



# Texas Brine Company, LLC

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September 18, 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	Eric Rucinski - 07:50 - 09:00 Britt Barnett (Code Red) - 07:00 - 17:00		9/17/2013		NA	NA	NA	AreaRAE Monitors	9/18/2013
	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		9/17/2013		NA	NA	NA	NA	NA
	Well Gas Sampling	No work performed		9/17/2013		NA	NA	NA	NA	NA
	Under Slab Gas Sampling	No work performed		9/17/2013		NA	NA	NA	NA	NA
	Indoor Air Monitoring	No work performed		9/17/2013		NA	NA	NA	NA	NA
Respec	Inclinometers/Tilt Meters/Transducers	9/17/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	InSAR Reflector Installations	9/17/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	Subsidence Survey-Fenstermaker	9/17/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	Shallow Geophone Installation	9/17/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	Deep Geophone Installation	9/17/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	Amendment #3, Directive #2	9/17/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	Expansion of geoprobe gas sampling locations	9/17/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	DPVE Pilot Test	9/17/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	MIHPT	9/17/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	Miller	Weekly Stability Survey	NA		September 17, 2013		NA	NA	NA	NA
Misc. Survey Work		NA		September 17, 2013		NA	NA	NA	NA	NA
Sinkhole Hydro/Perimeter Survey		NA		September 17, 2013		NA	NA	NA	NA	NA
Surface Water		NA		September 17, 2013		NA	NA	NA	NA	NA
Pisani	Industrial Well Water	NA		September 17, 2013		NA	NA	NA	NA	NA
	MRAA Well Water	NA		September 17, 2013		NA	NA	NA	NA	NA
	GP/ORW Water	NA		September 17, 2013		NA	NA	NA	NA	NA
	Cavern Brine	NA		September 17, 2013		NA	NA	NA	NA	NA
	Geoprobe Wells	NA		September 17, 2013		NA	NA	NA	NA	NA
Grand Bayou Well 3A										
Summary of Today's events										
Oxy 3A										
Daily Operations at 3A										
9/18/2013		7am								
		691.88	9/18/2013							
Relief Well #1										
9/18/2013		See ORW-01 Flare Spreadsheet								

## **Attachments**

## **Daily Action Summary**

**September 17, 2013**

### **Stationary Air Monitoring**

- Eric Rucinski onsite from 07:50 to 09:00. Changed out the monitors between 08:09 and 08:46. 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-7a					ORW-8a					ORW-11a					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 (%)
09/17/2013 01:00:00 AM	0.0	0.0	0.0	0.0	20.9	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	<1.0	0.0	0.0	20.9
09/17/2013 02:00:00 AM	0.0	0.0	0.0	0.0	20.9	<1.0	<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	20.9
09/17/2013 03:00:00 AM	0.0	0.0	0.0	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	<1.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9
09/17/2013 04:00:00 AM	0.0	0.0	<1.0	0.0	20.9	0.0	<1.0	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	<1.0	0.0	0.0	20.9
09/17/2013 05:00:00 AM	0.0	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	0.0	<1.0	0.0	0.0	20.9
09/17/2013 06:00:00 AM	0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	<1.0	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
09/17/2013 07:00:00 AM	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	<1.0	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
09/17/2013 08:00:00 AM	0.0	0.0	<1.0	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	<1.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.9
09/17/2013 09:00:00 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	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
09/17/2013 10:00:00 AM	0.0	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	<1.0	0.0	20.9
09/17/2013 11:00:00 AM	0.0	0.0	<1.0	0.0	21.2	<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	<1.0	0.0	20.9
09/17/2013 12:00:00 PM	0.0	0.0	<1.0	0.0	21.3	<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	0.0	0.0	<1.0	0.0	20.9
09/17/2013 01:00:00 PM	0.0	0.0	<1.0	0.0	21.4	<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	<1.0	0.0	20.9
09/17/2013 02:00:00 PM	0.0	0.0	0.0	0.0	21.3	<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	21.2	0.0	0.0	<1.0	0.0	20.9
09/17/2013 03:00:00 PM	0.0	0.0	0.0	0.0	21.3	<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	21.2	0.0	0.0	<1.0	0.0	20.9
09/17/2013 04:00:00 PM	0.0	0.0	0.0	0.0	21.4	<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	21.2	0.0	0.0	<1.0	0.0	20.9
09/17/2013 05:00:00 PM	0.0	0.0	0.0	0.0	21.3	<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	21.2	<1.0	0.0	<1.0	0.0	20.9
09/17/2013 06:00:00 PM	0.0	0.0	0.0	0.0	21.3	<1.0	0.0	<1.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	21.2	0.0	0.0	<1.0	0.0	20.9
09/17/2013 07:00:00 PM	0.0	0.0	0.0	0.0	21.2	<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	21.2	0.0	0.0	<1.0	0.0	20.9
09/17/2013 08:00:00 PM	0.0	0.0	0.0	0.0	21.2	<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	21.1	0.0	0.0	<1.0	0.0	20.9
09/17/2013 09:00:00 PM	0.0	0.0	0.0	0.0	21.1	<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	21.1	0.0	0.0	<1.0	0.0	20.9
09/17/2013 10:00:00 PM	0.0	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	<1.0	0.0	20.9
09/17/2013 11:00:00 PM	0.0	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	<1.0	0.0	20.9
09/18/2013 12:00:00 AM	0.0	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	<1.0	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-7a					ORW-8a					ORW-11a					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 (%)
09/17/2013 05:00:00 AM	0.0	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	0.0	<1.0	0.0	0.0	20.9
09/17/2013 06:00:00 AM	0.0	0.0	<1.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	<1.0	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
09/17/2013 07:00:00 AM	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	<1.0	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
09/17/2013 08:00:00 AM	0.0	0.0	<1.0	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	<1.0	0.0	20.9	0.0	<1.0	<1.0	0.0	20.9
09/17/2013 09:00:00 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	<1.0	0.0	20.9
09/17/2013 10:00:00 AM	0.0	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	<1.0	0.0	20.9
09/17/2013 11:00:00 AM	0.0	0.0	<1.0	0.0	21.2	<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	<1.0	0.0	20.9
09/17/2013 12:00:00 PM	0.0	0.0	<1.0	0.0	21.3	<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	0.0	0.0	<1.0	0.0	20.9
09/17/2013 01:00:00 PM	0.0	0.0	<1.0	0.0	21.4	<1.0	0.0	<1.0	0.0	20.9	0.0	<1.0	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
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09/17/2013 03:00:00 PM	0.0	0.0	0.0	0.0	21.3	<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	21.2	0.0	0.0	<1.0	0.0	20.9
09/17/2013 04:00:00 PM	0.0	0.0	0.0	0.0	21.4	<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	21.2	0.0	0.0	<1.0	0.0	20.9
09/17/2013 05:00:00 PM	0.0	0.0	0.0	0.0	21.3	<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	21.2	<1.0	0.0	<1.0	0.0	20.9
09/17/2013 06:00:00 PM	0.0	0.0	0.0	0.0	21.3	<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	21.2	0.0	0.0	<1.0	0.0	20.9
09/17/2013 07:00:00 PM	0.0	0.0	0.0	0.0	21.2	<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	21.2	0.0	0.0	<1.0	0.0	20.9
09/17/2013 08:00:00 PM	0.0	0.0	0.0	0.0	21.2	<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	21.1	0.0	0.0	<1.0	0.0	20.9
09/17/2013 09:00:00 PM	0.0	0.0	0.0	0.0	21.1	<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	21.1	0.0	0.0	<1.0	0.0	20.9
09/17/2013 10:00:00 PM	0.0	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	<1.0	0.0	20.9
09/17/2013 11:00:00 PM	0.0	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	<1.0	0.0	20.9
09/18/2013 12:00:00 AM	0.0	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	<1.0	0.0	20.9
09/18/2013 01:00:00 AM	0.0	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	<1.0	0.0	20.9
09/18/2013 02:00:00 AM	0.0	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	<1.0	0.0	20.9
09/18/2013 03:00:00 AM	0.0	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	21.0	0.0	0.0	<1.0	0.0	20.9
09/18/2013 04:00:00 AM	0.0	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	<1.0	<1.0	0.0	20.9
09/18/2013 05:00:00 AM	0.0	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	<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: 09/17/13

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:**

**MIHPT program:**

**Instrumentation program:**

**PROPOSED SCHEDULE:**

**DPVE pilot program:**

P. Smith to mobilize to site for Sept. 18th.

**Instrumentation program:**

No work Scheduled

**MIHPT program:**

P. Smith to mobilize to site for Sept. 18th. Drilling resumes Sept. 18<sup>th</sup>.

Initials: DJG