

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

In Re: Oil Spill By The Oil Rig	*	MDL No. 2179
“Deepwater Horizon” in the Gulf	*	
of Mexico, on April 20, 2010	*	SECTION J
	*	
This Document Relates To:	*	JUDGE BARBIER
No. 10-4536, and:	*	
10-3059, 10-4182, 10-4183, 11-516,	*	
13-2645, 13-2646, 13-2749, 13-2813,	*	MAGISTRATE JUDGE SHUSHAN
13-4677, and 14-0614	*	

UNOPPOSED MOTION BY THE UNITED STATES
FOR ENTRY OF CONSENT DECREE WITH BP

The United States, the plaintiff in Civil Action 10-4536, requests that this Court approve and enter the proposed Consent Decree with BP Exploration & Production Inc. [Doc. 15436-1 (which was attached to the Notice of Lodging of Consent Decree)].

Entry of the proposed Decree was conditioned on the United States’ (and States’) review of any public comment. C.D. ¶¶ 80 & 81. The federal government provided two separate extensive, 60-day public comment periods, and held 8 public meetings, including meetings in each Gulf State and the District of Columbia. In all, the United States received comments from over 34,000 commenters. The attached Memorandum and exhibits address the most significant of the comments.

A court should enter a consent decree if it is fair, adequate, reasonable, and consistent with the objectives of the law. The proposed Decree plainly meets this standard, because it punishes BP, sends a clear deterrent message to the entire industry, and fully compensates the public for harm caused to natural resources. None of the comments discloses any fact or condition suggesting that the proposed Decree is anything other than extraordinarily favorable and in the public interest.

This Motion is also unopposed. BP has consented to entry of the proposed Decree without further notice. C.D. ¶ 83. Representatives of the five Gulf Coast States have confirmed that they also support entry of the Decree.

Therefore, the United States moves the Court to execute page 61 of the proposed Decree, [Doc. 15436-1 at ECF page 64 of 90] and enter the proposed Decree as a final judgment. A proposed judgment is also attached.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing document has been served on all counsel by electronically uploading the same to Lexis Nexis File & Serve in accordance with Pretrial Order No. 12, and that the foregoing was electronically filed with the Clerk of Court of the United States District Court for the Eastern District of Louisiana by using the CM/ECF System, which will send a notice of electronic filing in accordance with the procedures established in MDL 2179, on March 22, 2016.

/s/ Steve O'Rourke
U.S. Department of Justice