

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA**

HORNBECK OFFSHORE SERVICES, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION NO.
	)	No. 10-1663(F)(2)
KENNETH LEE “KEN” SALAZAR, in his	)	
official capacity as Secretary, United	)	SECTION F
States Department of the Interior;	)	
ROBERT “BOB” ABBEY, in his official	)	JUDGE FELDMAN
capacity as Acting Director, Mineral	)	
Management Service; and MINERALS	)	MAGISTRATE 2
MANAGEMENT SERVICE,	)	MAGISTRATE WILKINSON
	)	
Defendants.	)	
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**DECLARATION OF ALISON CHASE IN SUPPORT OF MOTION TO INTERVENE OF  
NATURAL RESOURCES DEFENSE COUNCIL**

I, Alison Chase, declare as follows:

1. I am an Oceans Policy Analyst for the Natural Resources Defense Council (“NRDC”), a proposed intervenor in the above-captioned action. I have personal knowledge of the following facts and, if called and sworn as a witness, I could and would testify competently to them.

2. NRDC is a national not-for-profit membership organization committed to the preservation, protection, and defense of the environment, public health, and natural resources. For forty years, NRDC has engaged in scientific analysis, public education, advocacy, and litigation on a wide range of environmental and health issues. NRDC has long been active in efforts to protect marine and coastal environments from pollution. In particular, NRDC has worked for over thirty-five years to protect sensitive coastal and marine areas from the harmful effects of offshore drilling, including the impacts of oil spills.

3. NRDC maintains offices in New York City; Washington, D.C.; Chicago; San Francisco and Santa Monica, California; and Beijing, China. NRDC has more than 1.2 million members and e-activists nationwide.

4. NRDC has 42,489 members in the states of Louisiana, Texas, Mississippi, Alabama, and Florida. Specifically, NRDC has 1,908 members in Louisiana; 14,548 members in Texas; 891 members in Mississippi; 1,996 members in Alabama; and 23,146 members in Florida. Due to their proximity to the Gulf of Mexico, some of these members are susceptible to harmful impacts arising from deepwater exploration, drilling, and production activities in the Gulf's Outer Continental Shelf—impacts which the defendants and proposed intervenors seek to prevent by opposing an injunction nullifying the six-month moratorium on such activities. NRDC members in these communities depend on the biological, chemical, and physical integrity of the waters of the Gulf of Mexico and the surrounding coastal environment for a wide range of activities implicating their livelihoods and well-being.

5. NRDC has undertaken sustained efforts to protect the environment and health of its members in Louisiana, Texas, Mississippi, Alabama, and Florida. In particular, NRDC has consistently participated in initiatives to prevent and mitigate harmful impacts arising from offshore drilling in environmentally sensitive areas in the Gulf of Mexico.

6. NRDC therefore has a strong and long-standing interest in supporting the defendants as a means of representing and protecting the interests of its members and advancing its program work. NRDC and its members have an abiding interest in the moratorium, and in defeating plaintiffs' attack on its validity.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2010 in New York, New York.

/s/ Alison Chase