



IN THE DISTRICT COURT OF CLEVELAND COUNTY, OKLAHOMA

ADAM BURT, ERIN BURT; ALLEN BURKE;
ALVINA WILKS; AMERIC LEEVIRAPHAN,
SUZANNE LEEVIRAPHAN; ARVIL E.
SMALLWOOD, VICKI SMALLWOOD; BARRON
WINTERS, MISTIE WINTERS; BRAD K HARBER;
BRADLEY CASPER; BRENTON JAYNES, KRISTY
JAYNES; CALI HERNANDEZ, JORDAN
HERNANDEZ; CLAYTON ADAMS; DALE
CHEATHAM; DARREN PETERS; DAVID H.
LEVAN, PAULA LEVAN; DEBORA GAMM,
ROBERT ALEXANDER SR; DEBRA BRENNAN;
DELORES JACKSON, JAMES JACKSON; DIANA
PIERRE; EDWARD C. LORENZEN; EILEEN B.
CABALLERO; EMILY BUCHANAN, NATHAN
BUCHANAN; GARY JONES, RITA D. JONES;
GARY STEVEN PISTOLE; GAYLE CASKEY,
HAROLD CASKEY; GRACE J DOTSON; GREG
VOLLMER; GROVER TURNER; JAMES COOKE;
JAMES DOUGLAS STAFFORD, LISA STAFFORD;
JAMES E. HORN, JANET HORN; JAMES L.
PENDLEY SR., JEANETTE PENDLEY; JAMES
WALLACE, PAM WALLACE, SHIRLEY CHESSEY;
JANE LOUISE ANDERSON; JASON G. HENSON;
JERRY MCGEE, MEGHAN MCGEE; JONATHAN
W. T. LEWIS, LISA LEWIS; JORDAN
BRESHEARS; JOSE LUIS BOSQUEZ, MARIA
DIAZ-BOSQUEZ; JUSTIN R BARKER; KEITH
DOUGHERTY, TAMMY B. DOUGHERTY; KEITH
H. FINLEY; KELLY KEY, MICHAEL KEY;
KRISTY JAYNES, LARRY JAYNES; LELAND
ANNESLEY; LINDA HASKELL, RICHARD
HASKELL; LISA BIRDWELL, RICKY BIRDWELL;
LISA WOLF, WILLIAM WOLF; LYNDALL
YOUNG; MARCA LEA BENNETT, MARCA
BENNETT; MARGARET REEVES; MARIECA
PILCHER, WILLIAM (BILL) GARDNER; MARSHA
K. SANDERS; MISTY DAWN PRITCHARD;
MITCHELL C ELMORE; MOHAMMAD RAHIMI;
NANCY R. MAXEY; NELSON JACK HAYES,
PAMELA GAIL HAYES; OSCAR C. SMART SR.;
PATRICIA COLSON; PAUL CROWL, RAVEN
CROWL; RENE BUSS, SHANE BUSS; RL
MONTGOMERY; SHARON ANN BRUCE;
SHARON WOOD, WILLIAM WOOD;

CJ-2020-114

STATE OF OKLAHOMA } S.S.
CLEVELAND COUNTY }

FILED

JAN 27 2020

In the office of the
Court Clerk MARILYN WILLIAMS

SONIA VEGA; WILLIE C. WASHINGTON JR. and
WITMER DANIEL

Plaintiffs,

Case No. CJ-2020-114

NEW DOMINION, LLC

Defendant.

PLAINTIFFS' ORIGINAL PETITION

COME NOW Plaintiffs, ADAM BURT, ERIN BURT; ALLEN BURKE; ALVINA WILKS; AMERIC LEEVIRAPHAN, SUZANNE LEEVIRAPHAN; ARVIL E. SMALLWOOD, VICKI SMALLWOOD; BARRON WINTERS, MISTIE WINTERS; BRAD K HARBER; BRADLEY CASPER; BRENTON JAYNES, KRISTY JAYNES; CALI HERNANDEZ, JORDAN HERNANDEZ; CLAYTON ADAMS; DALE CHEATHAM; DARREN PETERS; DAVID H. LEVAN, PAULA LEVAN; DEBORA GAMM, ROBERT ALEXANDER SR; DEBRA BRENNAN; DELORES JACKSON, JAMES JACKSON; DIANA PIERRE; EDWARD C. LORENZEN; EILEEN B. CABALLERO; EMILY BUCHANAN, NATHAN BUCHANAN; GARY JONES, RITA D. JONES; GARY STEVEN PISTOLE; GAYLE CASKEY, HAROLD CASKEY; GRACE J DOTSON; GREG VOLLMER; GROVER TURNER; JAMES COOKE; JAMES DOUGLAS STAFFORD, LISA STAFFORD; JAMES E. HORN, JANET HORN; JAMES L. PENDLEY SR., JEANETTE PENDLEY; JAMES WALLACE, PAM WALLACE, SHIRLEY CHESSER; JANE LOUISE ANDERSON; JASON G. HENSON; JERRY MCGEE, MEGHAN MCGEE; JONATHAN W. T. LEWIS, LISA LEWIS; JORDAN BRESHEARS; JOSE LUIS BOSQUEZ, MARIA DIAZ-BOSQUEZ; JUSTIN R BARKER; KEITH DOUGHERTY, TAMMY B. DOUGHERTY; KEITH H. FINLEY; KELLY KEY, MICHAEL

KEY; KRISTY JAYNES, LARRY JAYNES; LELAND ANNESLEY; LINDA HASKELL, RICHARD HASKELL; LISA BIRDWELL, RICKY BIRDWELL; LISA WOLF, WILLIAM WOLF; LYNDALL YOUNG; MARCA LEA BENNETT, MARCA BENNETT; MARGARET REEVES; MARIECA PILCHER, WILLIAM (BILL) GARDNER; MARSHA K. SANDERS; MISTY DAWN PRITCHARD; MITCHELL C ELMORE; MOHAMMAD RAHIMI; NANCY R. MAXEY; NELSON JACK HAYES, PAMELA GAIL HAYES; OSCAR C. SMART SR.; PATRICIA COLSON; PAUL CROWL, RAVEN CROWL; RENE BUSS, SHANE BUSS; RL MONTGOMERY; SHARON ANN BRUCE; SHARON WOOD, WILLIAM WOOD; SONIA VEGA; WILLIE C. WASHINGTON JR. and WITMER DANIEL (“Plaintiffs”), citizens of Oklahoma and property owners in Oklahoma, who state the following causes of action against Defendant, NEW DOMINION, LLC, (“Defendant”):

I. GENERAL NATURE OF ACTION

1. This is a lawsuit brought by Oklahoma citizens and 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 produced water disposal wells in and around the State of Oklahoma. Plaintiffs exclusively bring state law claims and further, disavow any and all federal claims or ant claims requiring consideration of federal law.

2. Plaintiffs seek damages 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

3. At all times herein relevant, Plaintiff Adam Burt and Plaintiff Erin Burt were citizens of Oklahoma, property owners and residents of Norman, Cleveland County, Oklahoma. Plaintiffs' property is located at 1405 Morland Avenue, Norman, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

4. At all times herein relevant, Plaintiff Allen Burke was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 4408 Southeast 41st Street, Norman, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

5 At all times herein relevant, Plaintiff Alvina Wilks was a citizen of Oklahoma, property owner and resident of Moore, Cleveland County, Oklahoma. Plaintiff's property is located at 844 Northwest 14st, Moore, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

6. At all times herein relevant, Plaintiff Americ Leeviraphan and Plaintiff Suzanne Leeviraphan were citizens of Oklahoma, property owners and residents of Norman, Cleveland County, Oklahoma. Plaintiffs' property is located at 2909 Hanover Drive, Norman, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

7. At all times herein relevant, Plaintiff Arvil E. Smallwood and Plaintiff Vicki Smallwood were citizens of Oklahoma, property owners and residents of Norman, Cleveland County, Oklahoma. Plaintiffs' property is located at 375 Wilkenson Drive, Norman, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

8. At all times herein relevant, Plaintiff Barron Winters and Plaintiff Mistie Winters were citizens of Oklahoma, property owners and residents of Norman, Cleveland County, Oklahoma. Plaintiffs' property is located at 2129 Meridian Drive, Norman, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

9. At all times herein relevant, Plaintiff Brad K Harber was a citizen of Oklahoma, property owner and resident of Newalla, Cleveland County, Oklahoma. Plaintiffs' property is located at 15300 Hickory Ridge Road, Newalla, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

10. At all times herein relevant, Plaintiff Bradley Casper was a citizen of Oklahoma, property owner and resident of Oklahoma City, Cleveland County, Oklahoma. Plaintiff's property is located at 6501 SE 157th Place, Oklahoma City, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

11. At all times herein relevant, Plaintiff Brenton Jaynes and Plaintiff Kristy Jaynes were citizens of Oklahoma, property owners and residents of Noble, Cleveland County, Oklahoma. Plaintiffs' property is located at 8831 154th Street, Noble, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

12. At all times herein relevant, Plaintiff Cali Hernandez and Plaintiff Jordan Hernandez were citizens of Oklahoma, property owners and residents of Norman, Cleveland County, Oklahoma. Plaintiffs' property is located at 10519 Dare Lane, Norman, Oklahoma.

Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

13. At all times herein relevant, Plaintiff Clayton Adams was a citizen of Oklahoma, property owner and resident of Oklahoma City, Cleveland County, Oklahoma. Plaintiff's property is located at 2309 SW 90th Street, Oklahoma City, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

14. At all times herein relevant, Plaintiff Dale Cheatham was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 116 1/2 Keith Street, Norman, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

15. At all times herein relevant, Plaintiff Darren Peters was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 103 W Mosier Street, Norman, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

16. At all times herein relevant, Plaintiff David H. LeVan and Plaintiff Paula LeVan were citizens of Oklahoma, property owners and residents of Cleveland, Cleveland County, Oklahoma. Plaintiffs' property is located at 686 East Garden Canyon Drive, Cleveland, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

17. At all times herein relevant, Plaintiff Debora Gamm and Plaintiff Robert Alexander, Sr. were citizens of Oklahoma, property owners and residents of Newalla, Cleveland County, Oklahoma. Plaintiffs' property is located at 13012 S Luther Road, Newalla, Oklahoma.

Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

18. At all times herein relevant, Plaintiff Debra Brennan was a citizen of Oklahoma, property owner and resident of Moore, Cleveland County, Oklahoma. Plaintiff's property is located at 2108 East Hills Drive, Moore, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

19. At all times herein relevant, Plaintiff Delores Jackson and Plaintiff James Jackson were citizens of Oklahoma, property owners and residents of Moore, Cleveland County, Oklahoma. Plaintiffs' property is located at 2525 NE Amber Street, Moore, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

20. At all times herein relevant, Plaintiff Diana Pierre was a citizen of Oklahoma, property owner and resident of Moore, Cleveland County, Oklahoma. Plaintiff's property is located at 1824 NE 1st, Moore, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

21. At all times herein relevant, Plaintiff Edward C. Lorenzen was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 1719 Quail Creek Drive. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

22. At all times herein relevant, Plaintiff Eileen B. Caballero was a citizen of Oklahoma, property owner and resident of the Oklahoma City, Cleveland County, Oklahoma. Plaintiff's property is located at 2116 Lakecrest Drive, Oklahoma City. Plaintiff's property

suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

23. At all times herein relevant, Plaintiff Emily Buchanan and Plaintiff Nathan Buchanan were citizens of Oklahoma, property owners and residents of Norman, Cleveland County, Oklahoma. Plaintiffs' property is located at 621 Sherwood Drive, Norman, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

24. At all times herein relevant, Plaintiff Gary Jones and Plaintiff Rita D. Jones were citizens of Oklahoma, property owners and residents of Moore, Cleveland County, Oklahoma. Plaintiffs' property is located at 1516 Sunrise, Moore, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

25. At all times herein relevant, Plaintiff Gary Steven Pistole was a citizen of Oklahoma, property owner and resident of Oklahoma City, Cleveland County, Oklahoma. Plaintiff's property is located at 12212 Rivendell Dr., Oklahoma City, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

26. At all times herein relevant, Plaintiff Gayle Caskey and Plaintiff Harold Caskey were citizens of Oklahoma, property owners and residents of Lexington, Cleveland County, Oklahoma. Said property is located at 14851 108th, Lexington, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

27. At all times herein relevant, Plaintiff Grace J Dotson was a citizen of Oklahoma, property owner and resident of Moore, Cleveland County, Oklahoma. Plaintiff's property is

located at 744 NW 1st Street, Moore, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

28. At all times herein relevant, Plaintiff Greg Vollmer was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 1624 Rolling Stone, Norman, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

29. At all times herein relevant, Plaintiff Grover Turner was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 1107 Woods Avenue, Norman, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

30. At all times herein relevant, Plaintiff James Cooke was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 1819 Creighton Court, Norman, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

31. At all times herein relevant, Plaintiff James Douglas Stafford and Plaintiff Lisa Stafford were citizens of Oklahoma, property owners and residents of Norman, Cleveland County, Oklahoma. Plaintiffs' property is located at 1605 Eagle Nest Drive. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

32. At all times herein relevant, Plaintiff James E. Horn and Plaintiff Janet Horn were citizens of Oklahoma, property owners and residents of Norman, Cleveland County, Oklahoma. Plaintiffs' property is located at 620 Chautauqua Avenue, Norman, Oklahoma. Plaintiffs'

property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

33. At all times herein relevant, Plaintiff James L. Pendley Sr. and Plaintiff Jeanette Pendley were citizens of Oklahoma, property owners and residents of Norman, Cleveland County, Oklahoma. Plaintiffs' property is located at 101 Eldorado Drive, Norman, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

34. At all times herein relevant, Plaintiff James Wallace, Plaintiff Pam Wallace and Plaintiff Shirley Chesser were citizens of Oklahoma, property owners and residents of Lexington, Cleveland County, Oklahoma. Plaintiffs' property is located at 16551 168th Street, Lexington, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

35. At all times herein relevant, Plaintiff Jane Louise Anderson was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 3617 Gilford Lane, Norman, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

36. At all times herein relevant, Plaintiff Jason G. Henson was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 15206 E State Highway 9, Norman, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

37. At all times herein relevant, Plaintiff Jerry McGee and Plaintiff Meghan McGee were citizens of Oklahoma, property owners and residents of Moore, Cleveland County, Oklahoma. Plaintiffs' property is located at 2617 Amber Street, Moore, Oklahoma. Plaintiffs'

property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

38. At all times herein relevant, Plaintiff Jonathan W. T. Lewis and Plaintiff Lisa Lewis were citizens of Oklahoma, property owners and residents of Moore, Cleveland County, Oklahoma. Plaintiffs' property is located at 2013 Sunset Drive, Moore, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

39. At all times herein relevant, Plaintiff Jordan Breshears was a citizen of Oklahoma, property owner and resident of Moore, Cleveland County, Oklahoma. Plaintiff's property is located at 1120 Price Drive, Moore, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

40. At all times herein relevant, Plaintiff Jose Luis Bosquez and Plaintiff Maria Diaz-Bosquez were citizens of Oklahoma, property owners and residents of Oklahoma City, Cleveland County, Oklahoma. Plaintiffs' property is located at 1313 Southwest 68th Street, Oklahoma City, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

41. At all times herein relevant, Plaintiff Justin R Barker was a citizen of Oklahoma, property owner and resident of Moore, Cleveland County, Oklahoma. Plaintiff's property is located at 752 SW 3rd Street, Moore, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

42. At all times herein relevant, Plaintiff Keith Dougherty and Plaintiff Tammy B. Dougherty were citizens of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiffs' property is located at 1916 Kiamichi Road, Norman, Oklahoma.

Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

43. At all times herein relevant, Plaintiff Keith H. Finley was a citizen of Oklahoma, property owner and resident of the Moore, Cleveland County, Oklahoma. Plaintiff's property is located at 3700 New London Ave, Moore, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

44. At all times herein relevant, Plaintiff Kelly Key and Plaintiff Michael Key were citizens of Oklahoma, property owners and residents of Noble, Cleveland County, Oklahoma. Plaintiffs' property is located at 300 Spring Road, Noble, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

45. At all times herein relevant, Plaintiff Kristy Jaynes and Plaintiff Larry Jaynes were citizens of Oklahoma, property owners and residents of Lexington, Cleveland County, Oklahoma. Plaintiffs' property is located at 8850 Bounbonais Creek Road, Lexington, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

46. At all times herein relevant, Plaintiff Leland Annesley was a citizen of Oklahoma, property owner and resident of Newalla, Cleveland County, Oklahoma. Plaintiff's property is located at 17800 Bob McDonald Road, Newalla, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

47. At all times herein relevant, Plaintiff Linda Haskell and Plaintiff Richard Haskell were citizens of Oklahoma, property owners and residents of Newalla, Cleveland County, Oklahoma. Plaintiffs' property is located at 19516 Newsom Road, Newalla, Oklahoma.

Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

48. At all times herein relevant, Plaintiff Lisa Birdwell and Plaintiff Ricky Birdwell were citizens of Oklahoma, property owners and residents of Norman, Cleveland County, Oklahoma. Plaintiffs' property is located at 4802 Wood Dale Avenue, Norman, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

49. At all times herein relevant, Plaintiff Lisa Wolf and Plaintiff William Wolf were citizens of Oklahoma, property owners and residents of Noble, Cleveland County, Oklahoma. Plaintiffs' property is located at 6325 168th Street, Noble, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

50. At all times herein relevant, Plaintiff Lyndall Young was a citizen of Oklahoma, property owner and resident of Oklahoma City, Cleveland County, Oklahoma. Plaintiff's property is located at 101 SW 174th Street, Oklahoma City, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

51. At all times herein relevant, Plaintiff Marca Lea Bennett and Plaintiff Marca Bennett were citizens of Oklahoma, property owners and residents of Norman, Cleveland County, Oklahoma. Plaintiffs' property is located at 1536 Woods Circle, Norman, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

52. At all times herein relevant, Plaintiff Margaret Reeves was a citizen of Oklahoma, property owner and resident of Moore, Cleveland County, Oklahoma. Plaintiff's property is located at 616 Emerwood Court, Moore, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

53. At all times herein relevant, Plaintiff Marieca Pilcher and Plaintiff William (Bill) Gardner were citizens of Oklahoma, property owners and residents Moore, Cleveland County, Oklahoma. Plaintiffs' property is located at 1110 Harrington Drive, Moore, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

54. At all times herein relevant, Plaintiff Marsha K. Sanders was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 11301 Reed Fern Lane, Norman, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

55. At all times herein relevant, Plaintiff Misty Dawn Pritchard was a citizen of Oklahoma, property owner and resident of Newalla, Cleveland County, Oklahoma. Plaintiff's property is located at 9217 Sleepy Hollow Drive, Newalla, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

56. At all times herein relevant, Plaintiff Mitchell C. Elmore was a citizen of Oklahoma, property owner and resident of Newalla, Cleveland County, Oklahoma. Plaintiff's property is located at 18200 SE 89th Street, Newalla, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

57. At all times herein relevant, Plaintiff Mohammad Rahimi was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 2305 W Lindsey Street, Norman, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

58. At all times herein relevant, Plaintiff Nancy R. Maxey was a citizen of Oklahoma, property owner and resident of Newalla, Cleveland County, Oklahoma. Plaintiff's property is located at 9301 Sleepy Hollow Drive, Newalla, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

59. At all times herein relevant, Plaintiff Nelson Jack Hayes and Plaintiff Pamela Gail Hayes were citizens of Oklahoma, property owners and residents of Oklahoma City, Cleveland County, Oklahoma. Plaintiffs' property is located at 11004 Creekvale Road, Oklahoma City, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

60. At all times herein relevant, Plaintiff Oscar C. Smart Sr. was a citizen of Oklahoma, property owner and resident of Moore, Cleveland County, Oklahoma. Plaintiff's property is located at 910 Southwest 1st Street, Moore, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

61. At all times herein relevant, Plaintiff Patricia Colson was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 2113 Creighton Drive, Norman, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

62. At all times herein relevant, Plaintiff Paul Cowl and Plaintiff Raven Cowl were citizens of Oklahoma, property owners and residents of Norman, Cleveland County, Oklahoma.

Plaintiffs' property is located at 321 North Peters Avenue, Norman, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

63. At all times herein relevant, Plaintiff Rene Buss and Plaintiff Shane Buss were citizens of Oklahoma, property owners and residents of Oklahoma City, Cleveland County, Oklahoma. Plaintiffs' property is located at 10132 Black Oaks Drive, Oklahoma City, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

64. At all times herein relevant, Plaintiff R.L. Montgomery was a citizen of Oklahoma, property owner and resident of Oklahoma City, Cleveland County, Oklahoma. Plaintiff's property is located at 36 Southwest 102nd Street, Oklahoma City, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

65. At all times herein relevant, Plaintiff Sharon Ann Bruce was a citizen of Oklahoma, property owner and resident of Moore, Cleveland County, Oklahoma. Plaintiff's property is located at 2508 Bellaire Drive, Moore, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

66. At all times herein relevant, Plaintiff Sharon Wood and Plaintiff William Wood were citizens of Oklahoma, property owners and residents of Moore, Cleveland County, Oklahoma. Plaintiffs' property is located at 1209 Northeast 3rd Street, Moore, Oklahoma. Plaintiffs' property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

67. At all times herein relevant, Plaintiff Sonia Vega was a citizen of Oklahoma, property owner and resident of Norman, Cleveland County, Oklahoma. Plaintiff's property is located at 2319 Parkland Way, Norman, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

68. At all times herein relevant, Plaintiff Willie C. Washington Jr. was a citizen of Oklahoma, property owner and resident of Oklahoma City, Cleveland County, Oklahoma. Said property is located at 12617 Lexington Drive, Oklahoma City, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

69. At all times herein relevant, Plaintiff Witmer Daniel was a citizen of Oklahoma, property owner and resident of Oklahoma City, Cleveland County, Oklahoma. Said property is located at 12604 Waterview Court, Oklahoma City, Oklahoma. Plaintiff's property suffered damages due to earthquakes caused by the Defendants' produced water disposal operations.

70. Defendant New Dominion, LLC is an Oklahoma limited liability company doing business in the State of Oklahoma, with its principal place of business at 1307 S. Boulder Avenue, Suite 400, Tulsa, Oklahoma 74119. Upon information and belief, one or more members of New Dominion, LLC is a citizen of Oklahoma.

III. TOLLING

71. Plaintiffs are members of a class certified against New Dominion in *Cooper v. New Dominion LLC, et al.*, Cleveland County District Court, Case No. CJ-2015-24, and their statutes of limitations have been tolled by operation of law.

IV. JURISDICTION AND VENUE

72. Jurisdiction in this Court is proper.

73. This Court also has personal jurisdiction over Defendants as they are citizens of Oklahoma, do substantial business in the State of Oklahoma and Oklahoma County, and further, operate the produced water disposal wells at issue within and nearby this judicial district.

74. Venue is proper in this Court as a substantial part of the events giving rise to this claim occurred here, and Plaintiffs are citizens of Oklahoma and residents of Logan County.

75. 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).

V. FACTUAL ALLEGATIONS

A. Background

76. During the course of the last decade, thousands of earthquakes have occurred in central Oklahoma.

77. In 2014, Oklahoma had more than twice the number of earthquakes as California, making it the most seismically active state in the continental United States for that year.

78. As discussed further below, independent scientists, the United States Geological Survey (“USGS”), the Oklahoma Geological Survey, and the Oklahoma Corporation Commission, have tied the increased number, frequency, and severity of these earthquakes in Oklahoma to the disposal of produced water related to fracking operations and other oil and gas productions, which the oil and gas industry uses to release trapped oil and gas.

79. The produced water generated from fracking is often disposed of by injection back into the earth under extreme pressure in what are usually called produced water disposal wells or injection wells.

80. The number of earthquakes in Oklahoma has increased from a few hundred per year before 2009 to 5,838 in 2015.

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

82. Alternative methods for the disposal of produced water exist, yet Defendant continued to inject produced water back into disposal wells for its own pecuniary benefit.

83. New Dominion and other members of the oil and gas industry have even issued public statements to deny the seismic problems they have created, and continue a mantra that their operations do not cause earthquakes.

B. The Actions of New Dominion that are the Subjects of this Proceeding

84. On or about November 5, 2011, an earthquake of 5.7 magnitude occurred near Prague and Meeker, Oklahoma, which was caused by New Dominion's operation of disposal wells nearby.

85. A 5.7 magnitude earthquake is substantial, and can cause substantial damage to people and property. An earthquake of this magnitude is also rarely seen in the United States east of the Rocky Mountains.

86. This earthquake is one of the largest in Oklahoma's history of recorded modern instruments.

87. This is also one of the largest earthquakes that scientists have linked to produced water disposal wells used by the oil and gas industry.

88. Together with the two other earthquakes of 5.0 magnitude occurring between November 5, 2011 and November 8, 2011, these three earthquakes destroyed many homes, damaged many other buildings, and further, injured people. These earthquakes also buckled pavement on streets and highways. The earthquakes caused these damages in numerous central Oklahoma counties, including specifically Pottawatomie County. Residents of St. Louis, nearly 500 miles away, even felt the effects of at least one of these earthquakes.

89. These three earthquakes occurring in November of 2011 caused substantial damage to Plaintiffs' properties identified herein.

90. New Dominion continued to operate produced water disposal wells in areas around Shawnee, and thus, also continued to cause earthquakes and further damages to Plaintiffs' properties.

91. In total, New Dominion caused 511 earthquakes from November of 2011 to present day in areas near Shawnee, and thus, caused further damages to Plaintiffs'. All of these earthquakes are subjects of this proceeding as they were caused by New Dominion and resulted in damages to Plaintiffs' properties:

mag	updated	place
2.53	2019-09-14T16:08:15.040Z	4km NNW of Stroud, Oklahoma
2.52	2019-09-14T16:08:10.040Z	4km NW of Stroud, Oklahoma
3.44	2019-09-06T14:25:04.040Z	5km N of Stroud, Oklahoma
2.6	2019-05-01T22:00:52.040Z	9km NNE of Harrah, Oklahoma
3.4	2019-05-02T18:06:50.676Z	8km NNE of Harrah, Oklahoma
2.6	2019-01-30T18:36:20.040Z	12km NW of Chandler, Oklahoma
2.6	2018-12-21T21:15:48.040Z	10km S of Boley, Oklahoma
3.6	2018-12-21T21:15:48.040Z	10km E of Luther, Oklahoma
2.5	2018-09-21T16:25:57.040Z	3km ESE of Luther, Oklahoma
2.8	2018-08-28T16:28:47.040Z	9km WNW of Prague, Oklahoma
2.5	2018-08-15T19:47:00.040Z	4km N of Harrah, Oklahoma
2.5	2018-05-15T06:29:08.040Z	13km NW of Chandler, Oklahoma
2.6	2018-05-03T22:15:08.040Z	3km ESE of Luther, Oklahoma
2.7	2018-04-20T07:05:35.040Z	3km E of Luther, Oklahoma

2.7	2018-04-20T07:05:29.040Z	2km E of Luther, Oklahoma
3.7	2018-04-22T09:06:25.875Z	6km ESE of McLoud, Oklahoma
3	2018-03-06T00:49:42.040Z	12km NW of Chandler, Oklahoma
2.9	2018-02-28T02:32:28.040Z	3km E of Luther, Oklahoma
2.6	2018-02-20T09:06:10.040Z	6km ESE of McLoud, Oklahoma
2.5	2018-02-14T02:01:11.040Z	3km NW of Shawnee, Oklahoma
2.5	2018-01-17T21:50:33.040Z	6km ESE of McLoud, Oklahoma
3	2017-12-19T01:54:07.040Z	9km NNW of Prague, Oklahoma
2.5	2017-12-19T01:54:03.040Z	13km NW of Chandler, Oklahoma
3.5	2017-12-19T01:54:02.040Z	13km NW of Chandler, Oklahoma
2.5	2017-12-13T02:29:37.040Z	9km NNW of Prague, Oklahoma
3.6	2017-12-13T02:29:37.040Z	9km NNW of Prague, Oklahoma
2.8	2017-11-14T01:42:15.040Z	0km W of Harrah, Oklahoma
2.6	2017-10-18T01:54:17.040Z	2km E of Luther, Oklahoma
2.9	2017-10-14T00:19:41.040Z	5km N of Stroud, Oklahoma
3.3	2017-10-11T01:04:01.040Z	5km N of Stroud, Oklahoma
2.5	2017-10-06T23:56:15.040Z	8km SSE of Luther, Oklahoma
2.6	2017-10-03T00:47:48.040Z	13km NW of Chandler, Oklahoma
2.6	2017-09-27T02:03:15.040Z	4km N of Stroud, Oklahoma
2.5	2017-08-23T16:35:46.040Z	9km NE of McLoud, Oklahoma
3	2017-08-23T16:35:45.040Z	9km S of Chandler, Oklahoma
2.5	2017-08-18T23:13:32.040Z	3km NNW of Seminole, Oklahoma
2.7	2017-08-16T02:42:15.040Z	5km N of Stroud, Oklahoma
2.7	2017-08-05T03:32:12.040Z	2km ESE of Luther, Oklahoma
3.2	2017-08-05T03:32:07.040Z	9km S of Chandler, Oklahoma
2.5	2017-07-21T02:32:10.040Z	5km N of Stroud, Oklahoma
3	2017-07-21T02:32:09.040Z	5km N of Stroud, Oklahoma
3.1	2017-06-12T19:46:55.040Z	8km NNE of Luther, Oklahoma
2.6	2017-06-07T00:33:38.040Z	5km N of Stroud, Oklahoma
2.5	2017-05-31T01:58:59.040Z	9km NW of Prague, Oklahoma
2.5	2017-05-31T01:58:54.040Z	10km N of Meeker, Oklahoma
2.7	2017-05-24T02:48:15.040Z	5km N of Stroud, Oklahoma
2.7	2017-05-09T01:24:34.040Z	10km NNE of Luther, Oklahoma
3	2017-04-19T18:30:58.040Z	4km SSE of Luther, Oklahoma
2.6	2017-03-09T02:14:27.040Z	3km SE of Harrah, Oklahoma
2.6	2017-03-09T02:14:25.040Z	4km SE of Harrah, Oklahoma
2.5	2017-02-15T23:21:30.040Z	3km E of Luther, Oklahoma
2.6	2017-02-09T03:02:28.040Z	17km NNE of Luther, Oklahoma
2.5	2017-02-09T03:02:19.040Z	11km ENE of Luther, Oklahoma
3.3	2017-02-09T03:02:19.040Z	11km ENE of Luther, Oklahoma
2.9	2017-01-24T02:02:13.040Z	2km E of Luther, Oklahoma
2.7	2017-01-24T02:02:06.040Z	3km E of Luther, Oklahoma

3.6	2017-01-20T00:31:09.040Z	3km E of Luther, Oklahoma
2.6	2017-01-20T00:31:01.040Z	3km E of Luther, Oklahoma
2.8	2017-01-03T21:10:46.040Z	15km NNE of Luther, Oklahoma
2.7	2017-01-03T21:10:38.040Z	4km E of Luther, Oklahoma
2.6	2016-12-12T23:01:27.040Z	5km WNW of Tecumseh, Oklahoma
2.6	2016-12-12T23:01:25.040Z	17km NE of Seminole, Oklahoma
2.6	2016-12-03T02:54:46.040Z	8km NW of Prague, Oklahoma
3.4	2016-12-03T02:54:36.040Z	4km E of Luther, Oklahoma
2.7	2016-11-19T04:58:32.040Z	9km E of Luther, Oklahoma
2.8	2016-11-15T02:21:52.040Z	9km E of Luther, Oklahoma
2.5	2016-11-15T02:21:52.040Z	9km E of Luther, Oklahoma
2.6	2016-11-15T02:21:52.040Z	10km E of Luther, Oklahoma
2.8	2016-11-15T02:21:52.040Z	9km E of Luther, Oklahoma
4	2016-11-15T02:21:52.040Z	10km E of Luther, Oklahoma
3.3	2016-11-15T02:21:50.040Z	3km E of Luther, Oklahoma
2.5	2016-10-26T03:10:26.040Z	6km NE of Harrah, Oklahoma
2.7	2016-09-24T22:47:20.040Z	11km NE of Chandler, Oklahoma
2.6	2016-09-24T22:47:19.040Z	3km E of Luther, Oklahoma
2.7	2016-09-08T01:50:28.040Z	7km W of Meeker, Oklahoma
2.6	2016-09-08T01:50:24.040Z	3km E of Luther, Oklahoma
2.5	2016-09-08T01:50:22.040Z	3km E of Luther, Oklahoma
2.8	2016-09-08T01:50:22.040Z	4km E of Luther, Oklahoma
2.8	2016-09-02T21:36:41.040Z	13km NW of Chandler, Oklahoma
2.9	2016-09-02T21:36:37.040Z	12km ESE of Luther, Oklahoma
2.9	2016-09-02T21:36:36.040Z	3km E of Luther, Oklahoma
2.7	2016-08-31T03:08:21.040Z	7km NNE of Luther, Oklahoma
2.5	2016-08-31T03:08:14.040Z	7km WSW of Meeker, Oklahoma
3.6	2016-08-27T02:15:28.040Z	6km NE of Harrah, Oklahoma
3.3	2016-08-10T22:30:29.040Z	3km ESE of Luther, Oklahoma
2.6	2016-08-10T22:30:28.040Z	2km ENE of Luther, Oklahoma
2.7	2016-08-03T22:33:45.040Z	7km NNE of Luther, Oklahoma
3.3	2016-08-03T22:33:45.040Z	7km NNE of Luther, Oklahoma
3.1	2016-07-22T19:39:09.040Z	3km E of Luther, Oklahoma
3.4	2016-07-22T19:39:07.040Z	2km E of Luther, Oklahoma
2.6	2016-07-22T19:39:07.040Z	2km E of Luther, Oklahoma
2.5	2016-07-22T19:39:06.040Z	16km NW of Chandler, Oklahoma
2.5	2016-07-20T18:10:51.040Z	12km S of Boley, Oklahoma
2.6	2016-07-19T20:03:12.040Z	2km E of Luther, Oklahoma
2.7	2016-07-19T20:03:10.040Z	7km NNE of Luther, Oklahoma
3.1	2016-07-19T20:03:10.040Z	7km NNE of Luther, Oklahoma
2.7	2016-07-19T20:03:09.040Z	7km NNE of Luther, Oklahoma
2.6	2016-07-19T20:03:07.040Z	8km NNE of Luther, Oklahoma

2.7	2016-07-19T20:03:06.040Z	7km NNE of Luther, Oklahoma
3.4	2016-07-19T20:03:06.040Z	7km NNE of Luther, Oklahoma
3.4	2016-07-19T20:03:05.040Z	8km NNE of Luther, Oklahoma
3	2016-07-19T20:03:05.040Z	9km WNW of Prague, Oklahoma
3	2016-07-08T02:49:26.040Z	8km NNE of Luther, Oklahoma
2.9	2016-07-08T02:49:26.040Z	8km NNE of Luther, Oklahoma
2.7	2016-07-08T02:49:26.040Z	7km NNE of Luther, Oklahoma
2.9	2016-07-08T02:49:26.040Z	7km NNE of Luther, Oklahoma
2.9	2016-07-08T02:49:25.040Z	7km ENE of Harrah, Oklahoma
3	2016-07-08T02:49:25.040Z	7km ENE of Harrah, Oklahoma
2.8	2016-07-08T02:49:25.040Z	7km ENE of Harrah, Oklahoma
2.9	2016-07-08T02:49:24.040Z	7km NNE of Luther, Oklahoma
3.6	2016-07-08T02:49:24.040Z	7km NNE of Luther, Oklahoma
2.8	2016-07-08T02:49:24.040Z	8km NNE of Luther, Oklahoma
3.6	2017-02-28T02:31:47.378Z	7km ENE of Harrah, Oklahoma
2.5	2016-07-08T02:49:21.040Z	7km ENE of Harrah, Oklahoma
2.8	2016-07-08T02:49:21.040Z	7km ENE of Harrah, Oklahoma
2.5	2016-07-08T02:49:21.040Z	2km E of Luther, Oklahoma
3	2016-07-08T02:49:19.040Z	17km NE of Seminole, Oklahoma
2.8	2016-06-21T01:14:03.040Z	3km E of Luther, Oklahoma
3.1	2016-06-21T01:14:03.040Z	2km E of Luther, Oklahoma
2.6	2016-06-21T01:14:03.040Z	2km E of Luther, Oklahoma
3.2	2016-06-21T01:14:03.040Z	3km E of Luther, Oklahoma
3.1	2016-06-21T01:14:02.040Z	2km E of Luther, Oklahoma
2.9	2016-06-17T21:45:58.040Z	2km E of Luther, Oklahoma
3.6	2016-06-17T21:45:52.040Z	2km E of Luther, Oklahoma
3.1	2016-06-17T21:45:52.040Z	2km E of Luther, Oklahoma
3.3	2016-06-17T21:45:52.040Z	2km E of Luther, Oklahoma
2.9	2016-06-17T21:45:50.040Z	2km E of Luther, Oklahoma
3.2	2016-06-17T21:45:12.040Z	7km NNE of Luther, Oklahoma
3.3	2016-06-17T21:45:12.040Z	7km NNE of Luther, Oklahoma
3.2	2016-09-07T13:26:47.983Z	7km NNE of Luther, Oklahoma
2.8	2016-06-10T23:33:00.040Z	7km NNE of Luther, Oklahoma
3.2	2016-06-10T23:33:00.040Z	7km NNE of Luther, Oklahoma
2.7	2016-06-10T23:33:00.040Z	7km NNE of Luther, Oklahoma
3	2016-06-10T23:33:00.040Z	6km NNE of Luther, Oklahoma
3	2016-06-10T23:32:50.040Z	7km NNE of Luther, Oklahoma
2.5	2016-06-10T23:32:49.040Z	11km NE of Harrah, Oklahoma
3	2018-08-11T20:25:59.336Z	6km WSW of Meeker, Oklahoma
2.6	2016-05-21T00:05:31.040Z	13km NW of Chandler, Oklahoma
2.6	2016-05-21T00:05:26.040Z	7km E of McLoud, Oklahoma
3.1	2016-05-21T00:05:25.040Z	13km NW of Chandler, Oklahoma

3	2016-05-16T18:01:49.040Z	9km SE of Luther, Oklahoma
3.4	2016-05-06T23:34:22.040Z	6km NNE of Luther, Oklahoma
2.6	2016-05-06T23:34:14.040Z	7km E of McLoud, Oklahoma
2.6	2016-05-03T23:44:19.040Z	7km NNE of Luther, Oklahoma
2.5	2016-05-03T23:44:16.040Z	7km NNE of Luther, Oklahoma
2.8	2016-05-03T23:44:15.040Z	10km NNE of Luther, Oklahoma
3.2	2016-05-03T23:44:14.040Z	6km NNE of Luther, Oklahoma
2.7	2016-05-03T23:44:13.040Z	7km NNE of Luther, Oklahoma
2.6	2016-05-03T23:44:13.040Z	7km NNE of Luther, Oklahoma
2.7	2016-05-03T23:44:11.040Z	7km NNE of Luther, Oklahoma
3.5	2016-04-26T23:28:26.040Z	7km NNE of Luther, Oklahoma
2.8	2016-04-26T23:28:26.040Z	7km NNE of Luther, Oklahoma
3.4	2016-04-26T23:28:25.040Z	7km NNE of Luther, Oklahoma
2.5	2016-04-26T23:28:25.040Z	7km NNE of Luther, Oklahoma
3.3	2016-04-26T23:28:25.040Z	7km NNE of Luther, Oklahoma
3.1	2016-04-26T23:28:23.040Z	7km NNE of Luther, Oklahoma
2.7	2016-04-26T23:28:23.040Z	7km NNE of Luther, Oklahoma
2.9	2016-04-26T23:28:22.040Z	7km NNE of Luther, Oklahoma
2.5	2016-04-19T01:33:22.040Z	4km E of Harrah, Oklahoma
3.1	2016-04-14T22:51:36.040Z	10km SW of Boley, Oklahoma
2.8	2016-04-08T23:06:09.040Z	4km SSE of Chandler, Oklahoma
2.5	2016-04-06T17:30:27.040Z	5km WNW of Prague, Oklahoma
2.9	2016-03-30T02:27:52.040Z	11km ESE of Luther, Oklahoma
2.9	2016-03-30T02:27:52.040Z	11km ESE of Luther, Oklahoma
3.4	2016-03-05T01:42:09.040Z	11km ESE of Luther, Oklahoma
2.8	2016-03-05T01:42:09.040Z	11km ESE of Luther, Oklahoma
2.9	2016-02-18T04:48:48.040Z	3km ESE of Luther, Oklahoma
2.6	2016-02-18T04:48:42.040Z	7km SSW of Boley, Oklahoma
2.5	2016-02-05T03:16:35.040Z	9km NW of Prague, Oklahoma
2.6	2016-01-22T23:41:12.040Z	14km NW of Chandler, Oklahoma
2.8	2016-01-11T21:07:18.040Z	6km ENE of McLoud, Oklahoma
2.5	2016-01-04T22:29:33.040Z	6km ENE of McLoud, Oklahoma
3.2	2016-01-04T22:28:45.040Z	6km NNW of Stroud, Oklahoma
2.6	2016-01-04T22:28:40.040Z	3km SSE of Harrah, Oklahoma
2.5	2015-12-28T23:08:36.040Z	10km S of Boley, Oklahoma
2.6	2015-12-21T23:16:33.040Z	14km ESE of Luther, Oklahoma
2.9	2015-12-12T00:42:45.040Z	9km NW of Prague, Oklahoma
2.7	2015-12-05T01:40:31.040Z	8km NW of Prague, Oklahoma
2.7	2015-12-05T01:40:27.040Z	9km S of Chandler, Oklahoma
2.6	2015-12-01T00:36:04.040Z	9km NW of Prague, Oklahoma
3.3	2015-11-17T00:13:33.040Z	12km N of Seminole, Oklahoma
2.8	2015-11-06T18:06:25.040Z	12km SSW of Boley, Oklahoma

2.5	2015-11-06T18:06:26.040Z	10km E of Luther, Oklahoma
2.8	2015-11-06T18:06:24.040Z	10km S of Chandler, Oklahoma
3.6	2015-11-06T18:06:23.040Z	1km WNW of McLoud, Oklahoma
3	2015-11-06T18:06:21.040Z	7km SSW of Boley, Oklahoma
2.5	2015-10-22T20:04:55.040Z	2km E of Luther, Oklahoma
3	2015-10-22T20:04:54.040Z	2km WNW of McLoud, Oklahoma
2.8	2015-10-14T21:05:41.040Z	0km NNW of McLoud, Oklahoma
2.9	2015-10-09T20:19:17.040Z	10km E of Luther, Oklahoma
2.9	2015-10-09T20:19:12.040Z	0km WNW of McLoud, Oklahoma
2.7	2015-10-09T20:19:09.040Z	10km E of Luther, Oklahoma
2.5	2015-10-09T20:19:09.040Z	9km E of Luther, Oklahoma
3	2015-10-09T20:19:09.040Z	9km E of Luther, Oklahoma
2.6	2015-09-02T22:37:26.040Z	6km SSW of Boley, Oklahoma
2.8	2015-09-02T22:37:19.040Z	14km ESE of Luther, Oklahoma
3.5	2015-08-20T00:43:55.040Z	8km NNE of Harrah, Oklahoma
2.6	2015-08-10T13:08:29.040Z	8km NNE of Harrah, Oklahoma
3.4	2015-08-10T13:08:20.040Z	13km NW of Chandler, Oklahoma
3	2015-08-08T00:50:10.040Z	13km NW of Chandler, Oklahoma
3.6	2015-08-08T00:50:10.040Z	13km NW of Chandler, Oklahoma
3.7	2015-08-08T00:50:05.040Z	13km NW of Chandler, Oklahoma
2.7	2015-08-08T00:49:51.040Z	13km NW of Chandler, Oklahoma
3.3	2015-08-08T00:49:50.040Z	13km NW of Chandler, Oklahoma
3.5	2015-08-08T00:49:49.040Z	13km NW of Chandler, Oklahoma
3.5	2015-08-08T00:49:48.040Z	13km NW of Chandler, Oklahoma
2.7	2015-08-08T00:48:53.040Z	9km S of Boley, Oklahoma
3.2	2015-07-29T01:35:43.040Z	13km ESE of Luther, Oklahoma
3	2015-07-23T01:04:03.040Z	13km ESE of Luther, Oklahoma
3.3	2015-07-23T01:04:03.040Z	13km ESE of Luther, Oklahoma
2.5	2015-07-23T01:04:00.040Z	4km ENE of Harrah, Oklahoma
2.5	2015-07-17T07:05:54.040Z	13km ESE of Luther, Oklahoma
3	2015-07-17T07:05:53.040Z	14km ESE of Luther, Oklahoma
2.6	2015-07-17T07:05:53.040Z	13km ESE of Luther, Oklahoma
2.7	2015-07-09T22:00:13.040Z	2km ESE of Harrah, Oklahoma
3.2	2015-07-09T22:00:11.040Z	14km ESE of Luther, Oklahoma
2.9	2015-07-03T00:23:42.040Z	13km ESE of Luther, Oklahoma
2.5	2015-06-26T23:16:01.040Z	8km N of Meeker, Oklahoma
2.8	2015-06-22T23:19:01.040Z	4km WNW of Prague, Oklahoma
2.8	2015-06-22T23:19:01.040Z	9km SE of Luther, Oklahoma
2.5	2015-06-12T01:53:30.040Z	12km ESE of Luther, Oklahoma
2.5	2015-06-12T01:53:30.040Z	10km SW of Chandler, Oklahoma
2.5	2015-06-12T01:53:28.040Z	8km W of Meeker, Oklahoma
2.9	2015-06-12T01:53:26.040Z	3km W of Boley, Oklahoma

2.5	2015-06-12T01:53:25.040Z	10km SW of Chandler, Oklahoma
2.8	2015-06-09T21:30:03.040Z	14km NW of Chandler, Oklahoma
3.6	2015-06-09T21:30:03.040Z	13km NW of Chandler, Oklahoma
2.8	2015-06-04T00:46:24.040Z	9km NW of Prague, Oklahoma
2.5	2015-06-04T00:46:18.040Z	7km E of McLoud, Oklahoma
2.5	2015-05-28T00:48:35.040Z	8km W of Meeker, Oklahoma
2.8	2015-05-19T00:30:04.040Z	7km NE of Harrah, Oklahoma
3	2015-05-12T20:29:37.040Z	4km WSW of Meeker, Oklahoma
2.8	2015-05-11T23:20:23.040Z	4km WSW of Meeker, Oklahoma
3.1	2015-05-04T22:47:45.040Z	9km NW of Prague, Oklahoma
2.5	2015-05-02T14:06:32.040Z	6km ENE of Luther, Oklahoma
2.7	2015-05-02T14:06:25.040Z	8km NW of Prague, Oklahoma
3.3	2015-05-02T14:06:25.040Z	9km NW of Prague, Oklahoma
2.7	2015-04-20T15:34:53.040Z	8km NE of Luther, Oklahoma
2.9	2015-04-10T18:56:28.040Z	6km E of McLoud, Oklahoma
2.5	2015-03-27T07:01:11.040Z	16km NNE of Luther, Oklahoma
2.6	2015-03-17T02:38:18.040Z	16km NNE of Luther, Oklahoma
3	2017-07-14T20:01:39.949Z	6km E of Meeker, Oklahoma
2.7	2017-07-14T20:08:58.367Z	3km WSW of Boley, Oklahoma
2.5	2015-02-28T02:16:16.040Z	3km WSW of Boley, Oklahoma
2.9	2017-07-14T20:09:14.258Z	4km WSW of Boley, Oklahoma
2.7	2015-02-28T02:16:16.040Z	4km WSW of Boley, Oklahoma
2.8	2015-02-28T02:16:15.040Z	13km NNE of Chandler, Oklahoma
2.8	2015-02-28T02:16:15.040Z	14km NNE of Chandler, Oklahoma
3.7	2017-07-14T20:10:10.123Z	14km NNE of Chandler, Oklahoma
2.5	2015-02-28T02:16:14.040Z	11km NE of Luther, Oklahoma
3.6	2017-07-14T20:23:29.801Z	9km NW of Prague, Oklahoma
2.8	2017-07-14T20:46:47.159Z	11km NNE of Luther, Oklahoma
2.7	2017-07-14T20:47:52.844Z	16km SSW of Boley, Oklahoma
3.6	2017-07-14T20:48:11.860Z	16km SSW of Boley, Oklahoma
2.5	2017-07-14T20:48:29.630Z	11km NE of Luther, Oklahoma
3.2	2017-07-14T20:57:51.581Z	5km ENE of McLoud, Oklahoma
2.6	2015-01-20T09:03:11.040Z	15km WNW of Chandler, Oklahoma
3.5	2017-07-14T21:12:36.830Z	10km SW of Boley, Oklahoma
2.6	2015-01-06T23:49:51.040Z	11km NE of Luther, Oklahoma
3.1	2017-07-14T21:22:41.408Z	11km NE of Luther, Oklahoma
2.6	2015-01-06T23:49:50.040Z	11km NE of Luther, Oklahoma
3.2	2017-07-14T21:22:54.053Z	11km NE of Luther, Oklahoma
2.8	2017-07-14T21:23:12.449Z	12km NNE of Luther, Oklahoma
2.8	2015-01-06T23:49:47.040Z	11km NE of Luther, Oklahoma
2.7	2017-07-14T21:26:16.660Z	11km NE of Luther, Oklahoma
3.2	2017-07-14T21:26:32.348Z	11km NE of Luther, Oklahoma

2.5	2016-01-22T03:47:50.925Z	11km NE of Luther, Oklahoma
3.3	2015-01-30T18:53:53.720Z	6km SW of Boley, Oklahoma
2.7	2015-01-31T04:36:58.828Z	8km E of Luther, Oklahoma
2.5	2014-11-22T02:06:37.000Z	3km N of Harrah, Oklahoma
2.6	2014-11-22T02:06:24.000Z	3km N of Harrah, Oklahoma
3.5	2015-01-30T04:29:52.732Z	13km S of Boley, Oklahoma
2.8	2014-11-15T04:07:08.000Z	12km S of Boley, Oklahoma
3.1	2015-01-31T05:18:55.465Z	11km SSW of Chandler, Oklahoma
2.5	2014-10-29T19:52:52.000Z	11km SSW of Chandler, Oklahoma
2.9	2014-10-29T19:52:51.000Z	10km SSW of Chandler, Oklahoma
2.7	2014-10-17T21:12:08.000Z	3km N of Harrah, Oklahoma
2.8	2015-01-31T00:31:06.093Z	3km N of Harrah, Oklahoma
3.9	2015-01-28T11:20:34.249Z	3km N of Harrah, Oklahoma
3.5	2015-01-28T22:36:28.071Z	3km NNE of Harrah, Oklahoma
2.5	2014-10-10T08:02:16.000Z	3km N of Harrah, Oklahoma
2.8	2015-01-30T10:24:02.682Z	3km N of Harrah, Oklahoma
2.5	2014-10-10T08:02:10.000Z	9km NW of Prague, Oklahoma
2.7	2014-09-19T17:22:00.000Z	15km SSW of Boley, Oklahoma
2.6	2014-09-19T17:22:46.000Z	17km NE of Seminole, Oklahoma
2.5	2014-09-12T15:47:46.000Z	4km ESE of Harrah, Oklahoma
2.5	2014-08-30T17:02:58.000Z	2km ESE of Harrah, Oklahoma
2.7	2014-08-30T17:02:58.000Z	6km ESE of Meeker, Oklahoma
2.8	2014-08-26T01:21:11.000Z	11km SW of Chandler, Oklahoma
3.1	2015-01-30T05:41:29.666Z	8km SSW of Boley, Oklahoma
3.2	2015-01-30T04:31:59.071Z	12km NNW of Chandler, Oklahoma
3.4	2015-01-30T07:30:20.042Z	13km NNW of Chandler, Oklahoma
3.2	2014-07-01T02:37:53.000Z	13km SSE of Prague, Oklahoma
2.5	2014-06-11T06:06:03.000Z	13km NW of Chandler, Oklahoma
3.2	2015-01-30T06:42:44.757Z	13km NW of Chandler, Oklahoma
2.7	2014-05-29T23:32:10.000Z	13km NW of Chandler, Oklahoma
3	2015-01-30T07:51:37.314Z	2km NNE of Stroud, Oklahoma
2.5	2014-05-24T00:54:36.000Z	9km NW of Prague, Oklahoma
2.5	2014-05-16T21:51:48.000Z	13km NW of Chandler, Oklahoma
2.8	2014-05-16T21:51:40.000Z	8km NW of Prague, Oklahoma
2.5	2014-05-16T21:51:38.000Z	8km NNE of Luther, Oklahoma
2.8	2015-01-30T19:04:07.952Z	13km NNW of Chandler, Oklahoma
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3.5	2015-01-29T03:31:17.051Z	13km NNW of Chandler, Oklahoma

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2.6	2013-12-09T21:11:14.000Z	6km SW of Boley, Oklahoma
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2.6	2014-11-07T01:51:05.795Z	Oklahoma
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3.3	2017-06-26T22:11:08.169Z	4km NNW of McLoud, Oklahoma
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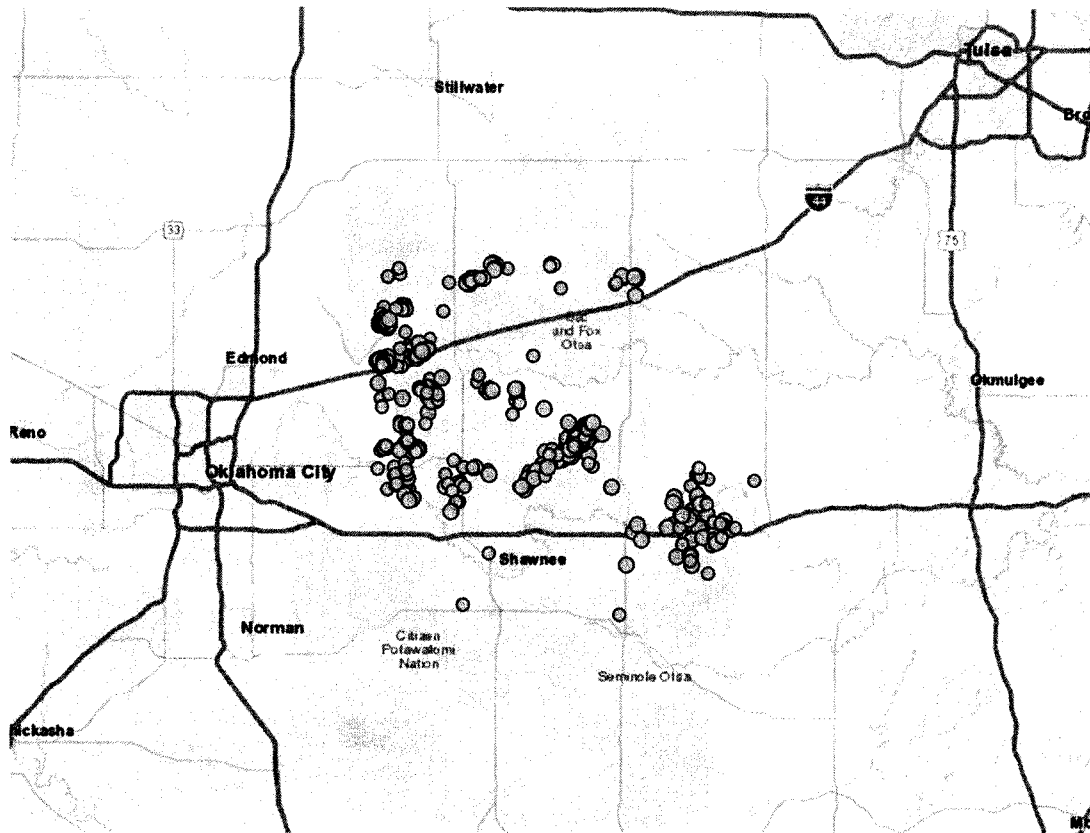
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4.8	2017-06-26T21:38:59.497Z	Oklahoma

92. All of the seismicity at issue in this proceeding (detailed in the paragraph above), and caused by New Dominion and resulting in damages to Plaintiffs' properties are also depicted in the following map:



VI. CAUSES OF ACTION

A. Count I – Absolute Liability

93. Plaintiffs reassert, restate, and incorporate by reference the preceding paragraphs as set forth above as if fully set forth here, word-for-word.

94. Defendant's actions described above are ultra-hazardous activities that involve a risk of serious harm to a person or the chattels of others that cannot be eliminated by exercising the utmost care and are not a matter of common usage.

95. As a direct and proximate result of Defendant's ultra-hazardous activities, Plaintiffs have sustained damages, which are the direct and proximate result of Defendant's ultra-hazardous or abnormally dangerous activities, to which Defendant is strictly liable, including:

- a. Damages to Plaintiffs' personal and real properties;

- b. Annoyance and inconvenience occasioned by the earthquake damages created by the Defendant on Plaintiffs' properties;
- c. Market loss to the real estate; and
- d. Economic loss.

B. Count II – Private Nuisance

96. Plaintiffs reassert, restate, and incorporate by reference the preceding paragraphs as set forth above as if fully set forth here, word-for-word.

97. The Defendant's conduct constitutes a private nuisance.

98. Plaintiffs have property rights and are privileged regarding the use and enjoyment of their land and other property. Defendant's actions and operations as described above have unlawfully and unreasonably interfered with those rights and privileges.

99. Plaintiffs have suffered harm and damages because of Defendant's creation of a private nuisance, including:

- a. Damages to personal and real property;
- b. Annoyance and inconvenience occasioned by the earthquake damages created by the Defendant;
- c. Market loss to the real estate; and
- d. Economic loss.

C. Count III – Negligence

100. Plaintiffs reassert, restate, and incorporate by reference the preceding paragraphs as set forth above as if fully set forth here, word-for-word.

101. Defendant owed a duty to Plaintiffs to use ordinary care and not to operate or maintain their injection wells in such a way as to cause or contribute to seismic activity.

Defendant, experienced in these operations, well knew of the connection between injection wells and seismic activity, and acted in disregard of these facts.

102. As a direct and proximate result of these facts, omissions, and fault of the Defendant, Plaintiffs have suffered damages and injuries reasonably foreseeable to the Defendant, including:

- a. Damages to personal and real property;
- b. Annoyance and inconvenience occasioned by the earthquake damages created by the Defendant;
- c. Market loss to the real estate; and
- d. Economic loss.

D. Count IV – Gross Negligence

103. Plaintiffs reassert, restate, and incorporate by reference the preceding paragraphs as set forth above as if fully set forth here, word-for-word.

104. The Defendant's operations constituted a pattern of negligence that caused harm to Plaintiff.

105. By injecting produced water in disposal wells, Defendant intentionally failed to perform a manifest duty in reckless disregard of the consequences and in callous indifference to the life, liberty, and property of others. New Dominion is a sophisticated business entity with decades of experience in oil and gas operations and failed to exercise slight care and essentially acted with reckless indifferences to the consequences of their actions.

106. As a direct and proximate result of these facts, omissions, and fault of the Defendant, Plaintiffs have suffered damages and injuries reasonably foreseeable to the Defendant, including:

- a. Damages to personal and real property;

- b. Annoyance and inconvenience occasioned by the earthquake damages created by the Defendant;
- c. Market loss to the real estate; and
- d. Economic loss.

E. Count V – Trespass

107. Plaintiffs reassert, restate, and incorporate by reference the preceding paragraphs as set forth above as if fully set forth here, word-for-word.

108. Defendant, without Plaintiffs' consent and without legal right, intentionally engaged in activities that resulted in concussions or vibrations to enter Plaintiffs' properties. Such unauthorized invasion of Plaintiffs' properties interests by concussions or vibrations by Defendant constitute a trespass.

109. Because of Defendant's trespass, Plaintiffs have suffered damages, including:

- a. Damages to personal and real property;
- b. Annoyance and inconvenience occasioned by the earthquake damages created by the Defendant;
- c. Market loss to the real estate; and
- d. Economic loss.

VII. PUNITIVE DAMAGES

110. Plaintiffs reassert, restate, and incorporate by reference preceding paragraphs as set forth above as if fully set forth here, word-for-word.

111. Defendant's actions, in knowingly causing seismic activity because of their injection well operations, constitute wanton or reckless disregard for public or private safety, and thus subject to a claim for punitive damages, for which Plaintiffs seek an amount sufficient to punish the Defendant and to deter it and others from such conduct in the future.

VIII. DEMAND FOR JURY TRIAL

112. Plaintiffs respectfully demand a trial by jury.

IX. PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request the following relief against New Dominion, LLC:

- (1) A judgment against New Dominion, LLC awarding damages caused by the conduct of the New Dominion, LLC in an amount to be proven at trial;
- (2) Punitive damages;
- (3) Attorneys' fees, expenses, and costs;
- (4) Pre-judgment and post-judgment interest; and
- (5) All other relief to which Plaintiffs are entitled or that the Court deems just and proper.

RESPECTFULLY SUBMITTED this _____ day of _____, 2020.



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