

AIR MECT\_102583507-409395\_  
RP\_20141021\_Reports\_P3302

**10/09/2014 ----- EBTP IMS- PROJECT RECORD -----**

PROJECT#: 409395  
RECEIVED: 09/15/2014

STATUS: P  
PROJTYPE: BRPT

DISP CODE: C ✓  
ISSUED DT:  
SUP-DISP DATE: 10/9/14

**STAFF ASSIGNED TO PROJECT:**  
THOMAS, JOSEPH

**PROJECT NOTES:**

JOE REQUESTED ECT-1 FOR THIS SITE ON 9/10/2014.  
PROJECT HOLD TO GET INFO ON STATUS OF UNREPORTED ENGINES AND HOW LOA IS MONITORED.

**PROJECT TRANSACTIONS****COMPANY DATA**

COMPANY NAME: DAVIS PETROLEUM PIPELINE LLC  
CUSTOMER REGISTRY ID: CN603143389

**PORTFOLIO DATA**

NUMBER: P3302 NAME: UMBRELLA POINT FACILITY - RN102583507

**SITE DATA**

ACCOUNT:  
CI0174W

REG ENTITY ID: RN102583507

SITE NAME: UMBRELLA POINT FACILITY

COUNTY: CHAMBERS

NEAREST CITY: BAYTOWN

LOCATION: FROM THE INTERSECTION OF FM 3180 AND I-10, TRAVEL SOUTH ON FM 3180 FOR 4 MILES TO MERGE WITH FM 2354. CONTINUE 7.5 MI TO BEACH CITY. FACILITY IS ON RIGHT.

**CONTACT DATA**

NAME: BRITTANY BRUMLEY

TITLE: ENVIRONMENTAL CONSULTANT

STREET: 911 REGIONAL PARK DRIVE CITY/STATE, ZIP: HOUSTON, TX , 77060-0

PHONE: 281-872-9300 ext 0

Email: bbrumley@ntceg.com

NAME: GREG SCHNEIDER

TITLE: MANAGER

STREET: 1330 POST OAK BLVD SUITE 600 CITY/STATE, ZIP: HOUSTON, TX , 77056-0

PHONE: 713-626-7766 ext 0

Email: gschneider@davcos.com

**TRANSACTION DATA**

TRANSACTION TYPE: CAP\_RPT  
EFFECTIVE YEAR: 2013

POLUTANT : NOX  
TON: 0.2

Allowance Type	Total
ACTUAL	0.2

TRANSACTION TYPE: CAP\_VINT

POLUTANT : NOX

TRANSACTION TYPE: CAP\_VINT  
EFFECTIVE YEAR: 2013

POLUTANT : NOX  
TON: 0

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**TRACKING ACTIVITES**

PM RECEIVED DATE : 09/24/2014 PROJECT HOLD : 09/25/2014 10/02/2014 LETTER ISSUED :

P3302

**Actual Allowances for NOX**

Balance/Year 2010	2011	2012	2013	2014	2015	2016
Current	0	0	0	0	0	0
Balance						

**Vintage Balances for NOX**

Balance/Year 2010	2011	2012	2013	2014	2015	2016
Current	0.20	0.90	0.20	0.80	0	0
Balance						

**Allowable Allowances for NOX**

Balance/Year	2010	2011	2012	2013	2014	2015	2016
Available Allowance for LEAN-BURN ENGINE - 145HP-757 (REMOVED BY LATE 2006)	0	0	0	0	0	0	0

**Flex permits Allowances for NOX**

Balance/Year	2010	2011	2012	2013	2014	2015	2016
Current Balance	0	0	0	0	0	0	0

**Pending Projects**

Proj_num	Xaction Type
----------	--------------

**Pseudocally Closed Projects**

Proj_num	Xaction Type
409395	CAP_VINT
409395	CAP_RPT

**MASS EMISSIONS CAP AND TRADE PROGRAM (MECT) PROGRAM  
ACTIVITY REPORT CERTIFICATION & TECHNICAL REVIEW**

Project No.:	409395	Project Type:	BRPT
Customer Reference No.:	CN603143389	Company:	Davis Petroleum Pipeline, LLC
Regulated Entity Reference No.:	RN102583507	Site Name:	Umbrella Point Facility
City:	Baytown	County:	Chambers
Project Manager:	Mr. Joseph Thomas	Portfolio Number:	P3302

**ANNUAL REPORT OVERVIEW**

Davis Petroleum Pipeline, LLC, submitted an Annual Compliance Report (Form ECT-1), received September 15, 2014, for the Umbrella Point Facility for the 2013 control period. The form was received after the reporting deadline (March 31, 2014). Updated information was provided via e-mail by the company's consultants on September 26, October 8, and October 9, 2014. The company reported a total of 0.2 ton of nitrogen oxides (NO<sub>x</sub>) emissions from one engine, Facility Identification Number (FIN) ENG-3, which was removed from the site during the 2013 control period.

Except for the Form ECT-1 being late, Davis Petroleum Pipeline, LLC, has satisfied the reporting requirements of 30 Texas Administrative Code (TAC) §101.359. The Umbrella Point Facility has sufficient allowances in its compliance account to cover its emissions and is in compliance with the MECT program for the 2013 control period.

**SITE OVERVIEW**

**Level of Activity:**

What is the basis of the reported level of activity, and has there been any change included in this annual report? Is there any deviation from the monitoring requirements of 30 TAC Chapter 117?

The level of activity was based on fuel use by the engine, but the fuel use was apparently not monitored in accordance with Chapter 117 requirements. There was no totalizing fuel flow meter installed on the engine or alternative monitoring used as prescribed by Chapter 117. Instead, the fuel flow to the offshore production platform was monitored in total, and the average fuel use before the engine was installed was subtracted to give the estimated fuel use for the engine. Although the monitoring does not appear to meet Chapter 117 requirements, no potential deviation is noted because the engine was removed in May 2013.

**Emission Factors:**

What is the basis of the reported emission factors, and has there been any change included in this annual report? Is there any deviation from the testing requirements of 30 TAC Chapter 117?

The emission factor for FIN ENG-3 was the same as was reported for the 2012 control period. Per the company's consultant, the factor was determined by quarterly emission testing conducting on December 6, 2012. Because a stack test was not conducted, a potential deviation was reported to the company and Region 12 for the 2012 report. A potential deviation is not being reported this year because the engine was removed in May 2013.

**New Facilities:**

No new facilities were reported.

**Shutdown Facilities:**

FIN ENG-3 was removed from the site in 2013. The company confirmed that both other engines previously at the site (FINs ENG-1 and ENG-2) were removed in March 2012.

**Existing Facilities Receiving Allowable Allowances:**

Are there any facilities receiving allowable or flexible allowances at this site? If yes, have the facilities completed their five full years of operation? If yes, has the company submitted a revised Form ECT-3, Level of Activity Certification?

There are no facilities receiving allowable or flexible allowances at this site.

**Allowance Transfers:**

Project Number	Received Date	Transaction	Trade Type	Amount (tons)	Traded to/from
94639	12/27/2002	Buy	Stream	2.7	RN100220664
98197	5/22/2003	Sell	Stream	2.7	RN100220664
408646	1/30/2014	Buy	Vintage	1.0	BKR1021

**Compliance:**

Were the allowances in the site's compliance account greater than or equal to the site's actual emissions for this control period?

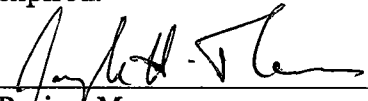
Yes. The Umbrella Point Facility is in compliance for the 2013 control period.

**ALLOWANCE SUMMARY**


Allocation	Transfers	Vintage	Transfers (Vint)	Actual Emissions	Balance
0.0	+2.7; -2.7	0.0	+1.0;-0.0	0.2	0.0

**CONCLUSION**

Although the Form ECT-1 was received late, Davis Petroleum Pipeline, LLC, has satisfied the annual reporting requirements of 30 TAC §101.359, and the Umbrella Point Facility is in compliance with the MECT program for the 2013 control period. No excess allowances remain to be forwarded to the 2014 control period for use as 2013 vintage allowances. Unused 2012 vintage allowances of 0.8 ton are now expired.

  
Project Manager      10/21/2014  
Date

  
Peer Reviewer      10/21/14  
Date

  
Work Lead      10/22/14  
Date

Received

SEP 15 2014

409395  
✓ T  
P3302Texas Commission on Environmental Quality  
MECT Annual Compliance Report (Form E-1)

Air Quality Division

## Company Information

Company Name: Davis Petroleum Pipeline, LLC ✓

Customer Reference Number: CN603143389 ✓

Company Contact Name: Greg Schneider

Title: Vice President

Mailing Address: 1330 Post Oak Blvd., Suite 600

City: Houston

State: TX

ZIP Code: 77056

Telephone: 713-626-7766

E-Mail: gschneider@davcos.com

## Site Information

Site Name: Umbrella Point Facility ✓

Street Address: At the intersection of FM 1405 and Hwy 99 in Baytown, travel south on FM 1405 for 4.0 miles. Turn southeast on FM 2354 and travel 2.3 miles to site.

City: Beach City

County: Chambers

ZIP Code: 77520

Regulated Entity Reference Number: RN102583507 ✓

Air Account Number (if applicable): CI-0174-W ✓

Portfolio Number: P3302

## Technical Contact Information

Technical Contact Name: Brittany Brumley

Title: Environmental Consultant

Mailing Address: 911 Regional Park Drive

City: Houston

State: TX

ZIP Code: 77060

Telephone: 281-872-9300

E-Mail: bbrumley@ntceg.com

**Texas Commission on Environmental Quality  
MECT Annual Compliance Report (Form ECT-1)**

**Annual Facility Emissions**

Offset	EPN	FIN	FIN Name	Level of Activity	Level of Activity Monitoring Protocol	Emission Factor	Emission Factor Monitoring or Testing Protocol	Annual Emissions (tons)
<input type="checkbox"/>	ENG-3	ENG-3	Compressor Engine	677040 hp-hr/yr	117.2035(a)(2)(G) <i>101.358(b) P&amp;C 10/8/2014</i>	0.263 g/hp-hr	117.2035(e)	0.20
<input type="checkbox"/>				Select Units	Select Protocol <i>EMAIL</i>	Select Units	Select Protocol	
<input type="checkbox"/>				Select Units	Select Protocol	Select Units	Select Protocol	
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<input type="checkbox"/>				Select Units	Select Protocol	Select Units	Select Protocol	

**Texas Commission on Environmental Quality  
MECT Annual Compliance Report (Form ECT-1)**

**Facility Status Update**

EPN	FIN	FIN Name	Facility Type	Authorization	Facility Status	Effective Date
ENG-3	ENG-3	Compressor Engine	IC Engine	PBR Registration No. 34968	Removed	05/01/2013
			Select Type		Select Status	
			Select Type		Select Status	
			Select Type		Select Status	
			Select Type		Select Status	
			Select Type		Select Status	
			Select Type		Select Status	
			Select Type		Select Status	
			Select Type		Select Status	
			Select Type		Select Status	



**Texas Commission on Environmental Quality  
MECT Annual Compliance Report (Form ECT-1)**

**Trade Summary**

Trade Type	Allowances Transferred In	Allowances Transferred Out
Current		
Future		
Stream		
Vintage	1.0	

**Summary of Allowances Used for Offset Requirements**

ECT-40 Submitted	<input type="checkbox"/>
Total Allowances for 1:1 Offset	
Total Emissions from Facilities Using Allowances for 1:1 Offset	

**Account Summary**

Control Period	2013
Control Period Balance	0.0
Greater of the Total Allowances for 1:1 Offset or Total Emissions from Facilities Using Allowances for 1:1 Offset	0.0
Total Emissions from All Other Facilities	0.2
Subtotal	0.2
Vintage Allowances Used	0.2
Remaining Account Balance	0.0

**Authorized Signature**

The signature below confirms my authorization to make this submission on behalf of the owners and operators of the facility or facilities included in this application. I certify that I have knowledge of the facts in this application and attachments and that these facts are true, accurate, and complete to the best of my knowledge and belief. I further state that I have read and understand Texas Water Code (TWC) §§7.177-7.183, which define criminal offenses for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and TWC §7.187, pertaining to criminal penalties.

Name: Greg Schneider

Title: Vice President

Original Signature Required

*GS*

Date 9-11-14

**OWNER/OPERATOR:**

DAVIS PETROLEUM PIPELINE, LLC

**FACILITY:**

UMBRELLA POINT FACILITY

**LOCATION:**

CHAMBERS COUNTY, TEXAS

**2013 ANNUAL COMPLIANCE REPORT**

**CALCULATION METHOD:**

$(G/HP-HR) (HP) (1 \text{ LB}/453.6 \text{ G}) (1 \text{ TN}/2000 \text{ LB}) (HR/YR) = \text{TN/YR}$

**EMISSIONS:**

EMISSION SOURCE	FIN	RATING HP	EMISSION RATE	RUNTIME HR/YR	EMISSIONS	
			G/HP-HR*		LB/DAY	TN/YR
COMPRESSOR ENGINE - CAT G3508NA	ENG-3	260	0.263	2604	3.62	0.20

\*SEE STACK TEST DATA ATTACHED

# Exterran

## GENERAL EMISSIONS TEST FORM

DATE OF TEST: 12/6/2012  
TIME OF TEST: 12:03:02

Quarter: 4

AREA: Chambers County

FACILITY: Umbrella Point

AIR PERMIT #:  
PERMIT DATE:

PERMIT EQUIP #:

EQUIPMENT: 4416  
MODEL: Cat G3508NA  
SERVICE: Compression

UNIT#: Davis Petroleum  
SERIAL NUMBER: 2JF00125

SITE RATED HP: 315  
INTAKE PRESS: 8 Vac  
RPM: 900  
Fuel: Natural Gas  
FUEL FLOW: 1000.000 scf/hr

HP DURING TEST: 260  
INTAKE TEMP: 110  
IGNITION TIMING: 30  
SPECIFIC GRAVITY:

AIR/FUEL CONTROLLER  
MAKE: Altronic

MODEL: EPC-100

CATALYTIC CONVERTER  
MAKE: GT

MODEL: GT201V3-2-1-4108

STACK HEIGHT: 25 FT 0 IN  
STACK FLOW:

SENSOR TEMP: 83.3 F  
STACK TEMP:

### PERMITTED LIMITS:

CO: 3.00 g/bhp-hr CO emissions are below permitted limits.:)  
NOx: 0.50 g/bhp-hr NOx emissions are below permitted limits.:)

### CALCULATED EMISSIONS FROM TEST:

CO: 0.320 g/bhp-hr 0.804 TPY  
NOx: 0.263 g/bhp-hr 0.661 TPY

Post Test Calibration adjustments have been applied.

Technician: Craig Enderle Exterran

## PRE-POST TEST CALIBRATION INFORMATION

DATE OF TEST: 12/6/2012  
TIME OF TEST: 13:53:16

Quarter: 4

AREA: Chambers County

FACILITY: Umbrella Point

AIR PERMIT #:  
PERMIT DATE:

PERMIT EQUIP #:

EQUIPMENT: 4416  
MODEL: Cat G3508NA

UNIT#: Davis Petroleum  
SERIAL NUMBER: 2JF00125

ANALYZER MAKE: ECOM  
ANALYZER S/N: 2848

ANALYZER MODEL: J2K(N)

PRE TEST PERFORMED: 12/6/2012 11:59:43  
POST TEST PERFORMED: 12/6/2012 15:12:12

SAMPLE FLOW RATE: 5.0 l/min  
RESPONSE TIME: 2:00

RAMP-UP TIME: 10:00  
RAMP-UP TIME OK: YES

MAX O2 ZERO ERROR: 0.3 % O2  
MAX CO NO NO2 ZERO ERROR: 3.0 % SPAN  
MAX ZERO DRIFT: 5.0 % SPAN  
MAX O2 CAL ERROR: 0.5 % O2  
MAX CO NO NO2 CAL ERROR: 5.0 % SPAN  
MAX SPAN DRIFT: 5.0 % SPAN

### PRE TEST CALIBRATION DATA

	MAX ZERO	ZERO OK	RESP	CAL ERROR	CAL OK
NO	0	2.5 YES		83	0.00% YES
NO2	0	2.8 YES		93	0.00% YES
CO	0	30 YES		1001	0.00% YES
O2	0	0.3 YES		20.9	0.0 % O2 YES

### POST TEST CALIBRATION DATA

	MAX ZERO	ZERO OK	ZERO DRIFT	ZERO DRIFT OK	RESP	CAL ERROR	CAL OK	SPAN DRIFT	SPAN DRIFT OK	CAL GAS VALUE	CAL GAS EXP DATE
NO	0	2.5 YES		0.00% YES		81	2.40% YES	-2.40% YES		83	1/16/2014



**Texas Commission on Environmental Quality**  
**Application for Transfer of Allowances**  
**Form ECT-2 (Page 1)**

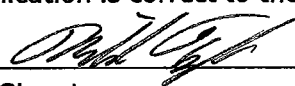

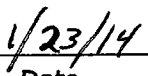
Receiver  
**COPY**  
8 SEP 15 2014

<b>Seller's Company Information</b>			<b>Air Quality Division</b>
Company Name: Element Markets, LLC			
Mailing Address: 3555 Timmons Lane, Suite 900			
City: Houston	State: TX	ZIP Code: 77027	
Telephone Number: 281-207-7200			
TCEQ Customer Reference Number (CN): BKR1021			
<b>Seller's Site Information</b>			
Site Name: N/A			
Street Address:			
Nearest City:	County:	ZIP Code :	
TCEQ Regulated Entity Reference Number (RN):			
TCEQ Air Account Number (if applicable): BKR1021			
Portfolio Number: P3195			
<b>Seller's Technical Contact Information</b>			
(Mr. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr. <input type="checkbox"/> ) Technical Contact Name: Michael Taylor			
Title: Senior Vice President			
Mailing Address: 3555 Timmons Lane, Suite 900			
City: Houston	State: TX	ZIP Code: 77027	
Telephone Number: 281-207-7200	E-Mail Address: contractadmin@elementmarkets.com		
<b>Seller's Contact Information</b>			
(Mr. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr. <input type="checkbox"/> ) Company Contact Name: Same As Technical Contact Information			
Title:			
Mailing Address:			
City:	State:	ZIP Code:	
Telephone Number:	E-Mail Address:		
<b>Buyer's Company Information</b>			
Company Name: Davis Petroleum Pipeline, LLC			
Mailing Address: 1330 Post Oak Boulevard, Suite 600			
City: Houston	State: TX	ZIP Code: 77056	
Telephone Number: 713-439-6757			
TCEQ Customer Reference Number (CN): 603143389			



**Texas Commission on Environmental Quality**  
**Application for Transfer of Allowances**  
**Form ECT-2 (Page 2)**

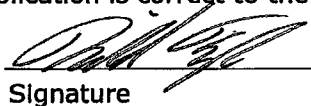
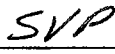
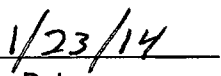
**COPY**

<b>Buyer's Site Information</b>				
Site Name: UMBRELLA POINT FACILITY				
Street Address:				
Nearest City: Baytown		County: Chambers		ZIP Code: 77520
TCEQ Regulated Entity Reference Number (RN): 102583507				
TCEQ Air Account Number (if applicable):				
Portfolio Number: P3302				
<b>Buyer's Technical Contact Information</b>				
(Mr. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr. <input type="checkbox"/> ) Technical Contact Name: Greg Schneider				
Title:				
Mailing Address: 1330 Post Oak Boulevard, Suite 600				
City: Houston		State: TX		ZIP Code: 77056
Telephone Number: 713-439-6757			E-Mail Address: gschneider@davcos.com	
<b>Buyer's Contact Information</b>				
(Mr. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr. <input type="checkbox"/> ) Company Contact Name: Same As Technical Contact Information				
Title:				
Mailing Address:				
City:		State:		ZIP Code:
Telephone Number:		E-Mail Address:		
<b>Allowances to be Transferred</b>				
Seller's Portfolio Number: P3195			Buyer's Portfolio Number: P3302	
<b>Pollutant</b>	<b>Allocation Year</b>	<b>For Use in Control Period</b>	<b>Amount Traded (tons)</b>	<b>Purchase Price (\$/ton)</b>
NOX	2012	2013	1.0	300.00
<b>Authorized Signature</b>				
I, <b>Michael Taylor</b> , hereby certify that <b>Element Markets, LLC</b> is the owner of the above listed allowances, these allowances may be transferred to the listed buyer, and that information entered in this application is correct to the best of my knowledge and belief.				
 Signature		 Title		 Date



**Texas Commission on Environmental Quality**  
**Application for Transfer of Allowances**  
**Form ECT-2 (Page 2)**

**COPY**

<b>Buyer's Site Information</b>				
Site Name: Shore Acres Production Facility				
Street Address: HIGHWAY 146, LA PORTE TX 77571				
Nearest City: South Acres		County: Harris		ZIP Code: 77571
TCEQ Regulated Entity Reference Number (RN): 100211739				
TCEQ Air Account Number (If applicable):				
Portfolio Number: P3303				
<b>Buyer's Technical Contact Information</b>				
(Mr. <input checked="" type="checkbox"/> Ms. <input type="checkbox"/> Dr. <input type="checkbox"/> ) Technical Contact Name: Greg Schneider				
Title:				
Mailing Address: 1330 Post Oak Boulevard, Suite 600				
City: Houston		State: TX		ZIP Code: 77056
Telephone Number: 713-439-6757			E-Mail Address: gschneider@davcos.com	
<b>Buyer's Contact Information</b>				
(Mr. <input type="checkbox"/> Ms. <input type="checkbox"/> Dr. <input type="checkbox"/> ) Company Contact Name: Same As Technical Contact Information				
Title:				
Mailing Address:				
City:		State:		ZIP Code:
Telephone Number:		E-Mail Address:		
<b>Allowances to be Transferred</b>				
Seller's Portfolio Number: P3195			Buyer's Portfolio Number: P3303	
<b>Pollutant</b>	<b>Allocation Year</b>	<b>For Use in Control Period</b>	<b>Amount Traded (tons)</b>	<b>Purchase Price (\$/ton)</b>
NOX	2012	2013	1.0	300.00
<b>Authorized Signature</b>				
I, <b>Michael Taylor</b> , hereby certify that <b>Element Markets, LLC</b> is the owner of the above listed allowances, these allowances may be transferred to the listed buyer, and that information entered in this application is correct to the best of my knowledge and belief.				
 Signature		 Title		 Date



February 19, 2014

Mr. Brandon Greulich  
Texas Commission Environmental Quality (TCEQ)  
Office of Permitting and Registration  
Emission Banking and Trading Program, MC-206  
P.O. Box 13087  
Austin, TX 78711-3087

Re: 2013 Annual Emissions Report  
Davis Petroleum Pipeline, LLC (CN603143389)  
Umbrella Point Facility (RN102583507)  
Chambers County, Texas

Mr. Greulich:

In accordance with 30 TAC §101.359, Davis Petroleum Pipeline, LLC (Davis) is submitting the 2013 Annual Compliance Report for the Umbrella Point Facility in Chambers County, Texas. The ECT-1 Form (TCEQ Form 10384) and supporting documentation is included in the attached report. The Application for Transfer of Allowances (i.e. TCEQ Form ECT-2) was submitted to the TCEQ on January 29, 2014 by Element Markets, LLC. A copy of the application is also attached.

The engine subject to 30 TAC §101.351 was removed from the site on May 1, 2013. Additionally, the facility was sold to Linc Energy Operations, Inc. with an effective date of July 1, 2013. Therefore, emissions reported by Davis are only for the January 1, 2013 – July 1, 2013 time period.

If you have any questions or need further information to process the report, please call me at 281-872-9300 or email me at [bbrumley@ntceg.com](mailto:bbrumley@ntceg.com). All written correspondence should be sent to:

Davis Petroleum Pipeline, LLC  
1330 Post Oak Blvd., Suite 600  
Houston, Texas 77056  
Attention: Greg Schneider

Sincerely,

Brittany Brumley  
Attachments

## Hubackova, Katerina

---

**From:** Hubackova, Katerina  
**Sent:** Thursday, September 11, 2014 2:44 PM  
**To:** 'Joe Thomas'; Schneider, Greg  
**Cc:** Brandon Greulich; Kari Lazo (KLazo@ntglobal.com)  
**Subject:** RE: REMINDER: Submit Form ECT-1  
**Attachments:** DAVIS - UMBRELLA PT - 2013 MECT COMPLIANCE REPORT.PDF; DAVIS - SHORE ACRES - 2013 MECT COMPLIANCE REPORT.PDF

☐ Mr. Thomas-

Please see attached ECT-1 forms for the following sites:

Site Name	RN	Company Name	CN	Portfolio
UMBRELLA POINT FACILITY	RN102583507	DAVIS PETROLEUM PIPELINE, LLC	CN603143389	P3302
SHORE ACRES PRODUCTION FACILITY	RN100211739	DAVIS PETROLEUM PIPELINE, LLC	CN603143389	P3303

The originals will be mailed to:

Texas Commission on Environmental Quality  
Emissions Banking and Trading Program (MC-206)  
P.O. Box 13087  
Austin, TX 78711-3087

☐ Please let us know if anything else is needed to resolve this issue.

Thank you,

Kate Hubackova  
**DAVIS PETROLEUM CORP.**  
1330 Post Oak Blvd., Suite 600  
Houston, TX 77056  
Direct ph: 713-439-6772  
Cell: 832-794-1182  
Fax:713-439-6761



**From:** Joe Thomas [mailto:joe.thomas@tceq.texas.gov]  
**Sent:** Wednesday, September 10, 2014 3:48 PM  
**To:** Schneider, Greg  
**Cc:** Brandon Greulich; lhudson@ntceg.com; Hubackova, Katerina  
**Subject:** RE: REMINDER: Submit Form ECT-1

Mr. Schneider,

The e-mail address I used for Lacy may not be correct. I received back an "undeliverable" notice for my first e-mail.

Sorry

**From:** Schneider, Greg [mailto:GSchneider@davcos.com]  
**Sent:** Wednesday, September 10, 2014 2:25 PM  
**To:** Joe Thomas  
**Cc:** Brandon Greulich; lhudson@ntceg.com; Hubackova, Katerina; Schneider, Greg  
**Subject:** Re: REMINDER: Submit Form ECT-1

Lacy- please file for us.

Sent from my iPhone

On Sep 10, 2014, at 2:13 PM, "Joe Thomas" <joe.thomas@tceq.texas.gov> wrote:

Mr. Schneider,

We did not receive a Form ECT-1 for the following sites after a reminder was sent in the e-mail attached below.

Site Name	RN	Company Name	CN	Portfolio
UMBRELLA POINT FACILITY	RN102583507	DAVIS PETROLEUM PIPELINE, LLC	CN603143389	P3302
SHORE ACRES PRODUCTION FACILITY	RN100211739	DAVIS PETROLEUM PIPELINE, LLC	CN603143389	P3303

In order to resolve this issue, please mail the ECT-1 forms and any supporting documentation within 14 days to the following address.

Texas Commission on Environmental Quality  
Emissions Banking and Trading Program (MC-206)  
P.O. Box 13087  
Austin, TX 78711-3087

If the ECT-1 forms are not received within 14 days, we will issue a Notice of Violation for non-compliance with applicable Emission Banking and Trading Program regulations under 30 Texas Administrative Code Chapter 101, Subchapter H. You can reach me at (512) 239-0012 or by e-mail at [joe.thomas@tceq.texas.gov](mailto:joe.thomas@tceq.texas.gov) or my Work Lead Brandon Greulich at (512) 239-4904 or by email at [Brandon.Greulich@tceq.texas.gov](mailto:Brandon.Greulich@tceq.texas.gov) if you have any questions about submitting a Form ECT-1 for the sites referenced above. Please note that the legislature has granted the TCEQ enforcement powers to ensure compliance with environmental regulatory requirements.

Joseph Thomas  
Emissions Banking and Trading Program  
Air Quality Division

**From:** Brandon Greulich  
**Sent:** Wednesday, January 22, 2014 5:54 PM  
**Subject:** REMINDER: Form ECT-1 due by March 31, 2014

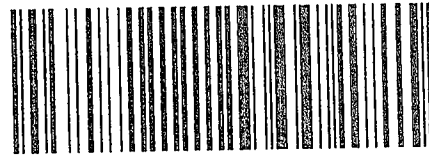
All sites located in the Houston-Galveston-Brazoria ozone nonattainment area with facilities subject to the Mass Emissions Cap and Trade (MECT) program must submit an Annual Compliance Report (Form ECT-1) by **March 31, 2014**.

Form ECT-1 has been updated to facilitate electronic entry of the data required on the Annual Compliance Report. The new Form ECT-1 also specifically lists the rule citations for the monitoring and testing protocols used to determine annual emissions from sources in the MECT Program. For additional information regarding the rule citations and the supporting documentation that should be submitted with the completed Form ECT-1, refer to the TCEQ guidance on the Chapter 117 Monitoring and Testing Protocol Options for Form ECT-1.

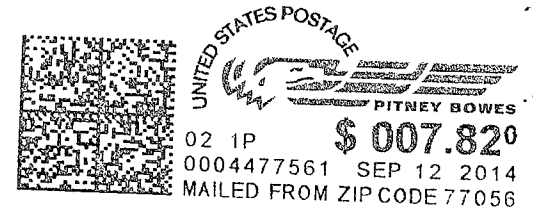
In addition to submitting Form ECT-1, all sites using MECT allowances to satisfy new source review offset requirements must submit an Application to Use Allowances for Offset Requirements (Form ECT-40). Refer to the TCEQ's Guidance on the Use of Allowances for Nonattainment New Source Review Permit Offset Requirements for additional information.

For the 2013 control period, the Application for Transfer of Allowances (Form ECT-2) must be submitted on or before **January 30, 2014**.

Mail all forms to the Texas Commission on Environmental Quality, Emissions Banking and Trading Program (MC-206), PO Box 13087, Austin, Texas 78711-3087.



7008 0500 0001 9896 8812

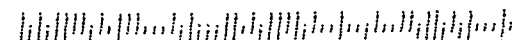
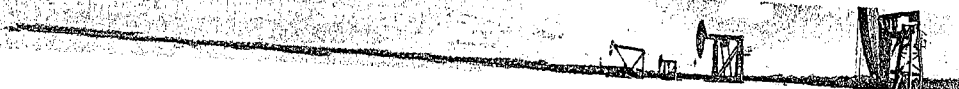


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SEP 15 2014  
TCEQ MAIL CENTER  
JC



Davis  
Petroleum  
Corp.

TCEQ  
Emission Banking & Trading Program  
MC-206  
P.O. Box 13087  
Austin, TX 78711-3087



## Joe Thomas

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**From:** Joe Thomas  
**Sent:** Thursday, September 25, 2014 12:11 PM  
**To:** Brittany Brumley (bbrumley@ceg-group.com); Schneider, Greg (GSchneider@davcos.com)  
**Subject:** Annual Compliance Report for Umbrella Point Facility - Status of ENG-1?  
**Importance:** High

Brittany and Greg,

Thank you for sending the Form ECT-1 for this site. The report covers one engine (ENG-3), but our records show that there should be two engines present. Please let me know the status of ENG-1. Please provide this information by 10/2/2014.

Thanks

EMAIL FOR GREG ACRES ALSO ASKED HOW CONTINUOUS  
MONITOR FOR LOA WORKS.

## Joe Thomas

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**From:** Kari Lazo <KLazo@ntglobal.com>  
**Sent:** Friday, September 26, 2014 10:19 AM  
**To:** Joe Thomas  
**Cc:** gschneider@davcos.com  
**Subject:** RE: Annual Compliance Report for Umbrella Point Facility - Status of ENG-1?

Hi Mr. Thomas,

Status of the engines is as follows:

- ENG-1 (Cat G3304NA) was removed 3/1/2012
- ENG-2 (Cat G399TA) was removed 3/6/2012
- ENG-3 (Cat G3508NA) was removed 5/1/2013

Thank you,

**Kari Lazo**

Air Quality Project Manager | **NTG Environmental**

T: 281.882.8680 | M: 281.687.0659 | [klazo@ntglobal.com](mailto:klazo@ntglobal.com) | [ntglobal.com](http://ntglobal.com)

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**From:** John Wilson  
**Sent:** Thursday, September 25, 2014 12:41 PM  
**To:** Kari Lazo  
**Subject:** FW: Annual Compliance Report for Umbrella Point Facility - Status of ENG-1?  
**Importance:** High

John Wilson, REM, CSEM  
NTG Environmental  
281-872-9300

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**From:** Joe Thomas [<mailto:joe.thomas@tceq.texas.gov>]  
**Sent:** Thursday, September 25, 2014 12:11 PM  
**To:** Brittany Brumley; Schneider, Greg ([GSchneider@davcos.com](mailto:GSchneider@davcos.com))  
**Subject:** Annual Compliance Report for Umbrella Point Facility - Status of ENG-1?  
**Importance:** High

Brittany and Greg,

Thank you for sending the Form ECT-1 for this site. The report covers one engine (ENG-3), but our records show that there should be two engines present. Please let me know the status of ENG-1. Please provide this information by 10/2/2014.

Thanks

## Joe Thomas

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**From:** Kari Lazo <KLazo@ntglobal.com>  
**Sent:** Tuesday, September 30, 2014 3:12 PM  
**To:** Joe Thomas  
**Cc:** gschneider@davcos.com; Hubackova, Katerina (KHubackova@davcos.com)  
**Subject:** RE: Annual Compliance Report for Shore Acres Production Facility: Calculation method for activity?  
**Attachments:** Davis - Shore Acres - MECT 2013 Additional Information.pdf; Davis - Umbrella Point - MECT 2013 Additional Information.pdf

Hi Mr. Thomas,

The most accurate way to calculate the level of activity for these engines is using annual fuel usage. Please see the attached documents which include the calculations as well as the daily compressor reports used. The engines were not equipped with a continuous horsepower monitor or totalizing fuel meter. However, as you can see by the documents provided, sufficient daily monitoring and recordkeeping of the engines were conducted to be able to supply this information. Please let me know if you need anything else.

Thank you,

**Kari Lazo**

Air Quality Project Manager | **NTG Environmental**

T: 281.882.8680 | M: 281.687.0659 | [klazo@ntglobal.com](mailto:klazo@ntglobal.com) | [ntglobal.com](http://ntglobal.com)

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**From:** Joe Thomas [<mailto:joe.thomas@tceq.texas.gov>]  
**Sent:** Thursday, September 25, 2014 1:47 PM  
**To:** Brittany Brumley ([bbrumley@ceg-group.com](mailto:bbrumley@ceg-group.com)); Schneider, Greg  
**Subject:** Annual Compliance Report for Shore Acres Production Facility: Calculation method for activity?  
**Importance:** High

Brittany and Greg,

This applies to the engine at the Shore Acres site as well as the Umbrella Point site. The citation provided for the level of activity indicates that each engine has a continuous monitoring system for horsepower and hours of operation. Please explain how this system works (i.e. specifically how the level of activity is calculated). Please provide this information by 10/1/2014.

Thanks

**DAVIS PETROLEUM PIPELINE, LLC  
UMBRELLA POINT FACILITY  
CHAMBERS COUNTY, TEXAS  
FIN: ENG-1 (CAT G3508NA)**

**EMISSIONS CALCULATIONS**

**TABLE 1: FUEL USAGE**

MONTH	FUEL USAGE (MSCF)
JAN	946
FEB	886
MAR	1036
APR	622
MAY	0
JUN	0
JUL	0
AUG	0
SEP	0
OCT	0
NOV	0
DEC	0
TOTAL	3490

**TABLE 2: ANNUAL EMISSIONS**

ANNUAL FUEL USAGE (MSCF)	3490
HEATING VALUE (BTU/SCF)	1000
FUEL CON. FACTOR (BTU/BHP-HR)	7510
LEVEL OF ACTIVITY (HP-HR)	464714
EMISSION FACTOR (G/HP-HR)	0.263
ANNUAL EMISSIONS (TONS)	0.135

DAVIS PETROLEUM MONTHLY COMPRESSOR REPORT																								
Year 2013		Month JAN		Unit #4416		Equipment Type Cat: G3508- NA				County Chambers		Location Umbrella Pt.		Lease ST75; ST72										
Extremen Call Out 886-888-2615																								
Gas Pressure (PSIG)						Gas Temperature (F)						Engine Speed RPM	Jacket Water Temp	Oil Pressure		AVG. Vol. (MCFD)	Fuel Usage (MCFD)	Volts	Daily Runtime Hours	Daily Maintenance Hours	Daily Downtime Hours	Operator's Initials		
Stage 1		Stage 2		Stage 3		Stage 1		Stage 2		Stage 3				ENG	COMP									
In	Out	In	Out	In	Out	In	Out	In	Out	In	Out													
1	85	230			230	695			195		210	784	180	75	55	754	30		24.0	0.0	0.0	RH		
2	80	220			220	650			175		185	781	178	75	55	581	28		24.0	0.0	0.0	RH		
3	83	225			225	650			180		195	756	178	75	55	304	27		24.0	0.0	0.0	RH		
4	90	245			245	665			180		195	813	178	75	55	550	26		24.0	0.0	0.0	RH		
5	85	230			230	670			180		195	780	180	75	55	939	28		24.0	0.0	0.0	BH		
6	85	230			230	680			180		195	785	180	75	55	972	28		24.0	0.0	0.0	BH		
7	85	245			245	660			180		200	806	180	74	55	883	30		24.0	0.0	0.0	JS		
8	85	225			225	665			157		214	858	180	75	55	988	34		24.0	0.0	0.0	JA		
9	85	230			230	680			185		200	805	182	75	55	809	31		24.0	0.0	0.0	RH		
10	80	230			230	660			180		210	888	180	75	55	641	28		24.0	0.0	0.0	BH		
11	80	225			225	680			195		220	780	183	75	55	550	28		24.0	0.0	0.0	RH		
12	80	220			220	685			195		210	785	185	75	55	537	28		24.0	0.0	0.0	RH		
13	85	235			235	665			180		195	802	180	75	55	1103	33		24.0	0.0	0.0	BH		
14	82	225			225	680			180		200	845	178	75	55	1077	36		24.0	0.0	0.0	JS		
15	80	220			220	665			175		185	811	175	75	55	877	33		24.0	0.0	0.0	RH		
16	85	230			230	680			195		205	903	175	75	55	645	30		24.0	0.0	0.0	RH		
17	80	230			230	670			180		195	780	175	75	55	770	34		24.0	0.0	0.0	BH		
18	80	220			220	630			185		200	768	170	75	55	616	36		24.0	0.0	0.0	RH		
19	85	235			235	660			180		195	791	183	75	55	789	32		24.0	0.0	0.0	RH		
20	80	220			220	680			190		205	868	180	75	55	673	32		24.0	0.0	0.0	BH		
21	80	235			235	690			200		225	777	185	75	55	545	28		24.0	0.0	0.0	RH		
22	80	230			230	670			195		220	827	185	75	55	977	31		24.0	0.0	0.0	BH		
23	81	221			221	680			195		225	778	185	75	55	960	35		24.0	0.0	0.0	FL		
24	80	225			225	675			192		237	775	185	75	55	775	30		24.0	0.0	0.0	JA		
25	80	230			230	690			200		225	776	188	75	55	890	29		24.0	0.0	0.0	JS		
26	85	240			240	700			200		225	768	184	75	55	872	28		24.0	0.0	0.0	JS		
27	80	225			225	690			200		225	777	185	75	55	927	29		24.0	0.0	0.0	JS		
28	80	230			230	680			200		225	882	185	75	55	750	29		24.0	0.0	0.0	BH		
29	80	230			230	690			200		225	767	185	75	55	518	28		24.0	0.0	0.0	BH		
30	85	230			230	700			195		210	835	173	75	56	1023	31		24.0	0.0	0.0	RH		
31	88	233			233	700			200		230	878	181	74	57	1021	33		*24	0	*0	RH		
Total Operating Hours		720.0		Total Downtime Hours		0.0		Total Mechanical Downtime		0.0		Total Mechanical Availability												
REMARKS:		1/31/13- Compressor down 2hrs for P.M. today.																						



## DAVIS PETROLEUM MONTHLY COMPRESSOR REPORT

DAVIS PETROLEUM MONTHLY COMPRESSOR REPORT

DAVIS PETROLEUM MONTHLY COMPRESSOR REPORT						
Year/2013	Month/March	Unit # 4416	Equipment Type/Cat. G3808- NA	County/Chambers	Location/Umbrella Pl.	Lease \$/75, \$/72

[illegible]

# DAVIS PETROLEUM MONTHLY COMPRESSOR REPORT

Year 2013		Month	Unit #	Equipment Type	Location	Lease																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
External Call Out		866-889-2975	4418	Compressor	Umbrella Pt.	STZ																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
Stage 1		Stage 2		Stage 3		Stage 4		Stage 5		Stage 6		Stage 7		Stage 8		Stage 9		Stage 10		Stage 11		Stage 12		Stage 13		Stage 14		Stage 15		Stage 16		Stage 17		Stage 18		Stage 19		Stage 20		Stage 21		Stage 22		Stage 23		Stage 24		Stage 25		Stage 26		Stage 27		Stage 28		Stage 29		Stage 30		Stage 31		Stage 32		Stage 33		Stage 34		Stage 35		Stage 36		Stage 37		Stage 38		Stage 39		Stage 40		Stage 41		Stage 42		Stage 43		Stage 44		Stage 45		Stage 46		Stage 47		Stage 48		Stage 49		Stage 50		Stage 51		Stage 52		Stage 53		Stage 54		Stage 55		Stage 56		Stage 57		Stage 58		Stage 59		Stage 60		Stage 61		Stage 62		Stage 63		Stage 64		Stage 65		Stage 66		Stage 67		Stage 68		Stage 69		Stage 70		Stage 71		Stage 72		Stage 73		Stage 74		Stage 75		Stage 76		Stage 77		Stage 78		Stage 79		Stage 80		Stage 81		Stage 82		Stage 83		Stage 84		Stage 85		Stage 86		Stage 87		Stage 88		Stage 89		Stage 90		Stage 91		Stage 92		Stage 93		Stage 94		Stage 95		Stage 96		Stage 97		Stage 98		Stage 99		Stage 100		Stage 101		Stage 102		Stage 103		Stage 104		Stage 105		Stage 106		Stage 107		Stage 108		Stage 109		Stage 110		Stage 111		Stage 112		Stage 113		Stage 114		Stage 115		Stage 116		Stage 117		Stage 118		Stage 119		Stage 120		Stage 121		Stage 122		Stage 123		Stage 124		Stage 125		Stage 126		Stage 127		Stage 128		Stage 129		Stage 130		Stage 131		Stage 132		Stage 133		Stage 134		Stage 135		Stage 136		Stage 137		Stage 138		Stage 139		Stage 140		Stage 141		Stage 142		Stage 143		Stage 144		Stage 145		Stage 146		Stage 147		Stage 148		Stage 149		Stage 150		Stage 151		Stage 152		Stage 153		Stage 154		Stage 155		Stage 156		Stage 157		Stage 158		Stage 159		Stage 160		Stage 161		Stage 162		Stage 163		Stage 164		Stage 165		Stage 166		Stage 167		Stage 168		Stage 169		Stage 170		Stage 171		Stage 172		Stage 173		Stage 174		Stage 175		Stage 176		Stage 177		Stage 178		Stage 179		Stage 180		Stage 181		Stage 182		Stage 183		Stage 184		Stage 185		Stage 186		Stage 187		Stage 188		Stage 189		Stage 190		Stage 191		Stage 192		Stage 193		Stage 194		Stage 195		Stage 196		Stage 197		Stage 198		Stage 199		Stage 200		Stage 201		Stage 202		Stage 203		Stage 204		Stage 205		Stage 206		Stage 207		Stage 208		Stage 209		Stage 210		Stage 211		Stage 212		Stage 213		Stage 214		Stage 215		Stage 216		Stage 217		Stage 218		Stage 219		Stage 220		Stage 221		Stage 222		Stage 223		Stage 224		Stage 225		Stage 226		Stage 227		Stage 228		Stage 229		Stage 230		Stage 231		Stage 232		Stage 233		Stage 234		Stage 235		Stage 236		Stage 237		Stage 238		Stage 239		Stage 240		Stage 241		Stage 242		Stage 243		Stage 244		Stage 245		Stage 246		Stage 247		Stage 248		Stage 249		Stage 250		Stage 251		Stage 252		Stage 253		Stage 254		Stage 255		Stage 256		Stage 257		Stage 258		Stage 259		Stage 260		Stage 261		Stage 262		Stage 263		Stage 264		Stage 265		Stage 266		Stage 267		Stage 268		Stage 269		Stage 270		Stage 271		Stage 272		Stage 273		Stage 274		Stage 275		Stage 276		Stage 277		Stage 278		Stage 279		Stage 280		Stage 281		Stage 282		Stage 283		Stage 284		Stage 285		Stage 286		Stage 287		Stage 288		Stage 289		Stage 290		Stage 291		Stage 292		Stage 293		Stage 294		Stage 295		Stage 296		Stage 297		Stage 298		Stage 299		Stage 300		Stage 301		Stage 302		Stage 303		Stage 304		Stage 305		Stage 306		Stage 307		Stage 308		Stage 309		Stage 310		Stage 311		Stage 312		Stage 313		Stage 314		Stage 315		Stage 316		Stage 317		Stage 318		Stage 319		Stage 320		Stage 321		Stage 322		Stage 323		Stage 324		Stage 325		Stage 326		Stage 327		Stage 328		Stage 329		Stage 330		Stage 331		Stage 332		Stage 333		Stage 334		Stage 335		Stage 336		Stage 337		Stage 338		Stage 339		Stage 340		Stage 341		Stage 342		Stage 343		Stage 344		Stage 345		Stage 346		Stage 347		Stage 348		Stage 349		Stage 350		Stage 351		Stage 352		Stage 353		Stage 354		Stage 355		Stage 356		Stage 357		Stage 358		Stage 359		Stage 360		Stage 361		Stage 362		Stage 363		Stage 364		Stage 365		Stage 366		Stage 367		Stage 368		Stage 369		Stage 370		Stage 371		Stage 372		Stage 373		Stage 374		Stage 375		Stage 376		Stage 377		Stage 378		Stage 379		Stage 380		Stage 381		Stage 382		Stage 383		Stage 384		Stage 385		Stage 386		Stage 387		Stage 388		Stage 389		Stage 390		Stage 391		Stage 392		Stage 393		Stage 394		Stage 395		Stage 396		Stage 397		Stage 398		Stage 399		Stage 400		Stage 401		Stage 402		Stage 403		Stage 404		Stage 405		Stage 406		Stage 407		Stage 408		Stage 409		Stage 410		Stage 411		Stage 412		Stage 413		Stage 414		Stage 415		Stage 416		Stage 417		Stage 418		Stage 419		Stage 420		Stage 421		Stage 422		Stage 423		Stage 424		Stage 425		Stage 426		Stage 427		Stage 428		Stage 429		Stage 430		Stage 431		Stage 432		Stage 433		Stage 434		Stage 435		Stage 436		Stage 437		Stage 438		Stage 439		Stage 440		Stage 441		Stage 442		Stage 443		Stage 444		Stage 445		Stage 446		Stage 447		Stage 448		Stage 449		Stage 450		Stage 451		Stage 452		Stage 453		Stage 454		Stage 455		Stage 456		Stage 457		Stage 458		Stage 459		Stage 460		Stage 461		Stage 462		Stage 463		Stage 464		Stage 465		Stage 466		Stage 467		Stage 468		Stage 469		Stage 470		Stage 471		Stage 472		Stage 473		Stage 474		Stage 475		Stage 476		Stage 477		Stage 478		Stage 479		Stage 480		Stage 481		Stage 482		Stage 483		Stage 484		Stage 485		Stage 486		Stage 487		Stage 488		Stage 489		Stage 490		Stage 491		Stage 492		Stage 493		Stage 494		Stage 495		Stage 496		Stage 497		Stage 498		Stage 499		Stage 500		Stage 501		Stage 502		Stage 503		Stage 504		Stage 505		Stage 506		Stage 507		Stage 508		Stage 509		Stage 510		Stage 511		Stage 512		Stage 513		Stage 514		Stage 515		Stage 516		Stage 517		Stage 518		Stage 519		Stage 520		Stage 521		Stage 522		Stage 523		Stage 524		Stage 525		Stage 526		Stage 527		Stage 528		Stage 529		Stage 530		Stage 531		Stage 532		Stage 533		Stage 534		Stage 535		Stage 536		Stage 537		Stage 538		Stage 539		Stage 540		Stage 541		Stage 542		Stage 543		Stage 544		Stage 545		Stage 546		Stage 547		Stage 548		Stage 549		Stage 550		Stage 551		Stage 552		Stage 553		Stage 554		Stage 555		Stage 556		Stage 557		Stage 558		Stage 559		Stage 560		Stage 561		Stage 562		Stage 563		Stage 564		Stage 565		Stage 566		Stage 567		Stage 568		Stage 569		Stage 570		Stage 571		Stage 572		Stage 573		Stage 574		Stage 575		Stage 576		Stage 577		Stage 578		Stage 579		Stage 580		Stage 581		Stage 582		Stage 583		Stage 584		Stage 585		Stage 586		Stage 587		Stage 588		Stage 589		Stage 590		Stage 591		Stage 592		Stage 593		Stage 594		Stage 595		Stage 596		Stage 597		Stage 598		Stage 599		Stage 600		Stage 601		Stage 602		Stage 603		Stage 604		Stage 605		Stage 606		Stage 607		Stage 608		Stage 609		Stage 610		Stage 611		Stage 612		Stage 613		Stage 614		Stage 615		Stage 616		Stage 617		Stage 618		Stage 619		Stage 620		Stage 621		Stage 622		Stage 623		Stage 624		Stage 625		Stage 626		Stage 627		Stage 628		Stage 629		Stage 630		Stage 631		Stage 632		Stage 633		Stage 634		Stage 635		Stage 636		Stage 637		Stage 638		Stage 639		Stage 640		Stage 641		Stage 642		Stage 643		Stage 644		Stage 645		Stage 646		Stage 647		Stage 648		Stage 649		Stage 650		Stage 651		Stage 652		Stage 653		Stage 654		Stage 655		Stage 656		Stage 657		Stage 658		Stage 659		Stage 660		Stage 661		Stage 662		Stage 663		Stage 664		Stage 665		Stage 666		Stage 667		Stage 668		Stage 669		Stage 670		Stage 671		Stage 672		Stage 673		Stage 674		Stage 675		Stage 676		Stage 677		Stage 678		Stage 679		Stage 680		Stage 681		Stage 682		Stage 683		Stage 684		Stage 685		Stage 686		Stage 687		Stage 688		Stage 689		Stage 690		Stage 691		Stage 692		Stage 693		Stage 694		Stage 695		Stage 696		Stage 697		Stage 698		Stage 699		Stage 700		Stage 701		Stage 702		Stage 703		Stage 704		Stage 705		Stage 706		Stage 707		Stage 708		Stage 709		Stage 710		Stage 711		Stage 712		Stage 713		Stage 714		Stage 715		Stage 716		Stage 717		Stage 718		Stage 719		Stage 720		Stage 721		Stage 722		Stage 723		Stage 724		Stage 725		Stage 726		Stage 727		Stage 728		Stage 729		Stage 730		Stage 731		Stage 732		Stage 733		Stage 734		Stage 735		Stage 736		Stage 737		Stage 738		Stage 739		Stage 740		Stage 741		Stage 742		Stage 743		Stage 744		Stage 745		Stage 746		Stage 747		Stage 748		Stage 749		Stage 750		Stage 751		Stage 752		Stage 753		Stage 754		Stage 755		Stage 756		Stage 757		Stage 758		Stage 759		Stage 760		Stage 761		Stage 762		Stage 763		Stage 764		Stage 765		Stage 766		Stage 767		Stage 768		Stage 769		Stage 770		Stage 771		Stage 772		Stage 773		Stage 774		Stage 775		Stage 776		Stage 777		Stage 778		Stage 779		Stage 780		Stage 781		Stage 782		Stage 783		Stage 784		Stage 785		Stage 786		Stage 787		Stage 788		Stage 789		Stage 790		Stage 791		Stage 792		Stage 793		Stage 794		Stage 795		Stage 796		Stage 797		Stage 798		Stage 799		Stage 800		Stage 801		Stage 802		Stage 803		Stage 804		Stage 805		Stage 806		Stage 807		Stage 808		Stage 809		Stage 810		Stage 811		Stage 812		Stage 813		Stage 814		Stage 815		Stage 816		Stage 817		Stage 818		Stage 819		Stage 820		Stage 821		Stage 822		Stage 823		Stage 824		Stage 825		Stage 826		Stage 827		Stage 828		Stage 829		Stage 830		Stage 831		Stage 832		Stage 833		Stage 834		Stage 835		Stage 836		Stage 837		Stage 838		Stage 839		Stage 840		Stage 841		Stage 842		Stage 843		Stage 844		Stage 845		Stage 846		Stage 847		Stage 848		Stage 849		Stage 850		Stage 851		Stage 852		Stage 853		Stage 854		Stage 855		Stage 856		Stage 857		Stage 858		Stage 859		Stage 860		Stage 861		Stage 862		Stage 863		Stage 864		Stage 865		Stage 866		Stage 867		Stage 868		Stage 869		Stage 870		Stage 871		Stage 872		Stage 873		Stage 874		Stage 875		Stage 876		Stage 877		Stage 878		Stage 879		Stage 880		Stage 881		Stage 882		Stage 883		Stage 884		Stage 885		Stage 886		Stage 887		Stage 888		Stage 889		Stage 890		Stage 891		Stage 892		Stage 893		Stage 894		Stage 895		Stage 896		Stage 897		Stage 898		Stage 899		Stage 900		Stage 901		Stage 902		Stage 903		Stage 904		Stage 905		Stage 906		Stage 907		Stage 908		Stage 909		Stage 910		Stage 911		Stage 912		Stage 913		Stage 914		Stage 915		Stage 916		Stage 917		Stage 918		Stage 919		Stage 920		Stage 921		Stage 922		Stage 923		Stage 924		Stage 925		Stage 926		Stage 927		Stage 928		Stage 929		Stage 930		Stage 931		Stage 932		Stage 933		Stage 934		Stage 935		Stage 936		Stage 937		Stage 938		Stage 939		Stage 940		Stage 941		Stage 942		Stage 943		Stage 944		Stage 945		Stage 946		Stage 947		Stage 948		Stage 949		Stage 950		Stage 951		Stage 952	

## Joe Thomas

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**From:** Joe Thomas  
**Sent:** Tuesday, September 30, 2014 4:56 PM  
**To:** 'Kari Lazo'  
**Cc:** gschneider@davcos.com; Hubackova, Katerina (KHubackova@davcos.com); Lindley Anderson; Brandon Greulich  
**Subject:** RE: Annual Compliance Report for Shore Acres Production Facility: Calculation method for activity?

Ms. Lazo,

How was the fuel use determined? The records provided just show that fuel use is recorded daily, not how it is monitored. Per §101.354(b), the company must justify both why the fuel use was not monitored as required by Chapter 117 and why the method used is appropriate.

Since fuel use was not monitored per Chapter 117 requirements, the proper citation that should be used in §101.354(b). Note that use of this citation indicates that the site is likely in violation of the Chapter 117 requirements.

Please explain how the fuel use monitoring is done and provide the required justifications by 10/8/2014.

Thanks  
Joseph Thomas  
Emission Banking and Trading Program  
Air Quality Division  
(512) 239-0012

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**From:** Kari Lazo [<mailto:KLazo@ntglobal.com>]  
**Sent:** Tuesday, September 30, 2014 3:12 PM  
**To:** Joe Thomas  
**Cc:** gschneider@davcos.com; Hubackova, Katerina (KHubackova@davcos.com)  
**Subject:** RE: Annual Compliance Report for Shore Acres Production Facility: Calculation method for activity?

Hi Mr. Thomas,

The most accurate way to calculate the level of activity for these engines is using annual fuel usage. Please see the attached documents which include the calculations as well as the daily compressor reports used. The engines were not equipped with a continuous horsepower monitor or totalizing fuel meter. However, as you can see by the documents provided, sufficient daily monitoring and recordkeeping of the engines were conducted to be able to supply this information. Please let me know if you need anything else.

Thank you,  
**Kari Lazo**  
Air Quality Project Manager | NTG Environmental  
T: 281.882.8680 | M: 281.687.0659 | [klazo@ntglobal.com](mailto:klazo@ntglobal.com) | [ntglobal.com](http://ntglobal.com)

## Joe Thomas

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**From:** Kari Lazo <KLazo@ntglobal.com>  
**Sent:** Wednesday, October 08, 2014 4:39 PM  
**To:** Joe Thomas  
**Cc:** Hubackova, Katerina (KHubackova@davcos.com); gschneider@davcos.com  
**Subject:** RE: Annual Compliance Report for Shore Acres Production Facility: Calculation method for activity?

Hi Mr. Thomas,

The Umbrella Point engine was located on an offshore platform. The fuel for the entire platform was metered. The average fuel use for the platform excluding the engine was known because the fuel was metered prior to the engine being installed. This amount was subtracted from the total fuel use of the platform and the remaining fuel was attributed to the engine.

For the Shores Acres engine, the fuel use was calculated by the engine vendor using manufacture data at the time of installation. This number is adjusted daily according to runtime hours and documented.

In both cases, the level of activity calculations used the most accurate data available while still resulting in conservative emissions. This was understood to be an acceptable method of compliance.

Please let me know if you need anything else.

Thank you,

**Kari Lazo**

Air Quality Project Manager | **NTG Environmental**

T: 281.882.8680 | M: 281.687.0659 | [klazo@ntglobal.com](mailto:klazo@ntglobal.com) | [ntglobal.com](http://ntglobal.com)

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**From:** Joe Thomas [<mailto:joe.thomas@tceq.texas.gov>]  
**Sent:** Tuesday, September 30, 2014 4:56 PM  
**To:** Kari Lazo  
**Cc:** [gschneider@davcos.com](mailto:gschneider@davcos.com); Hubackova, Katerina ([KHubackova@davcos.com](mailto:KHubackova@davcos.com)); Lindley Anderson; Brandon Greulich  
**Subject:** RE: Annual Compliance Report for Shore Acres Production Facility: Calculation method for activity?

Ms. Lazo,

How was the fuel use determined? The records provided just show that fuel use is recorded daily, not how it is monitored. Per §101.354(b), the company must justify both why the fuel use was not monitored as required by Chapter 117 and why the method used is appropriate.

Since fuel use was not monitored per Chapter 117 requirements, the proper citation that should be used in §101.354(b). Note that use of this citation indicates that the site is likely in violation of the Chapter 117 requirements.

Please explain how the fuel use monitoring is done and provide the required justifications by 10/8/2014.

Thanks  
Joseph Thomas

## Joe Thomas

---

**From:** Joe Thomas  
**Sent:** Thursday, October 09, 2014 10:19 AM  
**To:** 'Kari Lazo'  
**Cc:** Hubackova, Katerina (KHubackova@davcos.com); gschneider@davcos.com; Brandon Greulich; Lindley Anderson; Joe Doby  
**Subject:** RE: Annual Compliance Report for Shore Acres Production Facility: Calculation method for activity?

Ms. Lazo,

The monitoring of fuel use described below does not appear to be compliant with the requirements of 30 TAC §117.2035(a). I will use the information provided to process the annual compliance reports per §101.354(b) but will note a potential deviation of the Chapter 117 requirements for the Shore Acres site (this will not be done for the Umbrella Point site only because the engine was removed in May 2013). The provisions in §101.354(b) do not relieve Davis Petroleum Pipeline's obligation to monitor as required by Chapter 117, but rather allows the use of certain alternate data for an annual compliance report when the required data is not available. If the company has questions about the monitoring requirements, it would be best to discuss the issues with staff in Region 12.

Thanks  
Joseph Thomas  
Emission Banking and Trading Program  
Air Quality Division  
(512) 239-0012

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**From:** Kari Lazo [mailto:KLazo@ntglobal.com]  
**Sent:** Wednesday, October 08, 2014 4:39 PM  
**To:** Joe Thomas  
**Cc:** Hubackova, Katerina (KHubackova@davcos.com); gschneider@davcos.com  
**Subject:** RE: Annual Compliance Report for Shore Acres Production Facility: Calculation method for activity?

Hi Mr. Thomas,

The Umbrella Point engine was located on an offshore platform. The fuel for the entire platform was metered. The average fuel use for the platform excluding the engine was known because the fuel was metered prior to the engine being installed. This amount was subtracted from the total fuel use of the platform and the remaining fuel was attributed to the engine.

For the Shores Acres engine, the fuel use was calculated by the engine vendor using manufacture data at the time of installation. This number is adjusted daily according to runtime hours and documented.

In both cases, the level of activity calculations used the most accurate data available while still resulting in conservative emissions. This was understood to be an acceptable method of compliance.

Please let me know if you need anything else.

Thank you,  
**Kari Lazo**  
Air Quality Project Manager | NTG Environmental

Bryan W. Shaw, Ph.D., P.E., *Chairman*  
Toby Baker, *Commissioner*  
Zak Covar, *Commissioner*  
Richard A. Hyde, P.E., *Executive Director*



## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

October 21, 2014

Mr. Greg Schneider  
Vice President  
Davis Petroleum Pipeline, LLC  
1330 Post Oak Blvd Suite 600  
Houston, Texas 77056

Re: Mass Emissions Cap and Trade Program Annual Compliance Report  
Umbrella Point Facility  
Baytown, Chambers County  
Regulated Entity Reference Number: RN102583507  
Customer Reference Number: CN603143389  
Portfolio Number: P3302

Dear Mr. Schneider:

This letter acknowledges receipt of Umbrella Point Facility's Annual Compliance Report (Form ECT-1) received on September 15, 2014 for the purpose of compliance with 30 Texas Administrative Code §101.359 for the 2013 control period.

The review of Form ECT-1 and all associated information has been completed. Please find the enclosed table reflecting the Umbrella Point Facility's compliance account summary for the 2013 control period. Any requests for revision to this Annual Compliance Report must be submitted within 90 days from the date of this letter.

**Annual compliance reports must be submitted by March 31st after each control period. The Executive Director may withhold approval of any proposed trades for sites that fail to submit a Form ECT-1 by the required due date.** Failure to comply with the requirements in 30 TAC Chapter 101, Subchapter H, may result in enforcement action.

Thank you for your cooperation in this matter. If you have questions concerning this review, please contact Mr. Joseph Thomas at (512) 239-0012 or write to the Texas Commission on Environmental Quality, Office of Air, Air Quality Division (MC-206), PO Box 13087, Austin, Texas 78711-3087.

Mr. Greg Schneider  
Page 2  
October 21, 2014

This action is taken under authority delegated by the executive director of the Texas Commission on Environmental Quality.

Sincerely,

A handwritten signature in black ink, appearing to read "David Brymer". The signature is fluid and cursive, with the first name "David" being more prominent than the last name "Brymer".

David Brymer, Director  
Air Quality Division

DB/JT/mm

cc: Air Section Manager, Region 12 – Houston  
Ms. Brittany Brumley, Environmental Consultant, New Tech Carr Environmental Group,  
Houston

Project Number: 409395



**Compliance Account Summary for the 2013 Control Period**  
**Regulated Entity Reference Number: RN102583507**

Allowances based on historical emissions:

2013 Initial Allocation	0.0
2013 Transferred Out	2.7
2013 Transferred In	2.7
<b>Subtotal, Current Year Allowances:</b>	0.0
2013 Actual Emissions	0.2
<b>Subtotal, Current Year Balance:</b>	-0.2
2012 Vintage Allowances	0.0
2012 Transferred Out	0.0
2012 Transferred In	1.0
2012 Vintage Applied to Current Year	0.2
<b>Subtotal, Expired Vintage Allowances:</b>	0.8
<b>Total, Remaining 2013 Allowances:</b>	0.0

Project Number: 409395

## Banking and Trading Route Slip

<b>AIR QUALITY DIVISION</b> <b>Emissions Banking and Trading Program (EBTP)</b>											
<b>Company Name:</b> <span style="font-family: cursive;">DAVIS PETROLEUM PIPELINE, LLC</span>											
<b>Project Number:</b> <span style="font-family: cursive;">409395</span>											
<b>Type of Letter Correspondence:</b> <span style="font-family: cursive;">CTAL</span> <span style="font-family: cursive;">CTTR</span>											
<b>Letter Document Number(s):</b> <span style="font-family: cursive;">23889</span> <span style="font-family: cursive;">23890</span>											
<b>Certificate Number(s):</b> <span style="font-family: cursive;">N/A</span>											
Review and Approval	Initial and Date	Comments/Special Instructions									
Brandon Greulich, Work Lead EBTP	<span style="font-family: cursive;">DB</span> <span style="font-family: cursive;">JAT</span> For BG <span style="font-family: cursive;">10/12/2014</span>	Minor edits. Look into stream trading. <span style="font-family: cursive;">10/20/14 - DB</span>									
Author/Creator Review	<span style="font-family: cursive;">JAT</span> <span style="font-family: cursive;">10/17/2014</span>										
Peer Review Completed	<span style="font-family: cursive;">MM</span> <span style="font-family: cursive;">10/10/14</span>										
Author/Creator	<span style="font-family: cursive;">JAT</span> <span style="font-family: cursive;">10/9/2014</span>		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #d3d3d3;"> <th style="width: 50%; padding: 2px;">Copies Made</th> <th style="width: 50%; padding: 2px;">Date</th> </tr> </thead> <tbody> <tr> <td style="padding: 2px;"><span style="font-family: cursive;">JAT</span></td> <td style="padding: 2px;"><span style="font-family: cursive;">10/21/2014</span></td> </tr> <tr> <td style="padding: 2px;">Mailed</td> <td style="padding: 2px;">Date</td> </tr> <tr> <td style="padding: 2px;"><span style="font-family: cursive;">JAT</span></td> <td style="padding: 2px;"><span style="font-family: cursive;">10/21/2014</span></td> </tr> </tbody> </table>	Copies Made	Date	<span style="font-family: cursive;">JAT</span>	<span style="font-family: cursive;">10/21/2014</span>	Mailed	Date	<span style="font-family: cursive;">JAT</span>	<span style="font-family: cursive;">10/21/2014</span>
Copies Made	Date										
<span style="font-family: cursive;">JAT</span>	<span style="font-family: cursive;">10/21/2014</span>										
Mailed	Date										
<span style="font-family: cursive;">JAT</span>	<span style="font-family: cursive;">10/21/2014</span>										
Please return <b>Routing Slip</b> and <b>Project Paperwork</b> to Brandon Greulich, MC-206, Ext. 4904											

C 10/23/2014

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