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ConocoPhillips
Alaska

CERTIFIED MAIL
7017-0660-0000-0430-1818

February 15, 2018

Alaska Department of Environmental Conservation
Mr. Jim Plosay
Air Permits Program Manager
410 Willoughby Avenue, Suite 303
Juneau, Alaska 99801-1795

RE: Alpine Central Processing Facility, Operating Permit No. AQ0489TVP02
Off-Permit Change Notification
NSPS Subpart OOOOa Applicability

Dear Mr. Plosay:

ConocoPhillips Alaska, Inc. (CPAI) is submitting this notification of an off-permit change pursuant to 40 CFR 71.6(a)(12)(ii) for the Alpine Central Processing Facility (Alpine CPF) stationary source located at the Alpine Oilfield, Alaska. The purpose of this notice is to formally notify the Department that NSPS Subpart OOOOa (Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015) has become applicable to this stationary source. The Alpine CPF operates under the approval of Air Quality Operating Permit No. AQ0489TVP02, issued by the Department on February 1, 2016.

Background and Description of Change

On February 15, 2017, the CD2 Drill Site became a "Collection of Fugitive Emissions Components at a Well Site" affected facility for the well site leak detection and repair (LDAR) requirements under 40 CFR 60.5365a(i). CPAI drilled a new well at the existing CD2 Drill Site thereby triggering the "modification" requirements pursuant to 40 CFR 60.5365a(i)(3)(i).

On April 13, 2017, the CD3 Drill Site also became an affected facility for the NSPS OOOOa well site LDAR requirements pursuant to 40 CFR 60.5365a(i)(3)(i).

On April 13, 2017, CPAI hydraulically fractured a new well (CD3-111A) thereby triggering the Well Completion Operation requirements in NSPS Subpart OOOOa for "well" affected facilities as described in 40 CFR 60.5365a(a).

Change in Emissions

Volatile Organic Compound (VOC) emissions are regulated by NSPS Subpart OOOOa. NSPS Subpart OOOOa creates standards that reduce fugitive VOC emissions. There has been no change in non-fugitive VOC emissions at the Alpine CPF as a result of NSPS Subpart OOOOa becoming applicable.

Requirements that Apply as a Result of the Change

NSPS OOOOa LDAR Requirements:

As a result of the Alpine CD2 and CD3 drill sites becoming "Collection of Fugitive Emissions at a Well Site" affected facilities, CPAI must comply with the well site LDAR requirements in 40 CFR 60.5397a, et seq (see 40 CFR 60.5397a(a) and 40 CFR 60.5410a(j)).

These requirements include:

- Develop a fugitive emissions monitoring plan;
- Complete an initial monitoring survey within 60 days after first day of production or startup of production, as applicable, or before June 3, 2017; whichever is later;
- Following initial monitoring surveys, conduct semi-annual routine monitoring surveys;
- Repair or replace fugitive emission components leaks no later than 30 calendar days after detection unless the fugitive emission component qualifies for Delay of Repair pursuant to 40 CFR 60.5397a(h)(2);
- Resurvey fugitive emission components no later than 30 days after repair or replacement to verify no fugitive emissions are present;
- Keep records of each monitoring survey and repair activities as specified in 40 CFR 60.5420a(c)(15); and
- Submit annual reports that include the information specified in 40 CFR 60.5420a(b)(1) and (7).

NSPS OOOOa Well Completion Operation Requirements:

CPAI must comply with the Well Completion Operation requirements in 40 CFR 60.5375a, et seq, 40 CFR 60.5410a(a), and 40 CFR 60.5415a(a) for "well" affected facilities. These requirements include:

- As applicable, submit the notification required in 40 CFR 5420a(a)(2);
- Utilize a separator once it is technically feasible for one to operate during the flowback following hydraulic fracture or refracture;
- Well completion operations conducted on or after 11/30/16 must perform reduced emission completions (REC) unless the well qualifies as a wildcat, delineation, or low pressure well. If it is technically infeasible to conduct REC or the well qualifies as a wildcat, delineation, or low pressure well, the recovered gas from the separation flowback stage must be routed to a completion combustion device (CCD) unless it may negatively impact the tundra, permafrost, or waterways. The CCD must be equipped with a reliable continuous pilot flame;
- Keep records as specified in 40 CFR 60.5420a(c)(1); and
- Submit annual reports that include the information specified in 40 CFR 60.5420a(b)(1) and (2).

Other requirements of NSPS Subpart OOOOa may also become applicable at a future time. CPAI will comply with the applicable provisions of NSPS Subpart OOOOa as summarized above and will comply with any additional provisions of the subpart as they become applicable to Alpine CPF[1]. CPAI will provide to the Department proposed permit language to address the applicable provisions of Subpart OOOOa at a later date.

Please contact me at (907) 265-6937 or by email at laura.perry@conocophillips.com should you have any questions regarding this notification or require any additional information.

Sincerely,

Laura K. Perry
Coordinator – Air Quality

cc: US EPA Region 10, Part 70 Operating Permit Program, M/S OAW-150, 1200 Sixth Avenue, Suite 900, Seattle, WA 98101

[1] As previously discussed with Jim Baumgartner and Moses Coss, CPAI does not intend to notify the Department when additional well sites and wells become affected facilities under NSPS Subpart OOOOa and are subject to the same requirements as those listed in this notification. However, CPAI will notify the Department again if/when a new category of affected facility with requirements that differ from those stated in this notification is triggered under Subpart OOOOa.

Certification Statement
[18 AAC 50.205]

Stationary Source Name(s): Alpine Central Processing Facility (CPF)
Off-Permit Change Notification
NSPS Subpart OOOOa Applicability

"Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete."

Misty Alexa
Responsible Company Official

9 February 2018
Date

Misty Alexa	Manager, WNS Operations	ConocoPhillips Alaska, Inc.
Printed Name	Title	Company