Message

From: Klepp, Robert [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1857DAFCBCC441888C06A473F38D0D93-BKLEPP]
Sent: 3/14/2019 8:45:20 PM
To: Eric P. Waeckerlin [EPWaeckerlin@hollandhart.com]
Subject: RE: Hilcorp Energy Company - FOV and CAA 114 information Request Follow-up
Attachments: Hilcorp_Energy_CAA_114_RFI_3_14_19.pdf; Hilcorp_Energy_FOV_3_14_19.pdf

Eric,

Attached is the final signed FOV. I am including both the FOV and CAA 114 information request in an abundance of caution to avoid version control concerns.

Thank you,

Bob

Robert G. Klepp, Attorney
Office of Civil Enforcement -- Air Enforcement Division
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
(202) 564-5805

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From: Klepp, Robert
Sent: Thursday, March 14, 2019 3:26 PM
To: 'Eric P. Waeckerlin' <EPWaeckerlin@hollandhart.com>
Subject: RE: Hilcorp Energy Company - FOV and CAA 114 information Request Follow-up

Eric,
Please disregard the version of the FOV inadvertently included in the email below. A final clean version is forthcoming.
Thanks,
Bob

Robert G. Klepp, Attorney
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From: Klepp, Robert
Sent: Thursday, March 14, 2019 2:49 PM
To: 'Eric P. Waeckerlin' <EPWaeckerlin@hollandhart.com>
Subject: Hilcorp Energy Company - FOV and CAA 114 information Request Follow-up

Eric,

Per my voicemail to you just now. I am courtesy copying you on a finding of violation (FOV) and a follow-up CAA 114 information request. EPA is sending both the FOV and the CAA 144 information request today to Hilcorp via certified mail.

The FOV is with regard to Hilcorp's San Jacinto 6E well. On the basis of facts presented in the Hilcorp CAA 114 response received on January 15, 2019, the EPA has determined that Hilcorp violated the requirement under NSPS Subpart OOOOa to route all separated gas during the well completion phase of natural gas production in compliance with reduced emission provisions, i.e., green completion requirements.

The follow-up 114 request is self-explanatory and follows up on Hilcorp's January 15 responses regarding separator operations during flowback and associated OOOOa regulatory requirements.

I am happy to discuss these matters further at your convenience.
Bob

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