UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 28 2016

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Registered Agents for Anadarko Petroleum Corporation and Affiliate and Subsidiary Companies:

Ft. Lupton Complex (Ft. Lupton, Lancaster, and Platte Valley Plants) and Wattenberg Gas Plant
The Corporation Company
1675 Broadway, Suite 1200
Denver, Colorado 80202

Ramsey Plant
CT Corporation System
1999 Bryan St., Ste. 900
Dallas, Texas 75201-3136

Chipeta Plant and Natural Buttes Plant
CT Corporation System
1108 East South Union Ave
Midvale, Utah 84047

Granger Gas Plant
CT Corporation System
1720 Carey Ave., Ste 200
Cheyenne, Wyoming 82001

Hilight Complex and Patrick Draw Gas Plant
CT Corporation System
1908 Thomes Ave
Cheyenne, Wyoming 82001

Re: Section 114(a) Information Request for Anadarko Petroleum Corporation and affiliate or subsidiary companies

Dear Sir/Madam:

The EPA hereby requests information from Anadarko Petroleum Corporation and Anadarko Petroleum Corporation affiliate or subsidiary companies (Anadarko) regarding implementation of online repair techniques which may be used to reduce emissions of Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) from leaking process equipment, without having to delay repair until the next process unit shutdown in order to eliminate emissions. The EPA requests this information to determine Anadarko's compliance with one or more requirements under the following regulations:

- 40 CFR Part 60 Subpart KKK, the Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011;
- 40 CFR Part 60 Subpart OOOO, the Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution;

- 40 CFR Part 63 Subpart HH, the National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities;

  and referenced regulations at:

- 40 CFR Part 60 Subpart VV, the Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006, and specific requirements under § 60.482-9 Standards: Delay of repair;
- 40 CFR Part 60 Subpart VVa, the Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, and specific requirements under § 60.482-9a Standards: Delay of repair; and
- 40 CFR Part 61 Subpart V, the National Emission Standard for Equipment Leaks (Fugitive Emission Sources), and specific requirements under § 61.242-10 Standards: Delay of repair.

This Request for Information is being made under section 114(a) of the Clean Air Act (CAA or Act), 42 U.S.C. § 7414(a). Anadarko's response to this Request for Information is due within **thirty (30) days** of its receipt of this letter.

Pursuant to section 114(a) of Act, the Administrator of the EPA is authorized to require any person who owns or operates an emissions source to establish and maintain records, make reports, sample emissions (in accordance with the procedures and methods that the Administrator shall prescribe) and provide such other information as she may reasonably require for the purposes of determining whether such person is in violation of any provision of the CAA. This authority has been delegated to the undersigned official.

Applicable definitions, questions, certification requirements, and business confidentiality claim assertion and substantiation requirements can be found at Enclosures 1-4 to this letter, respectively.

Failure to provide the required information is a violation of the CAA and may result in one or more of the following actions: 1) issuance of an administrative penalty order pursuant to section 113(d) of the CAA, 42 U.S.C. § 7413(d); 2) issuance of an order requiring compliance with this Request for Information; 3) the initiation of a civil action pursuant to section 113(b) of the CAA, 42 U.S.C. § 7413(b); and/or 4) any other action authorized under the CAA. In addition, knowingly providing false information in response to this Request for Information may be actionable under section 113(c) of the CAA, 42 U.S.C. § 7413(c), and 18 U.S.C. §§ 1001 and 1341. The information you provide may be used by the EPA in administrative, civil, and criminal proceedings.

Under section 114(c) of the CAA, 42 U.S.C. § 7414(c), and pursuant to regulations at 40 C.F.R. Part 2, including 40 C.F.R. § 2.301, you are entitled to claim as confidential any information you provide to the EPA which involves trade secrets and is regarded as confidential business information by you. For such information, you may request that the EPA treat such information as confidential. Any such claim for confidentiality must conform to the requirements of 40 C.F.R. § 2.203(b). *Note that emissions information is not considered confidential under section 114(c).* Information you supply will be treated as confidential business information to the degree determined to be appropriate according to the

regulations. If you fail to furnish a business confidentiality claim with your response to this Request for Information, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

YOU MUST SUBMIT ALL RESPONSIVE INFORMATION: ***Whether or not you make a claim of confidentiality.***

Please submit your response to this Request for Information to:

U.S. Environmental Protection Agency, Region 8
Technical Enforcement Program (8ENF-AT)
Office of Enforcement, Compliance and Environmental Justice
1595 Wynkoop Street
Denver, Colorado 80202-1129
Attention: Joseph Wilwerding

If you have any questions regarding this Request for Information, please contact Joseph Wilwerding at 303-312-6729, or your counsel may contact Jessica Portmess, at 303-312-7026.

Sincerely,

Phillip A. Brooks, Director
Air Enforcement Division

Enclosure:
1) Definitions
2) Information Requested
3) Statement of Certification
4) Confidential Information

cc: Steve Thompson, U.S. Environmental Protection Agency, Region 6
Shannon McMillan, Colorado Department of Public Health and Environment
Bryce Bird, Utah Department of Environmental Quality
Nancy Vehr, Wyoming Department of Environmental Quality
Bryan H. Sinclair, Texas Commission on Environmental Quality
Jessica Portmess, R8ENF-L
Brenda Morris, R8ENF-L
Joe Wilwerding, R8ENF-AT
Laurie Ostrand, R8ENF-AT
Greg Fried, EPA-Headquarters

ENCLOSURE 1:

A. DEFINITIONS

All terms used in this Request for Information will have their ordinary meaning unless such terms are defined in the CAA, other CAA implementing regulations (e.g. Subpart HH, Subpart VV, Subpart VVa, Subpart KKK, or Subpart OOOO), or otherwise defined herein, in which case use the definition in the CAA, the regulations, or those contained herein.

1. The term "**Act**" or "**CAA**" shall mean the Clean Air Act, 42 U.S.C. §§ 7401 et seq.

2. The term "**drill and tap repair**" or "**drill and tap repair method**" shall mean a process by which injectable packing or sealant material is injected through an adapter into the stuffing box of a valve. The injectable packing/sealant can replace lost packing material and stop a leak. The valve does not need to be disassembled or taken out of service before the procedure is performed. To affix the adapter to the stuffing box of the valve, a hole is drilled into the stuffing box and tapped with threads, and the adapter is screwed into place.

3. The term "**EPA**" shall mean the United States Environmental Protection Agency.

4. The term "**equipment**" shall mean each pump, pressure relief device, open-ended valve or line, valve, compressor, sampling connection system, and flange or other connector that is in VOC service, VHAP service, or wet gas service.

5. The term "**Subpart HH**" shall mean the National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities, 40 C.F.R. §§ 63.760 et seq.

6. The term "**Subpart KKK**" shall mean the Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011, 40 C.F.R. §§ 60.630 et seq.

7. The term "**Subpart OOOO**" shall mean the Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution, 40 C.F.R. §§ 60.5360 et seq.

8. The term "**Subpart VV**" shall mean the Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006, 40 C.F.R. §§ 60.480 et seq.

9. The term "**Subpart VVa**" shall mean the Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, 40 C.F.R. §§ 60.480a et seq.

ENCLOSURE 2:

INFORMATION REQUESTED:

1. For each of the facilities owned or operated by Anadarko listed below, please state "yes" or "no" to indicate whether or not **the drill and tap repair method** has been performed on any valve or component in steam, hydrocarbon, or other product service at the facility in the 10 years prior to this request:

Plant Name	State	County Name	Zip Code	Drill and Tap Performed w/in the last 10 years (Yes/No)
Ft. Lupton Complex (Ft. Lupton, Lancaster, Platte Valley)	CO	Weld	80621	
Wattenberg Gas Plant	CO	Adams	80019	
Ramsey Plant	TX	Reeves	79770	
Chipeta Plant	UT	Uintah	84078	
Natural Buttes Plant	UT	Uintah	82008	
Granger Gas Plant	WY	Sweetwater	82935	
Hilight Complex	WY	Campbell	82718	
Patrick Draw Gas Plant	WY	Sweetwater	82901	

2. If you answered "yes" with regard to any facility referenced in question 1, please provide the following, by facility:

    a. The date the **drill and tap repair** was performed;
    b. The name of the company, contractor, and individual(s) that performed the **drill and tap repair**;
    c. The type of valve or **equipment** on which the **drill and tap repair method** was performed;
    d. The type of product or material service for the valve or **equipment** where the **drill and tap repair** was performed (hydrocarbon, steam, etc);
    e. The cost billed for the **drill and tap repair** if performed by a contractor; and
    f. Information provided by the **equipment** manufacturer stating the **drill and tap repair** had invalidated product warranties for the **equipment** which received the repair.

3. If you answered "no" with regard to any facility referenced in question 1, please provide the following, by facility:

    a. Copies of all communications with **drill and tap repair** service providers about performing **drill and tap repairs** at the facility;
    b. The reason, if a **drill and tap repair** service provider was consulted on a repair, why the **drill and tap repair** was not performed; and

c. The title and level of the facility position at which the decision was ultimately made not to perform the **drill and tap repair**.

4. Provide any written company policies or guidance created by Anadarko regarding use or implementation of the **drill and tap repair method** in the last 10 years, and the date the policy or guidance was created.

5. State whether Anadarko has any actual knowledge of a **drill and tap repair** performed at a natural gas processing plant that caused and/or was a factor in a safety-related incident at the facility.

6. If you answered question 5 in the affirmative, please provide the basis of Anadarko's knowledge and a detailed explanation of the safety-related incident that resulted from the use of the **drill and tap repair method**. Please include the name of the facility where the incident occurred, and the information requested under questions 2(a)-(d) for the **drill and tap repair**.

ENCLOSURE 3:

STATEMENT OF CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations pursuant to section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

_____
(Signature)

_____
(Printed Name)

_____
(Title)

_____
(Date)

ENCLOSURE 4:

Confidential Business Information (CBI) Assertion and Substantiation Requirements

You may assert a business confidentiality claim covering all or part of the information you provide in response to this Request for Information for any business information entitled to confidential treatment under section 114(c) of the Clean Air Act (CAA), 42 U.S.C. § 7414, and 40 C.F.R. Part 2, subpart B. Under section 114(c) of the CAA, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 C.F.R. Part 2, subpart B, business confidentiality means "the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information." See 40 C.F.R. § 2.201(e).

Information covered by a claim of business confidentiality will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in section 114(c) of the CAA and 40 C.F.R. Part 2, subpart B. If you fail to furnish a business confidentiality claim with your response to this Request for Information, the EPA will construe your failure as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential" at the time you submit your response to this Request for Information. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by the EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

The criteria the EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 C.F.R. § 2.201(e); (2) you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so;
(3) the information is not and has not been reasonably obtainable by legitimate means without your consent; and (4) the disclosure of the information is likely to cause substantial harm to your business's competitive position. See 40 C.F.R. § 2.208 (a)-(e). Emission data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. See 42 U.S.C. § 7414(c); 40 C.F.R. § 2.301(e).

If you assert a claim of business confidentiality in connection with information and documents forwarded in response to this Request for Information, in accordance with 40 C.F.R. § 2.204(e)(4), the EPA is requesting that you answer the following questions with respect to any information or document for which you assert a claim of business confidentiality:

1. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.

2. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you have specified.

3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?

4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?

5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.

6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

Submit your answers to the above questions concurrently with your response to this information request if you have claimed any information as business confidential. See 40 C.F.R. § 2.204(e)(2). Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline. The EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1). Please submit your comments to:

Jessica Portmess
U.S. EPA Region 8
1595 Wynkoop Street (ENF-L)
Denver, CO 80202-1129
303-312-7026

Pursuant to 40 C.F.R. § 2.205(c), you are hereby advised that information you submit as part of your comments may be regarded by the EPA as entitled to confidential treatment if, when it is received by the EPA, it is marked in accordance with 40 C.F.R. § 2.203(b). You may assert a business confidentiality claim covering all or part of your response to these questions, as provided in 40 C.F.R. § 2.203(b). See 40 C.F.R. § 2.204(e)(6). Information covered by such a claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the CAA and 40 C.F.R. Part 2. The EPA will construe the failure to furnish a confidentiality claim with your comments as a waiver of that claim, and the information may be made available to the public without further notice to you.