From: Allison, Craig
To: Braganza, Bonnie
Subject: Re: Application update
Date: Wednesday, December 07, 2016 6:15:29 AM

I will work on that and get it to you early next week. Thanks.

Regards,
Craig Allison
XTO Energy - EHS Department
Sent from my iPhone

On Dec 6, 2016, at 4:34 PM, Braganza, Bonnie <Braganza.Bonnie@epa.gov> wrote:

> Thank you for your quick response. It be nice to get a regulatory analyses for all the equipment in a tabular format, otherwise I may be able to do it with the information you have provided, if all the tank and other parameters are available in the application- size of tank, throughputs, engine HP, fuel use etc. Thanks Craig
>
> Bonnie Braganza P.E.
> Air Permits
> US Environmental Protection Agency
> Region 6
> 1445 Ross Ave, Dallas TX 75202
> 214-665-7340
>
> *The world moves at such a rapid rate that waiting to implement changes will leave you two steps behind*
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> ---
>
> **From:** Allison, Craig [mailto:Craig_Allison@xtoenergy.com]
> **Sent:** Tuesday, December 06, 2016 1:15 PM
> **To:** Braganza, Bonnie <Braganza.Bonnie@epa.gov>
> **Cc:** OConnor, Mike <Mike_OConnor@xtoenergy.com>
> **Subject:** RE: Application update
>
> Bonnie:
>
> I received your email yesterday. I am working on the response. I will send you a more detailed, formal response early next week since I will be working on other projects in Arkansas the rest of this week. The following information should address most of the issues raised in your previous email:
>
> **Regarding the Jicarilla Compressor Station:**
>
> - <!--[if !supportLists]--><!--[endif]-->NSPS OOOO does not apply to the compressor because the compressor was constructed in 2003, prior to the applicability date of August 23, 2011 for 40 CFR 60.5385 and it is also not a reciprocating or centrifugal compressor, therefore, the rule does not apply to the compressor station.
>
> **Regarding the wellsites:**
>
> - <!--[if !supportLists]--><!--[endif]-->NSPS OOOO and OOOOa is NOT applicable to any of the existing sources on the wellsites because the equipment was constructed, installed, and operated in 2006, prior to the August 23, 2011 effective date of the NSPS OOOO rule and prior to the September 18, 2015 effective date of NSPS OOOOa.
>
> **The only EXCEPTION** is that a portion of the OOOO rules that applies to one wellsite is that the LDAR requirements of NSPS OOOOa apply to the Jicarilla Apache 14G location due to the well being hydraulically fractured in March of 2016, after the 9/18/15 effective date. The hydraulic fracture pulled the well into the semi-annual LDAR inspection requirements stated in 40 cfr 60.5397a (a) as per 40 cfr 60.5365a (a)(1); and, 60.5365a (i)(3)(iii).
>
> **The regulatory citations for the OOOOa rule applicability to the Jicarilla Apache 14G wellsite are as follows:**
>
> **§60.5365a Am I subject to this subpart?**
>
> You are subject to the applicable provisions of this subpart if you are the owner or operator of one or more of the onshore affected facilities listed in paragraphs (a) through (j) of this section for which you commence construction, modification, or reconstruction after September 18, 2015.
> (a) Each well affected facility, which is a single well that conducts a well completion operation following hydraulic fracturing or refracturing. The provisions of this paragraph do not affect the affected facility status of well sites for the purposes of

§60.5397a. The provisions of paragraphs (a)(1) through (4) of this section apply to wells that are hydraulically refractured:

(1) A well that conducts a well completion operation following hydraulic refracturing is not an affected facility, provided that the requirements of §60.5375a(a)(1) through (4) are met. However, hydraulic refracturing of a well constitutes a modification of the well site for purposes of paragraph (i)(3)(iii) of this section, regardless of affected facility status of the well itself.

(i) Except as provided in §60.5365a(i)(2), the collection of fugitive emissions components at a well site, as defined in §60.5430a, is an affected facility.

(3) **For purposes of §60.5397a**, a "modification" to a well site occurs when:

(iii) A well at an existing well site is hydraulically refractured.

§60.5397a What fugitive emissions GHG and VOC standards apply to the affected facility which is the collection of fugitive emissions components at a well site and the affected facility which is the collection of fugitive emissions components at a compressor station?

For each affected facility under §60.5365a(i) and (j), you must reduce GHG (in the form of a limitation on emissions of methane) and VOC emissions by complying with the requirements of paragraphs (a) through (j) of this section. These requirements are independent of the closed vent system and cover requirements in §60.5411a.

(a) You must monitor all fugitive emission components, as defined in §60.5430a, in accordance with paragraphs (b) through (g) of this section. You must repair all sources of fugitive emissions in accordance with paragraph (h) of this section. You must keep records in accordance with paragraph (i) of this section and report in accordance with paragraph (j) of this section. For purposes of this section, fugitive emissions are defined as: Any visible emission from a fugitive emissions component observed using optical gas imaging or an instrument reading of 500 ppm or greater using Method 21.

(b) You must develop an emissions monitoring plan that covers the collection of fugitive emissions components at well sites and compressor stations within each company-defined area in accordance with paragraphs (c) and (d) of this section.

(c) Fugitive emissions monitoring plans must include the elements specified in paragraphs (c)(1) through (8) of this section, at a minimum.

(1) Frequency for conducting surveys. Surveys must be conducted at least as frequently as required by paragraphs (f) and (g) of this section.

(f)(1) You must conduct an initial monitoring survey within 60 days of the startup of production, as defined in §60.5430a, for each collection of fugitive emissions components at a new well site or by June 3, 2017, whichever is later. For a modified collection of fugitive emissions components at a well site, the initial monitoring survey must be conducted within 60 days of the first day of production for each collection of fugitive emission components after the modification **or by June 3, 2017, whichever is later**.

(g) A monitoring survey of each collection of fugitive emissions components at a well site or at a compressor station must be performed at the frequencies specified in paragraphs (g)(1) and (2) of this section, with the exceptions noted in paragraphs (g)(3) and (4) of this section.

(1) A monitoring survey of each collection of fugitive emissions components at a well site within a company-defined area must be conducted **at least semiannually after the initial survey**. Consecutive semiannual monitoring surveys must be conducted at least 4 months apart.

The information for the current engine on the location is, as follows:

Engine No.	Description	Construction Date	Fuel Fired	Rated Capacity (hp)	Max Firing Rate			Manufacturer	Serial#
					MMBTU/yr	MMBTU/day	MMBTU/hr		
E1	Caterpillar 3512	5/16/2002	Fuel Gas	1004	62,371	171	7.12	Caterpillar	SN 7NJ00895

The other engine (E2) was permanently removed from the location on or about 2013.

Let me know if you need anything else. I will send the formal Regulatory analysis early next week. Thanks.

Regards,

Craig Allison
EH&S Advisor
Environmental Health & Safety
Office: 817-885-2672 | Cell: 817-201-2379 | Fax: 817-885-1847
XTO ENERGY INC., an ExxonMobil subsidiary
810 Houston Street, Fort Worth, Texas 76102

From: Braganza, Bonnie [mailto:Braganza.Bonnie@epa.gov]
Sent: Monday, December 05, 2016 11:53 AM
To: Allison, Craig

Subject: Application update

I need to know if these are hydraulically fractured wells and why the NSPS 60.5630 does not apply to these wells. Please confirm if NSPS OOOO applies. Also please review the recent oil and gas rules to determine applicability. Please refer to the NMGC permit application where details of all applicability are given. These permit applications are available at: https://www.epa.gov/caa-permitting/tribal-nsr-permits-epas-south-central-region-laguna-pueblo-redonda-compressor-station For your convenience I have included a pdf copy of the appln.

Please review Section 8 applicability/non-applicability and provide me information for all equipment listed in the permit. Some of this information may have been provided in the original application but to simplify it for the public and our tribes whom we are required to consult with, its best to update with a complete application or sections.
I appreciate you expedite this information. As I draft the permit with information that is not present in the permit, I am writing it with all the applicable Federal regulations such as NSPS OOOO etc. thank you. Serial number of the engine that remains and construction date is needed as well a statement stating that the other compressor engine has been removed from the site.

Thank you for providing the map with the well sites for drafting my technical support document.

Thank you.

Bonnie Braganza P.E.
Air Permits
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