From: Klepp, Robert

Sent: Thursday, March 14, 2019 06:55 PM

To: Brooks, Phillip; Chapman, Apple; Fried, Gregory

CC: Hoyt, Daniel; Williams, Christopher

Subject: FW: 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

Phill, Apple and Greg,

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP) Counsel for Hilcorp is courtesy copied on the FOV and the information request, see below.

As sent versions of the docs are attached.

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 2:48 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

Robert G. Klepp, Attorney

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