

Attachment #1
AIR PERMIT
FODLER LEVEL

AIR PA #: HP0495D 035262

File Type: PERMITS

Volume: 001

Inclusive Dates: ~~1/1/2003~~ 1/1/2004 - 12/31/2004

Media Code/ Form

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Box Barcode:

AIR PA / NO ACT # / PN 102570421 / 35 2 / PA

06/29/2004 ----- NSR PERMITS IMS- PROJECT RECORD -----

PROJECT#: 107682 PERMIT#: 35262 STATUS: C DISP CODE: _____
RECEIVED: 12/06/2002 PROJTYPE: XOWN RENEWAL: ISSUED DATE: _____
FEE DATE: FEE AMT: \$ 0 STDY1/SP: 0 SUP-DISP DATE: 06/30/2004
GROUP: PAR
PAR1_2 : STEGER, JULIE

ADMIN REVIEW

A - PAR RECEIVED : 12/06/2002 A - CENTRAL REGISTRY 09/15/2003
UPDATED :

ISSUED TO: CHEVRON USA INC
COMPANY NAME: CHEVRON USA INC
CUSTOMER REGISTRY ID: CN600132484

PRIMARY CONTACT INFORMATION

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MR PETER BOTES
PHONE: 432-687-7297 ext
STREET: 15 SMITH ROAD

TITLE: ENVIRONMENTAL SPECIALIST
FAX: 432-687-7660 ext
CITY/STATE, ZIP: MIDLAND, TX , 70905-

RECEIVED
AUG 26 2009
TCEQ
CENTRAL FILE ROOM

PROJECT INFORMATION

UNIT: SSU SATELLITE #1-19

SIC: 0 REGION: 2 ACCOUNT: HP0495D REG ENTITY ID: RN102570421

SITE NAME: SSU SATELLITE 1 19

COUNTY: HOCKLEY CAPUNITS: UNITTYPE:

CAPACITY: CITY: SUNDOWN

LOCATION: APPROX. 7.6 MI. S. OF SUNDOWN ON RR 303 N. ON
CR. APPROX 0.1 MI

PUBLIC NOTICE

PUBLIC NOTICE REQUIRED?: N PN1 ALT LANGUAGE: NO PN2 ALT LANGUAGE: NO

**EMISSION
RATES**

TONS/YR REDUCTION	NOX	CO	VOC	PM	SO2	OTHER	TOTAL
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PROJECT NOTES

ADMINISTRATIVE: PREVIOUS OWNER TEXACO E&P CO

TECHNICAL ACTIVITY HISTORY**PROJECT ATTRIBUTES****PROJECT LINK****PROJECTS/PERMITS VOIDANCE**

Texas Commission on Environmental Quality Reportable Activity Report

Air / HP-0495-D / RP

Submittal Type FINAL	Incident # 39153	Investigation #	
Customer Name CHEVRON USA INC	CN # CN600132484		
Name of Owner or Operator SSU SATELLITE 1 19	RN/Air Acct # RN102570421	Physical Location APPROX. 7.6 MI. S. OF SUNDOWN ON RR 303 N. ON CR. APPROX 0.1 MI	
Event/Activity Type MAINTENANCE	Date / Time Event Discovered or Scheduled Activity Start/End 05/17/2004 @ 08:00 am 05/17/2004 @ 01:00PM		Duration 5 hrs. 0 min.

Process Unit or Area Common Name
SSU Sat 1-19

RECEIVED

Facility Common Name
production separator

Facility Identification Number (FIN)
PROD. SEP.

JUN 1 2004
TCEQ - CENTRAL FILE ROOM

Emission Point Common Name
vent stack

Emission Point Number (EPN)
VENT

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 #)
Hydrogen sulfide	46.000	POUNDS	0.000		35262
Non-Methane Non-Ethane Natural Gas	940.000	POUNDS	0.000		35262

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

maint. event - will SD and tie into Oxy line - gives us other options operationally if they go down

Oxy will be shutting their line down to make a tie in that will give us a second line to the Oxy plant. Once this tie in is complete. Oxy will be able to isolate a line and repair while continuing to deliver our gas to the plant. Less upset emissions.

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

vent gas and make tie in

Due to the nature of CO2 it makes it difficult for us to shut in wells or pinch them back due to the pressure we will create on the wells. However, we are trying to coordinate our shut in with the Oxy tie in so that we only have to go down once. Tie ins were made and we were down for 5 hours only

This did not result in a reportable event

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

RQ for NMNE natural gas by definition (5000#) in regs, gas analysis, excel spreadsheet, 24 hour basis

Person Making Initial Notification
Peter Botes - (432) 687-7297

Initial Notification Date/Time
05/06/2004 08:25

Method
STEERS

Person Making Final Report
Peter Botes - (432) 687-7297

Final Report Date/Time
05/26/2004 07:25

Method
STEERS

Incident Primary Contact
Peter Botes, (432) 687-7297

Jurisdiction(s) Notified
REGION 02 - LUBBOCK

Agency Comments

Assigned Staff Member: Gary Shipp

Facility Common Name

production separator

INTRODUCTION

On June 4, 2004, an Air Upset/Maintenance Level 4 investigation (UML4) was conducted for a scheduled maintenance, startup, and shutdown (SMSS) event, incident no. 39153. The investigation evaluated compliance with 30 TAC §101.211(a), 30 TAC §101.211(b), 30 TAC §101.222(a), and 30 TAC §101.222(c).

ASSESSMENT OF COMPLIANCE WITH STATE RULES

30 TAC §101.211 - Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements

30 TAC §101.211(a) - Notification

The initial notification for this SMSS was submitted to TCEQ Lubbock regional office on May 6, 2004 @ 07:25, via STEERS. The initial notification indicated the SMSS would begin on May 17, 2004, @ 8:00, and end on May 18, 2004 @ 8:00. The RE estimated that 222 lbs. of H₂S and 4,515 lbs. of non-methane/non-ethane natural gas would be vented during the maintenance event. The SMSS was conducted so that the facility could be connected to another sales line. The additional line gives the operator another route for product in case of a pipeline failure and should reduce the likelihood of an emission event. Notice of the event was at least ten (10) days prior to the SMSS event. All required information was contained in the notice.

30 TAC §101.211(b) - Final Record

The final SMSS record / report was received via STEERS on May 26, 2004, @ 7:25. This final report met the 14 days provision specified in the reporting requirements. The record retention requirement could not be evaluated, since this investigation only evaluated records maintained in the Lubbock Regional office..

30 TAC §101.211(c) - Final Record

For any scheduled maintenance, startup, or shutdown activity for which an initial notification was submitted under subsection (a) of this section, if the information required in subsection (b) of this section differs from the information provided under subsection (a) of this section, the owner or operator of the facility shall submit a copy of the final record to the commission office for the region in which the facility is located no later than two weeks after the end of the scheduled activity.

The final SMSS record / report was received via STEERS on May 26, 2004, @ 7:25. The final record showed that only 46 lbs. of H₂S and 940 lbs. of non-methane/non-ethane natural gas was vented. In addition, the maintenance event only lasted 5 hours instead of 12 originally estimated.

30 TAC §101.222, Demonstrations

30 TAC §101.222(a) - Excessive Emission Events

The executive director shall determine when emissions events are excessive.

An Emissions event is defined as any upset event or unscheduled maintenance, startup, or shutdown activity that results in unauthorized emissions from an emissions point. The final report demonstrated that the final total estimated quantity for non-methane / non-ethane natural gas did not exceed the quantity estimated in the initial notification. This SMSS was not required to be reported as a emission event, so this requirement is not applicable.

30 TAC §101.222(b) - Non-excessive events

Emissions events determined not to be excessive are subject to an affirmative defense to all claims in enforcement actions brought against these events, other than claims for administrative technical orders and action for injunctive relief.

An Emissions event is defined as any upset event or unscheduled maintenance, startup, or shutdown activity that results in unauthorized emissions from an emissions point. Since, this is a SMSS event this is not applicable.

30 TAC §101.222(c) - Scheduled maintenance , startup, or shutdown activity

Emissions from a scheduled maintenance, startup, or shutdown activity are required to be included in a permit under Texas Health and Safety Code, §382.0518 or §382.0519, a standard permit under §382.05195, or a permit by rule under §382.05196

The RE submitted notification of the scheduled maintenance per 30 TAC §101.211(a), created a final record per 30 TAC §101.211(b), and submitted the final record to the TCEQ as required. The emissions could not have been prevented through planning and design and did not appear to be part of a recurring pattern indicative of inadequate design, operation, or maintenance. The facility is operated under Permit by Rule Registration No. 36262 and is permitted to vent gas. The operator indicated that shutting in well, or pinching back the wells is very difficult because to the pressure build up that would occur because of the CO2 used for oil recovery. The RE made the connection in five (5) hours instead of the twelve (12) hours estimated. The event did not cause a condition of air pollution.

CONCLUSION

The RE appeared to have complied with all rules and regulations for this SMSS, so no further action is warranted at this time.


Investigator

Section Manager

6-7-04
Date

6-7-2004
Date

WWW - UPSET02 - Web STEERS Air Emissions Submitted - Incident 39153

From: <steers@tceq.state.tx.us>
To: <botespj@chevrontexaco.com>
Date: 5/26/2004 7:26 AM
Subject: Web STEERS Air Emissions Submitted - Incident 39153
CC: <upset02@tceq.state.tx.us>

This confirms the submittal of your incident information to the TCEQ. You submitted a final report for Incident 39153, regulated entity RN102570421. Your submittal was received at 05/26/2004 07:25 AM.

The confirmation number for this submittal is 12588-7F4CA027C76CABBD084BE33B65F0B765. You may access the copy of record from the submit log which is available from the Home page of STEERS Internet Version 4.1.

If you have any questions please contact the STEERS Help Line at 512-239-6925 or by e-mail at steers@tceq.state.tx.us.

WWW - UPSET02 - Web STEERS Air Emission Submitted - Incident 39153

From: <steers@tceq.state.tx.us>
To: <botespj@chevrontexaco.com>
Date: 5/6/2004 8:26 AM
Subject: Web STEERS Air Emission Submitted - Incident 39153
CC: <upset02@tceq.state.tx.us>

This confirms the submittal of your incident information to the TCEQ. You submitted an initial notification for incident 39153, regulated entity RN102570421. Your submittal was received at 05/06/2004 08:25 AM.

The confirmation number for this submittal is 11799-E7374A874978E29A05E55F12974D9AD3.
You may access the copy of record from the submit log which is available from the Home page of STEERS Internet Version 4.1.

If you have any questions please contact the STEERS Help Line at 512-239-6925 or by e-mail at steers@tceq.state.tx.us.

Texas Commission on Environmental Quality

Reportable Activity Notification

Submittal Type INITIAL **Incident #** 39153 **Investigation #**

Customer Name CHEVRON USA INC **CN #** CN600132484

Name of Owner or Operator SSU SATELLITE 1 19 **RN/Air Acct #** RN102570421 **Physical Location** APPROX. 7.6 MI. S. OF SUNDOWN ON RR 303 N. ON CR. APPROX 0.1 MI

Event/Activity Type MAINTENANCE **Date / Time Event Discovered or Scheduled Activity Start/End** 05/17/2004 @ 08:00 am 05/18/2004 @ 08:00AM **Duration** 24 hrs. 0 min.

Process Unit or Area Common Name

SSU Sat 1-19

Facility Common Name

production separator

Facility Identification Number (FIN)

PROD. SEP.

Emission Point Common Name

vent stack

Emission Point Number (EPN)

VENT

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 #)
Hydrogen sulfide	222.000	POUNDS	0.000		35262
Non-Methane Non-Ethane Natural Gas	4,515.000	POUNDS	0.000		35262

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maint. event - will SD and tie into Oxy line - gives us other options operationally if they go down

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

vent gas and make tie in

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

gas analysis

Person Making Initial Notification

Peter Botes - (432) 687-7297

Initial Notification Date/Time

05/06/2004 08:25

Method

STEERS

Person Making Final Report

Peter Botes - (432) 687-7297

Final Report Date/Time

05/06/2004 08:25

Method

STEERS

Incident Primary Contact

Peter Botes, (432) 687-7297

Jurisdiction(s) Notified

REGION 02 - LUBBOCK

Agency Comments

Assigned Staff Member: Gary Shipp