

AFFIDAVIT OF JACOB B. BURES

THE STATE OF TEXAS

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KNOW ALL MEN BY THESE PRESENTS:

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COUNTY OF CALHOUN

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BEFORE ME, the undersigned authority, personally appeared Jacob B. Bures, who, being by me duly sworn, upon his oath deposed and stated:

“My name is Jacob B. Bures. 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 Senior Project Manager related to certain dredging operations conducted by Orion which included dredging the waterway adjacent to EPIC Crude Terminal Company, LP’s (hereinafter “EPIC”) Corpus Christi, Texas facility in the Corpus Christi Ship Channel.

On Saturday, August 22, 2020, Orion’s survey department began conducting multibeam surveys as part of recovery efforts and to enable the Port of Corpus Christi to re-open the channel for marine traffic.

On Tuesday, August 25, 2020, after discussion with Matt Piserelle regarding completing the set of survey data, I requested that Nick Gregg and Chad Pickett return to the site and collect more data. After we received the data from August 25, 2020, I discussed with Matt Piserelle the need to fill in additional missing gaps in the survey data. Matt found us a window of time to conduct this work on August 27, 2020.

On Thursday, August 27, 2020, I arrived at the landing site around 6:30 in the morning and met up with Nick Gregg and Chad Pickett to collect additional survey data on the area for site mapping and imaging of the EPIC site. At approximately 7 a.m. we boarded the survey skiff at the landing site and proceeded to set up the survey equipment in the boat. After running the control procedures for the survey equipment, I talked with Matt Piserelle to confirm clearance of the area. We then proceeded in the survey skiff to collect data for completing the overall site mapping.

I was just an observer in the boat as I do not have survey experience; thus, I did not operate any of the equipment.

As this was a hydrographic survey, we, essentially just drove the boat over the area, and the equipment collected the data. Due to the high tides for the day we were able to perform a thorough hydrographic survey of the area. Also, Chad Pickett had his RTK equipment with him, and he collected GPS points on the three mooring dolphins in that area and the anchor buoys. Upon completion of gathering the data we proceeded back to the landing site. I coordinated with Matt Piserelle about us leaving the area and that we were clear of the site.

I was not involved with any other post-incident surveys of the site.


Further, Affiant sayeth naught.”



JACOB B. BURES

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





Notary Public in and for the State of Texas