UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF LOUISIANA

HORNBECK OFFSHORE SERVICES, **CIVIL ACTION** L.L.C., NO. 10-1663(F)(2)

Plaintiff

VERSUS SECTION F

KENNETH LEE "KEN" SALAZAR, JUDGE FELDMAN

IN HIS OFFICIAL CAPACITY AS

SECRETARY, UNITED STATES

DEPARTMENT OF INTERIOR; MAGISTRATE 2

UNITED STATES DEPARTMENT MAGISTRATE WILKINSON

OF INTERIOR; ROBERT "BOB"

ABBEY, IN HIS OFFICIAL CAPACITY AS ACTING DIRECTOR,

MINERALS MANAGEMENT

SERVICE; AND MINERALS

MANAGEMENT SERVICE, **Defendants**

PLAINTIFFS' RENEWED MOTION TO ENFORCE PRELIMINARY INJUNCTION ORDER

NOW INTO COURT, through undersigned counsel, come Plaintiffs Hornbeck Offshore Services, L.L.C., the Chouest Entities and the Bollinger Entities (collectively, "Plaintiffs"), which move this Court to enter an order enforcing the Court's June 22, 2010 Order, pursuant to which the Court "immediately prohibited" Defendants from enforcing a moratorium "applied to all drilling on the OCS in water at depths greater than 500 feet." Rec. Doc. 68. Despite Defendants' multiple efforts to circumvent and moot it, this Court's preliminary injunction remains in full force and effect. Moreover, as the Court has now concluded, Defendants' July 12th moratorium is the "functional equivalent" of the first one in that it "covers precisely the same rigs and precisely the same deepwater drilling in the Gulf of Mexico." Rec. 165 at 2, 5. The July 12th moratorium therefore violates the preliminary injunction order because it continues, in a different guise, a prohibition as to "all drilling on the OCS in water at depths greater than 500 feet." Rec. Doc. 68.

For the reasons set forth more fully in the accompanying memorandum in support, Plaintiffs respectfully request that the Court enter an Order that: (a) orders that Defendants' July 12th moratorium violates this Court's June 22, 2010 Order by continuing to enforce the same moratorium "applied to all drilling on the OCS in water at depths greater than 500 feet;" (b) orders that Defendants comply with the terms of the June 22, 2010 Order; and (c) orders that Defendants are accordingly immediately prohibited from enforcement of the July 12th moratorium. A proposed order is attached hereto.

Conclusion

For all the reasons set forth above, Plaintiffs ask this Court to grant their renewed motion to enforce preliminary injunction order.

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Respectfully submitted,

s | Carl D. Rosenblum

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Attorneys for Plaintiffs, Hornbeck Offshore Services, L.L.C., The Chouest Entities, and The Bollinger Entities.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing pleading has been served upon all parties by email or by using the CM/ECF system which will send a Notice of Electronic filing to all counsel of record, this 7th day of September, 2010.

s | Carl D. Rosenblum

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