



IN THE DISTRICT COURT OF TULSA COUNTY, OKLAHOMA
STATE OF OKLAHOMA

LERROY PETERS; LEWIS BUMPERS JR.; Case No.
LINDA DREW; LINDA DUNDEE; LINDA
L. PARKER; LISA DIXON, RICHARD
DIXON; LIZZIE PARKER; LORETTA
WESTHOFF, MICHAEL WESTHOFF; LOU
BELLMARD; LYLE R. HOLLEY; MAE
YVONNE CHAPMAN; MAHVASH
KHOSROWYAR; MARC C COOK; MARIA
G. ROSS; MARILYN BARNES, RANDY J.
BARNES; MARIUM JULIE BARCLAY;
MARK A. ELLIS; MARK NOSICH; MARY
ANN FRUGE; MELANIE HOUGH;
MICHAEL D. WASHINGTON; MICHAEL
DUNN, SUSAN E. DUNN; MICHAEL
LOVINS; MICHELLE HAMILTON;
MICHELLE WILLIS; MIRYOM GOLDEN;
MONTECELLA DRIVER; NANCY G.
LESLIE; NANCY WALTER; NATHAN
HARRIS; NORMA ELDER MORGAN;
NORRIS E. MINOR; OIL CAPITOL
SINGERS UNION; PATRICE A.
MITCHELL; PATTY FRY; PREVIN
DIXON; RANDY L. JONES; RANDY L.
JONES; RAYMOND REED; REGINALD D.
LEWIS SR.; RICHARD A. HARRIS;
RICHARD S VANHEEL; RITA DUNCAN;
ROB BREWER; RODNEY HUNT;
RODNEY MCDONELL, RODNEY V.
MCDONELL; RONALD BENSKEN; ROSE
M. BROWN; RUSSELL MCCALMENT;
RUTH L. JONES; SANDRA WAGNER;
SEAN D. SEABOROUGH; SHARLON K
CORTES; SHARON DEHAARTE;
SHARON L. JONES; SHARON
MCAULIFF; SHARON SHAW; SHARRON
WATSON; SHEILIA BROWN; SHELLEY
FREE; SHELLEY CHOATE; SHERRIE
WALLACE; SHERRY SMITH; SHIRLEY
BOYLES; STARR ERNST; STEPHEN
STORY; STEVEN DAVIS; STEVEN
LANGGIN; SUSAN C. NICHOLSON;
SUSAN COOK; SUSIE PALAZZO;
SYLVESTER SAVAGE; TAFFINE D.

DISTRICT COURT
FILED

DEC 20 2018

DON NEWBERRY, Court Clerk
STATE OF OKLA, TULSA COUNTY

CJ-2018-05139

Linda Morrissey

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TULSA COUNTY

PRICE; TAMI L. THOMPSON; THEAN R.
PARKER; THEODORE HOOKS III;
THOMAS E. ADAIR JR; TRACY NEELEY;
VERNICE SMITH; VICTOR E. VANN III;
VICTOR HURSH; VIRGINIA THOMAS-
COBB; VIVIAN CLARK-ADAMS;
WANDA M. STEVENS; WANDA
PARSONS; WAYNE E. FOOTE; WILLARD
ROBINSON; WILLIAM KEIGHTLY;
WILLIAM V. EDDY JR.; WYETH HALL
and YVETTE WILLIAMS,

Plaintiffs,

V

BEREXCO LLC;
CHER OIL COMPANY, LTD;
CHESAPEAKE OPERATING, LLC;
CIMARRON RIVER OPERATING CORP.;
CIRCLE 9 RESOURCES, LLC;
CROWN ENERGY COMPANY; EQUAL
ENERGY US INC.; FHA INVESTMENTS
LLC; INTERNATIONAL ENERGY
CORPORATION; KOBAY OIL COMPANY
LLC; MARJO OPERATING MID-
CONTINENT LLC; MID-CON ENERGY
OPERATING LLC; MONTCLAIR
ENERGY LLC; OAKLAND PETROLEUM
OPERATING COMPANY INC; ORCA
OPERATING COMPANY LLC; PETCO
PETROLEUM CORP; PETRO WARRIOR
LLC; RANGE PRODUCTION COMPANY
LLC;SHEILDS OPERATING INC.;
SPECIAL ENERGY CORPORATION;
TARKA ENERGY LLC;
TERRITORY RESOURCES LLC;
WHITE STAR PETROLEUM LLC;
and DOES 1-25, Inclusive,

Defendants.

PETITION FOR DAMAGES

COME NOW Plaintiffs, LEROY PETERS; LEROY PETERS; LEWIS BUMPERS JR.; LINDA DREW; LINDA DUNDEE; LINDA L. PARKER; LISA DIXON, RICHARD DIXON; LIZZIE PARKER; LORETTA WESTHOFF, MICHAEL WESTHOFF; LOU BELLMARD; LYLE R. HOLLEY; MAE YVONNE CHAPMAN; MAHVASH KHOSROWYAR; MARC C COOK; MARIA G. ROSS; MARILYN BARNES, RANDY J. BARNES; MARIUM JULIE BARCLAY; MARK A. ELLIS; MARK NOSICH; MARY ANN FRUGE; MELANIE HOUGH; MICHAEL D. WASHINGTON; MICHAEL DUNN, SUSAN E. DUNN; MICHEAL LOVINS; MICHELLE HAMILTON; MICHELLE WILLIS; MIRYOM GOLDEN; MONTECELLA DRIVER; NANCY G. LESLIE; NANCY WALTER; NATHAN HARRIS; NORMA ELDER MORGAN; NORRIS E. MINOR; OIL CAPITOL SINGERS UNION; PATRICE A. MITCHELL; PATTY FRY; PREVIN DIXON; RANDY L. JONES; RANDY L. JONES; RAYMOND REED; REGINALD D. LEWIS SR.; RICHARD A. HARRIS; RICHARD S VANHEEL; RITA DUNCAN; ROB BREWER; RODNEY HUNT; RODNEY MCDONELL, RODNEY V. MCDONELL; RONALD BENSKEN; ROSE M. BROWN; RUSSELL MCCALMENT; RUTH L. JONES; SANDRA WAGNER; SEAN D. SEABOROUGH; SHARLON K CORTES; SHARON DEHAARTE; SHARON L. JONES; SHARON MCAULIFF; SHARON SHAW; SHARRON WATSON; SHEILIA BROWN; SHELLEY FREE; SHELLEY CHOATE; SHERRIE WALLACE; SHERRY SMITH; SHIRLEY BOYLES; STARR ERNST; STEPHEN STORY; STEVEN DAVIS; STEVEN LANGGIN; SUSAN C. NICHOLSON; SUSAN COOK; SUSIE PALAZZO; SYLVESTER SAVAGE; TAFFINE D. PRICE; TAMI L. THOMPSON; THEAN R. PARKER; THEODORE HOOKS III; THOMAS E. ADAIR JR; TRACY NEELEY; VERNICE SMITH; VICTOR E. VANN III; VICTOR HURSH;

VIRGINIA THOMAS-COBB; VIVIAN CLARK-ADAMS; WANDA M. STEVENS; WANDA PARSONS; WAYNE E. FOOTE; WILLARD ROBINSON; WILLIAM KEIGHTLY; WILLIAM V. EDDY JR.; WYETH HALL and YVETTE WILLIAMS, ("Plaintiffs") property owners in Oklahoma, who state the following causes of action against Defendants, BEREXCO LLC; CHER OIL COMPANY, LTD; CHESAPEAKE OPERATING, LLC; CIMARRON RIVER OPERATING CORP.; CIRCLE 9 RESOURCES, LLC; CROWN ENERGY COMPANY; EQUAL ENERGY US INC.; FHA INVESTMENTS, LLC; INTERNATIONAL ENERGY CORPORATION; KOBY OIL COMPANY, LLC; MARJO OPERATING MID-CONTINENT LLC; MID-CON ENERGY OPERATING, LLC; MONTCLAIR ENERGY, LLC; OAKLAND PETROLEUM OPERATING COMPANY INC; ORCA OPERATING COMPANY, LLC; PETCO PETROLEUM CORP; PETRO WARRIOR, LLC; RANGE PRODUCTION COMPANY, LLC; SHEILDS OPERATING INC.; SPECIAL ENERGY CORPORATION; TARKA ENERGY LLC; TERRITORY RESOURCES LLC; WHITE STAR PETROLEUM LLC and DOES 1-25, Inclusive, ("Defendants"):

I. GENERAL NATURE OF ACTION

1. This is a lawsuit brought by Oklahoma residents who own, or at all relevant times herein, owned, real property in the State of Oklahoma, whose property suffered damages and losses from human-induced earthquakes caused by Defendants' operation of in wastewater disposal wells in and around the State of Oklahoma.

2. Plaintiffs seek damages, joint and severally from the Defendants, in the form of the following:

- (i) Physical damages to real and personal property;
- (ii) Market value losses to their real property;

(iii) Emotional distress; and

(iv) Punitive damages.

II. PARTIES

PLAINTIFFS

3. At all times herein relevant, Plaintiff Leroy Peters was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said properties are located at 1802 N Madison Avenue and 647 E. 52nd Street North. Plaintiff Leroy Peters' property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

4. At all times herein relevant, Plaintiff Lewis Bumpers Jr. was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 1530 East 56th Street North. Plaintiff Lewis Bumpers Jr.'s property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

5. At all times herein relevant, Plaintiff Linda Drew was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 6967 E 17th Street. Plaintiff Linda Drew's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

6. At all times herein relevant, Plaintiff Linda Dundee is a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 4377 South Yale. Plaintiff Linda Dundee's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

7. At all times herein relevant, Plaintiff Linda L. Parker was a property owner and resident of the City of Collinsville, Tulsa County, Oklahoma. Said property is located at 7011 E

166th Street North. Plaintiff Linda L. Parker's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

8. At all times herein relevant, Plaintiff Lisa Dixon and Plaintiff Richard Dixon were property owners and residents of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 2516 W Broadway Street. Plaintiff Lisa Dixon and Plaintiff Richard Dixon's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

9. At all times herein relevant, Plaintiff Lizzie Parker was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 219 W Victoria Street North. Plaintiff Lizzie Parker's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

10. At all times herein relevant, Plaintiff Loretta Westhoff and Plaintiff Michael Westhoff were property owners and residents of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2129 West 45th Place. Plaintiff Loretta Westhoff and Plaintiff Michael Westhoff's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

11. At all times herein relevant, Plaintiff Lou Bellmard was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 7416 W 38th Street. Plaintiff Lou Bellmard's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

12. At all times herein relevant, Plaintiff Lyle R. Holley was a property owner and resident of the City of Sand Springs, Tulsa County, Oklahoma. Said property is located at 1810

S. 155 W. Avenue. Plaintiff Lyle R. Holley's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

13. At all times herein relevant, Plaintiff Mae Yvonne Chapman was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 6357 S 80th East Avenue Apartment C. Plaintiff Mae Yvonne Chapman's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

14. At all times herein relevant, Plaintiff Mahvash Khosrowyar was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 5011 East 110th Street. Plaintiff Mahvash Khosrowyar's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

15. At all times herein relevant, Plaintiff Marc C. Cook was a property owner and resident of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 801 W Norman Street. Plaintiff Marc C. Cook's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

16. At all times herein relevant, Plaintiff Maria G. Ross was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 15014 East 35th Street. Plaintiff Maria G. Ross's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

17. At all times herein relevant, Plaintiff Marilyn Barnes and Plaintiff Randy J. Barnes were property owners and residents of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 1711 N. Ironwood Avenue. Plaintiff Marilyn Barnes and Plaintiff Randy J. Barnes's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

18. At all times herein relevant, Plaintiff Marium Julie Barclay was a property owner and resident of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 1324 West Pittsburg Street. Plaintiff Marium Julie Barclay's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

19. At all times herein relevant, Plaintiff Mark A. Ellis was a property owner and resident of the City of Owasso, Tulsa County, Oklahoma. Said property is located at 7695 N 137th E Avenue. Plaintiff Mark A. Ellis's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

20. At all times herein relevant, Plaintiff Mark Nosich was a property owner and resident of the City of Collinsville, Tulsa County, Oklahoma. Said property is located at 12620 North 129th East Avenue. Plaintiff Mark Nosich's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

21. At all times herein relevant, Plaintiff Mary Ann Fruge was a property owner and resident of the City of Sperry, Tulsa County, Oklahoma. Said property is located at 122 E Main St. Plaintiff Mary Ann Fruge's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

22. At all times herein relevant, Plaintiff Melanie Hough was a property owner and resident of the City of Sand Springs, Tulsa County, Oklahoma. Said property is located at 3110 Maple Drive. Plaintiff Melanie Hough's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

23. At all times herein relevant, Plaintiff Michael D. Washington was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at

1719 South 110th East Avenue. Plaintiff Michael D. Washington's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

24. At all times herein relevant, Plaintiff Michael Dunn, Susan E. Dunn was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 4326 S 29 W Avenue. Plaintiff Michael Dunn, Susan E. Dunn's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

25. At all times herein relevant, Plaintiff Micheal Lovins was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 141 South 168th East Avenue. Plaintiff Micheal Lovins's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

26. At all times herein relevant, Plaintiff Michelle Hamilton was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2904 S. 49th W. Ave.. Plaintiff Michelle Hamilton's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

27. At all times herein relevant, Plaintiff Michelle Willis was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 11550 East 7th Place. Plaintiff Michelle Willis's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

28. At all times herein relevant, Plaintiff Miryom Golden was a property owner and resident of the City of Owasso, Tulsa County, Oklahoma. Said property is located at 320 N Cedar Street. Plaintiff Miryom Golden's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

29. At all times herein relevant, Plaintiff Montecella Driver was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 620 N 28th Place West. Plaintiff Montecella Driver's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

30. At all times herein relevant, Plaintiff Nancy G. Leslie was a property owner and resident of the City of Glenpool, Tulsa County, Oklahoma. Said property is located at 16120 South Elwood Avenue. Plaintiff Nancy G. Leslie's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

31. At all times herein relevant, Plaintiff Nancy Walter was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 3247 East 61st Place. Plaintiff Nancy Walter's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

32. At all times herein relevant, Plaintiff Nathan Harris was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 15 41 N Detroit Avenue. Plaintiff Nathan Harris's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

33. At all times herein relevant, Plaintiff Norma Elder Morgan was a property owner and resident of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 401 North Elder Avenue. Plaintiff Norma Elder Morgan's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

34. At all times herein relevant, Plaintiff Norris E. Minor was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 332 Mohawk

Boulevard. Plaintiff Norris E. Minor's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

35. At all times herein relevant, Plaintiff Oil Capitol Singers Union was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2624 N. St. Louis. Plaintiff Oil Capitol Singers Union's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

36. At all times herein relevant, Plaintiff Patrice A. Mitchell was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 8518 East 78 Street. Plaintiff Patrice A. Mitchell's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

37. At all times herein relevant, Plaintiff Patty Fry was a property owner and resident of the City of Owasso, Tulsa County, Oklahoma. Said property is located at 16609 E 83rd St N. Plaintiff Patty Fry's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

38. At all times herein relevant, Plaintiff Previn Dixon was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 13712 E 24th Pl. Plaintiff Previn Dixon's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

39. At all times herein relevant, Plaintiff Randy L. Jones was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 1551 S. 76th E. Avenue. Plaintiff Randy L. Jones's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

40. At all times herein relevant, Plaintiff Randy L. Jones was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 6798 E. 26th Pl.. Plaintiff Randy L. Jones's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

41. At all times herein relevant, Plaintiff Raymond Reed was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2723 N Quincy Ave. Plaintiff Raymond Reed's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

42. At all times herein relevant, Plaintiff Reginald D. Lewis Sr. was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 5031 North Osage Drive. Plaintiff Reginald D. Lewis Sr.'s property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

43. At all times herein relevant, Plaintiff Richard A. Harris was a property owner and resident of the City of Sand Springs, Tulsa County, Oklahoma. Said property is located at 17402 W. 32nd Street. Plaintiff Richard A. Harris's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

44. At all times herein relevant, Plaintiff Richard S VanHeel was a property owner and resident of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 4408 South Ironwood Avenue. Plaintiff Richard S VanHeel's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

45. At all times herein relevant, Plaintiff Rita Duncan was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 330 East

Xyler Street. Plaintiff Rita Duncan's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

46. At all times herein relevant, Plaintiff Rob Brewer was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 16702 S Harvard Avenue. Plaintiff Rob Brewer's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

47. At all times herein relevant, Plaintiff Rodney Hunt is a property owner and resident of the City of Skiatook, Tulsa County, Oklahoma. Said property is located at 13521 N. Cincinnati. Plaintiff Rodney Hunt's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

48. At all times herein relevant, Plaintiff Rodney McDonell and Plaintiff Rodney V. McDonell were property owners and residents of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 11401 East 61st Place. Plaintiff Rodney McDonell and Plaintiff Rodney V. McDonell's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

49. At all times herein relevant, Plaintiff Ronald Bensken was a property owner and resident of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 4000 S. Chestnut Avenue. Plaintiff Ronald Bensken's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

50. At all times herein relevant, Plaintiff Rose M. Brown was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2427 N Boston Place. Plaintiff Rose M. Brown's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

51. At all times herein relevant, Plaintiff Russell Mccalment was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 3607 East 24th Street. Plaintiff Russell Mccalment's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

52. At all times herein relevant, Plaintiff Ruth L. Jones was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 1707 N. Atlanta Ave.. Plaintiff Ruth L. Jones's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

53. At all times herein relevant, Plaintiff Sandra Wagner was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 9616 South 90th East Avenue. Plaintiff Sandra Wagner's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

54. At all times herein relevant, Plaintiff Sean D. Seaborough was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 3742 North Iroquois. Plaintiff Sean D. Seaborough's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

55. At all times herein relevant, Plaintiff Sharlon K Cortes was a property owner and resident of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 1512 W Indianola St. Plaintiff Sharlon K Cortes's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

56. At all times herein relevant, Plaintiff Sharon DeHaarte was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 10924 E 66th

Street. Plaintiff Sharon DeHaarte's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

57. At all times herein relevant, Plaintiff Sharon L. Jones was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 1538 N. Yorktown Avenue. Plaintiff Sharon L. Jones's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

58. At all times herein relevant, Plaintiff Sharon McAuliff was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 1263 North Braden Avenue. Plaintiff Sharon McAuliff's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

59. At all times herein relevant, Plaintiff Sharon Shaw was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 545 E Mohawk Blvd. Plaintiff Sharon Shaw's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

60. At all times herein relevant, Plaintiff Sharron Watson was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2317 E 13th Street. Plaintiff Sharron Watson's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

61. At all times herein relevant, Plaintiff Sheilia Brown was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 208 W 65th Place North. Plaintiff Sheilia Brown's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

62. At all times herein relevant, Plaintiff Shelley Free was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 204 N. Santa Fe Avenue. Plaintiff Shelley Free's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

63. At all times herein relevant, Plaintiff Shelly Choate was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 111 North 37th W Avenue. Plaintiff Shelly Choate's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

64. At all times herein relevant, Plaintiff Sherrie Wallace was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 1846 N. St. Louis Ave.. Plaintiff Sherrie Wallace's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

65. At all times herein relevant, Plaintiff Sherry Smith was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2887 East 44th Place North. Plaintiff Sherry Smith's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

66. At all times herein relevant, Plaintiff Shirley Boyles was a property owner and resident of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 2605 W Greeley Street. Plaintiff Shirley Boyles's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

67. At all times herein relevant, Plaintiff Starr Ernst was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 10955 E 36th

Place. Plaintiff Starr Ernst's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

68. At all times herein relevant, Plaintiff Stephen Story was a property owner and resident of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 1312 West El Paso Street. Plaintiff Stephen Story's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

69. At all times herein relevant, Plaintiff Steven Davis was a property owner and resident of the City of Sand Springs, Tulsa County, Oklahoma. Said property is located at 501 E 17th Street. Plaintiff Steven Davis's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

70. At all times herein relevant, Plaintiff Steven Langgin was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 5879 East 21st Place. Plaintiff Steven Langgin's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

71. At all times herein relevant, Plaintiff Susan C. Nicholson was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 3619 South 31st West Avenue. Plaintiff Susan C. Nicholson's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

72. At all times herein relevant, Plaintiff Susan Cook was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2121 S Terwilleger Boulevard. Plaintiff Susan Cook's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

73. At all times herein relevant, Plaintiff Susie Palazzo was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2213 N Elwood Ave. Plaintiff Susie Palazzo's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

74. At all times herein relevant, Plaintiff Sylvester Savage was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2533 North Main Street. Plaintiff Sylvester Savage's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

75. At all times herein relevant, Plaintiff Taffine D. Price was a property owner and resident of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 112 E Ithica Place. Plaintiff Taffine D. Price's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

76. At all times herein relevant, Plaintiff Tami L. Thompson was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 3738 East 29th Street. Plaintiff Tami L. Thompson's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

77. At all times herein relevant, Plaintiff Thean R. Parker was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 3352 S 140th E Avenue. Plaintiff Thean R. Parker's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

78. At all times herein relevant, Plaintiff Theodore Hooks III was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2260 N.

Xanthus Avenue. Plaintiff Theodore Hooks III's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

79. At all times herein relevant, Plaintiff Thomas E. Adair Jr was a property owner and resident of the City of Broken Arrow, Tulsa County, Oklahoma. Said property is located at 1805 W Honolulu Street. Plaintiff Thomas E. Adair Jr's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

80. At all times herein relevant, Plaintiff Tracy Neeley was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 214 South Jamestown Avenue. Plaintiff Tracy Neeley's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

81. At all times herein relevant, Plaintiff Vernice Smith was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 1540 N. Frankfort. Plaintiff Vernice Smith's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

82. At all times herein relevant, Plaintiff Victor E. Vann III was a property owner and resident of the City of Sand Springs, Tulsa County, Oklahoma. Said property is located at 105 North Franklin Avenue. Plaintiff Victor E. Vann III's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

83. At all times herein relevant, Plaintiff Victor Hursh was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2264 North Columbia Avenue. Plaintiff Victor Hursh's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

84. At all times herein relevant, Plaintiff Virginia Thomas-Cobb was a property owner and resident of the City of Collinsville, Tulsa County, Oklahoma. Said property is located at 7514 E. 126th St. N.. Plaintiff Virginia Thomas-Cobb's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

85. At all times herein relevant, Plaintiff Vivian Clark-Adams was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 1914 N Santa Fe Place. Plaintiff Vivian Clark-Adams's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

86. At all times herein relevant, Plaintiff Wanda M. Stevens was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 2811 North Yorktown Avenue. Plaintiff Wanda M. Stevens's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

87. At all times herein relevant, Plaintiff Wanda Parsons was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 9209 E 46th Pl. Plaintiff Wanda Parsons's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

88. At all times herein relevant, Plaintiff Wayne E. Foote was a property owner and resident of the City of Glenpool, Tulsa County, Oklahoma. Said property is located at 1056 E 144th Place. Plaintiff Wayne E. Foote's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

89. At all times herein relevant, Plaintiff Willard Robinson was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 4955 N

Johnson Avenue. Plaintiff Willard Robinson's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

90. At all times herein relevant, Plaintiff William Keightly was a property owner and resident of the City of Sand Springs, Tulsa County, Oklahoma. Said property is located at 27246 W. 41st Street. Plaintiff William Keightly's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

91. At all times herein relevant, Plaintiff William V. Eddy Jr. was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 9611 S Winston Avenue. Plaintiff William V. Eddy Jr.'s property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

92. At all times herein relevant, Plaintiff Wyeth Hall was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 312 E Woodrow Street. Plaintiff Wyeth Hall's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

93. At all times herein relevant, Plaintiff Yvette Williams was a property owner and resident of the City of Tulsa, Tulsa County, Oklahoma. Said property is located at 3022 South 86th East Avenue. Plaintiff Yvette Williams's property suffered damages due to earthquakes caused by the Defendants' negligent wastewater disposal operations.

DEFENDANTS

94. Defendant Berexco LLC ("Berexco") is a Kansas limited liability company which maintains its principal place of business in Wichita, Kansas, with a registered agent for service of process in the State of Oklahoma, namely: Peter Wilson, 2601 N.W. Expressway, Suite 1100E, Oklahoma City, Oklahoma 73112. At all times pertinent, Berexco owned or operated one or

more disposal wells located in the State of Oklahoma, including Creek County, which caused or contributed to the earthquakes described in this Petition. Berexco is responsible for wastewater disposal injections within less than or around 15 miles of the earthquake epicenters described in this Petition.

95. Defendant Cher Oil Company Limited ("Cher Oil") is an Oklahoma corporation which maintains its principal place of business in Ripley, Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: Richard O. Nossaman, 7317 South Ripley Road, Ripley, Oklahoma 74062. At all times pertinent, Cher Oil owned or operated one or more disposal wells located in the State of Oklahoma, including Payne County, which caused or contributed to the earthquakes described in this Petition. Cher Oil is responsible for at least 2% of the wastewater disposal injections within approximately 6 miles of the earthquake epicenters described in this Petition.

96. Defendant Chesapeake Operating, LLC ("Chesapeake") is a corporation existing and operating under the laws of the State of Oklahoma which maintains its principal place of business in Oklahoma with a registered agent for service of process in the State of Oklahoma, namely: The Corporation Company, 1833 S. Morgan Road, Oklahoma City, Oklahoma 73128. At all times pertinent, Chesapeake owned or operated one or more disposal wells located in the State of Oklahoma, including Payne County and Noble County, which caused or contributed to the earthquakes described in this Petition. Chesapeake is responsible for wastewater disposal injections under and around 30 miles of the earthquake epicenters described in this Petition.

97. Defendant Cimarron River Operating Corporation ("Cimarron") is an Oklahoma corporation which maintains its principal place of business in Mannford, Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: Harold E. Colpitt, Jr.,

101 South A Street, Oilton, Oklahoma 74052. At all times pertinent, Cimarron owned or operated one or more disposal wells located in the State of Oklahoma, including Creek County, which caused or contributed to the earthquakes described in this Petition. Cimarron is responsible for the wastewater disposal injections within approximately 15 miles of the earthquake epicenters described in this Petition.

98. Defendant Circle 9 Resources LLC ("Circle 9") is an Oklahoma limited liability company which maintains its principal place of business in Oklahoma City, Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: Jay Whipple, 2308 N.W. 54th Street, Oklahoma City, Oklahoma 73112. At all times pertinent, Circle 9 owned or operated one or more disposal wells located in the State of Oklahoma, including Payne County, which caused or contributed to the earthquakes described in this Petition. Circle 9 is responsible for the wastewater disposal injections within approximately 6 miles of the earthquake epicenters described in this Petition.

99. Defendant Crown Energy Company ("Crown Energy") is an Oklahoma corporation which maintains its principal place of business in Oklahoma City, Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: Randall D. Holleyman, 1117 N.W. 24th Street, Oklahoma City, Oklahoma 73106. At all times pertinent, Crown Energy owned or operated one or more disposal wells located in the State of Oklahoma, including Payne county, which caused or contributed to the earthquakes described in this Petition. Crown Energy is responsible for about 6% of the wastewater disposal injections within approximately 6 miles of the earthquake epicenters described in this Petition.

100. Defendant Equal Energy US Inc. ("Equal Energy") is an Oklahoma corporation which maintains its principal place of business in Tulsa, Oklahoma, with a registered agent for

service of process in the State of Oklahoma, namely: The Corporation Company, 1833 S. Morgan Road, Oklahoma City, Oklahoma 73128. At all times pertinent, Equal Energy owned or operated one or more disposal wells in the State of Oklahoma, including Lincoln County, which caused or contributed to the earthquakes described in this Petition. Equal Energy is responsible for wastewater disposal injections within approximately 15 miles of the earthquake epicenters described in this Petition.

101. Defendant FHA Investments LLC (“FHA Investments”) is an Oklahoma limited liability company which maintains its principal place of business in Cushing, Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: Ahrberg Milling of Cushing Incorporated, 200 S. Depot Avenue, Cushing, Oklahoma 74023. At all times pertinent, FHA Investments owned or operated one or more disposal wells in the State of Oklahoma, including Payne County, which caused or contributed to the earthquakes described in this Petition. FHA is responsible for about 7% of the wastewater disposal injections within approximately 6 miles of the earthquake epicenters described in this petition.

102. Defendant International Energy Corporation (“International Energy”) is an Oklahoma corporation which maintains its principal place of business in Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: International Energy Corporation, 1801 East 71st St., Tulsa, Oklahoma 74136. At all times pertinent, International Energy owned or operated one or more disposal wells in the State of Oklahoma, including Creek County, which caused or contributed to the earthquakes described in this Petition. International Energy is responsible for wastewater disposal injections within approximately 30 miles of the earthquake epicenters in this Petition.

103. Defendant Koby Oil Company LLC (“Koby Oil”) is an Oklahoma limited liability company which maintains its principal place of business in Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: Larry Hays, 5319 West 19th Avenue, Stillwater, Oklahoma 74074. At all times pertinent, Koby Oil owned or operated one or more disposal wells in the State of Oklahoma, including Creek County and Noble County, which caused or contributed to the earthquakes described in this Petition. Koby Oil is responsible for wastewater disposal injections within approximately 15 miles of the earthquake epicenters described in this Petition.

104. Defendant Marjo Operating Mid-Continent LLC (“Marjo”) is an Oklahoma limited liability company which maintains its principal place of business in Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: W. Deke Canada, 320 South Boston Avenue, Suite 200, Tulsa, Oklahoma 74103. At all times pertinent, Marjo owned or operated one or more disposal wells in the State of Oklahoma, including the County of Payne, Lincoln, Logan, and Noble, which caused or contributed to the earthquakes described in this Petition. Marjo is responsible for wastewater disposal injections within approximately 30 miles of the earthquake epicenters described in this Petition.

105. Defendant Mid-Con Energy Operating LLC (“Mid-Con”) is an Oklahoma limited liability company which maintains its principal place of business in Tulsa, Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: Charles L. McLawhorn, III., 2341 East 61st Street, Suite 850, Tulsa, Oklahoma 74136. At all times pertinent, Mid-Con owned or operated one or more disposal wells in the State of Oklahoma, including Creek County, which caused or contributed to the induced earthquakes described in

this Petition. Mid-Con is responsible for the wastewater disposal injections within approximately 15 miles of the earthquake epicenters described in this Petition.

106. Defendant Montclair Energy LLC ("Montclair") is a foreign limited liability company organized under the state laws of Alabama with a registered agent for service of process in the State of Oklahoma, namely: Jeanine Greene, 1800 Canyon Park Circle, No. 405, Edmond, Oklahoma 73013. At all times pertinent, Montclair owned or operated one or more disposal wells in the State of Oklahoma, including Lincoln County, which caused or contributed to the earthquakes described in this Petition. Montclair is responsible for the wastewater disposal injections within approximately 30 miles of the earthquake epicenters described in this Petition.

107. Defendant Oakland Petroleum Operating Company Incorporated ("Oakland Petroleum") is an Oklahoma corporation which maintains its principal place of business in Tulsa, Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: Richard L. Harris, 1800 South Baltimore, Suite 900, Tulsa, Oklahoma 74104. At all times pertinent, Oakland Petroleum owned or operated one or more disposal wells in the State of Oklahoma, including Creek County, which caused or contributed to the earthquakes described in this Petition. Oakland Petroleum is responsible for the wastewater disposal injections within approximately 15 miles of the earthquake epicenters described in this Petition.

108. Defendant Orca Operating Company LLC ("Orca") is an Oklahoma corporation which maintains its principal place of business in Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: Orca Resources, LLC, 427 S. Boston Avenue, Suite 929, Tulsa, Oklahoma 74114. At all times pertinent, Orca owned or operated one or more disposal wells in the State of Oklahoma, including Lincoln County, which caused or contributed

to the earthquakes described in this Petition. Orca is responsible for the wastewater disposal injections within approximately 20 miles of the earthquake epicenters described in this Petition.

109. Defendant Petco Petroleum Corporation ("Petco") is an Illinois corporation with a registered agent for service of process in the State of Oklahoma, namely: Corporation Service Company, 10300 Greenbriar Place, Oklahoma City, Oklahoma 73159. At all times pertinent, Petco owned or operated one or more disposal wells in the State of Oklahoma, including Creek County, which caused or contributed to the earthquakes described in this Petition. Petco is responsible for the wastewater disposal injections within approximately 15 miles of the earthquake epicenters described in this Petition.

110. Defendant Petro Warrior LLC ("Petro Warrior") is an Oklahoma limited liability company which maintains its principal place of business in Stillwater, Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: Gary B. Larue, 4599 North Washington, Apt. 371, Stillwater, Oklahoma 74075. At all times pertinent, Petro Warrior owned or operated one or more disposal wells in the State of Oklahoma, including Lincoln County, which caused or contributed to the earthquakes described in this Petition. Petro Warrior is responsible for about 3% of the wastewater disposal injections within approximately 10 miles of the earthquake epicenters described in this Petition.

111. Defendant Range Production Company LLC ("Range Production") is a Delaware corporation with a registered agent for service of process in the State of Oklahoma, namely: Corporation Service company, 10300 Greenbriar Place, Oklahoma City, Oklahoma 73159-7653. At all times pertinent, Range Production owned or operated one or more disposal wells in the State of Oklahoma, including Noble County, which caused or contributed to the earthquakes

described in this Petition. Range Production is responsible for the wastewater disposal injections within approximately 20 miles of the earthquake epicenters described in this Petition.

112. Defendant Special Energy Corporation ("Special Energy") is a Texas corporation, with a registered agent for service of process in the State of Oklahoma, namely: John F. Special, 4815 South Perkins Road, Stillwater, Oklahoma 74074. At all times pertinent, Special Energy owned or operated one or more disposal wells in the State of Oklahoma, including Payne, Pawnee, Logan, and Lincoln Counties, which caused or contributed to the earthquakes described in this Petition. Special Energy is responsible for the wastewater disposal injections within approximately 20 miles of the earthquake epicenters described in this Petition.

113. Defendant Shields Operating Incorporated ("Shields") is an Arkansas corporation which maintains its principal place of business in Fort Smith, Arkansas, with a registered agent for service of process in the State of Oklahoma, namely: John F. Shields, 411 West Waterloo Road, Edmond, Oklahoma 73025. At all times pertinent, Shields owned or operated one or more disposal wells in the State of Oklahoma, including Payne County, which caused or contributed to the earthquakes described in this Petition. Shields is responsible for the wastewater disposal injections within approximately 15 miles of the earthquake epicenters described in this Petition.

114. Defendant Tarka Energy LLC ("Tarka Energy") is a Delaware limited liability company which maintains its principal place of business in 5, Rosier, 19N, Range 6 of the East Meridian, Payne County, Oklahoma with a registered agent for service of process in the State of Oklahoma, namely: The Corporation Company, 1833 South Morgan Road, Oklahoma City, Oklahoma 73128. At all times pertinent, Tarka Energy owned or operated one or more disposal wells in the State of Oklahoma, including Pawnee County, which caused or contributed to the

earthquakes described in this Petition. Tarka Energy is responsible for wastewater disposal injections within approximately 15 miles of the earthquake epicenters described in this Petition.

115. Defendant Territory Resources LLC ("Territory Resources") is an Oklahoma limited liability company which maintains its principal place of business in Tulsa, Oklahoma, with a registered agent for service of process in the State of Oklahoma, namely: Crowe & Dunlevy, A Professional Corporation, Attention: James H. Holloman, Jr., 324 North Robinson Avenue, Suite 100, Oklahoma City, Oklahoma 73102. At all times pertinent, Territory Resources owned or operated one or more disposal wells in the State of Oklahoma, including Noble County, which caused or contributed to the earthquakes described in this Petition. Territory Resources is responsible for wastewater disposal injections within approximately 25 miles of the earthquake epicenters described in this petition.

116. Defendant White Star Petroleum LLC ("White Star") is an Oklahoma limited liability company which maintains its principal place of business at 30 Northwest 63rd Street, Oklahoma City, Oklahoma 73118. At all times pertinent, White Star owned or operated one or more disposal wells in the State of Oklahoma, including Payne County, which caused or contributed to the earthquakes described in this Petition. White Star is responsible for about 82% of the wastewater disposal injections within approximately 6 miles of the earthquake epicenters described in this Petition.

117. John Does 1 – 25 are other Oklahoma oil and gas companies that have engaged in injection well operations in and around Payne County, Oklahoma, which have also contributed to the earthquakes and resulting damages to Plaintiffs.

III. JURISDICTION AND VENUE

118. Jurisdiction in this Court is proper. This Court has personal jurisdiction over the Defendants as they do substantial business in the State of Oklahoma and operate wastewater disposal wells in or around this judicial district.

119. Venue is proper in this Court as a substantial part of the events or omissions giving rise to the claims set forth in this Petition occurred here.

120. Venue is proper in this Court as the Oklahoma Corporation Commission (“OCC”) does not have jurisdiction over the property damage claims asserted in this Petition. *Ladra v. New Dominion, et al.*, 2015 OK 53, 353 P.3d 529 (2015).

IV. FACTUAL ALLEGATIONS

121. In recent years, thousands of earthquakes have occurred in Oklahoma, including in and around Tulsa County.

122. In fact, Oklahoma is now one of the most seismically active state in the continental United States.

123. Since at least 2013, independent scientists, as well as members of the United States Geological Survey, the Oklahoma Geological Survey, and the Oklahoma Corporation Commission, have identified as the direct cause of the increased number, frequency, and severity of Oklahoma’s earthquakes to the injection/disposal of contaminates, hazardous fluids produced from oil and gas production, into wastewater disposal wells located in the Arbuckle or lower units. This process causes earthquakes; and, indeed, has caused most of the earthquakes shaking Oklahoma since at least 2011, including earthquakes with epicenters near and around Tulsa County.

124. In fact, the number of earthquakes in Oklahoma has increased more than 300 fold, from a maximum of 167 before 2009 to 5,838 in 2015.

125. As the number of earthquakes has increased, so has their severity. For example, prior to 2008, Oklahoma experienced an earthquake of magnitude 3.5 or greater about once every 20 years. In 2015 alone, Oklahoma experienced over 220 earthquakes of magnitude 3.5 or greater.

126. Although alternative methods for the disposing of contaminants and hazardous fluids produced from oil and gas production exist, Defendants continue to dispose/inject said fluids into wastewater disposal wells for their own pecuniary benefit. This is still done by defendants even though it is well known that there are injection zones available in Oklahoma that do not cause earthquakes as a result of fluids disposal and injection.

127. These waste-induced earthquakes have toppled historic towers, caused parts of houses to fall and injure people, cracked basements, and shattered nerves, as people fear there could be worse to come.

128. On March 28, 2016, and revised on June 17, 2016, the United States Geological Survey ("USGS") published a study quantifying these risks. It found that the earthquake risks in Oklahoma have risen rapidly as a result of deep disposal of production wastes. Oklahoma earthquake risks are now the highest in the nation. Maps included in the report show a broad swathe of the State of Oklahoma has a 5 to 12% likelihood of a highly damaging earthquake in the next year. Petersen, M.D., Mueller, C.S., Moschetti, M.P., Hoover, S.M., Llenos, A.L., Ellsworth, W.L., Michael, A.J., Rubenstein, J.L., McGarr, A.F., and Rukstales, K.S., 2016, 2016 One-Year Seismic Hazard Forecast for the Central and Eastern United States from Induced and Natural Earthquakes: U.S. Geological Survey Open-File Report, 2016-1031,52.

129. On September 1, 2016, these scientists' prediction, that a more damaging earthquake to Oklahoma was coming, proved to be true.

130. On that day, a magnitude 5.8 earthquake shattered Pawnee, Oklahoma. The earthquake's epicenter was located three (3) kilometers west of Cushing, Oklahoma. This earthquake was the largest one that had ever hit Oklahoma and is just one example of the seismic activity that occurs on a daily basis, causing ongoing damage to Plaintiffs.

131. All segments of Oklahoma's government, from the Governor to the Director of OGS, agree that the earthquakes plaguing this area are induced by Defendants' wastewater disposal operations.

132. The 5.8 magnitude earthquake near Pawnee on September 3, 2016, and others like it are not a naturally occurring earthquakes, or an act of God.

133. Then on November 6, 2016, and as predicted by scientists, a magnitude 5.0 earthquake struck near Cushing, Oklahoma.

134. This earthquake, like so many others, was man made and caused by wastewater injection into disposal wells. Further, all segments of Oklahoma's government agree that this seismicity was caused by Defendants' wastewater disposal operations near and around the epicenter of said earthquakes.

135. As a direct and proximate cause of Defendants' conduct, Plaintiffs' personal and real property suffered greatly. As mentioned *supra* All Plaintiffs' damages to the real and personal property were due to the earthquakes caused by Defendants' wastewater disposal operations.

V. CAUSES OF ACTION

COUNT ONE – ABSOLUTE LIABILITY

136. Plaintiffs hereby re-allege and incorporate the foregoing paragraphs as if fully set forth herein.

137. As described herein this Petition, Defendants' actions are ultrahazardous activities that necessarily involve a risk of serious harm to a person that cannot be eliminated by the exercise of the utmost care and is not a matter of common usage.

138. As a direct and proximate result of Defendants' ultrahazardous activities, Plaintiffs have suffered damages to their personal and real property, to which Defendants are strictly liable.

139. As a direct and proximate result of Defendants' ultrahazardous activities, Plaintiffs have suffered damages to their property in the form of:

- i. Damage to and loss of property, including damage to land, home, and personal property;
- ii. Damage and interference with use and enjoyment of property;
- iii. Diminution and loss of market value;
- iv. Economic expenses incurred to protect against earthquakes in the future, including additional structural support and repairs to real property, and premiums for earthquake insurance and related appraisals; and
- v. Emotional damages.

COUNT TWO – NEGLIGENCE

140. Plaintiffs hereby re-allege and incorporate the foregoing paragraphs, as if fully set forth herein.

141. Plaintiffs have a right to use their property free from disturbance or diminution of value.

142. Defendants are sophisticated business entities with specialized knowledge in oil and gas operations and wastewater disposal practices.

143. Defendants owed a duty to Plaintiffs to use ordinary care not to operate or maintain their injection wells in such a way to cause or contribute to seismic activity. Defendants, experienced in these operations, knew or should have known of the connection between wastewater disposal/injection wells and seismic activity, and acted in disregard of these facts.

144. Defendants breached their duty to Plaintiffs and the putative Class to use ordinary care and not to operate or maintain their injection wells in such a way to cause or contribute to an increase in seismic activity.

145. As a direct result of these actions, breach, and fault of the Defendants, Plaintiffs and their property have suffered injuries that were foreseeable to the Defendants.

146. Damages suffered by the Plaintiffs due to the operations, acts and/or omissions of Defendants include:

- i. Damages to and loss of property, including damage to land, home, and personal property;
- ii. Damage and interference with use and enjoyment of property;
- iii. Diminution and loss of market value; and
- iv. Emotional damages.

COUNT THREE – GROSS NEGLIGENCE

147. Plaintiffs hereby re-allege and incorporate the foregoing Paragraphs, as if fully set forth herein.

148. As alleged herein this Petition, Defendants knew or should have known of the connection between the disposal of wastewater via disposal/injection wells and a subsequent increase in earthquakes.

149. Defendants' operations constitute a pattern of negligence that caused the harm to Plaintiffs.

150. As described above, Defendants' operations, acts, and/or omissions indicate a conscious and intentional indifference for the consequence of their acts and/or a reckless disregard for the safety of others.

151. Defendants, sophisticated business entities with decades of experience in oil and gas operations, exhibited a want of slight care and diligence in their operations, acts and/or omissions by the continued disposal of wastewater via wastewater injection wells.

152. Damages suffered by the Plaintiffs due to the operations, acts, and/or omissions of Defendants include:

- i. Damage to and loss of property, including damage to land, home, and personal property;
- ii. Damage and interference with use and enjoyment of property;
- iii. Diminution and loss of market value; and
- iv. Emotional damages.

COUNT FOUR – PRIVATE NUISANCE

153. Plaintiffs hereby re-allege and incorporate the foregoing Paragraphs as if fully set forth herein.

154. Plaintiffs possess property rights to their land, homes and businesses.

155. Defendants by their continuous acts, conduct, and/or omissions as alleged herein this Petition, have unlawfully and unreasonably interfered with those rights, privileges, and Plaintiffs' use and enjoyment of their property.

156. As a result, Plaintiffs have suffered damages to their property, home, and businesses because of Defendants' creation of a nuisance, including:

- i. Damage to and loss of property including damage to land, home, personal property, and businesses;
- ii. Damage and interference with use and enjoyment of property;
- iii. Diminution and loss of market value; and
- iv. Emotional damages.

COUNT FIVE – PUBLIC NUISANCE

157. Plaintiffs hereby re-allege and incorporate the foregoing Paragraphs as if fully set forth herein.

158. Plaintiffs have suffered damages and injuries due to earthquakes in and around Tulsa County and Plaintiffs' property.

159. As set forth fully above, Defendants' actions and operations have created earthquakes which caused ground shaking on Plaintiffs' property of sufficient magnitude to cause damage.

160. As property owners that have rights to the use and enjoyment of their property, Plaintiffs have suffered damages that are different from that of non-property owners.

161. A public nuisance is one which affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of the annoyance or damage inflicted upon the individuals may be unequal.

162. In this case, Plaintiffs have suffered from the public nuisance, the earthquakes, and has standing to bring an action for public nuisance, as Plaintiffs have suffered damages that are greater and different in kind than persons that do not own property.

- i. Damages suffered by the Plaintiffs include:
- ii. Damage to and loss of property, including damage to land, home, personal property, and businesses;
- iii. Damage and interference with use and enjoyment of property;
- iv. Diminution and loss of market value; and
- v. Emotional damages.

COUNT SIX – TRESPASS

163. Plaintiffs re-allege and incorporate the foregoing Paragraphs as if set forth herein.

164. Plaintiffs are and have been lawfully entitled to possession of their property.

165. Defendants, without the permission or consent of Plaintiffs and without legal right, intentionally engaged in activities that resulted in concussions or vibrations entering Plaintiffs' property. Such unauthorized invasion of Plaintiffs' property constitutes a trespass.

166. Because of the trespasses by Defendants, Plaintiffs have suffered damages, including:

- i. Damage to and loss of property, including damage to land, homes, personal property, and businesses.
- ii. Damage and interference with use and enjoyment of property;
- iii. Diminution and loss of market and value; and
- iv. Emotional damages.

VI. PUNITIVE DAMAGES

167. The Defendants' actions, in knowingly causing seismic activity as a result of their wastewater injection well operations, constitute intentional, wanton or reckless disregard for public or private safety, and are thus subject to a claim for punitive damages, for which Plaintiffs and the Class seek in an amount sufficient to punish the Defendants and to deter them from such conduct in the future.

VII. DEMAND FOR A JURY TRIAL

168. Plaintiffs respectfully request a jury trial.

PRAYER FOR RELIEF

Wherefore, Plaintiffs respectfully pray:

- a. For a judgment awarding Plaintiffs judgment;
- b. Damages for Plaintiffs' claims in an amount in excess of \$75,000.00;
- c. Punitive Damages;
- d. Awarding attorneys' fees, expenses, and costs;
- e. Pre and post judgment interest; and
- f. For all relief to which Plaintiffs may be entitled to and which the Court deems proper.

RESPECTFULLY SUBMITTED this 17th day of December, 2018.



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JURY TRIAL DEMANDED

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