



# Texas Brine Company, LLC

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Belle Rose, LA 70341  
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January 23, 2013

Commissioner James H. Welsh  
P.O. Box 94275  
Baton Rouge, LA 70804

**RE: In response to State of Louisiana Department of Natural Resources Office of Conservation's Second Amendment to Declaration of Emergency and Directive**

Commissioner Welsh,

In response to the Second Amendment and Declaration of Emergency and Directive order issued by the Louisiana Department of Natural Resources (LDNR), Office of Conservation on September 25, 2012, Texas Brine Company, LLC (TBC) understands the seven items listed in the document.

In the above mentioned, TBC was specifically directed and ordered to perform certain tasks outlined in the above mentioned document. Below are the required responses, as directed.

1. TBC's counsel provided LDNR legal counsel with a response to Directives 1-3 on September 28, 2012.
2. TBC understands Directive 4, which is to provide all daily logs and field notes from all contractors conducting investigation into subsidence and natural gas bubbling. The Daily Action Summary and results for current information can be found in the Attachment section of this report.
3. TBC understands Directive 5, which directs TBC to immediately allow for split or share any sample taken on site related to Well 3A (Serial Number 974265), the cavern, other wells facilities or other site locations. The Daily Action Summary of today's collection can be found in Attachment section of this report.
4. TBC understands Directive 6, which directs TBC to immediately report the results (final and preliminary) of any tests, logs samples or data collection performed on Well 3A, the cavern, other wells, facilities or site locations that indicate a change in any previously known conditions related to the investigation of the subsidence or natural gas bubbling

events, and continue to report any such results. The Daily Action Summary and the Results related to this Directive can be found in Attachment section of this report.

5. TBC understands the Directive 7, which states that TBC will provide a daily summary of all tests, or logs performed or samples taken from Well 3A and the cavern as well as any results of those tests or logs, including preliminary as of September 25, 2012 and going forward. The Daily Summary and Results related to this Directive can be found in Attachment section of this report.

Please note that the drilling rig used for the Observation Well 3A has been removed and the site is being rigged down and returned to pre-drilling condition. As such, daily drilling reports for this well have ceased. Plans are being made for longer term potential gas venting/flaring requirements and possible hydrocarbon material recover from Well 3A.

In addition, previous daily summary reports issued to LDNR have included significant duplicate information as there is a fair amount of overlap in the information requested in each of the Directives included in the September 25, 2012 order. All requested information associated with the Directives issued in the September 25, 2012 order are included in the Attachment section of this report.

TBC believes that the submittal of this report satisfies the requirements of the Declaration of Emergency and Directive issued on September 25, 2012. As directed this report is submitted by email to [conservationorder@la.gov](mailto:conservationorder@la.gov), ref. "Emergency Declaration-Texas Brine Company LLC-9/25/2012.



Bruce E. Martin

Vice President, Operations

Texas Brine Company, LLC

## **Summary Table for Daily Events**



## **Attachments**

## **Daily Action Summary**

**January 22, 2013**

### **Stationary Air Monitoring**

- Steve Shaughnessy onsite from 07:30 to 08:45. Changed out the monitors between 07:51 and 08:30. Collected data from the monitoring database and forwarded to Eric Rucinski in the Baton Rouge office for processing.
- Shane Rojas of Code Red (monitor sub-contractor) onsite from 07:00 to 17:00. Assisted in battery change outs and maintenance of the monitoring equipment.

### **Residential Air Monitoring**

- Not Scheduled

### **Gas Seep Sampling**

- Not Scheduled

### **Well Gas Sampling**

- Not Scheduled

### **Air Indoor Monitoring**

- Not Scheduled

Texas Brine - Belle Rose, Louisiana  
Hourly Air Monitoring Data

\*Time indicates start of time period (ex. 12:00:00 AM gives the time period 12:00:00 AM to 12:59:59 AM)

Date-Time *	South-most Pipeline Site					Middle-most Pipeline Site					North-most Pipeline Site					On Drill Rig Boom				Relief Well					
	AM-3					AM-2					AM-1					OG 3A-1				RW-1					
	CO (ppm)	Non-Methane VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	CO (ppm)	Non-Methane VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	CO (ppm)	Non-Methane VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	SO2 (ppm)	Non-Methane VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	CO (ppm)	Non-Methane VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)
01/22/2013 01:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.5	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
01/22/2013 02:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.5	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
01/22/2013 03:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.5	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
01/22/2013 04:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.4	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
01/22/2013 05:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.4	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
01/22/2013 06:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	<1.0	1.2	20.4	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
01/22/2013 07:00:00 AM	0.0	0.0	0.0	0.0	20.9	<1.0	<1.0	<1.0	2.6	20.4	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
01/22/2013 08:00:00 AM	<1.0	0.0	0.0	0.0	21.1	<1.0	<1.0	<1.0	0.0	20.9	0.0	0.0	3.0	0.0	21.0	0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
01/22/2013 09:00:00 AM	0.0	0.0	0.0	0.0	20.9	<1.0	<1.0	<1.0	0.0	20.9	0.0	0.0	4.0	0.0	21.1	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
01/22/2013 10:00:00 AM	0.0	0.0	0.0	0.0	20.9	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	21.0	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
01/22/2013 11:00:00 AM	0.0	0.0	0.0	0.0	21.2	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	21.2	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
01/22/2013 12:00:00 PM	0.0	0.0	0.0	0.0	21.3	<1.0	<1.0	<1.0	0.0	21.1	<1.0	0.0	<1.0	0.0	21.3	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	21.0
01/22/2013 01:00:00 PM	0.0	0.0	0.0	0.0	21.3	<1.0	<1.0	<1.0	0.0	21.0	<1.0	0.0	<1.0	0.0	21.3	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	21.2
01/22/2013 02:00:00 PM	0.0	0.0	0.0	0.0	21.3	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	21.4	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	21.0
01/22/2013 03:00:00 PM	0.0	0.0	0.0	0.0	21.3	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	21.4	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
01/22/2013 04:00:00 PM	0.0	0.0	0.0	0.0	21.3	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	21.3	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
01/22/2013 05:00:00 PM	0.0	0.0	0.0	0.0	21.3	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	21.3	0.0	0.0	0.0	0.0	21.2	0.0	0.0	<1.0	0.0	21.2
01/22/2013 06:00:00 PM	0.0	0.0	0.0	0.0	21.2	<1.0	<1.0	<1.0	0.0	21.1	<1.0	0.0	<1.0	0.0	21.2	0.0	0.0	0.0	0.0	21.0	0.0	0.0	<1.0	0.0	20.9
01/22/2013 07:00:00 PM	0.0	0.0	0.0	0.0	21.2	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	21.2	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
01/22/2013 08:00:00 PM	<1.0	0.0	0.0	0.0	21.1	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	21.2	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
01/22/2013 09:00:00 PM	0.0	0.0	0.0	0.0	21.1	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	21.2	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
01/22/2013 10:00:00 PM	0.0	0.0	0.0	0.0	21.1	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	0.0	0.0	21.2	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
01/22/2013 11:00:00 PM	0.0	0.0	0.0	0.0	20.9	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
01/23/2013 12:00:00 AM	0.0	0.0	0.0	0.0	20.9	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9

NOTES:

At AM-1 an extra monitor change-out occurred due to VOC sensor failure on RTU\_6. RTU\_7 replaced RTU\_6 at 10:01.  
Elevated H2S readings were recorded while RTU\_6 was located at AM-1. H2S readings returned to <1.0 when RTU\_6 was replaced by RTU\_7.  
RTU\_6 is being shipped off-site for service.

# RESPEC Consulting & Services

Texas Brine, L.L.C.

Assumption Parish, Louisiana

Daily Field Report

Report By: David Gnage

Date: 1/22/13

Company: RESPEC

Work Order #:           ()

Personnel	Company	Job Title
David Gnage	RESPEC	Staff Geologist

**Time Onsite:** Start Time: 14:30 End Time: 17:00

(Note: on-site time only reflects time on-site; it does not reflect time taken for off-site activities)

**Equipment Onsite:** hand tools, hardware, laptop (s);

**Daily Activity:** Mobilized to site to recon impacts of recent movement on current instrument and coordinate with Fenstermaker and Miller on subsidence survey. RESPEC view and documented potential effects of PAD#3 tension cracks on Pad#3 water level instrumentation. Reconnoitered potential new locations. Spoke with TBC staff regarding fabrication of an extension of the antenna mount on the shop. Reviewed geoprobe locations with Walker-Hill.

**Proposed Schedule:** January 23 meet with Fenstermaker and Miller Eng. January 24<sup>th</sup> install new antenna mount. A representative will provide drilling oversight for TBC-LA15 & TBC-LA16 (CrossTex Geophone casings) when site access is granted.

Initials: DJG

## **ME&A Daily Action Summary**

January 22, 2013

### **Subsidence Survey:**

- No Work Done

### **Sinkhole Perimeter/Hydrographic Survey:**

- No Work Done

### **Support Sinkhole Cleanup**

- No Work Done

### **Misc. Survey Work**

- Arrived @ 7:30 am
- Cross section Rig Road and locate/tie in pipelines in area for containment system
- Departed @ 3:00 pm

# Michael Pisani & Associates

Texas Brine, L.L.C.

Assumption Parish, Louisiana

## Daily Field Report

Report By: Patrick Ritchie

Company: MP&A

Date: 1/22/2013

Work Order # 80-05

Health and Safety Meeting  YES  NO

Weather: 65 F sunny, clear

<u>Personnel</u>	<u>Company</u>	<u>Job Title</u>
<u>Charles Trahan</u>	<u>MP&amp;A</u>	<u>Geologist</u>
<u>Walker Hill Drill Crew</u>		
<u>Patrick Ritchie</u>	<u>MP&amp;A</u>	<u>Environmental Scientist</u>

Site Activities: Start Time 9:00 End Time 17:30

**Equipment On-site:** GardnerDenver mud rotary rig  
Vac Truck  
Skid steer  
Airboat

### Daily Activity:

Conduct in-situ monitoring surface water transect and industrial water well locations  
Measure water level for the industrial water wells  
Collect laboratory samples from TBC and GG industrial wells  
MRAA-03 was plugged and abandoned  
Drill rig moved to MRAA-01 site and set up to drill

Estimated time of completion:

On-going

### Proposed schedule:

Conduct in-situ monitoring surface water transect and industrial water well locations 1/25/2013  
Measure water level for the industrial water wells 1/25/2013  
Collect groundwater laboratory samples from TBC Geoprobe location #3 1/25/2013  
Measure pressure and water level at TBC Geoprobe locations 1/28/2013  
Begin drilling at MRAA-01 location 1/23/2013

Estimated time of completion:

On-going

Initials: PMR