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**Indigenous & Environmental Groups Seek Injunction to Immediately Halt Dredging and Other Construction Activity at Moda Oil Export Facility**

Corpus Christi, TX- Attorneys for the Indigenous Peoples of the Coastal Bend, Karankawa Kadla Tribe of the Texas Gulf Coast, and Ingleside on the Bay Coastal Watch Association have filed a Motion for a Preliminary Injunction, asking the court to prevent dredging, or any construction, associated with the permit granted by the U. S. Army Corps of Engineers (“the Corps”) for expansion of the Moda Midstream crude oil export facility on Corpus Christi Bay.

The motion follows a complaint filed on August 3rd against the Corps in federal court. This lawsuit was pursued due to a permit that was given to Moda, which allows its operations to expand into an undeveloped area sacred to local Indigenous people, without addressing environmental and community concerns as required under the National Environmental Policy Act, the Clean Water Act, and Administrative Procedure Act.

“We want to prevent any disturbance of cultural artifacts of my ancestors that could occur, if the court does not act now to stop Moda. If they continue their operation of dredging in areas where thousands of Karankawa artifacts have already been found, this will further contribute to the genocide of my ancestors’ history,” said Love Sanchez. “The land and water are important to our culture. Destroying something so sacred without properly evaluating its impacts to the environment or people, is an act of negligence and erasure of indigenous people,” Sanchez continued.



*Figure: McGloin's Bluff Karankawan Archaeological Site in path of Proposed Pier  
Photo Credit: Kathryn Masten*

"If Moda proceeds, they will irreparably damage sensitive sport fishing marine environments before we have our day in court. Once vital seagrasses and historical artifacts are destroyed, it is impossible to put them back together." stated Jennifer Hilliard, Treasurer of Ingleside on the Bay Coastal Watch Association. "The Army Corps of Engineers granted this permit without considering the full impacts on our local community. I live with a view of this beautiful bay and my heart stops every time I see a dredger move near the Moda terminal."



*Figure: Congested Ship Traffic at Moda next to Ingleside on the Bay Business and Residential Piers  
Photo Credit: Patrick Nye*

The Moda Terminal is the largest export terminal in the U.S. by volume, averaging about 24% of all U.S. crude oil exports. The proposed expansion would double the terminal's capacity for oil tankers and barges.

The case has been assigned to Judge Drew Tipton in the Southern District of Texas, Corpus Christi Division. The plaintiffs are represented by [Perales, Allmon & Ice, P.C.](#) and [Waltzer Wiygul & Garside LLC](#). Click [HERE](#) for a copy of the preliminary injunction.