Message

From: Chapman, Apple [Chapman.Apple@epa.gov]
Sent: 3/22/2018 5:11:15 PM
To: Kenney, James [Kenney.James@epa.gov]
Subject: FW: Wells Redevelopment in San Juan Basin, New Mexico

Ms. Apple Chapman |Deputy Director, Air Enforcement Division | U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW, Washington DC, 20004 |202-564-5666 (office)|202-841-6076 (mobile)|

From: Thompson, Steve
Sent: Monday, March 12, 2018 9:46 AM
To: Chapman, Apple <Chapman.Apple@epa.gov>
Cc: Larson, Darrin <Larson.Darrin@epa.gov>; Kaleri, Cynthia <kaleri.cynthia@epa.gov>
Subject: FW: Wells Redevelopment in San Juan Basin, New Mexico

Apple,
Here is the email correspondence to the company that was sent on Friday. We should have a clearer picture tomorrow when we receive the information but this gives the background.

Steve

From: Kaleri, Cynthia
Sent: Friday, March 09, 2018 4:38 PM
To: Matt Henderson <mhenderson@hilcorp.com>
Cc: Larson, Darrin <Larson.Darrin@epa.gov>
Subject: Wells Redevelopment in San Juan Basin, New Mexico

Hello Matt,

I just wanted to follow-up with this e-mail to help ensure that information you had planned to send us next Tuesday morning (by lunchtime) would include some key information that we need. We appreciate ya'll taking the time to answer our questions.

As discussed earlier today, EPA received a complaint by a landowner in New Mexico. He was concerned because Hilcorp's field rep told him that "green completions" would not be used in hydraulically refracturing 8 existing wells this week in the San Juan Basin **Ex. 4 CBI** **Ex. 4 CBI** This was the reason I contacted Hilcorp, but I failed to ask you exactly how many wells are being redeveloped by Hilcorp and when. **Could you please be sure and let us know the number of wells being redeveloped and the general schedule for each well completion planned for the same basin?**

You wondered where in the rule "green completion" was defined, and I agree the term is sometimes used interchangeably with "Reduced Emission Completion" (REC). REC is the term discussed within the preamble to the NSPS Subpart OOOOa final rule and defined in the rule itself. I thought it was better to just jump into the requirements for flowback stages and the reporting requirements for RECs to help follow-up on the concerns voiced. Thanks for looking at the rule requirements from this aspect with me since that is really the point.

The rule itself defines *flowback* and *two stages for flowback* for purposes of the various requirements; reporting requirements help document implementation during the entire flowback period of a well. Of course, requirements

at 40 CFR § 60.5375a(a) do differentiate those requirements for "Non-Low Pressure, Non-Delineation, and Non-Wildcat" Wells (and that's what I was looking at as we discussed Hilcorp's completions).

You had stated that ya'll were in the initial flowback stage, which has slightly different requirements from the separation flowback stage. **I should have asked, but ya'll do have a separator onsite during the entire flowback period though, yes?** You did say that ya'll were ***not*** venting or flaring during the separation flowback stage. So please do let me know if I misunderstood this point and please also let me know if ya'll do have a separator onsite during the entire flowback period ... this all might be covered in ya'lls **procedures** (which you agreed to send), but perhaps you can clarify directly in your e-mail, too, since it is an important point.

I also understood that you said the **agreement ya'll had with the Bureau of Land Management (BLM)** had provisions for complying with NSPS Subpart OOOOa and that you could provide that agreement with BLM to help us in our overall understanding of the requirement to meet NSPS Subpart OOOOa (within the agreement).

Hope the above recap helps and here's a summary of the information needed:

1. Total Number of Wells Being Redeveloped in San Juan Basin by Hilcorp and Timeframe (general schedule) for Completions
2. Hilcorp's Procedures for Well Redevelopment & Completions
3. Hilcorp's Agreement with BLM for Redevelopment/Completions on Federal Land {*which may include item 2, above*}
4. Basic completion information on each well being redeveloped – ID Number, Location, Dates of Flowback, Separator Onsite, Hilcorp's determination of REC at the well, etc. {you can review **§ 60.5420a** for help on reporting elements required for well sites under the rule}

Thanks so much for your time today, and I look forward to information to be submitted next week by e-mail. Feel free to call with any questions prior to that time,

Cynthia J. Kaleri
Enforcement Officer, EPA Region 6

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