TESTIMONY OF JAMES P. MORGAN CONCERNING GENERAL GEOLOGY AND MORPHOLOGY OF THE MISSISSIPPI RIVER DELTA

(All photographs taken by James P. Morgan)

<i>Chronologic Number of Illustration</i>	<i>Louisiana Preliminary Identifying Number</i>	<i>Date of Photograph</i>	<i>Description of Photograph</i>
1	100	6-26-69	Cubit's Crevasse opening from Mississippi River (background)
2	99	6-26-69	Cubit's Crevasse opening from Mississippi River (background) into Bay Rondo area to the east of the Mississippi Delta.
3	127	8-27-69	Cubit's Crevasse area. Mouth of Bienvenue Pass in right foreground, Mississippi Delta.
4	128	8-27-69	Mouth of Dead Woman's Pass (middle background), Cubit's Crevasse area, Mississippi Delta.
5	129	8-27-69	Mouth of Dead Woman's Pass (middle ground) Mississippi Delta.
6	102	8-27-69	Town of Venice, La. and the Jump (background) leading into West Bay. Inundation and property

damage resulting from Hurricane Camille.

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| 7 | 137 | 9-3-69 | View northeast of mouth of Pass Du Bois, Mississippi Delta. West Bay area in background. |
| 8 | 136 | 9-3-69 | View southeast of mouth of Pass Du Bois, Mississippi Delta. Aerial view of area shown on TL-185 through 189. |
| 9 | 135 | 9-3-69 | View north at mouth of Pass Du Bois, Mississippi Delta. Ground photograph showing exhumed marsh and shell piled up by wave action resulting from Hurricane Camille. |
| 10 | 131 | 9-3-69 | Ground photo. View north at mouth of Pass Du Bois, Mississippi Delta. |
| 11 | 134 | 9-3-69 | View northwest at mouth of Pass Du Bois, Mississippi Delta. Ground photo of exhumed marsh and scattered shell resulting from Hurricane Camille. |
| 12 | 132 | 9-3-69 | View north at mouth of Pass Du Bois, Mississippi Delta. Ground photograph. |
| 13 | 133 | 9-3-69 | View northeast at mouth |

- of Pass Du Bois, Mississippi Delta. Ground photograph of exhumed marsh.
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| 14 | 120 | 8-27-69 | View downstream along South Pass, Mississippi Delta. Note sedimentation in East Bay (right) through breaks in the West Bank of South Pass. |
| 15 | 167 | 9-3-69 | View of west bank, South Pass, Mississippi Delta. East Bay in foreground. |
| 16 | 119 | 8-27-69 | Sedimentation in East Bay, Mississippi Delta, through breaks in the West bank of South pass. |
| 17 | 118 | 8-27-69 | West bank of South Pass, Mississippi Delta (foreground). The Crevasse into Garden Island Bay in background. |
| 18 | 117 | 8-27-69 | West bank of South Pass, Mississippi Delta (foreground). Note lighthouse on the levee at right of photo. |
| 19 | 75 | 6-26-69 | Sediment-laden water flowing across Southwest Pass levees into West Bay, Mississippi Delta. |
| 20 | 160 | 9-3-69 | West bank of South Pass, Mississippi Delta. East Bay to right. |

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| 21 | 158 | 9-3-69 | Crevasse opening into East Bay from South Pass, Mississippi Delta. Midway between Upper Cave Light and Old Grand Bayou Light. |
| 22 | 163 | 9-3-69 | Mud flats and marsh extending into East Bay from west bank of South pass, Mississippi Delta. |
| 23 | 170 | 9-3-69 | View looking east-north-east across shoal in East Bay, Mississippi Delta. South Pass and fresh water reservoir in distance. |
| 24 | 105 | 8-27-69 | Mouth of Southwest Pass (right background) and sand spit extending into East Bay, Mississippi Delta. |
| 25 | 145 | 9-3-69 | East Bay sand spit. Southwest Pass and levees in background. |
| 26 | 144 | 9-3-69 | East Bay sand pit. Southwest Pass and levees in background. |
| 27 | 143 | 9-3-69 | East Bay sand spit. Southwest Pass and levees in background. |
| 28 | 104 | 8-27-69 | View south along sand spit in East Bay. South- |

- west Pass, Mississippi River in right of photo.
- | | | | |
|----|-----|---------|--|
| 29 | 76 | 6-26-69 | View West toward Mouth of Southwest Pass showing sand spit extending northward into East Bay, Mississippi Delta. |
| 30 | 140 | 9-3-69 | East bank of Southwest Pass, Mississippi Delta in foreground. Note sand spit extending into East Bay (middle ground). |
| 31 | 146 | 9-3-69 | North end of sand spit in East Bay. Southwest Pass in background. Double Bayou in distance. |
| 32 | 112 | 8-27-69 | View northwest across Joseph Bayou area. Southwest Pass in background, Mississippi Delta. |
| 33 | 150 | 9-3-69 | Joseph Bayou area. Upper end of East Bay, Mississippi Delta. Head of Passes in background, Joseph Bayou in foreground. |
| 34 | 152 | 9-3-69 | View south down Joseph Bayou into East Bay, Mississippi Delta. |
| 35 | 149 | 9-3-69 | View east across mouth of Joseph Bayou, Mississippi Delta. South Pass in background. |

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|----|-----|---------|--|
| 36 | 151 | 9-3-69 | Joseph Bayou area. Upper end of East Bay, Mississippi Delta. Head of Passes in background, Joseph Bayou in foreground. |
| 37 | 154 | 9-3-69 | Upper (northern) end of East Bay, Mississippi Delta. Head of Passes in background. |
| 38 | 116 | 8-27-69 | View northwest across Joseph Bayou area, Mississippi Delta. |
| 39 | 113 | 8-27-69 | View west across south end of Joseph Bayou area, Mississippi Delta. |
| 40 | 147 | 9-3-69 | View southeast across East Bay. Mouth of Joseph Bayou in center of photograph. South Pass in distance. |
| 41 | 148 | 9-3-69 | View southeast across East Bay. Mouth of Joseph Bayou in left middle ground. South Pass in distance. |

Exhibit 10 J. P. Morgan, *Genesis and Paleontology of the Mississippi River Mudlumps*, Louisiana Geological Survey, Bulletin No. 35 (1961).

Exhibit 10-A Exhibits to James P. Morgan, *Gene-*

sis and Paleontology of the Mississippi River Mudlumps, Louisiana Geological Survey, Bulletin No. 35 (1961).

- Exhibit 11** J. P. Morgan, J. R. Coleman and S. M. Gagliano, *Mudlumps: Diapiric Structures in Mississippi Delta Sediments*, in DIAPIRISM AND DIAPIRS, Am. Assoc. Petroleum Geologists, Memoir No. 8, pp. 145-161 (1968).
- Exhibit 12** Photographs by Dr. J. P. Morgan of Mudlumps, Vol. 3, 1 through 52, inclusive, as follows:

LIST OF PHOTOGRAPHS AND ILLUSTRATIONS
TO ACCOMPANY TESTIMONY OF JAMES P.
MORGAN CONCERNING MUDLUMPS AT
THE MOUTHS OF THE MISSISSIPPI RIVER

(all illustrations or photographs by James P.
Morgan unless otherwise annotated)

<i>Chronologic Number of Illustration</i>	<i>Louisiana Prelimi- nary Identifying Number or Citation</i>	<i>Date of Photo- graph or Publication</i>	<i>Description of Photograph or Illustration</i>
1	Fig. 1, Mem. 8	1968	Areas of mudlump development at major tributary mouths, Mississippi River Delta.
2	98	6-26-69	Mudlump islands seaward from Pass A Loutre-North Pass, Mississippi Delta (background).

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| 3 | 97 | 6-26-69 | Mudlump island seaward from mouth of Pass A Loutre, Mississippi Delta. |
| 4 | 95 | 6-26-69 | Mudlump islands seaward from mouth of Pass A Loutre, Mississippi Delta. |
| 5 | 96 | 6-26-69 | Detail of largest mudlump island off mouth of Pass A Loutre, Mississippi Delta. Island is also shown on photos TL-54 and TL-56. |
| 6 | Fig. 6, Sept. 61
Bull. 35 | | Schematic cross section of typical mudlump, indicating stratigraphic and structural characteristics. |
| 7 | Fig. 4, Sept. 61
Bull. 35 | | Furrowed surface appearance of mudlump island. Aerial photograph of NP-3 taken April 1948 (H. N. Fisk) ¹ . |
| 8 | 93 | 6-26-69 | Mudlump seaward from mouth of Northeast Pass, Mississippi Delta. See photo TL-51 for relationship to land. |
| 9 | 92 | 6-26-69 | Ground photograph showing details of mudlump island at mouth of Northeast Pass, Mississippi Delta. See photo TL-51 for relationship to land. |
| 10 | 125 | 8-27-69 | Southeast Pass mudlump |

¹ Photograph taken April 1948 by H. N. Fisk.

islands with the mouth of the pass in background. See TL-132.

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| 11 | 87 | 6-26-69 | Mouth of Southeast Pass, Mississippi Delta (background) and some of the mudlump islands. |
| 12 | 124 | 8-27-69 | Southeast Pass mudlump islands. View taken looking seaward. See TL-134. |
| 13 | 85 | 6-26-69 | Mudlump seaward from the mouth of Southeast Pass, Mississippi Delta. Old Balize Bayou in left background. |
| 14 | 89 | 6-26-69 | Detail of mudlump island nearest mouth of Southeast Pass, Mississippi Delta. (See photo TL-40, TL-45 and TL-46 also of same island.) |
| 15 | 91 | 6-26-69 | Same as TL-43. Detail of mudlump island nearest mouth of Southeast Pass, Mississippi Delta (See photo TL-40). |
| 16 | 90 | 6-26-69 | Same as TL-43. Detail of mudlump island nearest mouth of Southeast Pass, Mississippi Delta (See photo TL-40). |
| 17 | 88 | 6-26-69 | Group of three mudlump |

islands seaward from the mouth of Old Balize Bayou, Mississippi Delta.

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| 18 | 84 | 6-26-69 | South Pass jetties, sand spit and mudlumps. Fresh water-marine water boundary in left foreground. |
| 19 | 81 | 6-26-69 | Detail of central mudlump shown on photo TL-37. Mudlumps No. 89-90 and South Pass sand spit and jetties in distance. |
| 20 | 121 | 8-27-69 | East Jetty South Pass, Mississippi Delta (foreground). Coast Guard Station and Bar Pilot Station on west bank. Mudlump islands in background. |
| 21 | 122 | 8-27-69 | Shoal area waves over South Pass sand spit which was breached by Hurricane Camille. South Pass mudlump islands in left middle ground. |
| 22 | 123 | 8-27-69 | South Pass mudlump islands. Waves breaking (left middle ground) show position of sand spit which was breached by Hurricane Camille. |
| 23 | Fig. 44, Sept. 61
Bull. 35 | 61 | Aerial photograph of South Pass mudlumps. |

Left to right, Sp-4, Sp-1,
Sp-2 and Sp-3.

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| 24 | 82 | 6-26-69 | Spit composed of organic matter (coffee grounds) extending westward from mudlumps 89-90 at mouth of South Pass into East Bay, Mississippi Delta. |
| 25 | 77 | 6-26-69 | Ground photo showing spit comprised of organic material (coffee grounds) extending East Bay from Mudlump 89-90 at mouth of South Pass, Mississippi Delta. |
| 26 | 168 | 9-3-69 | Ground photograph looking south of South Pass mudlump 89-90. Note wave cut bench and "ramassis" (plant debris) from Hurricane Camille. |
| 27 | Fig. 16, Sept. 61
Bull. 35 | | Raised terrace, left foreground, has resulted from secondary uplift of island SP-1. Tilting has caused the cliff to increase from 2 feet (foreground to about 5 feet (background). Two earlier terraces are shown at left. |
| 28 | Fig. 7, 1968
Mem. 8 | | Coring operations on mudlump 89-90, South Pass. |
| 29 | 977 | 8-63 | View looking south of |

- borehole casing in mudlump SP 89-90. Small mudlump island in background is mudlump 92, "the castle."
- | | | | |
|----|------|---------|--|
| 30 | 989 | 6-63 | View looking south at mudlump 92, "the castle." |
| 31 | 1006 | 1-69 | View looking northeast of South Pass sand spit with mudlump No. 92 in foreground. |
| 32 | 79 | 6-26-69 | Detail of central mudlump shown on photo TL-27, mouth of South Pass, Mississippi Delta. |
| 33 | 78 | 6-26-69 | Three mudlumps breaking the water surface at mouth of South Pass, Mississippi Delta. Note: Mudlumps are shown on the seaward (right margin) side of photo TL-37. |
| 34 | 80 | 6-26-69 | Detail of rear (easternmost) mudlump shown on photo TL-27, South Pass, Mississippi Delta. |
| 35 | 979 | 11-64 | Ground view on south side of mudlump 94, South Pass. |
| 36 | 981 | 11-64 | Ground view of mudlump 94 with geologists collecting fossils. |

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|----|-------------------------------|-------|--|
| 37 | 967 | 11-64 | Ground photograph looking toward the northwest of the west side of mudlump 93 at South Pass. Photograph taken at low tide. |
| 38 | Fig. 4, 1968
Mem. 8 | | South Pass mudlump islands mapped during period from 1876 to 1961. |
| 39 | Fig. 5, 1968
Mem. 8 | | Island and submarine mudlump distribution at South Pass. Data from 123 maps dated between 1876 and 1961. |
| 40 | Fig. 42, Sept. 61
Bull. 35 | | Advance of the bar at South Pass, 1920 to 1950. |
| 41 | Fig. 43, Sept. 61
Bull. 35 | | Map of the bar at South Pass. Submarine mudlumps indicated. |
| 42 | Fig. 10, 1968
Mem. 8 | | Sites of appearance of initial mudlumps and their progression, determined from maps dated between 1867 and 1961. |
| 43 | Fig. 40, Sept. 61
Bull. 35 | | Advance of the bar at Southwest Pass, 1920 to 1950. |
| 44 | Fig. 41, Sept. 61
Bull. 35 | | Map of the bar at Southwest Pass. Submarine mudlumps indicated. |
| 45 | Fig. 36, Sept. 61
Bull. 35 | | Schematic diagram showing relationship between |

- bar growth and mudlump development.
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| 46 | Fig. 6, 1968
Mem. 8 | Bore-hole locations and profile line along South Pass sand spit. |
| 47A | Fig. 22, 1968
Mem. 8 | Diagrammatic representation of South Pass mudlump origin and development, Stage A. |
| 47B | Fig. 22, 1968
Mem. 8 | Diagrammatic representation of South Pass mudlump origin and development, Stage B. |
| 47C | Fig. 22, 1968
Mem. 8 | Diagrammatic representation of South Pass mudlump origin and development, Stage C. |
| 47D | Fig. 22, 1968
Mem. 8 | Diagrammatic representation of South Pass mudlump origin and development, Stage D. |
| 47E | Fig. 23, 1968
Mem. 8 | Diagrammatic representation of South Pass mudlump origin and development, Stage E. |
| 47F | Fig. 23, 1968
Mem. 8 | Diagrammatic representation of South Pass mudlump origin and development, Stage F. |
| 47G | Fig. 23, 1968
Mem. 8 | Diagrammatic representation of South Pass mudlump origin and development, Stage G. |

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| 47H | Fig. 23, 1968
Mem. 8 | Diagrammatic representation of South Pass mudlump origin and development, Stage H. |
| 48 | Fig. 9, 1968
Mem. 8 | Shallow subsurface stratigraphy and structure of South Pass. Line of section is shown in Fig. 6. |
| 49 | Fig. 18, 1968
Mem. 8 | Multiple reverse faulting found on wave-planed surface of South Pass mudlump 94. |
| 50 | Fig. 5, 1963
C.S.I
No. 10 | Comparison maps showing South Pass sand spit development and its relationship to mudlump islands. |
| 51 | LPI Dec.
No. 968 1969 | View looking southwest of steamship aground in East Bay. Mudlump 89-90 in foreground and mudlump 93 in left rear of photograph. |
| 52 | LPI Dec.
No. 965 1969 | Steamship aground in East Bay to the west of mudlump 93. |

* * * *

PUBLICATIONS CITED

- Morgan, James P., "Mudlumps at the Mouths of the Mississippi River," in *Genesis and Paleontology of the Mississippi River Mudlumps*. Louisiana Geological Survey, Bulletin No. 35 (1961), pp. 1-116.
- Morgan, James P., Coleman, James M., and Gagliano, Sherwood M., *Mudlumps: Diapiric Structures in Mississippi Delta Sediments*, in DIAPIRISM AND DIAPIRS. American Association of Petroleum Geologists, Memoir No. 8 (1968), pp. 145-161.
- Morgan, James P., Coleman, James M., and Gagliano, Sherwood M., *Mudlumps at the Mouth of South Pass, Mississippi River; Sedimentology, Paleontology, Structure, Origin, and Relation to Deltaic Processes*. LOUISIANA STATE UNIVERSITY STUDIES; COASTAL STUDIES SERIES, No. 10 (1963).
- Exhibit 13** LPI 1224)
- Exhibit 14** LPI 1228)
- Exhibit 15** LPI 1227) Photos of birds and peli-
- Exhibit 16** LPI 1226) cans by Dr. Morgan
- Exhibit 17** LPI 1225)
- Exhibit 18** LPI 1060, "Areas in Dispute in Louisiana Closing Line Contentions."
- Exhibit 19** LPI 618, Mudlumps photo, M-101-6 dated June 26, 1969, Mouth of Southeast Pass, Mississippi Delta, with mudlump islands in foreground, view toward the northwest.
- Exhibit 20** LPI 617, Photograph by Dr. James

P. Morgan concerning distribution of mudlumps at South Pass, M-101-5 dated June 26, 1969, South Pass mudlumps and sand spit, Mississippi Delta. Mudlump 93 on left of photo. Mudlump 89-90 in the central part of photo and new mudlumps offshore in right central part of photo.

- Exhibit 21** LPI 362 through 430—Louisiana Original Brief Exhibit No. 21, 1 through 69 (includes Talcott's 1839 map).
- Exhibit 22** LPI 1202—copy of notes by Dr. James P. Morgan and Mr. David Morgan which reflect the published nautical charts of the period of 1873 through 1969 for the Mississippi Delta Region and East Bay changes reflected thereby.
- Exhibit 23** LPI 1054. Set of display materials pertaining to historic changes and semicircle data in East Bay. (1839-1956)
- Exhibit 23-A** LPI 1054 (same as above with the overlays)
- Exhibit 24** A list of scientific publications by Dr. James P. Morgan.
- Exhibit 25** Case of *The Anna*, 5 C. Rob. 373.
- Exhibit 26** LPI 647—Bucket Bend Bay Exhibit.
- Exhibit 26-A** Corrected sheet to Ex. 26.
- Exhibit 27** LPI 1053—Opinion of the Solicitor

Cox, dated December 20, 1963, approved by the then Attorney General, Robert Kennedy, addressed to the General, the Honorable Archibald Secretary of the Interior, at the request of the President concerning lands originally formed as islands in the marginal seas. Attached to the opinion is a letter dated December 20, 1963, by the Attorney General to the Secretary of the Interior expressing his accord.

Exhibit 28 Matters relating to Tern Islands and other Bird Reservations as follows:

<i>Description</i>	<i>Louisiana Preliminary Identifying Number</i>
1. Executive Order of August 8, 1907	199 & 217
2. "Bird Lore for 1907," pp. 229 <i>et seq.</i>	203
3. Map of the State of Louisiana compiled from the official records of the General Land Office dated 1916 (See Exh. 258)	66
4. Map of the State of Louisiana compiled from the official records of the General Land Office dated 1930	215
5. Map of Plaquemines Parish (South Section), Louisiana, dated 1958	216
6. Quadrangle Map of East Delta, Louisiana, 1959 edition	204
7. 31 F.R. 16024 dated December 15, 1966	

31 F.R. 7686 dated May 24, 1968	205
8. 31 F.R. 16027 dated December 15, 1966	206
9. 31 F.R. 16027 dated December 15, 1966	207
10. <i>Alaska Pacific Fisheries v. United States</i> , 39 S.C. 40, 248 U.S. 78 (1918)	
11. <i>United States of America v. State of Alaska, et al.</i> 423 F. 2d 764 (1970)	
12. General correspondence regarding Tern Islands Reservation	211 & 218
13. Bureau of Land Management Miscellaneous File No. 1883786	220
14. Fish and Wildlife Service Files LAEO—Louisiana, Tern Islands and Gas and Oil LA—Louisiana, Tern Islands	219
15. First Formal Request for Admissions by State of Louisiana dated April 29, 1970, and Response to Louisiana's First Formal Request for Admissions by United States	
16. State of Louisiana's Interrogatories dated February 3, 1970, and Response of United States thereto dated March 4, 1970	
17. State of Louisiana's Interrogatories dated October 23, 1969, and Answers of United States with attach-	

- ments thereto dated December 23, 1969
18. State of Louisiana's Request to the Bureau of Sports Fishery dated December 8, 1969, and Response of United States thereto dated January 20, 1970
 19. Directory of National Wildlife Refuges 209
 20. Wildlife Sanctuaries in Louisiana from First Biennial Report of the Department of Wild Life and Fisheries Commission, 1944 and 1945 210
 21. Memorandum dated September 25, 1952, addressed to the Bureau of Land Management suggesting revocation of Tern Islands Reservation 201
 22. Public Land Order No. 892 of April 15, 1953, 18 Federal Register 2342, dated April 22, 1953, which revoked Tern Islands Reservation 202
 23. Birds of Sabine National Wildlife Refuge 819
 24. Birds of Lacassine National Wildlife Refuge 820
 25. Lacassine National Wildlife Refuge 821
 26. Executive Order of August 17, 1907, creating Shell Keys Reservation 822

27. General correspondence regarding Shell Keys Reservation	824
28. Birds of the Delta National Wildlife Refuge	212
29. National Wildlife Refuges in South- east Region 4	213
30. General correspondence regarding East Timbalier Island	823
31. Gulf Island National Wildlife Re- fuges (Breton)	825
32. General correspondence regarding Breton National Wildlife Refuge	826
33. Inspection Report of East Tim- balier Bird Reservation dated April 7, 1947, by John Lynch, Biologist	1162
34. Refer the Court to 18 U.S.C. 41	

Exhibit 29	LPI 215 - Map of the State of Louisiana compiled from the Official Records of General Land Office - 1930
Exhibit 30	LPI 1007 - Picture of bird display at Louisiana State University Museum
Exhibit 31	LPI 775)
Exhibit 32	LPI 776)
Exhibit 33	LPI 807)
Exhibit 34	LPI 812)
Exhibit 35	LPI 814) Photographs taken by Allan
Exhibit 36	LPI 816) Ensminger on flight over

- Exhibit 37** LPI 800) Mississippi Delta area in January, 1970
- Exhibit 38** LPI 805)
- Exhibit 39** LPI 815)
- Exhibit 40** LPI 798)
- Exhibit 41** LPI 1192 - View of fresh dredge spoil jetties (Photograph by Mr. Allan Ensminger)
- Exhibit 42** LPI 787 - Photograph taken by Mr. Allan Ensminger on flight over Mississippi Delta area January, 1970
- Exhibit 43** LPI 783 - Photograph taken by Mr. Allan Ensminger on flight over Mississippi Delta area, January, 1970
- Exhibit 44** LPI 1191 - View of portion of spit above water at mouth of Pass Tante Phine (Photograph by Mr. Allan Ensminger)
- Exhibit 45** LPI 1187 - View of portion of spit at Pass Tante Phine above water (Photograph by Mr. Allan Ensminger)
- Exhibit 46** LPI 1188 - View of islands breaking up north of West Bay (Photograph by Mr. Allan Ensminger)
- Exhibit 47** LPI 1189 - View of island headland at north side of West Bay (Photograph by Mr. Allan Ensminger)
- Exhibit 48** LPI 780 - Photograph taken by Mr. Allan Ensminger on flight over Mississippi Delta area in January, 1970

- Exhibit 49** Index to Mr. Allan Ensminger's photographs
- Exhibit 50** U. S. C. & G. S. Chart No. 1275, Edition 10, June 27, 1970
- Exhibit 51** A History of the Inland Water Line, as follows:

A HISTORY OF THE INLAND WATER LINE

CONTENTS

<i>Description</i>	<i>Louisiana Preliminary Identifying Number</i>
1. Refer the Court to the Act of August 19, 1890 (Rules for the prevention of collisions on the high seas)	
2. Refer the Court to United States Revised Statute 4233, Act of April 29, 1864, c. 69, 13 Stat. 58	
3. Refer the Court to Act of February 19, 1895, and amendments (28 Stat 672 32 Stat 829 37 Stat 736 60 Stat 1097 33 USC 151)	
4. Refer the Court to Act of June 7, 1897 (30 Stat 96)	
5. Department of Treasury Circular No. 127 issued June 13, 1895	188
6. Treasury Department Circular No. 88 of 1897	1161

7. Refer the Court to 1895 Edition of United States Coast & Geodetic Survey Coast Chart No. 194 (Exhibit 6 to Louisiana Brief of October, 1968) 367
8. Treasury Department Circular No. 107 of 1900 189
9. Department of Commerce and Labor Circular No. 61 of March 9, 1905 190
10. Department of Commerce and Labor Circular No. 88 of 1905 191
11. Department of Commerce and Labor Circular No. 158 of November 21, 1907 192
12. Refer the Court to 1907 Edition of United States Coast & Geodetic Survey Coast Chart No. 194 (Exhibit 8 to Louisiana Brief of October, 1968) 369
13. Department of Commerce Circular No. 230 of 1911 193
14. Refer the Court to Exhibit 10 to Louisiana Brief
15. Department of Commerce Circular No. 230 of June 8, 1917 194
16. Department of Commerce Circular No. 230 of October 10, 1927 195
17. Department of Commerce Circular No. 230 of December 26, 1928 196

18. Department of Commerce Circular No. 230 of December 8, 1932	197
19. Refer the Court to Federal regulation of December, 1953	
20. Refer the Court to Exhibits 12, 14, 16 and 18 of Louisiana Brief of October, 1968 (prior editions of United States Coast & Geodetic Survey Charts No. 194 and super- ceding Chart No. 1272)	373 375 377 379
21. Refer the Court to Exhibit 20 of Louisiana Brief	381
22. Refer the Court to Maps and other materials showing location of In- land Water Lines designated and defined under the Act of February 19, 1895	1027
23. Copy of transcript of hearing on the proposed change of the line of Demarcation held at New Orleans, Louisiana, August 7, 1967	49
24. Copy of transcript of public hearing concerning the lines of demarca- tion between Inland and Interna- tional Rules of the Road, conducted at Morgan City, Louisiana, on Au- gust 3, 1967	50

Exhibit 52 Census of the United States, as follows:

LOUISIANA EXHIBIT No. 52

CENSUS OF THE U.S.

CONTENTS

<i>Description</i>	<i>Louisiana Preliminary Identifying Number</i>
1. A published book entitled, <i>Measurement of Geographic Area by Malcolm J. Proudfoot</i> , published by the Bureau of the Census of the United States Department of Commerce in connection with the 1940 16th census of the United States	72
2. Area Measurement reports published by the Bureau of the Census of the United States Department of Commerce showing areas of Louisiana: 1960, July, 1967, G. E. - 20, No. 20	1129
Exhibit 53	The Captain of the Port of New Orleans, as follows:

THE CAPTAIN OF THE PORT OF NEW ORLEANS

CONTENTS

<i>Description</i>	<i>Louisiana Preliminary Identifying Number</i>
1. Refer the Court of CFR Subpart 67.50	
2. Refer the Court to 33 CFR Part 6, Parts 121, 122 and 124, 125, 126	

3. Refer the Court to 46 CFR Parts 146, 147
4. Refer the Court to 33 CFR subpart 3.40-75
5. Coast Guard seizure of *Przemyl* dated October 29, 1927 221
6. Coast Guard seizure of "Emilia G" dated September 24, 1925 222
7. Coast Guard seizure No. 874 of *Fleur de Lis* 223
8. Coast Guard seizure of *Memthis* dated April 22, 1930 224
9. Coast Guard seizure of *St. Francisco* 225
10. United States Coast Guard Law Enforcement at Sea Relative to Smuggling 226
11. Refer the Court to the prohibition case of *Ford, et al. v. United States*, 47 S.Ct. 531
12. Refer the Court to the prohibition case of *Cunard S. S. Co. v. Mellon*, 43 S. Ct. 504
13. Refer the Court to the prohibition case of *Cook v. United States*, 53 S.Ct. 305
14. State of Louisiana's Second Formal Requests for Admissions (with attachments) and Response of United States
15. State of Louisiana's Interrogatories

of October 23, 1969, and Response of United States

16. United States' Interrogatories of January 20, 1970, and Response of State of Louisiana
17. Refer the Court to 33 CFR Subpart 37.50 and 33 CFR subpart 3.40 - 10 regarding New Orleans Marine Inspection Zone

Exhibit 54 Permits Issued by United States Army Corps of Engineers for Dredging Canals and Other Operations in East Bay, as follows:

**PERMITS ISSUED BY UNITED STATES ARMY
CORPS OF ENGINEERS FOR DREDGING
CANALS AND OTHER OPERATIONS IN
EAST BAY**

CONTENTS

<i>Description</i>	<i>Louisiana Preliminary Identifying Number</i>
1. Permit file from records of New Orleans District Corps of Engineers, granting permit to Shell Oil Company to dredge in East Bay area with identifying cover sheet marked GM 276	1152
2. A Department of the Army permit from New Orleans District Office of the Corps of Engineers to the California Company, dated September 28, 1953, to dredge in tribu-	

- taries of East Bay area with related files from New Orleans District Corps of Engineers 1153
3. Permit from New Orleans District of the Corps of Engineers, dated 11 December 1950, with related correspondence including request, dated 22 September 1950, from Shell Oil Company the permittee, with cover title sheet marked GM 192 from records of New Orleans District, U. S. Corps of Engineers 1154
4. Request from Shell Oil Company to Corps of Engineers, New Orleans District, dated April 21, 1949, and permit dated May 12, 1949, to Shell Oil Company for dredging from records of New Orleans District Corps of Engineers 1155

Exhibit 55 Fishing Regulations in Five Volumes
as follows:

VOLUME I

FISHING REGULATIONS

CONTENTS

<i>Description</i>	<i>Louisiana Preliminary Identifying Number</i>
1. Act 18 of 1870	29
2. Act 106 of 1886	28
3. Act 110 of 1892	27

4. Act 121 of 1896	26
5. Act 153 of 1902	25
6. Act 52 of 1904	24
7. Act 144 of 1908	23
8. Act 189 of 1910	22
9. Act 127 of 1912	21
10. Act 6 of 1917	20
11. Act 139 of 1924	19
12. Act 258 of 1926	18
13. Act 67 of 1932	17
14. Act 227 of 1944	263 & 16
15. R.S. 56:421 through 460	
16. <i>Louisiana Land & Fish Co. v. Gasquet</i> , 45 La. Ann. 759	
17. <i>Doucet v. Texas Co.</i> , 17 So. 2d 340, 205 La. 312	
18. Opinion of Attorney General's Office dated December 8, 1937	228

VOLUME 2

19. Oyster Lease No. 3405 dated November 17, 1914, to United Fish & Oyster Co.	722
20. Oyster Lease No. 356 dated July 20, 1904, to Miss Henrietta McLaughlin	747
21. Oyster Lease No. 355 dated July 20, 1904, to Mrs. F. McLaughlin	732

22. Oyster Lease No. 357 dated July 20, 1904, to Miss M. McLaughlin	727
23. Oyster Lease No. 299 dated May 18, 1904, to Mrs. F. J. Lobrano	740
24. Oyster Lease No. 642 dated December 21, 1904, to Julien Cadro	749
25. Oyster Lease No. 3402 dated November 17, 1914, to United Fish & Oyster Co.	754
26. Oyster Lease No. 57 dated June 17, 1903, to Louis Diemell	717
27. Oyster Lease No. 300 dated May 18, 1904, to Miss Bertha Diemel	693
28. Oyster Lease No. 47 dated May 20, 1903, to Peter Spongia	738
29. Oyster Lease No. 46 dated May 20, 1903, to Louis Spongia	723
30. Oyster Lease No. 45 dated May 20, 1903, to Peter Spongia	716
31. Oyster Lease No. 59 dated June 17, 1903, to John McLaughlin	715
32. Oyster Lease No. 40 dated May 20, 1903, to John Conaway	720
33. Oyster Lease No. 643 dated December 21, 1904, to Frank Morgan	750
34. Oyster Lease No. 644 dated December 21, 1904, to Capt. Erick Anderson	733
35. Oyster Lease No. 636 dated De-	

cember 21, 1904, to Thomas Jackson	748
36. Oyster Lease No. 308 dated July 20, 1904, to Edward W. Fitzgerald	651
37. Oyster Lease No. 307 dated July 20, 1904, to John W. Jackson	648
38. Oyster Lease No. 319 dated July 20, 1904, to Thomas Jackson	655
39. Oyster Lease No. 44 dated May 20, 1903, to Frank Miller	718
40. Oyster Lease No. 294 dated May 18, 1904, to Frank Richmond	694
41. Oyster Lease No. 297 dated May 18, 1904, to Hope Lamb & John Thomas Burns	674
42. Oyster Lease No. 295 dated May 18, 1904, to Warrick Brown	675
43. Oyster Lease No. 292 dated May 18, 1904, to Steven F. Purgley	673
44. Oyster Lease No. 291 dated May 18, 1904, to Gilmore & Jackson	714
45. Oyster Lease No. 774 dated February 15, 1905, to Joseph Cadro	731
46. Oyster Lease No. 775 dated February 15, 1905, to Messrs. O'Brien & Connaway	730
47. Oyster Lease No. 48 dated May 20, 1903, to Walter Miller	695
48. Oyster Lease No. 4168 dated November 22, 1918, to Erick Anderson	662

49. Oyster Lease No. 3400 dated November 17, 1914, to United Fish & Oyster Co.	653
50. Oyster Lease No. 3401 dated November 17, 1914, to United Fish & Oyster Co.	686
51. Oyster Lease No. 315 dated July 20, 1904, to A. E. Washburn	689
52. Oyster Lease No. 313 dated July 20, 1904, to Morgan Loar & Co.	652
53. Oyster Lease No. 317 dated July 20, 1904, to John Conaway	741
54. Oyster Lease No. 3420 dated December 5, 1914, to Mrs. Frank McLaughlin	682
55. Oyster Lease No. 303 dated May 18, 1904, to William A. Loar	692
56. Oyster Lease No. 335 dated July 20, 1904, to Andrew Spongin	688
57. Oyster Lease No. 640 dated December 21, 1904, to John Repath & Co.	687
58. Oyster Lease No. 3403 dated November 17, 1914, to United Fish & Oyster Co.	685
59. Oyster Lease No. 3408 dated November 17, 1914, to United Fish & Oyster Co.	683
60. Oyster Lease No. 3406 dated November 17, 1914, to United Fish & Oyster Co.	684

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|--|-----|
| 61. Oyster Lease No. 3422 dated December 5, 1914, to Mrs. Frank McLaughlin | 680 |
| 62. Oyster Lease No. 3398 dated November 17, 1914, to United Fish & Oyster Co. | 681 |
| 63. Oyster Lease No. 3416 dated December 5, 1914, to Mrs. Frank McLaughlin | 725 |
| 64. Oyster Lease No. 3404 dated November 17, 1914, to United Fish & Oyster Co. | 734 |
| 65. Oyster Lease No. 3275 dated September 11, 1914, to Zanenovich & Spongia | 753 |
| 66. Oyster Lease No. 4165 dated November 22, 1918, to Brick Anderson | 755 |
| 67. Oyster Lease No. 4176 dated November 27, 1918, to Leonard F. Edgecombe | 756 |
| 68. Oyster Lease No. 3770 dated September 10, 1910, to Frank J. Lobrano | 757 |
| 69. Oyster Lease No. 3407 dated November 17, 1914, to United Fish & Oyster Co. | 758 |
| 70. Oyster Lease No. 337 dated July 20, 1904, to John Spongia | 760 |
| 71. Oyster Lease No. 293 dated May 18, 1904, to E. D. Jones | 765 |

72. Oyster Lease dated March 25, 1903, to Whale Bay Oyster Co.	774
73. Oyster Lease No. 3399 dated November 17, 1914, to United Fish & Oyster Co.	742
74. Oyster Lease No. 1005 dated August 16, 1905, to Lobrano & McLaughlin	751
75. Oyster Lease No. 2842 dated July 15, 1912, to United Fish & Oyster Co.	752
76. Oyster Lease No. 298 dated May 18, 1904, to S. B. George & T. Kelly	772
77. Oyster Lease No. 349 dated November 18, 1908, to Nebert Burns	712
78. Oyster Lease No. 353 dated November 18, 1908, to Octave Barrios	708
79. Oyster Lease No. 386 dated July 20, 1904, to Red Fish Bay Oyster Co.	700
80. Oyster Lease No. 342 dated November 18, 1908, to Thomasin Burrois	690
81. Oyster Lease No. 351 dated June 15, 1905, to Ambroise Ansardi	710
82. Oyster Lease No. 348 dated November 18, 1908, to Augustin Burrois	713
83. Oyster Lease No. 350 dated November 18, 1908, to Lucies Buras	711

84. Oyster Lease No. 346 dated June 15, 1905, to P. V. Lacoste	696
85. Oyster Lease No. 383 dated July 20, 1904, to James Kiger	706
86. Oyster Lease No. 384 dated July 20, 1904, to Luke Johnson	701
87. Oyster Lease No. 387 dated July 20, 1904, to Delesdernier & Kiger	699
88. Oyster Lease No. 382 dated July 20, 1904, to Joseph P. Logn	707
89. Oyster Lease No. 385 dated July 20, 1904, to George W. Delesdernier	697
90. Oyster Lease No. 388 dated July 20, 1904, to J. T. Delesdernier	698
91. Oyster Lease No. 352 dated July 20, 1904, to John Ansel, Jr.	709
92. Oyster Lease No. 341 dated June 15, 1905, to E. J. Rodricquez	702
93. Oyster Lease No. 343 dated June 1, 1931, to Frank Musemeche	704
94. Oyster Lease No. 347 dated November 18, 1908, to Jeff C. Wenck	691
95. Oyster Lease No. 311 dated July 20, 1904, to Thomas Bulot & Louis Baril	668
96. Oyster Lease No. 314 dated July 20, 1904, to M. Baril	661
97. Oyster Lease No. 320 dated July 20, 1904, to John Ricovard	664

98. Oyster Lease No. 321 dated July 20, 1904, to J. G. Davis	656
99. Oyster Lease No. 56 dated May 20, 1903, to W. P. Hingle	663
100. Oyster Lease No. 302 dated May 18, 1904, to Mrs. Alexander Conway	658
101. Oyster Lease No. 296 dated May 18, 1904, to Mrs. Charles Post	659
102. Oyster Lease No. 310 dated July 20, 1904, to Alexander Conway	660
103. Oyster Lease No. 42 dated May 20, 1903, to Gustave Gusdrof	650
104. Oyster Lease No. 49 dated May 20, 1903, to August Johnson	649
105. Oyster Lease No. 43 dated May 20, 1903, to J. J. Williams	657
106. Oyster Lease No. 50 dated May 20, 1903, to Erick Anderson	676

VOLUME 3

107. Oyster Lease No. 2737 dated December 1, 1911, to W. J. Armstrong	677
108. Oyster Lease No. 318 dated July 20, 1904, to Charles Post	654
109. Oyster Lease No. 344 dated November 18, 1908, to George Burrois	705

110. Oyster Lease No. 309 dated July 20, 1904, to John Dugas	721
111. Oyster Lease No. 4194 dated December 12, 1918, to W. J. Armstrong	724
112. Oyster Lease No. 3636 dated October 18, 1915, to Nick Popich	726
113. Oyster Lease No. 1503 dated June 19, 1907, to W. J. Armstrong	729
114. Oyster Lease No. 340 dated July 20, 1904, to Chris Ansel	746
115. Oyster Lease No. 345 dated June 15, 1905, to Erick Anderson	759
116. Oyster Lease No. 336 dated July 20, 1904, to S. B. George & T. Kelly	768
117. Oyster Lease No. 3788 dated September 19, 1917, to Gulf Packing Co.	771
118. Oyster Lease No. 41 dated May 20, 1900, to Anton Duhon	773
119. Oyster Lease No. 11639 dated July 20, 1948, to Golden Meadows Fisheries Co.	764
120. Oyster Lease No. 11638 dated July 20, 1948, to Golden Meadows Fisheries Co.	767
121. Oyster Lease No. 11640 dated July 20, 1949, to Golden Meadows Fisheries	728

122. Oyster Lease No. 11641 dated July 20, 1948, to Golden Meadows Fisheries Co.	761
123. Oyster Lease No. 11637 dated July 20, 1948, to Golden Meadows Fisheries Co.	766
124. Oyster Lease No. 11642 dated July 20, 1948, to Golden Meadows Fisheries Co.	762
125. Oyster Lease No. 7061 dated July 15, 1929, to Constant Callahan	719
126. Oyster Lease No. 3855 dated November 8, 1917, to Foret, Pelegrin & Bro.	735
127. Oyster Lease No. 9905 dated September 25, 1942, to A. St. Martin & Co.	736
128. Oyster Lease No. 2506 dated May 23, 1918, to Thompson & Nini	737
129. Oyster Lease No. 5757 dated February 17, 1925, to Alonzo Lee	739
130. Oyster Lease No. 7241 dated January 15, 1930, to Aelane Pitre	744
131. Oyster Lease No. 7053 dated July 13, 1929, to Matis Vidos	665
132. Oyster Lease No. 7039 dated July 5, 1929, to Louisiana Oyster & Fish Co.	666
133. Oyster Lease No. 6032 dated February 6, 1936, to Colsom & Rebel	671

- | | |
|---|-----|
| 134. Oyster Lease No. 9337 dated September 29, 1939, to P. R. Norman & N. H. Breaux | 667 |
| 135. Oyster Lease No. 8252 dated October 10, 1934, to P. R. Norman & N. H. Breaux | 743 |
| 136. Oyster Lease No. 4061 dated August 14, 1918, to Louis Robardi | 679 |
| 137. Oyster Lease No. 8251 dated October 16, 1934, to P. R. Norman & N. H. Breaux | 763 |
| 138. Oyster Lease No. 8690 dated November 9, 1936, to P. R. Norman & N. H. Breaux | 669 |
| 139. Oyster Lease No. 9338 dated September 29, 1939, to P. R. Norman & N. H. Breaux | 670 |
| 140. Oyster Lease No. 7164 dated October 14, 1929, to Lester J. Boudreaux | 678 |
| 141. Oyster Lease No. 4042 dated July, 1918, to Alvin Chauvin | 672 |
| 142. Oyster Lease No. 7641 dated January 25, 1905, to Emelien Buras | 703 |
| 143. Oyster Lease No. 7175 dated November 2, 1929, to Oliver Terrebonne | 770 |
| 144. Oyster Lease No. 11869 dated April 20, 1949, to Frank & Vincent Bacala | 745 |

- | | | |
|------|--|-----|
| 145. | Oyster Lease No. 7095 dated October 4, 1929, to Leo Pitre | 769 |
| 146. | Copy of certified copy of application for survey for oyster purposes and list dated October 9, 1914, by United Fish and Oyster Company affecting part of East Bay | 12 |
| 147. | Copy of certified copy of lease of water bottoms for oyster purposes from Louisiana Conservation Commission to United Fish and Oyster Company dated October 14, 1914, affecting acreage in East Bay | 13 |
| 148. | Copy of certified copy of application for survey and lease for oyster purposes dated October 9, 1914, by United Fish and Oyster Company to Louisiana Conservation Commission affecting acreage in East Bay | 14 |
| 149. | Copy of certified copy of lease of water bottoms for oyster purposes from Conservation Commissioner of Louisiana to United Fish and Oyster Company dated October 14, 1914, affecting coverage in East Bay | 15 |
| 150. | Copy of Survey Map for portions of East Bay for oyster bedding purposes for United Fish and Oyster Company | 47 |
| 151. | Copy of Survey Map for portions | |

- | | |
|---|------|
| of East Bay for oyster bedding purposes for United Fish and Oyster Company | 51 |
| 152. Copy of certified copy of oyster lease map of South Pass and East Bay | 46 |
| 153. Department of Conservation, State of Louisiana Survey showing location and area of Oyster Leases between South Pass and Southwest Pass, Plaquemines Parish, compiled under the direction of Frank T. Payne, Engr. 1921 | 1164 |
| 154. Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of Leases 48; 4,168; 249; 3400; 3257; 3401; 301; 315; 313; 317; 3420; 303; 335; 640; 3403; 3408; 3406; 3422; 3398 | 841 |
| 155. Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of Leases 349; 353; 386; 342; 334; 351; 348; 350; 346; 383; 384; 387; 382; 385; 388; 352; 341; 343; 347 | 842 |
| 156. Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of Leases 311; 314; 320 | 843 |
| 157. Part of map from records of Louisiana Wild Life and Fisheries | |

- | | | |
|------|---|-----|
| | Commission showing location of
Leases 321; 56; 321; 302; 296; 310 | 845 |
| 158. | Part of map from records of Lou-
isiana Wild Life and Fisheries
Commission showing location of
Leases 42; 49; 43; 50; 2737 | 846 |
| 159. | Part of map from records of Lou-
isiana Wild Life and Fisheries
Commission showing location of
Leases 11,639; 11,638; 11,640;
11,641; 11,637; 11,642; 14,461;
14,240 | 840 |
| 160. | Part of map from records of Lou-
isiana Wild Life and Fisheries
Commission showing location of
Leases 7053; 7039; 6032; 9337;
8252; 4061; 8251; 8690; 9338A | 844 |
| 161. | Part of map from records of Lou-
isiana Wild Life and Fisheries
Commission showing location of
Leases 7164; 4042 | 847 |
| 162. | Part of map from records of Lou-
isiana Wild Life and Fisheries
Commission showing location of
Leases 7641; 7175; 11,896; 7095;
7039; 7053 | 848 |
| 163. | Part of map from records of Lou-
isiana Wild Life and Fisheries
Commission showing location of
Lease 18,330 | 838 |
| 164. | Part of map from records of Lou-
isiana Wild Life and Fisheries | |

Commission showing location of Leases 5,013 and 4,482	839
165. Report on Division of Oysters & Water Bottoms by James N. Mc- Connell, Director from Second Biennial Report 1946 - 1947	229
166. Report of Division of Oysters & Water Bottoms by James N. Mc- Connell, Director from Fourth Biennial Report 1950 - 1951	230
167. Report on Division of Oysters & Water Bottoms by James N. Mc- Connell, Chief, from Sixth Bienni- al Report 1954-1955	231

VOLUME 4

168. Act 245 of 1910	45
169. Act 168 of 1912	44
170. Act 193 of 1916	43
171. Act 86 of 1918	42
172. Act 68 of 1920	41
173. Act 103 of 1926	40
174. Act 50 of 1932	39
175. Act 314 of 1940	38
176. Act 10 of Extra Session of 1940	37
177. Act 143 of 1942	36
178. Act 78 of 1946	35
179. Act 51 of 1948	34
180. Act 92 of 1956	33

181. Copy of portion of Map of Louisiana attached to Act 452 of 1962	48
182. Act 53 of 1958	32
183. Act 452 of 1962	31
184. Louisiana Revised Statutes 56: 491 through 526	30
185. Gulf Coast Shrimp, Fish & Oyster Data September, 1954, United States Fish & Wildlife Service	227
186. Examples of records of trials and arrest records from Louisiana Wild Life and Fisheries Commission	828
187. Statement of W. S. Werlla	829
188. Statement of James N. McConnell	830
189. Statement of Julius L. Book dated December, 1956	831
190. Statement of Julius L. Book dated November, 1956	832
191. Statement of R. L. Eddy, Jr.	833
192. Statement of Louis R. Cabirac	834
193. Statement of J. C. DeArmas, Jr.	835
194. Deposition of Captain Emanuel Von Lubbe	1145
195. Deposition of Samuel J. Nunez	1146
196. Deposition of Landry Cheramie	1147
197. Deposition of Chin Dy Hoy	1148
198. Deposition of Abraham Schouest	1149

VOLUME 5

199. Letter from W. S. Werlla dated February 2, 1948	274
200. Enforcement Division from Second Biennial Report of the Department of Wild Life & Fisheries—1946 & 1947	275
201. Division of Enforcement for 1954 & 1955 from Biennial Report of the Department of Wild Life & Fisheries	276
202. Airplane Activity Report from Second Biennial Report of the Department of Wild Life & Fisheries—1946 & 1947	277
203. Act 117 of 1855	232
204. Act 13 of 1871	233
205. Act 24 of 1910	234
206. Act 132 of 1910	235
207. Act 172 of 1910	236
208. Act 196 of 1910	237
209. Act 254 of 1910	238
210. Act 183 of 1912	239
211. Act 258 of 1912	240
212. Act 42 of 1914	241
213. Act 271 of 1914	242
214. Act 30 of 1915	243
215. Act 10 of 1916	244

216. Act 20 of 1918	245
217. Act 105 of 1918	246
218. Act 106 of 1918	247
219. Act 268 of 1918	248
220. Act 250 of 1920	249
221. Act 252 of 1924	250
222. Act 253 of 1924	251
223. Act 68 of 1932	252
224. Act 206 of 1932	253
225. Act 93 of 1936	254
226. Act 210 of 1936	255
227. Act 131 of 1934	256
228. Act 225 of 1936	257
229. Act 80 of 1938	258
230. Act 77 of 1940	259
231. Act 311 of 1940	260
232. Act 153 of 1942	261
233. Act 329 of 1948	262
234. Act 227 of 1944	263
235. Louisiana Revised Statutes 56: 311 through 415	264
236. Distribution of Fishing Effort in Waters Outside the Coast Line of the Northern Gulf of Mexico with Special Reference to Shrimp	265
237. Fishes Taken in the Menhaden	

Fishery of Alabama, Mississippi and Eastern Louisiana	266
238. Tables of Statistics from 1885 to 1956	267
239. Report by Bureau of Commercial Fisheries, United States Depart- ment of Interior, Fish & Wildlife Service, New Orleans, Louisiana, dated September 9, 1968	268
240. Report by H. Roger Hunter, Jr., dated December 13, 1956	269
241. United States Fish & Wildlife Ser- vice Tabulation of Commercial Landings of Fish and Shellfish at ports in Plaquemines Parish, dat- ed September 9, 1968	270
242. Tabulations of Hunting Licenses Sold by Parishes	827
243. Herbert R. Padgett, "Some Phy- sical and Biological Relationships to the Fisheries of the Louisiana Coast," in <i>The Professional Geo- grapher</i> (September, 1966), pp. 423-439	271
244. Act 210 of 1946	272
245. Louisiana Revised Statutes R.S. 56:551 through 561	273
246. Refer the Court to Louisiana Re- vised Statutes 56:1-56:1623 9:1101 9:2791	

14:217	
15:48.1	
30:211-216	1127
247. Act 11 of 1921	278
248. Refer the Court to Louisiana Exhibit 40	401
249. Act 52 of 1921	200
Exhibit 56	State Control Over Seismic Operations, as follows:

STATE CONTROL OVER SEISMIC OPERATIONS

CONTENTS

<i>Description</i>	<i>Louisiana Preliminary Identifying Number</i>
1. Act 77 of 1940	281
2. Act 152 of 1942	282
3. Act 175, Section 2 of 1954	283
4. Seismic Permit No. 2138 dated November 28, 1949	1069
5. Seismic Permit No. 1193 dated June 5, 1947	1070
6. Seismic Permit not numbered dated January 26, 1950	1071
7. Seismic Permit No. 2213 dated January 30, 1950	1072
8. Seismic Permit No. 2214 dated January 30, 1950	1073

9. Seismic Permit No. 1229 dated June 19, 1947	1074
10. Seismic Permit No. 1051 dated December 23, 1946	1075
11. Seismic Permit No. 2231 dated April 4, 1950	1076
12. Seismic Permit No. 2389 dated June 19, 1950	1077
13. Seismic Permit No. 17 dated January 30, 1941	1078
14. Seismic Permit No. 2363 dated July 17, 1950	1079
15. Seismic Permit No. 914 dated August 23, 1946	1080
16. Seismic Permit No. 900-R dated October 25, 1946	1081
17. Seismic Permit No. 1160 dated April 29, 1947	1082
18. Seismic Permit No. 1055 dated January 7, 1947	1083
19. Seismic Permit No. 1077 dated February 3, 1947	1084
20. Seismic Permit No. 535-R dated December 16, 1944	1085
21. Seismic Permit No. 606-R dated July 4, 1945	1086
22. Seismic Permit No. 1454 dated Jan. 13, 1948	1087

23. Seismic Permit No. 1372 dated November 21, 1947	1088
24. Seismic Permit No. 1385 dated December 4, 1947	1089
25. Seismic Permit No. 1421 dated December 29, 1947	1090
26. Seismic Permit No. 1363 dated November 13, 1947	1091
27. Seismic Permit No. 1365 dated November 13, 1947	1092
28. Seismic Permit No. 1452 dated January 13, 1948	1093
29. Seismic Permit No. 1515 dated February 27, 1948	1094
30. Seismic Permit No. 1778 dated November 8, 1948	1095
31. Seismic Permit No. 1558 dated April 6, 1948	1096
32. Seismic Permit No. 1808 dated December 22, 1948	1097
33. Seismic Permit No. 1809 dated December 22, 1948	1098
34. Seismic Permit No. 1080-R dated May 5, 1947	1099
35. Seismic Permit No. 1557 dated April 6, 1948	1100
36. Seismic Permit No. 1571 dated April 15, 1948	1101
37. Seismic Permit No. 1878 dated February 7, 1949	1102

38. Seismic Permit No. 1814 dated December 22, 1948	1103
39. Seismic Permit No. 1209 dated June 12, 1947	1104
40. Seismic Permit No. 1168 dated May 9, 1947	1105
41. Seismic Permit No. 1896 dated February 21, 1949	1106
42. Seismic Permit No. 1639 dated July 6, 1948	1107
43. Seismic Permit No. 1881, approved September 16, 1946, to the California Company	919
44. Seismic Permit No. 2512, approved April 13, 1948, to Shell Oil Company, Inc.	920
45. Seismic Permit No. 2512-R, approved April 13, 1949, to Shell Oil Company, Inc.	921
46. Seismic Permit No. 2512-R, approved April 13, 1949, to Shell Oil Company, Inc.	922
47. Seismic Permit No. 2090-R, approved July 28, 1947, to Shell Oil Company, Inc.	923
48. Seismic Permit No. 1521, approved November 13, 1945, to the California Company	924
49. Seismic Permit No. 2336, approved November 3, 1947, to the Texas Company	925

50. Seismic Permit No. 2348, approved November 24, 1947, to the California Company	926
51. Seismic Permit No. 4814, approved October 26, 1953, to Cities Service Oil Company	927
52. Seismic Permit No. 4999, approved March 23, 1954, to Cities Service Oil Company	928
53. Seismic Permit No. 2389, approved December 22, 1947, to Shell Oil Company, Inc.	929
54. Seismic Permit No. 3051, approved August 5, 1945, to Shell Oil Company, Inc.	930
55. Seismic Permit No. 2430, approved February 2, 1948, to General Geophysical Company	931
56. Seismic Permit No. 3046, approved August 3, 1949, to Shell Oil Company, Inc.	932

Exhibit 57 Oyster Shell Leases, as follows:

OYSTER SHELL LEASES

CONTENTS

<i>Description</i>	<i>Louisiana Preliminary Identifying Number</i>
1. Act 42 of 1914	289
2. R.S. 56:450 and 451	290

3. *The History and Regulation of the Shell Dredging Industry in Louisiana*, Compiled by the Louisiana Wild Life and Fisheries Commission (1968).

71

Exhibit 58 State Control Over Mineral Resources,
as follows:

STATE CONTROL OVER MINERAL RESOURCES

CONTENTS

<i>Description</i>	<i>Louisiana Preliminary Identifying Number</i>
1. State Lease Number 749	481
2. State Lease Number 750	482
3. State Lease Number 751	483
4. State Lease Number 752	484
5. State Lease Number 753	485
6. State Lease Number 754	486
7. State Lease Number 755	487
8. State Lease Number 756	488
9. State Lease Number 1522	489
10. State Lease Number 1523	490
11. State Lease Number 746	491
12. State Lease Number 747	492
13. State Lease Number 749	493
14. State Lease Number 757	494
15. State Lease Number 758	495
16. State Lease Number 759	496

17. State Lease Number 760	497
18. State Lease Number 1395	498
19. State Lease Number 1396	499
20. State Lease Number 1397	500
21. State Lease Number 1398	501
22. State Lease Number 1399	502
23. State Lease Number 1521	503
24. State Lease Number 1798	504
25. State Lease Number 1799	505
26. State Lease Number 1800	506
27. State Lease Number 1801	507
28. State Lease Number 2812	508
29. State Lease Number 2813	509
30. State Lease Number 2814	510
31. State Lease Number 2815	511
32. State Lease Number 2816	512
33. State Lease Number 2817	513
34. State Lease Number 2818	514
35. State Lease Number 998	515
36. State Lease Number 999	516
37. State Lease Number 1007	517
38. State Lease Number 1008	518
39. State Lease Number 1009	519
40. State Lease Number 1010	520
41. State Lease Number 1011	521

42. State Lease Number 1012	522
43. State Lease Number 1388	523
44. State Lease Number 2474	524
45. State Lease Number 997	525
46. State Lease Number 1000	526
47. State Lease Number 1006	527
48. State Lease Number 1013	528
49. State Lease Number 1014	529
50. State Lease Number 1015	530
51. State Lease Number 2592	531
52. State Lease Number 2665	532
53. State Lease Number 2666	533
54. State Lease Number 2667	534
55. State Mineral Lease No. 335, 1936	1203
56. State Mineral Lease No. 188, 1928	1204
57. State Mineral Lease No. 192, 1928	1205
58. State Mineral Lease No. 195, 1928	1206
59. Refer the Court to a map which reflects information concerning areas affected by mineral leases granted by the State of Louisiana as reflected by the records of the Louisiana State Mineral Board since the period of the creation of that Board. It pertains to East Bay.	1064
60. Refer the Court to an exhibit which reflects the same sort of information as does the exhibit bearing La. Preliminary Identifying Number	

1064, except that it pertains to the Caillou Bay Area.	1065
61. Map showing lease block locations in South Pass Area	898
62. U. S. Department of the Interior, Geological Survey, Number, 1950, Mid Continent Map No. 1603	899
63. Pertinent parts of Outer Continen- tal Lease Maps of Louisiana, pub- lished by U. S. Department of the Interior, Bureau of Land Manage- ment	1150
64. A map published by the Depart- ment of Conservation of the State of Louisiana entitled, Oil and Gas Map of Louisiana	1151
65. Map showing lease block locations in Ship Shoal Area	900
66. U. S. Department of the Interior Geological Survey; October, 1950, Mid Continent Map No. 1607, Ship Shoal Area	901
67. Refer the Court to Louisiana Brief Exhibit Number 38	399
68. Refer the Court to Louisiana Brief Exhibit Number 39	400
69. List of well permits prior to 1956	279
70. Cumulative well Completions and Footage Drilled	280

Exhibit 59 Pollution Control, as follows:

POLLUTION CONTROL

CONTENTS

	<i>Description</i>	<i>Louisiana Preliminary Identifying Number</i>
1.	Act 68, Section 12 of 1932	284
2.	Act 367 of 1940	287
3.	Act 385, Section 12 of 1948	285
4.	Act 386, Section 12 of 1948	286
5.	Rules Governing Disposal of Waste Oil, Oil Field Brine, etc.	288
6.	Notes of Jack Hood and pollution regulations	836
Exhibit 60	Vita of Dr. Leo J. Bouchez	
Exhibit 61-A	First drawing or sketch by Dr. Leo J. Bouchez.	
Exhibit 61-B	Second drawing or sketch by Dr. Leo J. Bouchez.	
Exhibit 62	Written opinion of Dr. Leo J. Bou- chez, "The Changing Configuration of the Coast and the Law."	
Exhibit 63	L. J. Bouchez, <i>The Regime of Bays in International Law</i> , A. W. Sythoff- Leyden (1964).	
Exhibit 64	LPI 827-A—Data sheet compiled from Gulf Coast Shrimp Data of the U. S. Department of the Interior, on shrimp boat trips	
Exhibit 65	Vita of J. Y. Christmas	

- Exhibit 66** LPI—Yu. A. Torin, "Oceanographic Conditions and Fishing in the Gulf of Mexico During Autumn and Winter," (Okeonologicheskije usloviya i promysel ryby v. Meksikanskom zalive v. oseene-zimii period), in *Trudy Atlanticheskogo Nauchno-Issledovatel' skogo Instituta Rybnogo Khozyaistva i Okeanografii Atlan-NIRO*, No. 11, p. 4-11 (1964)
- Exhibit 67** LPI 841—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 48; 4,168; 249; 3400; 3257; 3401; 301; 315; 313; 317; 3420; 303; 335; 640; 3403; 3408; 3406; 3422; 3398.
- Exhibit 68** LPI 46—Copy of certified copy of oyster lease map of South Pass and East Bay
- Exhibit 69** LPI 846—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 52; 49; 43; 50; 2787
- Exhibit 70** LPI 842—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 349; 353; 386; 342; 334; 351; 348; 350; 346; 383; 384; 387; 382; 385; 388; 352; 341; 343; 347
- Exhibit 71** LPI 839—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 5013 and 4482.

- Exhibit 72** LPI 843—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 311; 314; 320
- Exhibit 73** LPI 845—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 321; 56; 321; 302; 296; 310
- Exhibit 74** LPI 844—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 7053; 7039; 6032; 9337; 8252; 4061; 8251; 8690; 9338
- Exhibit 75** LPI 847—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 7164; 4042
- Exhibit 76** LPI 848—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 7641; 7175; 11,896; 7095; 7039; 7053
- Exhibit 77** LPI 838—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of lease 18,330
- Exhibit 78** LPI 840—Part of map from records of Louisiana Wild Life and Fisheries Commission showing location of leases 11,639; 11,638; 11,640; 11,641; 11,637; 11,642; 14,461; 14,240
- Exhibit 79** Louisiana Oyster Lease No. 334

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|-------------------|--|
| Exhibit 80 | Louisiana Oyster Lease No. 18330 |
| Exhibit 81 | Louisiana Oyster Lease No. 301 |
| Exhibit 82 | Louisiana Oyster Lease No. 654 |
| Exhibit 83 | Louisiana Oyster Lease No. 5013 |
| Exhibit 84 | Louisiana Oyster Lease No. 4482 |
| Exhibit 85 | Louisiana Oyster Lease No. 3257 |
| Exhibit 86 | LPI 1222—Certified copies of parts of the file of State Mineral Lease 579 |
| Exhibit 87 | LPI 1223—Certified copies of parts of the file of State Mineral Lease 580 |
| Exhibit 88 | LPI 1221—Certified copies of parts of the file from State Mineral Lease 335 |
| Exhibit 89 | LPI 1220—Certified copies of documents comprising parts or portions of the file, State Mineral Lease 195 |
| Exhibit 90 | LPI 1219—Certified copies of documents comprising parts of the file, State Land Lease 192 |
| Exhibit 91 | LPI 1218—Certified copies of documents comprising parts or portions of the file of the State Mineral Lease 188 |
| Exhibit 92 | LPI 1217—Certified copies of excerpts from index book at the State Land Office of Louisiana pertaining to State Mineral Lease Nos. 188, 192, 195, 335, 579 and 580 |

Exhibit 93

LPI 1170 through 1176 as follows:
 LPI 1170—Plat of T. 22 and 23 S., R. 32 E., Louisiana Meridian, approved Sept. 25, 1875
 LPI 1171—Plat of T. 22 S., R. 32 E. Louisiana Meridian, approved December 8, 1842
 LPI 1172—Plat of T. 21 and 22 S., R. 19 E. St. Helena meridian, approved July 16, 1832
 LPI 1173—Plat of T. 24 S., R. 32 and 33 E. Louisiana meridian, approved Sept. 25, 1875
 LPI 1174—Plat of T. 22 S., R. 31 E., Louisiana meridian, approved December 8, 1842
 LPI 1175—Plat of T. 24 S., R. 30 and 31 E., Louisiana meridian, approved May 18, 1842
 LPI 1176—Plat of T. 23 S., R. 31 and 32 E. Louisiana meridian, approved Dec. 8, 1842

Exhibit 94

LPI 1184—Copy of quadrangle map entitled "South Pass Quadrangle"

Exhibit 95

LPI 1064—This is a map which reflects information concerning areas affected by mineral leases granted by the State of Louisiana as reflected by the records of the Louisiana State Mineral Board since the period of the creation of that Board. It pertains to East Bay.

Exhibit 96

LPI 1065—This exhibit reflects the same sort of information as does the

exhibit bearing Louisiana Preliminary Identifying Number 1064, except that it pertains to the Caillou Bay area

- Exhibit 97** LPI 1025—Map showing outer limit of areas claimed as the minimum extent of inland waters Louisiana would be entitled to under issues 1A through E
- Exhibit 98** LPI 1027—Maps and other materials showing location of Inland Water Lines designated and defined under the Act of February 19, 1895
- Exhibit 99** LPI 53—Copy of Chart No. 194, Edition 8, date, September, 1901.
- Exhibit 100** LPI 899—U. S. Department of the Interior, Geological Survey, November, 1950, Mid Continent Map No. 1603
- Exhibit 101** LPI 901—U. S. Department of the Interior, Geological Survey; October, 1950, Mid Continent Map No. 1607, Ship Shoal Area
- Exhibit 102** LPI 900—Map showing lease block locations in Ship Shoal Area
- Exhibit 103** LPI 898—Map showing lease block locations in South Pass area
- Exhibit 104** LPI 1059—This exhibit contains a collection of cartographic materials relating to the Ascension-Barataria Bay area 7 and 10 of the statement of issues. It shows possible overlarge

closing lines and related contentions of Louisiana, plus alternative contentions of Louisiana within this area; and related data

- Exhibit 105** Page 2 of Biennial Report of State Mineral Board dated June, 1950
- Exhibit 106** LPI 336—Report of John Jay to the President of Congress from Madrid, May 26, 1780, letter dated May 11, 1780, pp. 722-725
- Exhibit 107** LPI 337—Communications of the Honorable the French Minister to a Committee of Congress at a Second Conference, February 2, 1780, pp. 488-490
- Exhibit 108** LPI 335—Proceedings of Congress as to conditions of pacification and particularly as to the Mississippi and Fisheries, February 23, 1779, pp. 58-61
- Exhibit 109** LPI 338—Congress—Proceedings as to the Conditions of Pacification and particularly as to the Mississippi and the Fisheries, September 17, 1779, pp. 324-326
- Exhibit 110** LPI 340—Vol. IV, John Jay to the President of Congress, November 6, 1780, excerpt pp. 134-138
- Exhibit 111** LPI 339—Vol. IV, Letter of Benjamin Franklin to John Jay, October 2, 1780, pp. 74-76
- Exhibit 112** LPI 341—Vol. IV, John Jay to the

President of Congress, October 3, 1781, excerpt pp. 742-745

Exhibit 113

LPI 348—*The Debates and Proceedings of the Congress of the United States* with an appendix containing important state papers and public documents and all the laws of a public nature. 7th Congress, 2nd Session from December 6, 1802, to March 3, 1803, Vol. 12, Washington: Gale & Seaton, 1851. Mr. Madison to Charles Pinckney, November 27, 1802, pp. 1058-1059

Exhibit 114

LPI 351—*The Debates and Proceedings of the Congress of the United States* with an appendix containing important state papers and public documents and all the laws of a public nature. 7th Congress, 2nd Session from December 6, 1802, to March 3, 1803, Vol. 12, Washington: Gale & Seaton, 1851. The Purchase of Louisiana, January 1803, pp. 370-374

Exhibit 115

LPI 345—*American State Papers, Documents, Legislative and Executive, of the Congress of the United States*, from the 1st Session of the 1st to the 3rd Session of the 13th Congress, inclusive: commencing March 3, 1789 and ending March 3, 1815. Walter Lowrie, & Matthew St. Clair Clarke, eds., Foreign Relations, Vol. II, Washington: Published by Gale & Seaton, 1832, No. 18 France

and Spain—Louisiana 7th Congress, 2nd Session Robert R. Livingston to the Secretary of State No. 3, January 7, 1802, pp. 536-537. Footnote in book: "The date should, no doubt, be 1803."

Exhibit 116 LPI 355—H. A. Washington, *The Writings of Thomas Jefferson, Volume IV*, Taylor & Maury, (1854) pp. 456-460. Letter to M. Dupont, February 1, 1803.

Exhibit 117 LPI 354—Treaty for the Cession of Louisiana, April 30, 1803, 8 Stat. 200-7.

Exhibit 118 LPI 352—*The Debates and Proceedings of the Congress of the United States*, Eleventh Congress, Third Session, December 3, 1810 to March 3, 1811, Washington: Gales & Seaton, 1853. "An act to enable the people of the Territory of Orleans to form a constitution and State Government, and for the admission of such State into the Union, on an equal footing with the original states and for other purposes," pp. 1326-8

Exhibit 119 LPI 353—*The Debates and Proceedings of the Congress of the United States*, Twelfth Congress, First Session, November 4, 1811 to July 6, 1812, Washington: Gales & Seaton, 1853. "An act for the admission of the State of Louisiana into the Union

and to extend the laws of the U. S. to the said State," pp. 2264-2266

- Exhibit 120** Map 4 of 8 of the Set of 54 maps
Exhibit 120-A Map 5 of 8 of the Set of 54 maps
Exhibit 120-B Map 6 of 8 of the Set of 54 maps
Exhibit 121 Photograph album of Curtis L. Buttorff, containing the following series of photographs:

Description of Louisiana Exhibit 121—Series of Photographs

1. 902-22; LPI 992; Corps of Engineers; 3 October 1929
 902-68; LPI 994; Corps of Engineers; 3 October 1929
2. INO-1-157; Corps of Engineers; 14 October 1940
3. 20V311RWM1063; United States Exhibit; 1 October 1946
4. M-17-88-3; Corps of Engineers; 5 June 1949
5. 724-193; United States Exhibit; 1 July 1954
6. 24-116; LPI 537; Corps of Engineers; 29 February 1956
7. L596; C. & G. S.; 23 October 1956
8. L6948; C. & G. S.; 11 October 1958
9. 144; LPI 544; Corps of Engineers; 8 November 1959
10. L8728; C. & G. S.; 30 November 1959
11. L9121; C. & G. S.; 7 December 1959
12. O932; C. & G.S.; 23 October 1956

13. 61; LPI 546; Corps of Engineers; 13 October 1960
62; LPI 547; Corps of Engineers; 13 October 1960
14. 112; LPI 550; Corps of Engineers; 17 October 1961
15. 75; Corps of Engineers; 23 November 1962
16. 5-1032; Corps of Engineers; 18 September 1965
17. S8995; C. & G.S.; 8 October 1965
18. 6-12; Source unknown; 23 February 1967
19. 59-61; LPI 562; Corps of Engineers; 15 November 1969
20. E4977; C. & G. S.; 30 January 1970
21. 4873; C. & G.S.; 24 January 1970
22. 8181R; C. & G. S.; 24 January 1970
23. 8281R; C. & G. S.; 30 January 1970

Exhibit 121-A Dr. James P. Morgan overlay of Figure 2 from Exhibit 6

Exhibit 121-B Photos—Stereo Partners, as follows:

Louisiana Exhibit 121B—Series of Photographs

1. INO-1-158; Corps of Engineers
2. 24 January 1970; L8182R; C. & G. S.
3. 30 January 1970; E4976; C. & G. S.
4. 30 November 1959; L8727; C. & G. S.
5. 7-59-145; Corps of Engineers; LPI 545
6. 30 January 1970; L8280R; C. & G. S.
7. 15 November 1969; 59-64; Corps of Engineers; LPI 564

8. 6-61-113; Corps of Engineers; LPI 551
9. 23 October 1956; L595; C. & G. S.
10. 9-60-61; Corps of Engineers; LPI 546
11. 1 October 1946; 21V311RWM1063 16PS 6P183
12. 18 September 1965; 5-1031; Corps of Engineers
13. 12-62-74; Corps of Engineers
14. 29 February 1956; 24-115 P-55; Corps of Engineers; LPI 536
15. 1-7-54; 724-192; Corps of Engineers
16. 8 October 1965; S8996; C. & G. S.
17. 1-7-54; 724-192; Corps of Engineers

Exhibit 122 1895 Chart No. 194

Exhibit 123 LPI-1144, Depositions of Dr. A. Joseph Wraight and Mr. James F. Richardson

E X H I B I T S

- W-1 October 3, 1969, letter to Mr. Frederick W. Ellis from Wraight
- RW-2 May 26, 1969, Chart No. 1272 (with markings)
- R-1 October 29, 1935, Chart No. 1272, see Exh. 164
- R R-2 H-6172
- R R-3 H-6513
- R R-4 H-6492 (copy of portion)
- R R-5 H-6492 (film 1:30,000)
- R R-6 T-5407
- R R-7 May 26, 1969, Chart No. 1272 (clean)

- Exhibit 124** December 6, 1969, edition of Chart No. 1272
- Exhibit 125** LPI 1010—Copy of letter and report from Mr. Leo W. Hough, State of Louisiana, Department of Conservation, Louisiana Geological Survey, dated July 31, 1970
- Exhibit 126** Drilling Activity in East Bay and Caillou Bay before Interim Agreement of October 12, 1956
- Exhibit 127-A** C. & G. S. Photo No. L-9090, 7 December 1959
- Exhibit 127-B** C. & G. S. Photo No. L-9091, 7 December 1959
- Exhibit 127-C** C. & G. S. Photo No. L-9092, 7 December 1959
- Exhibit 128-A** C. & G. S. Photo No. L-8987, 3 December 1959
- Exhibit 128-B** C. & G. S. Photo No. L-8988, 3 December 1959
- Exhibit 129-A** C. & G. S. Photo No. L-9031, 3 December 1959
- Exhibit 129-B** C. & G. S. Photo No. L-9032, 3 December 1959
- Exhibit 129-C** C. & G. S. Photo No. L-9033, 3 December 1959
- Exhibit 129-D** C. & G. S. Photo No. L-9034, 3 December 1959
- Exhibit 130** Affidavit by Mr. Frank J. Williams

- identifying Sheet 38 of Louisiana Exhibit 21
- Exhibit 131** Overlay of right inset on Chart No. 1272 introduced as Exhibit 8
- Exhibit 132** Illustrative sketch of seasonal mud-lump growth process
- Exhibit 133** LPI 1057—Alternative methods of planimetering area of an indentation are graphically illustrated on this exhibit
- Exhibit 134** LPI 1198—Photo Mosaic—Copies of documents in connection with our answers and objections to the First Formal Interrogatories of the United States and the related Requests for Admissions in globo
- Exhibit 134-A** Mosaic 21
- Exhibit 134-B** Mosaic 22
- Exhibit 134-C** Mosaic 23
- Exhibit 134-D** Mosaic 24
- Exhibit 134-E** Mosaic 25
- Exhibit 134-F** Mosaic 26
- Exhibit 135** LPI 360—Samuel H. Lockett, *Louisiana As It Is*. Baton Rouge: Louisiana State University Press (1969). The original manuscripts of this geological survey were written in 1876 and 1891.
- Exhibit 136** LPI 1011 - Copy of picture of Southwest Pass on wall at Lou-

isiana State University School of
(Geoscience

- Exhibit 137** LPI 55 - Copy of a letter from the Liddell (Moses St. John R. and Family) Papers in the Department of Archives and Manuscripts of Louisiana State University
- Exhibit 138** LPI 56 - Copy of page from the "Daily Picayune" of Thursday morning, August 14, 1856, obtained from Library of Louisiana State University
- Exhibit 139** LPI 57 - Copy of page from the "Daily Picayune" of Friday morning, August 15, 1856, obtained from Library of Louisiana State University
- Exhibit 140** LPI 58 - Copy of page from the "Daily Picayune" of Saturday morning, August 16, 1856, obtained from Library of Louisiana State University
- Exhibit 141** LPI 59 - Copy of page from the "Daily Picayune" of Saturday morning, August 16, 1856, obtained from Library of Louisiana State University
- Exhibit 142** LPI 60 - Copy of page from the "Daily Picayune" of Monday afternoon, August 18, 1856, obtained from Library of Louisiana State University

- Exhibit 143** LPI 61 - Copy of page from the "Daily Picayune" of Wednesday morning, August 20, 1856, obtained from Library of Louisiana State University
- Exhibit 144** LPI 62 - Copy of page from the "Daily Picayune" of Wednesday morning, August 20, 1856, obtained from Library of Louisiana State University
- Exhibit 145** LPI 1146 - Deposition of Mr. Samuel J. Nunez
- Exhibit 146** LPI 1148 - Deposition of Mr. Chin D. Hoy
- Exhibit 147** LPI 1149 - Deposition of Mr. Abraham Schouest
- Exhibit 148** LPI 1144 - Deposition of Mr. Samuel Von Lubbe
- Exhibit 149** LPI 1147 - Deposition of Mr. Landry Cheramie
- Exhibit 150** All of Louisiana's Requests for Admissions and Interrogatories and Answers thereto directed to the United States.
- Exhibit 151** LPI 903 - Pertinent parts of 1837 map of the Alluvial Valley of the Mississippi River
- Exhibit 152** LPI 358 - *Sovereignty of the Sea*, U. S. Department of State, Geographic Bulletin No. 3 (April, 1965)

- Exhibit 153** LPI 359 - *Sovereignty of the Sea*, U. S. Department of State, Geographic Bulletin No. 3, rev. (October, 1969)
- Exhibit 154** LPI 1132 - Whiteman, *Digest of International Law*, Vol. 4, U. S. Dept. State No. 7825 (April, 1965)
- Exhibit 155** LPI 1142 - U. S. Coast & Geodetic Survey Chart No. 1
- Exhibit 156** LPI 1137 - Willard Bascom, *WAVES AND BEACHES: THE DYNAMICS OF THE OCEAN SURFACE*, Doubleday & Co., Inc. (1964)
- Exhibit 157** LPI 897 - Map of Survey of the United States Coast, Section VIII, made in 1853 by F. H. Gerdes
- Exhibit 158** LPI 1 - Nautical Chart No. 94, 3rd Edition, Published June, 1877, by U.S.C.&G.S.
- Exhibit 159** LPI 2 - Nautical Chart No. 194, 13th Edition, Published December 20, 1918, by U.S.C.&G.S.
- Exhibit 160** LPI 3 - Nautical Chart No. 194, 15th Edition, Published November 19, 1924, by U.S.C.&G.S.
- Exhibit 161** LPI 4 - Nautical Chart No. 1272, 1st Edition, Published February 12, 1925, by U.S.C.&G.S.
- Exhibit 162** LPI 5 - Nautical Chart No. 1272, 3rd Edition, Published January 11, 1933, by U.S.C.&G.S.

- Exhibit 163** LPI 6 - Nautical Chart No. 1272, 5th Edition, Published September 28, 1934, by U.S.C.&G.S.
- Exhibit 164** LPI 7 - Nautical Chart No. 1272, 6th Edition, Published October 29, 1935, by U.S.C.&G.S.
- Exhibit 165** LPI 8 - Nautical Chart No. 1272, 7th Edition, Published April 1, 1944, by U.S.C.&G.S.
- Exhibit 166** LPI 9 - Nautical Chart No. 1272, 9th Edition, Published March 31, 1947, by U.S.C.&G.S.
- Exhibit 167** LPI 10 - Nautical Chart No. 1272, 9th Edition, Published August 22, 1955, by U.S.C.&G.S.
- Exhibit 168** LPI 11 - Nautical Chart No. 1272, 9th Edition, Published September 17, 1956, by U.S.C.&G.S.
- Exhibit 169** LPI 52 - Copy of Chart No. 94, Edition 1, date, 1873
- Exhibit 170** LPI 54 - Copy of Chart No. 194, Edition 10, dated July, 1910
- Exhibit 171** LPI 291 - Photostatic copy of Connelly Field Notes
- Exhibit 172** LPI 292 - Letter from Mr. Seymour Lowman, Assistant Secretary of the Treasury to the Secretary of State, dated June 4, 1929
- Exhibit 173** LPI 1214 - Edward W. Orton, "A Geological Study of Marsh Island, Iberia Parish, Louisiana," Techni-

cal Report of Louisiana Wild Life and Fisheries Commission (1959)

Exhibit 173-A

Attachments to Exhibit 173 - LPI 1214

Exhibit 174

LPI 293 - 1940, Chart No. 2, p. 1 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 294 - 1941, Chart No. 2, p. 1 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 295 - 1942, Chart No. 2, p. 1 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 296 - 1943, Chart No. 2, p. 1 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 297 - 1944-1945, Chart No. 2, p. 3 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 298 - 1946, Chart No. 2, p. 3 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 299 - 1947, Chart No. 2, p. 3 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 300 - 1948, Chart No. 2, p. 3
from charts of the U. S. Bureau of
the Census, *Statistical Abstract of
the United States*

LPI 301 - 1949, Chart No. 2, p. 3
from charts of the U. S. Bureau of
the Census, *Statistical Abstract of
the United States*

LPI 302 - 1950, Chart No. 2, p. 5
from charts of the U. S. Bureau
of the Census, *Statistical Abstract
of the United States*

LPI 303 - 1951, Chart No. 2, p. 5
from charts of the U. S. Bureau
of the Census, *Statistical Abstract
of the United States*

LPI 304 - 1952, Chart No. 4, p. 7
from charts of the U. S. Bureau
of the Census, *Statistical Abstract
of the United States*

LPI 305 - 1953, Chart No. 4, p. 10
from charts of the U. S. Bureau of
the Census, *Statistical Abstract of
the United States*

LPI 306 - 1954, Chart No. 4, p. 10
from charts of the U. S. Bureau
of the Census, *Statistical Abstract
of the United States*

LPI 307 - 1955, Chart No. 4, p. 9
from charts of the U. S. Bureau of
the Census, *Statistical Abstract of
the United States*

LPI 308 - 1956, Chart No. 190, p. 158 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 309 - 1957, Chart No. 195, p. 158 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 310 - 1958, Chart No. 200, p. 160 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 311 - 1959, Chart No. 206, p. 160 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 312 - 1960, Chart No. 206, p. 160 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 313 - 1961, Chart No. 212, p. 161 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 314 - 1962, Chart No. 220, p. 170 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 315 - 1963, Chart No. 226, p. 173 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 316 - 1964, Chart No. 228, p. 169 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 317 - 1965, Chart No. 232, p. 168 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 318 - 1966, Chart No. 242, p. 171 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 319 - 1967, Chart No. 252, p. 174 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 320 - 1968, Chart No. 245, p. 167 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 321 - 1969, Chart No. 243, p. 163 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

Exhibit 175

LPI 322 - 1956, Chart No. 192, p. 159 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 323 - 1957, Chart No. 197, p. 159 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 324 - 1958, Chart No. 202, p. 161 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 325 - 1959, Chart No. 207, p. 161 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 326 - 1960, Chart No. 208, p. 161 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 327 - 1961, Chart No. 214, p. 162 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 328 - 1962, Chart No. 222, p. 171 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 329 - 1963, Chart No. 228, p. 174 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 330 - 1964, Chart No. 230, p. 170 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 331 - 1965, Chart No. 234, p. 169 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 332 - 1966, Chart No. 244, p. 172 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 333 - 1967, Chart No. 254, p. 175 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

LPI 334 - 1968, Chart No. 248, p. 169 from charts of the U. S. Bureau of the Census, *Statistical Abstract of the United States*

Exhibit 176

LPI 1212 - G. Etzel Percy, "Measurement of the United States Territorial Sea," *Department of State Bulletin*, No. 1044 (June 29, 1959)

Exhibit 177

LPI 1131 - E. L. Corthell, *A History of the Jetties at the Mouths of the Mississippi River*, New York: John Wiley and Sons, 2d ed. (1881).

**Exhibit 178
(Accession file)**

LPI 918 - File from records of United States Coast & Geodetic Survey treated in 1 Shalowitz *Shore & Sea Boundaries*

Exhibit 178-A

Copies of correspondence re Acc. File

Exhibit 179

Pages 503 through 507 of Humphrey and Abbot, Appendix A

Exhibit 180

LPI 1055 - This exhibit also pertains to East Bay and contains data and measurement information

associated with various maps of the period 1918 through the 1960's. The various components of the exhibit also reflect alternative natural entrance points and measurement data related to certain land forms not treated in the exhibit identified by Louisiana Preliminary Identifying No. 1054

Exhibit 181-A	Chart 1272, 21st Edition
Exhibit 181-B	Chart 1273, 9th Edition
Exhibit 181-C	Chart 1274, 10th Edition
Exhibit 181-D	Chart 1275, 1970 Edition
Exhibit 182-A	LPI 73 - Color Photograph - Photo No. TL-13 dated June 26, 1969
Exhibit 182-B	LPI 74 - Color Photograph - Photo No. TL-14 dated June 26, 1969
Exhibit 182-C	LPI 83 - Color Photograph - Photo No. T-36 dated June 26, 1969
Exhibit 182-D	LPI 86 - Color Photograph - Photo No. TL-39 dated June 26, 1969
Exhibit 182-E	LPI 94 - Color Photograph - Photo No. TL-51 dated June 26, 1969
Exhibit 182-F	LPI 101 - Color Photograph - Photo No. TL-65 dated August 27, 1969
Exhibit 182-G	LPI 103 - Color Photograph - Photo No. TL-83 dated August 27, 1969
Exhibit 182-H	LPI 106 - Color Photograph - Photo No. TL-97 dated August 27, 1969

Exhibit 182-I	LPI 107 - Color Photograph - Photo No. TL-99 dated August 27, 1969
Exhibit 182-J	LPI 108 - Color Photograph - Photo No. TL-100 dated August 27, 1969
Exhibit 182-K	LPI 109 - Color Photograph - Photo No. TL-101 dated August 27, 1969
Exhibit 182-L	LPI 110 - Color Photograph - Photo No. TL-102 dated August 27, 1969
Exhibit 182-M	LPI 111 - Color Photograph - Photo No. TL-113 dated August 27, 1969
Exhibit 182-N	LPI 114 - Color Photograph - Photo No. TL-116 dated August 27, 1969
Exhibit 182-O	LPI 115 - Color Photograph - Photo No. TL-117 dated August 27, 1969
Exhibit 182-P	LPI 126 - Color Photograph - Photo No. TL-136 dated August 27, 1969
Exhibit 182-Q	LPI 130 - Color Photograph - Photo No. TL-142 dated August 27, 1969
Exhibit 182-R	LPI 138 - Color Photograph - Photo No. TL-193 dated September 3, 1969
Exhibit 182-S	LPI 139 - Color Photograph - Photo No. TL-196 dated September 3, 1969
Exhibit 182-T	LPI 141 - Color Photograph - Photo No. TL-202 dated September 3, 1969
Exhibit 182-U	LPI 142 - Color Photograph - Photo No. TL-204 dated September 3, 1969

- Exhibit 182-V** LPI 153 - Color Photograph - Photo No. TL-217 dated September 3, 1969
- Exhibit 182-W** LPI 155 - Color Photograph - Photo No. TL-219 dated September 3, 1969
- Exhibit 182-X** LPI 156 - Color Photograph - Photo No. TL-220 dated September 3, 1969
- Exhibit 182-Y** LPI 157 - Color Photograph - Photo No. TL-213 dated September 3, 1969
- Exhibit 182-Z** LPI 159 - Color Photograph - Photo No. TL-225 dated September 3, 1969
- Exhibit 182-AA** LPI 161 - Color Photograph - Photo No. TL-227 dated September 3, 1969
- Exhibit 182-AB** LPI 162 - Color Photograph - Photo No. TL-228 dated September 3, 1969
- Exhibit 182-AC** LPI 164 - Color Photograph - Photo No. TL-230 dated September 3, 1969
- Exhibit 182-AD** LPI 165 - Color Photograph - Photo No. TL-231 dated September 3, 1969
- Exhibit 182-AE** LPI 166 - Color Photograph - Photo No. TL-232 dated September 3, 1969
- Exhibit 182-AF** LPI 169 - Color Photograph - Photo

- No. TL-241 dated September 3, 1969
- Exhibit 182-AG** LPI 171 - Color Photograph - Photo No. TL-244 dated September 3, 1969
- Exhibit 182-AH** LPI 172 - Color Photograph - Photo No. TL-245 dated September 3, 1970
- Exhibit 182-AI** LPI 173 - Color Photograph - Photo No. TL-246 dated September 3, 1969
- Exhibit 182-AJ** LPI 174 - Color Photograph - Photo No. TL-247 dated September 3, 1969
- Exhibit 182-AK** LPI 179 - Color Photograph - Photo No. TL-264 dated October 2, 1969
- Exhibit 182-AL** LPI 181 - Color Photograph - Photo No. TL-266 dated October 2, 1969
- Exhibit 182-AM** LPI 609 - Photograph - TL-O(32) 2 dated June 24, 1967, Jetties at mouth of Belle Pass outlet of Bayou LaFourche
- Exhibit 182-AN** LPI 610 - Photograph - TL-O(34) 1 dated June 24, 1967, Ground view showing exhumed marsh in retreating beach area, Timbalier Island, Louisiana
- Exhibit 182-AO** LPI 953 - Photograph by Dr. James P. Morgan of different parts of the Louisiana coastal area

- Exhibit 182-AP** LPI 1005 - Photograph from the files of Dr. James P. Morgan
- Exhibit 183** **NOTE: EXHIBIT 183-A THROUGH 183-V WERE WITHDRAWN. THEY APPEAR IN LOUISIANA EXHIBIT 21.**
- Exhibit 183-W** LPI 959 - Photograph TL-284 dated October 2, 1969. Different parts of the Louisiana coastal area
- Exhibit 183-X** LPI 973 - Photograph TL-299 dated October 2, 1969. Different parts of the Louisiana coastal area
- Exhibit 183-Y** LPI 988 - Photograph TL-283 dated October 2, 1969. Different parts of the Louisiana coastal area
- Exhibit 183-Z** LPI 991 - Photograph TL-287 dated October 2, 1969. Different parts of the Louisiana coastal area
- Exhibit 184-A** LPI 611 - Photograph M-100-8 dated June 26, 1969, View Southwest showing mouth of Pass Tante Phine
- Exhibit 184-B** LPI 612 - Photograph M-100-10 dated June 26, 1969, View west showing peninsula extending south toward mouth of Pass Du Bois
- Exhibit 184-C** LPI 613 - Photograph M-100-12 dated June 26, 1969, View toward the Northwest showing the west end of Pass Du Bois and the peninsula to the north

- Exhibit 184-D** LPI 614 - Photograph M-100-13 dated June 26, 1969, View looking southwest along the sand spit on the east side of Southwest Pass, Mississippi Delta
- Exhibit 184-E** LPI 615 - Photograph M-100-15 dated June 26, 1969, Mouth of South Pass, Mississippi Delta. Sand spit, mudlump islands No. 89-90 and new smaller lumps shown in the foreground View toward the north
- Exhibit 184-F** LPI 616 - Photograph M-101-4 dated June 26, 1969, South Pass mudlumps and sand spit, Mississippi Delta. Mudlump 93 on left of photo. Mudlump 89-90 in the central part of photo and new mudlumps offshore in right central part of photo. The distinct fresh water-salt water boundary line shown in the foreground
- Exhibit 184-G** LPI 619 - Photograph M-101-7 dated June 26, 1969, Mouth of Southeast Pass, Mississippi Delta, and mudlump islands in right middle ground. View toward the north.
- Exhibit 184-H** LPI 620 - Photograph M-101-8 dated June 26, 1969, Balize Peninsula in the background and Balize Bayou mudlumps in the foreground. View looking generally north.

- Exhibit 184-I** LPI 621 - Photograph M-101-12 dated June 26, 1969, View toward the northwest showing the mouth of Pass A Loutre in the background and Pass A Loutre mudlumps in the foreground
- Exhibit 184-J** LPI 622 - Photograph M-101-16 dated June 26, 1969, View toward the north, showing a crevasse or splay extending into Blind Bay from the south side of Pass A Loutre, Mississippi Delta
- Exhibit 184-K** LPI 623 - Photograph M-103-13 dated September 3, 1969, View west showing breaches in the sand spit on the east side of Southwest Pass, Mississippi Delta
- Exhibit 184-L** LPI 624 - Photograph M-103-16 dated September 3, 1969, View north showing the north end of the sand spit on the east side of Southwest Pass, Mississippi Delta
- Exhibit 184-M** LPI 625 - Photograph M-104-5 dated September 3, 1969, View toward the northwest showing the marsh on the west side of South Pass, Mississippi Delta. See M-104-6 for comparison.
- Exhibit 184-N** LPI 626 - Photograph M-104-6 dated September 3, 1969, View northwest showing marsh on the west side of South Pass, Missis-

ssippi Delta. Compare with M-104-5

Exhibit 184-O

LPI 627 - Photograph M-104-10 dated September 3, 1969, View northeast showing the marsh and natural levees on the west side of South Pass. Note small residual islands in foreground of photograph

Exhibit 184-P

LPI 628 - Photograph M-104-11 dated September 3, 1969, Natural levee and marsh along west bank of South Pass, Mississippi Delta. View toward the northeast showing small residual islands in foreground of photograph

Exhibit 184-Q

LPI 629 - Photograph M-104-12 dated September 3, 1969, Natural levee and marsh along west bank of South Pass, Mississippi Delta. View toward the northeast showing small residual islands in foreground of photograph

Exhibit 184-R

LPI 630 - Photograph M-104-15 dated September 3, 1969, View toward the west showing the mouth of Southwest Pass and sand spit extending into East Bay, Mississippi Delta

Exhibit 184-S

LPI 631 - Photograph M-104-16 dated September 3, 1969, View toward the west showing the natural levees of Southwest Pass near its

mouth and the sand spit extending into East Bay, Mississippi Delta. A photograph showing more detail than M-104-15, including breaches in sand spit caused by Hurricane Camille

Exhibit 184-T

LPI 632 - Photograph M-105-1 dated October 2, 1969, View toward the south of a portion of Isle Derniere, Terrebonne Parish, Louisiana. The inlet in Isle Derniere shown in the center of the photograph is Coupe Colin

Exhibit 184-U

LPI 639 - Photograph M-105-10 dated October 2, 1969, View toward the south showing the marsh and shore line of north shore of Caillou Bay. Note shell material is concentrated in small pockets along the shore line

Exhibit 184-V

LPI 641 - Photograph M-105-12 dated October 2, 1969, View toward the north of marsh land extending inland from Isle Derniere. This view is in the opposite direction from M-105-11

Exhibit 184-W

LPI 643 - Photograph M-105-16 dated October 2, 1969, View toward the east showing the junction of Bayou Grande Caillou and Bayou du Lac, Terrebonne Parish

Exhibit 184-X

LPI 645 - M-53-36

- Exhibit 184-Y** LPI 646 - M-94-2 dated July 26, 1961
- Exhibit 185-A** LPI 1058-A This exhibit pertains to shore line changes in the Isle Derniere area for the period 1853 through 1959, as reflected by various maps or surveys of that period
- Exhibit 185-B** LPI 1058-B - This exhibit pertains to shore line changes in the Caillou Bay-Lake Pelto area for the period 1853 through 1959, as reflected by various maps or surveys of that period
- Exhibit 186** LPI 903 - Pertinent parts of 1887 map of the Alluvial Valley of the Mississippi River in overlay form
- Exhibit 187** Chart 1050 in overlay form
- Exhibit 188-A** LPI 1066-A - This exhibit reflects certain island measurement information pertaining to islands and low water elevations in the Derniere area
- Exhibit 188-B** LPI 1066-B - This exhibit reflects certain island measurement information pertaining to islands and low water elevations in the Shell Keys area.
- Exhibit 189** LPI 1063 - This is a collection of reduced scale nautical charts with an index map. The nautical charts included in the exhibit from which the reduced scale copies were made

for convenience in handling are charts 1268 through 1277, inclusive.

Exhibit 190 Photograph Album No. 4 of Dr. James P. Morgan, as follows:

LIST OF PHOTOGRAPHS TO ACCOMPANY TESTIMONY OF JAMES P. MORGAN CONCERNING PHYSICAL CHARACTERISTICS OF ISLE DERNIER AND CAILLOU BAY.

(All of the photographs included here were taken by James P. Morgan on the dates indicated).

PART I—COLOR PHOTOGRAPHS

<i>Chrono- logic Number of Photo- graph</i>	<i>Louisiana Preliminary Identifying Number</i>	<i>Date of Photo- graphy</i>	<i>Description of Photograph</i>
1	606	June 24, 1967	View west down beach of Isle Derniere, Terrebonne Parish, Louisiana.
2	175	October 2, 1969	View north across Trinity Bay, eastern Isle Derniere, Terrebonne Parish, Louisiana.
3	176	October 2, 1969	View north across central Isle Derniere, Caillou Boca in middle ground.
4	177	October 2, 1969	View northward across central Isle Derniere. Caillou Boca in middle ground.

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|----|-----|-----------------|--|
| 5 | 978 | October 2, 1969 | View looking southwest toward western Isle Derniere with Caillou Boca in foreground marshland of old Bayou MiSale extending out toward island. |
| 6 | 987 | October 2, 1969 | View looking toward the south of western Isle Derniere. The island is in background, Caillou Boca in foreground. |
| 7 | 178 | October 2, 1969 | View northwest across western Isle Derniere. Inlet shown is Coupe Colin. Note new sand spit in foreground. |
| 8 | 183 | October 2, 1969 | View northwest toward Racoon Point western Isle Derniere, showing position of new sand spit. |
| 9 | 607 | June 24, 1967 | View north toward Coupe Colin opening in Isle Derniere with new sand spit in foreground. |
| 10 | 964 | June 24, 1967 | View looking north of western Isle Derniere; new sand spit in foreground; Coupe Colin Inlet in background. |
| 11 | 608 | June 24, 1967 | View east along Isle Derniere, Terrebonne Parish, showing new sand spit seaward and west of Coupe Colin beach. |

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|----|-----|-----------------|---|
| 12 | 180 | October 2, 1969 | View northeast across western Isle Derniere. Coupe Colin Inlet in right rear of photo. New sand spit in foreground. |
| 13 | 182 | October 2, 1969 | View northeast across western Isle Derniere and new sand spit. |
| 14 | 957 | October 2, 1969 | View looking southeast showing water boundary line and its relationship to the north shore of Caillou Bay. |
| 15 | 954 | October 2, 1969 | View looking toward the northeast showing water boundary in Caillou Bay. Position can be determined from Bayou Goreau in central background. |
| 16 | 972 | October 2, 1969 | View looking northeast of north shore of Caillou Bay. Shrimp drying platforms in center of photograph are located near the mouth of Bayou Goreau. |
| 17 | 975 | October 2, 1969 | View looking west of north shore Caillou Bay. Shrimp drying platforms on the shore of Bayou Goreau in background. |
| 18 | 958 | October 2, 1969 | View looking to the east. East Bay Junop in back- |

- ground, Bayou Du West in middle background.
- | | | | |
|----|-----|-----------------|--|
| 19 | 950 | October 2, 1969 | View looking northwest across Pelican Island along north shore of Caillou Bay. East Bay Junop in background, Pelican Pass in right foreground. |
| 20 | 974 | October 2, 1969 | View looking north of north shore of Caillou Bay. Stream on left margin of photo is Taylor's Bayou. East Bay Junop in left rear background of photo. |
| 21 | 187 | October 2, 1969 | View of north shore of Caillou Bay Terrebonne Parish. Bayou Charbon in right background. |
| 22 | 186 | October 2, 1969 | View of north shore of Caillou Bay, Terrebonne Parish. Area west of outlet of Grand Bayou du Large. |
| 23 | 185 | October 2, 1969 | View north showing opening of Grand Bayou du Large into Caillou Bay, Terrebonne Parish. |
| 24 | 184 | October 2, 1969 | View looking northeast showing northeast shore line of Caillou Bay, Terrebonne Parish. |
| 25 | 955 | October 2, 1969 | Another view of water boundary extending out- |

			ward into Caillou Bay from north shore of Caillou Bay.
26	1000	October 2, 1969	Water boundary line extending into Caillou Bay from north shore.
27	952	October 2, 1969	Water boundary line extending into Caillou Bay from north shore.
28	969	October 2, 1969	Water boundary line in Caillou Bay extending almost perpendicular to north shore of Caillou Bay. Details of this boundary are shown on additional photos in this series.

PART II—BLACK AND WHITE PHOTOGRAPHS

<i>Chrono- logic Number of Photo- graph</i>	<i>Louisi- ana Pre- liminary Identify- ing Number</i>	<i>Date of Photo- graphy</i>	<i>Description of Photograph</i>
B & W 1	633	October 2, 1969	View toward the west along Isle Derniere with Racoon Point in the distance. Coupe Colin Inlet in center of photograph and new sand spit on seaward (left) side of island.
B & W 2	640	October 2, 1969	View toward the south with Isle Derniere in the background. Foreground shows

marsh land surrounding old Bayou MiSale. Caillou Boca separates Isle Derniere from marsh land.

- | | | | |
|---------|-----|-----------------|---|
| B & W 3 | 642 | October 2, 1969 | View south showing the marsh land of old Bayou MiSale. Caillou Boca in foreground and Isle Derniere in background. |
| B & W 4 | 636 | October 2, 1969 | View toward the northwest showing the north shore of Caillou Bay and a foam line indicating a water interface in foreground. |
| B & W 5 | 637 | October 2, 1969 | View toward the east showing the north shore of Caillou Bay. Note the abundant shelly material comprising the beach along the border of the marsh land. |
| B & W 6 | 635 | October 2, 1969 | View toward the east showing the north shore of Caillou Bay with a foam line suggesting a water interface in foreground. |
| B & W 7 | 634 | October 2, 1969 | View toward the northeast showing and the north shore of Caillou Bay and a foam line indicating a water interface in Caillou Bay. |
| B & W 8 | 644 | October 2, 1969 | View toward the east, showing north shore of Caillou |

Bay. Note decrease in shell towards the east.

- B & W 9 638 October View east of the north shore
2, 1969 of Caillou Bay, an area
slightly farther to the east
than shown on previous
photograph (B & W 8) Note
lesser amount of shell on
beach.
- Exhibit 190-A** Photo area Index Sheets
- Exhibit 191-A** LPI 993 - U. S. Army Corps of En-
gineers Photo No. 902-25 dated Octo-
ber 3, 1929
- Exhibit 191-B** LPI 995 - U. S. Army Corps of En-
gineers Photo No. 902-550 dated
October, 1929
- Exhibit 191-C** LPI 996 - U. S. Army Corps of En-
gineers Photo No. 902-551 dated
October, 1929
- Exhibit 191-D** LPI 997 - U. S. Army Corps of En-
gineers Photo No. 902-552 dated
October, 1929
- Exhibit 191-E** LPI 998 - U. S. Army Corps of En-
gineers Photo No. 902-553 dated
October, 1929
- Exhibit 191-F** LPI 999 - U. S. Army Corps of En-
gineers Photo No. 902-554 dated
October, 1929
- Exhibit 192** Photograph Album No. 5 of Dr.
James P. Morgan, as follows:

LIST OF PHOTOGRAPHS TO ACCOMPANY TESTIMONY OF JAMES P. MORGAN CONCERNING NATURAL ENTRANCE POINTS AT ATCHAFALAYA BAY.

(All of the accompanying photographs were taken on June 6, 1968 by James P. Morgan and previously submitted as part of Exhibit 68, Appendix G, Map Exhibits and Related Materials for Brief of the State of Louisiana in Support of its Motion for Entry of Supplemental Decree No. 2).

<i>Chronologic Number of Photo- graph</i>	<i>Photo- graph Number and Page</i>	<i>Description of Photograph</i>
1	No. 4, Page 1	Point au Fer with North Island lying to its left and with a pronounced oyster reef formation in the foreground. The oyster reef serves as the eastern natural entrance point of Atchafalaya Bay.
2	No. 5, Page 1	Closer view of the oyster reef formation off Point au Fer. North Island can be seen in the background.
3	No. 6, Page 1	Another view from a different angle of the oyster reef off Point au Fer that is the eastern natural entrance point of Atchafalaya Bay.
4	No. 7, Page 1	Looking west at Point au Fer and the reef structures beyond.

- 5 No. 8, Page 2 Close-up from the ground of the reef formation off Point au Fer that is the eastern natural entrance point of Atchafalaya Bay.
- 6 No. 10, Page 2 Additional ground photograph of reef formation off Point au Fer.
- 7 No. 9, Page 2 Another ground photograph of reef formation off Point au Fer. Point au Fer and intervening reef formations can be seen in the background.
- 8 No. 12, Page 2 Reef formation off Point au Fer with helicopter in the background to show size and extent of reef.
- 9 No. 13, Page 2 Same reef formation stretching out toward the Gulf of Mexico.
- 10 No. 15, Page 2 Same reef formation. Looking toward east with Point au Fer and intervening reef formations in the background.
- 11 No. 11, Page 3 Close-up of oysters and shells on eastern natural entrance point of Atchafalaya Bay. Note that some oysters are up-right or in active growth position. Camera lens case is in photograph to show size.
- 12 No. 14, Page 3 A part of the reef formation

off Point au Fer showing oysters in active growth position.

- 13 No. 33, Page 3 Looking northward from just above the western natural entrance point of Atchafalaya Bay. Formations in foreground and winding to right background are islands permanently above high water.
- 14 No. 31, Page 3 Shell Keys formation, looking northeastward.
- 15 No. 32, Page 3 Shell Keys again, but looking more nearly due north.
- 16 No. 34, Page 3 Ground photograph on a Shell Keys island. High-tide line is large ridge in right foreground. Note extent of island to left and rear of photograph.
- 17 No. 28, Page 4 Some of the reef formations associated with the Shell Keys.
- 18 No. 25, Page 4 Looking south past Mound Point on Marsh Island toward numerous reef formations leading out to the Shell Keys.
- 19 No. 30, Page 4 Looking east at reef formations that form a natural barrier blocking entrance into Atchafalaya Bay in this vicinity. Marsh Island is on the left.
- 20 No. 29, Page 4 Looking west along the shoreline of Marsh Island showing

reef formations extending toward the Shell Keys.

21 No. 26, Page 4 Looking south from Marsh Island down the reef formations and Shell Keys.

22 No. 24, Page 4 Looking south at the western headland Louisiana employs in Atchafalaya Bay. Because the Shell Keys are farther than twenty-four miles from the eastern natural entrance point, Louisiana moves the closing line in to this point. The line Louisiana describes is not quite twenty-four miles long because the shoreline of Marsh Island turns slightly northward just to the right of the point to which Louisiana closes.

Exhibit 192-A Index Map to Volume 5

Exhibit 193-A LPI 535 - U. S. Corps of Engineers
Photograph dated February 29, 1956
- P-55, 24-114

Exhibit 193-B LPI 538 - U. S. Corps of Engineers
Photograph dated October 29, 1957
- X-2, 550

Exhibit 193-C LPI 539 - U. S. Corps of Engineers
Photograph dated October 29, 1957
- X-2, 551

Exhibit 193-AB LPI 572 - U. S. Corps of Engineers
Photograph dated November 15, 1969
- 59-111

- Exhibit 193-AA** LPI 571 - U. S. Corps of Engineers
Photograph dated November 15, 1969
- 59-109
- Exhibit 193-Y** LPI 569 - U. S. Corps of Engineers
Photograph dated November 15, 1969
- 59-107
- Exhibit 193-X** LPI 568 - U. S. Corps of Engineers
Photograph dated November 15, 1969
- 59-105
- Exhibit 193-AN** LPI 584 - U. S. Corps of Engineers
Photograph dated November 20, 1969
- 60-4
- Exhibit 193-AM** LPI 583 - U. S. Corps of Engineers
Photograph dated November 20, 1969
- 60-3
- Exhibit 194
(Evidence)** LPI 1062 - This exhibit pertains to
the Atchafalaya Bay complex. It
shows natural entrance point and
measurement information.
- Exhibit 195** LPI 1163 - 24 pages of descriptive
notes by Dr. James P. Morgan per-
taining to various photographs
- Exhibit 196** LPI 917 - Gerdes Map (two pages)
- Exhibit 197** LPI 1056 - This display employs base
maps, at a reduced scale from the
Set of 54 maps, to reflect natural
entrance points analyses and mea-
surement data for various pro-
nounced land forms in East Bay
- Exhibit 198** This collection of illustrative display
materials shows Louisiana closing

line contentions, primary and alternative, for the Caillou Bay area. It also reflects measurement information

- Exhibit 199** LPI 1211 - Relevant portions of a map prepared by G. Etzel Percy using U.S.C. & G.S. Chart No. 1275 as a base map, at a reduced scale with notes thereon showing color information not reflected by the originals. This map was obtained by Louisiana by the Department of State through the United States Department of Justice.
- Exhibit 199-A** Same as Exhibit 199, showing colored lines
- Exhibit 200** LPI 1213 - Same description as Louisiana Preliminary Identifying No. 1211, except the base map is U. S. C. & G. S. Chart No. 1272
- Exhibit 200-A** Same as Exhibit 200, showing colored lines
- Exhibit 201** Map 2 of 8 of the Set of 54 maps
- Exhibit 202** LPI 1068 - U. S. C. & G. S. air photo compilation No. T 5295
- Exhibit 203** LPI 1067 - U.S.C. & G.S. air photo compilation No. T5291
- Exhibit 204** LPI 905 - U.S.C. & G.S. map H-6492
- Exhibit 205** LPI 906 - U.S.C. & G.S. map H-6172
- Exhibit 206** LPI 907 - U.S.C. & G.S. map No. 3630
- Exhibit 207** LPI 908 - U.S.C. & G.S. map No. 2752

Exhibit 208	LPI 909 - U.S.C. & G.S. map No. 1762
Exhibit 209	LPI 910 - U.S.C. & G.S. map No. 1763
Exhibit 210	LPI 911 - U.S.C. & G.S. map No. 4038
Exhibit 211	LPI 912 - U.S.C. & G.S. map No. 4044
Exhibit 212	LPI 913 - U.S.C. & G.S. map No. 4050
Exhibit 213	LPI 914 - U.S.C. & G.S. map No. T-5403
Exhibit 214	LPI 915 - U.S.C. & G.S. map T-5407
Exhibit 215	LPI 916 - U.S.C. & G.S. map 1691
Exhibit 216	LPI 904 - U.S.C. & G.S. map H-6513
Exhibit 217 A-E	U. S. Army Corps of Engineers maps, in 5 sheets, entitled "Passes of the Mississippi River, La." from photo-aerial surveys made in 1922 and 1929
Exhibit 218 A-F	La. Ex. 1-6; Photographs by Mr. David Morgan of Isle Derniere
Exhibit 219	Overheads from Mr. David Morgan's presentation; figure 1
Exhibit 220	Figure 49; Shalowitz
Exhibit 221	Figure 50; Shalowitz
Exhibit 222	Monterey Bay - Depth of penetration methods and data

- Exhibit 223** Monterey Bay - Depth of penetration methods - construction of median line for depth of penetration measurement in Monterey Bay
- Exhibit 224** Figure 3 of Mr. David Morgan's depth of penetration memo
- Exhibit 225** Figure 4 of Mr. David Morgan's depth of penetration memo
- Exhibit 226** Figure 5 of Mr. David Morgan's depth of penetration memo
- Exhibit 227** Mr. David Morgan's sketch of fjords
- Exhibit 228** Monterey Bay - Method B
- Exhibit 229** Mr. David Morgan's Bay Penetration data
- Exhibit 230** LPI 1182, a study prepared by Mr. David J. Morgan entitled, "Measurement of Penetration Ratio"
- Exhibit 231** Mr. David Morgan's Bucket Bend Bay work map
- Exhibit 232** Mr. David Morgan's Caillou Bay work map
- Exhibit 233** Mr. David Morgan's West Bay work map
- Exhibit 234** Mr. David Morgan's East Bay work map
- Exhibit 235** Mr. David Morgan's Norway fjord work map
- Exhibit 236-A** Chart 1276, 12th edition
- Exhibit 236-B** Chart 1277, 13th edition

Exhibit 237-A	Chart 1274, 10th edition
Exhibit 237-B	Chart 1272, 1970 edition
Exhibit 237-C	Chart 1273 of attachment, 5th edition
Exhibit 238	Talcott map, 1839
Exhibit 239	1918 chart 194
Exhibit 240	1901 chart 194
Exhibit 241	1873 chart 194
Exhibit 242	9th edition, chart 1272 with addenda
Exhibit 243	January 1933, chart 1272
Exhibit 244	April, 1944, chart 1272
Exhibit 245	October 1935, chart 1272
Exhibit 246	February, 1925, chart 1272
Exhibit 247	LPI 1231 - Gauld map sketch
Exhibit 248	Map 2 of 8
Exhibit 249-A	Mr. Philip L. Whitaker's field books (1 of 2)
Exhibit 249-B	Mr. Philip L. Whitaker's field books (2 of 2)
Exhibit 250-A	1198, prel. plat
Exhibit 250-B	1012, signed plat, showing mudlumps at South Pass
Exhibit 251	Geodimeter notes, 1198
Exhibit 252	1014-1023, copy of notes by Mr. Philip L. Whitaker on back of photos numbered 1014-1023
Exhibit 253	Tidal Bench Marks, South Pass

- Exhibit 254** LPI 1013, Letter from Harland R. Cravat, Chief, Technical Planning and Operations Branch, Photogrammetry Division, U. S. Department of Commerce, Environmental Science Services Administration, Coast and Geodetic Survey, to Frederick W. Ellis dated August 20, 1970 file #C141
- Exhibit 255** Methods of planimetering furnished Mr. Philip L. Whitaker by Mr. David Morgan
- Exhibit 256-A** LPI 63 - Copy of portions of a 1911 map of the State of Louisiana issued for the Railroad Commission of Louisiana as a supplement to its twelfth annual report
- Exhibit 256-B** LPI 64 - Copy of portions of a map entitled "New Commercial and Census Map of Louisiana" copyrighted in 1917
- Exhibit 256-C** LPI 65 - Copy of portions of a map entitled "Post Route map of the State of Louisiana", filed in the map Division of the Library of Congress June 18, 1903
- Exhibit 256-D** LPI 66 - Copy of a portion of a map of the State of Louisiana published by the Department of the Interior and compiled from the official records of the General Land Office and other sources under the direction of I. P. Berthong in 1916

- Exhibit 257** Joint 1962 agreement
- Exhibit 258** LPI 1165 - Map compiled under the direction of I. P. Berthong in 1916, from the official records of the General Land Office and other sources, showing the State of Louisiana, and being a published map from the records of the General Land Office of the Department of the Interior
- Exhibit 259** LPI 342 - Message of President Jefferson, 9th Congress, 2nd Session, No. 25, pp. 68-69 (December 2, 1806)
- Exhibit 260** LPI 343 - Message of President Jefferson, 8th Congress, 1st Session, No. 21 pp. 61-63 (October 17, 1803)
- Exhibit 261** LPI 344 - Report of the Secretary of State, Thomas Jefferson, 2nd Congress, 1st Session, No. 59 (March 7, 1792)
- Exhibit 262** LPI 346 - *Journals of the Continental Congress, 1774-1789*, edited from the original records in the Library of Congress by John C. Fitzpatrick, Vol. IIII, 1786, August 1 - December 31 U.S.G.P.O., Washington, 1934. Tuesday, August 29, 1786, pp. 574-596
- Exhibit 263** LPI 347 - *The Debates and Proceedings of the Congress of the United States* with an appendix containing important state papers and public documents and all the laws of a public nature. 7th Congress, 2nd Session,

from December 6, 1802, to March 3, 1803, Vol. 12, Washington: Gale & Seaton, 1851. James Madison, Secretary of State to Robert R. Livingston, May 1, 1802, pp. 1027-1028

Exhibit 264 LPI 349 - *The Debates and Proceedings of the Congress of the United States* with an appendix containing important state papers and public documents and all the laws of a public nature. 7th Congress, 2nd Session, from December 6, 1802, to March 3, 1803, Vol. 12, Washington: Gale & Seaton, 1851. Mississippi Question, February 23, 1803, pp. 151-154

Exhibit 265 LPI 350 - *The Debates and Proceedings of the Congress of the United States* with an appendix containing important state papers and public documents and all the laws of a public nature. 7th Congress, 2nd Session, from December 6, 1802, to March 3, 1803, Vol. 12, Washington: Gale & Seaton, 1851. Mississippi Question, February 1803, pp 231-234

Exhibit 266 LPI 356 - Executive Documents & Reports Committees, 27th Congress, 1st Session. Doc. #9, Ho. of Rep., March 6, 1841, Resolution, of the State of La., for a steamship of war to be built on the waters of the Mississippi

Exhibit 267 LPI 357 - Executive Documents &

- Reports Committees, 27th Congress, 1st Session. Doc #10, Ho. of Rep., June 12, 1840, Resolution of the Legislature of La. asking that the fortifications at the mouths of the Mississippi be completed and mounted.
- Exhibit 268** December, 1932 edition of chart 198
- Exhibit 269** October, 1925 edition of chart 1272
- Exhibit 270** 1937 edition of map of Louisiana - Official Map of Louisiana, first edition
- Exhibit 271** April, 1924 edition of chart 194
- Exhibit 272** March 1916 edition, which is a re-issue of June 1914 edition of chart 194
- Exhibit 273** June, 1914 edition of chart 194
- Exhibit 274** LPI 1169 - Hardee's Official Map of Louisiana dated 1895
- Exhibit 275** October, 1911 edition of chart 194
- Exhibit 276** Sketch of waves by F. W. Ellis
- Exhibit 277** Chart No. 1272, 23rd Ed., May 1969
- Exhibit 278** I.L.C. No. 8 lease, 1956
- Exhibit 279** Outer Continental Shelf "Hearings Before A Special Sub-Committee," December 17, 1969, Janaury 22, March 4, pp. 202-208
- Exhibit 280** Mr. Stevenson's Speech
- Exhibit 281** Dr. Alexander Melamid's published articles from the *Professional Geo-*

grapher, with letter to Mr. Jonathan Charney

Exhibit 282 Dr. Alexander Melamid's published articles from the *Oil Forum*, with letter to Mr. Strauss

Exhibit 283 General Documentary Materials, as follows:

LOUISIANA EXHIBIT NO. 283

GENERAL DOCUMENTARY MATERIALS

INDEX

Tab L.P.I.

No. No.

Description

- 1 1232 A letter from Robert D. Hodgson to Mr. Jonathan Charney, dated February 2, 1971, with enclosures consisting of letter from Robert D. Hodgson to Commander P. B. Beazley, dated March 31, 1970, and a letter from Commander P. B. Beazley to Dr. Robert D. Hodgson dated May 27, 1970.
- 2 1233 Part III of *The Law of Territorial Waters* from the Harvard Studies of International Law, Reporter, George Grafton Wilson.
- 3 1234 A letter from Mr. D. A. McDougal of the office of the Legal Adviser of the Department of State to Mr. Hackworth, dated June 26, 1934, enclosing a memorandum dated June 25, 1934 pertaining to the extent of control that a state may exercise over its territorial waters.

- 4 1235 A letter from R. S. Patton, Director of the United States Coast and Geodetic Survey, to Samuel W. Boggs of the State Department dated March 3, 1930, enclosing suggestions regarding the three-mile limit or parts thereof pertaining to bays and islands, together with copy of a letter dated March 22, 1930, to Captain Patton from S. W. Boggs, dateline at the Hague, The Netherlands.
- 5 1237 A letter to Mr. Hackworth from S. W. Boggs dated April 6, 1931, on the letterhead of the Department of State of the office of the Historical Adviser with enclosures pertaining to sundry charts which were the subject of the letter and which were published for the United States Tariff Commission.
- 6 1238 A letter to Mr. Miller from the Acting Secretary of the Department of State dated February 27, 1930.
- 6-A 1238 Enclosure with a draft proposal for the League of Nations Hague Conference dated March 17, 1930, showing proposals presented by the Norwegian and Swedish delegations.
- 7 1299 Copy of memorandum from the Solicitor of the Department of the Interior to the Secretary of the Interior dated October 1, 1954, from records of the Department of the Interior.
- 8 1300 A group of copies of documents from the records of the American delegation to the

Conference for the Codification of International Law held at the Hague in 1930 consisting of:

(a) A memorandum on the subject of territorial waters dated March 6, 1930 with annotations of the record copy to the effect that the memorandum was to be handed to the Secretary in London, but instead, Mr. Miller talked to the Secretary.

(b) Proposals presented by the Norwegian and Swedish Delegations to Committee II on Bases 3 and 4; 6, 7, and 8.

(c) Amendments proposed by the Delegation of the United States pertaining to Bases of discussion 1, 3, 4, 5, and 6.

(d) A memorandum by S. W. Boggs dated March 22, 1930, pertaining to an interview with a Captain Luymes.

(e) Proposals presented by the Norwegian and Swedish Delegations upon bases of discussions 3 and 4, 6, 7, and 8. (Note, this is apparently the same item described under (b) above except for annotations or marginalia appearing on (b).)

- 9 1301 A group of documents from records of the Department of State in the National Archives described as follows:

Copies of a group of documents from:

(a) A memorandum from the Legal Adviser of the Department of State to Mr. S. W. Boggs dated March 6, 1935 with the im-

print of the Office to the Geographer of the Department of State.

(b) A memorandum on stationery of the Department of State from "SWB," presumably, S. W. Boggs, to a Mr. Vallance, dated March 7, 1935.

(c) A memorandum dated March 11, 1935 initialed, "W.R.V." from the office of the Legal Adviser of the Department of State stamped with the receipt stamp of the office of the Geographer of the Department of State addressed to Mr. Boggs.

(d) A memorandum from the office of the Historical Adviser of the Department of State dated March 14, 1935 to Mr. Vallance with annotation or marginalia initialed "S.W.B."

(e) A draft with marginalia on the original of a letter to the Secretary of the Interior from the Secretary of State showing initials of "S.W.B." and others.

(f) Another draft of a letter proposed to be sent to the Secretary of the Interior by the Secretary of State bearing initials of "S.W.B." and other persons pertaining to a response to a letter of February 27, 1936. Similar in content to the next preceding letter except that the hand-written additions or annotations thereon (from the originals) differ, this copy having crossed out five lines on the first page, and the preceding draft (item (f) above) having proposed

certain additional language now apparently incorporated in this typed draft.)

(g) A copy of the letter dated March 22, 1935 which was forwarded to the Secretary of the Interior by the Assistant Secretary of State for the Secretary of State in response to The Secretary of the Interior's letter of February 27, 1935.

- 10 1302 A copy of the *North Atlantic Coast Fisheries Case* between Great Britain and the United States with related documents as reported in the *Hague Court Reports* on pages 142 through 225, inclusive. Handwritten marginalia on the first sheet of the copy are not from the original but are merely file number designations.
- 11 1303 Copy of the *Fisheries Case (United Kingdom v. Norway)* from the records of the International Court of Justice for the year 1951. (Note: the marginalia are from the hand of an unknown past reader of the report and are not submitted.)
- 13 1477 Bulletin Number Four, Coastal Studies Institute of Louisiana State University. See Technical Report 76: "Effects of Hurricane Camille on the Landscape of the Breton-Chandeleur Island Chain"
- 14 1482 Executive Order issued by Theodore Roosevelt concerning the declaration of bird preserves for certain islands including Breton Island, dated November 11, 1905.
- 15 1483 Executive Order issued by Theodore Roosevelt concerning the decalaration of bird pre-

serves for certain islands including Breton Island, dated October 4, 1904.

- 16 1516 A copy of the transcript of the hearing before the Committee on Foreign Relations, United States Senate, Eighty-Sixth Congress, Second Session concerning *Conventions of the Law of the Sea*.
- 17 1520 Decision, *Post Office vs. Estuary Radio, Ltd.* Opinion, *Regina vs. Kent Justices*.
- 18 1549 (a) Letter from President John Quincy a & b Adams to the House of Representatives of the United States dated Washington, 15th January, 1828.

(b) Letter from Henry Clay, Secretary of State, dated January 14, 1828, referred to by President Adams.
- 19 1008 Copy of letter from Gulf Oil Corporation Law Department (Melvin Evans) dated June 24, 1968, with documents referred to therein.
- 20 Documents relating to Louisiana's Motion of April, 1970 for publication of documents, together with Responses by the United States.
- 21 1538 This is a group of documents pertaining to methods of delimitation under the proposal at the Hague Conference in 1930 and other documents pertaining to Tariff Commission Studies all attached to a certification by one Jane F. Smith dated March 2, 1971

Exhibit 284 Deposition of Mr. Christopher Dobard.

Exhibit 284-A Exhibits to Deposition of Mr. Christopher Dobard.

Exhibit 285 LPI 1526, an exhibit showing straight baselines designated by the United States, its agencies or responsible officials, around parts of the Mississippi Delta area.

Exhibit 286 LPI 1525, an exhibit pertaining to the Caillou Bay region showing straight baselines designated by the United States, its agencies or responsible officials.

Exhibit 287-A-H 1:250,000 AMS Q 501 series maps of Bristol Bay area:

- A** 4-1 (Goodnews)
- B** 4-3 (Dillingham)
- C** 4-4 (Hagemeister Island)
- D** 4-5 (Nushagak)
- E** 4-6 (Naknek)
- F** 4-8 (Bristol Bay)
- G** 4-9 (Ugashik)
- H** 4-11 (Chignik)

Exhibit 288 LPI 1274, map labeled Bristol Bay, reference number 3, 4 series 1301, edition 1-AMS, scale 1:1,000,000.

Exhibit 289 LPI 1273, overlay of Delta por-

- tion of map labeled Mobile, reference number NH 16, series 1301, edition 1-AMS, scale 1:1,000,000.
- Exhibit 290** Johnston's Readyfold Coloured Touring Map.
- Exhibit 290-A** Film overlay of portion of this map.
- Exhibit 291** Sheet 12, map of England S.E. and London - Thames Estuary.
- Exhibit 292** Map - East Anglia.
- Exhibit 293** Larimore's work map, chart 1272, August 15, 1970 ed., showing planimetry areas within the Mississippi River, South Pass and Southwest Pass. Also markings by James P. Morgan.
- Exhibit 294** LPI 1273, map labeled Mobile, reference number NH 16, series 1301, ed. 1-AMS scale 1:1,000,000.
- Exhibit 295** LPI 1283, portion of delta area of map labeled Breton Sound, sheet numbered NH 16-7, 1:250,000.
- Exhibit 295-A** Overlay of above map, exhibit 295.
- Exhibit 296** East Bay planimetry information on 24th edition (December 6, 1969) and 25th edition (August 15, 1970) U. S. C. & G. S. nautical chart No. 1272.
- Exhibit 297** LPI 1521, an exhibit showing application of the Boggs Reduced Area formula to Monterey Bay and Atchafalaya Bay showing that the

formula was never recognized by law since these bays were adjudicated to be bays acquired by the states in the 19th century.

- Exhibit 298** LPI 1298, Enlargement of "Figure 6.—Semicircular rule applied to San Diego Bay, using reduced area method." from 1 *Shalowitz* 39 (1962).
- Exhibit 299** LPI 1517, East Bay Shoreline, January 24, 1970 from Coast and Geodetic Survey Color Photography Curtis Buttorff interpretation.
- Exhibit 300** LPI 1524, an exhibit showing interpretation of 1954 aerial photography by Mr. Curtis Buttorff, former United States closing lines and modified water gap information, all pertaining to additional low water line information in the vicinity of Isle Derniere.
- Exhibit 301** Overlay of the South Pass sheet. (Map 4 of 8 coverage at scale of 1:20,000 and on which Buttorff interpreted East Bay shore line.)
- Exhibit 302** LPI 1271, photograph, Ammann identifying No. 727-124, dated 1/7/54.
- Exhibit 303** LPI 1270, photograph, Ammann identifying No. 727-123, dated 1/7/54.
- Exhibit 304** LPI 1269, photograph, Ammann

identifying No. 727-122, dated 1/7/54.

Exhibit 305 LPI 1268, photograph, Ammann identifying No. 727-121, dated 1/7/54.

Exhibit 306 LPI 1267, photograph, Ammann identifying No. 727-120, dated 1/7/54.

Exhibit 307 LPI 1266, photograph Ammann identifying No. 727-119, dated 1/7/54.

Exhibit 308 LPI 1265, photograph, Ammann identifying No. 727-118, dated 1/7/54.

Exhibit 309 LPI 1264, photograph, Ammann identifying No. 727-38, dated 1/7/54.

Exhibit 310 LPI 1263, photograph, Ammann identifying No. 726-96, dated 1/8/54.

Exhibit 311 LPI 1293, photograph, Ammann identifying No. 727-197, dated 1/8/54.

Exhibit 312 LPI 1292, photograph, Ammann identifying No. 727-177, dated 1/8/54.

Exhibit 313 LPI 1291, photograph, Ammann identifying No. 727-176, dated 1/8/54.

Exhibit 314 LPI 1290, photograph, Ammann

identifying No. 727-175, dated 1/8/54.

Exhibit 315 LPI 1289, photograph, Ammann identifying No. 727-144, dated 1/7/54.

Exhibit 316 LPI 1288, photograph, Ammann identifying No. 727-135, dated 1/7/54.

Exhibit 317 LPI 1287, photograph, Ammann identifying No. 727-134, dated 1/7/54.

Exhibit 318 LPI 1286, photograph, Ammann identifying No. 727-133, dated 1/7/54.

Exhibit 319 LPI 1285, photograph, Ammann identifying No. 727-126, dated 1/7/54.

Exhibit 320 LPI 1284, photograph, Ammann identifying No. 727-125, dated 1/7/54.

Exhibit 321 LPI 1304, photo mosaic obtained from Ammann International Corp. compiled from photos of Jack Ammann Photogrammetric Engineers, Inc. based upon 1954 aerial photography employed in preparation of the Set of 54 maps, sheet L 39.

Exhibit 322 LPI 1305, photo mosaic obtained from Ammann International Corp, compiled from photos of Jack Ammann Photogrammetric Engineers, Inc., based upon 1954 aerial photo-

graph employed in preparation of the Set of 54 maps, sheet L 40.

- Exhibit 323** Natural Entrance point alternative at South Pass at various tide stages. Location 1, overlay, made by Curtis Buttorff at National Ocean Survey.
- Exhibit 324** George H. Lauff, ed., *Estuaries*, American Association for the Advancement of Science, No. 83 (1967).
- Exhibit 325** LPI 1478, map of Yarmouth-Windsor area of Nova Scotia, published by Canadian government showing bay of Fundy and St. Mary's Bay area; LPI 1479, map labeled Church Point, N. S., 21 B/8 West half, first edition;
LPI 1480, map labeled Church Point, N. S., 21 B/8 East Half, first edition;
LPI 1481, map labeled Digby, N. S., 21 A/12 West Half, second edition, all dealing with St. Mary's Bay.
- Exhibit 326** 1886 Chart of Breton Island Sound
- Exhibit 327-A** Map 20 of 41, Buttorff work sheet of Isle Derniere, analyzing Ammann photos.
- Exhibit 327-B** Map 19 of 41, Buttorff work sheet of Isle Derniere, analyzing Ammann photos.

- Exhibit 328** LPI 1463, David Morgan's index to photos taken along South Pass and showing artificial maintenance of openings by Corps of Engineers (sheet 4 of 8).
- Exhibit 329** Photograph Album Vol. 3 of Dr. James P. Morgan, concerning artificial maintenance of openings between South Pass and East Bay (for rebuttal).

LIST OF PHOTOGRAPHS TO ACCOMPANY
REBUTTAL TESTIMONY OF JAMES P.
MORGAN CONCERNING ARTIFICIAL
MAINTENANCE OF OPENINGS BE-
TWEEN SOUTH PASS, MISSIS-
SIPPI RIVER, AND EAST BAY

(The following photographs illustrate artificially maintained openings from South Pass of the Mississippi River into East Bay. The photographs depict openings on the west bank of South Pass consecutively from south to north. Figure 1, pages 1 through 5 (LPI #1463) accompanying the photographs, indicates the position of each photographed opening. All photographs were taken by David J. Morgan unless otherwise indicated.)

*Chrono- Louisi-
logic ana Pre-
Num- liminary*

*ber of Identify- Date of
Photo- ing Photo-
graph Number graphy*

*Description of
Photographs*

1	1420	February 23, 1971	View west of opening shown on Fig. 1, page 1.
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2	1414	February 23, 1971	View west of opening shown on Fig. 1, page 1.
3	1406	February 23, 1971	View west of opening shown on Fig. 1, page 1.
4	1405	February 23, 1971	View west of opening shown on Fig. 1, page 1.
5	1425	February 23, 1971	View west of U.S. Coast Guard Light Station. (Fig. 1, pages 1 and 2)
6	1418	February 23, 1971	View west of opening shown on Fig. 1, page 2.
7	1417	February 23, 1971	View west of opening shown on Fig. 1, page 2.
8	1416	February 23, 1971	View west of opening shown on Fig. 1, page 2.
9	1396	February 23, 1971	View west of opening shown on Fig. 1, page 2.
10	1415	February 23, 1971	View west of opening shown on Fig. 1, page 2.
11	1397	February 23, 1971	View west of opening shown on Fig. 1, pages 2 and 3.
12	1365	February 23, 1971	View west of opening shown on Fig. 1, pages 2 and 3.
13	1419	February 23, 1971	View west of opening shown on Fig. 1, pages 2 and 3.
14	1404	February 23, 1971	View west of opening shown on Fig. 1, pages 2 and 3.
15	1362	February 23, 1971	View west of opening shown on Fig. 1, pages 2 and 3.

Photograph by James P. Morgan

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|----|------|-------------------|---|
| 16 | 1361 | February 23, 1971 | View west of opening shown on Fig. 1, pages 2 and 3. Photograph by James P. Morgan |
| 17 | 1351 | February 23, 1971 | View west of opening shown on Fig. 1, pages 2 and 3. |
| 18 | 1350 | February 23, 1971 | View west of Oysterville Light and opening to west shown on Fig. 1, page 3. Photograph by James P. Morgan |
| 19 | 1375 | February 23, 1971 | View west of opening immediately north of Oysterville Light shown on Fig. 1 page 3. |
| 20 | 1360 | February 23, 1971 | View west of opening shown on Fig. 1, page 3. |
| 21 | 1376 | February 23, 1971 | View west of opening shown on Fig. 1, page 3. |
| 22 | 1359 | February 23, 1971 | View west of opening shown on Fig. 1, page 3. Photograph by James P. Morgan |
| 23 | 1366 | February 23, 1971 | View northwest of opening shown on Fig. 1, pages 3 and 4. Photograph by James P. Morgan |
| 24 | 1403 | February 23, 1971 | View northwest of opening shown on Fig. 1, pages 3 and 4. |

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|--------------------|------|-------------------|---|
| 25 | 1422 | February 23, 1971 | View west of opening shown on Fig. 1, pages 4 and 5. |
| 26 | 1421 | February 23, 1971 | View northwest of opening shown on Fig. 1, pages 4 and 5. |
| 27 | 1423 | February 23, 1971 | Detail of rip-rap at opening shown on Fig. 1, pages 4 and 5. |
| 28 | 1373 | February 23, 1971 | View west of rip-rap controlled opening shown on Fig. 1, pages 4 and 5. |
| 29 | 1372 | February 23, 1971 | View west of rip-rap controlled opening shown on Fig. 1, pages 4 and 5. |
| 30 | 1371 | February 23, 1971 | View west of rip-rap controlled opening shown on Fig. 1, pages 4 and 5. |
| 31 | 1401 | February 23, 1971 | View west of rip-rap blocking opening shown on Fig. 1, page 5. |
| 32 | 1402 | February 23, 1971 | View west of rip-rap controlled opening shown on Fig. 1, page 5. |
| Exhibit 330 | | | Photograph album of Mr. David J. Morgan of Isle Derniere area. |

DESCRIPTION OF PHOTOGRAPHS AND
RELATED LOCATION MAPS CONCERNING
THE ISLE DERNIERE AREA

(All photographs taken by David J. Morgan unless
otherwise annotated)

<i>Chrono- logic Num- ber of Illustra- tion</i>	<i>Louisi- ana Pre- liminary Identify- ing Number</i>	<i>Date of Photo- graph or Publication</i>	<i>Description of Photograph or Illustration</i>
1			Index map of Isle Derniere area showing location of Figures 1-5.
2			Figure 1 - portion of Cocodrie Quadrangle, 7.5 minute series showing approximate locations of photographs taken in that vicinity.
3	1256	September 5, 1970	View NNW of marsh vegetation in vicinity of Pass La Poule in Lake Pelto.
4	1261	September 5, 1970	View NE of marsh vegetation in vicinity of Pass La Poule in Lake Pelto.
5	1532		Figure 2 - Portion of sheet 18 of 41 of the Set of 54 Maps showing approximate locations of photographs taken in that vicinity.
6	1239	September 5, 1970	Wave action in Lake Pelto - view northward.

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|----|------|-------------------|--|
| 7 | 1245 | September 5, 1970 | Wave action in Lake Pelto - view northward. |
| 8 | 1242 | September 5, 1970 | Remnant of Bobwin Point, former distributary in Lake Pelto. View N. |
| 9 | 1262 | September 5, 1970 | View southward down west side of pinnacle of land extending northward to the west of Old Camp Pass. |
| 10 | 1243 | September 5, 1970 | Pinnacle of land extending northward west of Old Camp Pass, looking NE. |
| 11 | 1260 | September 5, 1970 | Detail of organic clay composing land in rear of island; exhumed vegetation in background. |
| 12 | 1259 | September 5, 1970 | View facing south down pinnacle of land at rear of island to the west of Old Camp Pass. |
| 13 | 1232 | | Figure 3 - portion of sheet 19 of 41 of the Set of 54 Maps showing the approximate position of photographs taken in that vicinity. |
| 14 | 1252 | September 5, 1970 | View looking south at vegetation characteristics at rear of island. |
| 15 | 1248 | September 5, 1970 | View looking south at boat traffic in Caillou Bay. Isle Derniere in background. |

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|----|------|----------------------|---|
| 16 | 1544 | March
13, 1971 | View looking west at peninsula in Bay Round vicinity, north of Isle Derniere. (James P. Morgan) |
| 17 | 1545 | March
13, 1971 | Vegetation characteristics on peninsula in Bay Round vicinity. (James P. Morgan) |
| 18 | 1546 | March
13, 1971 | Vegetation characteristics on peninsula in Bay Round vicinity. (James P. Morgan) |
| 19 | 1547 | March
13, 1971 | Vegetation characteristics on peninsula in Bay Round vicinity. (James P. Morgan) |
| 20 | 1532 | | Figure 4 - portion of sheet 19 of 41 of the Set of 54 Maps showing the approximate positions of photographs taken in that vicinity. |
| 21 | 1244 | September
5, 1970 | View of north shore of Cailou Bay showing vegetation characteristics. View eastward. |
| 22 | 1532 | | Figure 5 - portion of sheet 20 of 41 of the Set of 54 Maps showing the approximate position of photographs taken in that vicinity. |
| 23 | 1251 | September
5, 1970 | View looking north at exhumed island vegetation mud flat to the west of Coupe Colin. |

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|----|------|----------------------|--|
| 24 | 1249 | September
5, 1970 | View NE across Coupe Colin
at fishing camp on second
island. |
| 25 | 1253 | September
5, 1970 | View NE across Coupe Colin
at fishing camp on second
island. |
| 26 | 1247 | September
5, 1970 | View looking ESE at back
of westernmost island of Isle
Derniere. |
| 27 | 1250 | September
5, 1970 | View southward of western-
most island of Isle Derniere
showing mangrove and other
vegetation. (With D. J. Mor-
gan) |
| 28 | 1246 | September
5, 1970 | View southward of western-
most island of Isle Derniere
showing mangrove and other
vegetation. (With F. W.
Ellis) |
| 29 | 1255 | September
5, 1970 | View SW down rear of west-
ernmost island of Isle Dern-
iere. |
| 30 | 1258 | September
5, 1970 | Bateau on beach at rear of
westernmost island ap-
proaching Raccoon Point.
Exhumed marsh in fore-
ground. View looking east. |
| 31 | 1240 | September
5, 1970 | View looking east down
westernmost island showing
general characteristics of
the island. Gulf of Mexico is
to the extreme right. |

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|----|------|-------------------|--|
| 32 | 1254 | September 5, 1970 | View looking northward showing vegetation characteristics-Caillou Bay in background. |
| 33 | 1255 | September 5, 1970 | View looking west down westernmost island showing vegetation and general characteristics. Caillou Bay to right and Gulf to left. |
| 34 | 1241 | September 5, 1970 | View looking west down beach of westernmost island of Isle Derniere. Gulf of Mexico to left. |

Exhibit 331 LPI 1548, hand-written summary report of David Morgan concerning comparison of the shapes and areas of water gap and island configurations in the Isle Derniere area plus annexed Xerox copies of map information.

Exhibit 332
A and B

LPI 1484, record of the United States Coast and Geodetic Survey of the Department of Commerce showing hourly heights of tides at Eugene Island, Louisiana, dated February 5, 1954 for the period January 1 through January 14, referenced to a datum of 1.6 feet below mean low water.

Exhibit 333-A LPI 1294, statement by E. T. Oliver, Jr., dated February 18, 1971, concerning the records of Ammann In-

ternational Corporation and predecessor firms being in his custody.

- Exhibit 333-B** LPI 1295, film record card of Jack Ammann Photogrammetric Engineers, numbered 726, referred to in LPI No. 1294.
- Exhibit 333-C** LPI 1296, film record card of Jack Ammann Photogrammetric Engineers, numbered 727, referred to in LPI No. 1294.
- Exhibit 333-D** LPI 1297, statement from E. T. Oliver, Jr. of information obtained from original file record cards, statement dated February 18, 1971, and originally attached to LPI No. 1294.
- Exhibit 334** LPI 1485, a document entitled, "Summary of Tide Information pertaining to 1954 Ammann Photography in the Isle Derniere Area."
- Exhibit 334-A** Drawing by David Morgan regarding tide information derived from the Eugene Island gauge.
- Exhibit 335** LPI 1518, a sketch prepared to graphically reflect wind direction information presented in testimony of Mr. Arthur I. Cooperman.
- Exhibit 336** Mylar overlay of 24th edition of chart 1272, December 1969, delimiting areas for planimetry.
- Exhibit 337** Mylar overlay of 25th edition of chart 1272, August, 1970, delimiting areas for planimetry.

- Exhibit 338** Sketch by David Morgan illustrating scale problems on maps.
- Exhibit 339** Work sheets showing data for 45-degree test in the Caillou Bay area (in comparison with United States Exhibit 355).
- Exhibit 340** Photograph Album Vol. 1 of Dr. James P. Morgan, concerning mudlumps, South Pass sand spit, and Bucket Bend Bay area.

LIST OF PHOTOGRAPHS TO ACCOMPANY
THE REBUTTAL TESTIMONY OF JAMES
P. MORGAN CONCERNING PHYSICAL
CHARACTERISTICS OF MISSISSIPPI DELTA
MUDLUMPS, SOUTH PASS SAND SPIT AND
BUCKET BEND BAY AREA

(All of the Photographs included here were taken by James P. Morgan unless otherwise indicated.)

PART I—COLOR PHOTOGRAPHS

<i>Chrono- logic Num- ber of Photo- graph</i>	<i>Louisi- ana Pre- liminary Identify- ing Number</i>	<i>Date of Photo- graphy</i>	<i>Description of Photographs</i>
1	1434	February 21, 1971	River silt and "mainland" vegetation on mudlump at Southeast Pass. View northwest.
2	1452	February 21, 1971	Buck brush and isolated clumps of Roseau on South-

east Pass mudlump. View north.

- 3 1429 February Vegetation including Roseau
 21, 1971 on west (bayside) of South-
 east Pass mudlump. View
 north.
- 4 1450 February Rangia clams (indicative of
 21, 1971 marshland lakes) on South-
 east Pass mudlump.
- 5 1445 February Feces of coypu (nutria) in
 21, 1971 Bermuda grass on Southeast
 Pass mudlump.
- 6 1345 February Very shallow water between
 21, 1971 Southeast Pass mudlumps
 indicated by significant
 waves generated over short
 fetch between islands. View
 north.
- 7 1369 February Flock of terns disturbed on
 22, 1971 Pass a Loutre mudlumps.
 View north.
- 8 1367 February Mudlumps off mouth of Pass
 22, 1971 a Loutre. View west.
- 9 1379 February Mudlump islands off mouth
 22, 1971 of South Pass. View north-
 east. Photo by David J. Mor-
 gan.
- 10 1380 February Mudlump islands off mouth
 22, 1971 of South Pass. View north-
 east. Photo by David J. Mor-
 gan.

- 11 1378 February Mudlump islands off mouth
 22, 1971 of South Pass. View north
 Photo by David J. Morgan.
- 12 1377 February Dr. Morgan collecting fos-
 22, 1971 sils from South Pass mud-
 lump 89-90; being watched
 by Mr. Ellis. Photo by David
 J. Morgan.
- 13 1431 February Fire ant mount on South
 22, 1971 Pass mudlump 89-90. Photo
 by David J. Morgan.
- 14 1441 February Feces of coypu (nutria) on
 23, 1971 mud-cracked surface of
 South Pass mudlump 93.
- 15 1432 February Feces of coypu (nutria)
 23, 1971 around mud puddle on mud-
 lump 89-90. Photo taken by
 David J. Morgan.
- 16 1476 February Telephoto view of South
 23, 1971 Pass Coast Guard Station
 and sand spit. View north-
 east. (No. 1 of a 7-photo
 panorama.)
- 17 1473 February Telephoto view of South
 23, 1971 Pass Coast Guard Station
 and sand spit. View north.
 (No. 2 of a 7-photo pano-
 rama.)
- 18 1470 February Telephoto view of South
 23, 1971 Pass Coast Guard Station
 and sand spit. View north.
 (No. 3 of a 7-photo pano-
 rama.)

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|----|------|-------------------|--|
| 19 | 1474 | February 23, 1971 | Telephoto view of South Pass Coast Guard Station and sand spit. View north. (No. 4 of a 7-photo panorama.) |
| 20 | 1471 | February 23, 1971 | Telephoto view of South Pass Coast Guard Station and sand spit. View north. (No. 5 of a 7-photo panorama.) |
| 21 | 1472 | February 23, 1971 | Telephoto view of South Pass Coast Guard Station and sand spit. View northwest (No. 6 of a 7-photo panorama.) |
| 22 | 1475 | February 23, 1971 | Telephoto view of South Pass Coast Guard Station and sand spit. View northwest. (No. 7 of 7-photo panorama.) |
| 23 | 1512 | March 6, 1971 | Mouth of South Pass showing sand spit which has reformed since Hurricane Camille and mudlumps in distance. View southwest. |
| 24 | 1510 | March 6, 1971 | Mouth of South Pass showing sand spit which has reformed since Hurricane Camille. Mudlumps in distance. View north. |
| 25 | 1509 | March 6, 1971 | Mouth of South Pass showing sand spit which has reformed since Hurricane Ca- |

mille. Mudlumps in distance.
View east.

- | | | | |
|----|------|-------------------|---|
| 26 | 1437 | February 23, 1971 | Vegetation surrounding pond on South Pass mudlump 93. View southwest. |
| 27 | 1382 | February 23, 1971 | Mud vent discharging brine into pond on South Pass mudlump 93. View southeast. |
| 28 | 1438 | February 23, 1971 | Vegetation surrounding pond on South Pass mudlump 93. View northwest. |
| 29 | 1496 | March 6, 1971 | View west toward the interior of Cubits Crevasse area north of Bucket Bend Bay. |
| 30 | 1495 | March 6, 1971 | View west toward the interior of Cubits Crevasse area north of Bucket Bend Bay. Area immediately south of Photo No. 29. |
| 31 | 1497 | March 6, 1971 | View toward southwest of Bucket Bend Bay. |
| 32 | 1493 | March 6, 1971 | View toward southwest of Bucket Bend Bay. |
| 33 | 1491 | March 6, 1971 | View toward southwest of Bucket Bend Bay. Pass a Loutre in the background. |
| 34 | 1499 | March 6, 1971 | View west of Bull Bay (inner part of Bucket Bend Bay) and Paddy Bay. Pass a Loutre to left of photo. |

35	1487	March 6, 1971	View north of Paddy Bay at upper end of Bucket Bend Bay. Pass a Loutre in left foreground.
36	1486	March 6, 1971	View to the northeast of Bucket Bend Bay and opening into Gulf.
37	1515	March 6, 1971	Marsh area south of Bucket Bend Bay. Mud flats reflect tide stage.
38	1514	March 6, 1971	Marsh area south of Bucket Bend Bay. Mud flats reflect tide stage.

PART II—BLACK AND WHITE PHOTOGRAPHS

<i>Chrono- logic Number of Photo- graph</i>	<i>Louisi- ana Pre- liminary Identify- ing Number</i>	<i>Date of Photo- graphy</i>	<i>Description of Photographs</i>
B & W 1	1307	March 6, 1971	Aerial view to northeast of Paddy Bay (foreground), Bull Bay (middle ground), and Gulf in Bucket Bend Bay area.
B & W 2	1465	March 6, 1971	Aerial view to the southwest showing Bucket Bend Bay area with Pass a Loutre in distance.
B & W 3	1468	March 6, 1971	Aerial view to the southwest showing Bucket Bend Bay area with Pass a Loutre in distance.

B & W 4 1469 March View to the southwest
6, 1971 showing ship entering
South Pass with sand spit
and mudlump islands in
distance.

Exhibit 341 Photograph album, Vol. 2 by Dr. James
P. Morgan, concerning Joseph Bayou
area.

LIST OF PHOTOGRAPHS TO ACCOMPANY THE
REBUTTAL TESTIMONY OF JAMES P. MOR-
GAN CONCERNING THE PHYSICAL CHAR-
ACTERISTICS OF THE JOSEPH BAYOU
AREA, EAST BAY MISSISSIPPI DELTA

(All of the photographs included here were taken by
James P. Morgan unless otherwise indicated.)

PART 1 - COLOR PHOTOGRAPHS

Figure 1 - Index Map showing photograph directions
and locations by LPI Number.

*Chrono- Louisi-
logic ana Pre-
Num- liminary
ber of Identify-
Photo- ing
graph Number*

*Date of
Photo-
graphy*

*Description of
Photographs*

- | | | | |
|---|------|-------------------|--|
| 1 | 1357 | February 22, 1971 | View north from Joseph Bayou showing levees in foreground and dredged spoil in distance. |
| 2 | 1346 | February 22, 1971 | View northeast from Joseph Bayou showing levees in |

foreground and dredged
spoil in distance.

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|----|------|----------------------|---|
| 3 | 1347 | February
22, 1971 | View east from Joseph Bay-
ou across levee. |
| 4 | 1355 | February
22, 1971 | View east across Joseph
Bayou levee. |
| 5 | 1356 | February
22, 1971 | View southeast down Joseph
Bayou and left bank na-
tural levee. |
| 6 | 1353 | February
22, 1971 | View northeast across Jo-
seph Bayou natural levee
(middle ground) showing
Roseau clumps in distance. |
| 7 | 1354 | February
22, 1971 | View north from canal in
Joseph Bayou area. See at-
tached map (Fig. 1) for lo-
cation. |
| 8 | 1408 | February
22, 1971 | Well location in Joseph Bay-
ou canal. See Fig. 1 for lo-
cation. |
| 9 | 1407 | February
22, 1971 | Well location in Joseph Bay-
ou canal. See Fig. 1 for loca-
tion. |
| 10 | 1411 | February
22, 1971 | View northwest from Joseph
Bayou canal showing crew
boat in another canal in dis-
tance. See Fig. 1 for loca-
tion. |
| 11 | 1410 | February
22, 1971 | Deteriorating marshland in
Joseph Bayou area. View |

- north. See Fig. 1 for location.
- | | | | |
|----|------|-------------------|---|
| 12 | 1409 | February 22, 1971 | View northwest across deteriorating marshland in Joseph Bayou area. See Figure 1 for location. |
| 13 | 1400 | February 22, 1971 | View southeast out mouth of Joseph Bayou into East Bay. See Fig. 1 for location. |
| 14 | 1413 | February 22, 1971 | View northwest of Roseau marshland of Joseph Bayou area. See Fig. 1 for location. |
| 15 | 1394 | February 22, 1971 | View north of Roseau marshland near mouth of Joseph Bayou. See Fig. 1 for location. |
| 16 | 1398 | February 22, 1971 | View north of Roseau marshland near mouth of Joseph Bayou. See Fig. 1 for location. |
| 17 | 1457 | February 22, 1971 | Mr. Ellis standing in Roseau clump at mouth of Joseph Bayou. See Fig. 1 for location. Photo by David J. Morgan. |
| 18 | 1459 | February 22, 1971 | Mr. Ellis standing in Roseau clump at mouth of Joseph Bayou. See Fig. 1 for location. Photo by David J. Morgan. |
| 19 | 1458 | February 22, 1971 | Mr. Ellis standing in Roseau clump at mouth of Joseph |

Bayou. See Fig. 1 for location. Photo by David J. Morgan.

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|----|------|----------------------|--|
| 20 | 1456 | February
22, 1971 | Mr. Ellis showing result of standing in Roseau clump at mouth of Joseph Bayou. Photo by David J. Morgan. |
| 21 | 1381 | February
22, 1971 | Mr. Ellis showing result of standing in Roseau clump at mouth of Joseph Bayou. Photo by David J. Morgan. |
| 22 | 1539 | March
6, 1971 | Aerial view toward southwest of the Joseph Bayou area. Southwest Pass in background. |
| 23 | 1540 | March
6, 1971 | Aerial view toward southwest of the Joseph Bayou area. Southwest Pass in background. |
| 24 | 1541 | March
6, 1971 | Aerial view toward southwest of the Joseph Bayou area. Southwest Pass in background. |
| 25 | 1542 | March
6, 1971 | Aerial view toward southwest of the Joseph Bayou area. Southwest Pass in background. |
| 26 | 1543 | March
6, 1971 | Aerial view toward southwest of the Joseph Bayou area. Southwest Pass in background. |

PART II - BLACK AND WHITE PHOTOGRAPHS

<i>Chrono- logic Num- ber of Photo- graph</i>	<i>Louisi- ana Pre- liminary Identify- ing Number</i>	<i>Date of Photo- graphy</i>	<i>Description of Photograph</i>
B & W 1	1326	February 22, 1971	Part of a 3-photo panorama (LPI #1523A) showing Joseph Bayou area; same region as shown on Fig. 1.
B & W 2	1327	February 22, 1971	Part of a 3-photo panorama (LPI #1523A) showing Joseph Bayou area; same region as shown on Fig. 1.
B & W 3	1328	February 22, 1971	Part of a 3-photo panorama (LPI #1523A) showing Joseph Bayou area; same region as shown on Fig. 1.
B & W 4	1329	February 22, 1971	Detail of Roseau marshland at the mouth of Joseph Bayou. View east (same location as LPI #1381, Fig. 1)
B & W 5	1340	February 22, 1971	Mr. Ellis standing in Roseau at the mouth of Joseph Bayou. View east (same location as LPI #1381, Fig. 1).

- Exhibit 342** LPI 1523-B, panorama of Dr. Morgan's photos of tombolo at South Pass.
- Exhibit 343** LPI 1523-A, black and white panorama of Joseph Bayou area.
- Exhibit 344** LPI 1522, an exhibit reflecting hydrographic information pertaining to the Pass a Loutre area. (colored)
- Exhibit 345** Mylar film of map 2 of 8, North Pass, Pass a Loutre, to overlay exhibit 344.
- Exhibit 346** Mylar film of map of Southeast Pass mudlumps, map 3 of 8, at reduced scale (approximately 1:30,000) to overlay Louisiana Exhibit 216.
- Exhibit 347** Mylar film of mouth of South Pass from map 4 of 8 at reduced scale (approximately 1:30,000) to overlay Louisiana Exhibit 216.
- Exhibit 348** Memo of area in acres of Mississippi River below Venice by Larimore.
- Exhibit 349** *Water Borne Commerce of the United States*, Corps of Engineers, pp. 179-80 (1967)
- Exhibit 350** *Water Borne Commerce of the United States*, Corps of Engineers, pp. 181-82 (1968)
- Exhibit 351** *Water Borne Commerce of the United States*, Corps of Engineers, pp. 189-90 (1969)
- Exhibit 352** Brief Exhibit 70-118, appendix G. of Louisiana Brief before the Supreme

Court. Harbor works to show channel depths (Corps of Engineers).

Exhibit 353 Three-mile projection plotted on reduced scale Set of 54 Maps (w/documents from Louisiana Answers to Second Interrogatories affixed to front cover).

Exhibit 353-A Computer printout of three-mile projection (done by Louisiana State University) (w/one-page attachments).

Exhibit 354 Norwegian maps
B-G

Exhibit 355 The *In Camera* documents; Confidential documents; no copy allowed.

Exhibit 356 (a) Letter from Solicitor General Perlman to Boliver E. Kemp, Jr., Attorney General for the State of Louisiana, dated March 16, 1951. This letter has been introduced in evidence as U. S. Exhibit No. 341.

(b) The copies of the United States Coast and Geodetic Survey Charts Nos. 1115 and 116 upon which was delineated the line showing the general location of the landward boundary of the offshore area claimed by the United States, which were attached to the letter by Mr. Philip B. Perlman, Solicitor General, to the Honorable Boliver E. Kemp, Jr., dated March 16, 1951.

(c) Letter from Solicitor General Perlman to Boliver E. Kemp, Jr., At-

torney General of the State of Louisiana, dated June 12, 1951

(d) Letter from Solicitor General Perlman to Boliver E. Kemp, Jr., Attorney General of the State of Louisiana, dated June 26, 1951.

(e) Letter from Secretary of State Seward to Gabriel Tassara, Spanish Minister, dated August 10, 1863, which appears in 1 Moore *Digest of International Law*, 1906, p. 711.

(f) Hall *International Law* 8th Edition, 1917, pages 126, 127.

(g) Senate Document No. 162, 58th Congress, 2d Session, pages 239-240; page 221, pages 224 to 228 and pages 15 and 16, and Volume 4, Part I, Counter Case of the United States, pages 131-132; Volume 5, Part I, Argument of the United States, pages 14-18; Volume 7, pages 605-611, pages 543-548.

APPENDIX II, Part 3

INDEX TO THE EVIDENCE INTRODUCED BY
THE UNITED STATES IN THE PROCEEDING
BEFORE WALTER P. ARMSTRONG, JR., SPEC-
CIAL MASTER

- Exhibit 1** Descriptive Report, Planimetric and Mean-Low Water Line Mapping Projects PH-5903 and 20,000-819 Part I - Mississippi River Delta, T-10944 to T-10957
- Exhibit 2** Compilation Report, Mississippi Delta, Louisiana Map Numbers T-10944 through 10957, Bureau of Land Management Numbers 1 through 8
- Exhibit 3** Reprint from the International Hydrographic Review, Vol. XXXVIII, No. 1, January 1961, Mapping the Low-Water Line of the Mississippi Delta
- Exhibit 4** Descriptive Report, Shoreline and Mean-Low Water Line Mapping - Project 20,000-819 Part II—T11993-T-11997, Atchafalaya Bay
- Exhibit 5** Hand held photographs taken during 1960-1961 Atchafalaya Bay Survey and Descriptive Area Maps
- Exhibit 6** Aerial Photographs Nos. :
L8606 - L8612, L9036, L9035,
L9034, L9033, L9032, L9031,
L9030, L9029, L8703, L8704,
L9003, L9002, L9001

- Field Inspection Photographs Nos.:
L8606 - L8609, L8703
- Exhibit 7** Aerial Photographs Nos.:
L8720 - L8729, L8984 - L8989,
08713, L8991
Field Inspection Photographs Nos.:
L8991, L8983, L8985, L8987,
L8989, L8727
- Exhibit 8** Letter from Wesley A. D'Ewart, Assistant Secretary of the Interior, to William G. Helis, Chairman, Louisiana State Mineral Board, July 11, 1956
- Exhibit 9** Letter from William G. Helis, Chairman, Louisiana State Mineral Board, to Wesley A. D'Ewart, Assistant Secretary of the Interior, July 23, 1956
- Exhibit 10** Memorandum for the Record, by Earl G. Harrington, Cadastral Engineering Staff Officer, and Donald B. Clement, Cadastral Engineering Officer, for the Interior Department Committee, August 27, 1956
- Exhibit 11** Letter from Earl G. Harrington, Chairman, Interior Committee, to Gordon I. Atwater, August 30, 1956
- Exhibit 12** Letter from Gordon Atwater to William G. Helis, Jr., Chairman, Louisiana State Mineral Board, September 19, 1956
- Exhibit 13** Letter from Gordon Atwater to Earl

- G. Harrington, Cadastral Engineering Staff Officer, Bureau of Land Management, September 4, 1956
- Exhibit 14** Letter from Earl G. Harrington, Cadastral Engineering Staff Officer, Bureau of Land Management, to Gordon Atwater, September 25, 1956
- Exhibit 15** Letter from Gordon Atwater to William G. Helis, Jr., Chairman, Louisiana State Mineral Board, January 10, 1957
- Exhibit 16** Letter from Gordon Atwater to Donald B. Clement, Acting Cadastral Engineering Staff Officer, Bureau of Land Management, June 12, 1957
- Exhibit 17** Letter from Gordon Atwater to Al Glodt, Chairman, Offshore Operators Committee, August 9, 1957
- Exhibit 18** Letter from Gordon Atwater to T. H. Montgomery, May 28, 1958
- Exhibit 19** Letter from Gordon Atwater to Rear Admiral H. Arnold Karo, Director, Coast and Geodetic Survey, June 5, 1958
- Exhibit 20** Letter from Gordon Atwater to William Helis, Jr., Committee Chairman, Louisiana State Mineral Board, July 16, 1958
- Exhibit 21** Letter from Gordon Atwater and H. M. Hayne, for the State of Louisiana, and Earl G. Harrington and Donald

B. Clement, for the Department of the Interior, to William G. Helis, Jr., Chairman, Louisiana State Mineral Board, August 29, 1958

- Exhibit 22** Letter from Gordon Atwater to William G. Helis, Chairman, Louisiana State Mineral Board, February 17, 1959
- Exhibit 23** Letter from Gordon Atwater to Earl J. Thomas, Acting Director, Bureau of Land Management, February 23, 1959
- Exhibit 24** Letter from Edward Woozley, Director, Bureau of Land Management, to the Director, Coast and Geodetic Survey, March 19, 1959
- Exhibit 25** Letter from James C. Tison, Jr., for Rear Admiral H. Harold Karo, Director, Coast and Geodetic Survey, to Gordon Atwater, November 17, 1959
- Exhibit 26** Letter from McLain J. Forman to Rear Admiral H. Arnold Karo, Director, Coast and Geodetic Survey, November 19, 1959
- Exhibit 27** Letter from Donald B. Clement to Gordon Atwater, November 2, 1961
- Exhibit 28** Letter from Gordon Atwater to Donald B. Clement, Consultant, Cadastral Engineering Office, Bureau of Land Management, November 10, 1961

- Exhibit 29** Letter from Gordon Atwater to W. Scott Wilkinson, December 1, 1961
- Exhibit 30** Report of the Determination of the Contact Line of Mean Low Water of the Gulf of Mexico with the Mainland and Adjacent Islands of the State of Louisiana, by a Committee Representing the U.S. Dept. of Interior and a Committee Representing the State of Louisiana, December 20, 1961
- Exhibit 31** John Seldon, *Of the Dominion, or, Ownership of the Sea* (Mare Clausum), transl. by Marchamont Nedham (London, 1652) Book II, Chapter 2, p. 188
- Exhibit 32** *The Anna*, 5 Chr. Robinson, Admiralty Reports 373 (1806).
- Exhibit 33** Letters from Edward Everett, Ambassador to Great Britain, to Lord Aberdeen, British Foreign Secretary, March 25, 1845, and to James Buchanan, Secretary of State, April 23, 1845, S. Exec. Doc. No. 100, 32d Cong., 1st sess. (1852) pp. 136-140, 152.
- Exhibit 34** Seizure in Neutral Waters (the capture of the British ship "Grange" by the French frigate "L' Embuscade" in Delaware Bay), 1 *Op. A.G.* 32 (1793).
- Exhibit 35** Headland, Sketch of Anacapa Island

in Santa Barbara Channel (1854), United States Coast and Geodetic Survey.

- Exhibit 36** Letter from Thomas Bayard, Secretary of State, to Daniel Manning, Secretary of the Treasury, May 28, 1886, in 1 Moore, *Digest of International Law* (1906) 718-721.
- Exhibit 37** S. B. Stanton, *The Behring Sea Controversy*, (1892) 52-57.
- Exhibit 38** *The Washington*, 4 Moore, *International Arbitrations* (1898), 4342-4344.
- Exhibit 39** J. B. Henderson, *American Diplomatic Questions* (1901), 36-37.
- Exhibit 40** H. Taylor, *Treatise on International Public Law*, (1901), 137-139, 278-279.
- Exhibit 41** Whaling and Sealing Arbitration, Oral Argument of the United States, *Foreign Relations of the United States*, 1902, Appendix I, p. 440.
- Exhibit 42** 1 Moore, *Digest of International Law*, (1906) pp. 698-713, 730-731, 734-745, 770-771, 783-787, 866-884, 926.
- Exhibit 43** River and Harbor Lines, 25 *Op. A.G.* 149 (1906).
- Exhibit 44** A. H. Charteris, *Claims of Territorial Jurisdiction in Wide Bays*, (1906-1907) 16 *Yale Law Journal* 471-496.

- Exhibit 45** Correspondence between Carnegie Hero Fund Commission and the Department of State (1909), 3 Letters, Files, United States Department of State, National Archives (Reprinted in 99 Cong. Rec., Part 3, 3622-3623 (1953).
- Exhibit 46** North Atlantic Coast Fisheries Arbitration, S. Doc. No. 870, 61st Cong., 3d sess. (1912) Vol. 1, Report of the Agent of the United States, pp. 18-19 (Cong. Doc. Ser. No. 5929).
- Exhibit 47** North Atlantic Coast Fisheries Arbitration, S. Doc. No. 870, 61st Cong., 3d sess. (1912) Vol. 1, Award of the Tribunal and Dissenting Opinion of Dr. Drago on Question Five, pp. 92-98, 102-106 (Cong. Doc. Ser. No. 5929).
- Exhibit 48** North Atlantic Coast Fisheries Arbitration, S. Doc. No. 870, 61st Cong., 3d sess. (1912) Vol. 8, Argument of the United States, p. 201 (Cong. Doc. Ser. No. 5936).
- Exhibit 49** North Atlantic Coast Fisheries Arbitration, S. Doc. No. 870, 61st Cong., 3d sess. (1912) Vol. 10, Oral Argument of Charles B. Warren for the United States, pp. 1000-1001, 1012-1015, 1078-1089, 1094-1095, 1122-1126, 1201-1227 (Cong. Doc. Ser. No. 5938).
- Exhibit 50** North Atlantic Coast Fisheries Ar-

bitration, S. Doc. No. 870, 61st Cong., 3d sess. (1912) Vol. 11, Oral Argument of Elihu Root for the United States, pp. 2150-2153, 2161, 2166-2169 (Cong. Doc. Ser. No. 5939).

Exhibit 51

Position Taken By This Government in Its Diplomatic Correspondence with Respect to the Three-Mile Limit and Its Extension, Memorandum by the Office of the Solicitor, Department of State, Nov. 30, 1921. Files, United States Department of State, National Archives.

Exhibit 52

Henry S. Fraser, *The Extent and Delimitation of Territorial Waters*, (1926) 11 Cornell L. Q. 455.

Exhibit 53

Memorandum by the Office of the Solicitor, Department of State, March 2, 1926. Files, United States Department of State, National Archives.

Exhibit 54

Letter from W. R. Castle, Jr., for the Secretary of State, to O. C. Kiep, German Charge' d' Affaires ad interim, Oct 6, 1927. United States Department of State, National Archives.

Exhibit 55

A compilation of the Provisions of Law in Force in the United States in Regard to Territorial Waters, Memorandum of Department of State, accompanying letter of Oct. 6, 1927, above. Files, United States

Department of State, National Archives.

- Exhibit 56** Letter from E. F. Morgan, Acting Secretary of Commerce, to the Secretary of State [Frank B. Kellogg] Apr. 24, 1928. Files, United States Department of State, National Archives.
- Exhibit 57** Letter from the Secretary of State to H. H. Bachke, Norwegian Minister (July 11, 1928). Files, United States Department of State, National Archives.
- Exhibit 58** *Territorial Waters and Fishery Boundaries*, Memorandum by the Treaty Division, Department of State, Dec. 7, 1928. Files, United States Department of State, National Archives.
- Exhibit 59** Memorandum by the Treaty Division, Department of State, Dec. 8, 1928. Files, United States Department of State, National Archives.
- Exhibit 60** Memorandum by the Officer of the Solicitor, Department of State, Dec. 17, 1928. Files, United States Department of State, National Archives.
- Exhibit 61** Memorandum by the Division of Western European Affairs, Department of State, Jan. 15, 1929. Files, United States Department of State, National Archives.

- Exhibit 62** Memorandum by the Treaty Division, Department of State, Jan. 18, 1929. Files, United States Department of State, National Archives.
- Exhibit 63** Memorandum by the Treaty Division, Department of State, Jan. 19, 1929. Files, United States Department of State, National Archives.
- Exhibit 64** Letter from W. R. Castle, Jr., for the Secretary of State, to the Secretary of the Navy [Charles Francis Adams], Apr. 22, 1929. Files, United States Department of State, National Archives.
- Exhibit 65** Letter from W. R. Castle, Jr., for the Secretary of State, to the Secretary of the Treasury [Andrew W. Mellon], Apr. 22, 1929. Files, United States Department of State, National Archives.
- Exhibit 66** Letter from C. F. Adams, Secretary of the Navy, to the Secretary of State [Charles Evans Hughes], May 8, 1929. Files, United States Department of State, National Archives.
- Exhibit 67** Letter from W. R. Castle, Jr., for the Secretary of State, to the Secretary of the Treasury [Andrew W. Mellon], May 13, 1929. Files, United States Department of State, National Archives.
- Exhibit 68** Letter from W. R. Castle, Jr., for

the Secretary of State, to Alexis H.G.O. Lundh, Norwegian Charge' d'Affairs ad interim, July 13, 1929. Files, United States Department of State, National Archives.

- Exhibit 69** League of Nations, Conference for the Codification of International Law, Bases of Discussion, Territorial Waters, Vol. 2, p. 38 (1929).
- Exhibit 70** League of Nations, Conference for the Codification of International Law, Bases of Discussion, Territorial Waters, Vol. 2, p. 41 (1929).
- Exhibit 71** League of Nations, Conference for the Codification of International Law, Bases of Discussion, Territorial Waters, Vol. 2, p. 44 (1929).
- Exhibit 72** League of Nations, Conference for the Codification of International Law, Bases of Discussion, Vol. 2, Territorial Waters, 1929, pp. 48-51.
- Exhibit 73** League of Nations, Conference for the Codification of International Law, Bases of Discussion, Territorial Waters, Vol. 2, p. 143 (1929).
- Exhibit 74** League of Nations, Acts of the Conference for the Codification of International Law. Meetings of the Committees, Vol. III, Minutes of the Second Committee; Territorial Waters (C. 351 (b). M. 145 (b). 1930. V) pp. 179-180, 195-200, 205-209, 217-220.

- Exhibit 75** S. W. Boggs, *Delimitation of the Territorial Sea*, 24 *American Journal of International Law* (1930) 541-555.
- Exhibit 76** *U. S. Coast Guard Boarding Manual* (1931) 3, 15, 16.
- Exhibit 77** 1 Hackworth, *Digest of International Law* (1940) 625-626, 634, 643-645.
- Exhibit 78** Letter from S. W. Boggs, for the Secretary of State, to R. J. Allison, Washington National Insurance Co., Feb. 20, 1941. Files, United States Department of State, National Archives.
- Exhibit 79** U.S. Coast Guard Institute, *Admiralty Law Enforcement* (1943) 24-27.
- Exhibit 80** Annex 42 to the British Reply, 2 *Pleadings, Oral Arguments, Documents, Fisheries Case, I.C.J.*, pp. 752-753 (1951).
- Exhibit 81** British Reply, Fisheries Case, Vol. 2, Annex 42, Fig. 1, facing p. 32.
- Exhibit 82** Annexes 46 and 47 to the British Reply, 2 *Pleadings, Oral Arguments, Documents, Fisheries Case, I.C.J.*, pp. 763-764 (1951).
- Exhibit 83** Note from United States to Egypt, June 4, 1951, and note from the United States to Ecuador, June 7, 1951, 4 *Pleadings, Oral Arguments,*

- Documents, Fisheries Case*, I.C.J., pp. 603-604, (1951).
- Exhibit 84** Judgment, *Fisheries Case*, I.C.J. Reports (1951) 116 at 128.
- Exhibit 85** Judgment, *Fisheries Case*, I.C.J. Reports (1951) 116 at 132.
- Exhibit 86** Judgments, *Fisheries Case*, I.C.J. Reports (1951) 116 at 139.
- Exhibit 87** S. W. Boggs, *Delimitation of Seaward Areas Under National Jurisdiction* (1951), 45 American Journal of International Law, pp. 240-266 (reprint).
- Exhibit 88** Report of the Special Master (Under Order of December 3, 1951) (1952), United States Supreme Court Records, *United States v. California*, No. 6, Original, October Term, 1952 (Now No. 5, Original).
- Exhibit 89** A. L. Shalowitz, *The Concept of a Bay as Inland Waters*, (1953), 13 Surveying and Mapping, pp. 432-440 (reprint).
- Exhibit 90** Letter from Francis P. Whitechair, Secretary of the Navy, to Emanuel Celler, Chairman, House Committee on the Judiciary, April 25, 1952; Hearings, S. Committee on Interior and Insular Affairs, S. J. Res. 13, 83 Cong., 1st sess. (1953) pp. 135-136.
- Exhibit 91** Fitzmaurice, *The Law and Procedure*

of the International Court of Justice 1951-54: General Principles and Sources of Law (1953) 30 British Yearbook of International Law, 1, 27.

Exhibit 92

Letter, from Thruston B. Morton, for the Secretary of State, to Senator Hugh Butler, Chairman, Senate Committee on Interior and Insular Affairs, March 4, 1953; Letter, from Senator Henry M. Jackson to John Foster Dulles, Secretary of State, February 12, 1953; Letter, from Thruston B. Morton, for the Secretary of State, to Senator Henry M. Jackson, March 6, 1953. Hearings, S. Committee on Interior and Insular Affairs, S. J. Res. 13, 83rd Cong., 1st sess. (1953) pp. 27, 28, 1086, 1087, 1088.

Exhibit 93

Letter, from James E. Webb, Under Secretary of State, to J. Howard McGrath, Attorney General, November 13, 1951; Letter, from Dean Acheson, Secretary of State, to J. Howard McGrath, Attorney General, February 12, 1952. Hearings, S. Committee on Interior and Insular Affairs, S. J. Res. 13, 83rd Cong., 1st sess. (1953) pp. 460-462.

Exhibit 94

United States Coast Guard, *Law Enforcement Manual* (CG-6T) (1954), p. 3-7.

Exhibit 95

Draft Articles on the Law of the Sea,

Article 4 and Commentary, Report of the International Law Commission to the General Assembly Covering the Work of its Eighth Session, 2 *Yearbook of the I.L.C.*, 1956, pp. 266-267.

- Exhibit 96** Draft Articles on the Law of the Sea, Article 4 and Comment, Report of the International Law Commission to the General Assembly Covering the Work of its Seventh Session, 2 *Yearbook of the I.L.C.*, 1955, p. 35.
- Exhibit 97** *Historic Bays*, Memorandum by the Secretariat of the United Nations, United Nations Conference on the Law of the Sea, Official Records, Vol. 1; Preparatory Documents (A/CONF. 13/37) (1958), pp. 1-38.
- Exhibit 98** Bishop, *Cases and Materials on International Law* (1962), pp. 500-501.
- Exhibit 99** *Juridical Regime of Historic Waters, Including Historic Bays*, Study prepared by the Secretariat, United Nations Document A/CN.4/143, 9 March 1962.
- Exhibit 100** Letter, from Abram Chayes, for the Acting Secretary of State, to Frank J. Barry, Solicitor, Department of the Interior, May 3, 1962; Files, Department of Justice.

- Exhibit 101** Strohl, *International Law of Bays* (1963) 63.
- Exhibit 102** Letter, from Dean Rusk, Secretary of State, to Robert F. Kennedy, Attorney General, January 15, 1963; Files, Department of Justice.
- Exhibit 103** Diagram of Monterey Bay; Brief in Support of the Exceptions of the State of California to the Report of the Special Master dated October 14, 1952, Pursuant to Court Order of December 2, 1963, *United States v. California*, S. Ct. No. 5, Original, October Term, 1963, Vol. 2, Appendices, facing p. 152.
- Exhibit 104** Convention on the Territorial Sea and the Contiguous Zone, 15 U.S.T., Part 1, pp. 1608-1614.
- Exhibit 105** *Selected Materials on Coast Guard Law Enforcement* (1964), p. 4-5.
- Exhibit 106** 2 Shalowitz, *Shore and Sea Boundaries* (1964), pp. 104-105.
- Exhibit 107** Letter, from Vice Admiral P. E. Trimble, Acting Commandant, United States Coast Guard, to Senator Allen J. Ellender, August 15, 1967; Files, United States Coast Guard, Washington, D.C.
- Exhibit 108** Letter, from Leonard C. Meeker, Legal Adviser, Department of State, to Erwin Griswold, Solicitor General, April 8, 1969; Files, Department of Justice.

- Exhibit 109** Letter, from Leonard C. Meeker, Legal Adviser, Department of State, to Shiro Kashiwa, Assistant Attorney General, July 3, 1969; Files, Department of Justice.
- Exhibit 110** Letter, from John N. Mitchell, Attorney General, to William P. Rogers, Secretary of State, January 30, 1970; Files, Department of State.
- Exhibit 111** Address by The Honorable John R. Stevenson, The Legal Adviser of the Department of State, Department of State Press Release No. 49, February 18, 1970, United States Department of State, Press Release. Reprinted in 62 State Department Bull. 339-343.
- Exhibit 112** President's Report to the Congress, United States Foreign Policy for the 1970's; A New Strategy for Peace. Weekly Compilation of Presidential Documents, Vol. 6, No. 8, (February 23, 1970), p. 226.
- Exhibit 113** U. S. Position on Territorial Sea, Department of State Press Release No. 64, February 25, 1970.
- Exhibit 114** Letter, from William P. Rogers, Secretary of State, to John N. Mitchell, Attorney General, April 14, 1970; Files, Department of Justice.
- Exhibit 115** Act No. 452, July 19, 1962, Louisiana Session Laws, 1962, pp. 909-911.

- Exhibit 116** *Development of the So-Called Chapman Line*; Memorandum by Earl J. Harrington, June 27, 1956. Files, United States Department of the Interior, Bureau of Land Management, Washington, D. C.
- Exhibit 117** Chapman Line (Description). Files, United States Department of Justice.
- Exhibit 118** Letter from Oscar L. Chapman, Secretary of the Interior, to O. G. Collins, Chairman, Louisiana State Mineral Board, July 20, 1951. 97 *Cong. Rec.* 9170-9171 (1951).
- Exhibit 119** Excerpt from Minutes of July 20, 1956, Meeting of State Mineral Board. Produced by Counsel for Louisiana during the Deposition of Dr. Gordon Atwater, July 15, 1970.
- Exhibit 120** Letter from Robert W. Knox, Assistant Director, U. S. Coast and Geodetic Survey, to Donald Clement, Bureau of Land Management, Jan. 28, 1957. Files, Department of the Interior, Bureau of Land Management. Washington, D. C.
- Exhibit 121** Letter from Mr. Earl G. Harrington, for the Director, Bureau of Land Management, to Gordon Atwater, Jan. 30, 1957. Files, Department of the Interior, Bureau of Land Management, Washington, D. C.
- Exhibit 122** Letter from Mr. Earl G. Harrington, for the Director, Bureau of Land

Management, to Gordon Atwater, Feb. 6, 1957. Files, Department of the Interior, Bureau of Land Management, Washington, D. C.

Exhibit 123 Letter from Gordon Atwater to Edward Woozley, Director, Bureau of Land Management, Feb. 8, 1957. Files, Department of the Interior, Bureau of Land Management, Washington, D. C.

Exhibit 124 Letter from Gordon Atwater to Earl J. Harrington, Feb. 8, 1957. Files, Department of the Interior, Bureau of Land Management, Washington, D. C.

Exhibit 125 Letter from Edward Woozley, Director, Bureau of Land Management, to the Director, U.S. Coast and Geodetic Survey, February 14, 1957. Files, Department of the Interior, Bureau of Land Management, Washington, D.C.

Exhibit 126 Letter from Edward Woozley, Director, Bureau of Land Management, to Gordon Atwater, Feb. 14, 1957. Files, Dept. of the Interior, Bureau of Land Management, Washington, D.C.

Exhibit 127 Memorandum from Earl G. Harrington, Cadastral Engineering Staff Officer, Bureau of Land Management, Department of the Interior, to the Solicitor, Department of Interior,

- Mar. 18, 1957. Files, Department of the Interior, Bureau of Land Management, Washington, D.C.
- Exhibit 128** Letter from Edward Woozley, Director, Bureau of Land Management, to Gordon Atwater, Mar. 19, 1959. Files, Dept. of the Interior, Bureau of Land Management, Washington, D.C.
- Exhibit 129** Letter from Gordon Atwater to Edward Woozley, Director, Bureau of Land Management, Department of the Interior, April 9, 1959. Files, Department of the Interior, Bureau of Land Management, Washington, D.C.
- Exhibit 130** Mississippi River Commission, Corps of Engineers, United States Army, *Annual Maximum, Minimum and Mean Discharges of the Mississippi River and Its Outlets and Tributaries to 1963*, pp. 31-32.
- Exhibit 131** Mississippi River Commission, Corps of Engineers, U.S. Army, *Stages and Discharges Mississippi River and Its Outlets and Tributaries*, 1940, p. 51.
- Exhibit 132** Mississippi River Commission, Corps of Engineers, U.S. Army, *Stages and Discharges Mississippi River and Its Outlets and Tributaries*, 1946, p. 49, 229 and 230.
- Exhibit 133** Mississippi River Commission, Corps of Engineers, U.S. Army, *Stages and*

Discharges Mississippi River and Its Outlets and Tributaries, 1949, p. 46.

- Exhibit 134** Mississippi River Commission, Corps of Engineers, U.S. Army, *Stages and Discharges Mississippi River and Its Outlets and Tributaries*, 1949, p. 46.
- Exhibit 135** Mississippi River Commission, Corps of Engineers, U.S. Army, *Stages and Discharges Mississippi River and Its Outlets and Tributaries*, 1954, p. 46.
- Exhibit 136** Mississippi River Commission, Corps of Engineers, U.S. Army, *Stages and Discharges Mississippi River and Its Outlets and Tributaries*, 1956, p. 48.
- Exhibit 137** Mississippi River Commission, Corps of Engineers, U. S. Army, *Stages and Discharges Mississippi River and Its Outlets and Tributaries*, 1957, p. 48.
- Exhibit 138** Mississippi River Commission, Corps of Engineers, U. S. Army *Stages and Discharges Mississippi River and Its Outlets and Tributaries*, 1958, p. 47
- Exhibit 139** Mississippi River Commission, Corps of Engineers, U. S. Army, *Stages and Discharges Mississippi River and Its Outlets and Tributaries*, 1960, p. 48.
- Exhibit 140** Mississippi River Commission, Corps of Engineers, U. S. Army, *Stages and Discharges Mississippi River and Its Tributaries*, 1960, p. 53.
- Exhibit 141** Mississippi River Commission, Corps of Engineers, U. S. Army, *Stages and*

- Discharges Mississippi River and Its Outlets and Tributaries*, 1961, p. 53.
- Exhibit 142** Mississippi River Commission, Corps of Engineers, U. S. Army, *Stages and Discharges Mississippi River and Its Outlets and Tributaries*, 1965, pp. 5-6.
- Exhibit 143** Draft page of U. S. Army, Corps of Engineers, New Orleans District, *Stages and Discharges Mississippi River and Its Outlets and Tributaries*, 1969.
- Exhibit 144** Published Nautical Chart 1272, Mississippi River Delta, 24th Ed., Dec. 6, 1969.
- Exhibit 145** Field Inspection Note Book: Project 20,000-819, Miss. River Delta Mean Low Water Line. Files, United States Coast and Geodetic Survey.
- Exhibit 146** Report, S. Committee on Transportation Routes to the Seaboard, on Senate Bills 178 and 577. S. Rept. No. 373, 43d Congress, 1st Sess. (1874), pp. 1-8.
- Exhibit 147** The Jetties and the Mississippi River Improvement; Grand Banquet to Capt. James B. Eads, Report of the Proceedings, Library of Congress, Catalogue No. TA140 E2 G4
- Exhibit 148** Affidavit of Sam Sutton, Chief, Reproduction Branch, U. S. Army Corps of Engineers, New Orleans District, Aug. 17, 1970.

- Exhibit 149** U. S. Army, Corps of Engineers Photographs 8468-3.
- Exhibit 150** U. S. Army, Corps of Engineers Photograph 11872-5.
- Exhibit 151** U. S. Army, Corps of Engineers Photograph 11872-20.
- Exhibit 152** U. S. Army, Corps of Engineers Photograph 11880-1.
- Exhibit 153** U. S. Army, Corps of Engineers Photograph 7833-27.
- Exhibit 154** U. S. Army, Corps of Engineers Photograph 11872-19.
- Exhibit 155** Photograph, Frame B: South Pass Entrance looking east along the hook, June 9, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass.
- Exhibit 156** Photograph, Frame C: The hook at South Pass Entrance, June 9, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass.
- Exhibit 157** United States Department of the Interior, Noncompetitive Oil and Gas Lease, Serial Number BLM A-040049. Files, United States Department of the Interior, Bureau of Land Management, Washington, D. C.
- Exhibit 158** Aerial Photomosaic, Pass a Loutre. Files, Liskow and Lewis, 225 Baronne St., New Orleans, Louisiana.

- Exhibit 159** Letter dated March 20, 1963, from Austin W. Lewis to Archibald Cox, Solicitor General. Files Department of Justice.
- Exhibit 160** Photographs Nos. 1, 2, 5, 6, 7, 10, 11, 12, 14 15 and 17 taken by S. V. Asbury Jr., May 31, 1960. Files, Department of Justice, Washington, D. C.
- Exhibit 160A** Reproduction of part of Map 2 of 8, showing location of Asbury photographs.
- Exhibit 160B** Original contact prints of Asbury photographs (introduced for inspection and withdrawn, subject to re-examination if necessary).
- Exhibit 161** Affidavit of Mr. Jonathan I. Charney, Attorney, Department of Justice, Washington, D. C., August 31, 1971.
- Exhibit 162** Photographs A and B taken by Jonathan I. Charney, June 20, 1970.
- Exhibit 163** Photograph, Frame A: Southeast Pass looking north from the Gulf of Mexico, June 9, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass.
- Exhibit 164** A portion of U.S.C. & G.S. Topographic Survey Number 3630 (1916) (mounted).
- Exhibit 164-A** Same, unmounted (originally num-

bered 164; renumbered 164A, January 26, 1971).

- Exhibit 165** A portion of U.S.C. & G.S. Hydrographic Survey Number 6637 (1946) (mounted).
- Exhibit 165A** Same, unmounted (originally numbered 165; renumbered 165A, January 26, 1971).
- Exhibit 166** Permit issued May 21, 1956, to Gulf Refining Company by the Corps of Engineers, U. S. Army. Files, United States Army Engineer District, New Orleans, Corps of Engineers, P.O. Box 60267, New Orleans, Louisiana.
- Exhibit 167** Letter from Lt. Col. R. G. Hodes to Gulf Refining Company, May 22, 1956. Files, Corps of Engineers, U.S. Army, United States Army Engineer District, New Orleans, Corps of Engineers, P.O. Box 60267, New Orleans, Louisiana.
- Exhibit 168** Letter, from J. A. Austin, District Service Manager, Gulf Oil Corporation, to U.S. Army District Engineer. Files, Gulf Oil Corp., P.O. Box 61590, New Orleans, Louisiana.
- Exhibit 169** Letter, from J. A. Austin to U.S. Army District Engineer, July 6, 1959. Files, Gulf Oil Corp., P.O. Box 61590, New Orleans, Louisiana 70160.
- Exhibit 170** Bill from Circle Dredging Co., Inc.,

- to Gulf Oil Corporation, August 20, 1959. Files, Gulf Oil Corp., P. O. Box 61590 New Orleans, Louisiana 70160.
- Exhibit 171** Sheets 1A and 1 of 14 to accompany Gulf Oil Corp. application dated March 28, 1956. Files, Gulf Oil Corp., P.O. Box 61590, New Orleans, Louisiana 70160.
- Exhibit 172** Letter, from J. A. Austin to U. S. Army, District Engineer, September 28, 1959. Files, Gulf Oil Corp., P.O. Box 61590, New Orleans, Louisiana 70160.
- Exhibit 173** Letter, from J. A. Austin to U. S. Army District Engineer, September 29, 1959. Files, Gulf Oil Corp., P.O. Box 61590, New Orleans, Louisiana 70160.
- Exhibit 174** Letter, from J. A. Austin to U. S. Army District Engineer, December 3, 1959. Files, Gulf Oil Corp., P.O. Box 61590, New Orleans, Louisiana 70160.
- Exhibit 175** Letter from J. A. Austin to U. S. Army District Engineer, December 21, 1959. Files, Gulf Oil Corp., P.O. Box 61590, New Orleans, Louisiana 70160.
- Exhibit 176** Photograph, Frame D: Pass Tante Phine Entrance viewed from the west, June 9, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass.

- Exhibit 177** Photograph, Frame E: Pass Tante Phine entrance viewed from the west, June 9, 1962. Woods Hole, Oceanographic Institution Data Library, Woods Hole, Mass.
- Exhibit 177** Photograph, Frame E: Pass Tante Phine entrance viewed from the west, June 9, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass.
- Exhibit 178** Photograph, Frame F: Dredged area north of Pass Tante Phine Entrance, June 9, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass. 02543.
- Exhibit 179** Hydrographic Survey, Pass Tante Phine Spoil Bank, August 4, 1966. U.S. Corps of Engineers, New Orleans, District.
- Exhibit 180** A Portion of U.S.C. & G.S. Hydrographic Survey Number 6172 (1936). U.S. Coast and Geodetic Survey.
- Exhibit 181** Department of Transportation, United States Coast Guard, *Light List, Vol. II, Atlantic and Gulf Coast of the United States* (1968) pp. 247-48.
- Exhibit 182** Office Memorandum, from Lt. Robert C. Phillips, USCG, to Chief, Aids to Navigation Section, July 3, 1953. Files, United States Coast Guard, 8th District.

- Exhibit 183** Letter from Jules Minnich, Terrebonne-LaFourche Boatmen's Association, to the Commandant, U.S.C.G., 8th District, July 7, 1953. Files, United States Coast Guard, 8th District.
- Exhibit 184** Project Report for Advance Program of Acquisition, Construction and Improvement, dated October 1, 1953. Files, United States Coast Guard, 8th District.
- Exhibit 185** Aids to Navigation Operation Request, dated December 8, 1953. Files, United States Coast Guard, 8th District.
- Exhibit 186** Letter from Mr. Ralph B. Bisland, Secretary Treasurer, Terrebonne Parish Police Jury, to Commander Coast Guard, Eighth Naval District, May 29, 1957. Files, United States Coast Guard, 8th District.
- Exhibit 187** Affidavit of Jonathan I. Charney, Attorney, Department of Justice, Washington, D. C.
- Exhibit 188** Photographs C and D taken by Jonathan I. Charney, June 20 and 22, 1970.
- Exhibit 189** Photographs E and F taken by Jonathan I. Charney, June 20, 1970.
- Exhibit 190** Affidavit of Mrs. D. T. Atkinson.
- Exhibit 190A** Photograph Roll 5-A No. 7 taken by John R. May, Geographer, Geology

Branch, Waterways Experiment Station, Vicksburg, Mississippi, June 22, 1970.

- Exhibit 191** A portion of U.S.C. & G.S. Hydrographic Survey Number 5537 (1934) (mounted).
- Exhibit 191A** Same, unmounted (originally numbered 191; renumbered 191A, January 26, 1971).
- Exhibit 192** Affidavit of Jonathan I. Charney, Department of Justice, Washington, D. C. 20530.
- Exhibit 193** Photograph G taken by Joanthan I. Charney.
- Exhibit 194** Photograph, Frame G: Point au Fer viewed from the west, June 10, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass. 02543.
- Exhibit 195** Executive Order, Reservation of Shell Keys for a Light House, July 9, 1855. National Archives, Washington, D.C.
- Exhibit 196** Executive Order, Shell Keys Reservation, August 17, 1907. National Archives, Washington, D. C.
- Exhibit 197** Photograph, Frame H: Southern Shore of Marsh Island, June 10, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass. 02543.

- Exhibit 198** Photograph, Frame I: Southern Shore of Marsh Island, June 10, 1962. Woods Hole Oceanographic Institution Data Library, Woods Hole, Mass. 02543.
- Exhibit 199** Photograph 66-HC-1793, Western Coast of Louisiana, Gemini Flight 9, Magazine 9, Frame 40, Height- 160 nautical miles, September 14, 1966, National Aeronautics Service Administration.
- Exhibit 200** Report to Bureau of Land Management, Mean Low Water Line Survey for Nine Specific Areas, Mississippi River Delta Louisiana, Mississippi River Delta Louisiana, 1970 (In ten volumes). U. S. Coast and Geodetic Survey.
- Exhibit 201** Maps Illustrative of Issues. United States Department of Justice.
- Exhibit 202** *Geological Observations on the Origin, Nature and Distribution of Mudlumps, Barrier Islands and Oyster Reefs of Coastal Louisiana*, by C. R. Kolb and R. T. Saucier (August 1970).
- Exhibit 203** *Appendix A of Geological Observations on the Origin, Nature and Distribution of Mudlumps, Barrier Islands and Oyster Reefs of Coastal Louisiana*, by C. R. Kolb and R. T. Saucier (August 1970).
- Exhibit 204** Affidavit of Mr. R. J. Simon.

Exhibit 205	Affidavit of Mr. Ellwood Ott.
Exhibit 206	Affidavit of Mr. E. T. Oliver.
Exhibit 207	Affidavit of Mr. Harland R. Cravat.
Exhibit 208	Affidavit of Mr. Harland R. Cravat.
Exhibit 209	Affidavit of Mr. Erwin L. Methe.
Exhibit 210	Affidavit of Mr. Erwin L. Methe.
Exhibit 211	Affidavit of Mr. D. T. Atkinson.
Exhibit 212	Affidavit of Mr. Paul W. Scoggan.
Exhibit 213	Aerial Photographs Nos.: INO-1-204, INO-1-154, INO-1-158
Exhibit 214	Aerial Photographs Nos.: 25, 24, 23, 22, 21, 20, of V311RW M1063
Exhibit 215	Aerial Photographs Nos.: M-16-90A-4, M-16-90-70, M-16-90A-2
Exhibit 216	Aerial Photographs Nos.: M-17-89-42, M-17-88-3
Exhibit 217	Aerial Photographs Nos.: 724-190 - 724-194
Exhibit 218	Aerial Photographs Nos.: 724-204, 724-203, 724-202, 724-201, 724-200
Exhibit 219	Aerial Photographs Nos.: 24-104 - 24-107
Exhibit 220	Aerial Photographs Nos.: 24-116, 24-115, 24-114
Exhibit 221	Aerial Photographs Nos.: 927-932
Exhibit 222	Aerial Photographs Nos.: 591-596
Exhibit 223	Aerial Photographs Nos.: 547X2-551X2

- Exhibit 224** Aerial Photographs Nos.: 325X3, 326X3, 343X3, 342X3, 341X3, 355X3, 356X3
- Exhibit 225** Aerial Photographs Nos.: L6947 - L6952
- Exhibit 226** Aerial Photographs Nos.: 7-59 142 - 7-59 145
- Exhibit 227** Aerial Photographs Nos.: L8845, L9092, L9091, L9121
- Exhibit 228** Aerial Photographs Nos.: 9-60 61, 9-60 62
- Exhibit 229** Aerial Photographs Nos.: 6-61-113, 6-61-112, 6-61-110, 6-61-111
- Exhibit 230** Aerial Photographs Nos.: 6052-7-90 - 6052-7-92
- Exhibit 231** Aerial Photographs Nos.: S8991 - S8996
- Exhibit 232** Aerial Photographs Nos.: 59-67, 59-65, 59-59, 59-61, 59-64, 59-63
- Exhibit 233** Aerial Photographs Nos.: 57-171, 57-172, 57-174, 57-173
- Exhibit 234** Aerial Photographs Nos.: INO-1-94, INO-1-88
- Exhibit 235** Aerial Photographs Nos.: INO-2-46, INO-2-3
- Exhibit 236** Aerial Photographs Nos.: R182-59-A-6, R182-59-A-5, R182-59-A-4, R182-59A-3, R182-59-A-2
- Exhibit 237** Aerial Photographs Nos.: R182-59-B-41 - R182-59-B-43

- Exhibit 238** Aerial Photographs Nos.: M21-93-66 and M21-92-41 - M21-92-45
- Exhibit 239** Aerial Photographs Nos.: 289, 288, 287, 286, 285, 284
- Exhibit 240** Aerial Photographs Nos.: 578 - 580
- Exhibit 241** Aerial Photographs Nos.: 914, 915
- Exhibit 242** Aerial Photographs Nos.: 27-27, 24-186, 24-190, 24-141
- Exhibit 243** Aerial Photographs Nos.: 705 33E 2619, 705 33E 2618, 705 33E 2617
- Exhibit 244** Aerial Photographs Nos.: 724-83, 724-84, 724-85
- Exhibit 245** Aerial Photographs Nos.: 724-95 - 724-97
- Exhibit 246** Aerial Photographs Nos.: 217X3, 218X3, 265X3, 264X3, 269X3, 314X3
- Exhibit 247** Aerial Photographs Nos.: L6967, L6966, L6965, L6964
- Exhibit 248** Aerial Photographs Nos.: 052-5-68 - 6052-5-70
- Exhibit 249** Aerial Photographs Nos.: 60-37, 60-35, 60-36, 60-4, 60-3, 60-2, 60-1
- Exhibit 250** Aerial Photographs Nos.: L8287R, L8286R, L8285R, L8284R, L8283R, L8282R, L8281R, L8280R, L8279R, E4982, E4981, E4980, E4979, E4978, E4977, E4976, E4975, L8188R, L8187R, L8186R, L8185R, L8184R, L8183R, L8182R, L8181R, E4879,

- E4878, E4877, E4876, E4875, E4874, E4873, E4872.
- Exhibit 251** Aerial Photographs Nos.: L8091R, L8090R, L8089R, L8088R, L8087R, L8086R, L8085R, L8084R, L8083R, E4780, E4779, E4778, E4777, E4776, E4775, E4774, E4773, E4772, L8323R, L8322R, L8321R, L8320R, L8319R, L8318R, L8317R, L8316R, E5019, E5018, E5017, E5016, E5015, E5014, E5013, E5012.
- Exhibit 252** Aerial Photographs Nos.: E5035 - E5049, L8339R - L8353R
- Exhibit 253** Coastline Undisputed
- Exhibit 254** Coastline Disputed
- Exhibit 254A** Coastline Disputed Revised December 10, 1970
- Exhibit 255** Undisputed Offshore Line
- Exhibit 256** Offshore Line Disputed
- Exhibit 256A** Offshore Line Disputed Revised December 10, 1970
- Exhibit 257** Sheet L36, Photomosaic, Ammann International, San Antonio, Texas.
- Exhibit 258** Sheet L37, Photomosaic, Ammann International, San Antonio, Texas.
- Exhibit 259** Uncontrolled mosaic prepared from aerial photos flown Dec. 1968, Photo 71, File No. 8-3, Corps of Engineers, U.S. Army Engineer District, New Orleans.

- Exhibit 260** Uncontrolled mosaic prepared from aerial photos flown Dec. 1968, and March 1969, Photo 83, File No. 8-3, Corps of Engineers, U.S. Army Engineer District, New Orleans.
- Exhibit 261** Affidavit of Donald B. Wilson
- Exhibit 262** Affidavit of Harland T. Cravat, U.S.C. & G.S.
- Exhibit 263** Affidavit of William M. Dunkle, Jr., Woods Hole Oceanographic Institute
- HEARINGS IN NEW ORLEANS
- Exhibit 264A** Sketch of an eroding bay, by Leo Bouchez.
- Exhibit 265** Sketch of average penetration of a bay, by Leo Bouchez.
- Exhibit 266** Bureau of Land Management leasing map, Louisiana outer continental shelf, showing leases maintained under section 6 of the Outer Continental Shelf Lands Act.
- Exhibit 267** Map showing route of coast flight by Special Master and counsel, October 18, 1970 (two sheets).
- Exhibit 268A** Bennett G. Jones deposition, vol. 1.
- Exhibit 268B** Bennett G. Jones deposition, vol. 2.
- Exhibit 269** Gordon Atwater deposition.
- Exhibit 270** Newton Beauvais deposition.
- Exhibit 271** Sketch of sine curve wave and mud-lump (accompanying cross-examination of Curtis L. Buttorff).

- Exhibit 272** Sketch of Mudlump 90, by Curtis L. Buttorff.
- Exhibit 273** Letter of April 29, 1959, from Mr. Austin, Gulf Oil Company to the Corps of Engineers, U.S. Army.
- Exhibit 274** Letter of June 11, 1964, from Mr. Price, Gulf Oil Company, to the Corps of Engineers, U.S. Army.
- Exhibit 275** Bureau of Land Management records of leases maintained under section 6 of the Outer Continental Shelf Lands Act.
- Exhibit 276** Report on Wind and Weather Conditions, by Arthur Cooperman.
- Exhibit 277** Map of Shell Keys (Copy of No. 17 in U.S. Exh. No. 201) marked by Alexander Melamid to delimit the mainland.
- Exhibit 278A** Map of Isle Dernier (copy of No. 14 in U.S. Exh. No. 201) showing route of David Morgan - Frederick Ellis trip, September 5, 1970.
- Exhibit 278B** Xerox copy of part of Map 19 of 41, showing location of David Morgan photo No. 1.
- Exhibit 278C** Same, photo No. 2
- Exhibit 278D** Same, photo No. 3
- Exhibit 278E** Xerox copy of part of Map 19 of 41, showing location of David Morgan photo No. 4.
- Exhibit 278F** Same, photo No. 5.

Exhibit 278G Same, photo No. 6.

Exhibit 279 Notes by Mr. Francis Zimmerman.

HEARINGS IN WASHINGTON

Exhibit 280 1. Letter, October 24, 1969, to Victor Sachse from George Swarth, submitting three informal survey interrogatories.

2. Letter, February 24, 1970, to Frederick W. Ellis from Jonathan Charney, enclosing transcript of Rhode Island Conference of 1966.

3. Letter, April 28, 1970, to Louis F. Claiborne from Frederick Ellis, enclosing their replies to our three survey interrogatories of October 24, 1969.

Exhibit 281 1. Letter, January 20, 1970, to Victor Sachse from George Swarth, submitting interrogatories to the State of Louisiana.

2. Letter, May 7, 1970, to Walter Armstrong from Frederick Ellis, enclosing Preliminary Response to the Informal Interrogatories Addressed by the United States to the State of Louisiana on January 20, 1970.

3. Letter, August 19, 1970, to Peter Strauss from Frederick Ellis enclosing exhibit "Bucket Bend Bay" to satisfy interrogatories of January 20, 1970.

Exhibit 282

1. Letter, April 8, 1970, to Victor Sachse from Jonathan Charney, requesting minutes of the Louisiana State Mineral Board on the subject of mean low-water line survey from 1956-1961.
2. Letter, April 21, 1970, to Jonathan Charney from Victor Sachse, advising State Mineral Board is gathering the material requested.
3. Letter, August 7, 1970, to Jonathan Charney from Victor Sachse, advising he had felt the request was satisfied but inform him of what we desire and he will again request if from the State Mineral Board.
4. Letter, August 17, 1970, to Victor Sachse from George Swarth, advising him of the materials we want from the State Mineral Board.

Exhibit 283

1. Letter, July 1, 1970, to Victor Sachse from George Swarth, submitting First Formal Interrogatories to the Defendant, State of Louisiana and Request for Production of Documents Number One.
2. Answers and Objections of the Defendant, State of Louisiana, to the First Formal Interrogatories and Request for Production of

Documents Number One of the United States, dated Aug. 5, 1970.

- Exhibit 284**
1. Letter, August 14, 1970, to Victor Sachse from George Swarth, submitting United States First Formal Request for Admissions.
 2. Letter, September 15, 1970, to Peter Strauss from Frederick Ellis, enclosing the State of Louisiana's Answer to First Formal Request for Admissions.
- Exhibit 285**
1. United States Second Formal Request for Admissions, dated August 19, 1970.
 2. Response to United States Second Formal Request for Admissions, dated September 18, 1970.
- Exhibit 286**
- Second Formal Interrogatories to the Defendant, State of Louisiana, dated August 19, 1970.
- Exhibit 287**
1. United States Fourth Formal Request for Admission, dated September 1, 1970.
 2. Response to United States Fourth Formal Request for Admissions, dated September 18, 1970.
- Exhibit 288**
- Certified copy of Diplomatic Note from the Department of State to the Charge d'Affaires ad interim of Germany, sent October 6, 1927, Files, United States Department of State.

- Exhibit 289** Certified copy of a compilation of the provisions of law in force in the United States in regard to territorial waters, Files, United States Department of State.
- Exhibit 290** Certified copy of a Note sent July 11, 1928, from the Department of State to the Minister of Norway, Files, United States Department of State.
- Exhibit 291** Certified copy of an Inter Bureau memorandum dated December 7, 1928, Files, United States Department of State.
- Exhibit 292** Certified copy of a Diplomatic Note from the Department of State to the Charge d'Affaires ad interim of Norway sent July 13, 1929, Files, United States Department of State.
- Exhibit 293** Certified copy of an Aide-Memoire from the Department of State to Norwegian Embassy, sent September 29, 1949, Files, United States Department of State.
- Exhibit 294** Certified copy of a Diplomatic Note from the Ambassador of Japan to the Secretary of State delivered on May 3, 1962, Files, United States Department of State.
- Exhibit 295** Hawkins, Pleas of the Crown, 6th ed., 1787, p. 73.
- Exhibit 296** *Hale's DeJure Maris, Hargrave's Law Tracts*, pp. 10, 11.

- Exhibit 297** *Coke's Institutes*, Part 4, 1797, pp. 135, 140-141.
- Exhibit 298** East, *Pleas of the Crown*, Vol. II, 1803, pp. 802-804.
- Exhibit 299** Message of the President of the United States, Communicating the Proceedings of the Commissioners for the Adjustment of Claims under the Convention with Great Britain of February 8, 1853 (Schooner Washington), August 11, 1856, S. Exec. Doc. No. 103, 34th Cong., 1st sess. [Cong. Doc. Ser. No. 824], pp. 170-186.
- Exhibit 300** *Regina v. Cunningham*, Bell's Crown Cases, 1858-1860, pp. 72-86.
- Exhibit 301** Woolsey, *Introduction to the Study of International Law* 6th ed., (1899), pp. 76-77.
- Exhibit 302** Gould, *A Treatise on the Law of Waters, Including Riparian Rights, and Public and Private Rights in Waters Tidal and Inland* (3rd ed., 1900), pp. 14-16.
- Exhibit 303** Gregory, *The Recent Controversy as to the British Jurisdiction Over Foreign Fishermen More Than Three Miles from Shore: Nortensen v. Peters*, 1 Am. Pol. Sci. Rev. (1906-1907), pp. 410-437.
- Exhibit 304** Fulton, *Sovereignty of the Sea*, pp. 188, 618-621, 696-698 (1911).

- Exhibit 305** Hyde, *International Law Chiefly as Interpreted and Applied by the United States*, Vol. I, pp. 251-267 (1922).
- Exhibit 306** Hurst, *The Territoriality of Bays*, III British Yearbook of International Law, 1922-1923, pp. 42-54.
- Exhibit 307** Hurst, *Whose is the Bed of the Sea?*, IV British Yearbook of International Law (1923-1924), pp. 34-43.
- Exhibit 308** Jessup, *The Law of Territorial Waters and Maritime Jurisdiction* (1927), pp. 13-18 and 355-362.
- Exhibit 309** League of Nations, Acts of the Conference for the Codification of International Law, Meetings of the Committees, Vol. III (1930), pp. 218-219.
- Exhibit 310** Hackworth, *Digest of International Law*, Vol. II (1941), pp. 679-680.
- Exhibit 311** Vallat, Note, XXIII the British Yearbook of International Law, 1946, pp. vi, 333-338.
- Exhibit 312** Lauterpacht, *Sovereignty Over Submarine Areas*, XXVII B.Y.B.I.L. (1950), pp. 376-433.
- Exhibit 313** Judgment, *Fisheries Case*, I.C.J. Reports (1951), p. 116 at 163-166.
- Exhibit 314** Yearbook of the International Law Commission, 1952, Vol. I, pp. 172-173, 177-178, 188-190.
- Exhibit 315** Francois, *Addendum to the Second*

Report of the Regime of the Territorial Sea, U.N. Doc. A/CN.4/61/Add.1 (18 May 1953).

- Exhibit 316** Yearbook of the International Law Commission, 1954, Vol. I, pp. 65, 9094, Vol. II, pp. 155-156.
- Exhibit 317** Yearbook of the International Law Commission, 1956, Vol. I pp. 73-74, 205-216, 219-221, Vol. II, pp. 36-38.
- Exhibit 318** Yearbook of the International Law Commission, 1956, Vol. I pp. 190-193, Vol. II, pp. 268-270.
- Exhibit 319** United Nations Conference on the Law of the Sea, Official Records, Vol. III, A CONF. 13/39, 1958, pp. 144-146, 161-162, Annexes pp. 227-228, 240-242.
- Exhibit 320** Status of Ratification of 1958 Convention on the Territorial Sea, 89 Cong. Rec. Part 3 (1965), pp. 10312-10313.
- Exhibit 321** S. 1954, a bill to protect coastal fishery and other resources by implementing the Convention on the Territorial Sea and the Contiguous Zone, 89th Cong., 1st sess., May 12, 1965.
- Exhibit 322** Judgment, North Sea Continental Shelf, I.C.J. Reports, 1969, pp. 33-36.
- Exhibit 323** Letter, March 1, 1966, to Archibald Cox, Special Assistant to the U.S. Attorney General, from Paul M. Hebert,

Special Counsel to the Attorney General of Louisiana, re April 1961 Memorandum of the U.S. Coast and Geodetic Survey Presenting Recommendations on Delineation of Louisiana Coastline. Source: U.S. Department of Justice.

Exhibit 324 Letter, March 4, 1966, to Paul M. Hebert from Archibald Cox, in response to Mr. Hebert's letter of March 1, 1966. Source: U. S. Department of Justice.

Exhibit 325 Letter, March 16, 1966, to Paul M. Hebert from Archibald Cox. Source: U.S. Department of Justice.

Exhibit 326 Letter March 22, 1966, to Paul M. Hebert from George S. Swarth, Attorney, Land and Natural Resources Division, U.S. Department of Justice, transmitting Accession No. 62512 subject to terms of March 16, 1966 letter. Source: U.S. Department of Justice.

Exhibit 327 Letter, March 28, 1966, to Dean Paul M. Hebert from Archibald Cox acknowledging his letter of March 22, 1966. Source: U.S. Department of Justice.

Exhibit 328 1. Certification dated December 17, 1970, by Nancy E. Pearl, Consul of the United States of America, certifying annexed copy of Note No. 1639 of December 2, 1970,

is a true copy of the copy filed in that Embassy.

2. Certified copy of Note No. 1639 dated December 2, 1970, with enclosed letter, dated November 10, 1970, to John R. Stevenson, the Legal Adviser of the Department of State, from Shiro Kashiwa, Assistant Attorney General, U.S. Department of Justice.

Exhibit 329

1. Certification dated December 17, 1970, by Nancy E. Pearl, Consul of the United States, certifying annexed copy of Note No. 513158 of December 16, 1970, is true copy of original.
2. Certified copy of Note No. 513158 of December 16, 1970.

Exhibit 330

Department of State Translation of Note No. 513158.

Exhibit 331

Letter, November 20, 1970, to Shiro Kashiwa, from John R. Stevenson. Source: U.S. Department of Justice.

Exhibit 332

1. Letter, December 10, 1970, from Frederick Ellis to Peter Strauss, transmitting Louisiana Answers to U.S. Second Formal Interrogatories to the State of Louisiana.
2. To answers to U.S. Second Formal Interrogatories to the State of Louisiana.

Exhibit 333

Shirley and Ragsdale, eds., *Deltas in*

Their Geologic Framework (Houston Geological Society) pp. 232-251.

- Exhibit 334** United States Tariff Commission Maps prepared for the purpose of facilitating the conduct of an investigation under S. Res. 314, 71st Cong., 2d Sess. (1930).
- Exhibit 335** Act No. 145, Louisiana Acts, 1942, pp. 483-495.
- Exhibit 336** Act No. 385, Louisiana Acts, 1948, pp. 1040-1048.
- Exhibit 337** Act No. 386, Louisiana Acts, 1948, pp. 1049-1071.
- Exhibit 338** Portion of U.S.C. & G.S. Chart Number 1272, all editions and revised editions from the 9th revised edition. March 28, 1949, through the 25th edition, August 15, 1970.
- Exhibit 339** Documents relating to establishment and discontinuance of navigational aids at Pass Tante Phine by Shell Oil Co., Files, U.S. Coast Guard, Eighth District, New Orleans, Louisiana.
- Exhibit 340** Naval Oceanographic Office, Weekly Notice to Mariners, 44/62 and 34/66.
- Exhibit 341** Letter from Philip B. Perlman, Solicitor General, to Bolivar E. Kemp, Jr., Attorney General of Louisiana, March 16, 1951, Department of Justice.

- Exhibit 342** *Louisiana v. Dardar*, Opinion, November 8, 1970, Clerk of the Supreme Court of Louisiana.
- Exhibit 343** Procedures for the Creation of a Boundary for the Maritime Zone Between Mexico and the United States in the Gulf of Mexico, Department of State.
- Exhibit 344** Commander R. L. Swanson, National Oceanic and Atmospheric Administration, Report on Tidal Data Mississippi River Delta Mapping Program, (December 1970).
- Exhibit 345** Data prepared by Mr. Meade, Chief, Triangulations Branch, Geodesy Division NOS, NOAA.
- Exhibit 346** Wind and Weather Conditions in the Mississippi River Delta Regions, Supplemental Report, December 17, 1970, prepared by Arthur I. Cooperman.
- Exhibit 347** Map of a Military Reconnaissance and Survey of the approaches to New Orleans from the Gulf of Mexico between the Mississippi and Atchafalaya Rivers. Made under the direction of Capt. Geo. W. Hughes (1842).
- Exhibit 348** Chart of the Gulf of Mexico and Windward Passages including the Islands of Cuba, Haiti, Jamaica, Puerto Rico, and the Bahamas. Compiled principally from the Surveys made by order of the British, Spanish, and United States Governments.

Published by James Imray and Son.
(1865).

- Exhibit 349** Measurement of the area between North Pass and Dead Women Pass (Bucket Bend Bay).
- Exhibit 350** Measurement of the areas adjacent to Pass a Loutre, Southeast Pass, and South Pass.
- Exhibit 351** East Bay Closing Lines illustrating the application of the Boggs formula to the closing lines described in Louisiana Exhibit 23A.
- Exhibit 352** East Bay Closing Lines illustrating the application of the Boggs formula to the closing lines described in Louisiana Exhibit 197.
- Exhibit 353** East Bay Closing Lines illustrating the application of the Boggs formula to the closing lines described in Louisiana Exhibit 180.
- Exhibit 354** Measurement of the Caminada-Barataria Bay area.
- Exhibit 355** Measurement of the Caillou Bay area.
- Exhibit 355A** Replacement for U.S. Exhibit No. 355 (measurement of Caillou Bay area), with corrected bar scale.
- Exhibit 356** Measurement of the Point au Fer and Shell Keys area.
- Exhibit 357** Certified copy of a portion of U.S.C. & G.S. Chart No. 1272, 9th ed., re-

vised May 18, 1953, showing East Bay.

Exhibit 358 Certified copy of a portion of U.S.C. & G.S. Chart No. 1272, 9th ed., revised July 26, 1954, showing East Bay.

Exhibit 359 Certified copy of a portion of "Map of a Military Reconnaissance and Survey of the Approaches to New Orleans from the Gulf of Mexico between the Mississippi and Atchafalaya Rivers. Made under the direction of Capt. Geo. W. Hughes (1842)," showing Caillou Boca.

Exhibit 360 Certified copy of "Map of a Military Reconnaissance and Survey of the Approaches to New Orleans from the Gulf of Mexico between the Mississippi and Atchafalaya Rivers. Made under the direction of Capt. Geo. W. Hughes (1842)."

Exhibit 361 Composite of U.S.C. & G.S. Chart No. 1116, 22d ed., May 16, 1970, and part of U.S.C. & G.S. Chart No. 1115, ed. July 4, 1970.

Exhibit 362 U.S.C. & G.S. Chart No. 1273, 25th ed., August 15, 1970.

Exhibit 363 U.S.C. & G.S. Chart No. 1273, 12th ed., August 15, 1970.

Exhibit 364 U.S.C. & G.S. Chart No. 1050, 11th ed., October 3, 1970.

Exhibit 365 Certified copy of letter dated April

30, 1962, to Archibald Cox, Solicitor General and Attorney General Jack P. F. Gremillion of Louisiana, from appointed Members of the Joint Committee, Messrs. Swarth, Clement, Gumm, Atwater, Hayne, and Wilkinson, submitting its report.

- Exhibit 366** Certified copy of a letter dated October 27, 1961, to Solicitor General Archibald Cox from Jack P. F. Gremillion, Attorney General of Louisiana, enclosing recent news article and press release issued thereafter.
- Exhibit 367** Affidavit of Donald J. Simon, January 6, 1971.
- Exhibit 368** Copy of part of Map 8 of 8, marked by James F. Richardson to show location of Shell Oil Co. navigational buoys at Pass Tante Phine.
- Exhibit 369** Copy of part of U.S.C. & G.S. Chart No. 1272 (9/17/56) showing location of areas designated "6", "7", and "8" in East Bay and at South Pass.
- Exhibit 370** Copy of parts of Maps 4 and 5 of 8, showing location of areas designated "6", "7", and "8" in East Bay and at South Pass.
- Exhibit 371** Copy of part of U.S.C. & G.S. Chart No. 1272 (9/17/56) showing location of areas designated "3" and "9" near Pass du Bois and Tiger Pass.

- Exhibit 372** Copy of parts of Maps 7 and 8 of 8, showing location of areas designated "3" and "9" near Pass du Bois and Tiger Pass.
- Exhibit 373** Copy of part of U.S.C. & G.S. Hydrographic Survey No. 5824, January - May, 1935, showing Point au Fer and nearby shell reefs.
- Exhibit 374** Set of 54 maps accompanying the Report of the Determination of the Contact Line of Mean Low Water of the Gulf of Mexico with the Mainland and Adjacent Islands of the State of Louisiana, dated December 20, 1961, submitted by committees appointed for that purpose. ("Committee Maps," designated 1 through 41 of 41, 1 through 8 of 8, and 1 through 5 of 5.)
- Exhibit 375** Copy of parts of Maps 7 and 8 of 8 (vicinity of Pass du Bois and Tiger Pass).
- Exhibit 376** List of publications by Dr. Charles R. Kolb.
- Exhibit 377A** Black-and-white copy of Tariff Commission map, on base U.S.C. & G.S. Chart No. 1115, for use in Customs District 19-20.
- Exhibit 377B** Black-and-white copy of Tariff Commission map, on base U.S.C. & G.S. Chart No. 1116, for use in Customs District 19-20.

- Exhibit 378** List of publications by Dr. Roger T. Saucier.
- Exhibit 379** Reduced scale, black-and-white composite of Committee Maps, Point au Fer to Shell Keys.
- Exhibit 380** List of birdfoot deltas.
- Exhibit 381** List of publications by Mr. Buford K. Meade.
- Exhibit 382** Copy of page 107, League of Nations Acts of the Conference for the Codification of International Law (1930): Meetings of the Committees, Vol. III, Minutes of the Second Committee: Territorial Waters (L.N. Doc. No. C.351 (b). M. 145 (b). 1930.V.)
- Exhibit 383** Copy of Document No. 19, League of Nations Conference for the Codification of International Law (1930).
- Exhibit 384** United States coastline description, revised January 25, 1971.
- Exhibit 385** U.S.C. & G.S. Chart No. 1274, June 6, 1970, revised through Notice to Mariners 23/70 (mounted).
- Exhibit 386** U.S.C. & G.S. Chart No. 1275, June 27, 1970, revised through Notice to Mariners 26/70 (mounted).
- Exhibit 387** U.S.C. & G.S. Chart No. 1276, February 14, 1970, revised through Notice to Mariners 7/70 (mounted).
- Exhibit 388** U.S.C. & G.S. Chart No. 1277, July

- 4, 1970, revised through Notice to Mariners 27/70.
- Exhibit 389** Set of 54 Committee Maps, at reduced scale, showing the United States coastline contention.
- Exhibit 389A** Three mile arc templates to accompany U.S. Exhibit 389.
- Exhibit 390** Louisiana's Response to the United States Fifth Formal Request for Admissions.
- Exhibit 391** Louisiana's Response to the United States Sixth Formal Request for Admissions.
- Exhibit 392** Louisiana's Response to the United States Third Formal Interrogatories.
- Exhibit 393** Sketch by Dr. Robert D. Hodgson, illustrating the 45° test for headlands.
- Exhibit 394** Sketch illustrating alternative inner and outer headlands.
- Exhibit 395** Sketch illustrating rounded headlands and a circular bay.
- Exhibit 396** Sketch by Dr. Robert D. Hodgson illustrating application of the 45° test.
- Exhibit 397** Sketch of a headland not associated with a bay.
- Exhibit 398** Sketch by Dr. Robert D. Hodgson, illustrating selection of the entrance point on a rounded headland by use

of the bisector of the angle between lines projecting the general trend of the coast and the general trend of the water line of the indentation.

- Exhibit 399** Sketch by Dr. Robert D. Hodgson, illustrating use of a 3-mile arc to ascertain shore points that affect the 3-mile limit.
- Exhibit 400** Sketch illustrating treatment of an island as essentially mainland.
- Exhibit 401** Sketch illustrating how differences in the shoreline affect the propriety of drawing closing lines to an island.
- Exhibit 402** Sketch illustrating the effect of screening islands in reducing the area of inland waters in a bay.

BATON ROUGE HEARING

- Exhibit 403** U.S. & G.S. Chart 5107, 30th ed. April 11, 1970, corrected thru NM 15/70. (With penciled closing line and application of the Boggs formula.)
- Exhibit 404** Sketch of a nearly circular bay.
- Exhibit 405** Sketch of a slight coastal curvature.
- Exhibit 406** Sketch of a 90-degree coastal turn.
- Exhibit 407** Sketch of a stair step coastal turn.
- Exhibit 408** Sketch of a bay with double headlands.
- Exhibit 409** Sketch of a bay with a remote coastal angle.

- Exhibit 410** Sketch of a bay with a remote coastal angle.
- Exhibit 411** Sketch by David Morgan of application of the semicircle test to a deep bay.
- Exhibit 412** Sketch by David Morgan of an indentation that does not meet the semicircle test.
- Exhibit 413** Sketch of closing lines in an interior indentation in a coastal curvature.
- Exhibit 414** Sketch of small and large promontories.
- Exhibit 415** Sketch of Louisiana Exhibit 338 at actual reduced scale.
- Exhibit 416A** Letter of April 27, 1971 from the Geographer of the Department of State to the First Secretary of the Embassy of the Federal Republic of Germany transmitting a set of 155 charts showing the provisional baseline territorial sea and contiguous zone of the United States.
- Exhibit 416B** A similar letter to Mr. E. John Cooper, Territorial Waters Office, Department of Fisheries and Forests, Dominion of Canada.
- Exhibit 416C** A similar letter to Mr. R. J. Fisher, President, Pickford and Black, Ltd. Halifax Canada, with a notation that copy was sent to Mr. Andrzej Wojtowicz.

- Exhibit 416D** A set of 155 maps showing the limit of the territorial sea and contiguous zone of the United States and the limit of inland waters where needed for delimitation of those lines.
- Exhibit 417** Deposition of Commander R. Lawrence Swanson.
- Exhibit 418** Inked drawing used in conjunction with Comm. Swanson's deposition.
- Exhibit 419A** Chart No. 8 of series of charts of Norwegian coast contained in Annex 35 of the reply of the United Kingdom in the Anglo-Norwegian Fisheries Case.
- Exhibit 419B** Chart No. 9 of same as above (Norwegian maps).

No. 9, Original

In the
Supreme Court of the United States

OCTOBER TERM, 1974

UNITED STATES OF AMERICA,
Plaintiff,

v.

STATE OF LOUISIANA, ET AL.,
Defendants.

APPENDIX III
CLOSING LINE CONTENTIONS OF THE STATE
OF LOUISIANA INCLUDING POINT TO POINT
DESCRIPTION

MISSISSIPPI RIVER DELTA

By straight lines:

	X	Y
Beginning at	2742583	353754
through	2737288	345654
through	2755325	204680
through	2755178	203815
through	2754925	203475
through	2754100	186915
through	2754263	186316
through	2753885	183460
through	2752470	182170
through	2751045	181305
through	2726105	148530
through	2724850	148150
through	2702461	124148
through	2701735	123905
through	2701255	124130
through	2701003	121725
through	2701237	120486
through	2701773	118961
through	2701672	118777
through	2701421	118995
through	2701221	118945
through	2701104	118141
through	2700970	117990
through	2700786	117889
through	2700535	117889
through	2699658	116782
through	2698997	117204
through	2697850	117200
through	2609180	91445
through	2607290	93040
through	2590100	203860

217

through	2589100	204125
through	2587400	205250
ending at	2585000	206975

CAILLOU BAY

By straight lines:

	X	Y
Beginning at	2164477	134753
through	2162430	135112
through	2157920	135521
through	2148929	136962
through	2147751	136599
through	2143589	136276
through	2139529	136276
through	2138231	136387
through	2134210	136726
through	2133089	136940
through	2128819	138694
through	2126697	139353
through	2122523	140238
through	2118829	141971
through	2118065	142532
through	2117317	143491
ending at	2076201	189799

SHELL KEYS

By straight lines:

	X	Y
Beginning at	1845475	293595
through	1846296	293267
through	1846637	292250
through	1845817	292053
through	1845331	290564
through	1845187	289107

through	1845935	287020
through	1845633	283208
through	1844412	280498
through	1844320	278858
through	1843467	275912
through	1839563	275511
through	1838067	274547
through	1837076	273569
through	1835344	270839
through	1834019	270301
through	1833527	271423
through	1833815	273018
through	1833822	274343
through	1833848	275957
through	1834163	276830
through	1835948	277559
through	1836138	278838
through	1835397	281476
through	1833612	283982
through	1833782	284744
through	1835738	286620
through	1835246	287834
through	1833763	290104
through	1833231	292919
through	1834432	294953
through	1835042	296456
ending at	1835502	296712

SPECIFIC DISPUTED SECTOR DESCRIPTIONS

1. In the Mississippi Delta area described in issue A-1 from Errol Shoal to the western headland of Sandy Point Bay. If Louisiana's historic waters (including historic straight baseline claims) are not accepted by the Court, the coast line description would be as contended in U. S. Exh. 389, proceeding from the north until the first alternative claim sector is reached at Dead Women Pass (Bucket Bend Bay).

The Statement of Issues includes some specific issues relating to geomorphic contentions for particular sectors within the Mississippi Delta. Descriptions of the primary geomorphic claims for these sectors are listed below in the same order as the Statement of Issues. Where secondary alternative claims have been urged by Louisiana, they are also given.

2. From Dead Women Pass to North Pass. The primary Louisiana closing line (baseline) claimed here, if more outward historic waters claims are not accepted, is a closing line from $X = 2,708,835$, $Y = 221,440$ to $X = 2,738,320$ to $Y = 210,230$. Alternatively, if U. S. Exh. 416-D has any effect, Louisiana should also benefit from the additional coast line claims and three-mile projections recognized as proper in that exhibit in the vicinity of Dead Women Pass, using banks of canals or streams used as arc points but for which no coordinates are plotted on the chart in U. S. Exh. 416-D. This alternative is not intended to waive Louisiana's objection to U. S. Exh. 416-D and is by way of rebuttal only. If the coordinate

at $X = 2,738,320$, $Y = 210,230$ is not accepted as the eastern natural entrance point of Bucket Bend Bay, then in that event it should serve as an arc point and the next more inward island would certainly be, as a minimum, the suitable natural entrance point. The resultant closing line would be $X = 2,708,835$, $Y = 221,440$ to $X = 2,737,065$, $Y = 210,155$. Even if it is found that neither of the low-water elevations along the north natural levee of North Pass constitutes the natural entrance point, they are arc points and the more outward point of the technical mainland of the natural levee of North Pass found at $X = 2,736,820$, $Y = 209,000$ would justify a closing line from $X = 2,708,835$, $Y = 221,440$ to $X = 2,736,820$, $Y = 209,000$.

The enormous extent of uncounted water area of tributary water bodies within Bucket Bend Bay makes clear passage of the semicircle test obvious for whatever line might be chosen, especially given intertributary subsidence trends.

3. Pass a Loutre to Southeast Pass area, including Blind Bay. The alternative claim of Louisiana in the sector of the third group of issues from Pass a Loutre to Southeast Pass under Louisiana's primary geomorphic position is a Lambert Grid coordinate description as shown below.

Here the historic inland water claim of *The Anna*, reinforced by practices of state and federal officials, and also that case's significance juridically in regard to treating mudlumps as part of the mainland, come into focus, with the description of a line extending from the

first coordinate shown below to and around the other coordinates given.

Call	X	Y
From	2,738,935	209,950
through	2,747,065	206,635
through	2,750,755	206,535
through	2,752,010	205,475
through	2,755,325	204,680
through	2,755,178	203,815
through	2,754,925	203,475
through	2,754,100	189,915
through	2,754,263	186,316
through	2,753,885	183,460
through	2,752,470	182,170
through	2,751,045	181,305
through	2,726,105	148,530
to	2,724,850	148,150

Even if Louisiana's contentions that the outermost mudlumps form natural extensions of the mainland levees and as such, natural entrance points of the inner distributary enbayments are rejected, natural entrance points of the embayments bounded by the mudlump groupings at Pass a Loutre and Southeast Pass that are more seaward than the federal contentions may be selected on more inward islands or even on the mainland. For example, if the southeast headland of the indentation between Pass a Loutre and Southeast Pass mouth is found not to be the small mudlump at $X = 2,726,105$, $Y = 148,530$ by reason of any government arguments, then certainly the substantially larger mudlump island at $X = 2,725,730$, $Y = 149,795$ would be appropriate as the natural entrance point.

4. From Southeast Pass to South Pass including Garden Island and Redfish Bays. The primary alternative description line here is from $X = 2,724,850$, $Y = 148,150$, to $X = 2,702,461$, $Y = 124,148$. Because of its relevance in emphasizing the interrelationship between historic waters and geomorphic alternative arguments here, we point out that this is the very sector in which "claim was given under the direction of the American ambassador . . . for territory of the United States." *The Anna* 5 C Rob. 373. This claim of territory should be understood as generally a claim of territory around the mudlump islands at the mouth of the Mississippi and not strictly limited to the precise situs of the incident involving vessels no more than Chesapeake Bay or Delaware Bay were limited as historic bays to the precise situs of the incidents that gave rise to the claims to those bays. Thus, in effect, the historic waters description based on the claim of *The Anna* should be interpreted as extending around all of the mudlumps but additionally, *The Anna* and the Supreme Court's rulings furnish legal precedent for standards for ascertaining extension of the mainland issues, for selecting the closing line of an unchallenged bay. On the latter issues, if it is not deemed appropriate to use the outermost mudlump at Southeast Pass, a more inward point for the closing line seaward of the federal admission may be used.

5. South Pass. The description Louisiana contends should be employed in this sector is:

	X	Y
From	2,702,461	124,148

through	2,701,735	123,905
through	2,701,255	124,130
through	2,701,003	121,725
through	2,701,237	120,486
through	2,701,773	118,961
through	2,701,672	118,777
through	2,701,421	118,995
through	2,701,221	118,945
through	2,701,104	118,141
through	2,700,970	117,990
through	2,700,786	117,889
through	2,700,535	117,889
through	2,699,658	116,782
through	2,698,997	117,204
to	2,697,850	117,200

If Louisiana's contentions on the extensions of additional mudlump islands that were not recognized in the 1959 low-water survey are not accepted, nonetheless, the additional mudlumps for certain time periods are recognized by the federal government. See description connected with what is styled "a newly formed mudlump" shown on Exh. 200 discussed at page 107 of the federal brief before the Master. The federal government had incorrectly argued

Louisiana proposes a series of straight lines between offshore points which are not indicated as being on islands or low-tide elevations

This erroneous argument was based on an illustration which did not show the islands, because it was a summary of the lines, not the land points. The islands were not shown on that map but proven by photographs and shown on official charts until removed at the direction of counsel. We point out that *The Anna* also supports

an historic claim around mudlumps in this area, as the nature of the broad claim asserted by the American ambassador was to the areas enclosed by mudlumps. In any event, the United States agrees that the lumps should serve as arc points, as is true with all island-headland closures asserted by Louisiana, *supra*, even if closing lines are not recognized. (See three-mile projections made by the federal government off Southeast Pass on U.S. Exh. 416-D).

6. From South Pass to Southwest Pass—East Bay.

Louisiana's historic inland waters in East Bay lie within a closing line extending from $X = 2,697,850$, $Y = 117,200$ to $X = 2,609,180$, $Y = 91,445$.

The next more inward possible closing line is the primary Louisiana juridical contention: Closing line A of La. Exh. 197 and 197A which extends from $X = 2,697,850$, $Y = 117,200$ to $X = 2,624,995$, $Y = 108,700$. If the Court determines that area measurement Method 3 (the Article 7 system of using islands and tributaries) is correct, then this closing line should be employed even to the present. Prior to the September 17, 1956 chart revision, line A satisfied Method 1 area measurement, so if Method 1 is the only approved method, still Line A should be employed for the accounting covering the period June 5, 1950 until the revision of Chart 1272 dated September 17, 1956.

Closing line B, La. Exh. 197, extending from $X = 2,685,325$, $Y = 133,800$ to $X = 2,644,940$, $Y = 134,910$ (slightly different if 1970 changes are employed, see La. Exh. 197) would be employed after

September 17, 1956 if Method 3 area measurement were rejected and Method 2 accepted.

Closing line B' would be appropriate for the period since September 17, 1956 if a more outward line is not approved and even if Methods 3 and 2 of area measurement are rejected. It satisfied the Method 1 semi-circle test. It is slightly more seaward than line C' or line C because it employs as its eastern headland not the inner tip of Cowhorn Island but the outermost natural entrance point on Cowhorn Island, selected by the bisector of the angle method. Thus, its use depends on approval of that headland selection method for the point shown on Figure 13 of Louisiana's *Brief in Support of the Exceptions to the Report of the Special Master filed July 31, 1974*. Thus, the eastern headland is situated at approximately latitude $29^{\circ}00'45''\text{N}$, longitude $89^{\circ}11'30''\text{W}$. Its western headland, if the 1959 low-water survey is employed, is found at $X = 2,644,940$, $Y = 134,910$. If the charts are employed, its western headland is the tip of the spit paralleling Southwest Pass at approximately latitude $29^{\circ}00'48''\text{N}$, longitude $89^{\circ}19'24''\text{W}$, shown on the September 17, 1956 and September 17, 1962 editions of Chart 1272.

Closing line C' is appropriate if a more outward line is not used and even if Methods 3 and 2 are rejected. It would be appropriate for the time period commencing with the August 15, 1970 revision of Chart 1272 to the present, if it is decided to recognize the August 15, 1970 chart revision along Southwest Pass, but not to give it effect as to Cowhorn Island

because of inadequacy of the post-hurricane survey work to disprove its continued existence. It would run from the innermost tip of Cowhorn Island, $X = 2,677,650$, $Y = 138,050$ to a point of land at approximately latitude $29^{\circ}00'22''N$, longitude $89^{\circ}19'51''W$ as may be located on the August 15, 1970 edition of Chart 1272. See Figure 12 of Louisiana's *Brief in Support of the Exceptions to the Report of the Special Master filed July 31, 1974*.

Closing line C, La. Exh. 197, extending from $X = 2,677,650$, $Y = 138,050$, to $X = 2,644,940$, $Y = 134,910$, recognized by the Special Master, Report at 34, satisfied even Method 1 and should be utilized if the more outward closing lines are rejected. Its existence should be recognized for the period Cowhorn Island's existence is recognized, as it uses the innermost tip of Cowhorn Island as a headland. It employs as a base map a composite of the Set of 54 Maps as shown in La. Exh. 197, and uses the 1959 low-water survey, which surveyed the shore of East Bay as it existed in November 1959. Line C, prior to the 1959 low-water survey, existed more seawardly, due to the shorter length of the spit which parallels Southwest Pass. Therefore, for the period prior to 1959, if a more seaward line is not recognized, line C's location would be as shown and claimed on the September 17, 1956 chart overlay in La. Exh. 180, with a western headland which is the same as B' line at approximate latitude $29^{\circ}00'48''N$, longitude $89^{\circ}19'24''W$.

Closing line D, La. Exh. 197, extending from

$X = 2,672,315$, $Y = 141,745$ to $X = 2,644,940$, $Y = 134,910$ must be employed in the absence of the application of a more outward closing line.

7. From Southwest Pass to Belle Pass: Ascension—Caminada—Barataria Bay complex. Ascension Bay is an overlarge bay within the meaning of the Convention and Louisiana draws a 24-mile fallback line within it from Empire Canal to a point west of Caminada Pass, i.e. from $X = 2,550,402$, $Y = 216,158$ to $X = 2,406,890$, $Y = 189,733$. With this determination, the Master concurs. See Report at 46.

The areas covered by issues 8-10 of the Statement of Issues, reprinted as Appendix A-1 of the Master's Report, involve either uncontroverted matters or minor disputes concerning survey or chart questions, plus bayou or small bay mouth issues. Some of these issues are moot under the Master's Ascension Bay findings. Louisiana has taken exception only to the survey or chart questions treated in paragraphs (c) through (e), Report at 47. These pertain to the period of existence of certain low-water lines. Louisiana maintains that the low-water lines of paragraphs (c) through (e) should be recognized even to the present and used as base points for the application of the ruling in paragraph (b), Report at 47, calling for use of the low-water line.

11. Caillou Bay. Commencing at $X = 2,164,477$, $Y = 134,753$ and proceeding westerly, the historic waters closing line descriptions given *supra* accords

with Louisiana's juridical-geomorphic bay description. Upon a finding that the Special Master too-narrowly construed his authority in the area of Caillou Bay, the closing line found by the Special Master after a full evidentiary hearing, Report at 51, should be employed.

12. Atchafalaya Bay. As shown on La. Exh. 194, the closing line here should be from $X = 1,987,371$, $Y = 241,272$ to $X = 1,855,055$, $Y = 296,154$, but as found by the Master, Report at 52, more outward points on islands or low-water elevations should be given effect as arc points under prior decisions of the Court, 409 U.S. 17.

