



BOBBY JINDAL
GOVERNOR

State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF CONSERVATION

STEPHEN CHUSTZ
INTERIM SECRETARY
JAMES H. WELSH
COMMISSIONER OF CONSERVATION

November 15, 2012

Mr. Mark Cartwright
Texas Brine Company, L.L.C.
4800 San Felipe
Houston, Texas 77056

Re: November 14, 2012 Bayou Corne Community Monitoring Work Plan Revision 2
October 11, 2012 Third Amendment to Declaration of Emergency and Directive, Directive No. 2

Dear Mr. Cartwright:

This letter acknowledges receipt of the referenced revised work plan (Plan) and verifies that the suggested changes (copy enclosed) were included in the Plan. All terms and conditions set forth in the agency's conditional approval dated October 31, 2012 (enclosed) remain in effect. Failure to timely implement action toward compliance with this matter may lead to the issuance of additional orders demanding compliance and civil penalties.

With kind regards,

James H. Welsh
Commissioner of Conservation

Texas Brine Company, L.L.C.

November 8, 2012 Bayou Corne Community Monitoring Work Plan (Revision 1)

Suggested Changes

Page 1, paragraph 2, line 4: Change “pressure monitoring wells” to “observation / relief wells”.

Page 3, paragraph 5, last sentence: Reword to state “Pressure gauging will be conducted using two pressure gauge/air sampling assemblies in sequence. The first gauge to be used will have a range of 0 to 30 psi. If the no pressure is indicated, or the pressure is below 5 psi, then a second gauge with a range of 0 to 5 psi will be used. The well head will include a valve for gas venting, if it becomes necessary.”

Page 7, paragraph 7, sentence 2: Add “TPH-Oil Range Organics (TPH-ORO)” to TPH-GRO and TPH-DRO.

Page 10, paragraph 2: Remove this paragraph as the issue of sampling and testing aquifer conditions to comply with the Directive 7 will be addressed in the TBC groundwater monitoring plan.

Page 10, paragraph 3, last sentence: Insert at the end of the sentence “using the two pressure gauge/air sampling assemblies, as appropriate. The % methane will be measured using the pressure gauging/air sampling assembly and a LANDTEC GEM™2000 Gas Analyzer & Extraction Monitor (Gem2K) , or equivalent. The depth to groundwater shall be measured from the top of casing using an electronic water level indicator. Depths will be recorded to the nearest hundredth of a foot (0.01’). Note that the FID, explosimeter, and oxygen meter will be employed as required for ambient air monitoring and for screening the inside of the well curb box to ensure that conditions remain acceptable for personnel. This will be followed by the pressure gauging, % methane readings, and finally the water level measurements.”

Page 10, paragraph 5, last sentence: Insert at the end of the sentence “using the two pressure gauge/air sampling assemblies, as appropriate. The % methane will be measured using the pressure gauging/air sampling assembly and a LANDTEC GEM™2000 Gas Analyzer & Extraction Monitor (Gem2K) , or equivalent. The depth to groundwater shall be measured from the top of casing using an electronic water level indicator. Depths will be recorded to the nearest hundredth of a foot (0.01’). Note that the FID, explosimeter, and oxygen meter will be employed as required for ambient air monitoring and for screening the inside of the well curb box to ensure that conditions remain acceptable for personnel. This will be followed by the pressure gauging, % methane readings, and finally the water level measurements.”

Page 11, paragraph 1: Add a new sentence after sentence 1 that states, “Field data measurements will be reported weekly to LDNR in Excel format.”

Change all references to “The Shaw Group” to Shaw Environmental & Infrastructure, Inc.



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October 31, 2012

STEPHEN CHUSTZ
INTERIM SECRETARY
JAMES H. WELSH
COMMISSIONER OF CONSERVATION

Mr. Mark Cartwright
Texas Brine Company, L.L.C.
4800 San Felipe
Houston, Texas 77056

Re: **October 29, 2012 Bayou Corne Community Monitoring Work Plan**

Dear Mr. Cartwright:

The Office of Conservation and Shaw Environmental & Infrastructure, Inc. have completed review of the referenced Texas Brine Company, L.L.C. (TBC) October 29, 2012 Bayou Corne Community Monitoring Plan.

Conditional approval is granted provided that TBC meets the terms listed below:

1. Geoprobos shall be installed, maintained, and plugged and abandoned in accordance with the applicable water well requirements of LAC 56:Part I.
2. Geoprobos shall be installed, and maintained, in a manner that sufficiently meets their intended purpose, i.e., "to permit water quality monitoring and gas pressure monitoring in the aquitard overlaying the MRAA."
3. Differential elevation surveys on all community benchmarks shall be conducted in a manner consistent with La. DOTD survey methods used to evaluate subsidence on Highway 70.
4. Pressure monitor wells installed in the community shall be installed, and maintained, in a manner sufficient to accurately gauge aquifer pressure at all times and may be used as deemed appropriate to determine aquifer water level or for collection of water quality sampling and testing.
5. All drilling activity into the MRAA must be performed in a manner that will safely control release of natural gas to the atmosphere and protect site workers and the public.

Be advised that this conditional approval is the complete and final determination of the agency regarding TBC's plan submitted pursuant to Directive Order No. 2 of the October 11, 2012 Office of Conservation Third Amendment to Declaration of Emergency and Directive. This conditional approval shall not be construed or otherwise implied to represent agency acceptance, approval, or revision to any previous written or verbally expressed comment from the agency or its consultant, with respect to any aspect of the groundwater monitoring plan under consideration submitted by TBC in response to the October 11, 2012 Office of Conservation Third Amendment to Declaration of Emergency and Directive Order No. 7.

With kind regards,

James H. Welsh

Commissioner of Conservation