

Exhibit A

**Declaration of Ed Loganecker,
Texas Independent Producers & Royalty Owners
Association (“TIPRO”)**

**UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT**

STATE OF LOUISIANA,
AMERICAN PETROLEUM INSTITUTE,
and CHEVRON U.S.A. INC.,

Plaintiffs-Appellees,

v.

DEB HAALAND, in her official capacity
as Secretary of the Interior; et. al.

Defendants-Appellants.

No. 23-30666

SHELL OFFSHORE INC.,

Plaintiff-Appellee,

v.

U.S DEPARTMENT OF THE INTERIOR,
et al.,

Defendants-Appellants.

DECLARATION OF ED LOGANECKER

1. I, ED LOGANECKER, declare as follows:
2. I am the President of the Texas Independent Producers & Royalty Owners Association (“TIPRO”). The facts set forth in this declaration are based on both my personal knowledge and information gathered in the course of my business activities.
3. TIPRO is one of the country’s largest oil-and-gas trade associations. Formed in 1946, TIPRO advocates to preserve the ability for independents to explore

for and produce oil and natural gas. The association is one of the oldest and largest oil and natural gas advocacy non-profit organizations in the state of Texas. The organization's nearly 3000 members include small family-owned businesses and the largest publicly traded independent oil and gas producers, in addition to large and small royalty owners. Many of our members have interests in Federal Offshore leasing in the Gulf of Mexico as royalty interest owners and as principals in companies operating in the Gulf of Mexico.

4. I have been employed at TIPRO for over 10 years. My work covers all operational responsibilities for the organization and representing member companies on legal, legislative, and regulatory priorities. Based on my experience at TIPRO, I am familiar with our member companies' activities concerning United States Outer Continental Shelf ("OCS") exploration and production, including activities relating to the leasing process on the Gulf of Mexico OCS generally and with respect to Lease Sale 261 specifically.

5. The Government's request for an emergency stay in this case is based in large part on the proposition that the district court's order requiring the Bureau of Ocean Energy Management ("BOEM") to hold Lease Sale 261 by the September 30 deadline set forth in the Inflation Reduction Act "is unfair to sale participants who are *not* parties to this case." Gov't Mot. 27. The Government cites no evidence to support its theory, and it directly contradicts TIPRO's position.

6. TIPRO is not a party to this case, but it has closely followed this litigation, and its members strongly support holding Lease Sale 261 by the September 30 statutory deadline. In fact, TIPRO's members believe that it would be grossly unfair to delay Lease Sale 261 as the Government is demanding.

7. TIPRO members have scheduled employee work time, made financial commitments, evaluated potential lease blocks, and prepared bids in the expectation that Lease Sale 261 would occur in accordance with the 2017 Five-Year Plan, with bids submitted on September 26, 2023, to conform to the September 30 deadline mandated by the Inflation Reduction Act.

8. Further, TIPRO members expect that Lease Sale 261 will offer for lease all of the blocks described in the Proposed Notice of Sale made available on BOEM's website to potential bidders on March 10, 2023. The pattern for all nine Lease Sales so far in the 2017 Five-Year plan has been for BOEM to offer the entire Central and Western Gulf area for lease, minus a small number of blocks surrounding the long-established marine sanctuaries at the Flower Garden Banks, certain isolated topographic features, and reserved military areas. The only new, reserved, unleaseable areas in this sale were to be the Wind Energy lease areas on the Shelf which were announced more than a year ago. That was what was presented to potential bidders, both in text and in map format made available to potential bidders in the Proposed Notice of Sale. TIPRO members were shocked to find that, 30 days

before the Sale, BOEM proposed to remove more than 6 million acres of potential lease area stretching across the entire Central and Western Gulf. This was a surprise because there is no precedent for, and there was no prior notice of, this scale of acreage removal so close to the date of the sale.

9. TIPRO members have been following the proceedings in this case, in both the district court and this Court, and have prepared bids to be submitted by the September 26 deadline in the expectation that the 6 million acres will be restored to the available area for lease in accordance with the 2017 Five-Year Plan and the Proposed Notice of Sale 261, and in accordance with the Western District of Louisiana Order on September 21, 2023 granting the preliminary injunction to stop the removal.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing statements are true and correct based upon my personal knowledge.



Ed Loganecker
President
Texas Independent Producers & Royalty Owners Association
Austin