

AIR CP_102531571_CP_20191206_INVESTIGATION_1612298_.PDF
Texas Commission on Environmental Quality
Investigation Report

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Customer: Burlington Resources Oil & Gas Company LP
Customer Number: CN602989436

Regulated Entity Name: WEST WADDELL RANCH SAT311

Regulated Entity Number: RN102531571

Investigation	# 1612298	Incident Numbers	325672
Investigator:	HEATHER FAIRBANKS	Site Classification	PERMIT BY RULE
Conducted:	12/06/2019 -- 12/06/2019	NAIC Code:	211111
Program(s):	AIR NEW SOURCE PERMITS	SIC Code:	1311
Investigation Type:	Compliance Invest File Review	Location:	20 MI NORTHWEST OF CRANE OFF HWY 1233
Additional ID(s):	CY0223G 33774		

Address: ,
, ,

Local Unit: REGION 07 - MIDLAND

Activity Type(s): OG - Oil and Gas - AIR QUALITY High Level
UML3IH - AIR UML3IH - IN HOUSE
UPSETMAINTENANCE LEVEL 3

Principal(s):

Role	Name
RESPONDENT	BURLINGTON RESOURCES OIL & GAS COMPANY LP

Contact(s):

Role	Title	Name	Phone
REGULATED ENTITY CONTACT		MR MILIND BHATTE	Work (832) 486-2337

Other Staff Member(s):

Role	Name
QA Reviewer	CYNTHIA BREZINA
Supervisor	RYAN SLOCUM

Associated Check List

<u>Checklist Name</u>	<u>Unit Name</u>
AIR EMISSIONS EVENT REVIEW (ON OR AFTER 01/05/2006)	325672
AIR GENERIC INVESTIGATION (10 ITEMS)	325672

Investigation Comments:

Introduction

On December 6, 2019, an Air UML3 investigation was conducted by Environmental Investigator, Heather

12/6/2019 Inv. # - 1612298

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Fairbanks, from the Midland Regional Office (MRO) of the Texas Commission on Environmental Quality (TCEQ) for the ConocoPhillips Company, West Waddell Ranch Sat 311, also known as Regulated Entity (RE) in this investigation, Incident Number 325672 (Attachment 1).

Daily Narrative

Failure to report the incident properly to the TCEQ Midland Regional Office within 24 hours after the discovery of the event under 30 TAC 101.201(a)(1)(B), the unauthorized emissions became ineligible for exemption. Incident 325672 was reviewed for compliance with the 30 Texas Administrative Code (TAC) Chapter 101 § 101.201, 101.222 (a) and (b). The incident was discovered at 02:00 on November 28, 2019; however, ConocoPhillips Company initially reported the event electronically at 19:09 on November 29, 2019, 17 hours 9 minutes late after the 24 hour deadline. This is an alleged violation of 30 TAC Chapter 101.201(a)(1)(B) which requires initial notification of a reportable emissions event within 24 hours of discovery to the Commission. This is classified as a category C-3 violation by the Enforcement Initiation Criteria (EIC) document.

A Reportable Events 12 Month Summary (Attachment 2) indicates that there have been six reportable emission events involving this site in the past year. Based upon the information provided by the RE, these incidents could not have been prevented by good design, operation and maintenance practices. The emissions from these events were not part of a frequent or recurring pattern due to inadequate design, operation or maintenance after discovery of a reportable emissions event. The incidents were found not to be excessive under 30 TAC 101.222(a) and it appears the RE has provided an adequate affirmative defense in accordance with 30 TAC 101.222(b) with the exception of late reporting (Attachment 1). The attached Emission Event Review Checklists provides the subject compliance review.

EXIT INTERVIEW

Milind Bhatte, with ConocoPhillips, has been informed via email on December 3, 2019, that he will be receiving a Notice of Violation (NOV) letter regarding this incident.

NOV Date	12/11/2019	Method	WRITTEN
OUTSTANDING ALLEGED VIOLATION(S)			
ASSOCIATED TO A NOTICE OF VIOLATION			

Track Number: 735718**Compliance Due Date:** 01/10/2020**Violation Start Date:** 11/29/2019**30 TAC Chapter 101.201(a)(1)(B)**
5C THSC Chapter 382.085(b)**Alleged Violation:****Investigation:** 1612298

Comment Date: 12/10/2019

Failure to report the incident properly to the TCEQ Midland Regional Office within 24 hours after the discovery of the event under 30 TAC 101.201(a)(1)(B), the unauthorized emissions became ineligible for exemption. Incident 325672 was reviewed for compliance with the 30 Texas Administrative Code (TAC) Chapter 101 § 101.201, 101.222 (a) and (b). The incident was discovered at 02:00 on November 28, 2019; however, ConocoPhillips Company initially reported the event electronically at 19:09 on November 29, 2019, 17 hours 9 minutes late after the 24 hour deadline. This is an alleged violation of 30 TAC Chapter 101.201(a)(1)(B) which requires initial notification of a reportable emissions event within 24 hours of discovery to the Commission. This is classified as a category C-3 violation by the Enforcement Initiation Criteria (EIC) document.

Recommended Corrective Action: Ensure initial notification is submitted within 24 hours of discovery for all reportable emissions events to the TCEQ Midland Regional Office.

Signed 
Environmental Investigator

Date 12/10/19

Signed 
Supervisor

Date 12-10-19

Attachments: (in order of final report submittal)

☐ Enforcement Action Request (EAR)
☒ Letter to Facility (specify type) : NOV
Investigation Report
☐ Sample Analysis Results
☐ Manifests
☐ Notice of Registration

☐ Maps, Plans, Sketches
☐ Photographs
☐ Correspondence from the facility
☒ Other (specify) :
Incident _____
Reportable Events 12 Month Summary

Jon Niermann, *Chairman*
Emily Lindley, *Commissioner*
Bobby Janecka, *Commissioner*
Toby Baker, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

December 11, 2019

CERTIFIED MAIL # 7016 2140 0000 4916 6409
RETURN RECEIPT REQUESTED

Mr. Milind Bhatte
ConocoPhillips Company
925 N Eldridge Parkway
EC3-10-10W335
Houston, TX 77079

Re: Notice of Violation for Compliance Evaluation Investigation at:
West Waddell Ranch Sat 311
Crane, Crane County, Texas
Regulated Entity No.: 102531571

Dear Mr. Bhatte,

On December 6, 2019, Heather Fairbanks of the Texas Commission on Environmental Quality (TCEQ) Midland Regional Office conducted an investigation of the above-referenced regulated entity to evaluate compliance with applicable requirements for air quality. Enclosed is a summary which lists the investigation findings. A certain outstanding alleged violation was identified for which compliance documentation is required. Please submit to this office by January 10, 2020 a written description of corrective action taken.

In the listing of the alleged violation, we have cited applicable requirements, including TCEQ rules. Please note that both the rules themselves and the agency brochure entitled *Obtaining TCEQ Rules* (GI 032) are located on our agency website at <http://www.tceq.texas.gov> for your reference. If you would like a hard copy of this brochure mailed to you, you may call and request one from either the Midland Region Office at (432) 570-1359 or the Central Office Publications Ordering Team at 512-239-0028.

The TCEQ appreciates your assistance in this matter. Please note that the Legislature has granted TCEQ enforcement powers which we may exercise to ensure compliance with environmental regulatory requirements. We anticipate that you will resolve the alleged violations as required in order to protect the State's environment. If you have additional information that we are unaware of, you have the opportunity to contest the violation documented in this notice. Should you choose to do so, you must notify the

Milind Bhatte
Page 2
December 11, 2019

Midland Region Office within 10 days from the date of this letter. At that time, Mr. Ryan Slocum will schedule a violation review meeting to be conducted December 31, 2019. However, please be advised that if you decide to participate in the violation review process, the TCEQ may still require you to adhere to the compliance schedule included in the enclosed Summary of Investigation Findings until an official decision is made regarding the status of any or all of the contested violations.

If you or members of your staff have any questions, please feel free to contact Ms. Heather Fairbanks in the Midland Region Office at (432) 570-1359.

Sincerely,

A handwritten signature in black ink, appearing to read 'RS', is positioned above the typed name of Ryan Slocum.

Ryan Slocum
Section Manager
Midland Regional Office
Texas Commission on Environmental Quality

RS/hlf

Enclosure: Summary of Investigation Findings

Summary of Investigation Findings

WEST WADDELL RANCH SAT311

Investigation #

1612298

Investigation Date: 12/06/2019

, CRANE COUNTY,

Additional ID(s): CY0223G
33774

OUTSTANDING ALLEGED VIOLATION(S) ASSOCIATED TO A NOTICE OF VIOLATION

Track No: 735718 Compliance Due Date: 01/10/2020

30 TAC Chapter 101.201(a)(1)(B)

5C THSC Chapter 382.085(b)

Alleged Violation:

Investigation: 1612298

Comment Date: 12/10/2019

Failure to report the incident properly to the TCEQ Midland Regional Office within 24 hours after the discovery of the event under 30 TAC 101.201(a)(1)(B), the unauthorized emissions became ineligible for exemption. Incident 325672 was reviewed for compliance with the 30 Texas Administrative Code (TAC) Chapter 101 § 101.201, 101.222 (a) and (b). The incident was discovered at 02:00 on November 28, 2019; however, ConocoPhillips Company initially reported the event electronically at 19:09 on November 29, 2019, 17 hours 9 minutes late after the 24 hour deadline. This is an alleged violation of 30 TAC Chapter 101.201(a)(1)(B) which requires initial notification of a reportable emissions event within 24 hours of discovery to the Commission. This is classified as a category C-3 violation by the Enforcement Initiation Criteria (EIC) document.

Recommended Corrective Action: Ensure initial notification is submitted within 24 hours of discovery for all reportable emissions events to the TCEQ Midland Regional Office.

Texas Commission on Environmental Quality

AIR EMISSIONS EVENT REVIEW (ON OR AFTER 01/05/2006) Checklist

Unit Name : 325672 Investigation # :1612298 Facility Name : WEST WADDELL RANCH SAT311	County : CRANE TCEQ Investigator : HEATHER FAIRBANKS
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Item No.	Description	Answer	Comments	Due Date
1	Was the emissions event(s) excessive? [101.222(a)]	NO		
2	Did the owner/operator comply with the requirements of TAC §101.201 (relating to Emissions Event Reporting and Recordkeeping Requirements)? [101.222(b)(1)]	NO		
3	Did the owner/operator prove that the unauthorized emissions were caused by a sudden, unavoidable breakdown of equipment or process, beyond the control of the owner/operator? [101.222(b)(2)]	YES		
4	Did the owner/operator prove that the unauthorized emissions did not stem from any activity/event that could have been foreseen and avoided/planned for, or been avoided by better operation and maintenance practices or technically feasible design consistent with good engineering practice? [101.222(b)(3)]	YES		
5	Did the owner/operator prove that the air pollution control equipment/processes were maintained and operated in a manner consistent with good practice for minimizing emissions and reducing the number of emissions events? [101.222(b)(4)]	YES		
6	Did the owner/operator prove that prompt action was taken to achieve compliance once the operator knew or should have known that applicable emission limitations were being exceeded, and any necessary repairs were made as expeditiously as practicable? [101.222(b)(5)]	YES		
7	Did the owner/operator prove that the amount and duration of the unauthorized emissions and any bypass of pollution control equipment were minimized and all possible steps were taken to minimize the impact of the unauthorized emissions on ambient air quality? [101.222(b)(6)]	YES		
8	Did the owner/operator prove that all emission monitoring systems were kept in operation if possible? [101.222(b)(7)]	YES		
9	Did the owner/operator prove that the owner/operator actions in response to the unauthorized emissions were documented by contemporaneous operation logs or other relevant evidence? [101.222(b)(8)]	YES		
10	Did the owner/operator prove that the unauthorized emissions were not part of a frequent or recurring pattern indicative of inadequate design, operation, or maintenance? [101.222(b)(9)]	YES		
11	Did the owner/operator prove that the percentage of a facility's total annual operating hours during which unauthorized emissions occurred were not unreasonably high? [101.222(b)(10)]	YES		
12	Did the owner/operator prove that the unauthorized emissions did not cause or contribute to an exceedance of the national ambient air quality standards (NAAQS), prevention of significant deterioration (PSD) increments, or to a condition of air pollution? [101.222(b)(11)]	YES		

13	Item 1	NOT APPLICABLE		
14	Item 2	NOT APPLICABLE		
15	Item 3	NOT APPLICABLE		
16	Item 4	NOT APPLICABLE		
17	Item 5	NOT APPLICABLE		
18	Item 6	NOT APPLICABLE		
19	Item 7	NOT APPLICABLE		
20	Item 8	NOT APPLICABLE		
21	Item 9	NOT APPLICABLE		
22	Item 10	NOT APPLICABLE		

Texas Commission on Environmental Quality

AIR GENERIC INVESTIGATION (10 ITEMS) Checklist

Unit Name : 325672 Investigation # :1612298 Facility Name : WEST WADDELL RANCH SAT311	County : CRANE TCEQ Investigator : HEATHER FAIRBANKS
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Item No.	Description	Answer	Comments	Due Date
1	Item 1	NON COMPLIANT	Failure to report the incident properly to the TCEQ Midland Regional Office within 24 hours after the discovery of the event under 30 TAC 101.201(a)(1) (B), the unauthorized emissions became ineligible for exemption. Incident 325672 was reviewed for compliance with the 30 Texas Administrative Code (TAC) Chapter 101 § 101.201, 101.222 (a) and (b). The incident was discovered at 02:00 on November 28, 2019; however, ConocoPhillips Company initially reported the event electronically at 19:09 on November 29, 2019, 17 hours 9 minutes late after the 24 hour deadline. This is an alleged violation of 30 TAC Chapter 101.201(a)(1)(B) which requires initial notification of a reportable emissions event within 24 hours of discovery to the Commission. This is classified as a category C-3 violation by the Enforcement Initiation Criteria (EIC) document.	01/10/2020
	Citation: 30 TAC Chapter 101, SubChapter F 101.201(a)(1)(B) 5C THSC Chapter 382 382.085(b)			
2	Item 2	NOT APPLICABLE		
3	Item 3	NOT APPLICABLE		
4	Item 4	NOT APPLICABLE		
5	Item 5	NOT APPLICABLE		
6	Item 6	NOT APPLICABLE		
7	Item 7	NOT APPLICABLE		
8	Item 8	NOT APPLICABLE		
9	Item 9	NOT APPLICABLE		
10	Item 10	NOT APPLICABLE		

11	Comments:	NOT APPLICABLE		
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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



Attachment 1 Incident & Reportable Events 12 Month Summary

BURLINGTON RESOURCES OIL & GAS COMPANY LP

WEST WADDELL RANCH SAT 311

CRANE COUNTY, TEXAS
CN602989436
RN102531571

INVESTIGATION No. 1612298
INVESTIGATOR: HEATHER FAIRBANKS
DATE: DECEMBER 6, 2019

1612298

Texas Commission on Environmental Quality Reportable Event Report

Submittal Type Incident # Incident Status Investigation # Investigation Status

FINAL 325672 OPEN

Customer Name CN #

BURLINGTON RESOURCES OIL & GAS COMPANY L CN602989436

Name of Owner or Operator RN/Air Acct # **Physical Location**

WEST WADDELL RANCH SAT311 RN102531571

Event/Activity Type **Date / Time Event Discovered or Scheduled Activity Start/End** **Duration**
EMISSIONS EVENT 11/28/2019 2:00:00AM 12/2/2019 2:00:00PM 108 hours 0 minutes

Emission Point Common Name		Emission Point Number (EPN)			
Emergency Flaring					
List of Compound Descriptive type(s) of Individually Listed or Mixtures of Air Contaminant Compounds Released, Including opacity	Estimated Total Quantity for Air Contaminants for Emissions / Opacity Value for Opacity	Units	Authorized Emissions Limit / Opacity Limit	Units	Authorization (rule or permit #)
Carbon Monoxide	1,261.00	POUNDS	0.00		Emergency Flaring - No specific emissions authorizations for this facility
Hydrogen Sulfide	150.00	POUNDS	0.00		Emergency Flaring - No specific emissions authorizations for this facility
NATURAL GAS	1,106.00	POUNDS	0.00		Emergency Flaring - No specific emissions authorizations for this facility
Nitrogen Oxides (NOx)	632.00	POUNDS	0.00		Emergency Flaring - No specific emissions authorizations for this facility
Sulfur dioxide	13,818.00	POUNDS	0.00		Emergency Flaring - No specific emissions authorizations for this facility

Facility Common Name	Facility Identification Number (FIN)
Satellite 311	

Process Unit or Area Common Name
Waddell Ranch - West

Cause of Emissions Event, Excess Opacity Event, or Reason for Scheduled Activity:

ConocoPhillips Company (COPC) had to conduct controlled flaring at Waddell WR Satellite 311 because our third party gas gatherer Targa requested some gas be shut out due to DCP booster compressor down.

Actions Taken, of Being Taken, to Minimize Emissions and/or Correct the Situation:

ConocoPhillips immediately sent the gas to sales after receiving notification from third party gas gatherer.

Basis Used to Determine Quantities and Any additional Information Necessary to Evaluate the Event:

The approximate quantities of emissions are calculated using an estimated volume of gas that was not able to go to the sales line and most current available gas analysis.

Person Making Initial Notification Charles Beauvais (575) 988-2043

Initial Notification Date/Time 2019-11-29 19:09

Method STEERS

Texas Commission on Environmental Quality Reportable Event Report

Incident Primary Contact
Jurisdiction(s) Notified

Charles Beauvais (575) 988-2043
REGION 07 - MIDLAND

Agency Comments

Assigned Staff Member: Heidi Abouzeid

Reportable Events 12 Month Summary

Date	Region	RN#	Inc#	Staff	Type	EPN Name	EPN #	FIN Name	FIN #	PCN Name		
11/28/2019	ALL	RN102531571	All	All	All	All	All	All	All	All		
RN102531571 WEST WADDELL RANCH SAT311												
Inc#	Type	Status	Staff	Start DT	End DT	Duration	Duration %	EPN Name	EPN #	FIN Name	FIN #	PCN Name
304233	EMISSIONS EVENT	CLOSED	HFAIRBAN	03/08/2019	03/09/2019	21 Hr 0 Min.	0.24%	Emergency Flaring		Satellite 311		Waddell Ranch - West
Cause: ConocoPhillips Company (COPC) had to conduct controlled flaring at Waddell WR Satellite 311 because DCP TUBINE ISSUES												
304531	EMISSIONS EVENT	CLOSED	HFAIRBAN	03/13/2019	03/13/2019	16 Hr 0 Min.	0.18%	Emergency Flaring		Satellite 311		Waddell Ranch - West
Cause: ConocoPhillips Company (COPC) had to conduct controlled flaring at Waddell WR Satellite 311 because DCP power outage												
310571	EMISSIONS EVENT	CLOSED	HFAIRBAN	06/07/2019	06/09/2019	45 Hr 0 Min.	0.51%	Emergency Flaring		Satellite 311		Waddell Ranch - West
Cause: ConocoPhillips Company (COPC) had to conduct controlled flaring at Waddell WR Satellite 311 because DCP power outage DUE TO DCP FIGHTING RESIDUE OUTLET PRESSURES												
322468	EMISSIONS EVENT	CLOSED	HFAIRBAN	10/08/2019	10/08/2019	6 Hr 0 Min.	0.07%	Emergency Flaring		Satellite 311		Waddell Ranch - West
Cause: ConocoPhillips Company (COPC) had to conduct controlled flaring at Waddell WR Satellite 311 because our third-party gas gatherer had processing problems. This report also serves as the final report.												
325469	EMISSIONS EVENT	OPEN	HABOUZEI	11/22/2019	11/23/2019	16 Hr 0 Min.	0.18%	Emergency Flaring		Satellite 311		Waddell Ranch - West
Cause: ConocoPhillips Company (COPC) had to conduct controlled flaring at Waddell WR Satellite 311 because DCP booster compressor went down.												
325672	EMISSIONS EVENT	CLOSED	HABOUZEI	11/28/2019	12/02/2019	108 Hr 0 Min.	1.23%	Emergency Flaring		Satellite 311		Waddell Ranch - West
Cause: ConocoPhillips Company (COPC) had to conduct controlled flaring at Waddell WR Satellite 311 because our third party gas gatherer Targa requested some gas be shut out due to DCP booster compressor down.												

