

**From:** Luttrell, Kristi M CAPT <Kristi.M.Luttrell@uscg.mil>  
**Sent:** Friday, November 23, 2018 12:41 PM  
**To:** Will Pecue  
**Cc:** Dina Bracci; Rosenblum, Carl; Denise Mustin; Shepard, Mark J CAPT; 'Ed Turner'; Hodzic, Christine L CDR; Haupt, Kelly L LCDR  
**Subject:** [EXTERNAL] RE: follow up to Notice of Federal Assumption

Good afternoon Will,  
Please find the answers to your request below.

The Notice implies that Coast Guard was proceeding with awarding a contract to Couvillion Group, LLC to “perform the removal operations.” Please immediately provide Taylor Energy with a complete copy of the fully executed contract between Coast Guard and Couvillion Group, LLC, including any and all Exhibits or Scope of Work attachments that form the basis of this Contract, all as it relates to Administrative Order 19-001. **Answer:** A FOIA request must be submitted to the Shore Infrastructure Logistics Command (SILC) at 300 E MAIN ST STE 900, Norfolk, VA 23510-9104 for consideration.

You also stated that the “Federal assumption does not relieve you (Taylor Energy) of your financial responsibilities....” In order for Taylor Energy to properly verify the charges for actions taken by Couvillion and Coast Guard, and to be kept abreast of Couvillion’s activities, Taylor Energy requests to be copied (and receive) all communications, written and electronic, between Coast Guard and Couvillion as it relates to this Contract. **Answer:** The items you seek would need to be requested under the Freedom of Information Act to the National Pollution Funds Center (NPFC) 2703 MARTIN LUTHER KING JR AVE SE STOP 7605, Washington, DC 20593-7605. Certain limited documents might be available without submitting a FOIA request but the NPFC would need to be contacted on that.

As a follow up to last week’s presentation by Couvillion to Taylor Energy, I also request a copy of that PowerPoint presentation shown on November 13. In that presentation and in Couvillion’s written proposal that you previously provided to Taylor Energy, Couvillion made mention of its intent to recover any re-useable equipment, as it relates to Taylor Energy’s subsea containment system. Please provide the proper written documentation and legal authority allegedly authorizing Couvillion’s right to use Taylor Energy property. This equipment and system, although damaged as a result of federal agency action, remains Taylor Energy property. **Answer:** Couvillion does not plan on reusing the Collector Separator from previous TEC containment efforts. The PowerPoint you request is property of Couvillion and would need to be requested from them directly.

Best Regards,  
Kristi Luttrell

Kristi M. Luttrell, CAPT, USCG  
Sector Commander  
200 Hende Street  
New Orleans, LA 70114-1402  
504-365-2215



**From:** Will Pecue <wpecue@tayloenergy.com>  
**Sent:** Tuesday, November 20, 2018 5:42 PM  
**To:** Luttrell, Kristi M CAPT <Kristi.M.Luttrell@uscg.mil>  
**Cc:** Dina Bracci <dbracci@tayloenergy.com>; Rosenblum, Carl (crosenblum@joneswalker.com) <crosenblum@joneswalker.com>; Denise Mustin <dmustin@tayloenergy.com>; Shepard, Mark J CAPT <Mark.J.Shepard@uscg.mil>; 'Ed Turner' <ed.turner@theobriensgroup.com>  
**Subject:** [Non-DoD Source] follow up to Notice of Federal Assumption

Capt. Luttrell,

Taylor Energy Company LLC acknowledges receipt of the United States Coast Guard's Notice of Federal Assumption dated November 16, 2018 that you, as FOSC, first sent by email last Friday, November 16<sup>th</sup>. In connection therewith, Taylor Energy makes the following formal requests:

The Notice implies that Coast Guard was proceeding with awarding a contract to Couvillion Group, LLC to "perform the removal operations." Please immediately provide Taylor Energy with a complete copy of the fully executed contract between Coast Guard and Couvillion Group, LLC, including any and all Exhibits or Scope of Work attachments that form the basis of this Contract, all as it relates to Administrative Order 19-001.

You also stated that the "Federal assumption does not relieve you (Taylor Energy) of your financial responsibilities...." In order for Taylor Energy to properly verify the charges for actions taken by Couvillion and Coast Guard, and to be kept abreast of Couvillion's activities, Taylor Energy requests to be copied (and receive) all communications, written and electronic, between Coast Guard and Couvillion as it relates to this Contract.

As a follow up to last week's presentation by Couvillion to Taylor Energy, I also request a copy of that PowerPoint presentation shown on November 13. In that presentation and in Couvillion's written proposal that you previously provided to Taylor Energy, Couvillion made mention of its intent to recover any re-useable equipment, as it relates to Taylor Energy's subsea containment system. Please provide the proper written documentation and legal authority allegedly authorizing Couvillion's right to use Taylor Energy property. This equipment and system, although damaged as a result of federal agency action, remains Taylor Energy property.

Thank you for your cooperation in promptly honoring Taylor Energy's requests.

Regards,

## **Will Pecue**

Taylor Energy Company LLC – President  
One Lee Circle, New Orleans, LA 70130  
504.589.0572 (office)

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