



Texas Brine Company, LLC

1301 Highway 70
Belle Rose, LA 70341
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October 9, 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 - 08:20 - 09:10 Mark Schlecht (Code Red) - 07:00 - 17:00		10/8/2013		NA	NA	NA	NA	10/9/2013
	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		10/8/2013		NA	NA	NA	NA	NA
	Well Gas Sampling	Steve Shaughnessy - 07:02		10/8/2013		Yes	No	Isotech	Isotopic	upon receipt of results from labs
	Under Slab Gas Sampling	No work performed		10/8/2013		NA	NA	NA	NA	NA
	Indoor Air Monitoring	No work performed		10/8/2013		NA	NA	NA	NA	NA
Respec	Inclinometers/Tilt Meters/Transducers	10/8/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	InSAR Reflector Installations	10/8/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	Subsidence Survey-Fenstermaker	10/8/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	Shallow Geophone Installation	10/8/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	Deep Geophone Installation	10/8/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	Amendment #3, Directive #2	10/8/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	Expansion of geoprobe gas sampling locations	10/8/2013	No work Conducted	NA	NA	NA	NA	NA	NA	NA
	DPVE Pilot Test	10/8/2013	Oversee DPVE-47 pilot test	P. Smith	NA	NA	NA	NA	NA	NA
	MIHPT	10/8/2013	oversee installation of MIHPT-31 and first attempt at MIHPT-202	D. Gnage	NA	NA	NA	NA	NA	NA
	Miller	Weekly Stability Survey	No Work Performed		10/7 - 10/8/2013		NA	NA	NA	NA
Misc. Survey Work		Matt Fore		October 8, 2013		NA	NA	NA	NA	NA
Sinkhole Hydro/Perimeter Survey		No Work Performed		10/7 - 10/8/2013		NA	NA	NA	NA	NA
Pisani	Surface Water	NA		October 8, 2013		NA	NA	NA	NA	NA
	Sinkhole	NA		October 8, 2013		NA	NA	NA	NA	NA
	Industrial Well Water	NA		October 8, 2013		NA	NA	NA	NA	NA
	MRAA Well Water	NA		October 8, 2013		NA	NA	NA	NA	NA
	GP/ORW Water	NA		October 8, 2013		NA	NA	NA	NA	NA
	Cavern Water	NA		October 8, 2013		NA	NA	NA	NA	NA
	Discharge/Outfall Water	NA		October 8, 2013		NA	NA	NA	NA	NA
	Geoprobe Wells	NA		October 8, 2013		NA	NA	NA	NA	NA
Grand Bayou Well 3A										
Daily Operations at 3A		Summary of Today's events								
		Oxy 3A								
10/9/2013		7am	736.88	10/9/2013						
10/9/2013		Relief Well #1								
		See ORW-01 Flare Spreadsheet								

Attachments

Daily Action Summary

October 8, 2013

Stationary Air Monitoring

- Steven Shaughnessy onsite from 08:20 to 09:10. Changed out the monitors between 08:28 and 08:45. Collected data from the monitoring database and forwarded to Eric Rucinski in the Baton Rouge office for processing.
- Mark Schlecht of Code Red (monitor sub-contractor) onsite from 07:00 to 17:00. Assisted in battery change outs and maintenance of the monitoring equipment.

NOTE: Beginning at approximately 21:22 on 10/08/2013, data was not properly transmitted due to a receiver malfunction. The receiver malfunction was resolved at approximately 07:45 on 10/09/2013, and normal data collection resumed. Additionally, RTU-9, located at ORW-11a, recorded elevated CO readings while deployed on 10/08/2013. The maximum instantaneous reading recorded was 14.9 ppm. Heavy equipment was operated near ORW-11a on 10/08/2013.

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

- Well gas samples were collected from Geophone-1. Steven Shaughnessy started the scheduled well gas sampling at 07:02. Two samples were collected and were shipped to Isotech Laboratories in Illinois for isotopic analysis.

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 (%)
10/08/2013 01:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/08/2013 02:00:00 AM	0.0	<1.0	<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	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/08/2013 03:00:00 AM	0.0	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	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/08/2013 04:00:00 AM	0.0	<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	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/08/2013 05:00:00 AM	0.0	<1.0	<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	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/08/2013 06:00:00 AM	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/08/2013 07:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.8	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/08/2013 08:00:00 AM	<1.0	<1.0	<1.0	0.0	20.9	<1.0	<1.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.7	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/08/2013 09:00:00 AM	0.0	0.0	0.0	0.0	20.7	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.8	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/08/2013 10:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	<1.0	<1.0	0.0	20.0	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/08/2013 11:00:00 AM	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	20.2	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/08/2013 12:00:00 PM	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	20.4	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
10/08/2013 01:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	1.9	0.0	<1.0	0.0	20.7	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
10/08/2013 02:00:00 PM	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	7.1	0.0	<1.0	0.0	20.8	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
10/08/2013 03:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	7.7	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
10/08/2013 04:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	8.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
10/08/2013 05:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	9.5	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
10/08/2013 06:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	9.7	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
10/08/2013 07:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	10.8	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
10/08/2013 08:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	11.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
10/08/2013 09:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	11.4	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
10/08/2013 10:00:00 PM	Data not properly transmitted					Data not properly transmitted					Data not properly transmitted					Data not properly transmitted					Data not properly transmitted				
10/08/2013 11:00:00 PM	Data not properly transmitted					Data not properly transmitted					Data not properly transmitted					Data not properly transmitted					Data not properly transmitted				
10/09/2013 12:00:00 AM	Data not properly transmitted					Data not properly transmitted					Data not properly transmitted					Data not properly transmitted					Data not properly transmitted				

Notes:

Beginning at approximately 09:22 PM on 10/08/2013, data was not properly transmitted due to a receiver malfunction. The receiver malfunction was resolved at approximately 07:45 AM on 10/09/2013, and normal data collection resumes. RTU-9, located at ORW-11a, recorded elevated CO readings while deployed on 10/08/2013. The maximum instantaneous reading recorded was 14.9 ppm. Heavy equipment was operated near ORW-11a on 10/08/2013.

Texas Brine - Belle Rose, Louisiana
Hourly Air Monitoring Data

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10/08/2013 06:00:00 AM	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/08/2013 07:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	0.0	0.0	0.0	20.8	<1.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/08/2013 08:00:00 AM	<1.0	<1.0	<1.0	0.0	20.9	<1.0	<1.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.7	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
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10/08/2013 10:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	<1.0	<1.0	<1.0	0.0	20.0	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/08/2013 11:00:00 AM	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	20.2	<1.0	0.0	<1.0	0.0	20.9	0.0	0.0	<1.0	0.0	20.9
10/08/2013 12:00:00 PM	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	20.4	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
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10/08/2013 04:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	8.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
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10/08/2013 06:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	9.7	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
10/08/2013 07:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	10.8	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
10/08/2013 08:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	11.0	0.0	0.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9	<1.0	0.0	<1.0	0.0	20.9
10/08/2013 09:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	11.4	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
10/08/2013 10:00:00 PM	Data not properly transmitted					Data not properly transmitted					Data not properly transmitted					Data not properly transmitted					Data not properly transmitted				
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Notes:
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RESPEC Consulting & Services

Texas Brine, L.L.C.

Assumption Parish, Louisiana

Daily Field Report

Report By: David Gnage

Date: 10/08/13

Company: RESPEC

Job #: 02241

Personnel	Company	Job Title
David J. Gnage	RESPEC	Staff Geologist
Peter H. Smith, CPG	RESPEC	Staff Geologist

Time Onsite: Start Time: 7:15 End Time: 17:50

DAILY ACTIVITY:

Attended Daily Contractor meeting.

DPVE pilot program:

System was started late on the 7th, ran overnight until 15:30 when it was shutdown to bring the Catox online. The system with the Catox was restarted at 16:30 and continues to run.

MiHPT Boring Program:

Installed MiHPT-31 near ORW8/CPT31. Attempted to install MiHPT-202 near ORW5/CPT2, but at approximately 58 feet the rods became angled (approx. 15%) making advancement of the hole unwise. The depth measurements from that point on would be off and there is the potential to break the rods or not be able to remove them. This hole was terminated and will be re-attempted on 10/9/13.

Instrumentation Program:

No activity. No personnel on-site

PROPOSED SCHEDULE:

DPVE pilot program:

Continue run DPVE system at DPVE-47

MiHPT Boring Program:

Re-attempt MiHPT-202 at ORW5/CPT2 and install MiHPT-19 near CPT19.

Instrumentation Program:

No work currently scheduled.

Initials: DJG

ME&A Daily Action Summary

October 7, 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

ME&A Daily Action Summary

October 8, 2013

Subsidence Survey:

- No Work Done

Sinkhole Perimeter/Hydrographic Survey:

- No Work Done

Support Sinkhole Cleanup

- No Work Done

Misc. Survey Work

- Arrive @ 9:30 am
- Monitor OG Pad 3 for subsidence while Water Well #3 is P&A'd.
- Depart @ 4:00 pm