Message

From: Schneider, Matthew [Schneider.Matthew@epa.gov]
Sent: 7/26/2018 1:19:31 PM
To: Williams, Christopher [Williams.Christopher@epa.gov]; McClintock, Katie [McClintock.Katie@epa.gov]
CC: Bustamante, Armando [Bustamante.Armando@epa.gov]; Connell, Rebecca [Connell.Rebecca@epa.gov]; Muller, Lori [muller.lori@epa.gov]
Subject: RE: Hwy 30 & Little Willow Programs - Additional information requested

Thanks Katie and Chris,

Ex. 5 DP & Ex. 7(E)

Thanks!
-Matt

From: Williams, Christopher
Sent: Thursday, July 26, 2018 7:12 AM
To: McClintock, Katie <McClintock.Katie@epa.gov>
Cc: Schneider, Matthew <Schneider.Matthew@epa.gov>; Bustamante, Armando <Bustamante.Armando@epa.gov>; Connell, Rebecca <Connell.Rebecca@epa.gov>; Muller, Lori <muller.lori@epa.gov>
Subject: Re: Hwy 30 & Little Willow Programs - Additional information requested

Katie, Matt, and All:

Ex. 5 DP & Ex. 7(E)

Ex. 5 DP & Ex. 7(E)

Thanks,

Chris

On Jul 25, 2018, at 7:57 PM, McClintock, Katie <McClintock.Katie@epa.gov> wrote:

Ex. 5 DP & Ex. 7(E)

Thoughts?

Sent from my iPhone

On Jul 25, 2018, at 2:06 PM, Schneider, Matthew <Schneider.Matthew@epa.gov> wrote:

Chris and Katie, I just received this request from Alta Mesa to extend their response date to August 20. As we discussed today about the expected report date, if we except this request, I will not be able to complete the report by the draft date proposed in the project agreement. As you know, I will also be out of the office for approximately 5 weeks beginning at/near that time, so I'm not sure how long the report will be delayed.

Ex. 5 DP & Ex. 7(E)

Ex. 5 DP & Ex. 7(E)

Please let me know what you would like us to do. Thank you,

-Matt

From: Michael Christian [mailto:mchristian@mch-lawyer.com]
Sent: Wednesday, July 25, 2018 1:46 PM
To: Wade Moore <WMoore@high-mesa.com>; Schneider, Matthew <Schneider.Matthew@epa.gov>
Cc: Jeff Janik <JJanik@high-mesa.com>; Matt Frondorf <matt.frondorf@bexarenergy.com>; Bustamante, Armando <Bustamante.Armando@epa.gov>; Robert Williams (TEAM) <Robert.Williams@TeamInc.com>; Billy Wolcott <bwolcott@wolcottenvironmental.com>
Subject: RE: Hwy 30 & Little Willow Programs - Additional information requested

Mr. Schneider –

I am an attorney in Boise, and I represent High Mesa Holdings and Northwest Gas Processing. They have asked me to contact you and request an extension of time to respond to your request for information. HM and NWGP are marshaling internal and external personnel to provide a complete response, but input from multiple individuals is necessary. They anticipate that a complete response can be made by August 20. I suggest that an extension of time to respond is reasonable as good faith work on issues identified in the inspection has been ongoing, Wade Moore has been keeping you informed as that work progresses and I understand he has undertaken to supply with the information he has immediately available, and the narrative information you have requested is likely to be extensive.

I understand that Wade's attention to date has mostly been devoted to the on-site work items. However, HM and NWGP will endeavor to send responses to your individual requests as they are completed, as Wade has been doing with respect to the work items.

Thanks for your consideration of this request.

Michael Christian
MARCUS, CHRISTIAN, HARDEE & DAVIES, LLP
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From: Wade Moore <WMoore@high-mesa.com>
Sent: Thursday, July 19, 2018 1:12 PM
To: Schneider, Matthew <Schneider.Matthew@epa.gov>
Cc: Jeff Janik <JJanik@high-mesa.com>; Michael Christian <mchristian@mch-lawyer.com>; Matt Frondorf <matt.frondorf@bexarenergy.com>; Bustamante, Armando <Bustamante.Armando@epa.gov>; Robert Williams (TEAM) <Robert.Williams@TeamInc.com>; Billy Wolcott <bwolcott@wolcottenvironmental.com>
Subject: RE: Hwy 30 & Little Willow Programs - Additional information requested

Matt,
Thanks for sending out videos, will see the below request goes, but lot to put together.
Thanks,

From: Schneider, Matthew [mailto:Schneider.Matthew@epa.gov]
Sent: Thursday, July 19, 2018 12:54 PM
To: Wade Moore
Cc: Jeff Janik; Michael Christian; Matt Frondorf; Bustamante, Armando
Subject: Hwy 30 & Little Willow Programs - Additional information requested

Hi Wade,

I am sending you a flash drive via UPS today containing the videos we collected last week. The tracking number is 1ZA4201T0193617898.

I understand that it may take some time to provide some of the documents I am requesting. I would like a complete response by July 27. If more time is needed to compile certain documents, please provide me with everything you have compiled by July 27 and propose a date for fulfilling the remaining requests.

For Both Little Willow Road Gathering Station and NWGP HWY 30 Treating Facility:

Provide the dates of construction, reconstruction, or modification for all affected facilities (e.g. storage vessel affected facilities, well-affected facilities, compressor affected facilities, pneumatic controller affected facilities, etc.), and any physical or operational changes which may have increased the emission rate of any relevant pollutant.

For each affected facility or regulated process unit, storage vessel, compressor, pneumatic controller, well site, etc. provide which federal regulations apply (for example NSPS OOOO, OOOOa, VV, VVa, etc), or if none apply, and a narrative explanation for how this determination was made.

Provide the initial annual report and the most recent annual report as described in 40 cfr 60.5420(b)/60.5420a(b)

For each reciprocating compressor, provide the total number of hours of operation since the last compressor rod packing replacement. Provide a record of the most recent rod packing replacement

For each pneumatic controller, provide the records required in 40cfr part 60.5420(c)/60.5420a(c)

For the Little Willow Road Gathering Station:

Provide a written description of the site operations, for example, how many water and oil tanks are on site, describe the on-site well that is non-producing, how many separators, dehydrators, compressors, etc. and what pieces of equipment are vented to what control devices (combustor, vapor recovery unit, compressors, etc.)

If applicable (i.e. the site has facilities subject to NSPS OOOOa), as described in 40cfr 60.5397a(b), provide the final fugitive emissions monitoring plan.

Provide the most recent annual report described in 40cfr 60.5397a(j), which includes the information described in 60.5420a(b)(7)

Provide the certified assessment for the storage vessel closed vent system as described in 40 cfr 60.5411a(d)

Provide records of Method 22 observations of the combustor for the past 3 months

For the NWGP HWY 30 Treating Facility:

Provide a written description of the site operations, for example, how many water/oil/condensate/NGL tanks are on site, describe the on-site treatment and separation processes, how many separators, dehydrators, compressors, etc. and what pieces of equipment are vented to what control devices (flares, etc.)

Please describe the operation of the flare(s) located on site. For example, is it air-assisted or non-assisted? For the time period while EPA was onsite, (10:00am July 11, 2018 through 12:30pm July 11, 2018) please provide net heating value of the gas being sent to the flare, the hydrogen content, and exit velocity of the gas stream, as described in 40 CFR part 60.18.

Thank you,

Matthew Schneider
Chemical Engineer, Field Branch
US EPA NEIC
303-462-9292