



# Texas Brine Company, LLC

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Belle Rose, LA 70341  
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February 1, 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 (TPC) 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**

TBC Oxy Grand Bayou Data Management-Environmental								
Contractor	Responsibilities	Collected By	Date Collected	Delivered to Lab	Results from Lab	Laboratory	Method	Date to Agencies
Sage	Stationary Air Monitoring	Steve Shaughnessy - 08:00 - 14:00 Sheldon Guy & Pete Hyatt IV (Code Red) - 07:00 - 17:00	1/31/2013	No	No	No	AreaRAE Monitors	2/1/2013
	Residential Air Monitoring	No work performed	1/31/2013	NA	NA	NA	NA	NA
	Gas Seep Sampling	Steve Shaughnessy - Lead Eric Rucinski - Support 12:40-14:00	1/31/2013	Yes	No	Accutest SPL Isotech	TO15 LGH & Sulfur Isotopic	upon receipt of results from labs
	Well Gas Sampling	No work performed	1/31/2013	NA	NA	NA	NA	NA
	Indoor Air Monitoring	No work performed	1/31/2013	NA	NA	NA	NA	NA
Respec	Inclinometers/Tilt Meters	W. Goodman	2/1/2013		Read from Atlas		NA	NA NA
	InSAR Reflector Installations	No work conducted	No work conducted	1/31/2013	NA		NA	NA NA
	Subsidence Survey-Fenstermaker	No work conducted	No work conducted	1/31/2013	NA		NA	NA NA
	Shallow Geophone Installation	No work conducted	No work conducted	1/31/2013	NA		NA	NA NA
	Deep Geophone Installation	No work conducted	No work conducted	1/31/2013	NA		NA	NA NA
	Amendment #3, Directive #2	Work Completed, no work	Work Completed,	1/31/2013	NA		NA	NA NA
Miller	Weekly Stability Survey	No Work Performed	Jan. 31, 2013	NA	NA	NA	NA	NA
	Misc. Survey Work	Kevin Pichoff	Jan. 31, 2013	NA	NA	NA	NA	NA
	Sinkhole Hydro/Perimeter Survey	No Work Performed	Jan. 31, 2013	NA	NA	NA	NA	NA
Pisani	Surface Water	NA	NA	NA	NA	NA	NA	NA
	Well Water	NA	NA	NA	NA	NA	NA	NA
	Geoprobe Wells	NA	NA	NA	NA	NA	NA	NA
<b>Grand Bayou Well 3A</b>								
Daily Operations at 3A		<u>Summary of Today's events</u>						
		Oxy 3A						
2/1/2013		7am	646.88	2/1/2013				
		Relief Well #1						
2/1/2013		See ORW-01 Flare Spreadsheet						

Laboratory

Lab Contact

Laboratory

Lab Contact

Laboratory

Lab Contact

## **Attachments**

## **Daily Action Summary**

**January 31, 2013**

### **Stationary Air Monitoring**

- Steve Shaughnessy onsite from 08:00 to 14:00. Changed out the monitors between 08:25 and 12:04. Collected data from the monitoring database and forwarded to Jill Martin in the Baton Rouge office for processing.
- Sheldon Guy and Pete Hyatt IV 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**

- Steve Shaughnessy, lead, and Eric Rucinski, support, started the scheduled Gas Seep Sampling at 12:40 and finished at 14:00. The samples were collected from PND-1, which is North of RW-1 and West of the Maintenance Shop. The samples were taken to Accutest/SPL laboratories to be analyzed. Samples will be tested for Light Hydrocarbon Gas (LHG) and Sulfur compounds (S) at the SPL Louisiana laboratory and Toxics (TO15) at the Accutest New Jersey laboratory. Samples were also shipped to Isotech Laboratories in Illinois for isotopic analysis.

### **Well Gas Sampling**

- Not Scheduled

### **Air Indoor Monitoring**

- Not Scheduled



**Gas Seep Sampling Location**

**January 31, 2013**

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 (%)
01/31/2013 01:00:00 AM	0.0	0.0	0.0	3.3	20.5	2.8	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
01/31/2013 02:00:00 AM	0.0	0.0	0.0	3.4	20.5	2.8	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
01/31/2013 03:00:00 AM	0.0	0.0	0.0	3.6	20.5	2.9	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
01/31/2013 04:00:00 AM	0.0	0.0	0.0	3.7	20.5	2.8	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
01/31/2013 05:00:00 AM	0.0	0.0	0.0	3.9	20.5	2.8	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
01/31/2013 06:00:00 AM	0.0	0.0	0.0	4.1	20.5	2.9	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	1.8	20.9
01/31/2013 07:00:00 AM	0.0	0.0	0.0	3.0	20.4	3.3	0.0	<1.0	0.0	20.8	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	2.6	20.8
01/31/2013 08:00:00 AM	<1.0	0.0	0.0	0.0	20.8	4.1	<1.0	<1.0	0.0	20.5	0.0	0.0	0.0	0.0	20.7	0.0	0.0	<1.0	0.0	21.4	0.0	0.0	<1.0	<1.0	20.7
01/31/2013 09:00:00 AM	0.0	<1.0	0.0	0.0	20.5	3.5	0.0	<1.0	0.0	20.5	1.4	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	22.3	<1.0	<1.0	<1.0	0.0	20.9
01/31/2013 10:00:00 AM	0.0	<1.0	0.0	0.0	20.6	3.7	0.0	<1.0	0.0	20.2	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	22.4	<1.0	<1.0	<1.0	0.0	20.9
01/31/2013 11:00:00 AM	0.0	<1.0	0.0	0.0	20.9	3.8	0.0	<1.0	0.0	20.2	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	22.4	0.0	<1.0	0.0	0.0	20.9
01/31/2013 12:00:00 PM	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	22.3	0.0	0.0	0.0	0.0	20.9
01/31/2013 01:00:00 PM	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	21.2	0.0	0.0	0.0	0.0	22.3	0.0	0.0	0.0	<1.0	20.9
01/31/2013 02:00:00 PM	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	21.2	0.0	<1.0	0.0	0.0	22.5	0.0	0.0	0.0	0.0	20.9
01/31/2013 03:00:00 PM	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	21.2	0.0	<1.0	0.0	0.0	22.4	0.0	0.0	0.0	0.0	20.9
01/31/2013 04:00:00 PM	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	21.1	0.0	0.0	<1.0	0.0	22.0	0.0	<1.0	0.0	0.0	20.9
01/31/2013 05:00:00 PM	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	21.2	0.0	0.0	0.0	0.0	20.9
01/31/2013 06:00:00 PM	0.0	<1.0	0.0	0.0	20.6	0.0	0.0	0.0	0.0	20.6	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.7	0.0	0.0	0.0	0.0	20.9
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01/31/2013 11:00:00 PM	0.0	<1.0	0.0	0.0	20.3	0.0	0.0	0.0	0.0	20.5	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.3	0.0	0.0	0.0	1.6	20.9
02/01/2013 12:00:00 AM	0.0	<1.0	0.0	0.0	20.3	0.0	0.0	0.0	0.0	20.5	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.3	0.0	0.0	0.0	1.8	20.9

Texas Brine - Belle Rose, Louisiana  
Hourly Air Monitoring Data

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Date-Time *	South-most Pipeline Site					Middle-most Pipeline Site					North-most Pipeline Site					On Drill Rig Boom					Relief Well										
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01/31/2013 06:00:00 AM	0.0	0.0	0.0	4.1	20.5	2.9	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	
01/31/2013 07:00:00 AM	0.0	0.0	0.0	3.0	20.4	3.3	0.0	<1.0	0.0	20.8	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.8	
01/31/2013 08:00:00 AM	<1.0	0.0	0.0	0.0	20.8	4.1	<1.0	<1.0	0.0	20.5	0.0	0.0	0.0	0.0	20.7	0.0	0.0	<1.0	0.0	21.4	0.0	0.0	<1.0	<1.0	20.7	0.0	0.0	<1.0	<1.0	20.7	
01/31/2013 09:00:00 AM	0.0	<1.0	0.0	0.0	20.5	3.5	0.0	<1.0	0.0	20.5	1.4	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	22.3	<1.0	<1.0	<1.0	0.0	20.9	0.0	0.0	<1.0	<1.0	20.9	
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02/01/2013 12:00:00 AM	0.0	<1.0	0.0	0.0	20.3	0.0	0.0	0.0	0.0	20.5	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.3	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	1.8	20.9
02/01/2013 01:00:00 AM	0.0	<1.0	0.0	0.0	20.3	0.0	0.0	0.0	0.0	20.5	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.4	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	1.9	20.9
02/01/2013 02:00:00 AM	0.0	<1.0	0.0	0.0	20.3	0.0	0.0	0.0	0.0	20.5	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.4	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	1.9	20.9
02/01/2013 03:00:00 AM	0.0	<1.0	0.0	0.0	20.3	0.0	0.0	0.0	0.0	20.5	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.3	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	2.0	20.9
02/01/2013 04:00:00 AM	0.0	<1.0	0.0	0.0	20.3	0.0	0.0	0.0	0.0	20.5	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.2	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	2.0	20.9
02/01/2013 05:00:00 AM	0.0	<1.0	0.0	0.0	20.3	0.0	0.0	0.0	0.0	20.5	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.4	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	1.9	20.9

# RESPEC Consulting & Services

Texas Brine, L.L.C.  
Assumption Parish, Louisiana  
Daily Field Report

Report By: David Gnage

Date: 1-31-13

Company: RESPEC

Work Order #:           ()

Personnel	Company	Job Title

**Time Onsite:** Start Time: NA End Time: NA

**Equipment Onsite:** Hand tools

**Daily Activity:** No Field Work Conducted. RESPEC not on-site.

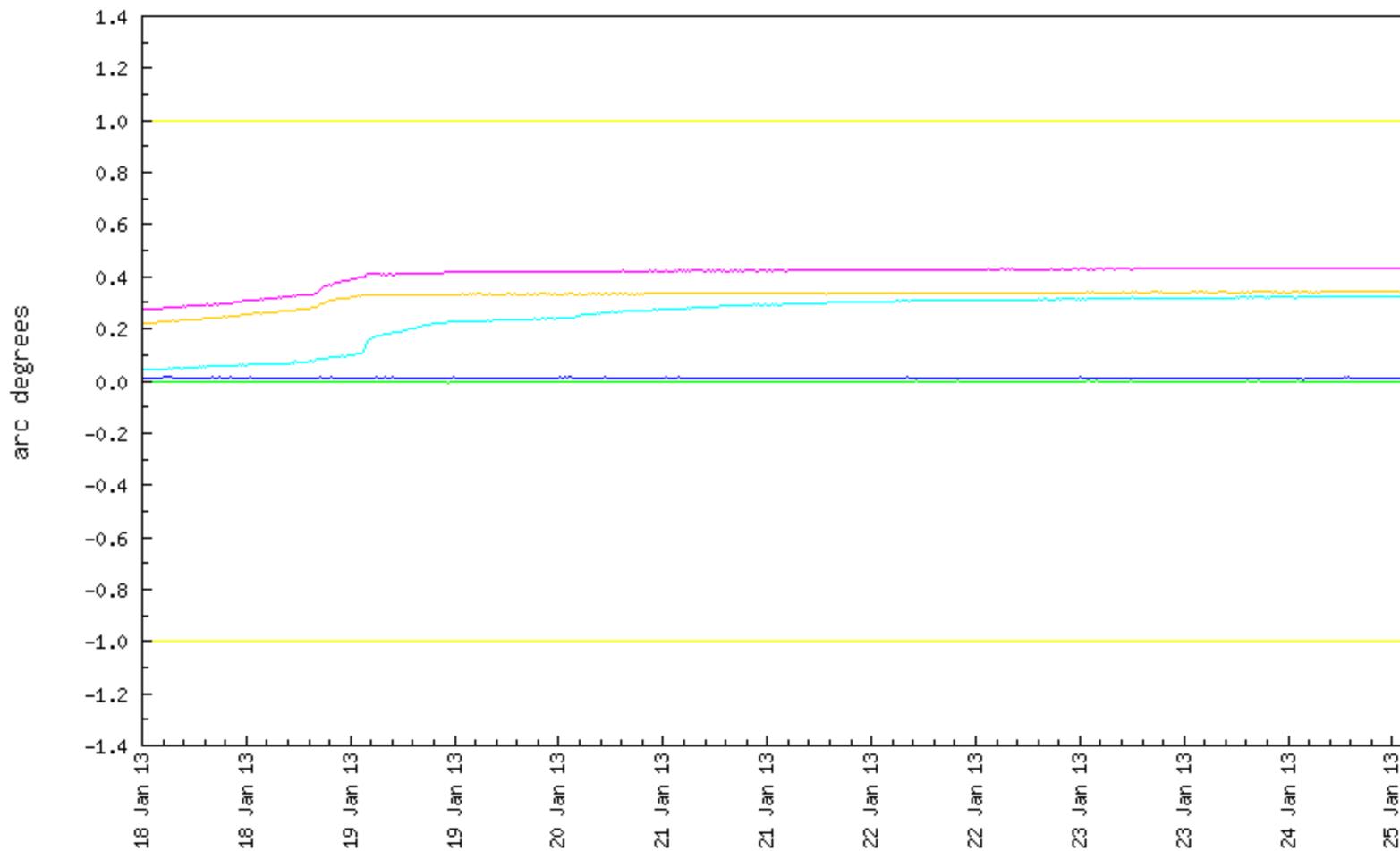
**Proposed Schedule:** Geophone #3 is proposed to spud on Saturday February 2<sup>nd</sup>, RESPEC will mobilize to the site for the installation on February 1<sup>st</sup>. RESPEC will provide drilling oversight for TBC-LA15 & TBC-LA16 when they are installed.

Initials: DJG



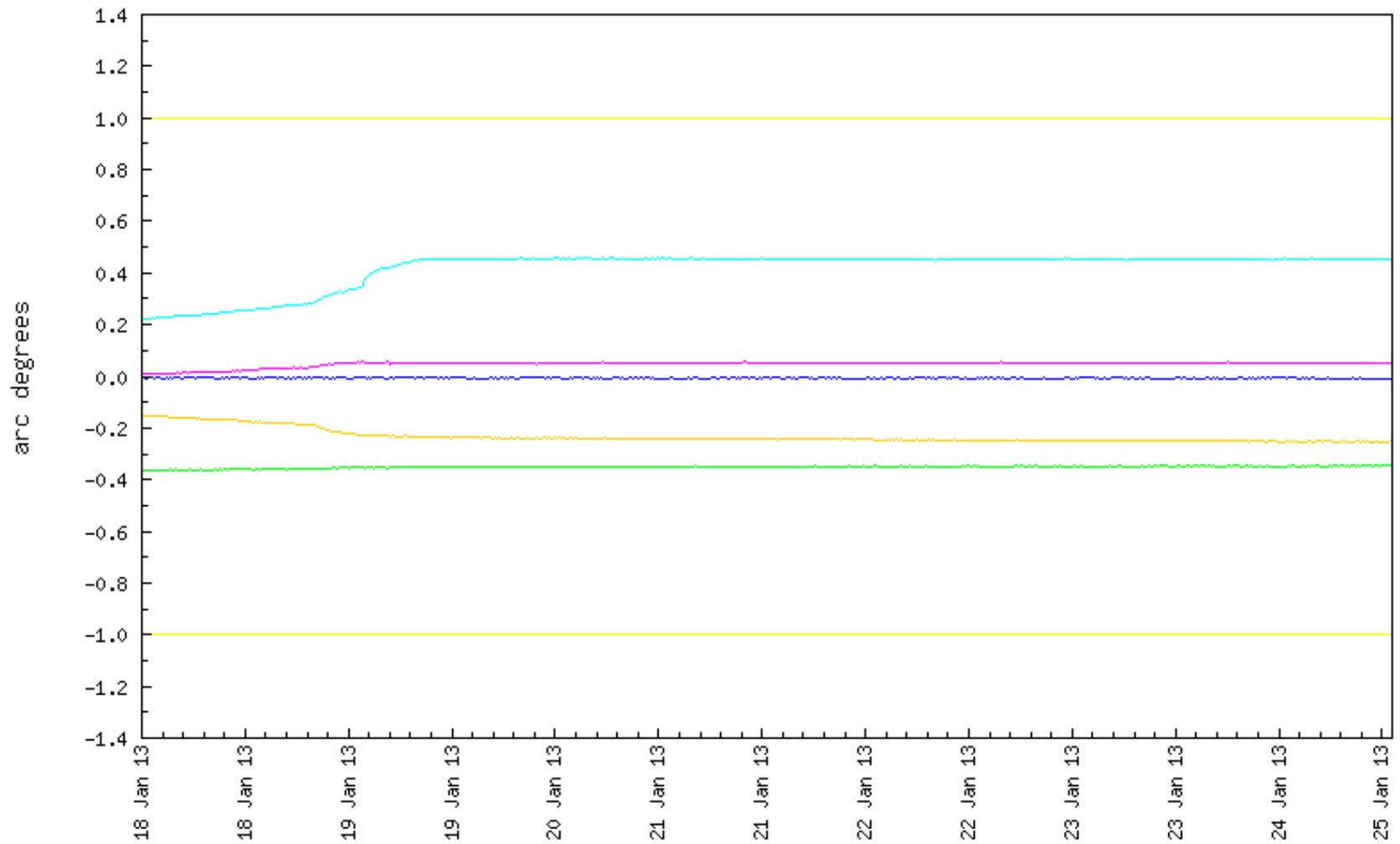
Sinkhole survey data provided by Joel Miller & Associates. Survey date 10/30/12.

# IPI X-Tilt 7-day



— IPI1 X Tilt (deg)    — IPI2 X Tilt (deg)    — IPI3 X Tilt (deg)    — IPI4 X Tilt (deg)    — IPI5 X Tilt (deg)

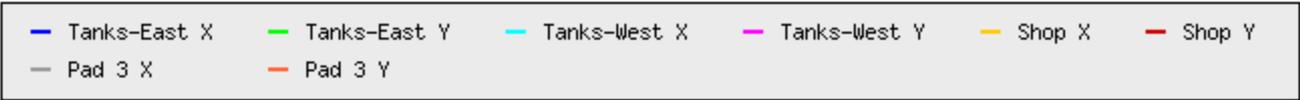
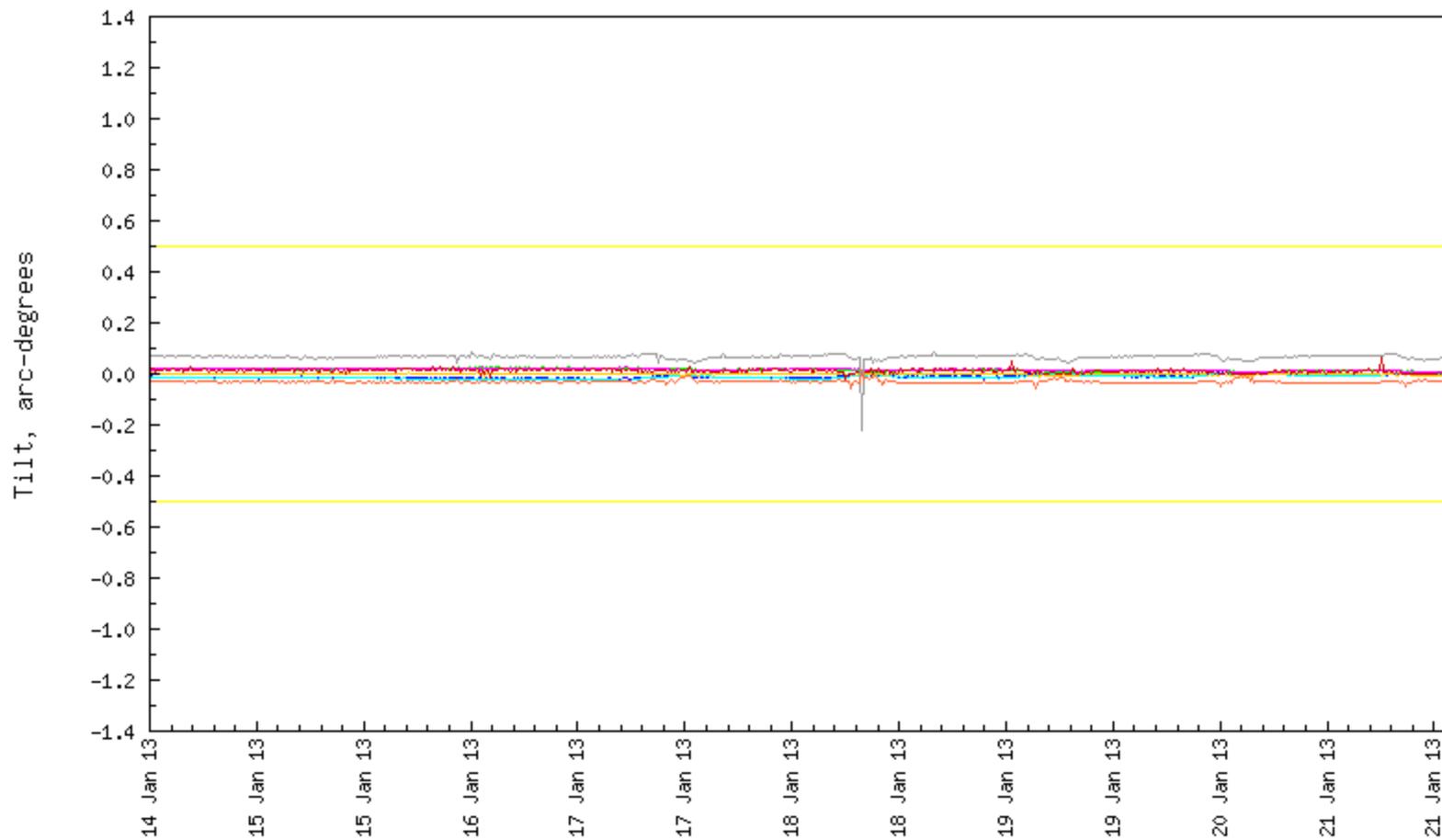
### IPI Y-Axis 7-day



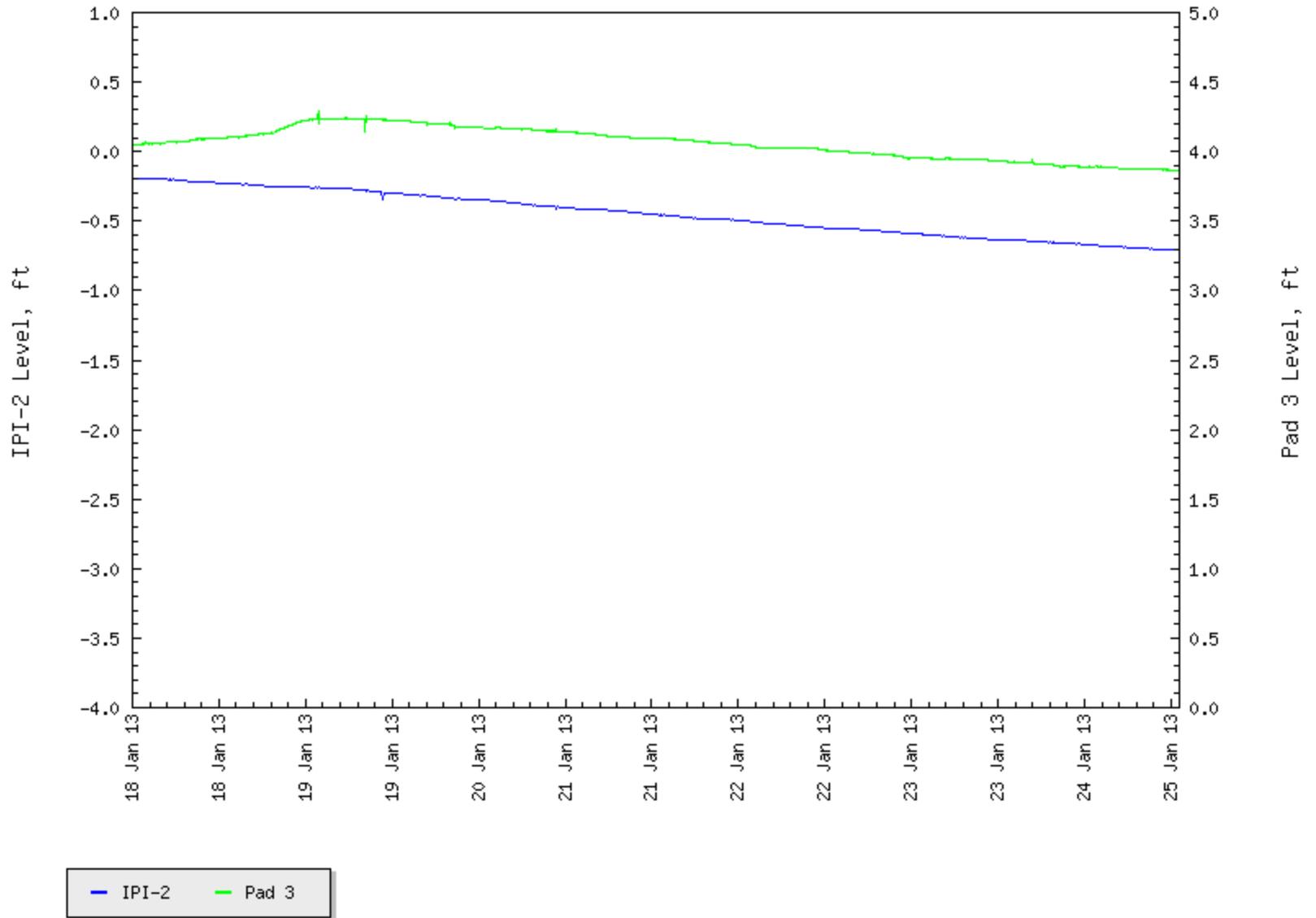
— IPI1 Y Tilt (deg)    — IPI2 Y Tilt (deg)    — IPI3 Y Tilt (deg)    — IPI4 Y Tilt (deg)    — IPI5 Y Tilt (deg)

# Tilt

Tanks, Shop & Oxy-Geismar Pad 3



Water Level at IPI-2 and Pad 3



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

January 31, 2013

### **Subsidence Survey:**

- No Work Done

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

- No Work Done

### **Support Sinkhole Cleanup**

- No Work Done

### **Misc. Survey Work**

- Arrive @ 8:15 am
- Staked both toes of the containment levee along Rig Road & north containment levee alignment. Re-stake soil borings on south & north containment levee road @ 30' offsets.
- Departed 4:00 pm

# Michael Pisani & Associates

## Texas Brine, L.L.C. Assumption Parish, Louisiana Daily Field Report

Report By: Patrick Ritchie  
Company: MP&A

Date: 1/31/2013  
Work Order # 80-05

Health and Safety Meeting  YES  NO

Weather: 50 F overcast, strong S wind

<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>		

Site Activities: Start Time 6:50 End Time 18:00

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

**Daily Activity:**  
Finish grouting well at MRAA-01M location

Estimated time of completion:  
On-going

**Proposed schedule:**  
Conduct in-situ monitoring surface water transect and industrial water well locations 2/1/2013  
Measure water level for the industrial water wells 2/1/2013  
Measure pressure and water level at TBC Geoprobe locations 2/4/2013

Estimated time of completion:  
On-going

Initials: PMR