



United States Department of the Interior

BUREAU OF OCEAN ENERGY MANAGEMENT

New Orleans Office
1201 Elmwood Park Boulevard
New Orleans, LA 70123-2394

In Reply Refer To: Civil Penalty Case G-2024-029

September 11, 2025

GOM Shelf LLC
c/o Jones Walker
201 St. Charles Avenue
New Orleans, LA 70170
Attn: Sarah Y. Dicharry

Dear Ms. Dicharry:

Your letter dated September 8, 2025, requesting GOM Shelf LLC's existing area-wide bond(s) on file be used as the bond for the penalty amount in Civil Penalty Cases G-2024-029 was received in our office on September 11, 2025.

We are unable to grant your request at this time.

Should you need further assistance, please contact me at boemgulffinancialassurance@boem.gov.

Sincerely,
BRIDGETTE DUPLANTIS Digitally signed by
BRIDGETTE DUPLANTIS Date: 2025.09.11
09:55:19 -05'00'

Bridgette Duplantis, Section Chief
Leasing and Financial Responsibility Section
Leasing and Plans

cc: Rusty Vincent (rusty.vincent@commodoreoffshore.com)
Sarah Dicharry (sdicharry@joneswalker.com)



Sarah Y. Dicharry
D: 504.582.8490
F: 504.589.8490
sdicharry@joneswalker.com

September 8, 2025

VIA FEDERAL EXPRESS

GOAR BOEM
Leasing & Responsibility Unit
1201 Elmwood Park Blvd.
MS 5422
New Orleans, LA 70123-2394
504-736-2803

Re: GOM Shelf LLC
Civil Penalty Case G-2024-029; OCS-G 25605 (HI A 341)

To whom it may concern:

Enclosed please find GOM Shelf LLC's Notice of Appeal of the Reviewing Officer's Final Decision in Civil Penalty Case Number G-2024-029, dated July 11, 2025. Pursuant to 30 C.F.R. § 250.1409(b)(2), GOM Shelf LLC hereby gives notice of its request that GOM Shelf LLC's existing area-wide bond on file with the Gulf of America OCS Region be used as the bond for the penalty amount in this appeal.

Sincerely,

Sarah Y. Dicharry
Attorney for GOM Shelf LLC

Enclosures

cc: U.S. Department of the Interior (*via Federal Express*)
Office of the Solicitor
Division of Mineral Resources
1849 C Street, N.W., MS 5358
Washington, D.C. 20240

U.S. Department of the Interior (*via Federal Express*)
Bureau of Safety and Environmental Enforcement
Gulf of America OCS Region
1201 Elmwood Park Boulevard
New Orleans, LA 70123-2394

Kathryn E. Schimmel (*via Email*)

RECEIVED

September 11, 2025

*Leasing & Financial
Responsibility Section*



Sarah Y. Dicharry
D: 504.582.8490
F: 504.589.8490
sdicharry@joneswalker.com

September 8, 2025

VIA FEDERAL EXPRESS

U.S. Department of the Interior
Bureau of Safety and Environmental Enforcement
Gulf of America OCS Region
1201 Elmwood Park Boulevard
New Orleans, LA 70123-2394

Attn: Mr. Sean Chryssoverges

Re: GOM Shelf LLC
OCS-G 25605; Civil Penalty Case G-2024-029

To Whom it May Concern:

Please find enclosed GOM Shelf LLC's Notice of Appeal of the Reviewing Officer's Final Decision in Civil Penalty Case Number G-2024-029, dated July 11, 2025.

Please contact me if you have any questions concerning this filing.

Sincerely,

A handwritten signature in blue ink that appears to read "Sarah Dicharry".

Sarah Y. Dicharry
Attorney for GOM Shelf LLC

Enclosures

cc: U.S. Department of Interior (*via* Federal Express and Bison File & Serve)
Office of the Solicitor
Division of Mineral Resources
1849 C Street, N.W., MS 5358
Washington, D.C. 20240

Interior Board of Land Appeals (*via* Bison File and Serve)

Kathryn E. Schimmel (*via* Email)

**UNITED STATES DEPARTMENT OF THE INTERIOR
BOARD OF LAND APPEALS**

GOM SHELF LLC

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*
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IBLA-2025-_____

NOTICE OF APPEAL

Pursuant to the pertinent regulations (see 30 C.F.R. § 250.1409, 30 C.F.R. Part 290, 43 C.F.R. Part 4), GOM Shelf LLC (“GOM Shelf”) hereby files this Notice of Appeal of the attached Reviewing Officer’s Final Decision (Civil Penalty Case No. G-2024-029; OCS-G 25605) dated July 11, 2025 (the “ROFD”), and issued by the Bureau of Safety and Environmental Enforcement (“BSEE”). Pursuant to 43 C.F.R. § 4.403(a)(1), a copy of the ROFD is attached as Exhibit A.

STATEMENT ON STANDING (43 C.F.R. § 4.403(a)(2))

On October 7, 2022, BSEE issued an Incident of Noncompliance (the “BSEE INC”) to GOM Shelf. Subsequently, BSEE issued a Notice of Proposed Civil Penalty to GOM Shelf in connection with the BSEE INC. Following a meeting between BSEE and GOM Shelf, BSEE issued the ROFD to GOM Shelf. The ROFD assesses a civil penalty against GOM Shelf (in the amount of \$27,176), as proposed in the above-referenced Notice of Proposed Civil Penalty. GOM Shelf is appealing the ROFD on the grounds that it is contrary to law and unsupported by the record (the basis for the appeal will be more fully addressed in a forthcoming Statement of Reasons). Because GOM Shelf is “adversely affected by” the ROFD, it has standing to appeal that decision under 43 C.F.R. § 4.402.

STATEMENT ON TIMELINESS OF APPEAL (43 C.F.R. § 4.403(a)(3))

The ROFD is dated July 11, 2025; GOM Shelf received it by email on the same date. Under BSEE’s regulations, an appeal to the IBLA of the ROFD is due within 60 days after receipt of the ROFD (30 C.F.R. §§ 250.1409(a), 290.3 (same)); the earliest possible receipt date is July 11, 2025

(GOM Shelf may have received a formal service copy of the ROFD after July 11, 2025). Therefore, GOM Shelf's appeal is timely under 43 C.F.R. § 4.403(c)(1) and 30 C.F.R. §§ 250.1409(a), 290.3.

In accordance with 30 C.F.R. § 290.4, the Pay.gov confirmation receipt reflecting payment of the processing fees for GOM Shelf's appeal of the July 11, 2025 decision is attached as Exhibit B. And, in accordance with 30 C.F.R. § 250.1409(b), correspondence to the BOEM's Gulf of America Leasing and Responsibility Unit concerning the appeal bond requirement (being transmitted contemporaneously) is attached as Exhibit C.

Respectfully submitted,

Sarah Dicharry

Sarah Y. Dicharry
Kathryn E. Schimmel
JONES WALKER LLP
201 St. Charles Avenue, Suite 5100
New Orleans, Louisiana 70170-5100
Telephone: 504-582-8490

Dated: September 8, 2025

Attorneys for GOM Shelf LLC

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing pleading was made in accordance with the applicable rules via Federal Express and Bison File & Serve on September 8, 2025.

Sarah Dicharry



United States Department of the Interior
BUREAU OF SAFETY AND ENVIRONMENTAL ENFORCEMENT
Gulf of America OCS Region
1201 Elmwood Park Boulevard
New Orleans, LA 70123-2394

EXHIBIT A

REVIEWING OFFICER'S FINAL DECISION

In Reply Refer To: GE 921C

July 11, 2025

Re: Civil Penalty Case: G-2024-029
Lease Number: OCS- G 25605
Lease Operator: GOM Shelf LLC
Area: High Island
Block: A341
Facility: Platform B

GOM Shelf LLC
C/O Commandore Offshore Operating
Attention: Jayson Hebert
4012 Ambassador Caffery Pkwy
Lafayette, LA 70503

Dear Mr. Hebert:

An inspection of GOM Shelf LLC's (GOM Shelf) Lease OCS- G 25605, High Island Area (HI), Block A341, Platform B on October 7, 2022, by Bureau of Safety and Environmental Enforcement (BSEE) Inspectors resulted in the issuance of a G-111 Incidence of Non-Compliance (INC) with a component shut-in (C) enforcement action to GOM Shelf for unsafe conditions on the facility that posed an immediate threat to personnel, the facility, and/or the environment. GOM Shelf was notified by a letter from this office, dated December 13, 2024, that the G-111 INC was referred for civil penalty review.

GOM Shelf requested a meeting with BSEE on February 21, 2025, to discuss the Notice of Proposed Civil Penalty (NPC) that was sent on January 22, 2025. A meeting was held on April 22, 2025. A Final Decision is being rendered based on the original case information and on the additional information presented by GOM Shelf. The Final Decision letter restates information from the NPC Assessment, summarizes BSEE's analysis of the additional information presented, and explains the final decision.

Violation:

BSEE issued a G-111 INC for a violation of 30 CFR 250.107(a). This regulation states: (a) You must protect health, safety, property, and the environment by: (1) Performing all operations in a safe and workmanlike manner; (2) Maintaining all equipment and work areas in a safe condition; (3) Utilizing recognized engineering practices that reduce risks to the lowest level practicable when conducting design, fabrication, installation, operation, inspection, repair, and maintenance activities; and (4) Complying with all lease, plan, and permit terms and conditions.”

NPC Rationale:

On October 7, 2022, BSEE Inspectors conducted an annual inspection of GOM Shelf's Lease OCS-G 25605, HI A341, Platform B. During the inspection, BSEE Inspectors discovered the lessee has failed to maintain all equipment and work areas in a safe condition to provide for the protection of the lease and associated facility.

The lessee has failed to mitigate visible evidence of corrosion throughout the platform in the following areas:

- The underside of the main deck,
- The handrails on the main deck and sign structure,
- The topside, underside, and hatch covers of the helideck,
- The boat landing,
- The jacket legs,
- Vessels throughout the platform,
- The main bracing support for the stairway providing helideck access,
- Multiple flanges and valves throughout the facility with severe corrosion, and
- Process piping and all associated equipment with severe corrosion.

The corrosion on the facility poses a threat of significant structural issues. The Level 1 Survey from 2019-2022 identifies the Platform Overall Coating Rating as a 'C' or a 'poor' coating rating. The 2022 Level 1 Survey for HI A341 B specifically highlights the helideck, main deck, top of jacket, and the boat landing having a 'C' or 'poor' protective coating rating.

Photographs taken by BSEE Inspectors show damage on the structural base of a walkway where metal grating was installed on top of corroded metal with open holes. The corrosion present on the boat landing shows a threat to individuals who may attempt to board the platform or use the boat landing when swinging off from a work boat. Furthermore, the corrosion on the handrails of the boat landing and areas going to and from the boat landing pose a threat to any personnel who applies pressure to the handrails who may be walking down towards the boat landing or the +12 deck. A handrail breaking off or becoming unsecure can cause injury or fatality to personnel. Another photo captured by BSEE Inspectors shows corrosion on the U-bolts holding the platform sign that is connected to a handrail on the main deck. This corrosion poses a threat of pollution if the sign and/or handrail were to break off and fall into the Gulf. As a result of the several areas of corrosion, the Inspectors issued a G-111 INC with a component shut-in (C) enforcement action.

Ensuring and maintaining the integrity of the platform is critical to protecting the safety of personnel, the facility, and environment. GOM Shelf's failure to maintain all equipment and work areas in a safe condition per 30 CFR 250.107 constituted an immediate threat to personnel, the facility, and/or the environment.

GOM Shelf's Supplemental Information and BSEE's Response:

GOM Shelf requested a meeting on February 21, 2025, to discuss the subject civil penalty case. The meeting was held on April 22, 2025. The following supplemental information was provided by GOM Shelf:

A. GOM Shelf believes that BSEE should consider more recent compliance history when determining to mitigate the proposed assessment. GOM Shelf stated that they changed their contract operator from QuarterNorth to Commodore, effective on January 1, 2023. GOM Shelf went on to say BSEE considered a compliance and INC history from 2020-2022 to determine the amount of the proposed civil penalty, and that a more recent compliance and INC history should be considered. GOM Shelf also stated that the INC was issued in October 2022, two years before the Notice of Proposed Civil Penalty (NPC) was issued.

a. BSEE acknowledges that GOM Shelf updated its contractor from QuarterNorth to Commodore after the INCs were issued. BSEE does not consider compliance history after INC issuance when reviewing cases for civil penalty assessment. Therefore, to ensure consistency when reviewing compliance history for any operator, BSEE is not considering compliance history after the INC issuance date in this case. The INC history and compliance history from 2020-2022 did not increase, nor mitigate, the proposed assessed amount for this case. BSEE acknowledges GOM Shelf received an NPC two years after the INC was written. While BSEE endeavors to assess civil penalties as quickly as it can, it is not required to do so on a timeframe shorter than the one that exists here.

B. GOM Shelf believes BSEE's consideration of "Associated Companies" when reviewing compliance history for civil penalty assessment is flawed and has no basis in regulation.

b. It is standard BSEE practice to include "Associated Companies" when reviewing compliance history from every operator. To ensure consistency in assessing civil penalty cases, "Associated Companies" were included when reviewing civil penalty history in this case as well. However, the compliance history reviewed for this case did not affect the proposed assessment amount. Referring to the OCSLA Civil Penalty Assessment Matrixes for 2024, the assessed amount for the Category A/ Enforcement Code C violation in this case is equivalent to the starting point for such violations. Therefore, the inclusion of "Associated Companies" in compliance history did not increase, nor mitigate, the proposed assessed amount for this case.

C. GOM Shelf believes BSEE's proposed civil penalty assessment in this case is significantly higher than penalties it has assessed in recent years for similar violations. GOM Shelf referenced the following civil penalty cases as proof of this claim: G-2021-034, G-2022-006, G-2022-012, and G-2022-016.

c. BSEE has remained consistent with prior civil penalty cases when assessing the violation in this case. GOM Shelf's understanding of how BSEE assesses cases or the difference between the types of cases BSEE assesses is flawed.

1. Civil penalty cases G-2021-034, G-2022-006, G-2022-012, and G-2022-016 were all failure to correct type civil penalties. G-2024-029 is a threat based civil penalty. Failure to correct civil penalties and threat based civil penalties are assessed using entirely different assessment matrices and criteria. Therefore, the reference of the assessments in these cases is not applicable to the assessment of G-2024-029.

D. GOM Shelf believes that the fact the well was shut-in at the time the INC was issued should mitigate the proposed civil penalty assessment.

d. BSEE acknowledges that the well was shut-in at the time the INC was issued. However, a shut-in well does not preclude an operator from their regulatory requirements to ensure platform integrity.

E. GOM Shelf believes the proposed civil penalty assessment does not align with the new Administration's policies. GOM Shelf referenced Executive Order 14154, Interior Secretary Order 3418, Interior Secretary Order 3421, and Interior Secretary Order 3419 claiming that pursuit of a civil penalty in this case would not serve the stated objectives of BSEE's civil penalty program, would be unduly burdensome, and inconsistent with the current policy objectives of the referenced Executive and Secretarial orders.

e. BSEE has determined that the assessed civil penalty for the excessive corrosion of the platform is reasonable and not unduly burdensome or inconsistent with the cited policies.

Final Assessment:

Based on a complete review of the material in this case, BSEE finds that this violation, which occurred on October 7, 2022, constituted a threat of harm to life, property, and/or the environment under the provisions of 43 U.S.C. § 1350(b)(2) and 30 CFR 250.1404(b).

In accordance with the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015 (the 2015 Act) (Section 701 of Public Law 114-74), signed into law on November 2, 2015, directs BSEE to annually adjust the OCSLA maximum civil penalty amount. Pursuant to OCSLA and the 2015 Act, BSEE published a final rulemaking on March 14, 2024, (89 FR 18540) adjusting the OCSLA maximum civil penalty amount at 30 CFR 250.1403. BSEE has revised the Civil Penalty Assessment Matrix to reflect the required increase, effective on March 14, 2024. Consequently, all civil penalties assessed after March 14, 2024, will reflect this new Civil Penalty Assessment Matrix, regardless of when the infraction occurred.

For this Final Decision, BSEE has exercised its discretion, and the final civil penalty assessment will be for the amount previously proposed. In consideration of all the circumstances of this violation, the proposed civil penalty amount has been maintained, and a penalty of **\$27,176** is hereby assessed against GOM Shelf. This amount is based on the following:

- *G-111 (C) INC:* An assessment of **\$27,176** is based on a one (1) day (October 7, 2022) violation of 30 CFR 250.107 for failing to maintain all equipment and work areas in a safe condition. Specifically, the operator failed to mitigate the threat of severe corrosion on the facility.

Rights and Responsibilities

Please see enclosed Payment and Appeal Information, including your rights and payment and appeal procedures.

Your comments are important. The Small Business and Agriculture Regulatory Enforcement Ombudsman and 10 Regional Fairness Boards were established to receive comments from small businesses about federal agency enforcement actions.

The Ombudsman will annually evaluate the enforcement activities and rate each agency's responsiveness to small business. You may comment to the Small Business Administration without fear of retaliation. If you wish to comment on the actions of BSEE call 1-888-REG-FAIR (1-888-734-3247).

If you have any questions concerning this matter, please call me at (504) 736-7520.

Sincerely,

Sean Chryssoverges
Reviewing Officer

Enclosures:
Payment and Appeal Information
ONRR Invoice No: OTH100016910

EXHIBIT A

U.S. Department of the Interior
Office of Natural Resources Revenue

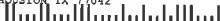
Please Remit To:

ONRR using Pay.gov or another type of Electronic Funds Transfer.

Page: 1
 Invoice No: OTH100016910
 Invoice Date: 07/11/2025
 Customer Number: 25101
 Due Date: 09/14/2025

INVOICE

Customer:

GQM Shelf LLC
 DEIDRE CARRIER
 MELISSA GUIDRY
 2000 W SAM HOUSTRON PKWY S
 STE 1200
 HOUSTON TX 77042


TOTAL AMOUNT DUE : 27,176.00

For billing questions, please call JESSICA.SHEETS@ONRR.GOV

Description	Line	Sales Date	Receipt Date	Orig Due Dt	CSE File Number	AMOUNT DUE:
	MMS Lease No.		Agency Lease	Complex ID	Lease Name	
OCS CIVIL PENALTY CASE NO. G-2024-029; LEASE NO. OCS-G 25605						
REVIEWING OFFICER: Sean Chryssoverges						
PLEASE INCLUDE THE F OR I (FEDERAL OR INDIAN) INDICATOR, CUSTOMER AND INVOICE NUMBERS ON YOUR ELECTRONIC PAYMENT SUBMISSION DATA.						
Civil Penalty	1	07/2025				27,176.00
SUBTOTAL:						
TOTAL AMOUNT DUE :						
27,176.00						

OTH

Duplicate

Payment and Appeal Information

I. General Provisions.

Within 60 days after the date of receipt of this decision, you must accomplish one of the following:

- (1) Pay the civil penalty to the Office of Natural Resources Revenue (ONRR);
- (2) Request Informal Resolution with Reviewing Officer's next-level supervisor; or
- (3) Appeal to the Interior Board of Land Appeals.

II. Your Rights.

You have the right to an administrative appeal to the Interior Board of Land Appeals, pursuant to 30 CFR 290.2; within 60 days of receiving this decision (see Section I, above). In accordance with 30 CFR 290.6, you may seek informal resolution with the Reviewing Officer's next-level supervisor to review the final decision during the 60 day appeal period established in 30 CFR 290.3. This review does not affect the 60-day requirement to either pay the penalty or file an appeal, and does not extend the time to file the Notice of Appeal.

III. Payment Procedures.

Unless you file an appeal in accordance with instructions set forth in Section V of this enclosure, this decision becomes final.

Please identify the payment (wire transfer) as an OCS civil penalty. Include the case number, lease number, invoice number, and your company's ONRR Financial System Customer Code. This will ensure that the payment is properly credited.

The Instruction Guide for Accessing FEDWIRE Deposit System can be found at www.onrr.gov/ONRR/Information/Payments/PayInfo.htm. Questions on wire transfers should be directed to General Ledger Team, ONRR, at (800) 525-0309, extension 3887, or (303) 231-3887.

Example:

Amount of Wire	\$999,999.99 (Payment Amount)
Receiver ABA	021030004
Receiver Name	TREAS NYC
Business Function Code	CTR
Originator	Company Name
Beneficiary:	Company Contact, Telephone Number
ID Code	D
Identifier	14170001
Name and Address	Department of the Interior Bureau of Safety and Environmental Enforcement Denver, Colorado
Originator to Beneficiary	OTH1234567890 (Invoice Number) 09999 (ONRR Assigned Company Number), FED (Indicates Federal Payment) Civil Penalty Case No. G 9999-999 (Civil Penalty Case Number)

Lease No. OCS-G 99999 (Lease Number)

IV. Collection Actions.

The debt becomes delinquent on the 61st day after the date of receipt of the Reviewing Officer's final decision. If the debt becomes delinquent, the result will be a collection of the civil penalty, plus interest, late payment charges, and other fees as provided by law, from the date you received this decision until the date ONRR receives payment.

If your payment is not received immediately, we will take the following collection actions, as necessary, to enforce compliance: issue an additional Notice of Noncompliance and Civil Penalty (30 CFR § 250.1451; 30 CFR § 1241.51); demand payment from lease surety; report your delinquency to a credit bureau including the amount of the debt, date of delinquency, stage of collection, current balance and high balance; refer the debt to the Department of Treasury for collection; refer the debt to a private collection agency; report the debt to the Department of Justice for litigation; refer the debt for administrative offset; report the debt to the Internal Revenue Service for tax refund offset or, if written-off, report the debt as income; and request shutting-in the wells and canceling lease(s), right-of-ways, permits, or licenses.

V. Notice of Appeal.

You have the right to appeal in accordance with the provisions of 30 CFR Part 290, 30 CFR 250.1409, and 43 CFR Part 4, Subpart E. For your appeal to be filed, the Reviewing Officer must receive all of the following within 60 days after you receive the Reviewing Officer's decision:

- (1) A written Notice of Appeal together with a copy of the Reviewing Officer's decision you are appealing. You cannot extend the 60-day period for the Reviewing Officer to receive your Notice of Appeal;
- (2) A nonrefundable processing fee of \$150. You must pay this fee through www.pay.gov. Once you get into www.pay.gov, use form "BSEE Fee for Appeals". You will enter a contact name, telephone number, your company name, and your BSEE assigned 5-digit company number. Under description, identify the number of the civil penalty case you are appealing. You cannot extend the 60-day period for payment of the processing fee; and
- (3) Evidence you submitted a surety bond in the amount of the penalty.

The surety bond must be submitted to the Bureau of Ocean Energy Management's (BOEM's) Leasing and Responsibility Unit of the appropriate region:

AKOCS BOEM Leasing Activities Section 949 E. 36 th Room 308 Anchorage, AK 99508-4363 907-271-6010	GOMR BOEM Leasing & Responsibility Unit 1201 Elmwood Park Blvd. MS 5422 New Orleans, LA 70123-2394 504-736-2803	POCS BOEM Regional Supervisor Office of Strategic Resources 770 Paseo Camarillo Camarillo, CA 93010 805-389-7509
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Instructions on submitting the surety bond can be obtained from the Leasing and Responsibility Unit.

In the alternative, you may notify the Leasing and Responsibility Unit/designated office that you want your lease-specific/area-wide bond on file to be used to cover the penalty amount. The BOEM Regional Director may determine that additional security (i.e., security in excess of your lease-specific/area-wide bond) is necessary to ensure sufficient coverage during the appeal.

If additional security is required, the BOEM Regional Director will require that you post the supplemental bond in a manner consistent with the regulations established for supplemental bonding in 30 CFR §556.53(d) through (f). If the BOEM Regional Director determines the specific appeal should be covered by a lease-specific abandonment account then you must establish an account consistent with the rules and regulations established in 30 CFR §556.56.

You must file a statement of the reasons for filing the appeal within 30 days of filing the Notice of Appeal. This must be filed with the U.S. Department of the Interior, Interior Board of Land Appeals, Office of Hearings and Appeals, U.S. Department of the Interior, 801 N. Quincy Street, Suite 300, Arlington, Virginia 22203 (see 43 CFR § 4.412). Copies of your statement of reasons must be sent to the Reviewing Officer and the appropriate Office of the Solicitor identified in 43 CFR § 4.413. If you fully stated your reasons for appealing when filing your Notice of Appeal, no additional statement is necessary.



Sarah Y. Dicharry
 D: 504.582.8490
 F: 504.589.8490
 sdicharry@joneswalker.com

September 8, 2025

VIA FEDERAL EXPRESS

GOAR BOEM
 Leasing & Responsibility Unit
 1201 Elmwood Park Blvd.
 MS 5422
 New Orleans, LA 70123-2394
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Re: GOM Shelf LLC
 Civil Penalty Case G-2024-029; OCS-G 25605 (HI A 341)

To whom it may concern:

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Sincerely,

A handwritten signature in blue ink that appears to read "Sarah Dicharry".

Sarah Y. Dicharry
 Attorney for GOM Shelf LLC

Enclosures

cc: U.S. Department of the Interior (*via Federal Express*)
 Office of the Solicitor
 Division of Mineral Resources
 1849 C Street, N.W., MS 5358
 Washington, D.C. 20240

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Kathryn E. Schimmel (*via Email*)