

In the Supreme Court of the United States

OCTOBER TERM, 1997

UNITED STATES OF AMERICA, PLAINTIFF

v.

STATE OF LOUISIANA, ET AL.

(TEXAS BOUNDARY CASE)

ON BILL OF COMPLAINT

**JOINT MOTION FOR ENTRY OF A SUPPLEMENTAL
DECREE, MEMORANDUM IN SUPPORT OF JOINT
MOTION FOR A SUPPLEMENTAL DECREE, AND
PROPOSED SUPPLEMENTAL DECREE**

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ON BILL OF COMPLAINT

**JOINT MOTION FOR ENTRY OF A
SUPPLEMENTAL DECREE**

The United States of America and the State of Texas jointly move that this Court enter a supplemental decree in the form and manner of the attached proposed decree. The basis for this motion is explained in the memorandum that follows.

Respectfully submitted.

DAN MORALES
Attorney General
State of Texas

SETH P. WAXMAN
Solicitor General

SEPTEMBER 1998

In the Supreme Court of the United States

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(TEXAS BOUNDARY CASE)

ON BILL OF COMPLAINT

**MEMORANDUM IN SUPPORT OF JOINT MOTION
FOR A SUPPLEMENTAL DECREE**

This joint motion arises from past litigation between the United States and the State of Texas to resolve the seaward boundary of that State for purposes of the Submerged Lands Act, 43 U.S.C. 1301 *et seq.* The Submerged Lands Act provides that the coastal States shall be entitled to a prescribed measure of submerged lands extending seaward from their respective coastlines. As a result of the previous litigation, the Court entered a decree describing the federal-state boundary as an ambulatory line that may move in response to changes in the coastline. *United States v. Louisiana (Texas Boundary*

Case) 394 U.S. 836 (1969). The parties ask this Court to enter a supplemental decree immobilizing the federal-state boundary on the basis of fixed coordinates.

1. Congress enacted the Submerged Lands Act in response to a series of decisions of this Court holding that the States have no entitlement under the Equal Footing Doctrine to submerged lands seaward of their coastlines. *United States v. Texas*, 339 U.S. 707 (1950); *United States v. Louisiana*, 339 U.S. 699 (1950); *United States v. California*, 332 U.S. 19 (1947). Following the enactment of the Submerged Lands Act, the United States filed suit against Louisiana to determine the extent of that State's statutory entitlement to submerged lands in the Gulf of Mexico. See *United States v. Louisiana*, 350 U.S. 990 (1956). The United States and the States of Alabama, Florida, Mississippi, and Texas later expanded the litigation to encompass the States' Submerged Lands Act rights along the entire Gulf Coast. See *United States v. Louisiana*, 354 U.S. 515 (1957) (per curiam).

The United States moved for judgment on the pleadings, and the Court issued two opinions, ruling that the Submerged Lands Act grants Alabama, Mississippi, and Louisiana submerged lands within three geographic miles of their coastlines, *United States v. Louisiana*, 363 U.S. 1, 83 (1960), that the Act grants Texas submerged lands within three marine leagues of its coastline, *id.* at 84, and that the Act grants Florida submerged lands within three marine leagues of its coastline along the Gulf of Mexico, *United States v. Florida*, 363 U.S. 121 (1960). The Court entered a final decree to that effect. *United States v. Louisiana*, 364 U.S. 502 (1960).

Thereafter, the United States sought to reopen the case to determine, among other things, specific issues regarding the location of Texas's seaward boundary. See *United States v. Louisiana*, 386 U.S. 979 (1967); see also *United States v. Louisiana*, 386 U.S. 1016 (1967). This Court ultimately ruled that Texas's three marine league grant should be measured from the "historical boundary" of Texas as it existed in 1845, when Texas was admitted to the Union, and does not include subsequent artificial additions, such as jetties. *United States v. Louisiana*, 389 U.S. 155, 156 (1967). The Court later determined, however, that Section 2(b) of the Submerged Lands Act, 43 U.S.C. 1301(b), limits the maximum extent of Texas's grant to three marine leagues seaward from the current coastline. *United States v. Louisiana (Texas Boundary Case)*, 394 U.S. 1 (1969).

Under the Court's rulings, Texas is entitled to submerged lands within three marine leagues of its 1845 coastline, except where the coastline has receded from its 1845 location. In the latter places, Texas is entitled to the submerged lands within three marine leagues of the current ambulatory coastline. The United States and Texas jointly submitted, and this Court approved on May 5, 1969, a supplemental decree describing the 1845 coastline and defining an ambulatory federal-state boundary on the basis of those principles. *Texas Boundary Case*, 394 U.S. 836.

2. As Texas has noted, an ambulatory federal-state boundary can present practical difficulties for a State's offshore mineral leasing program because erosion of the coastline may affect the State's title to the leased territory near the federal-state boundary. See, e.g., *Texas Boundary Case*, 394 U.S. at 5-6. The Court acknowledged that possibility, but pointed out

that the potential problems arise from the terms of the Submerged Lands Act and that "Texas must look to Congress for relief." *Id.* at 6. Congress has responded to the problem by amending the Submerged Lands Act to provide:

Any boundary between a State and the United States under this Act which has been or is hereafter fixed by coordinates under a final decree of the United States Supreme Court shall remain immobilized at the coordinates provided under such decree and shall not be ambulatory.

Outer Continental Shelf Lands Act Amendments of 1985, Pub. L. No. 99-272, Tit. VIII, § 8005, 100 Stat. 151, codified at 43 U.S.C. 1301(b). That legislation allows the United States and coastal States to fix federal-state boundaries in appropriate cases and thereby promote certainty and fairness, not only with respect to mineral leasing, but with respect to other sovereign interests as well.

In accordance with the legislation, the United States and Texas have reached an agreement on a specification of fixed coordinates for the federal-state boundary in the area offshore of Texas. They have determined the federal-state boundary by: (1) identifying the 1845 Texas coastline and the current Texas coastline; (2) projecting lines three marine leagues seaward from each of those coastlines; and (3) constructing a composite line using the more landward points of those two lines. The result is a single line, mutually acceptable to the United States and Texas and consistent with Section 2(b) of the Submerged Lands Act, 43 U.S.C. 1301(b), for demarcating the submerged lands rights of the parties. The attached proposed decree sets out the coordinates of that line.

The United States and Texas tender that proposed decree for entry by this Court.

If the Court enters the proposed decree, it would fix the coordinates of the federal-state boundary between the United States and Texas and, in that respect, supersede the boundary description set out in the Court's supplemental decree of May 5, 1969. See *Texas Boundary Case*, 394 U.S. 836. The Court has previously entered other decrees that establish a fixed federal-state boundary in the Gulf of Mexico by specifying the coordinates of the federal-state boundary or the coastline from which the Submerged Lands Act grant is measured. See *United States v. Louisiana (Alabama and Mississippi Boundary Case)*, 507 U.S. 7 (1993) (Alabama coastline); *Mississippi v. United States*, 498 U.S. 16 (1990) (stipulated baseline in the vicinity of Chandeleur Sound); *United States v. Louisiana (Alabama and Mississippi Boundary Case)*, 498 U.S. 9 (1990) (Mississippi coastline in the vicinity of Mississippi Sound); *United States v. Louisiana (Louisiana Boundary Case)* 452 U.S. 726 (1981) (United States-Louisiana boundary); *United States v. Louisiana (Louisiana Boundary Case)*, 422 U.S. 13 (1975) (Louisiana coastline). If the Court enters the proposed decree, the decrees in combination would provide a continuous and fixed federal-state boundary in the Gulf of Mexico from the United States' and the State of Texas's border with the Republic of Mexico to the State of Alabama's border with the State of Florida. See App., *infra*, 32a (map showing the location of the fixed federal-state

boundary established by the proposed and existing decrees).*

For the forgoing reasons, the Court should enter the proposed supplemental decree.

Respectfully submitted.

DAN MORALES
Attorney General
State of Texas

SETH P. WAXMAN
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PROPOSED SUPPLEMENTAL DECREE

On December 12, 1960, this Court entered a final decree addressing the entitlement of the United States and the States of Alabama, Florida, Louisiana, Mississippi, and Texas to lands, minerals, and other natural resources underlying the Gulf of Mexico. *United States v. Louisiana*, 364 U.S. 502 (1960). On May 5, 1969, this Court entered a supplemental decree describing the 1845 coastline of the State of Texas and the offshore boundary between the United States and Texas. *United States v. Louisiana (Texas Boundary Case)*, 394 U.S. 836 (1969). For the purpose of identifying with greater particularity the boundary line between the submerged lands of Texas

* The United States is continuing to work with the State of Florida to develop a fixed federal-state boundary on the Gulf Coast portion of that State. Compare *United States v. Florida*, 425 U.S. 791 (1976) (decree describing an ambulatory federal-state boundary).

and those of the United States, it is ordered, adjudged, and decreed as follows:

1. As against the United States, with the exceptions provided by Section 5 of the Submerged Lands Act, 43 U.S.C. 1313, the State of Texas is entitled to all lands, minerals, and other natural resources underlying the Gulf of Mexico, bounded on the south by the international boundary with the Republic of Mexico and on the east by the boundary between the States of Texas and Louisiana and an extension thereof, that lie landward of the line described in paragraph 3 below.

2. As against the State of Texas, the United States is entitled to all lands, minerals, and other natural resources underlying the Gulf of Mexico, bounded on the south by the international boundary with the Republic of Mexico and on the east by the boundary between the States of Texas and Louisiana and an extension thereof, that lie seaward of the line described in paragraph 3 below.

3. The federal-state boundary line, referred to in paragraphs 1 and 2 above, is located as follows:

TYPE CODE	NAD 27	
	TEXAS SOUTH ZONE (FEET)	
	x-coordinate	y-coordinate
BEGINNING AT	2499640.190	113383.050
BY STRAIGHT LINE TO	2499530.550	116379.990
BY ARC CENTERED AT	2444923.280	113478.030
TO	2499085.770	121013.970
BY STRAIGHT LINE TO	2498580.340	124646.260
BY ARC CENTERED AT	2444417.930	117110.640
TO	2498520.860	125062.040

BY ARC CENTERED AT	2447716.990	104830.000
TO	2498147.430	125977.510
BY STRAIGHT LINE TO	2498068.220	126760.310
BY ARC CENTERED AT	2443661.000	121256.010
TO	2497382.910	131473.560
BY STRAIGHT LINE TO	2497076.470	135705.480
BY STRAIGHT LINE TO	2497119.050	137947.290
BY STRAIGHT LINE TO	2497240.260	139652.480
BY ARC CENTERED AT	2442693.000	143530.000
TO	2496941.950	150421.250
BY STRAIGHT LINE TO	2496722.950	152145.250
BY ARC CENTERED AT	2442474.000	145254.000
TO	2496369.790	154510.440
BY STRAIGHT LINE TO	2495552.790	159267.440
BY ARC CENTERED AT	2441657.000	150011.000
TO	2495160.620	161315.920
BY STRAIGHT LINE TO	2494874.980	162667.810
BY STRAIGHT LINE TO	2494746.000	163636.000
BY STRAIGHT LINE TO	2494468.310	165973.870
BY ARC CENTERED AT	2443246.710	146822.120
TO	2492810.740	169927.290
BY STRAIGHT LINE TO	2492774.800	170112.970
BY ARC CENTERED AT	2439086.150	159722.250
TO	2492588.170	171034.890
BY STRAIGHT LINE TO	2492205.260	174407.590
BY ARC CENTERED AT	2437625.640	171015.450
TO	2491921.560	177526.340
BY STRAIGHT LINE TO	2491552.740	180602.020
BY ARC CENTERED AT	2437256.820	174091.130
TO	2491382.170	181893.990
BY STRAIGHT LINE TO	2491322.660	182306.820
BY STRAIGHT LINE TO	2491250.280	183423.780
BY ARC CENTERED AT	2436679.820	179887.780
TO	2491038.940	185848.050
BY STRAIGHT LINE TO	2490687.070	189057.190

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BY ARC CENTERED AT	2436327.950	183096.920
TO	2490568.140	190056.800
BY STRAIGHT LINE TO	2489781.810	196184.910
BY STRAIGHT LINE TO	2489408.130	199725.490
BY ARC CENTERED AT	2435025.270	193985.870
TO	2488891.700	203411.710
BY STRAIGHT LINE TO	2488385.320	206305.540
BY STRAIGHT LINE TO	2488095.190	207985.200
BY STRAIGHT LINE TO	2487772.010	210387.930
BY ARC CENTERED AT	2433575.160	203098.250
TO	2487561.760	211809.440
BY STRAIGHT LINE TO	2487232.820	213848.020
BY ARC CENTERED AT	2432844.590	208159.240
TO	2487027.760	215549.950
BY STRAIGHT LINE TO	2486636.220	218420.430
BY ARC CENTERED AT	2432453.050	211029.720
TO	2486214.950	221034.530
BY STRAIGHT LINE TO	2485938.220	222521.570
BY STRAIGHT LINE TO	2485815.850	223411.880
BY ARC CENTERED AT	2431640.280	215965.660
TO	2484763.880	228939.650
BY STRAIGHT LINE TO	2484753.860	228995.960
BY ARC CENTERED AT	2430915.120	219413.240
TO	2484707.670	229251.920
BY STRAIGHT LINE TO	2484141.990	232344.750
BY ARC CENTERED AT	2430349.440	222506.070
TO	2483210.720	236510.600
BY STRAIGHT LINE TO	2483055.890	237300.960
BY ARC CENTERED AT	2429390.990	226788.270
TO	2482686.770	239035.640
BY STRAIGHT LINE TO	2482267.080	240861.990
BY STRAIGHT LINE TO	2481855.260	242883.000
BY ARC CENTERED AT	2428271.470	231964.400
TO	2481793.420	243182.190
BY STRAIGHT LINE TO	2481027.530	246836.380

5a

BY ARC CENTERED AT	2427505.580	235618.590
TO	2480357.520	249658.190
BY STRAIGHT LINE TO	2480292.310	249903.680
BY ARC CENTERED AT	2426833.570	238388.260
TO	2479639.120	252601.340
BY STRAIGHT LINE TO	2478059.020	258471.870
BY STRAIGHT LINE TO	2477392.310	261606.470
BY ARC CENTERED AT	2423903.880	250229.900
TO	2476815.070	264044.520
BY STRAIGHT LINE TO	2474580.490	272603.140
BY STRAIGHT LINE TO	2473051.430	278464.090
BY STRAIGHT LINE TO	2472865.110	279221.610
BY ARC CENTERED AT	2419762.850	266160.680
TO	2472134.540	281897.390
BY STRAIGHT LINE TO	2471635.750	283557.370
BY STRAIGHT LINE TO	2471536.110	284004.850
BY ARC CENTERED AT	2418158.400	272119.650
TO	2470645.240	287467.950
BY STRAIGHT LINE TO	2469160.610	292544.980
BY ARC CENTERED AT	2415708.630	280998.210
TO	2468375.640	295716.380
BY STRAIGHT LINE TO	2467281.750	299630.710
BY STRAIGHT LINE TO	2467063.940	300479.790
BY ARC CENTERED AT	2414094.150	286891.590
TO	2466681.490	301891.910
BY STRAIGHT LINE TO	2464286.370	310288.600
BY ARC CENTERED AT	2411699.030	295288.280
TO	2463285.380	313434.620
BY STRAIGHT LINE TO	2461034.980	320839.800
BY ARC CENTERED AT	2408712.780	304939.300
TO	2460234.640	323267.860
BY STRAIGHT LINE TO	2459053.490	326588.090
BY ARC CENTERED AT	2407531.630	308259.530
TO	2458585.720	327853.430
BY ARC CENTERED AT	2406144.130	312351.150

6a

TO	2458085.170	329455.830
BY ARC CENTERED AT	2405329.070	315060.150
TO	2456893.510	333268.570
BY STRAIGHT LINE TO	2456601.800	334094.660
BY ARC CENTERED AT	2402327.560	327405.250
TO	2456491.030	334939.170
BY STRAIGHT LINE TO	2450926.200	352123.960
BY ARC CENTERED AT	2398901.000	335277.000
TO	2450600.010	353099.830
BY ARC CENTERED AT	2402327.560	327405.250
TO	2448841.400	356161.200
BY ARC CENTERED AT	2397154.960	338301.920
TO	2448402.460	357384.260
BY STRAIGHT LINE TO	2448203.960	358041.630
BY ARC CENTERED AT	2395853.580	342234.170
TO	2447351.610	360629.590
BY STRAIGHT LINE TO	2445237.930	366546.830
BY STRAIGHT LINE TO	2444812.700	367941.320
BY ARC CENTERED AT	2392505.710	351990.870
TO	2444593.900	368641.950
BY STRAIGHT LINE TO	2443105.010	373299.520
BY ARC CENTERED AT	2391016.820	356648.440
TO	2442033.710	376339.020
BY ARC CENTERED AT	2389552.290	360972.090
TO	2441418.680	378301.810
BY STRAIGHT LINE TO	2441344.850	378626.700
BY ARC CENTERED AT	2388019.490	366508.780
TO	2439779.110	384154.840
BY STRAIGHT LINE TO	2439562.270	385005.700
BY ARC CENTERED AT	2386571.100	371501.090
TO	2438943.520	387235.390
BY STRAIGHT LINE TO	2437602.910	391697.680
BY ARC CENTERED AT	2385230.490	375963.380
TO	2437234.850	392719.940
BY STRAIGHT LINE TO	2436975.360	393681.380

7a

BY STRAIGHT LINE TO	2436280.090	396142.280
BY STRAIGHT LINE TO	2435935.420	397450.420
BY ARC CENTERED AT	2383055.220	383517.610
TO	2435869.020	397700.130
BY ARC CENTERED AT	2382474.620	385889.990
TO	2434395.970	403054.240
BY STRAIGHT LINE TO	2433650.070	405310.550
BY STRAIGHT LINE TO	2433087.580	407425.790
BY ARC CENTERED AT	2380239.370	393372.130
TO	2432993.510	407774.870
BY STRAIGHT LINE TO	2432437.610	409811.000
BY STRAIGHT LINE TO	2432335.870	410202.980
BY ARC CENTERED AT	2379404.950	396464.120
TO	2432157.640	410872.290
BY ARC CENTERED AT	2378627.400	399693.960
TO	2431651.370	413069.200
BY STRAIGHT LINE TO	2431453.470	413853.740
BY STRAIGHT LINE TO	2431013.370	415825.730
BY ARC CENTERED AT	2377641.480	403914.410
TO	2430848.050	416543.720
BY STRAIGHT LINE TO	2430456.820	418191.950
BY ARC CENTERED AT	2377250.250	405562.640
TO	2430081.080	419681.490
BY STRAIGHT LINE TO	2429782.280	420799.550
BY ARC CENTERED AT	2376492.690	408525.150
TO	2429618.410	421490.340
BY STRAIGHT LINE TO	2429425.410	422281.170
BY ARC CENTERED AT	2376299.690	409315.980
TO	2429115.820	423489.710
BY STRAIGHT LINE TO	2428995.000	423939.930
BY STRAIGHT LINE TO	2428815.500	424717.220
BY ARC CENTERED AT	2375532.880	412412.700
TO	2428479.360	426091.600
BY STRAIGHT LINE TO	2428280.980	427102.420
BY ARC CENTERED AT	2374619.700	416571.290

8a

TO	2427686.310	429776.450
BY STRAIGHT LINE TO	2427221.210	432117.020
BY ARC CENTERED AT	2373585.020	421458.800
TO	2426956.130	433373.750
BY STRAIGHT LINE TO	2426718.550	434664.430
BY ARC CENTERED AT	2372937.210	424764.650
TO	2426443.020	436059.350
BY ARC CENTERED AT	2372724.710	425822.890
TO	2425824.030	438895.890
BY STRAIGHT LINE TO	2425299.740	441472.100
BY ARC CENTERED AT	2371166.980	433720.610
TO	2424769.480	444547.000
BY STRAIGHT LINE TO	2424185.850	447436.620
BY STRAIGHT LINE TO	2424127.670	447874.140
BY ARC CENTERED AT	2369919.910	440666.050
TO	2423862.830	449643.980
BY ARC CENTERED AT	2369485.630	443850.710
TO	2423405.660	452964.920
BY STRAIGHT LINE TO	2422577.640	457863.520
BY ARC CENTERED AT	2368657.610	448749.310
TO	2422499.930	458312.070
BY STRAIGHT LINE TO	2422242.120	460576.560
BY ARC CENTERED AT	2367908.210	454390.750
TO	2422182.660	461078.510
BY ARC CENTERED AT	2367641.220	457119.550
TO	2422138.650	461644.150
BY STRAIGHT LINE TO	2422077.650	462326.940
BY ARC CENTERED AT	2367641.220	457119.550
TO	2421804.280	464656.200
BY STRAIGHT LINE TO	2421763.410	464949.880
BY ARC CENTERED AT	2367204.320	461242.220
TO	2421206.650	469855.550
BY STRAIGHT LINE TO	2421192.970	469999.840
BY STRAIGHT LINE TO	2421148.590	470607.900
BY ARC CENTERED AT	2366608.740	466627.610

9a

TO	2421002.790	472260.180
BY STRAIGHT LINE TO	2420625.570	475903.050
BY STRAIGHT LINE TO	2420474.600	477959.400
BY STRAIGHT LINE TO	2420464.560	478299.760
BY ARC CENTERED AT	2365803.390	476688.020
TO	2420421.760	479385.270
BY STRAIGHT LINE TO	2420325.690	480908.060
BY STRAIGHT LINE TO	2420303.780	481206.590
BY ARC CENTERED AT	2365634.650	479892.280
TO	2420301.800	481286.650
BY STRAIGHT LINE TO	2419964.790	486628.350
BY STRAIGHT LINE TO	2419807.600	488421.100
BY STRAIGHT LINE TO	2419815.100	489050.630
BY ARC CENTERED AT	2365134.050	489702.030
TO	2419817.350	489279.390
BY STRAIGHT LINE TO	2419592.920	493821.700
BY STRAIGHT LINE TO	2419588.860	494734.230
BY STRAIGHT LINE TO	2419586.170	494766.260
BY STRAIGHT LINE TO	2419523.860	497706.230
BY STRAIGHT LINE TO	2419529.920	501346.460
BY STRAIGHT LINE TO	2419441.950	506501.720
BY STRAIGHT LINE TO	2419749.610	514044.990
BY STRAIGHT LINE TO	2419872.320	516348.740
BY STRAIGHT LINE TO	2419879.340	516771.410
BY STRAIGHT LINE TO	2419941.610	518160.240
BY ARC CENTERED AT	2365564.350	523952.890
TO	2420046.380	519246.550
BY STRAIGHT LINE TO	2420164.830	521008.880
BY ARC CENTERED AT	2365603.000	524676.000
TO	2420189.460	521395.780
BY ARC CENTERED AT	2365564.350	523952.890
TO	2420249.280	523965.170
BY STRAIGHT LINE TO	2420314.570	524835.970
BY ARC CENTERED AT	2366101.610	532005.080
TO	2420323.670	524905.110

10a

BY STRAIGHT LINE TO	2420366.920	526247.710
BY STRAIGHT LINE TO	2421336.030	538405.930
BY ARC CENTERED AT	2366824.000	542751.000
TO	2421428.630	539788.670
BY STRAIGHT LINE TO	2421449.160	540167.060
BY STRAIGHT LINE TO	2421590.660	540985.590
BY ARC CENTERED AT	2367705.000	550301.000
TO	2421629.070	541210.570
BY ARC CENTERED AT	2367242.130	546911.620
TO	2421712.320	542070.190
BY STRAIGHT LINE TO	2421873.460	543188.510
BY ARC CENTERED AT	2367747.500	550987.350
TO	2422133.700	545279.250
BY STRAIGHT LINE TO	2422164.040	545456.340
BY ARC CENTERED AT	2368264.240	554689.590
TO	2422202.260	545682.270
BY STRAIGHT LINE TO	2422522.100	548828.020
BY STRAIGHT LINE TO	2422758.260	550124.120
BY ARC CENTERED AT	2368264.240	554689.590
TO	2422789.160	550509.280
BY STRAIGHT LINE TO	2422844.930	550845.260
BY ARC CENTERED AT	2368898.240	559800.470
TO	2422912.170	551260.190
BY ARC CENTERED AT	2369352.490	562296.570
TO	2423047.950	551940.930
BY STRAIGHT LINE TO	2423261.620	553048.840
BY STRAIGHT LINE TO	2423600.420	555115.010
BY STRAIGHT LINE TO	2424692.350	560776.670
BY ARC CENTERED AT	2370786.300	569973.380
TO	2424763.300	561202.680
BY STRAIGHT LINE TO	2424936.150	562266.460
BY ARC CENTERED AT	2371804.880	575209.000
TO	2425189.960	563356.800
BY STRAIGHT LINE TO	2425603.330	565500.130
BY STRAIGHT LINE TO	2425719.410	566062.140

11a

BY ARC CENTERED AT	2371804.880	575209.000
TO	2425970.990	567694.050
BY ARC CENTERED AT	2372891.700	580848.170
TO	2426476.550	569934.620
BY STRAIGHT LINE TO	2426759.750	571094.040
BY ARC CENTERED AT	2373636.620	584069.970
TO	2427001.620	572127.690
BY STRAIGHT LINE TO	2427068.030	572424.430
BY ARC CENTERED AT	2374312.620	586822.650
TO	2428075.200	576821.310
BY STRAIGHT LINE TO	2428113.770	577028.640
BY ARC CENTERED AT	2375731.900	592731.550
TO	2429540.890	582983.010
BY STRAIGHT LINE TO	2429922.920	584415.650
BY ARC CENTERED AT	2377084.350	598505.620
TO	2430569.690	587114.410
BY ARC CENTERED AT	2377692.260	601057.820
TO	2430741.360	587782.480
BY STRAIGHT LINE TO	2431599.780	590546.360
BY ARC CENTERED AT	2379375.720	606766.390
TO	2432118.430	592321.740
BY STRAIGHT LINE TO	2432320.820	593060.740
BY ARC CENTERED AT	2379578.110	607505.390
TO	2432613.420	594175.070
BY ARC CENTERED AT	2380766.020	611561.520
TO	2433949.830	598836.580
BY STRAIGHT LINE TO	2434474.510	600505.210
BY ARC CENTERED AT	2382307.710	616908.460
TO	2434941.410	602071.520
BY STRAIGHT LINE TO	2435346.570	603508.820
BY ARC CENTERED AT	2384049.050	622456.270
TO	2436335.810	606439.530
BY STRAIGHT LINE TO	2436562.320	607178.960
BY ARC CENTERED AT	2385120.810	625731.940
TO	2436838.740	607964.060

12a

BY STRAIGHT LINE TO	2437860.380	611265.290
BY STRAIGHT LINE TO	2440773.250	619882.130
BY STRAIGHT LINE TO	2443621.860	627687.240
BY STRAIGHT LINE TO	2446144.590	633614.600
BY STRAIGHT LINE TO	2449255.470	641224.720
BY STRAIGHT LINE TO	2451943.700	647349.180
BY ARC CENTERED AT	2403216.710	672170.980
TO	2453839.050	651487.170
BY STRAIGHT LINE TO	2454354.520	652748.750
BY ARC CENTERED AT	2404751.450	675769.980
TO	2455233.950	654747.150
BY STRAIGHT LINE TO	2456428.610	657615.910
BY STRAIGHT LINE TO	2457409.770	659715.620
BY STRAIGHT LINE TO	2457492.800	659881.530
BY STRAIGHT LINE TO	2457880.700	660588.980
BY ARC CENTERED AT	2409930.560	686880.150
TO	2459681.540	664180.340
BY ARC CENTERED AT	2410622.500	688339.230
TO	2460486.730	665889.290
BY STRAIGHT LINE TO	2461860.990	668941.700
BY ARC CENTERED AT	2411996.760	691391.640
TO	2462119.470	669524.870
BY ARC CENTERED AT	2412857.140	693266.490
TO	2463355.690	672282.250
BY ARC CENTERED AT	2414870.770	697573.640
TO	2466048.730	678305.590
BY STRAIGHT LINE TO	2466166.030	678617.150
BY STRAIGHT LINE TO	2467162.470	680797.150
BY ARC CENTERED AT	2417426.790	703530.470
TO	2467494.230	681537.440
BY STRAIGHT LINE TO	2469260.580	685558.560
BY ARC CENTERED AT	2419193.140	707551.590
TO	2470435.270	688454.830
BY STRAIGHT LINE TO	2471688.830	691818.490
BY STRAIGHT LINE TO	2471885.230	692323.690

13a

BY STRAIGHT LINE TO	2472205.200	692969.770
BY ARC CENTERED AT	2423200.660	717239.030
TO	2472310.610	693183.800
BY STRAIGHT LINE TO	2473617.860	695852.620
BY ARC CENTERED AT	2426284.340	723238.370
TO	2475216.930	698824.380
BY STRAIGHT LINE TO	2475401.770	699194.860
BY ARC CENTERED AT	2431965.410	732417.200
TO	2477193.450	701678.530
BY STRAIGHT LINE TO	2477226.150	701747.670
BY STRAIGHT LINE TO	2482144.440	710612.870
BY ARC CENTERED AT	2432146.070	732762.470
TO	2483702.310	714530.740
BY ARC CENTERED AT	2439420.060	746616.940
TO	2488071.690	721647.760
BY STRAIGHT LINE TO	2488180.360	721859.490
BY ARC CENTERED AT	2441291.670	750000.080
TO	2489005.570	723282.570
BY STRAIGHT LINE TO	2489076.160	723408.630
BY ARC CENTERED AT	2443300.190	753325.220
TO	2491593.620	727670.080
BY STRAIGHT LINE TO	2491955.580	728217.450
BY ARC CENTERED AT	2446341.710	758380.620
TO	2494300.900	732105.970
BY STRAIGHT LINE TO	2495840.520	734483.860
BY ARC CENTERED AT	2449937.320	764204.860
TO	2496595.180	735683.190
BY ARC CENTERED AT	2452452.610	767961.280
TO	2498869.230	739048.680
BY ARC CENTERED AT	2455279.690	772069.780
TO	2500456.130	741255.320
BY STRAIGHT LINE TO	2500712.690	741564.640
BY ARC CENTERED AT	2458621.980	776476.150
TO	2504252.800	746338.630
BY STRAIGHT LINE TO	2505354.910	748007.320

14a

BY ARC CENTERED AT	2459724.090	778144.840
TO	2505590.820	748367.590
BY STRAIGHT LINE TO	2505983.500	748889.880
BY STRAIGHT LINE TO	2511490.700	757056.430
BY STRAIGHT LINE TO	2515271.770	762239.850
BY ARC CENTERED AT	2471092.000	794467.000
TO	2522659.430	776266.950
BY ARC CENTERED AT	2469699.060	789891.960
TO	2523181.540	778487.310
BY STRAIGHT LINE TO	2524130.650	780076.610
BY ARC CENTERED AT	2477180.560	808114.640
TO	2524616.270	780906.270
BY STRAIGHT LINE TO	2525688.370	782775.400
BY STRAIGHT LINE TO	2526405.610	783873.390
BY STRAIGHT LINE TO	2526912.250	784575.150
BY ARC CENTERED AT	2485221.810	819963.690
TO	2529566.360	787963.660
BY STRAIGHT LINE TO	2530120.660	788731.790
BY ARC CENTERED AT	2485776.110	820731.820
TO	2530599.690	789406.300
BY STRAIGHT LINE TO	2532693.510	792048.080
BY ARC CENTERED AT	2489837.050	826015.210
TO	2533104.660	792573.390

NAD 27

TEXAS SOUTH CENTRAL

ZONE (FEET)

<u>TYPE CODE</u>	<u>x-coordinate</u>	<u>y-coordinate</u>
BEGINNING AT	2694807.370	7920.000
BY ARC CENTERED AT	2651368.410	41138.940
TO	2695028.050	8210.570
BY STRAIGHT LINE TO	2696328.030	9934.210
BY ARC CENTERED AT	2652668.390	42862.580

15a

TO	2697132.900	11029.450
BY STRAIGHT LINE TO	2697605.010	11688.900
BY STRAIGHT LINE TO	2698950.860	13543.300
BY STRAIGHT LINE TO	2699068.710	13696.800
BY ARC CENTERED AT	2655692.950	46998.220
TO	2699266.660	13956.230
BY STRAIGHT LINE TO	2700474.150	15548.600
BY STRAIGHT LINE TO	2701138.660	16356.020
BY ARC CENTERED AT	2658914.680	51106.230
TO	2703459.340	19385.340
BY STRAIGHT LINE TO	2704242.140	20343.120
BY STRAIGHT LINE TO	2706136.980	22576.320
BY ARC CENTERED AT	2664439.240	57956.260
TO	2707160.620	23819.400
BY STRAIGHT LINE TO	2707981.110	24846.220
BY ARC CENTERED AT	2668397.030	62576.080
TO	2711386.470	28777.420
BY ARC CENTERED AT	2672807.810	67534.720
TO	2712913.170	30359.440
BY STRAIGHT LINE TO	2714851.590	32807.340
BY STRAIGHT LINE TO	2720375.410	38908.640
BY STRAIGHT LINE TO	2724706.490	43579.770
BY STRAIGHT LINE TO	2727377.400	46418.300
BY ARC CENTERED AT	2691713.000	87873.000
TO	2728696.140	47590.380
BY STRAIGHT LINE TO	2729240.290	48143.360
BY ARC CENTERED AT	2690262.500	86499.240
TO	2731180.770	50220.650
BY STRAIGHT LINE TO	2732208.340	51122.910
BY ARC CENTERED AT	2691713.000	87873.000
TO	2733517.040	52618.730
BY STRAIGHT LINE TO	2745286.590	64044.590
BY STRAIGHT LINE TO	2759114.410	76841.960
BY STRAIGHT LINE TO	2760917.070	78431.750
BY STRAIGHT LINE TO	2775278.440	90137.930

16a

BY STRAIGHT LINE TO	2780827.390	94573.040
BY ARC CENTERED AT	2746685.000	137290.000
TO	2782550.130	96008.850
BY STRAIGHT LINE TO	2783851.500	97139.490
BY STRAIGHT LINE TO	2791481.830	102793.450
BY STRAIGHT LINE TO	2800074.060	109136.540
BY STRAIGHT LINE TO	2807481.710	114229.980
BY STRAIGHT LINE TO	2814202.430	118282.770
BY ARC CENTERED AT	2785963.000	165112.000
TO	2815384.430	119016.220
BY STRAIGHT LINE TO	2824561.520	124873.660
BY STRAIGHT LINE TO	2831319.290	128676.100
BY STRAIGHT LINE TO	2836670.030	131276.120
BY STRAIGHT LINE TO	2839196.630	132253.910
BY ARC CENTERED AT	2819460.000	183253.000
TO	2840052.770	132593.560
BY STRAIGHT LINE TO	2843903.410	134158.820
BY STRAIGHT LINE TO	2844183.740	134312.590
BY STRAIGHT LINE TO	2844955.770	134703.330
BY STRAIGHT LINE TO	2845872.960	135155.240
BY ARC CENTERED AT	2825497.270	185902.390
TO	2849289.540	136664.510
BY STRAIGHT LINE TO	2851199.390	137587.370
BY ARC CENTERED AT	2827407.120	186825.250
TO	2856405.590	140462.220
BY STRAIGHT LINE TO	2858663.940	141874.740
BY ARC CENTERED AT	2829665.470	188237.770
TO	2863238.310	145071.740
BY STRAIGHT LINE TO	2864474.860	146033.480
BY ARC CENTERED AT	2830902.020	189199.510
TO	2869325.100	150287.970
BY STRAIGHT LINE TO	2871170.070	152109.780
BY ARC CENTERED AT	2832746.990	191021.320
TO	2873748.790	154837.150
BY STRAIGHT LINE TO	2874832.670	156065.340

17a

BY ARC CENTERED AT	2833830.870	192249.510
TO	2876665.940	158255.420
BY ARC CENTERED AT	2835315.130	194040.220
TO	2884219.480	169569.700
BY STRAIGHT LINE TO	2885787.250	172702.890
BY ARC CENTERED AT	2836882.900	197173.410
TO	2887801.040	177228.870
BY ARC CENTERED AT	2861037.520	224916.980
TO	2892534.140	180213.460
BY ARC CENTERED AT	2843740.000	204903.000
TO	2893217.860	181613.880
BY STRAIGHT LINE TO	2899305.200	186971.240
BY STRAIGHT LINE TO	2899402.030	187052.190
BY STRAIGHT LINE TO	2902597.410	189375.210
BY ARC CENTERED AT	2861037.520	224916.980
TO	2903033.110	189891.110
BY STRAIGHT LINE TO	2904106.160	190615.100
BY ARC CENTERED AT	2873520.570	235946.800
TO	2905080.870	191288.220
BY STRAIGHT LINE TO	2906715.280	192443.260
BY STRAIGHT LINE TO	2907638.010	193039.690
BY STRAIGHT LINE TO	2908291.270	193514.600
BY STRAIGHT LINE TO	2909528.920	194309.070
BY STRAIGHT LINE TO	2913234.320	196854.940
BY ARC CENTERED AT	2882266.880	241926.650
TO	2913575.440	197091.220
BY STRAIGHT LINE TO	2916494.860	199129.850
BY ARC CENTERED AT	2885186.300	243965.280
TO	2917722.370	200012.520
BY STRAIGHT LINE TO	2921608.890	202889.520
BY ARC CENTERED AT	2889072.820	246842.280
TO	2922355.840	203452.390
BY STRAIGHT LINE TO	2924874.060	204954.900
BY STRAIGHT LINE TO	2925427.680	205261.000
BY ARC CENTERED AT	2898967.370	253118.010

18a

TO	2926410.500	205817.730
BY STRAIGHT LINE TO	2929730.690	207744.070
BY ARC CENTERED AT	2902287.560	255044.350
TO	2929788.430	207777.620
BY STRAIGHT LINE TO	2933284.200	209811.540
BY STRAIGHT LINE TO	2935512.090	211057.520
BY STRAIGHT LINE TO	2938136.100	212469.450
BY ARC CENTERED AT	2912224.160	260625.580
TO	2940025.910	213535.190
BY STRAIGHT LINE TO	2941803.060	214584.410
BY STRAIGHT LINE TO	2945705.860	216708.220
BY ARC CENTERED AT	2919567.150	264741.640
TO	2945971.370	216853.660
BY STRAIGHT LINE TO	2950356.990	219271.780
BY ARC CENTERED AT	2923952.770	267159.760
TO	2952750.810	220671.970
BY STRAIGHT LINE TO	2952941.730	220766.740
BY ARC CENTERED AT	2928628.000	269749.230
TO	2954636.540	221645.200
BY STRAIGHT LINE TO	2955570.580	222150.210
BY ARC CENTERED AT	2929562.040	270254.240
TO	2956349.210	222579.420
BY STRAIGHT LINE TO	2958574.420	223829.710
BY ARC CENTERED AT	2934873.920	273111.830
TO	2960692.460	224905.560
BY STRAIGHT LINE TO	2963431.970	226372.800
BY STRAIGHT LINE TO	2965204.970	227236.970
BY ARC CENTERED AT	2941245.650	276393.790
TO	2967432.070	228386.360
BY ARC CENTERED AT	2945032.090	278273.060
TO	2971422.390	230377.410
BY STRAIGHT LINE TO	2972631.480	231043.620
BY STRAIGHT LINE TO	2973791.840	231637.530
BY STRAIGHT LINE TO	2974855.500	232126.290
BY STRAIGHT LINE TO	2975886.050	232563.650

19a

BY ARC CENTERED AT	2954522.400	282902.860
TO	2979713.960	234366.000
BY STRAIGHT LINE TO	2981251.110	235163.810
BY ARC CENTERED AT	2962694.900	286604.150
TO	2983148.800	235888.480
BY STRAIGHT LINE TO	2985123.210	236684.770
BY ARC CENTERED AT	2964669.310	287400.440
TO	2987350.630	237641.030
BY STRAIGHT LINE TO	2989974.540	238837.060
BY ARC CENTERED AT	2967293.220	288596.470
TO	2991504.860	239563.440
BY STRAIGHT LINE TO	2992692.050	240149.650
BY STRAIGHT LINE TO	2994157.460	240845.210
BY ARC CENTERED AT	2970708.630	290247.580
TO	2996836.490	242208.260
BY ARC CENTERED AT	2975121.040	292396.710
TO	2998927.060	243165.470
BY STRAIGHT LINE TO	3001943.270	244623.970
BY STRAIGHT LINE TO	3005992.320	246501.780
BY STRAIGHT LINE TO	3006383.000	246669.180
BY ARC CENTERED AT	2984845.740	296934.360
TO	3010364.330	248568.640
BY STRAIGHT LINE TO	3012157.230	249514.600
BY STRAIGHT LINE TO	3012669.720	249751.240
BY STRAIGHT LINE TO	3015766.180	251135.710
BY ARC CENTERED AT	2993445.230	301057.820
TO	3018223.300	252308.580
BY STRAIGHT LINE TO	3020665.560	253549.920
BY STRAIGHT LINE TO	3023218.950	254739.210
BY ARC CENTERED AT	3000130.070	304310.830
TO	3025066.900	255642.610
BY STRAIGHT LINE TO	3027348.820	256811.830
BY ARC CENTERED AT	3002411.990	305480.050
TO	3028551.970	257447.320
BY STRAIGHT LINE TO	3032126.990	259392.890

20a

BY STRAIGHT LINE TO	3034886.150	260872.740
BY ARC CENTERED AT	3011486.350	310298.350
TO	3036787.320	261818.430
BY STRAIGHT LINE TO	3040213.090	263606.290
BY ARC CENTERED AT	3014912.120	312086.210
TO	3042854.470	265079.120
BY STRAIGHT LINE TO	3043391.400	265398.290
BY STRAIGHT LINE TO	3044340.600	265915.800
BY STRAIGHT LINE TO	3045260.030	266396.740
BY ARC CENTERED AT	3019913.320	314852.760
TO	3050465.910	269498.810
BY STRAIGHT LINE TO	3050938.340	269775.110
BY ARC CENTERED AT	3023330.840	316979.640
TO	3052959.320	271016.670
BY STRAIGHT LINE TO	3053570.440	271410.610
BY STRAIGHT LINE TO	3054073.930	271681.910
BY ARC CENTERED AT	3028133.560	319822.730
TO	3055171.330	272289.580
BY STRAIGHT LINE TO	3056933.050	273291.680
BY ARC CENTERED AT	3029895.280	320824.830
TO	3057177.250	273431.420
BY STRAIGHT LINE TO	3059433.260	274730.090
BY ARC CENTERED AT	3032151.290	322123.500
TO	3062556.130	276670.370
BY STRAIGHT LINE TO	3062977.270	276952.080
BY ARC CENTERED AT	3036185.280	324624.200
TO	3064898.830	278084.180
BY STRAIGHT LINE TO	3067021.350	279393.700
BY ARC CENTERED AT	3038307.800	325933.720
TO	3069004.830	280677.400
BY STRAIGHT LINE TO	3069637.340	281067.730
BY ARC CENTERED AT	3043468.560	329084.770
TO	3073035.950	283082.470
BY STRAIGHT LINE TO	3074010.760	283709.020
BY STRAIGHT LINE TO	3075822.560	284817.110

21a

BY ARC CENTERED AT	3047290.570	331468.660
TO	3073656.890	286673.620
BY STRAIGHT LINE TO	3079619.950	287347.970
BY ARC CENTERED AT	3049567.270	333034.710
TO	3079702.580	287402.430
BY STRAIGHT LINE TO	3082003.660	288922.050
BY ARC CENTERED AT	3054525.300	336201.870
TO	3085421.450	291081.260
BY STRAIGHT LINE TO	3088773.840	293376.800
BY STRAIGHT LINE TO	3090741.410	294610.440
BY ARC CENTERED AT	3061692.160	340941.670
TO	3092340.220	295652.180
BY STRAIGHT LINE TO	3094116.700	296854.350
BY ARC CENTERED AT	3063468.640	342143.840
TO	3095040.470	297493.410
BY STRAIGHT LINE TO	3095430.140	297768.940
BY STRAIGHT LINE TO	3096912.310	298585.120
BY ARC CENTERED AT	3070534.190	346487.480
TO	3098138.840	299281.290
BY STRAIGHT LINE TO	3100464.140	300641.050
BY ARC CENTERED AT	3072859.490	347847.240
TO	3101787.990	301440.520
BY ARC CENTERED AT	3076027.690	349677.940
TO	3104438.060	302952.230
BY STRAIGHT LINE TO	3106979.340	304497.390
BY ARC CENTERED AT	3078568.970	351223.100
TO	3108249.870	305293.960
BY STRAIGHT LINE TO	3109812.630	306303.870
BY STRAIGHT LINE TO	3110194.100	306530.950
BY ARC CENTERED AT	3085475.680	355310.470
TO	3112099.850	307544.430
BY STRAIGHT LINE TO	3113786.380	308484.480
BY ARC CENTERED AT	3087162.210	356250.520
TO	3116712.170	310237.030
BY STRAIGHT LINE TO	3117589.020	310800.150

22a

BY STRAIGHT LINE TO	3118082.780	311090.820
BY ARC CENTERED AT	3090340.260	358216.120
TO	3118621.310	311412.020
BY STRAIGHT LINE TO	3121372.570	313074.450
BY ARC CENTERED AT	3093091.520	359878.550
TO	3123784.330	314619.370
BY STRAIGHT LINE TO	3125238.200	315605.320
BY ARC CENTERED AT	3096351.420	362038.020
TO	3127470.950	317071.180
BY ARC CENTERED AT	3098829.320	363655.500
TO	3128388.830	317648.140
BY STRAIGHT LINE TO	3130157.030	318784.200
BY ARC CENTERED AT	3100597.520	364791.560
TO	3133615.320	321199.510
BY STRAIGHT LINE TO	3134125.290	321585.770
BY STRAIGHT LINE TO	3134198.270	321637.080
BY STRAIGHT LINE TO	3135152.370	322234.400
BY ARC CENTERED AT	3106134.000	368584.970
TO	3136413.270	323048.090
BY ARC CENTERED AT	3112530.430	372242.110
TO	3143150.490	326933.680
BY STRAIGHT LINE TO	3147344.680	329768.170
BY STRAIGHT LINE TO	3151130.960	332331.990
BY ARC CENTERED AT	3120469.880	377612.660
TO	3151869.500	332840.960
BY STRAIGHT LINE TO	3154262.980	334519.580
BY STRAIGHT LINE TO	3154408.100	334609.950
BY ARC CENTERED AT	3125499.620	381029.140
TO	3156953.120	336295.270
BY STRAIGHT LINE TO	3157670.040	336799.350
BY STRAIGHT LINE TO	3159482.250	337125.970
BY ARC CENTERED AT	3149782.580	390943.790
TO	3160057.260	337232.780
BY STRAIGHT LINE TO	3168664.390	342866.180
BY ARC CENTERED AT	3138717.000	388622.000

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TO	3172530.430	345644.170
BY STRAIGHT LINE TO	3177771.360	349048.780
BY ARC CENTERED AT	3147981.000	394907.000
TO	3178426.110	349480.830
BY STRAIGHT LINE TO	3184351.110	353451.830
BY ARC CENTERED AT	3153906.000	398878.000
TO	3185298.270	354101.140
BY STRAIGHT LINE TO	3196291.270	361808.140
BY ARC CENTERED AT	3164899.000	406585.000
TO	3197099.170	362385.560
BY STRAIGHT LINE TO	3203248.120	366865.190
BY STRAIGHT LINE TO	3203445.000	366995.000
BY STRAIGHT LINE TO	3205263.990	368189.780
BY ARC CENTERED AT	3182950.000	418115.000
TO	3213258.850	372597.800
BY STRAIGHT LINE TO	3214102.850	373159.800
BY ARC CENTERED AT	3183794.000	418677.000
TO	3230735.560	390624.700
BY STRAIGHT LINE TO	3234005.440	393622.130
BY ARC CENTERED AT	3191421.540	427930.340
TO	3235623.940	395734.230
BY STRAIGHT LINE TO	3235703.680	395823.380
BY STRAIGHT LINE TO	3236968.730	397155.570
BY STRAIGHT LINE TO	3237336.470	397529.310
BY STRAIGHT LINE TO	3237447.590	397632.950
BY ARC CENTERED AT	3203126.420	440206.400
TO	3239992.950	399817.040
BY STRAIGHT LINE TO	3243250.850	402790.780
BY ARC CENTERED AT	3206384.320	443180.140
TO	3243687.070	403193.310
BY STRAIGHT LINE TO	3244158.230	403632.840
BY ARC CENTERED AT	3209175.210	445664.140
TO	3244505.920	403924.680
BY STRAIGHT LINE TO	3247383.500	406360.430
BY STRAIGHT LINE TO	3248550.260	407332.580

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BY STRAIGHT LINE TO	3250566.680	409015.370
BY ARC CENTERED AT	3215528.190	451000.440
TO	3251544.470	409851.090
BY STRAIGHT LINE TO	3252539.180	410721.710
BY STRAIGHT LINE TO	3253180.840	411216.120
BY ARC CENTERED AT	3219804.150	454534.000
TO	3256039.510	413577.440
BY STRAIGHT LINE TO	3256601.470	414074.630
BY STRAIGHT LINE TO	3258779.810	415787.870
BY ARC CENTERED AT	3224973.600	458771.370
TO	3260398.810	417112.080
BY STRAIGHT LINE TO	3261666.450	418190.020
BY STRAIGHT LINE TO	3263134.150	419399.800
BY ARC CENTERED AT	3228352.030	461597.500
TO	3265357.350	421335.260
BY STRAIGHT LINE TO	3265683.050	421566.250
BY STRAIGHT LINE TO	3267865.630	422928.010
BY ARC CENTERED AT	3238918.550	469323.140
TO	3284820.550	439600.280
BY STRAIGHT LINE TO	3285244.500	440255.000
BY ARC CENTERED AT	3239342.500	469977.860
TO	3288053.370	445124.430
BY STRAIGHT LINE TO	3288295.590	445337.940
BY STRAIGHT LINE TO	3290052.170	446826.760
BY STRAIGHT LINE TO	3293012.610	449248.210
BY ARC CENTERED AT	3258390.270	491577.100
TO	3293509.770	449659.770
BY STRAIGHT LINE TO	3295639.350	451443.990
BY STRAIGHT LINE TO	3299972.020	454715.540
BY ARC CENTERED AT	3267019.120	498356.660
TO	3300771.900	455331.180
BY STRAIGHT LINE TO	3304170.660	457997.450
BY STRAIGHT LINE TO	3306387.000	459641.100
BY STRAIGHT LINE TO	3315159.420	466351.910
BY STRAIGHT LINE TO	3320930.060	470563.630

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BY STRAIGHT LINE TO	3328194.780	475602.400
BY STRAIGHT LINE TO	3332182.650	478117.310
BY ARC CENTERED AT	3300182.310	522461.640
TO	3337137.810	482153.660
BY ARC CENTERED AT	3304106.530	525735.500
TO	3338662.180	483352.150
BY ARC CENTERED AT	3306777.090	527779.420
TO	3339969.760	484320.380
BY STRAIGHT LINE TO	3341183.900	485247.700
BY STRAIGHT LINE TO	3342310.160	485999.640
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TO	3344961.070	487885.870
BY STRAIGHT LINE TO	3345445.170	488252.500
BY ARC CENTERED AT	3315104.830	533748.710
TO	3346381.780	488891.230
BY STRAIGHT LINE TO	3348601.610	490439.010
BY ARC CENTERED AT	3317324.660	535296.490
TO	3348789.000	490570.250
BY STRAIGHT LINE TO	3352514.640	493191.190
BY ARC CENTERED AT	3321050.300	537917.430
TO	3353540.970	493931.100
BY STRAIGHT LINE TO	3356490.310	496109.640
BY STRAIGHT LINE TO	3358425.620	497510.560
BY STRAIGHT LINE TO	3358658.460	497656.240
BY STRAIGHT LINE TO	3359006.390	497860.940
BY ARC CENTERED AT	3331276.600	544993.740
TO	3363039.620	500479.110
BY STRAIGHT LINE TO	3364052.810	501202.060
BY STRAIGHT LINE TO	3365123.820	501931.140
BY ARC CENTERED AT	3334351.130	547136.040
TO	3367637.520	503748.740
BY ARC CENTERED AT	3337714.340	549520.400
TO	3368482.930	504312.710
BY STRAIGHT LINE TO	3369268.290	504847.230
BY ARC CENTERED AT	3338499.700	550054.920

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TO	3369800.950	505214.390
BY STRAIGHT LINE TO	3372559.410	507272.000
BY ARC CENTERED AT	3338499.700	550054.920
TO	3373614.500	508133.660
BY STRAIGHT LINE TO	3376365.190	510437.740
BY ARC CENTERED AT	3341250.390	552359.000
TO	3377774.640	511659.850
BY STRAIGHT LINE TO	3380903.730	514467.960
BY ARC CENTERED AT	3344379.480	555167.110
TO	3384860.870	518401.660
BY STRAIGHT LINE TO	3385537.490	519146.670
BY STRAIGHT LINE TO	3386633.810	520042.560
BY STRAIGHT LINE TO	3388591.970	521628.810
BY ARC CENTERED AT	3347926.000	558190.000
TO	3393315.840	527690.750
BY STRAIGHT LINE TO	3394122.840	528891.750
BY ARC CENTERED AT	3348733.000	559391.000
TO	3399047.490	537969.190
BY STRAIGHT LINE TO	3399847.490	539848.190
BY ARC CENTERED AT	3349533.000	561270.000
TO	3401544.000	544379.250
BY STRAIGHT LINE TO	3402301.000	546710.250
BY ARC CENTERED AT	3350290.000	563601.000
TO	3404498.140	556395.490
BY STRAIGHT LINE TO	3404679.220	557757.790
BY STRAIGHT LINE TO	3405302.700	558362.900
BY STRAIGHT LINE TO	3407136.430	559951.320
BY STRAIGHT LINE TO	3409313.420	561569.860
BY STRAIGHT LINE TO	3413751.663	564517.350
BY STRAIGHT LINE TO	3416817.303	566362.990
BY ARC CENTERED AT	3362234.900	569710.060
TO	3416828.504	566550.958
BY STRAIGHT LINE TO	3418699.836	567713.079
BY STRAIGHT LINE TO	3421382.821	569170.219
BY ARC CENTERED AT	3395283.920	617225.280

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TO	3423152.926	570174.668
BY STRAIGHT LINE TO	3425613.944	571632.378
BY STRAIGHT LINE TO	3428804.780	573341.880
BY STRAIGHT LINE TO	3432075.460	575071.310
BY STRAIGHT LINE TO	3437335.520	577761.390
BY ARC CENTERED AT	3412435.990	626448.710
TO	3437610.350	577902.930
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BY ARC CENTERED AT	3414162.740	627344.150
TO	3440728.600	579545.650
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BY STRAIGHT LINE TO	3445418.780	582040.680
BY STRAIGHT LINE TO	3447864.630	583212.770
BY STRAIGHT LINE TO	3450072.100	584201.860
BY ARC CENTERED AT	3427711.710	634106.320
TO	3453214.910	585732.480
BY STRAIGHT LINE TO	3454433.220	586374.790
BY STRAIGHT LINE TO	3455501.290	586908.130
BY ARC CENTERED AT	3431070.770	635832.470
TO	3458042.990	588262.090
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BY ARC CENTERED AT	3435900.240	638305.040
TO	3461841.100	590164.480
BY STRAIGHT LINE TO	3462462.880	590465.590
BY ARC CENTERED AT	3438628.430	639683.070
TO	3463035.280	590746.920
BY ARC CENTERED AT	3441833.750	641154.620
TO	3465438.840	591826.720
BY STRAIGHT LINE TO	3468650.230	593363.480
BY ARC CENTERED AT	3445045.140	642691.380
TO	3469131.740	593596.800
BY STRAIGHT LINE TO	3471228.450	594625.480
BY ARC CENTERED AT	3447141.850	643720.060
TO	3471362.930	594691.690
BY STRAIGHT LINE TO	3474132.030	596059.680

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BY STRAIGHT LINE TO	3475825.280	596817.210
BY ARC CENTERED AT	3453493.380	646734.420
TO	3476645.540	597192.330
BY ARC CENTERED AT	3456899.830	648187.900
TO	3482481.740	599855.640
BY STRAIGHT LINE TO	3484420.060	600717.360
BY ARC CENTERED AT	3462205.110	650686.730
TO	3484641.120	600816.230
BY STRAIGHT LINE TO	3486522.310	601662.550
BY ARC CENTERED AT	3464086.300	651533.050
TO	3487016.090	601887.640
BY STRAIGHT LINE TO	3491235.290	603836.370
BY STRAIGHT LINE TO	3496213.220	606059.140
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TO	3497951.440	606872.170
BY STRAIGHT LINE TO	3498685.120	607231.160
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BY STRAIGHT LINE TO	3508779.890	611990.260
BY ARC CENTERED AT	3485544.270	661493.260
TO	3511159.360	613178.580
BY STRAIGHT LINE TO	3511659.620	613443.800
BY STRAIGHT LINE TO	3512941.260	614091.050
BY STRAIGHT LINE TO	3515304.430	615170.310
BY ARC CENTERED AT	3492586.860	664913.190
TO	3516475.520	615722.000
BY STRAIGHT LINE TO	3518706.360	616805.360
BY ARC CENTERED AT	3494817.700	665996.550
TO	3520121.670	617518.200
BY STRAIGHT LINE TO	3521945.880	618470.370
BY STRAIGHT LINE TO	3526935.900	620807.280
BY ARC CENTERED AT	3503743.370	670330.490
TO	3528200.310	621419.350
BY STRAIGHT LINE TO	3530772.900	622705.720
BY STRAIGHT LINE TO	3533312.180	623738.220
BY ARC CENTERED AT	3512714.270	674395.570

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TO	3536696.410	625249.880
BY STRAIGHT LINE TO	3539974.040	626849.300
BY ARC CENTERED AT	3515991.900	675994.990
TO	3540926.870	627325.810
BY STRAIGHT LINE TO	3544631.920	629224.040
BY ARC CENTERED AT	3519696.950	677893.220
TO	3545186.710	629512.300
BY STRAIGHT LINE TO	3548475.960	631245.260
BY ARC CENTERED AT	3522986.200	679626.180
TO	3550505.660	632370.270
BY STRAIGHT LINE TO	3550910.210	632605.860
BY STRAIGHT LINE TO	3552928.580	633669.390
BY STRAIGHT LINE TO	3556148.900	635089.470
BY ARC CENTERED AT	3534084.260	685125.390
TO	3558249.890	636069.670
BY STRAIGHT LINE TO	3560691.670	637272.530
BY ARC CENTERED AT	3536526.040	686328.250
TO	3562430.730	638168.220
BY STRAIGHT LINE TO	3565992.450	640084.020
BY STRAIGHT LINE TO	3566333.520	640255.940
BY STRAIGHT LINE TO	3567170.390	640628.420
BY STRAIGHT LINE TO	3568719.440	641309.230
BY ARC CENTERED AT	3546716.500	691372.310
TO	3571167.010	642457.960
BY STRAIGHT LINE TO	3574070.960	643909.540
BY STRAIGHT LINE TO	3576192.050	644899.490
BY STRAIGHT LINE TO	3578268.450	645805.500
BY ARC CENTERED AT	3556398.640	695926.880
TO	3578815.310	646047.680
BY STRAIGHT LINE TO	3579057.520	646156.530
BY STRAIGHT LINE TO	3579114.000	646175.640
BY ARC CENTERED AT	3561590.160	697976.770
TO	3585716.140	648901.530
BY STRAIGHT LINE TO	3586220.680	649095.240
BY ARC CENTERED AT	3566620.680	700146.990

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TO	3587589.120	649641.880
BY ARC CENTERED AT	3570958.340	701736.590
TO	3588990.640	650110.260
BY STRAIGHT LINE TO	3590333.400	650579.270
BY ARC CENTERED AT	3579572.410	704194.960
TO	3593415.640	651291.210
BY STRAIGHT LINE TO	3593591.250	651337.160
BY STRAIGHT LINE TO	3594647.370	651526.190
BY STRAIGHT LINE TO	3595223.860	651628.040
BY ARC CENTERED AT	3599949.780	706108.380
TO	3601283.300	651439.710
BY STRAIGHT LINE TO	3602145.680	651460.750
BY ARC CENTERED AT	3603850.670	706119.090
TO	3604799.560	651442.390
BY ARC CENTERED AT	3608144.610	706024.920
TO	3605182.710	651420.260
BY STRAIGHT LINE TO	3606653.510	651340.480
BY ARC CENTERED AT	3609615.410	705945.140
TO	3607866.960	651288.170
BY STRAIGHT LINE TO	3609190.540	651245.830
BY ARC CENTERED AT	3613363.750	705771.290
TO	3611677.920	651112.350
BY ARC CENTERED AT	3623588.450	704484.450
TO	3621803.630	649828.650
BY STRAIGHT LINE TO	3622808.970	649795.820
BY ARC CENTERED AT	3624593.790	704451.620
TO	3622868.200	649793.920
BY STRAIGHT LINE TO	3623427.560	649776.260
BY STRAIGHT LINE TO	3628660.560	649850.580
BY ARC CENTERED AT	3627884.000	704530.000
TO	3632507.720	650040.890
BY STRAIGHT LINE TO	3634970.720	650249.890
BY ARC CENTERED AT	3630347.000	704739.000
TO	3651367.500	654255.540
BY STRAIGHT LINE TO	3653430.500	655114.540

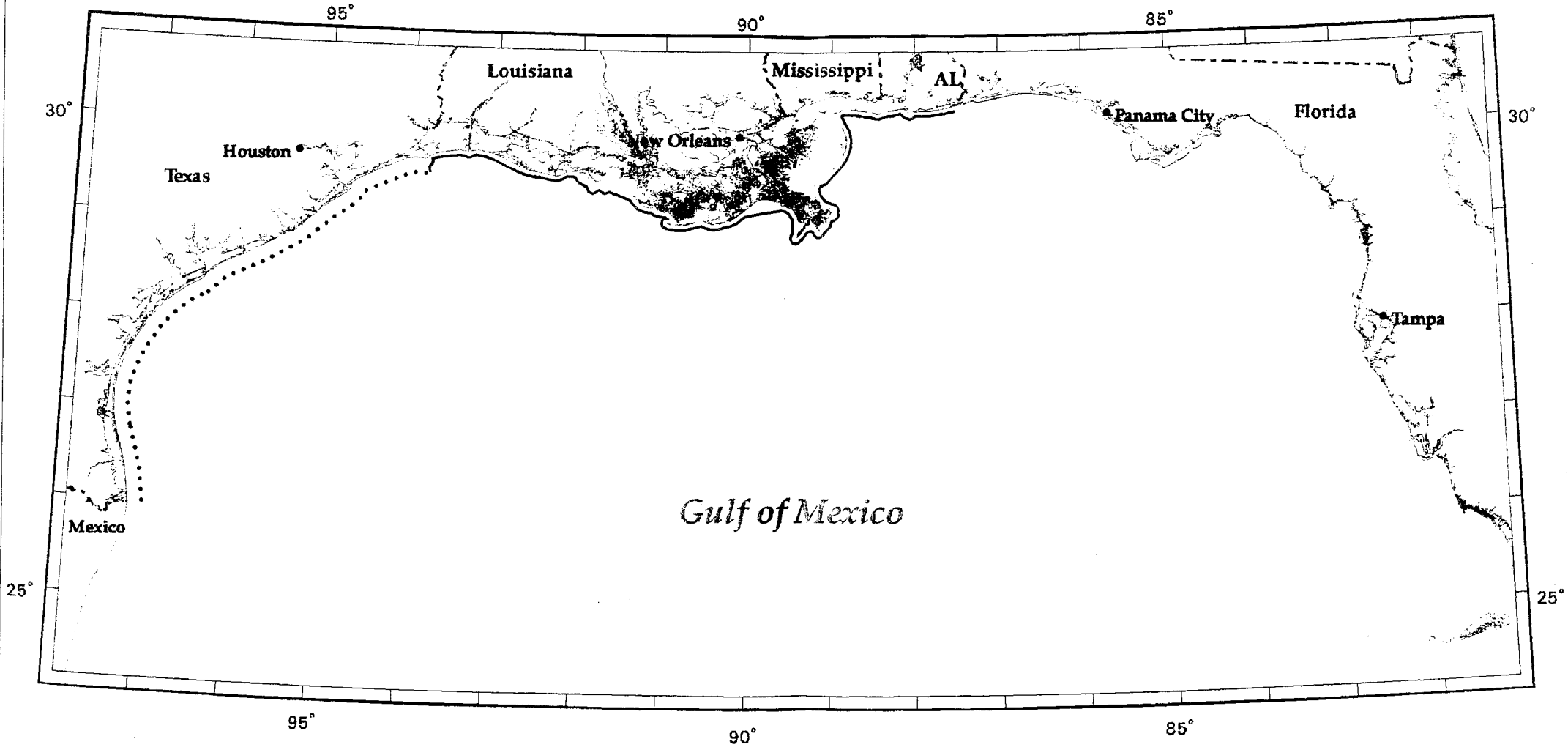
31a

BY ARC CENTERED AT	3632410.000	705598.000
TO	3654596.266	655615.891

4. Plane coordinates refer to the Texas Coordinate Systems, South Zone or South Central Zone, as indicated. All coordinates are referenced to the North American Datum of 1927.

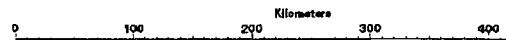
5. The Court retains jurisdiction to entertain such further proceedings, to enter such orders, and to issue such writs as may from time to time be deemed necessary or advisable to give proper force and effect to this decree, or to effectuate the rights of the parties.

Non-Ambulatory Federal/State Boundaries in the Gulf of Mexico



Legend

— Federal/State Boundary fixed by prior Supreme Court Decrees



In the Supreme Court of the United States

OCTOBER TERM, 1997

UNITED STATES OF AMERICA, PLAINTIFF

v.

STATE OF LOUISIANA, ET AL.
(TEXAS BOUNDARY CASE)

ON BILL OF COMPLAINT

**JOINT MOTION FOR ENTRY OF A SUPPLEMENTAL
DECREE, MEMORANDUM IN SUPPORT OF JOINT
MOTION FOR A SUPPLEMENTAL DECREE, AND
PROPOSED SUPPLEMENTAL DECREE**

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the State of Texas

Counsel of Record for
the United States

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