

**UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT**

HEALTHY GULF, HABITAT
RECOVERY PROJECT, CENTER FOR
BIOLOGICAL DIVERSITY, SIERRA
CLUB, and TURTLE ISLAND
RESTORATION NETWORK,

Petitioners,

v.

U.S. DEPARTMENT OF THE
INTERIOR; DOUG BURGUM, in his
official capacity as Secretary of the
Interior; BUREAU OF OCEAN
ENERGY MANAGEMENT; and
MATTHEW GIACONA, in his official
capacity as Director of the Bureau of
Ocean Energy Management,

Respondents.

Case No.

PETITION FOR REVIEW

Healthy Gulf, Habitat Recovery Project, Center for Biological Diversity, Sierra Club, and Turtle Island Restoration Network petition this Court to review the Department of Interior and Bureau of Ocean Energy Management's approval of BP Exploration & Production Inc.'s Development Operations Coordination Document for the Kaskida Project. In accordance with Eleventh Circuit Rule 15-2,

a copy of the approval letter is attached as Exhibit A. The Site-Specific Environmental Assessment for the Project is part of the administrative record that will be filed in this case.

The Court should grant the petition because the Approval is arbitrary, capricious, and not in accordance with law.

Dated this 20th day of April, 2026.

/s/ Brettmy Hardy

Brettmy Hardy
EARTHJUSTICE
180 Steuart St. #194330
San Francisco, CA 94105
415-217-2000 Telephone
415-217-2040 Fax
bhardy@earthjustice.org

Rumela Roy
EARTHJUSTICE
633 17th Street, Suite 1600
Denver, CO 80202
303-623-9466 Telephone
415-217-2040 Fax
rroy@earthjustice.org

*Attorneys for Healthy Gulf, Habitat
Recovery Project, Center for Biological
Diversity, Sierra Club, and Turtle Island
Restoration Network*

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of April, 2026, a true and correct copy of the foregoing document was sent out via Certified Mail/Return Receipt

Requested for service on the following:

U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Doug Burgum, Secretary of the Interior
Department of the Interior
1849 C Street, NW
Washington, DC 20240

Bureau of Ocean Energy Management
1849 C St., NW
Washington, DC 20240

Matthew Giacona, Director of the
Bureau of Ocean Energy Management
Bureau of Ocean Energy Management
1849 C St., NW
Washington, DC 20240

Todd Blanche, Acting Attorney
General
US Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530-0001

DATED: 4/20/2026

s/ Brettny Hardy
Brettny Hardy