

Stakeholder Meeting
Rule Language Development for Selected
Oil & Gas and VOC Stationary Source Control Strategies
Regional Air Quality Council | Junior Achievement Board Room, 2nd Floor
1445 Market Street | Denver, 80202
Tuesday, May 28, 2008 | 8:30 a.m. to Noon

Comments Discussion

- Comments received
 - Rocky Mountain Clean Air Action
 - Anadarko Petroleum and Noble Energy
 - Whiting Petroleum
 - Renegade Oil & Gas
 - EPA Region 8
- General comments
 - Short turn around
 - Planning on providing additional comments
- General responses
 - Appreciate any and all comments
 - Short turn around
 - Working to respond &/or incorporate comments received
 - Need time to fully respond, especially for detailed info or info where additional info is being requested
 - Some comments received were outside of meeting scope – will address later in process
- Process to respond to comments
 - Today:
 - Comment highlights
 - Briefly discuss comments received for which Division is seeking additional information
 - Next steps
 - Work in progress: post comments and developed responses prior to 6/11/08 meeting
 - Walk thru highlights at 6/11/08 meeting
 - Responses
 - Pending responses – need additional info
 - Responses still being developed

Comments that the Division is still considering but requests additional info

CONDENSATE TANKS:

- **90 day control requirement applies to 1 tpy sources**

Request:

- Please submit information on the number of new or modified sources between the 1 and 2 tpy (projected)

- **True minor sources comply with rolling-12 month total recordkeeping differs from Division policy**

Request:

- Please submit cost estimates on generating rolling-12 month total recordkeeping

- **95% vs. 98% control efficiency**

Request:

- Please submit information on ability of VRU's to meet the 98% control efficiency
- Please submit information on actual VRU downtime

- **Requirement to install flares conflicts with Governor's Climate Action Plan**

Request:

- Please submit estimates on the amount of CO₂e generated per flare and per VRU

- **Requirement to install/operate auto-igniters and continuous monitoring surveillance**

Request:

- Please submit cost estimates per auto-igniter and continuous monitoring surveillance system, along with estimates on the numbers of each companies would have to install

- **Refracing/stimulation triggers modification**

Request:

- Please submit cost estimate of conducting RACT analysis and submitting corresponding permit application

EXEMPTIONS:

- **Data supporting exemption changes**

Request:

- Please submit information on actual emissions from any source category in question
 - Drill rigs
 - Heater treaters
 - Separators

- Reboilers
- Others

REG 3/7 RACT FIX-UP:

- **Don't rely upon Federal Register posting to trigger permit application submittal date**

Request:

- Please comment on which event should trigger permit application clock – designation of non-attainment?