Various locations
Natalia Vasquez

ARSENAL RESOURCES

People Powered. Asset Strong.

NSPS OOOOa

October 31, 2018

USEPA – Region III, Air Protection Division
Office of Air Enforcement & Compliance Assistance - NSPS
1650 Arch Street (3AP000)
Philadelphia, PA 19103-2029

RE: Annual Compliance Report – Compliance Period: August 2, 2017 – August 1, 2018
New Source Performance Standard Subpart OOOOa
Arsenal Resources LLC

To Whom It May Concern:

Arsenal Resources LLC (Arsenal) submits this letter and attachments to meet the annual reporting requirements for New Source Performance Standard (NSPS) Subpart OOOOa (40 CFR §60.5420a) for affected facilities constructed, reconstructed, or modified after September 18, 2015.

The attachments contain required information for the affected facilities operated by Arsenal during the initial compliance period for NSPS Subpart OOOOa (August 2, 2017 through August 1, 2018). In accordance with the rule, this report is being submitted no later than 90 days after the end of the initial compliance period (October 31st). The reporting requirements are summarized as follows:

- §60.5420a(b)(1): The general information specified in paragraphs (b)(1)(i) through (iv) of this section.
  Included in Attached Excel file.

- §60.5420a(b)(2): For each gas well affected facility, the information in paragraphs (b)(2)(i) through (iii) of this section.
  Included in attached Excel File.

- §60.5420a(b)(3): For each centrifugal compressor affected facility, the information specified in paragraphs (b)(3)(i) through (iv) of this section.
  Arsenal does not operate any centrifugal compressor affected facilities as identified in §60.5365a(b).

- §60.5420a(b)(4): For each reciprocating compressor affected facility, the information specified in paragraphs (b)(4)(i) and (ii) of this section.

Included in attached Excel file.

- §60.5420a(b)(5): For each pneumatic controller affected facility, the information specified in paragraphs (b)(5)(i) through (iii) of this section.
  Arsenal does not operate any pneumatic controller affected facilities as identified in §60.5365(d). It should be known that Arsenal does operate pneumatic controllers installed after September 18, 2015, but these devices are intermittent and/or low-bleed devices. As such, they are not considered pneumatic controller affected facilities as defined under NSPS Subpart OOOOa.

- §60.5420a(b)(6): For each storage vessel affected facility, the information in paragraphs (b)(6)(i) through (vii) of this section.
  Arsenal does not operate any storage vessel affected facilities as identified in §60.5365a(e). It should be known that Arsenal does operate storage vessels with the potential for VOC emissions that were installed after September 15, 2015. However, the VOC emissions from these storage vessels are less than 6 tons per year which accounting for enforceable limitations, they are not storage vessel affected facilities as defined under NSPS Subpart OOOOa.

- §60.5420a(b)(7): For the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor station within the company-defined area, the records of each monitoring survey including the information specified in paragraphs (b)(7)(i) through (xii) of this section.
  Included in attached Excel file.

- §60.5420a(b)(8): For each pneumatic pump affected facility, the information specified in paragraphs (b)(8)(i) through (iii).
  Arsenal does not operate any pneumatic pump affected facilities as identified in §60.5365a(h).

Please feel free to contact me at 724-940-1118, if there are questions regarding the information in this Initial Annual Report.

Sincerely,
Arsenal Resources LLC

Stacey Lucas
Vice President of Health, Safety and Environmental

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