

August 12, 2025

Via email to: sandra.g.gainey@usace.army.mil and darrell.barbara@usace.army.mil Gail Gainey, Jurisdiction and Enforcement Chief

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Via email to: <u>Casandra.Parker@LA.gov</u> and <u>melissa.sherman@la.gov</u> Casandra Parker, Inspection and Enforcement Section Manager Melissa Sherman, Office of Coastal Management Analyst Louisiana Department of Energy and Natural Resources (LDENR) 617 N. Third Street, 10th Floor, Suite 1078 Baton Rouge, Louisiana 70802

Re: Request for Immediate Enforcement Action on Potential Violations of Clean Water Act ("CWA"), Rivers and Harbors Act, and Coastal Resources Management Act appearing related to MVN-2021-00560-WKK, P20211131, MVN-1997-03712-WQQ, MVN-1999-03712-WQQ, and/or P19990956.

Dear Enforcement and Permit Officers,

On behalf of For a Better Bayou, we request your agencies take immediate enforcement action, including to issue a Cease and Desist Order, require corrective measures, and take other appropriate action in response to the apparent unauthorized discharges of dredged materials into No Name Bayou and Calcasieu Lake, as well as the unlawful filling of No Name Bayou, at or near the Cameron Prairie National Wildlife Refuge-East Cove Unit (the "Refuge"). Specifically, discharges from one or more slurry pipelines are moving outside designated dredge placement area(s) (see Fig. 1), entering, filling, and preventing boat passage on No Name Bayou (see Figs 2 - 4), and discharging into Calcasieu Lake through No Name Weir (at approximately 29°50'17.4"N 93°19'14.3"W) when the weir is open. The Corps should order a stop to the discharges from the slurry pipe(s) and other measures to address the issue. Those measures should not include closure of the weir because closure of the weir further harms local fishermen.

These discharge and fill activities appear to be in conjunction with Venture Global CP2 LNG, LLC's CWA permit MVN-2021-00560-WKK and coastal use permit P20211131 for construction and operation of an LNG export terminal and/or the Cameron Parish Port,

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Harbor and Terminal District's (the "Port") CWA permits MVN-1997-03712-WQQ, MVN-1999-03712-WQQ and coastal use permit P19990956 for "Maintenance Dredging of the Calcasieu Loop Pass and Material Disposal in Cameron Parish." According to a local news article, Venture Global has acknowledged responsibility for "leaks" of dredged materials in the area: https://www.kplctv.com/2025/08/09/dredging-accident-cameron-parish-leaves-fishermen-angry-with-questions/. The article shows some of the apparent unauthorized discharges and describes some of the related harm to local fishermen, including from closure of No Name Weir. On information and belief, the discharges began as early as July 24, 2025, *i.e.* earlier than reported in the article.

Additional detail about the activities and discharges follow: Venture Global's "Dredged Material Placement Overview Map," at *Figure 1*, from its application to LDENR for a coastal use permit (also to USACE for a CWA permit), shows planned placement of dredged material for several projects in the Refuge, including dredged material from Venture Global's CP2 LNG terminal project and the Port's Calcasieu Loop Pass maintenance dredging. The delineated dredge placement area(s) corresponds with the area where one or more slurry pipeline(s) are or have been discharging dredged material in the area. On information and belief and consistent with the map in *Figure 1*, no permit allows discharges into or filling of No Name Bayou itself or Calcasieu Lake.

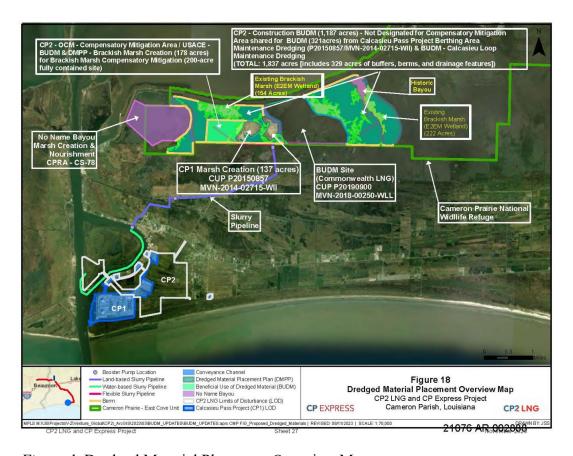


Figure 1, Dredged Material Placement Overview Map.

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The following images from the first week of August 2025, show brown dredged material discharged into the Refuge that has further discharged into and is partially filling No Name Bayou near the No Name Weir (*Figs. 2, 3 & 4*):



Figure 2, looking ENE, discharged dredged material in the Refuge; No Name Bayou (near the No Name Weir) can be seen partially filled alongside vegetated barrier between the bayou and Calcasieu Lake (lower left side).



Figure 3, looking ESE, dredged material discharges in and partial fill of No Name Bayou (lower side) near the No Name Weir; Calcasieu Lake visible in upper left quadrant.



Figure 4, looking West, dredged material filling No Name Bayou near the No Name Weir. The weir can be seen in the upper left corner of the image.

We request the Corps and LDENR to act immediately to 1) inspect the site, 2) issue cease and desist orders to prevent unauthorized discharges into waters of the United States from taking place, 3) require corrective measures, and 4) investigate and take other action in response to the apparent unlawful discharges, including civil penalties, as your agency deems appropriate.

Thank you for considering and responding to our concerns. We would appreciate you informing us of your response to this important matter as soon as possible. Also, please provide us with notice of any related permitting matters, *e.g.* for restoration. I can be reached at the email and phone number below.

Sincerely,

Elizabeth Livingston de Calderon

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