

AFFIDAVIT OF CHAD PICKETT

THE STATE OF TEXAS §
§ KNOW ALL MEN BY THESE PRESENTS:
COUNTY OF CALHOUN §

BEFORE ME, the undersigned authority, personally appeared Chad Pickett, who, being by me duly sworn, upon his oath deposed and stated:

“My name is Chad Pickett. I am over twenty one years of age, of sound mind and competent to make this Affidavit. The facts stated in this Affidavit are within my personal knowledge and are true and correct.

I am employed by Orion Marine Construction, Inc. (hereinafter “Orion”) as a surveyor and have personal knowledge of the surveying performed to support certain dredging operations conducted by Orion, including the dredging of the waterway adjacent to EPIC Crude Terminal Company, LP’s (hereinafter “EPIC”) Corpus Christi, Texas facility in the Corpus Christi Ship Channel.

On Friday, August 21, 2020, I was told by Paul Vasquez to survey (multibeam and RTK) the EPIC area on August 22, 2020 as per Nathan Hawthorn. On Saturday, August 22, 2020, I arrived on location at approximately 0700 to multibeam the area encompassing EPIC plus 300 feet fore and aft from the red to the green side of the channel. I proceeded to survey the area with Glen Kurtz in the boat. Once the survey was complete, the data was sent off for processing. I was then told by Glen Kurtz to obtain coordinates of the top of the pipeline in question using an aluminum RTK pole with a flat aluminum foot on the bottom.

On Tuesday, August 25, 2020, Nick Gregg and I returned to the site to obtain coordinates of the shoreline, pipe line markers, and other pipe lines in the area using the same RTK pole.

On Thursday, August 27, 2020, I arrived on location with Nick Gregg and met with Jacob Bures to perform a single beam hydrographic survey at 5 foot intervals at EPIC. We also used the RTK pole to obtain coordinates of all mooring bollards and anchor buoys to better map the area.

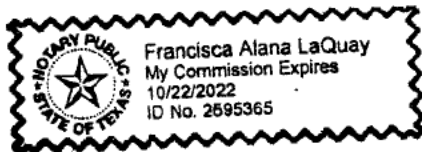
On, Saturday, September 19, 2020, at the request of Matt Piserelle, Nick Gregg and I returned to the site and performed an additional single beam hydrographic survey to focus on the scour under the breached pipeline. We surveyed using sonar at 1 foot intervals to detail the scour. In addition, we obtained additional GPS coordinates for the top of the pipe line using the same RTK pole and set up. We did this by touching the aluminum foot of the RTK pole to the concrete portion of the pipe. The decision to collect coordinates on the pipe this day was our decision, and we were not instructed to do so by anyone. We left the site around 1130 hours.


Further, Affiant sayeth naught.”



CHAD PICKETT

SWORN TO AND SUBSCRIBED BEFORE ME this 8th day of October, 2020, TO WITNESS MY HAND AND SEAL OF OFFICE.





Notary Public in and for the State of Texas