

# Texas Brine Company, LLC 1301 Highway 70 Belle Rose, LA 70341

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Phone: 985-369-6657 Fax: 985-369-7873

October 25, 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 <u>conservationorder@la.gov</u>, ref. "Emergency Declaration-Texas Brine Company LLC-9/25/2012.

Bruce E. Martin

Vice President, Operations

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Texas Brine Company, LLC



			TBC Oxy Gran	d Bayou Data Manage	ment-Enviro	onmental					
Contractor	Responsibilities	Coll	ected By	Date Collect			Results from Lab	Laboratory	Method	Date to Ag	zencies
Sage	Stationary Air Monitoring	Steven Shaughr	nessy - 08:35 - 09:35 e Red) - 07:00 - 17:00	10/24/201		NA	NA	NA	NA	10/25/2	
	Residential Air Monitoring	bimonthly reside Therefore, Sage v	equested to suspend ential air monitoring. vill discontinue these civities.	NA		NA	NA	NA	NA	NA	
_	Gas Seep Sampling	No work	performed	10/24/201	3	NA	NA	NA	NA	NA	
_	Well Gas Sampling	No work	c performed	10/24/201	3	NA	NA	NA	NA	NA	
	Under Slab Gas Sampling	No work	performed	10/24/201	3	NA	NA	NA	NA	NA	
	Indoor Air Monitoring	No work	performed	10/24/201	3	NA	NA	NA	NA	NA	
Respec	Inclinometers/Tilt Meters/Transducers	10/24/2013	NA	NA	NA	NA	NA		NA	NA	NA
-	InSAR Reflector Installations	10/24/2013	NA	NA	NA	NA	NA		NA	NA	NA
	Subsidence Survey-Fenstermaker	10/24/2013	NA	NA	NA	NA	NA		NA	NA	NA
_	Shallow Geophone Installation	10/24/2013	NA	NA	NA	NA	NA		NA	NA	NA
_	Deep Geophone Installation	10/24/2013	NA	NA	NA	NA	NA		NA	NA	NA
_	Amendment #3, Directive #2	10/24/2013	NA	NA	NA	NA	NA		NA	NA	NA
_	Expansion of geoprobe gas sampling locations	10/24/2013	NA	NA	NA	NA	NA		NA	NA	NA
-	DPVE Pilot Test MIHPT	10/24/2013	NA NA	NA NA	NA NA	NA NA	NA NA		NA NA	NA NA	NA NA
Miller	Weekly Stability Survey		n Pichoff	10/23 - 10/24/		NA NA	NA NA	NA	NA NA	NA NA	
-	Misc. Survey Work		ice/Kevin Pichoff	10/23 - 10/24/		NA NA	NA NA	NA NA	NA NA	NA NA	
-	Sinkhole Hydro/Perimeter Survey		k Performed	10/23 - 10/24/		NA	NA	NA	NA	NA.	
Pisani	Surface Water		NA	October 24, 2		NA	NA	NA	NA	NA.	
	Sinkhole		NA	October 24, 2		NA	NA	NA	NA	NA	
	Industrial Well Water		NA	October 24, 2	013	NA	NA	NA	NA	NA	
	MRAA Well Water		NA	October 24, 2	013	NA	NA	NA	NA	NA	
	GP/ORW Water		NA	October 24, 2		NA	NA	NA	NA	NA	
	Cavern Water		NA	October 24, 2		NA	NA	NA	NA	NA	
	Discharge/Outfall Water		NA	October 24, 2		NA	NA	NA	NA	NA	
	Geoprobe Wells		NA	October 24, 2	013	NA	NA	NA	NA	NA	
				Grand Bayou Well	3A						
	Daily Operations at 3A					Summary of	Today's events				
						Ox	y 3A				
	10/25/2013	7am 0.23		10/25/201	3				-		
						Relief	Well #1				
	10/25/2013					See ORW-01 F	lare Spreadsheet				



#### **Daily Action Summary**

#### October 24, 2013

#### **Stationary Air Monitoring**

- Steven Shaughnessy onsite from 08:35 to 09:35. Changed out the monitors between 08:36 and 09:22. Collected data from the monitoring database and forwarded to Jill Martin 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

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

		Observation	n Relief	Well -7		Observation Relief Well - 8						Observ	ation Relief	Well -11			South	<b>1</b> -1		Onsite Trailers					
	ORW-7a					ORW-8a							ORW-11a				]			TR-1					
		Non-					Non-					Non-					Non-					Non-			
		Methane					Methane					Methane					Methane					Methane		1 '	
Date-Time *	CO (ppm)	VOC (ppm) H2	S (ppm)	LEL (%)	O2 (%)	CO (ppm)	VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	CO (ppm)	VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	SO2 (ppm)	VOC (ppm) H2	2S (ppm)	LEL (%)	O2 (%)	CO (ppm)	VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)
10/24/2013 01:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	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
10/24/2013 02:00:00 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	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
10/24/2013 03:00:00 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	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
10/24/2013 04:00:00 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	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
10/24/2013 05:00:00 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	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	21.0
10/24/2013 06:00:00 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	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	21.0
10/24/2013 07:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.8	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/24/2013 08:00:00 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	20.7	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9
10/24/2013 09:00:00 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	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
10/24/2013 10:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	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
10/24/2013 11:00:00 AM	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	21.3	0.0	0.0	0.0	0.0	20.9	<1.0	<1.0	0.0	0.0	20.9
10/24/2013 12:00:00 PM	0.0	0.0	0.0	0.0	21.0	0.0	0.0	0.0	0.0	21.5	0.0	0.0	0.0	0.0	21.4	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/24/2013 01:00:00 PM	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	21.6	0.0	0.0	0.0	0.0	21.4	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/24/2013 02:00:00 PM	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	21.5	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/24/2013 03:00:00 PM	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	21.5	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/24/2013 04:00:00 PM	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	21.4	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/24/2013 05:00:00 PM	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	21.4	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/24/2013 06:00:00 PM	0.0	0.0	0.0	0.0	21.2	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	21.2	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/24/2013 07:00:00 PM	0.0	0.0	0.0	0.0	21.1	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	0.0	0.0	0.0	0.0	20.9
10/24/2013 08:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	21.0	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9
10/24/2013 09:00:00 PM	0.0	0.0	0.0	0.0	21.1	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
10/24/2013 10:00:00 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	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
10/24/2013 11:00:00 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	20.9	0.0	0.0	0.0	0.0	20.9
10/25/2013 12:00:00 AM	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	20.9	0.0	0.0	0.0	0.0	20.9

Notes:

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

		Observ	ation Relief V	Well -7		Observation Relief Well - 8						Observat	Vell -11			Sc	outh of OG3A	-1		Onsite Trailers						
			ORW-7a					ORW-8a			ORW-11a							Pad #9			TR-1					
		Non-					Non-					Non-					Non-					Non-				
		Methane					Methane					Methane					Methane					Methane				
Date-Time *	CO (ppm)	VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	CO (ppm)	VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	CO (ppm)	VOC (ppm) I	H2S (ppm)	LEL (%)	O2 (%)	SO2 (ppm)	VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	CO (ppm)	VOC (ppm)	H2S (ppm)	LEL (%)	O2 (%)	
10/24/2013 05:00:00 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	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	21.0	
10/24/2013 06:00:00 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	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	21.0	
10/24/2013 07:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.8	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	
10/24/2013 08:00:00 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	20.7	0.0	0.0	0.0	0.0	20.9	0.0	<1.0	0.0	0.0	20.9	
10/24/2013 09:00:00 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	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	
10/24/2013 10:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	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	
10/24/2013 11:00:00 AM	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	21.3	0.0	0.0	0.0	0.0	20.9	<1.0	<1.0	0.0	0.0	20.9	
10/24/2013 12:00:00 PM	0.0	0.0	0.0	0.0	21.0	0.0	0.0	0.0	0.0	21.5	0.0	0.0	0.0	0.0	21.4	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	
10/24/2013 01:00:00 PM	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	21.6	0.0	0.0	0.0	0.0	21.4	0.0	0.0	<1.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	
10/24/2013 02:00:00 PM	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	21.5	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	
10/24/2013 03:00:00 PM	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	21.5	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	
10/24/2013 04:00:00 PM	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	21.4	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	
10/24/2013 05:00:00 PM	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	21.4	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	
10/24/2013 06:00:00 PM	0.0	0.0	0.0	0.0	21.2	0.0	0.0	0.0	0.0	21.3	0.0	0.0	0.0	0.0	21.2	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	
10/24/2013 07:00:00 PM	0.0	0.0	0.0	0.0	21.1	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	0.0	0.0	0.0	0.0	20.9	
10/24/2013 08:00:00 PM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	21.0	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	
10/24/2013 09:00:00 PM	0.0	0.0	0.0	0.0	21.1	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	
10/24/2013 10:00:00 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	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	
10/24/2013 11:00:00 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	20.9	0.0	0.0	0.0	0.0	20.9	
10/25/2013 12:00:00 AM	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	20.9	0.0	0.0	0.0	0.0	20.9	
10/25/2013 01:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	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	
10/25/2013 02:00:00 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	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	
10/25/2013 03:00:00 AM	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	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	
10/25/2013 04:00:00 AM	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	0.0	0.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	
10/25/2013 05:00:00 AM	0.0	<1.0	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	0.0	<1.0	0.0	0.0	20.9	0.0	0.0	0.0	0.0	20.9	

Notes:

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

October 23, 2013

#### **Subsidence Survey:**

- Arrived @ 8:00 am
- Ran conventional level loop starting at TBM 2 which is a nail set in a power pole adjacent to the main roadway and OxyGeismar #2 well pad. Ran level loop through brine wells (1, 2 & 3), water wells (1 & 2), TBM's, wells on Pad 3 and the two brine storage tanks

#### Sinkhole Perimeter/Hydrographic Survey:

No Work Done

#### **Support Sinkhole Cleanup**

No Work Done

#### Misc. Survey Work

- Containment berm settlement plate survey, north access roads settlement survey, DPVE-47 settlement plate survey, check water levels.
- Depart @ 12:30 pm

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

October 24, 2013

## **Subsidence Survey:**

No Work Done

## Sinkhole Perimeter/Hydrographic Survey:

No Work Done

#### **Support Sinkhole Cleanup**

No Work Done

#### Misc. Survey Work

- Arrived @ 8:00 am
- Settlement plate survey for DPVE-47
- Departed @ 9:30 am