



BOBBY JINDAL
GOVERNOR

State of Louisiana
DEPARTMENT OF NATURAL RESOURCES
OFFICE OF CONSERVATION

SCOTT A. ANGELLE
SECRETARY

JAMES H. WELSH
COMMISSIONER OF CONSERVATION

June 15, 2012

Site Manager
Copolymer Rubber Chemical Corporation
5955 Scenic Hwy
Baton Rouge, LA 70821

Re: Conservation Order No. ENV 2012-GW011
Water Well Owner Groundwater Withdrawal Reporting Requirements

Dear Site Manager:

This letter is intended to provide guidance and assist you with complying with recent reporting requirements for applicable groundwater withdrawals from wells registered as owned by Copolymer Rubber Chemical Corporation. In summary, on May 23, 2012, the Office of Conservation (Conservation) issued Order No. ENV 2012-GW011 (Order) requiring Copolymer Rubber Chemical Corporation to provide current and projected short and long-term groundwater withdrawal reports to Conservation on or before September 28, 2012. The Order requires companies to submit "a written report of its company's current annual groundwater withdrawal volume per water well, projected near-term (within 5 years) annual groundwater withdrawal volume per existing and new well(s), projected long-term (5 to 30 years) annual groundwater withdrawal volume per existing and new well(s) and current, near-term and long-term plans for reducing groundwater withdrawal or preventing further migration of saltwater toward its wells." For your convenience, enclosed is a form that if properly completed and submitted prior to September 28, 2012 will satisfy the reporting requirements of the Order. Please note that all requirements of Conservation Order No. ENV 2012-GW011 are enforceable under the provisions of La. R.S. 38:3097.3.F. It is therefore important that Copolymer Rubber Chemical Corporation take all necessary steps to ensure that the requirements set forth in the Order are satisfactorily and timely addressed to prevent issuance of any enforcement actions by this office which may include an assessment of civil penalty.

Conservation staff looks forward to assisting Copolymer Rubber Chemical Corporation with any questions regarding the reporting requirements or guidance provided herewith. Please contact Brandon Breau at 225-342-5718 at your earliest convenience for assistance.

Yours very truly,

James H. Welsh

Commissioner of Conservation

Environmental Division

Post Office Box 94275 • Baton Rouge, Louisiana 70804-9275 • 617 North 3rd Street • 9th Floor • Baton Rouge, Louisiana 70802
Phone (225) 342-8244 • Fax (225) 242-3505 • www.dnr.state.la.us/conservation

An Equal Opportunity Employer

September 28, 2012

Office of Conservation

OCT 02 2012

Environmental Division

CERTIFIED MAIL - RETURN RECEIPT REQUESTED
RETURN RECEIPT# 7012 0470 0000 3734 3049

LA Department of Natural Resources
Office of Conservation
Environmental Division
Post Office Box 94275
Baton Rouge, LA 70804-9275

RE: CONSERVATION ORDER No. 2012-GW011
WATER WELL OWNER GROUNDWATER WITHDRAWAL
REPORTING REQUIREMENTS

Dear Brandon Breaux,

Enclosed, please find the requested information for the Louisiana Department of Natural Resources Office of Conservation Order No. Env 2012-GW011 communicated in a letter dated May 23, 2012 to Lion Copolymer, LLC. This enclosure contains Lion Copolymer's current, projected near-term (within 5 years), and projected long-term (5 to 30 years) annual groundwater withdrawal volume for Water Wells No. 033-656, 033-737, 033-1030, and 033-1230. Additionally, contained are the current, near-term, and long-term plans for reducing groundwater withdrawal or preventing further migration of saltwater toward its wells.

If you have any questions or need any further information, please contact Todd Rybicki at (225) 267-3516.

Sincerely,



Todd Rybicki
EHS Manager
ENCLOSURE

Louisiana Department of Natural Resources
Office of Conservation
Order No. ENV 2012-GW011

Baton Rouge Area Groundwater Usage Report Guidance Form

This form may be used to provide water use reporting as required by Order No. ENV 2012-GW011 (Order) or shall serve to guide well owners in the development of their responses to reporting requirements of the Order. Any questions on proper response to any item on this form or contained in the Order should be directed to Office of Conservation staff at 225-342-7222.

A. Well Registration Information

State Registration Water Well No.: 033-656

1. Registered Aquifer: 2000' Sand Southern Hill
2. Registered Well Owner: Lion Copolymer
3. Registered Owner Address: 5955 Scenic Hwy, Baton Rouge, La. 70805
4. Registered Well Locations: Latitude 30 30 10, Longitude 91 10 36

If any information listed in items A.1 – 4 is not correct, contact agency staff at 225-342-7222 for guidance on updating well registration information for this well or provide the correct information on the back of this form, date and provide certification signature on page 3 and submit the corrected registration information to the agency.

B. Current Use

1. Provide the total volume in gallons of groundwater withdrawn from the well in 2011.

gallons

2. Provide the total volume in gallons of groundwater withdrawn from the well from January 1, 2012 up to the date of submitting the water use report for this well.

gallons from January 1, 2012 through , 2012

Office of Conservation

C. Near-Term Use

Provide the total annual volume in gallons of groundwater projected to be withdrawn from this well within 5 years for each year starting from January 1, 2012 through December 31, 2016.

2012 Total Volume	306.298.000	gallons
2013 Total Volume	144.776.000	gallons
2014 Total Volume	39.866.000	gallons
2015 Total Volume	39.866.000	gallons
2016 Total Volume	39.866.000	gallons

Should well owner plans include the installation and use of any new well(s) from January 1, 2012 through December 31, 2016, provide details of the anticipated date of new well(s) installation and projected groundwater withdrawal on annual basis from each well completed through December 31, 2016. If using this form, supplemental information may be provided on the back of this page or by attachment.

D. Long-Term Use

Provide the total annual volume in gallons of groundwater projected to be withdrawn from this well each year starting from January 1, 2017 through December 31, 2041.

2017 Total Volume	66.189.000	gallons	2030 Total Volume	79.350.000	gallons
2018 Total Volume	66.189.000	gallons	2031 Total Volume	79.350.000	gallons
2019 Total Volume	66.189.000	gallons	2032 Total Volume	79.350.000	gallons
2020 Total Volume	66.189.000	gallons	2033 Total Volume	79.350.000	gallons
2021 Total Volume	66.189.000	gallons	2034 Total Volume	79.350.000	gallons
2022 Total Volume	66.189.000	gallons	2035 Total Volume	79.350.000	gallons
2023 Total Volume	66.189.000	gallons	2036 Total Volume	79.350.000	gallons
2024 Total Volume	66.189.000	gallons	2037 Total Volume	79.350.000	gallons
2025 Total Volume	66.189.000	gallons	2038 Total Volume	79.350.000	gallons
2026 Total Volume	66.189.000	gallons	2039 Total Volume	79.350.000	gallons
2027 Total Volume	66.189.000	gallons	2040 Total Volume	79.350.000	gallons
2028 Total Volume	66.189.000	gallons	2041 Total Volume	79.350.000	gallons
2029 Total Volume	66.189.000	gallons	2042 Total Volume	79.350.000	gallons

Should well owner plans include the installation and use of any new well(s) from January 1, 2017 through December 31, 2041, provide details of the anticipated date of new well(s) installation and projected groundwater withdrawal on annual basis from each well completed through December 31, 2041. If using this form, supplemental information may be provided on the back of this page or by attachment.

E. Groundwater Use Reduction Plans

Provide details of any current, near-term or long-term plans to reduce withdrawal of groundwater from this well or other plans to prevent further migration of saltwater toward this well. If using this form, you may use the space below to provide Groundwater Use Reduction Plans for this well and/or supplement with attached documentation.

Water well no. 033-656 is the primary source that supplies water to two (2) boilers for steam production for use throughout the facility. Currently, Lion Copolymer is evaluating process and utility areas to identify and eliminate surplus usage of groundwater. Lion Copolymer plans to reduce the withdrawal from water well no. 033-656 by purchasing steam and shutting down both boilers. This will reduce the withdrawal of groundwater by 226,948,000 gallons over the next 30 years. Additionally, Lion Copolymer will consider obtaining engineering support to develop a water balance for the facility to assist with identifying heavy users of groundwater; thereafter, review those users for opportunities to improve its efficiency. This support will also look at opportunities where reuse of water discharged from the facility is possible. Lion Copolymer is committed to assessing all areas for improvements to assist with preventing further migration of saltwater toward this well.

F. Certification

I certify that I am authorized to provide information on this matter on behalf of my company and that the information provided herein is true and correct to the best of my knowledge.

9-28-2012
DATE

TODD R. BICKEL
NAME
[Signature]
SIGNATURE

Louisiana Department of Natural Resources
Office of Conservation
Order No. ENV 2012-GW011

Baton Rouge Area Groundwater Usage Report Guidance Form

This form may be used to provide water use reporting as required by Order No. ENV 2012-GW011 (Order) or shall serve to guide well owners in the development of their responses to reporting requirements of the Order. Any questions on proper response to any item on this form or contained in the Order should be directed to Office of Conservation staff at 225-342-7222.

A. Well Registration Information

State Registration Water Well No.: 033-737

1. Registered Aquifer: 2000' Sand Southern Hill
2. Registered Well Owner: Lion Copolymer
3. Registered Owner Address: 5955 Scenic Hwy, Baton Rouge, La. 70805
4. Registered Well Locations: Latitude 30 30 05, Longitude 91 10 32

If any information listed in items A.1 – 4 is not correct, contact agency staff at 225-342-7222 for guidance on updating well registration information for this well or provide the correct information on the back of this form, date and provide certification signature on page 3 and submit the corrected registration information to the agency.

B. Current Use

1. Provide the total volume in gallons of groundwater withdrawn from the well in 2011.

gallons

2. Provide the total volume in gallons of groundwater withdrawn from the well from January 1, 2012 up to the date of submitting the water use report for this well.

gallons from January 1, 2012 through , 2012

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C. Near-Term Use

Provide the total annual volume in gallons of groundwater projected to be withdrawn from this well within 5 years for each year starting from January 1, 2012 through December 31, 2016.

2012 Total Volume	285.186.000	gallons
2013 Total Volume	550.040.000	gallons
2014 Total Volume	550.040.000	gallons
2015 Total Volume	550.040.000	gallons
2016 Total Volume	550.040.000	gallons

Should well owner plans include the installation and use of any new well(s) from January 1, 2012 through December 31, 2016, provide details of the anticipated date of new well(s) installation and projected groundwater withdrawal on annual basis from each well completed through December 31, 2016. If using this form, supplemental information may be provided on the back of this page or by attachment.

D. Long-Term Use

Provide the total annual volume in gallons of groundwater projected to be withdrawn from this well each year starting from January 1, 2017 through December 31, 2041.

2017 Total Volume	650.047.000	gallons	2030 Total Volume	700.050.000	gallons
2018 Total Volume	650.047.000	gallons	2031 Total Volume	700.050.000	gallons
2019 Total Volume	650.047.000	gallons	2032 Total Volume	700.050.000	gallons
2020 Total Volume	650.047.000	gallons	2033 Total Volume	700.050.000	gallons
2021 Total Volume	650.047.000	gallons	2034 Total Volume	700.050.000	gallons
2022 Total Volume	650.047.000	gallons	2035 Total Volume	700.050.000	gallons
2023 Total Volume	650.047.000	gallons	2036 Total Volume	700.050.000	gallons
2024 Total Volume	650.047.000	gallons	2037 Total Volume	700.050.000	gallons
2025 Total Volume	650.047.000	gallons	2038 Total Volume	700.050.000	gallons
2026 Total Volume	650.047.000	gallons	2039 Total Volume	700.050.000	gallons
2027 Total Volume	650.047.000	gallons	2040 Total Volume	700.050.000	gallons
2028 Total Volume	650.047.000	gallons	2041 Total Volume	700.050.000	gallons
2029 Total Volume	650.047.000	gallons	2042 Total Volume	700.050.000	gallons

Should well owner plans include the installation and use of any new well(s) from January 1, 2017 through December 31, 2041, provide details of the anticipated date of new well(s) installation and projected groundwater withdrawal on annual basis from each well completed through December 31, 2041. If using this form, supplemental information may be provided on the back of this page or by attachment.

E. Groundwater Use Reduction Plans

Provide details of any current, near-term or long-term plans to reduce withdrawal of groundwater from this well or other plans to prevent further migration of saltwater toward this well. If using this form, you may use the space below to provide Groundwater Use Reduction Plans for this well and/or supplement with attached documentation.

Water well no. 033-737 is primarily used as a backup to water wells 033-1230 and 033-1030. Currently, Lion Copolymer is evaluating process and utility areas to identify and eliminate surplus usage of groundwater. Lion Copolymer will consider obtaining engineering support to develop a water balance for the facility to assist with identifying heavy users of groundwater; thereafter, review those users for opportunities to improve its efficiency. This support is also to look at opportunities where reuse of water discharged from the facility is possible. Lion Copolymer is committed to assessing all areas for improvements to assist with preventing further migration of saltwater toward this well.

F. Certification

I certify that I am authorized to provide information on this matter on behalf of my company and that the information provided herein is true and correct to the best of my knowledge.

9-28-2012
DATE

Tom Ripich
NAME
[Signature]
SIGNATURE

Louisiana Department of Natural Resources
Office of Conservation
Order No. ENV 2012-GW011

Baton Rouge Area Groundwater Usage Report Guidance Form

This form may be used to provide water use reporting as required by Order No. ENV 2012-GW011 (Order) or shall serve to guide well owners in the development of their responses to reporting requirements of the Order. Any questions on proper response to any item on this form or contained in the Order should be directed to Office of Conservation staff at 225-342-7222.

A. Well Registration Information

State Registration Water Well No.: 033-1030

1. Registered Aquifer: 2000' Sand Southern Hill
2. Registered Well Owner: Lion Copolymer
3. Registered Owner Address: 5955 Scenic Hwy, Baton Rouge, La. 70805
4. Registered Well Locations: Latitude 30 30 05, Longitude 91 10 20

If any information listed in items A.1 – 4 is not correct, contact agency staff at 225-342-7222 for guidance on updating well registration information for this well or provide the correct information on the back of this form, date and provide certification signature on page 3 and submit the corrected registration information to the agency.

B. Current Use

1. Provide the total volume in gallons of groundwater withdrawn from the well in 2011.

gallons

2. Provide the total volume in gallons of groundwater withdrawn from the well from January 1, 2012 up to the date of submitting the water use report for this well.

gallons from January 1, 2012 through , 2012

Office of Conservation

OCT 02 2012

June 15, 2012

C. Near-Term Use

Provide the total annual volume in gallons of groundwater projected to be withdrawn from this well within 5 years for each year starting from January 1, 2012 through December 31, 2016.

2012 Total Volume	372.721.000	gallons
2013 Total Volume	265.184.000	gallons
2014 Total Volume	265.184.000	gallons
2015 Total Volume	265.184.000	gallons
2016 Total Volume	265.184.000	gallons

Should well owner plans include the installation and use of any new well(s) from January 1, 2012 through December 31, 2016, provide details of the anticipated date of new well(s) installation and projected groundwater withdrawal on annual basis from each well completed through December 31, 2016. If using this form, supplemental information may be provided on the back of this page or by attachment.

D. Long-Term Use

Provide the total annual volume in gallons of groundwater projected to be withdrawn from this well each year starting from January 1, 2017 through December 31, 2041.

2017 Total Volume	313.400.000	gallons	2030 Total Volume	337.507.000	gallons
2018 Total Volume	313.400.000	gallons	2031 Total Volume	337.507.000	gallons
2019 Total Volume	313.400.000	gallons	2032 Total Volume	337.507.000	gallons
2020 Total Volume	313.400.000	gallons	2033 Total Volume	337.507.000	gallons
2021 Total Volume	313.400.000	gallons	2034 Total Volume	337.507.000	gallons
2022 Total Volume	313.400.000	gallons	2035 Total Volume	337.507.000	gallons
2023 Total Volume	313.400.000	gallons	2036 Total Volume	337.507.000	gallons
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2027 Total Volume	313.400.000	gallons	2040 Total Volume	337.507.000	gallons
2028 Total Volume	313.400.000	gallons	2041 Total Volume	337.507.000	gallons
2029 Total Volume	313.400.000	gallons	2042 Total Volume	337.507.000	gallons

Should well owner plans include the installation and use of any new well(s) from January 1, 2017 through December 31, 2041, provide details of the anticipated date of new well(s) installation and projected groundwater withdrawal on annual basis from each well completed through December 31, 2041. If using this form, supplemental information may be provided on the back of this page or by attachment.

E. Groundwater Use Reduction Plans

Provide details of any current, near-term or long-term plans to reduce withdrawal of groundwater from this well or other plans to prevent further migration of saltwater toward this well. If using this form, you may use the space below to provide Groundwater Use Reduction Plans for this well and/or supplement with attached documentation.

Water well no. 033-1030 is the primary source of water for three cooling towers on-site which are utilized to cool process operations. Currently, Lion Copolymer is evaluating process and utility areas to identify and eliminate surplus usage of groundwater. Lion Copolymer will consider obtaining engineering support to develop a water balance for the facility to assist with identifying heavy users of groundwater; thereafter, review those users for opportunities to improve its efficiency. This support will also look at opportunities where reuse of water discharged from the facility is possible. Lion Copolymer is committed to assessing all areas for improvements to assist with preventing further migration of saltwater toward this well.

F. Certification

I certify that I am authorized to provide information on this matter on behalf of my company and that the information provided herein is true and correct to the best of my knowledge.

9-28-2012
DATE

Tom Ryzbecki
NAME
[Signature]
SIGNATURE

Louisiana Department of Natural Resources
Office of Conservation
Order No. ENV 2012-GW011

Baton Rouge Area Groundwater Usage Report Guidance Form

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A. Well Registration Information

State Registration Water Well No.: 033-1230

1. Registered Aquifer: 1200' Sand Southern Hill
2. Registered Well Owner: Lion Copolymer
3. Registered Owner Address: 5955 Scenic Hwy, Baton Rouge, La. 70805
4. Registered Well Locations: Latitude 30 30 16, Longitude 91 10 20

If any information listed in items A.1 – 4 is not correct, contact agency staff at 225-342-7222 for guidance on updating well registration information for this well or provide the correct information on the back of this form, date and provide certification signature on page 3 and submit the corrected registration information to the agency.

B. Current Use

1. Provide the total volume in gallons of groundwater withdrawn from the well in 2011.

gallons

2. Provide the total volume in gallons of groundwater withdrawn from the well from January 1, 2012 up to the date of submitting the water use report for this well.

gallons from January 1, 2012 through , 2012

C. Near-Term Use

Provide the total annual volume in gallons of groundwater projected to be withdrawn from this well within 5 years for each year starting from January 1, 2012 through December 31, 2016.

2012 Total Volume	285.186.000	gallons
2013 Total Volume	550.040.000	gallons
2014 Total Volume	550.040.000	gallons
2015 Total Volume	550.040.000	gallons
2016 Total Volume	550.040.000 °	gallons

Should well owner plans include the installation and use of any new well(s) from January 1, 2012 through December 31, 2016, provide details of the anticipated date of new well(s) installation and projected groundwater withdrawal on annual basis from each well completed through December 31, 2016. If using this form, supplemental information may be provided on the back of this page or by attachment.

D. Long-Term Use

Provide the total annual volume in gallons of groundwater projected to be withdrawn from this well each year starting from January 1, 2017 through December 31, 2041.

2017 Total Volume	650.047.000	gallons	2030 Total Volume	700.050.000	gallons
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2021 Total Volume	650.047.000	gallons	2034 Total Volume	700.050.000	gallons
2022 Total Volume	650.047.000	gallons	2035 Total Volume	700.050.000	gallons
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2026 Total Volume	650.047.000	gallons	2039 Total Volume	700.050.000	gallons
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2028 Total Volume	650.047.000	gallons	2041 Total Volume	700.050.000	gallons
2029 Total Volume	650.047.000	gallons	2042 Total Volume	700.050.000	gallons

Should well owner plans include the installation and use of any new well(s) from January 1, 2017 through December 31, 2041, provide details of the anticipated date of new well(s) installation and projected groundwater withdrawal on annual basis from each well completed through December 31, 2041. If using this form, supplemental information may be provided on the back of this page or by attachment.

E. Groundwater Use Reduction Plans

Provide details of any current, near-term or long-term plans to reduce withdrawal of groundwater from this well or other plans to prevent further migration of saltwater toward this well. If using this form, you may use the space below to provide Groundwater Use Reduction Plans for this well and/or supplement with attached documentation.

Water well no. 033-1230 is the primarily used for production and is the primary source for potable water for the facility. Currently, Lion Copolymer is evaluating process and utility areas to identify and eliminate surplus usage of groundwater. Additionally, Lion is continuing administrative controls to reduce the amount of water utilized throughout the facility. Lion Copolymer will consider obtaining engineering support to develop a water balance for the facility to assist with identifying heavy users of groundwater; thereafter, review those users for opportunities to improve its efficiency. Lion Copolymer is committed to assessing all areas for improvements to assist with preventing further migration of saltwater toward this well.

F. Certification

I certify that I am authorized to provide information on this matter on behalf of my company and that the information provided herein is true and correct to the best of my knowledge.

9-28-2012
DATE

Todd Rybicki
NAME
[Signature]
SIGNATURE