Message

From: Schneider, Matthew [Schneider.Matthew@epa.gov]
Sent: 6/4/2018 4:53:35 PM
To: McClintock, Katie [McClintock.Katie@epa.gov]
CC: Williams, Christopher [Williams.Christopher@epa.gov]; Connell, Rebecca [Connell.Rebecca@epa.gov]; Bustamante, Armando [Bustamante.Armando@epa.gov]
Subject: Project Agreement for upcoming New Plymouth Idaho Oil and Gas inspections

Katie,
Included in this email is the draft project agreement for the upcoming Idaho oil and gas inspections. Please review and provide comments by June 15 if possible. Alternatively if you have no comments, this will become the final project agreement.

Ex. 5 Deliberative Process (DP) / Ex. 6 PII

I will be in the field next week but would like to set up a call with Region 10 and the contacts from the state of Idaho when I return. Be on the lookout for an email to the contact list proposing availability during the week of June 18. Thank you,

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

PROJECT AGREEMENT

PROJECT DESCRIPTION AND SCOPE OF WORK

U.S. Environmental Protection Agency (EPA) Region 10 (Region) requested EPA's National Enforcement Investigations Center (NEIC) to assist in conducting a focused Clean Air Act (CAA) compliance investigation of the Alta Mesa Holdings, LP (Alta Mesa) well site operations as well as the Northwest Gas Processing, LLC (NWGP) facility (time permitting) in the New Plymouth, Idaho geographical area.

The state of Idaho received complaints from the public that some of Alta Mesa's well sites may have switched into production mode without proper permitting. EPA's Air Enforcement Division (AED) provided background information related to each of the targeted facilities. According to facility operating permits for each individual site location, several of the sites are permitted as operating with storage tanks and other processing equipment; however, a review of aerial Google Earth imagery from within the past year showed that many of the identified sites have not yet been fully developed.

NEIC personnel will be joined by EPA Region 10 and the Idaho Department of Environmental Quality (IDEQ) in investigating Alta Mesa's and NWGP's (time permitting) operating status and compliance with potentially applicable environmental statutes at the following site locations:

Company	Facility Type	Site	Well Identification Number/Facility ID	Status	Construction Date	il Tanks and ontrols[1]	Regulatory Applicability
Alta Mesa	Gas Gathering	Little Willow	N/A	Active	Unknown, but a permit to construct additional equipment was issued in Feb. 2016	6 tanks @ 1000 barrels (bbl) each Vapor combustor control, 98% combustion efficiency (CE)	40 Code of Federal Regulations (CFR) Part 61 New Source Performance Standards (NSPS) Subpart OOOO (potentially OOOOa if modifications made after 9/18/15)
	Oil & Gas (O&G) Production	Kauffman 1-9	11-075-20027	Active	2014-11-8	0 @ 500 bbl ach 95% ontrol ssumed	NSPS OOOO (potentially OOOOa if modifications made after 9/18/15)
	O&G Production	ML Investments 1-3	11-075-20026	Active	2016-1-27	0 @ 500 bbl ach 5% control ssumed	NSPS OOOOa

[1] Based on permit information provided by EPA's Air Enforcement Division (AED).

	O&G Production	Kauffman 1-34	11-075-20024	Active	2015-7-14	0 @ 500 bbl ach 5% control ssumed	NSPS OOOO (potentially OOOOa if modifications made after 9/18/15)
	O&G Production	ML Investments 2-3	11-075-20029	Active	2016-1-25	0 @ 500 bbl ach 5% control ssumed	NSPS OOOOa
	O&G Production	ML Investments 1-11	11-075-20025	Active	2014-10-17	No permit identified; unknown	NSPS OOOO (potentially OOOOa if modifications made after 9/18/15)
	O&G Production	ML Investments 2-10	11-075-20022	Active	2014-3-26	No permit identified; unknown	NSPS OOOO (potentially OOOOa if modifications made after 9/18/15)
	O&G Production	ML Investments 3-10	11-075-20031	Inactive	2017-10-30	No permit identified; unknown	NSPS OOOOa
	O&G Production	DJS 1-15	11-075-20020	Inactive	2010-11-12	No permit identified; unknown	NSPS OOOO (potentially OOOOa if modifications made after 9/18/15)
	O&G Production	DJS 2-14	11-075-20023	Shut in	2014-9-17	No permit identified; unknown	NSPS OOOO (potentially OOOOa if modifications made after 9/18/15)
NWGP	Gas processing	Highway 30 Treating Facility	Facility ID 075-00021	Active	Unknown, but a permit to construct additional equipment was issued in Oct. 2017	10 condensate storage tanks Throughput approx. 1800 bbl/day Vapor recovery unit, CE listed as 98% 2 flares also located onsite	NSPS OOOO (potentially OOOOa if modifications made after 9/18/15)

[1] Based on information provided by EPA's Air Enforcement Division (AED).

NEIC personnel will also document activities and conditions that, although not specifically regulated, have impacted or could potentially impact the environment. Investigation activities will include the following:

- Conducting infrared (IR) camera surveys of the operating facilities following draft guidance provided by EPA's AED.
- Recording and documenting IR videos of any volatile organic compound (VOC) emissions observed.
- Photographing and/or otherwise documenting site conditions and process configurations, where applicable.
- Preparing a report summarizing NEIC inspection activities.

A photoionization detector (PID) may be used to additionally verify the non-methane VOC concentration of observed emissions. The PID will be calibrated and provided by EPA Region 10 personnel.

EPA Region 10 has asked that these inspections be conducted unannounced.

SUMMARY OF DELIVERABLES AND PROJECT TIMELINE

Milestones and Deliverables	Description (Roles and Responsibilities)	Responsible Party	Target Work/Completion Dates
Region comments on project agreement	Region will review project agreement and provide comments	EPA Region 10, Katie McClintock	June 15, 2018
Final project agreement	**Project manager (PM) will incorporate regional comments and deliver to Region via email**	**NEIC PM**	**June 22, 2018**
On-site inspection	Team arrives in Boise, Idaho, on 7/9/2018 and plans to depart on 7/13/2018	NEIC project team	July 13, 2018
Draft preliminary findings (if needed)	**Team meeting with the Region to provide draft preliminary findings via email or optional conference call**	**NEIC project team**	**July 31, 2018**
External draft report to Region	**NEIC draft report, provided to Region for review as an electronic copy through a shared link on EPA OneDrive**	**NEIC PM**	**August 24, 2018**
Region comments on external draft report	Region will review external draft report and provide comments	EPA Region 10	September 24, 2018
Final project report	**Final report, including supporting documentation, provided to Region as electronic copies through a shared link on EPA OneDrive.**	**NEIC PM**	**TBD, but planned for within 30 days of receiving Regional comments**

* NEIC deliverables are in **bold.**
* Region responsibilities are highlighted in blue.

RISK MANAGEMENT

The project timeline table above outlines completion dates for milestones and deliverables that are based on the following assumptions and constraints unique to this project. If any of the assumptions significantly change, this may affect the overall project timeline. The project timeline is considered tentative until the field inspection is completed. If any milestone or deliverable dates change after the final issuance of this project

plan, the PM will adjust the timeline in coordination with NEIC management and the customer and notify all applicable stakeholders of the changes via email.

Assumption/Constraints	Impact to Project's Budget, Timeline, or Staffing Needs if Assumption is Not Met or Constraint Occurs
CONSTRAINT: Weather may be a constraint	If inclement weather occurs, this could affect the project scope of work performed. Infrared camera surveys cannot be conducted in inclement weather conditions.
Assumption: The targeted facilities are stationed with workers authorized to grant access to production processes and the appropriate personnel are present to answer the EPA field team's questions.	Conducting unannounced inspections creates a risk of potential denial of entry if no one is working at the facility to grant access to production areas. Employees of the facility may not be knowledgeable about the regulatory requirements, or may not have the authority to interact with the EPA field team. Either of these scenarios may delay the EPA field team's ability to access the sites and/or gather the pertinent information related to compliance, which can prevent the project scope from being fully achieved.
ASSUMPTION: Records are readily available, and the team will receive copies of all requested documents prior to leaving the site	If all requested documents are not received, the report timeframe will need to be extended to account for the additional time needed for the facility to provide the appropriate records and for team members to review the documentation.

The above assumption must hold true in order for this project to meet agreed-upon objectives and/or deliverable deadlines.

CONTACT LIST

(Name/title/affiliation)	(Contact Information)	Role
Armando Bustamante/environmental engineer/NEIC	303-462-9262; bustamante.armando@epa.gov	CAA inspector
Matthew Schneider/chemical engineer/NEIC	303-462-9292; schneider.matthew@epa.gov	CAA inspector and project manager
Katie McClintock/unit manager/EPA Region 10	206-553-2143; mcclintock.katie@epa.gov	CAA Regional contact
Chris Williams/EPA Air Enforcement Division	202-564-7889; williams.chris@epa.gov	CAA headquarters contact
Steve Bacom/Compliance and Enforcement Coordinator/IDEQ	208-373-0590; steve.bacom@deq.idaho.gov	State of Idaho point of contact
Rebecca Connell/Civil Services Section Chief/NEIC	303-462-9253; connell.rebecca@epa.gov	NEIC supervisor