U.S. ENVIRONMENTAL PROTECTION AGENCY POLLUTION/SITUATION REPORT

Moon-Hines Flowline Spill - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region IV

Subject: POLREP #8

Response Actions Continue Moon-Hines Flowline Spill

Eucutta, MS

Latitude: 31.7561130 Longitude: -88.8549990

To: Ernie Shirley, MSDEQ

From: Leo Francendese, OSC

Date: 1/16/2014 **Reporting Period:** 1/16/2014

1. Introduction

1.1 Background

Site Number: Contract Number:
D.O. Number: Action Memo Date:

Response Authority: OPA Response Type: Emergency
Response Lead: PRP Incident Category: Removal Action

NPL Status: Operable Unit:

Mobilization Date: 1/8/2014 Start Date: 1/8/2014

Demob Date: Completion Date:

CERCLIS ID: RCRIS ID:

ERNS No.: State Notification:

FPN#: E14421 Reimbursable Account #:

1.1.1 Incident Category

Emergency Response

1.1.2 Site Description

The site is a tank battery, flowline and impacted unnamed tributaries and wetland. The operator is Moon-Hines-Tigrett located in Ridgeland, MS. The tank battery consists of 5 above ground storage (AST) tanks and associated pumps and piping.

1.1.2.1 Location

The site is located at Latitude 88 deg 51 min 18 sec North and Longitude 31 deg 45 min 22 sec West in Wayne County, MS. The site is located in a rural area within several adjacent residential properties. It is surrounded on all sides by heavily wooded areas with small creeks, tributaries and wetland located down gradient of the site.

1.1.2.2 Description of Threat

Small creeks, tributaries and wetland are located downgradient of the tank battery and flow generally West and Northwest away from the site. A discharge of oil has occurred to waters of the United States requiring immediate response actions. The oil discharged to an unnamed creek which is a tributary of Wagon Branch, which leads to Tampa Creek then to Little Eucatta Creek then to Eucatta Creek which is a tributary of the Chickasawhay River.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Break occurred along a flowline located about 100 feet downgradient of the tank battery. Approximately 50 barrels of oil were discharged into approximately 2000 feet of small tributaries and wetlands. The spill source has been stopped and downgradient migration is currently being contained.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

1/08/2014 thru 1/09/2014

RP representative are on site, initial resources activated and additional resources were added after initial response. RP contractors are on site collecting recoverable oil and conducting cleanup within the affected

wetlands. Approximately 78 response personnel are on scene. Heavy equipment, including vac trucks, dozer and trackhoe have been activated to assist with recovery operations.

The discharge is currently contained downgradient and stopped at its source.

OSC has requested additional DEQ support under a PRFA. This support will cover SCAT needs, as well as identifying resources at risk and operational/enforcement assistance as needed. OSC has also requested USCG GST logistics and operational support.

1/10/2014

RP representative has increased field personnel to approximately 118 people. Personnel have been broken into teams and each team assigned a designated work area (zone). For Zone reference see Work Zones (Fig. 1) in the documents section of this webpage.

Recovery Operations

Zone A:

Tactic - Removal of recoverable oil using snares and absorbent pads Personnel - 20 workers Equipment used - 2 vacuum truck

Night Operations 1 vacuum truck and crew

Zone B:

Tactic - Removal of underbrush and debris

Continued clearing and development of access road to impacted tributary and wetland
Removal of recoverable oil using snares and absorbent pads,
Personnel - 38 workers
Equipment used - 1 vacuum truck

Night Operations 1 vacuum truck and crew

Zone C:

Tactic - Removal of oil using snares and absorbent pads Placed absorbent boom along creek Personnel - 23 workers Equipment used - NA

Zone D:

Tactic - Removal of oil using snares and absorbent pads Preparation for rain event Personnel - 12 workers Equipment used - NA

Zone E:

Tactic - Recon of area northwest (downgradient) of the current containment Removal of oil using snares and absorbent pads Personnel - 15 workers Equipment used - NA

Waste Management

A frac tank has been added by the RP representative for collection of all recovered material.

All material removed from the impacted wetlands area are being staged in a central location for future disposal.

A waste management plan is being developed.

Health and Safety

Air monitoring to assure worker safety was conducted in all work areas with no elevated readings observed for CO, VOC's, H2S, LEL and Oxygen. Air monitoring will continue twice daily while operations are ongoing.

No reported accidents on site to date.

1/11/2014

During the early morning hours a 1" inch rain event occurred on site over a period of several hours. Early morning recon validated that containment held. Water levels rose significantly as a result of this rain event. Minimum of 1' and maximum of 3' rises were seen on site.

Field personnel onsite is approximately 107 people. Personnel have been broken into teams and each team assigned a designated work area (zone). For Zone reference see Work Zones (Fig. 1) in the documents section of this webpage.

RP added support in the form of 2 engineering consultants. These consultants are to liaison with the client"s insurance company in addition to providing technical advice to the client.

RP continues to address and resolve any outstanding access issues.

Recovery Operations

Zone A:

Tactic - Removal of recoverable oil using snares and absorbent has been tentatively completed for this area.

RP contractor began exploratory trench holes to define the extent of subsurface oil contamination surrounding the break in the flowline. Significant oil is leaching from this area.

Personnel - NA

Equipment used - Backhoe

Estimated % Complete - 75% complete for the removal of recoverable oil in Zone A.

Estimate does not include flowline blowout area excavation.

Night Operations 1 vacuum truck and crew

Zone B:

Tactic - Developed trails to access oil
Removed oily leaves and vegetation
Removal of recoverable oil using snares and absorbent pads,
Personnel - Three teams with 49 workers
Equipment used - 2 vacuum trucks
Estimated % Complete - 10

Night Operations 1 vacuum truck and crew

Zone C:

Tactic - Removal of oil using snares, absorbent pads and absorbent boom Personnel - 11 workers Equipment used - NA Estimated % Complete - 15

Night Operations 1 vacuum truck and crew

Zone D:

Tactic - Removal of oil using snares and absorbent pads Personnel - 8 workers Equipment used - NA Estimated % Complete - 15

Zone E:

Tactic - Reinforced boom at current containment with snares
Removal of oil using snares and absorbent pads
Completed the installation of oleophilic fabric fencing in front of the existing beaver dam.
Personnel - 33 workers
Equipment used - NA
Estimated % Complete - 25

Waste Management

Frac tank contents were disposed of at the Clarke Well, approved by MS Oil and Gas Board and supported by DEQ. Approximately 240 bbls of oily liquid was disposed of into the Clarke Well on January 11th. The total to date is approximately 910 bbls.

All material removed from the impacted wetlands area are being staged in a central location for future disposal.

A waste management plan is being developed.

Health and Safety

Air monitoring to assure worker safety was conducted in all work areas with no elevated readings observed for CO, VOC's, H2S, LEL and Oxygen. Air monitoring will continue twice daily while operations are ongoing.

No reported accidents on site to date.

1/12/2014

RP has secured 2 amphibious vehicles and one land clearing piece of equipment to assist with access to impacted areas, to help move people in and out of the impacted area and to remove bagged pads and snares containing recovered oil.

RP engineering consultants are developing a contingency plan for future rain events covering the entire impacted area. These consultants also collected GPS points establishing zone boundaries and defining the extent of the impacted area. Approximately 7.8 acres of area was impacted by the spill.

In anticipation of the upcoming rain event, an RP task force installed a series of strategically located oleophilic fabric fences in order to prevent downstream migration of recoverable oil. These fences are located throughout the zones and in locations that will facilitate the collection of recoverable oil after the rain event. In addition, the RP constructed an underflow dam and collection area immediately downstream of the breakpoint in the flowline. Significant recoverable oil is present in the saturated soil surrounding the

flowline. The RP is preparing an excavation plan for this area. Please see Fig. 2 in the document section for the locations of these measures.

RP continues to address and resolve any outstanding access issues.

Field personnel onsite is approximately 118 people. Personnel have been broken into teams and each team assigned a designated work area (zone). For Zone reference see Work Zones (Fig. 1) in the documents section of this webpage.

Recovery Operations

Zone A:

Tactic - RP constructed an underflow dam between the blowout area and the impacted downstream area in order to prevent additional oil from migrating.

RP contracted engineers began delineation of the extent of subsurface oil contamination surrounding the break in the flowline. Significant oil is leaching from this area.

Personnel - 4-5

Equipment used - Trackhoe

Estimated % Complete - 75% complete for the removal of recoverable oil in Zone A, not including what

found around the pipe break.

Night Operations 1 vacuum truck and crew

Zone B:

Tactic - Developed trails to access oil
Removed oily leaves and vegetation
Removal of recoverable oil using snares and absorbent pads
Personnel - Three teams with 30 workers
Equipment used - 1 vacuum trucks
Estimated % Complete - 30

Night Operations 1 vacuum truck and crew

Zone C:

Tactic - Removal of oil using snares and absorbent pads Personnel - 36 workers Equipment used - 1 Vacuum truck Estimated % Complete - 30

Night Operations 1 vacuum truck and crew

Zone D:

Tactic - Removal of oil using snares and absorbent pads Personnel - 10 workers Equipment used - 1 vacuum truck Estimated % Complete - 70

Zone E:

Tactic - RP reinforced existing boom and snare at the beaver dam

Completed the installation of oleophilic fabric fencing in front of the existing beaver dam.

Removal of oil using snares and absorbent pads

Personnel - 33 workers Equipment used - NA Estimated % Complete - 90

NOTE ... Percent completes will rise and fall as the rain events occur with an overall uptrend as recoverable oil is removed. This effect is a byproduct of the natural flushing that occurs during rain events.

Waste Management

The total amount of disposed oily water mix at the Clarke Well to date is approximately 910 bbls. No disposal occurred on January 12th.

All material removed from the impacted area is being staged in a central location for future disposal.

A waste management plan is being developed.

Health and Safety

Air monitoring to assure worker safety was conducted in all work areas with no elevated readings observed for CO, VOC's, H2S, LEL and Oxygen. Air monitoring will continue twice daily while operations are ongoing.

No reported accidents on site to date.

1/13/2014

Throughout the course of the day a 1/2" inch rain event occurred on site. Observations throughout the day indicated that installed oleophilic fabric fencing was effective in capturing and removing oil in slow flowing

water or slow rising water areas. Water levels remained manageable due the long duration of the light rain event. Please see Fig. 2 in the document section of this website for the locations of these measures.

An amphibious vehicle with a land clearing attachment finished developing access to the impacted areas.

RP engineering consultants are developing a contingency plan for future rain events covering the entire impacted area. Approximately 7.8 acres of area was impacted by the spill.

The RP is preparing an excavation plan for the area around the blowout in the flowline. Significant recoverable oil is present in the saturated soil surrounding the flowline.

RP land management personnel were on site. RP continues to address and resolve any outstanding access issues.

Field personnel onsite is approximately 121 people. Personnel have been broken into teams and each team assigned a designated work area (zone). For Zone reference see Work Zones (Fig. 1) in the documents section of this webpage.

Recovery Operations

Zone A:

Tactic - The team in this zone also worked in zones B and C.

Removed bags loaded with oily pads and snares.

Developed trails to remove bags loaded with oily pads and snares.

Personnel - 27

Equipment used - 1 vacuum truck

Estimated % Complete - 60% complete for the removal of recoverable oil in Zone A. This does not not use the control of the con

the expected excavation around the pipe break.

Night Operations 1 vacuum truck and crew

Zone B:

Tactic - Replaced snare and boom

Removal of recoverable oil using snares and absorbent pads.

Removed bags loaded with oily pads and snares.

Personnel - 32 workers

Equipment used - 1 vacuum truck

Estimated % Complete - 35

Night Operations 1 vacuum truck and crew

Zone C:

Tactic - Removal of oil using snares and absorbent pads.

Removed bags loaded with oily pads and snares.

Personnel - 36 workers

Equipment used - NA

Estimated % Complete - 50

Night Operations 1 vacuum truck and crew

Zone D:

Tactic - Began developing access to impacted areas using a small marsh buggy with a clearing and grubbing

attachment. (4 of the 35 workers were dedicated to this activity)

Removal of oil using snares and absorbent pads

Personnel - 35 workers

Equipment used - NA

Estimated % Complete - 85

Zone E:

Tactic - RP reinforced existing boom and snare at the beaver dam

Removal of oil using snares and absorbent pads

Personnel - 31 workers Equipment used - NA

Estimated % Complete - 95

NOTE ... Percent completes will rise and fall as the rain events occur with an overall uptrend as recoverable oil is removed. This effect is a byproduct of the natural flushing that occurs during rain events.

Waste Management

The total amount of disposed oily water mix at the Clarke Well to date is approximately 1080 bbls. Approximately 170 bbls of oily water mix was disposed of today into the Clarke Well.

All material removed from the impacted area is being staged in a central location for future disposal. Two roll off boxes filled with oily pads, snares, boom and PPE were taken to the Waste Management Pine Ridge Landfill located in Meridian, MS. To date a total of 16.26 tons of solid waste has been sent to the landfill.

A waste management plan along with a waste disposal profile was submitted to EPA.

Health and Safety

No air monitoring was conducted today due to rain.

No reported accidents on site to date.

1/14/2014

Operations focused on removal of bagged pads and snares with recovered oil from the impacted area as well as maintenance of collection curtains. One amphibious vehicle (marsh buggy) towing an aluminum flatbottom boat was used to assist with the removal of bags and resource transportation. The removal of bags was conducted in zones B, C, D, and E.

Additional oleophilic fabric fencing was installed in strategic locations in order to prevent downstream migration of recoverable oil. Please see Fig. 2 in the document section of this website for the locations of these measures.

The second marsh buggy with a land clearing attachment finished developing access to the impacted areas

RP began clearing and grubbing operations around the blowout area in preparation for removal of impacted soil

RP engineering consultant's contingency plan for future rain events is being combined with an operations and maintenance plan. The plan will cover the next phase of operations after bulk removal of recoverable oil is accomplished. Approximately 7.8 acres of area was impacted by the spill.

The RP is preparing an excavation plan for the area around the blowout in the flowline. Significant recoverable oil is present in the saturated soil surrounding the flowline.

RP currently has a land management team onsite to handle access issues. RP continues to address and resolve any outstanding access issues.

Field personnel onsite is approximately 118 people. Personnel have been broken into teams and each team assigned a designated work area (zone). For Zone reference see Work Zones (Fig. 1) in the documents section of this webpage.

Recovery Operations

Zone A:

Tactic - A team of 14 personnel in this zone also worked in zones B, C, D and E replacing and repairing oleophilic fabric fencing, boom and snares.

Removed bags loaded with oily pads and snares.

Began clearing and grubbing in preparation for removal of impacted soil near blowout area

Personnel - 17 workers

Equipment used - 1 vacuum truck and 1 trackhoe

Estimated % Complete - 60% complete for the removal of recoverable oil in Zone A.

This estimate does not include the excavation at the flowline blowout.

Zone B:

Tactic - Source areas of oil near zone A were addressed.

Removal of recoverable oil using snares and absorbent pads.

Removed bags loaded with oily pads and snares.

Personnel - 33 workers

Equipment used - 1 vacuum truck

Estimated % Complete - 35

Zone C:

Tactic - Removal of oil using snares and absorbent pads.

Removed bags loaded with oily pads and snares.

Personnel - 34 workers

Equipment used - 1 vacuum truck and 2 leaf blowers

Estimated % Complete - 50

Zone D:

Tactic - Completed developing access to impacted areas using a marsh buggy with a clearing and grubbing attachment. (4 of the 17 workers were dedicated to this activity) Removal of oil using snares and absorbent pads

Removed bags loaded with oily pads and snares.

Personnel - 17 workers Equipment used - NA Estimated % Complete - 85

Zone E:

Tactic - Removal of oil using snares and absorbent pads.

Removed bags loaded with oily pads and snares in zones B, C, D and E

Personnel - 17 workers

Equipment used - 1 marsh buggy for bag removal

Estimated % Complete - 95

NOTE ... Percent completes will rise and fall as the rain events occur with an overall uptrend as recoverable oil is removed. This effect is a byproduct of the natural flushing that occurs during rain events.

Waste Management

The total amount of disposed oily water mix at the Clarke Well to date is approximately 1080 bbls. Approximately 360 bbls of oily water mix was disposed of today into the Clarke Well.

All material removed from the impacted area is being staged in a central location for future disposal. Two roll off boxes filled with oily pads, snares, boom and PPE were taken to the Waste Management Pine Ridge Landfill located in Meridian, MS. To date a total of 4 rolloff boxes and 31.75 tons of solid waste has been sent to the landfill

A waste management plan along with a waste disposal profile was submitted to EPA.

Health and Safety

Air monitoring to assure worker safety was conducted in all work areas with no elevated readings observed for CO, VOC's, H2S, LEL and Oxygen. Air monitoring will continue twice daily while operations are ongoing.

No reported accidents on site to date.

1/15/2014

Wetlands recovery operations have been divided into two phases:

Phase 1 - Bulk removal of recoverable oil

Phase 2 - Targeted removal of recoverable oil from remaining sources areas such as root balls and sandy deposition flats.

Wetlands recovery operations focused on removal of bagged pads and snares with recovered oil from the impacted area as well as maintenance of oleophilic fabric fence. One amphibious vehicle (marsh buggy) towing an aluminum flatbottom boat was used to assist with the removal of bags and resource transportation. The removal of bags was conducted in zones B, C, D, and E. Maintenance of oleophilic fabric fencing was conducted in all zones. Please see Fig. 2 in the document section of this website for the locations of these measures.

Clearing and grubbing operations continued in the future excavation area in preparation for removal of impacted soil. The RP engineering consultants submitted an excavation plan which was approved by Unified Command. Please see documents section for details. The areal extent is estimated at 16000 sqft.

RP engineer consultants have provided technical information used to assist operations in managing rainfall events over the 7.8 acre impacted area. Containment is adequate for a 1.5" rain event over a 24 hour period. Events beyond 1.5" may require pump around water diversion measures. The consultants will continue to develop an operations and maintenance plan. This plan will be used once the two phases of mechanical recovery measures are completed in each of the zones.

RP land management team has resolved remaining access with the 8 affected landowners.

Field personnel onsite total is approximately 132. Personnel have been broken into teams and each team assigned a designated work area (zone). For Zone reference see Work Zones (Fig. 1) in the documents section of this webpage.

Recovery Operations

Zone A (Phase 1 - Bulk removal of recoverable oil):

Tactic - Reconstruction of the underflow dam to accept more flow

Flowlines were flushed back to the tank battey in preperation of the excavation

Removed bags loaded with oily pads and snares.

Continued clearing and grubbing in preparation for removal of impacted soil near blowout area.

Task force replaced and repaired damaged oleophilic fabric fence (14 People)

Personnel -28 workers

Equipment used - 1 vacuum truck and 1 trackhoe

Estimated % Complete - 70% complete for the removal of recoverable oil in Zone A.

This estimate does not include the excavation at the flowline blowout.

Zone B (Phase 1 - Bulk removal of recoverable oil):

Tactic - Source areas of oil near zone A were addressed.

Removal of recoverable oil using snares and absorbent pads.

Removed bags loaded with oily pads and snares.

Moved recoverable oil to collection points using leaf blowers.

Task force replaced and repaired damaged oleophilic fabric fence (14 People)

Personnel - 33 workers

Equipment used - 1 vacuum truck and 1 leaf blower

Estimated % Complete - 50

Zone C (Phase 1 - Bulk removal of recoverable oil):

Tactic - Removal of oil using snares and absorbent pads.

Removed bags loaded with oily pads and snares and general housekeeping

Task force replaced and repaired damaged oleophilic fabric fence (14 People)

Personnel - 35 workers Equipment used - 2 leaf blowers Estimated % Complete - 60

Zone D (Phase 1 - Bulk removal of recoverable oil):

Tactic - Removal of oil using snares and absorbent pads

Removed bags loaded with oily pads and snares.

Task force replaced and repaired damaged oleophilic fabric fence (14 People)

Personnel - varies

Equipment used - 1 marsh buggy for bag removal

Estimated % Complete - 90

Zone E (Phase 1 - Bulk removal of recoverable oil):

Tactic - Removal of oil using snares and absorbent pads.

Removed bags loaded with oily pads and snares

Task force replaced and repaired damaged oleophilic fabric fence (14 People)

Personnel - 17 workers

Equipment used - 1 marsh buggy for bag removal

Estimated % Complete - 100

NOTE ... Percent completes will rise and fall as the rain events occur with an overall uptrend as recoverable oil is removed. This effect is a byproduct of the natural flushing that occurs during rain events.

Waste Management

The total amount of disposed oily water mix at the Clarke Well to date is approximately 1440 bbls. Approximately 260 bbls of oily water mix was disposed of today into the Clarke Well.

All material removed from the impacted area is being staged in a central location for future disposal. Two roll off boxes filled with oily pads, snares, boom and PPE were taken to the Waste Management Pine Ridge Landfill located in Meridian, MS. To date a total of 6 rolloff boxes and 47.21 tons of solid waste has been sent to the landfill.

A waste management plan along with a waste disposal profile was submitted to EPA.

Health and Safety

Air monitoring to assure worker safety was conducted in all work areas with no elevated readings observed for CO, VOC's, H2S, LEL and Oxygen. Air monitoring will continue twice daily while operations are ongoing.

No reported accidents on site to date.

1/16/2014

Operations have been divided into 2 primary tasks:

- 1. Wetlands Recovery
- 2. Excavation

Wetlands recovery operations have been divided into two phases:

Phase 1 - Bulk removal of recoverable oil

Phase 2 - Targeted removal of recoverable oil from remaining priority sources areas such as root balls and sandy deposition flats.

Wetlands recovery operations focused on removal of bagged pads and snares with recovered oil from the impacted area as well as maintenance of oleophilic fabric fence. One amphibious vehicle (marsh buggy) towing an aluminum flatbottom boat was used to assist with the removal of bags and resource transportation. The removal of bags was conducted in zones B, C, D, and E. Maintenance of oleophilic fabric fencing was conducted in all zones. Please see Fig. 2 in the document section of this website for the locations of these measures. Targeted use of low pressure stinger flushing is occurring in zones B and C in locations that are identified as priority areas. Early reconnaissance indicates that there are between 10 to 15 of these priority areas in zones B, C and D.

Excavation began in the flowline blowout location. This area covers approximately 16000 sqft. Please see the excavation workplan in the documents section for further detail. 21 loads of soil were sent to the landfill today.

RP engineer consultants have provided technical information used to assist operations in managing rainfall events over the 7.8 acre impacted area. Containment is adequate for a 1.5" rain event over a 24 hour period. Events beyond 1.5" may require pump around water diversion measures. The consultants will continue to develop an operations and maintenance plan. This plan will be used once the two phases of mechanical recovery measures are completed in each of the zones.

Field personnel onsite total is approximately 132. Personnel have been broken into teams and each team assigned a designated work area (zone). For Zone reference see Work Zones (Fig. 1) in the documents section of this webpage.

Wetlands Recovery Operations

Phase 1 - Bulk removal of recoverable oil

Zone A

Tactic - Task force replaced and repaired damaged oleophilic fabric fence Personnel -14 workers

Estimated % Complete - 90

Zone B

Tactic - Removal of recoverable oil using snares and absorbent pads.

Removed bags loaded with oily pads and snares.

Moved recoverable oil to collection points using leaf blowers.

Task force replaced and repaired damaged oleophilic fabric fence (8 People)

Personnel - 32 workers

Equipment used - 1 vacuum truck, 1 leaf blower and one wash pump

Estimated % Complete - 90

Zone C

Tactic - Removal of oil using snares and absorbent pads.

Removal of oil covered leaves and vegetation.

Removed bags loaded with oily pads and snares.

Task force replaced and repaired damaged oleophilic fabric fence (8 People)

Personnel - 30 workers

Equipment used - 2 leaf blowers

Estimated % Complete - 90

Zone D

Tactic - Removal of oil using snares and absorbent pads.

Removal of oil covered leaves and vegetation.

Removed bags loaded with oily pads and snares.

Task force replaced and repaired damaged oleophilic fabric fence (8 People)

Personnel - 26

Equipment used - 1 marsh buggy for bag removal

Estimated % Complete - 90

Zone E

Tactic - Removal of oil using snares and absorbent pads.

Removed bags loaded with oily pads and snares.

Task force replaced and repaired damaged oleophilic fabric fence (8 People)

Personnel - 8 workers

Equipment used - 1 marsh buggy for bag removal

Estimated % Complete - 100

Phase II Targeted Oil Removal in Priority Areas

Preliminary reconnaissance indicates between 10 to 15 priority areas located in zones B,C and D. Limited personnel and equipment were used today employing the tactic of low pressure stinger flushing of priority areas such as root ball clusters. Detailed tracking of tactics, personnel, equipment and percent complete will begin as Phase I reaches 100 % completion and Phase II activity accelerates.

NOTE ... Percent completes will rise and fall as the rain events occur with an overall uptrend as recoverable oil is removed. This effect is a byproduct of the natural flushing that occurs during rain events.

Excavation Operations (includes clearing/excavation/disposal/backfill/revegetation)

Tactic - Reconstruction of the underflow dam to accept more flow.

Began digging impacted soil near the flowline blowout.

Hauled 21 loads of impacted soil to landfill. Total weight 223.45 tons

Personnel - 24

Equipment used - 2 trackhoes, 12 dumptrucks, 1 front end loader and 2 wash pumps.

Estimated % Complete - 10

Waste Management

The total amount of disposed oily water mix at the Clarke Well to date is approximately 1440 bbls. No liquid was disposed of today into the Clarke Well.

All material removed from the impacted area is being staged in a central location for future disposal. No solid waste was sent to the landfill today. To date a total of 6 rolloff boxes and 47.21 tons of solid waste has been sent to the landfill.

21 loads of impacted soil were disposed of at the landfill. To date a total of 223.45 tons of impacted soil from the area around the flowline blowout has been removed and sent to the landfill.

Please see documents section for the approved waste management workplan.

Health and Safety

Air monitoring to assure worker safety was conducted in all work areas with no elevated readings observed

for CO, VOC's, H2S, LEL and Oxygen. Air monitoring will continue twice daily while operations are ongoing.

No reported accidents on site to date

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

A written Notice of Federal Interest was issued to and signed by the RP representative. RP is Moon-Hines-Tigrett of Ridgeland, MS. Unified Command is in effect comprising EPA OSC, DEQ SOSC and RP rep. MS Oil and Gas representative is on scene.

2.2 Planning Section

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2.3 Logistics Section

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2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

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3. Participating Entities

EPA USCG - GST MSDEQ MS Oil and Gas RP Contractors

4. Personnel On Site

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5. Definition of Terms

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6. Additional sources of information

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7. Situational Reference Materials

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