



Texas Brine Company, LLC

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September 4, 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, 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	Steven Shaughnessy - 07:45 - 08:30 Britt Barnett (Code Red) - 07:00 - 17:00		9/3/2013		NA	NA	NA	AreaRAE Monitors	9/4/2013	
	Residential Air Monitoring	Sage has been requested to suspend bimonthly residential air monitoring. Therefore, Sage will discontinue these activities.		NA		NA	NA	NA	NA	NA	
	Gas Seep Sampling	No work performed		9/3/2013		NA	NA	NA	NA	NA	
	Well Gas Sampling	No work performed		9/3/2013		NA	NA	NA	NA	NA	
	Under Slab Gas Sampling	No work performed		9/3/2013		NA	NA	NA	NA	NA	
	Indoor Air Monitoring	No work performed		9/3/2013		NA	NA	NA	NA	NA	
	Respec	Inclinometers/Tilt Meters/Transducers	9/2 - 9/3/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
InSAR Reflector Installations		9/2 - 9/3/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA	
Subsidence Survey-Fenstermaker		9/2 - 9/3/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA	
Shallow Geophone Installation		9/2 - 9/3/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA	
Deep Geophone Installation		9/2 - 9/3/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA	
Amendment #3, Directive #2		9/2 - 9/3/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA	
Expansion of geoprobe gas sampling locations		9/2 - 9/3/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA	
DPVE Pilot Test		9/2 - 9/3/2013	Continue operation of DPVE-26.; RESPEC mobilize	P. Smith	NA	NA	NA	NA	NA	NA	
MIHPT		9/2 - 9/3/2013	Mobilize	D. Gnage	NA	NA	NA	NA	NA	NA	
Miller		Weekly Stability Survey	No Work Performed		September 3, 2013		NA	NA	NA	NA	NA
		Misc. Survey Work	No Work Performed		September 3, 2013		NA	NA	NA	NA	NA
	Sinkhole Hydro/Perimeter Survey	No Work Performed		September 3, 2013		NA	NA	NA	NA	NA	
Pisani	Surface Water	NA		September 3, 2013		NA	NA	NA	NA	NA	
	Industrial Well Water	PMR		September 3, 2013	9/3/2013	NA	NA	GCAL	Chloride, Bromide and Sulfate (Inorganic Anions) – SW-846 9056A, Conductivity – SM 2510B, TDS – SM 2540C, Cations/metals – SW-846 6010B, Carbonate & Bicarbonate Alkalinity – SM 2320B, BTEX – SW-846 8260B, TPH Fractions – TX 1006/LA 1006, and Dissolved Gases - RSK-175	NA	
	MRAA Well Water	NA		September 3, 2013	NA	NA	NA	NA	NA		
	GP/ORW Water	NA		September 3, 2013	NA	NA	NA	NA	NA		
	Cavern Brine	NA		September 3, 2013	NA	NA	NA	NA	NA		
	Geoprobe Wells	NA		September 3, 2013	NA	NA	NA	NA	NA		
Grand Bayou Well 3A											
Summary of Today's events											
Oxy 3A											
Daily Operations at 3A		7am		9/4/2013							
9/4/2013		673.59				Relief Well #1					
See ORW-01 Flare Spreadsheet											
9/4/2013											

Attachments

Daily Action Summary

September 3, 2013

Stationary Air Monitoring

- Eric Rucinski onsite from 07:45 to 08:30. Changed out the monitors between 08:02 and 08:17. Collected data from the monitoring database and forwarded to Steven Shaughnessy in the Baton Rouge office for processing.
- Britt Barnett 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

- Sage has been requested to suspend bimonthly residential air monitoring. Therefore, Sage will discontinue these activities. The last event was conducted on March 26, 2013.

Gas Seep Sampling

- Not Scheduled

Well Gas Sampling

- Not Scheduled

Under Slab 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 *	Observation Relief Well -7					Observation Relief Well - 8					Observation Relief Well -11					South of OG3A-1					Onsite Trailers				
	ORW-7					ORW-8					ORW-11					Pad #9					TR-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 (%)
09/03/2013 01:00:00 AM	<1.0	<1.0	0.0	0.0	21.4	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
09/03/2013 02:00:00 AM	<1.0	0.0	0.0	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	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
09/03/2013 03:00:00 AM	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
09/03/2013 04:00:00 AM	<1.0	0.0	<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	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
09/03/2013 05:00:00 AM	<1.0	0.0	<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	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
09/03/2013 06:00:00 AM	<1.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	<1.0	0.0	21.0	<1.0	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
09/03/2013 07:00:00 AM	<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	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
09/03/2013 08:00:00 AM	<1.0	0.0	<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	20.7	<1.0	0.0	<1.0	0.0	20.9
09/03/2013 09:00:00 AM	<1.0	0.0	<1.0	0.0	20.7	0.0	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	20.7	2.0	0.0	<1.0	0.0	20.9
09/03/2013 10:00:00 AM	<1.0	0.0	<1.0	0.0	20.8	0.0	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	1.0	<1.0	<1.0	0.0	20.9
09/03/2013 11:00:00 AM	<1.0	0.0	<1.0	0.0	20.9	0.0	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	20.8	0.0	<1.0	0.0	0.0	20.9
09/03/2013 12:00:00 PM	<1.0	0.0	<1.0	0.0	20.9	0.0	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	0.0	<1.0	0.0	0.0	20.9
09/03/2013 01:00:00 PM	<1.0	0.0	<1.0	0.0	20.9	0.0	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	0.0	<1.0	0.0	0.0	20.9
09/03/2013 02:00:00 PM	<1.0	0.0	<1.0	0.0	20.9	0.0	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	0.0	0.0	0.0	0.0	20.9
09/03/2013 03:00:00 PM	<1.0	0.0	<1.0	0.0	20.9	0.0	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	0.0	<1.0	0.0	0.0	20.9
09/03/2013 04:00:00 PM	<1.0	0.0	<1.0	0.0	20.9	0.0	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	0.0	0.0	0.0	0.0	20.9
09/03/2013 05:00:00 PM	<1.0	0.0	<1.0	0.0	20.9	0.0	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	0.0	0.0	0.0	0.0	20.9
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09/03/2013 07:00:00 PM	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	21.2	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9
09/03/2013 08:00:00 PM	<1.0	0.0	0.0	0.0	20.9	<1.0	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
09/03/2013 09:00:00 PM	<1.0	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	0.0	0.0	0.0	0.0	20.9
09/03/2013 10:00:00 PM	<1.0	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	0.0	0.0	0.0	0.0	20.9
09/03/2013 11:00:00 PM	<1.0	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	0.0	0.0	0.0	0.0	20.9
09/04/2013 12:00:00 AM	<1.0	<1.0	<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

Notes:

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 *	Observation Relief Well -7					Observation Relief Well - 8					Observation Relief Well -11					South of OG3A-1					Onsite Trailers				
	ORW-7					ORW-8					ORW-11					Pad #9					TR-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 (%)
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09/03/2013 06:00:00 AM	<1.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	21.0	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
09/03/2013 07:00:00 AM	<1.0	<1.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
09/03/2013 08:00:00 AM	<1.0	0.0	<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	20.7	<1.0	0.0	<1.0	0.0	20.9
09/03/2013 09:00:00 AM	<1.0	0.0	<1.0	0.0	20.7	0.0	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	20.7	2.0	0.0	<1.0	0.0	20.9
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09/04/2013 12:00:00 AM	<1.0	<1.0	<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
09/04/2013 01:00:00 AM	<1.0	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	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
09/04/2013 02:00:00 AM	<1.0	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	0.0	0.0	0.0	0.0	20.9
09/04/2013 03:00:00 AM	<1.0	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	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
09/04/2013 04:00:00 AM	<1.0	<1.0	<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	<1.0	0.0	0.0	20.9
09/04/2013 05:00:00 AM	<1.0	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	0.0	<1.0	0.0	0.0	20.9

Notes:

RESPEC Consulting & Services

Texas Brine, L.L.C.

Assumption Parish, Louisiana

Daily Field Report

Report By: David Gnage

Date: 09/02/13

Company: RESPEC

Job #: 02241

Personnel	Company	Job Title

Time Onsite: Start Time: NA End Time: NA

DAILY ACTIVITY:

No Field Work Conducted. RESPEC not on-site.

DPVE pilot program:

Instrumentation program:

MIHPT program:

PROPOSED SCHEDULE:

DPVE pilot program:

P. Smith to mobilize to site.

Instrumentation program:

No work Scheduled

MIHPT program:

D. Gnage to mobilize to site.

Initials: DJG

RESPEC Consulting & Services

Texas Brine, L.L.C.

Assumption Parish, Louisiana

Daily Field Report

Report By: David Gnage

Date: 09/03/13

Company: RESPEC

Job #: 02241

Personnel	Company	Job Title

Time Onsite: Start Time: NA End Time: NA

DAILY ACTIVITY:

No Field Work Conducted. RESPEC not on-site.

DPVE pilot program:

P. Smith mobilized to site.

Instrumentation program:

MIHPT program:

D. Gnage mobilized to site

PROPOSED SCHEDULE:

DPVE pilot program:

Continue operation and troubleshooting. Mobilize Thermal Oxidizer to site

Instrumentation program:

No work Scheduled

MIHPT program:

.

Initials: DJG

ME&A Daily Action Summary

September 3, 2013

Subsidence Survey:

- No Work Done

Sinkhole Perimeter/Hydrographic Survey:

- No Work Done

Support Sinkhole Cleanup

- No Work Done

Misc. Survey Work

- No Work Done

Michael Pisani & Associates

Texas Brine, L.L.C.

Assumption Parish, Louisiana

Daily Field Report

Report By: Patrick Ritchie

Company: MP&A

Date: 9/3/2013

Work Order # 80-05

Health and Safety Meeting YES NO

Weather: 96 F Clear, humid

<u>Personnel</u>	<u>Company</u>	<u>Job Title</u>
<u>Patrick Ritchie</u>	<u>MP&A</u>	<u>Environmental Scientist</u>
<u>John McGuire</u>	<u>MP&A</u>	<u>Environmental Scientist</u>
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Site Activities: Start Time 8:05 End Time 16:20

Equipment On-site:
Airboat

Daily Activity:
Observe, video, measure bubble sites
Conduct in-situ monitoring of industrial water wells
Measure water level for the industrial water wells and MRAA wells
Collect laboratory samples from the industrial water wells

Estimated time of completion:
On-going

Proposed schedule:
Conduct in-situ monitoring of industrial water wells
Measure water level for the industrial water wells and MRAA wells
Measure pressure and water level at TBC Geoprobe locations
Collect laboratory samples from the industrial water wells
Observe, video, measure bubble sites

Estimated time of completion:
On-going

Initials: PMR