

Filed:
Unanimous
Verdict

LARRY DAVIE MEAUX, ET AL * 15TH JUDICIAL DISTRICT COURT
 *
 * DOCKET NO. 99-72994
 VERSUS *
 * PARISH OF VERMILLION
 *
 HILCORP ENERGY COMPANY, ET AL * STATE OF LOUISIANA

JURY VERDICT FORM

TO THE MEMBERS OF THE JURY:

This Jury Verdict Form must be filled out in accordance with the directions given by the court. When nine jurors agree on the answers to the questions that must be answered, your foreperson should sign and date the Form and then notify the court.

INTERROGATORIES ON ACT 312

"PIT AREA"

- Does environmental damage exist in the "pit area" surrounding the P.O. Landry B-3 salt water disposal well?

Yes _____ No _____
 (If you answered "yes" to this question, go to #2; if "no," then proceed to #3)

- If so, which, if any, of the following Defendants caused this damage?

Union Oil Company of California	Yes _____	No _____
Hilcorp Energy Co.	Yes _____	No _____
LLOG Exploration Co., LLC	Yes _____	No _____
Forest Oil Corporation	Yes _____	No _____

"FISH POND AREA"

- Does environmental damage exist at the Plaintiffs' "fish pond area?"

Yes _____ No _____
 (If you answered "yes" to this question, go to #4; if "no," then proceed to #5)

- If so, which, if any, of the following caused this damage?

Union Oil Company of California	Yes _____	No _____
Hilcorp Energy Co.	Yes _____	No _____
LLOG Exploration Co., LLC	Yes _____	No _____
Forest Oil Corporation	Yes _____	No _____

Plaintiffs	Yes _____	No _____
Other Persons	Yes _____	No _____
Act of God	Yes _____	No _____

"DUCK POND AREA"

5. Does environmental damage exist in the "duck pond area" of Plaintiffs' property?

Yes _____ No

(If you answered "yes" to this question, go to #6; if "no," then proceed to #7)

6. If so, which, if any, of the following caused this damage?

Union Oil Company of California	Yes _____	No _____
Hilcorp Energy Co.	Yes _____	No _____
LLOG Exploration Co., LLC	Yes _____	No _____
Forest Oil Corporation	Yes _____	No _____
Plaintiffs	Yes _____	No _____
Other Persons	Yes _____	No _____
Act of God	Yes _____	No _____

INTERROGATORIES ON BREACH OF CONTRACT CLAIMS

7. Do you find by a preponderance of the evidence that any Defendant exercised its rights under the "Oil, Gas and Mineral Lease" unreasonably or excessively and caused damage to the Plaintiffs' property?

Yes _____ No

(If you answered "yes" to this question, go to #8; if "no," then proceed to #9)

8. State which, if any, of the following Defendants acted unreasonably or excessively in the exercise of their rights under the lease:

a. In the "Pit Area"

Union Oil Company of California	Yes _____	No _____
Hilcorp Energy Co.	Yes _____	No _____
LLOG Exploration Co., LLC	Yes _____	No _____
Forest Oil Corporation	Yes _____	No _____

b. In the "fishing pond"

Union Oil Company of California Yes _____ No _____
 Hilcorp Energy Co. Yes _____ No _____
 LLOG Exploration Co., LLC Yes _____ No _____
 Forest Oil Corporation Yes _____ No _____

c. In the "duck pond"

Union Oil Company of California Yes _____ No _____
 Hilcorp Energy Co. Yes _____ No _____
 LLOG Exploration Co., LLC Yes _____ No _____
 Forest Oil Corporation Yes _____ No _____

INTERROGATORIES ON TORT CLAIMS

9. Do you find by a preponderance of the evidence that any of the Defendants was negligent with respect to the "pit area"?
 Yes No _____
(If you answered "yes" to this question, go to #10; if "no," then proceed to #11)
10. Do you find by a preponderance of the evidence that any of the Defendants' negligence was a legal cause of any damage to the Plaintiffs' property with respect to the "pit area"?
 Yes _____ No
11. Do you find by a preponderance of the evidence that any of the Defendants was negligent with respect to the "fish pond"?
 Yes No _____
(If you answered "yes" to this question, go to #12; if "no," then proceed to #13)
12. Do you find by a preponderance of the evidence that any of the Defendants' negligence was a legal cause of any damage to the Plaintiffs' property with respect to the "fish pond"?
 Yes _____ No
13. Do you find by a preponderance of the evidence that any of the Defendants was negligent with respect to the "duck pond area"?
 Yes No _____
(If you answered "yes" to this question, go to #14; if "no," then proceed to #15)
14. Do you find by a preponderance of the evidence that any of the Defendants' negligence was a legal cause of any damage to the Plaintiffs' property with respect to the "duck pond area"?
 Yes _____ No

15. Do you find by a preponderance of the evidence that any of the Defendants committed an intentional tort with respect to the "pit area"?

Yes _____ No

(If you answered "yes" to this question, go to #16; if "no," then proceed to #17)

16. Do you find by a preponderance of the evidence that any of the Defendants' intentional tort was a legal cause of any damage to the Plaintiffs' property with respect to the "pit area"?

Yes _____ No _____

17. Do you find by a preponderance of the evidence that any of the Defendants committed an intentional tort with respect to the "duck pond area"?

Yes _____ No

(If you answered "yes" to this question, go to #18; if "no," then proceed to #19)

18. Do you find by a preponderance of the evidence that any of the Defendants' intentional tort was a legal cause of any damage to the Plaintiffs' property with respect to the "duck pond area"?

Yes _____ No _____

19. Do you find by a preponderance of the evidence that the Plaintiffs or persons acting on behalf of the Plaintiffs, any other persons not named in the lawsuit, or an Act of God were at fault with respect to the "fish pond"?

Yes No _____

(If you answered "yes" to this question, go to #20; if "no," then proceed to #21)

20. Do you find by a preponderance of the evidence that fault of the Plaintiffs or persons acting on behalf of the Plaintiffs, any other persons not named in the lawsuit or an Act of God were a legal cause of any damage to the Plaintiffs' property with respect to the "fish pond"?

Yes _____ No

21. Do you find by a preponderance of the evidence that the Plaintiffs or persons acting on behalf of the Plaintiffs, any other persons not named in the lawsuit, or an Act of God were at fault with respect to the "duck pond"?

Yes No _____

(If you answered "yes" to this question, go to #22; if "no," then proceed to #23)

22. Do you find by a preponderance of the evidence that fault of the Plaintiffs or persons acting on behalf of the Plaintiffs, any other persons not named in the lawsuit or an Act of God were a legal cause of any damage to the Plaintiffs' property with respect to the "duck pond"?

Yes _____ No

INTERROGATORY ON ALLOCATION OF FAULT

23. State the percentages of fault, if any, of the following for each of the three areas of claimed damage. This means that you must answer any appropriate parts of this question if you have answered "yes" to any of the following sets of questions: Questions #1 and #2; and/ or Questions #3 and #4; and/or Questions #5 and #6; and/or Questions #7 and #8a; and/ or Questions #7 and #8b; and/or Questions #7 and #8c; and/ or Questions #9 and

#10; and/ or Questions #11 and #12; and/ or Questions #13 and #14; and/ or Questions #15 and #16; and/ or Questions #17 and #18; and/ or Questions #19 and #20; and/ or Questions #21 and #22. (The percentages in each column must add up to 100%).

	<u>Pit Area</u>	<u>Fish Pond</u>	<u>Duck Pond Area</u>
Union Oil Company of California	<u>100</u> %	<u>0</u> %	<u>25</u> %
Hilcorp Energy Co.	<u>0</u> %	<u>75</u> %	<u>0</u> %
LLOG Exploration Co., LLC	<u>0</u> %	<u>0</u> %	<u>0</u> %
Forest Oil Corporation	<u>0</u> %	<u>0</u> %	<u>0</u> %
Plaintiffs		<u>0</u> %	<u>25</u> %
Other Persons		<u>0</u> %	<u>25</u> %
Act of God		<u>25</u> %	<u>25</u> %
Total	<u>100%</u>	<u>100%</u>	<u>100%</u>

INTERROGATORIES ON COMPENSATORY DAMAGES

Answer Question #24 only if you have answered "yes" to either of the following sets of questions: Questions #1 and #2; and/ or Questions #7 and #8a; and/ or Questions #9 and #10; and/ or Questions #15 and #16:

24. Please state the amount of money necessary to evaluate and remediate the surface and/or subsurface soil and water of Plaintiffs' property at the "pit area" located near the P.O. Landry B-3 saltwater disposal wells:

\$ 400,000.00

Answer Question #25 only if you have answered "yes" to either of the following sets of questions: Questions #3 and #4; and/ or Questions #7 and #8b; and/ or Questions #11 and #12:

25. Please state the amount of money necessary to evaluate and remediate the Plaintiffs' "fish pond":

\$ 15,000.00

Answer Question #26 only if you have answered "yes" to either of the following sets of questions: Questions #5 and #6; and/ or Questions #7 and #8c; and/ or Questions #13 and #14; and/ or Questions #17 and #18:

26. Please state the amount of money necessary to evaluate and remediate Plaintiffs' "duck pond":

\$ 65,000.00

Answer Question #27 only if you have answered "yes" to any of the following sets of questions: Questions #9 and #10; and/ or Questions #11 and #12; and/ or Questions #13 and #14; and/ or Questions #15 and #16; and Questions #17 and #18:

27. Please state the amount of money, if any, necessary to compensate Plaintiffs for their mental anguish and distress resulting from the damages to their property.

\$ 0

INTERROGATORIES ON PUNITIVE DAMAGES

Answer question #28 only if you have answered "yes" to any of the following sets of questions: Questions #9 and #10; and/ or Questions #15 and #16:

28. Do you find that Unocal acted with wanton or reckless disregard for the public safety in the storage, handling, or transportation of hazardous or toxic substances in connection with the closure of the "pit area?"

Yes _____ No ✓

30.) (If you answered "yes" go to question #29; if you answered "no" proceed to question #

29. State the total amount of punitive damages you find that Unocal should pay the Plaintiffs for damage to their property:

\$ _____

OTHER INTERROGATORIES

30. By what date did the Plaintiffs, their attorneys, consultants, or any other persons acting on their behalf know or reasonably should have known that the "pit area" of their property may have been damaged by any Defendant?

Date 1994

31. By what date did the Plaintiffs, their attorneys, consultants, or any other persons acting on their behalf know or reasonably should have known that the "duck pond area" of their property may have been damaged by any Defendant?

Date 2005

Please have your Foreperson sign and date this Jury Verdict Form and notify the Bailiff.

Signed: Donnie L. Vealey, Foreperson

Date: 8-29-2008