From: Kaleri, Cynthia

Sent: Thursday, July 26, 2018 03:28 PM

To: Mia, Marcia; Hoyt, Daniel; Williams, Christopher

Subject: FW: Informal Information Request

Attachments: 20180501155159175.pdf

As just mentioned in my prior e-mail, for discussion in today's call.

Cynthia J. Kaleri

Enforcement Officer, EPA Region 6

Phone (214) 665-6772

Mailing Address

Attention: Cynthia J. Kaleri (6EN-AA)

United States Environmental Protection Agency

1445 Ross Avenue

Dallas, TX 75202-2733

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From: Kaleri, Cynthia

Sent: Thursday, May 31, 2018 8:12 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>; Hoyt, Daniel <Hoyt.Daniel@epa.gov>

Subject: FW: Informal Information Request

FYI

From: Kaleri, Cynthia

Sent: Tuesday, May 8, 2018 1:00 PM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Cc: Larson, Darrin <Larson.Darrin@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>

Subject: FW: Informal Information Request

Ex. 5 Deliberative Process (DP)

Cynthia J. Kaleri

Enforcement Officer, EPA Region 6

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From: Matt Henderson [mailto:mhenderson@hilcorp.com]

Sent: Thursday, May 3, 2018 10:05 AM

To: Kaleri, Cynthia <kaleri.cynthia@epa.gov>

Cc: Larson, Darrin <Larson.Darrin@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>

Subject: RE: Informal Information Request

Please see attached for answers to your questions below as well as documentation for compliance with OOOOa.

Let me know if you have further questions or need additional explanation.

Thanks,

Matt Henderson

Hilcorp Energy Company

713-289-2970 (Office)

512-983-2098 (Mobile)

From: Kaleri, Cynthia [mailto:kaleri.cynthia@epa.gov]

Sent: Friday, April 20, 2018 7:34 AM

To: Matt Henderson <mhenderson@hilcorp.com>

Cc: Larson, Darrin <Larson.Darrin@epa.gov>; Thompson, Steve <thompson.steve@epa.gov>

Subject: Informal Information Request

Hello Matt,

We need to ask for a little more information than what you have already provided by e-mail concerning Hilcorp's recent well redevelopments in the northwestern New Mexico area. We appreciate you providing that information requested in identifying specific wells being redeveloped in the area. I have pulled public information available from New Mexico's Oil Conservation Division (OCD) and the U.S. Bureau of Land Management (BLM) for each of the wells identified. However, no federal records specific to NSPS Subpart OOOOa have yet been submitted since the recompletions were only recently finished. By the way, you can find detailed information for NSPS Subpart OOOOa requirements here: https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/implementation-oil-and-natural-gas-air#well

I've attached one of the standard templates developed for entering required reporting information into EPA's Compliance and Emissions Data Reporting Interface (CEDRI), as required under this rule, for the 1st reporting period (since ya'll are new owners/operators for the sites acquired just last year). For now, we are mainly interested in the well redevelopments already identified, so please provide the detailed information required on the second and third tabs of the attached spreadsheet (Site Info & Well Info tabs) for our preliminary review. If Hilcorp would prefer a formal information request, please just let me know, but that process is typically more resource intensive - note that we aren't asking for information not already required for the 1st reporting period at this time, and only a very limited subset of all data to be reported by Hilcorp in the future for all affected facilities under the rule. However, for clarification purposes, we would also ask that you note and include the following detailed information for each well redevelopment in your response:

1. Please characterize the use of Nitrogen in each well completion - describe Hilcorp's general protocol for injecting nitrogen during well completions and if possible, please provide a percent estimate of the amount of nitrogen typically used in relation to natural gases captured during the separator flowback stage of well redevelopment. For each well redeveloped, please provide the specific amount of nitrogen used during each completion including the maximum rate injected during well redevelopment and the total amount injected during the entire initial and separator flowback stages (entire completion activity prior to production).

2. At each well, if initial flowback was followed immediately by production (i.e., no separator flowback occurred), please provide the production records for the transitional time from just prior to the end of initial flowback through initial production (i.e., info should be inclusive of metered increase at gas line and liquids flow to onsite tanks, etc.). If separator flowback occurred prior to production, please just provide the production records for the transitional time from the beginning of separator flowback through production. Note that times for each stage are requested by separate columns on the spreadsheet template provided, but actual production records are also being requested to supplement the spreadsheet.

3. According to OCD/BLM records entitled "Gas Capture Plans" that are available for each well, it looks like venting and flaring were allowed, as opposed to specific REC requirements under NSPS Subpart OOOOa - please explain the difference in what these plans indicate and what actions were actually taken at each well, specific to the well redevelopments for compliance with NSPS Subpart OOOOa (e.g., response should include descriptions of activities such as "venting only occurred during initial flowback at Well 'name'... ").

If you have any questions, please don't hesitate to call me at the number below.
Thanks,

Cynthia J. Kaleri

Enforcement Officer, EPA Region 6

Phone (214) 665-6772

Mailing Address

Attention: Cynthia J. Kaleri (6EN-AA)

United States Environmental Protection Agency

1445 Ross Avenue

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Hilcorp Energy Company's address is 1111 Travis St, Houston, TX 77002