VOI 2100-1py



02/12/2009 -----NSR IMS - PROJECT RECORD ---PROJECT#: 144380 PERMIT#: 72355 STATUS: PENDING DISP CODE: RECEIVED: 02/11/2009 PROJTYPE: REVISION **AUTHTYPE: PBR** ISSUED DT: - ASKED APERT IN FIX 2/18 RENEWAL: SchRick PROJECT ADMIN NAME: SHCROOK WM NO 38 INCREASED THROUGHPUT PROJECT TECH NAME: SHOKOCK WM NO 38 BATTERY STAFF ASSIGNED TO PROJECT: SUNIGA, RICHARD - REVIEWR1_2 -AP INITIAL REVIEW - REVIEW ENG -RR TEAM WURST, DONNA **CUSTOMER INFORMATION (OWNER/OPERATOR DATA)** ISSUED TO: BP AMERICA PRODUCTION COMPANY COMPANY NAME: BP AMERICA PRODUCTION COMPANY **CUSTOMER REFERENCE NUMBER: CN600129373** REGULATED ENTITY/SITE INFORMATION REGULATED ENTITY NUMBER: RN104299359 ACCOUNT: SITE NAME: SCHROCK WM 38 BATTERY 🗸 REGULATED ENTITY LOCATION: GOING S ON FM 1379 AT FM 1357 TURN I FFT & CONT 3.7 MI TURN W INTO CATTLEGUARD D & ON 0.4 MI & S 0.1 MI **NEAR CITY: MIDKIFF** COUNTY: GLASSCOCK **REGION 07 - MIDLAND CONTACT DATA** CONTACT ROLE: RESPONSIBLE OFFICIAL CONTACT NAME: MR SCOTT CARRELL JOB TITLE: AIR QUALITY SPECIALIST ORGANIZATION: BP AMERICA PRODUCTION COMPANY MAILING ADDRESS: PO BOX 3092, HOUSTON, TX, 77253-3092

PHONE: (281) 366-8431 Ext: 0 FAX: (281) 366-7945 Ext: 0

EMAIL:SCOTT.CARRELL@BP.COM

PROJECT NOTES:

RESUBMITTAL VOIDED PROJECT 139966 FEE TRANSFERRED 02/12/2009

PERMIT NOTES:

TRACKING ELEMENTS:

TE Name

Start Date Complete Date

APIRT RECEIVED PROJECT (DATE)

02/11/2009 APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE) 02/12/2009

DEFICIENCY CYCLE

ENGINEER INITIAL REVIEW COMPLETED (DATE)

PEER / MANAGER REVIEW PERIOD

Start Date

PROJECT RECEIVED BY ENGINEER (DATE)

PROJECT RULES:

Rule Desc

Request Type On Application Approve

106.352 OIL AND GAS PRODUCTION FACILITIES -

ADD

APPROVE

PERMIT RULES:

Rule Desc

End Date

106.352 06/22/2004

RECEIVED MAR 1 8 2009 TCEQ ROOM



Donna Wurst - Re: Schrock WM No. 38 Increased Throughput

From:

Donna Wurst

To:

Callihan, Alton G

Date:

3/3/2009 3:58 PM

Subject:

Re: Schrock WM No. 38 Increased Throughput

CC:

Carrell, Scott; Lowe, Margaret J

Thank you very much, sir. I know you must be very busy, so I appreciate your time.

If I need anything else, I will contact Mr. Carrell.

I must add that Mr. Carrell was extremely helpful during my review!!!

Regards......Donna

Please consider whether it is necessary to print this e-mail Donna M. Wurst Texas Commission on Environmental Quality **OPR / Rule Registrations Section** P.O. Box 13087 (MC 163) Austin, TX 78711-3087 Ph. #(512) 239-5258 Fax # (512) 239-1070

>>> "Callihan, Alton G" <alton.callihan@bp.com> 3/3/2009 3:10 PM >>>

Donna,

Pursuant to 30 TAC §106.352, BP America Production Company claimed a permit by rule (PBR) for the construction of the Schrock, WM No. 38 Battery located near Midkiff, Glasscock County, Texas. BP America Production Company received authorization for coverage for this facility under 30 TAC §106.352 in a letter from TCEQ dated June 22, 2004. BP America Production Company notified the TCEQ of increases in production at the facility from the original authorization in a letter dated February 23, 2009.

The uncontrolled potential emissions from the oil tanks are estimated to be greater than 100 tons per year of VOC. However, the oil tanks have a vapor recovery device (VRU) installed which will greatly reduce the potential emissions released to the atmosphere. Under the Texas permitting process and in previous conversations between Ann Inman (TCEQ) and Scott Carrell (BP - Air Specialist), an equipment specific APD-CERT was submitted in order to ensure the VRU reductions are federally enforceable. All other VOC emission sources at the site are at maximum capacity and therefore do not need any emission control reductions to be federally enforceable.

PBR Registration No. 72355

Increased Throughputs Schrock WM No. 38 Battery (RN104299359) Customer No. CN600129373 Midkiff, Glasscock County

Thank you,

Alton Callihan

Permian Operation Center Manager (432) 688-5535 or (432) 557-2002 alton.callihan@bp.com

Donna Wurst - Schrock WM No. 38 Increased Throughput

From:

"Callihan, Alton G" <alton.callihan@bp.com>

To:

<DWurst@tceq.state.tx.us>

Date:

3/3/2009 3:10 PM

Subject: Schrock WM No. 38 Increased Throughput

CC:

"Carrell, Scott" <Scott.Carrell@bp.com>, "Lowe, Margaret J" <margaret.lowe@bp.com>

Donna,

Pursuant to 30 TAC §106.352, BP America Production Company claimed a permit by rule (PBR) for the construction of the Schrock, WM No. 38 Battery located near Midkiff, Glasscock County, Texas. BP America Production Company received authorization for coverage for this facility under 30 TAC §106.352 in a letter from TCEQ dated June 22, 2004. BP America Production Company notified the TCEO of increases in production at the facility from the original authorization in a letter dated February 23, 2009.

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PBR Registration No. 72355

Increased Throughputs Schrock WM No. 38 Battery (RN104299359) Customer No. CN600129373 Midkiff, Glasscock County

Thank you,

Alton Callihan

Permian Operation Center Manager (432) 688-5535 or (432) 557-2002 alton.callihan@bp.com

Buddy Garcia, Chairman

Larry R. Soward, Commissioner

Bryan W. Shaw, Ph.D., Commissioner

Mark R. Vickery, P.G., Executive Director





TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 27, 2009

MR SCOTT CARRELL AIR QUALITY SPECIALIST BP AMERICA PRODUCTION COMPANY PO BOX 3092 HOUSTON TX 77253-3092

Permit by Rule Registration Number:

72355

Location/City/County:

Going south on FM 1379, at FM 1357 turn left and continue 3.7

miles, turn west into cattleguard "D" and go 0.4 mile, then south

0.1 mile, Midkiff, Glasscock County

Project Description/Unit:

Schrock WM No. 38 Increased Throughput

Regulated Entity Number:

RN104299359

Customer Reference Number:

CN600129373 Existing

New or Existing Site:

None

Affected Permit (if applicable): Renewal Date (if applicable):

None

BP America Production Company has registered the emissions associated with the Schrock Wm No. 38 Increased Throughput and certified the emissions for the oil tank vent under Title 30 Texas Administrative Code § 106.352.

For rule information see www.tceq.state.tx.us/permitting/air/nav/numerical index.html.

Planned MSS emissions for the vent used to periodically depressurize the gas gathering system to atmosphere in order to safely facilitate maintenance activities have been reviewed. These authorized MSS emissions are included on the emissions table. No other planned MSS emissions have been represented or reviewed. The company is also reminded that these facilities may be subject to and must comply with other state and federal air quality requirements.

All analytical data generated by a mobile or stationary laboratory to support the compliance with an air permit must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory. For additional information regarding the laboratory accreditation program, please see the following website which includes the accreditation and exemption information:

http://www.tceq.state.tx.us/compliance/compliance_support/qa/env_lab_accreditation.html

This certification is taken under the authority delegated by the Executive Director of the TCEQ. If you have questions, please contact Ms. Donna Wurst at (512) 239-5258.

Sincerely.

cc:

Anne M. Inman, P.E., Manager

Rule Registrations Section

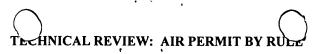
Air Permits Division

Air Section Manager, Region 7 - Midland

Project Number: 144380

Emissions

Re	egistered		Certified	MSS*	HAPs*
VOCs	24.50	tpy		6.22 tpy (VOC)	<0.01 tpy (HCHO)
SO ₂	0.05	tpy	13.77 tpy	<0.01 tpy (H ₂ S)	0.03 tpy (H ₂ S)
CO	0.18	tpy	Oil Tank Vent		
NO _x	0.21	tpy			
PM ₁₀	0.02	tpy			
* MSS, HA	Ps and Cei	rtified	emissions are inc	luded in VOC	total .



Permit No.:	72355	Company Name:	BP America Production Company	APD Reviewer:	Ms. Donna Wurst
Project No.:	144380	Unit Name:	Schrock WM No. 38 Increased Throughput	PBR No(s).:	106.352

GENERAL INFORMATI	ON		
Regulated Entity No.:	RN104299359	Project Type:	Permit by Rule Application
Customer Reference No.:	CN600129373	Date Received by TCEQ:	February 11, 2009
Account No.:	None	Date Received by Reviewer:	February 11, 2009 - Received information from applicant (hand-delivered)
		Date Received by Reviewer:	February 13, 2009 - Received project from APIRT
City/County:	Midkiff, Glasscock County	Physical Location:	Going south on FM 1379, at FM 1357 turn left and continue 3.7 miles, turn west into cattleguard "D" and go 0.4 mile, then south 0.1 mile

CONTACT INFORMATION					
Responsible Official/ Primary Contact Name and Title:	Mr. Alton G. Callihan, Permian Operations Center Manager	Phone No.: Fax No.:	(432) 688-5535 (432) 688-5246	Email:	alton.callihan@bp.com
Technical Contact/ Consultant Name and Title:	Mr. Scott Carrell Air Quality Specialist	Phone No.: Cell Phone No.: Fax No.:	(281) 366-8431 (832) 472-7158 (281) 366-7945	Email:	scott.carrell@bp.com

GENERAL RULES CHECK	YES	NO	COMMENTS
Is confidential information included in the application?		Х	
Are there affected NSR or Title V permits for the project?		Х	PBR Registration No. 72355 (This is a revision)
			There are no permits for this site and no pending permits for this operation. The site is represented as being below the major source thresholds and will not require a Title V Operating Permit.
Is each PBR > 25/250 tpy?		Х	
Are PBR sitewide emissions > 25/250 tpy?	ŀ	Х	
Are there permit limits on using PBRs at the site?		Х	
Is PSD or Nonattainment netting required?		х	This site is not one of the 28 PSD named sources and this project's emissions are represented as being below the PSD major source threshold.
116.111(a)(2)(l) - Prevention of Significant Deterioration (PSD) Review			This site is located in an attainment county (Glasscock County). NOx and
116.111(a)(2)(H) - Non-attainment Review			VOC emissions are represented as being below the major source definition. Therefore, PSD and Nonattainment netting are not required.
Do NSPS, NESHAP, or MACT standards apply to this registration?		Х	None represented
Does NOx Cap and Trade apply to this registration?		Х	Site is not in the Houston/Galveston/Brazoria nonattainment area.
Is the facility in compliance with all other applicable rules and regulations?	Х		

DESCRIBE OVERALL PROCESS AT THE SITE

Pursuant to 30 TAC §106.352, BP America Production Company (BP) claimed a PBR for the construction of the Schrock WM No. 38 Battery located near Midkiff, Glasscock County, Texas. BP received authorization this facility under 30 TAC §106.352 in a letter from TCEQ dated June 22, 2004. The site does not handle sour gas.

BP notified TCEQ of increases in oil and water throughputs at the facility in a letter dated July 23, 2008. After reviewing the revision application, BP was issued a deficiency letter on September 12, 2008. BP is now responding to that deficiency letter, which includes the items found deficient in the last submittal.

- Flow diagram was provided for the equipment and emission points
- Blowdown tank information was provided
- H2S emissions have been estimated for fugitive emission estimates
- H2S emissions have been included in the E&P Tank runs
- H2S sample information for the oil is sampled by field personnel upon request. The oil sampling company does not test for H2S due to their equipment limitations. The sample is tested separately, and H2S mole percent is normalized into the final oil output.

DESCRIBE PROJECT AND INVOLVED PROCESS

Produced fluids and gas from wells is sent via pumping units and flow lines into the onsite Schrock 38 Battery. Production is routed through a vertical 2-phase separator where gas is stripped and sent to sales, and emulsion is pumped to a free water knockout separator where water is separated from the oil. There are currently two 500 bbl oil and two 500 bbl water tanks on site. Water is sent to the saltwater disposal (SWD) storage on location, while oil is sent to the heater/treater for removal of any remaining water/gas. Gas from the heater is sent to sales. Oil is collected and stored onsite until it is sold by LACT unit. The emissions from the oil and water tanks are controlled by VRU, which assumes a conservative 99.9 percent control efficiency. The VRU pushes the recovered flash gas to an existing low-pressure line. Permian is an older established (mature) field with many low-pressure gas lines to tap into. Water is disposed of by pumping to one of two SWD wells. A vent is used to periodically depressurize the gas gathering system to atmosphere in order to safely facilitate maintenance activities. The amount of gas released will vary depending on the distance between the nearest shutoff valves in the pipeline, inside diameter of the pipes, and pressure and temperature that day. However, the gas release is not expected to exceed 290,000 scf/day and result in much less than the 0.27 lb/hr limit authorized in 30 TAC 106.352(4) for a 20 ft. emission stack.

TECHNICAL REVIEW: AIR PERMIT BY RULE

Permit No.:	72355	Company Name:	BP America Production Company	APD Reviewer:	Ms. Donna Wurst
Project No.:	144380	Unit Name:	Schrock WM No. 38 Increased Throughput	PBR No(s).:	106.352

OIL AND GAS FACILITY GENERAL INFO	ORMATION					
Natural Gas Throughput (MMSCF/day):	0.290	H ₂ S Content of Inlet Gas:	0.01180 mol% / 118 ppm / 0.016 wt%			
Oil Throughput (bbl/day):	200	Is the gas sweet or sour?	SOUR			
Condensate Throughput (bbl/day):		Is this an existing site?	Yes			
Produced Water Throughput (bbl/day):	1,250	Has the site been registered before?	Yes			

EQUIPMENT/PRO	CESSES AT SITE	igi shi e t		HE TENNESS	aj daj de dias Kiestinia a	
Number of each:	Compressor Engines:	-	Glycol dehydrators:	-	VRU:	1
	Separators:	1 .	Amine units:		Freewater Knock Out:	1
gody Vedo Ser V	Storage Tanks:	4	Heater Treaters:	1	Blowdown Tank/Vent:	1
	Truck Loading:	-	Flares:		Other:	

STORAGE TANKS							
Tank Identifier (EPN)	Capacity of Tank	Throughput (bbl/day)	Contents of Tank	Working and breathing Loss Calculation Method	Flash Loss Calculation Method	Other	
Oil Tanks (2)	500 ьы	200	Oil	E&P Tanks	E&P Tanks		
Produced Water Tanks (2)	500 bbl	1,250	Produced Water		*		

^{*} Emissions from water tanks were calculated using an emission factor (925 lb VOC/MMgal produced) from "Technical Guidance Document to the Criteria & Guideline regulations for AB 2588: Air Toxics Hot Spots Information and Assessment Act of 1987. Emission factor used in BID for MACT (unpublished).

 Source Information
 For Produced Water

 Tank Type
 Fixed Roof

 Daily Throughput (site)
 1,250 bbl/day

 Monthly Throughput (site)
 38,021 bbl/month

 52,500 gal/day

 Emission Factor**
 925 lb VOC/MMgal produced

 Control for fixed roof tank**
 85%

Emission Rate

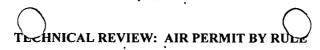
Pollutant	avg lb/hr	max lb/hr	tpy
VOC	0.3035	1.2141	1.3294

Note: Vapors from Produced Water Tanks are also captured by VRU. However, no VOC reduction credits are being claimed.

	Knowi	separator Strea	m: Low P	ressure Oil		Laboratory Analyses Low Pressure Liquid Sample submitted (if yes,		Low Pressure Liquid Sample		YES, 11/20/2008	
	(Calculation Metho	d: AP-42	AP-42		include date): High Pressure Liquid Sample		date): High Pressure Liquid Sample		n/a	
Analyses fron	Actual site or l	Representative Si		entative #37 Tank Battery)							
If not from	actual, explain	why representati		ne 37 is a sister factorize. The pressurize						pay zone, a	nd operate at simil
Tank Identifier (EPN)	Separator Pressure (psig)	Separator Temperature (°F)	Ambient Pressure (psia)	Ambient Temperature (°F)	C10+ MW	C10+ SG	Produc Rat (bbl/d	e	API Gravity (°API)	RVP (psia)	Emissions Uncontrolled VOC, C3+ (ton/yr)
			13.282	63.30	252.33	0.7820	200				

^{*} Emissions controlled by a VRU, resulting in emissions of 13.61 tpy.

^{**}From "Technical Guidance Document to the Criteria & Guideline regulations for AB 2588: Air Toxics Hot Spots Information and Assessment Act of 1987. Emissions factors used in BID for MACT (unpublished)"



Permit No.:	72355	Company Name:	BP America Production Company	APD Reviewer:	Ms. Donna Wurst
Project No.:	144380	Unit Name:	Schrock WM No. 38 Increased Throughput	PBR No(s).:	106.352

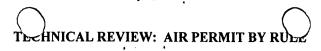
VAPOR RECOVERY UNIT (VRU)							
What equipment/emissions are controlled by the VRU?	Oil tanks (2) Water tanks (2) are also captured by VRU. However, no VOC reduction credits are being claimed.						
Where are vapors routed?	Vapors are routed to an existing low-pressure line						
Control efficiency claimed?	Claim operations for 8,016 hours per year, during this time 99.9% control efficiency achieved. For 744 hours per year, VRU will be shut down for activities such as sensor replacement, weight adjustments, power outages, and Enardo valve (for pressure relief) maintenance. The resulting net control efficiency is therefore ~91.5%.						
Justification if more than 95% control efficiency claimed:	The VRU pushes the recovered flash gas to an existing low-pressure line. Permian is an older established (mature) field with many low-pressure gas lines to tap into.						

	Valves	Flanges	Connectors	Relief Valve	Pump	Other		OC content of eam (weight %)		al Annual missions (tpy)
Gas Service Component Count	10	5	151	3		7	1	15 wt% VOC 161 wt% H2S)		1 VOC 26 H2S
Liquid Service Component Count	66	5	300		1	3		wt% VOC 118 wt% H2S)		0 VOC 03 H2S
If VOC content of gas stream <100 or other laboratory gas analys		YES	Date of 6 Sample:		VOC content fr b analysis (wt		wt%	H ₂ S content lab analysis (w		0.016 wt%

^{*} Note for H2S content - Company claims that adjustment was made for field H2S.

NATURAL GAS FIRED HEATERS AND BOILERS (INCLUDING GLYCOL DEHYDRATOR REBOILERS)								
Identifier (EPN)	Rating (MMBtu/hr)	Operating Hours per year	Fuel Heat Value (Btu/SCF)	NOx emissions Factor Used				
Heater Treater	0.5 MMBtu/hr	8,760	1,020	100.0 (based on AP-42)				

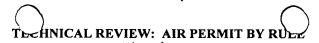
30 TAC §106.352 RULE CHECK				
REQUIREMENTS	YES, NO, or n/a	OTHER / COMMENTS		
If the site conditions the natural gas (with a glycol dehydrator, amine unit, sulfur recovery unit, etc.), it handles less than two long tons per day of sulfur compounds (1 long ton = 2240 pounds).	YES	Company claims: Sulfur = 0.000013 long tons/day and 0.0012 lbs/hr		
(1) All compressors will meet the requirements of 106.512.	n/a	No compressors		
(1) All flares will meet the requirements of 106.492.	n/a	No flares		
(2) Total emissions, including process fugitives, combustion unit stacks, separator, or other process vents, tank vents, and loading emissions from all such facilities constructed at a site under this section, will be equal to or below 25 tons per year (tpy) each of sulfur dioxide (SO ₂), all other sulfur compounds combined, or all volatile organic compounds (VOC) combined; and 250 tpy each of nitrogen oxide and carbon monoxide. Emissions of VOC and sulfur compounds other than SO ₂ must include gas lost by equilibrium flash as well as gas lost by conventional evaporation.	YES			
(3) If the facility handles sour gas, it will be located at least 1/4 mile from any recreational area or residence or other structure not occupied or used solely by the owner or operator of the facility or the owner of the property upon which the facility is located.	YES	Actual Distance =		
(4) Total emissions of sulfur compounds, excluding sulfur oxides, from all vents will be equal to or below 4.0 pounds per hour (lb/hr).	YES	Company claims: Actual Sulfur Emissions = 0.13 lb/hr.		
(4) The height of each vent emitting sulfur compounds meets the following requirements, and is in no case less than 20 feet: (NOTE: other values may be interpolated) H ₂ S (lb/hr) Minimum Vent Height (ft) 0.27 20 0.60 30 1.94 50 3.00 60 4.00 68	YES	Actual Vent Height = 20 feet. The common tank vent is assumed to emit H2S since a sample collected indicated the presence of H2S in the gas analysis. The common tank vent is 20 feet tall. The blow down vent height is also at least 20 feet above grade. The gas release is not expected to exceed 290,000 scf/day and result in much less than the 0.27 lb/hr limit authorized in 30 TAC 106.352(4) for a 20 ft. emission stack.		



Permit No.:	72355	Company Name:	BP America Production Company	APD Reviewer:	Ms. Donna Wurst
Project No.:	144380	Unit Name:	Schrock WM No. 38 Increased Throughput	PBR No(s).:	106.352

	-	
(5) If the site handles sour gas, the company will register the site by submitting Form PI-7 or PI-	YES	A Form PI-7-CERT was submitted.
7-CERT before operations begin.		

	UNICATION Time		Subject of Communication			
Date		Name/Company	Subject of Communication	·-		
2/5/09	7:55 AM	Mr. Scott Carrell Air Quality Specialist	Applicant emailed reviewer asking to meet personally on 2/11/09 to discuss application since ap would be attending the "TCEQ - Emissions Inventory Workshop" on 2/10/09.	plicant		
2/5/09	9:38 AM	Mr. Scott Carrell Air Quality Specialist	Reviewer emailed applicant stating that reviewer able to meet on 2/11/09, but asked what time ap would like to meet. Reviewer added that reviewer had team meeting from 10:00 - 12:00.			
2/5/09	12:32 PM	Mr. Scott Carrell Air Quality Specialist	Applicant emailed reviewer asking if available to meet on 2/11/09 from 8:00 - 9:00.			
2/5/09	12:37 PM	Mr. Scott Carrell Air Quality Specialist	Reviewer emailed applicant stating that reviewer able to meet on 2/11/09 from 8:00 - 9:00, but add reviewer's work leader, Mr. Monico Banda, would also be present. Reviewer stated, since Mr. Boil and gas expert and reviewer is still somewhat new to oil and gas projects, reviewer wanted Mr. present during meeting to ensure that Air Permits provided best customer service.	anda is		
2/11/09	8:00 AM	Mr. Scott Carrell Air Quality Specialist	Reviewer and Mr. Banda met with applicant to discuss project (i.e. deficiencies from last project revised application). Applicant went over entire process, calculations, etc. Applicant stated that CERT would be sent from company's Midland, TX location by Friday, February 13, 2009.			
		Mr. Monico Banda Work Leader and Oil & Gas Expert	After meeting, reviewer took application to APIRT to create new project number.			
		tial review during meeting with applicant om APIRT. Reviewer was not in the offi	and work leader on 2/11/09, but reviewer put initial review date as 2/13/09 since that was date that rece on 2/13/09 or 2/16/09.	viewer		
2/12/09	9:16 AM	Mr. Richard Suniga / APIRT	Mr. Suniga requested revised PI-7 from applicant via email.			
2/16/09	12:50 PM	Mr. Scott Carrell Air Quality Specialist Copy to: Mr. Richard Suniga / APIRT	Applicant emailed revised PI-7 to Mr. Suniga in APIRT and copied rev Applicant added, per previous discussion, APD-CERT would be ma from company's Midland, TX location, and would be sent to ensur	iled in		
		Copy to: Wr. Richard Sunigu / Al IRI	emission limit for VOC is federally enforceable.			
2/16/09	Not known	Mr. Richard Suniga / APIRT	Mr. Suniga provided hard copy of revised PI-7 to reviewer.			
2/17/09	10:50 AM	Mr. Scott Carrell Air Quality Specialist	Reviewer emailed applicant asking if information could be sent electro since would expedite PBR review by reviewer being able to copy/past applicant's documentation into technical review.			
2/17/09	11:38 AM	Mr. Scott Carrell Air Quality Specialist	Applicant emailed files so reviewer could copy/paste from appl documentation into technical review, thereby expediting review.	cant's		
2/18/09	11:12 AM 11:31 AM	Mr. Richard Suniga / APIRT	11:12 AM - Reviewer asked that Mr. Suniga correct name from 'Shore 'Schrock' in IMS.	ck' to		
			11:31 AM - Mr. Suniga corrected 'Shcrock' to 'Schrock' in IMS.			
2/18/09	2:43 PM	Mr. Scott Carrell Air Quality Specialist	Applicant emailed reviewer copy of ADP-CERT and noted that Mr. Ca BP Permian Operations Center Manager, had just signed the form to mal emissions federally enforceable. Applicant added that hard copy with o signature would be mailed tomorrow.	ke tank		
2/26/09	11:46 AM	Mr. Scott Carrell Air Quality Specialist	Reviewer left voice mail message for applicant asking why sample take representative site (Lane #37 Tank Battery) instead of Schrock WM No. and where vapors from the VRU go.			
2/26/09	1:18 PM	Mr. Scott Carrell Air Quality Specialist	Reviewer sent email to applicant asking why sample taken from represe site (Lane #37 Tank Battery) instead of Schrock WM No. 38 site and vapors from the VRU go.			
2/26/09	1:34 PM	Mr. Scott Carrell Air Quality Specialist	Applicant stated applicant in training, and cannot answer by phone righ The Lane 37 is a sister facility that handles gas/oil from the same underg pay zone, and operate at similar pressures. The pressurized oil is anticip be the same speciation. The VRU pushes the recovered flash gas to an elow-pressure line. Permian is an older established (mature) field with low-pressure gas lines to tap into.	ground ated to xisting		
2/27/09	9:00 AM	Mr. Scott Carrell Air Quality Specialist	Ms. Johnson contacted applicant along with reviewer to ask about certificates at site. It was decided that it was alright to only certify VOC emissions APD-CERT) from oil tank vent since all other VOC emission sources	(using are at		
		Ms. Dana Johnson / Permit Reviewer	maximum capacity. Applicant indicated applicant had received guidance. Ms. Anne Inman concerning this.	e from		



Permit No.:	72355	Company Name:	BP America Production Company	APD Reviewer:	Ms. Donna Wurst
Project No.:	144380	Unit Name:	Schrock WM No. 38 Increased Throughput	PBR No(s).:	106.352

2/27/09	9:39 AM	Mr. Scott Carrell Air Quality Specialist	Contacted applicant via email to ask that company put in writing what Ms. Johnson and applicant discussed Friday around 9:00 concerning certification (APD-CERT) for oil tank vent at Schrock WM No. 38 site.
	:	Copies to: Ms. Dana Johnson / Permit Reviewer Mr. Alton G. Callihan, Permian Operations Center Manager	Ex: BP is only certifying VOC emissions (using APD-CERT) from oil tank vent since all other VOC emission sources are at maximum capacity. Add that this was discussed this with Ms. Anne Inman in past and had received guidance.
			Reviewer added that reviewer could proceed with review for now based on applicant's verbal representation, but reviewer was instructed by Ms. Inman to get something in writing from company's responsible official.
			Reviewer asked that applicant make sure that Mr. Callihan is one who sends email since Mr. Callihan is individual who signed APD-CERT.

ESTIMATED EMISSIONS														
EPN / Emission Source	H	2S	voc		NOx		СО		PM ₁₀		SO ₂		нсно	
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/br	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
Heater Treater			0.0027	0.0118	0.0490	0.2147	0.0412	0.1804	0.0037	0.0163	0.0109	0.0478	0.00004	0.0002
(0.5 MMBtu/hr)														
Blow Down Tank (Vent)*	0.1300	0.0026	310.93	6.2186		_								-
Oil Tank(s)**	0.0863	0.0233	8.1070	13.7662										
Produced Water Tank(s)			1.2141	1.3294										
Fugitives (Gas & Liquid)***	0.0001	0.0001	0.7238	3.1701								<u> </u>		
TOTAL EMISSIONS (TPY):		0.03		24.50	7	0.21		0.18		0.02		0.05		<0.01
MAXIMUM OPERATING SCHEDULE:				ours/Day	24	Da	ys/Week	7	We	eks/Year	52	Ho	urs/Year	8,760

* Venting days: 40 hrs/yr Total volume of gas vented: 290,000 scf/day

H2S concentration: 118 ppm H2S Calculated Molecular Weight of Gas: 25.038

** Working/Breathing and Flash

*** Gas Service Fugitives = 0.62 tpy / Liquid Service Fugitives = 2.55 tpy (Total is 3.17)

Note: Lube oil emissions are negligible- vp < 0.1 mmHg

Loading is performed by a 100% efficient LACT unit.

VRU recovery efficiency is estimated to be 99.9%

SITE REVIEW / DISTANCE LIMIT	Yes	No	Description/Outcome	Date	Reviewed by
Site Review Required?		X	N/A	February 18, 2009	Ms. Donna Wurst
PBR Distance Limits Met?	Х		Distance to the nearest off-site receptor is 5,280 feet (1 mile).	February 18, 2009	Ms. Donna Wurst

	TECHNICAL REVIEWER	PEER REVIEWER	FINAL REVIEWER
SIGNATURE:	Donna M. Want	Find Page	Stephen Copy.
PRINTED NAME:	Ms. Donna Wurst	Ms. Jennifer Pfeil	Ms. Anne M. Inman, P.E., Manager
DATE:	February 27, 2009	February 27, 2009	February 27, 2009

BASIS OF PROJECT POINTS	POINTS
Base Points: PBR 106.352	2.00
Project Complexity Description and Points:	
Communication / Meetings	2.75
Technical Reviewer Project Points Assessment:	4.75
Final Reviewer Project Points Confirmation:	

2/27/2009	NSR IMS - PROJECT R	ECORD	
PROJECT#: 144380 RECEIVED: 02/11/2009 RENEWAL:	PERMIT#: 72355 PROJTYPE: REVISION	STATUS: PENDING AUTHTYPE: PBR	DISP CODE:
PROJECT ADMIN NAME:			
PROJECT TECH NAME: 8 STAFF ASSIGNED TO PR	SCHROCK WM NO. 38 INCRE	EASED THROUGHPUT	
SUNIGA , RICHARD	- REVIEWR1_2 -	AP INITIAL REV	1EW
WURST, DONNA	- REVIEW ENG -		
	ON (OWNER/OPERATOR DA	iTA)	
	A PRODUCTION COMPANY IERICA PRODUCTION COMP	AANV	
	E NUMBER: CN600129373	-VIA I	
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REGULATED ENTITY/SIT			4.000 U.T
REGULATED ENTITY NU SITE NAME: SCHROCK V			ACCOUNT:
OTTE RESIDE. DOT INCOM V	WW GO BATTER!		
REGULATED ENTITY LO CATTLEGUARD D & ON (79 AT FM 1357 TURN LEF	T & CONT 3.7 MI TURN W INTO
REGION 07 - MIDLAND	NEAR CITY: MIDI	KIFF COUNT	TY: GLASSCOCK
CONTACT DATA			
0017407 1445 45 000	OTT 04 DOEL	T DOI 5: DESBOUGHT 5	2550111
CONTACT NAME: MR SC JOB TITLE: AIR QUALITY		CT ROLE: RESPONSIBLE C ZATION: BP AMERICA PRO	
	BOX 3092 , HOUSTON, TX, 7		ODUCTION COMPANT
PHONE: (281) 366-8431 E		7253-3092	
FAX: (281) 366-7945 Ext.			
EMAIL:SCOTT.CARRELL	@BP.COM		
200 1507 110770			
PROJECT NOTES:	HTTAL MOIDED DDO JECT 42	OOS EEE TOANGEEDDED	
02/12/2009 RESUBM PERMIT NOTES:	IITTAL VOIDED PROJECT 13	3300 FEE TRANSFERRED	
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	PROJECT TO TECHNICAL S /IEW COMPLETED (DATE)	02/13/200	
PROJECT RECEIVED B		02/13/200	
PEER / MANAGER REV	•	02/27/200	
	-		
UNIT TYPES:			
Project Unit Type:			
	ndustry Type Source Ty	pe Control/BACT Type	e Request Authorization
CHEMICAL C	OIL AND GAS		
PROJECT RULES:			
Rule Desc		Personal Time On Ar	unlication Annual /
	PRODUCTION FACILITIES -	Request Type On Ap ADD	oplication Approve Y APPROVE
PERMIT RULES:			
Rule Desc Start Date	End Date		
108.352 06/22/200			
PROJECT ATTRIBUTES:			
	Value		
_	TANK VOC <100 TPY		
	(E)		
PROJECT POINT			=





Donna Wurst - Schrock WM No. 38 Increased Throughput

From:

Donna Wurst

To:

Carrell, Scott

Date:

2/27/2009 9:39 AM

Subject: Schrock WM No. 38 Increased Throughput

CC:

alton.callihan@bp.com; Johnson, Dana

Mr. Carrell,

Would you please put in writing what Dana Johnson and you discussed Friday around 9:00 concerning the certification (APD-CERT) for the oil tank vent at the Schrock WM No. 38 site?

Ex:

BP is only certifying VOC emissions (using APD-CERT) from the oil tank vent since all other VOC emission sources are at maximum capacity.

Please add that you have discussed this with Ms. Anne Inman in the past and had received guidance.

I can proceed with my review for now based on your verbal representation, but was instructed by Ms. Inman to get something in writing from the company's responsible official.

Please make sure that Mr. Callihan is the one who sends the email since he is the individual who signed the APD-CERT.

I am copying Ms. Johnson on this email just in case I have left out important details, or have not made my request clear.

Thanks very much for your time and patience Donna

Please consider whether it is necessary to print this e-mail Donna M. Wurst Texas Commission on Environmental Quality OPR / Rule Registrations Section P.O. Box 13087 (MC 163) Austin, TX 78711-3087 Ph. #(512) 239-5258 Fax # (512) 239-1070

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02/26/2009	NSR IMS - PROJECT R	RECORD	
	PERMIT#: 72355 PROJTYPE: REVISION	- · · · · · · · · - · · · · · · · ·	DISP CODE:
PROJECT ADMIN NAME: S PROJECT TECH NAME: S STAFF ASSIGNED TO PR	CHROCK WM NO. 38 INCRI	EASED THROUGHPUT	
		AP INITIAL REVIE	EW .
ISSUED TO: BP AMERICA	ON (OWNER/OPERATOR DA PRODUCTION COMPANY ERICA PRODUCTION COMP NUMBER: CN600129373		
REGULATED ENTITY/SITI REGULATED ENTITY NUN SITE NAME: SCHROCK W	IBER: RN104299359	ACCOU	NT:
REGULATED ENTITY LOC CATTLEGUARD D & ON 0.		379 AT FM 1357 TURN LEFT	& CONT 3.7 MI TURN W INTO
REGION 07 - MIDLAND	NEAR CITY: MIDI	KIFF COUNTY	: GLASSCOCK
CONTACT DATA	•		
CONTACT NAME: MR SCO	OTT CARRELL CONTAC	CT ROLE: RESPONSIBLE OF	FICIAL
JOB TITLE: AIR QUALITY :	SPECIALIST ORGANI	ZATION: BP AMERICA PRO	DUCTION COMPANY
MAILING ADDRESS: PO B	OX 3092 , HOUSTON, TX, 7	7253-3092	
PHONE: (281) 366-8431 Ex	d: 0		
FAX: (281) 366-7945 Ext: 0 EMAIL:SCOTT.CARRELL@			
	JUN JOHN		
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- 02/12/2009 RESUBMI PERMIT NOTES:	TTAL VOIDED PROJECT 13	9966 FEE TRANSFERRED	
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	PROJECT TO TECHNICAL S		
	EW COMPLETED (DATE)	02/13/2009	
PROJECT RECEIVED BY		02/13/2009	
DEFICIENCY CYCLE			
PEER / MANAGER REVIE	EW PERIOD		
UNIT TYPES:			
Project Unit Type:			
COLUMN TO SERVICE TO S			

PROJECT RULES:

Rule Desc

Request Type On Application

n Approve

106.352 OIL AND GAS PRODUCTION FACILITIES -

ADD Y

APPROVE

PERMIT RULES:

Rule Desc Start Date

End Date

106.352 06/22/2004

PROJECT ATTRIBUTES:

Attributes

Value

CERT_APD

TANK VOC <100 TPY

PROJECT POINT

bp





BP America Production Company 501 WestLake Park Boulevard Houston TX 77079

P.O. Box 3092 M/S 2.102B Houston TX 77253-3092

February 23, 2009

Texas Commission on Environmental Quality Permits Administrative Review Section, MC 161 P. O. Box 13087 Austin, Texas 78711-3087

CERTIFIED MAIL 7006 0100 0005 8603 2671

AIR PERMITS DIVISION
FEB 2 5 2009

Re: APD-CERT Submittal for the Update PBR Registration No. 72355

Increased Throughputs

Schrock WM No. 38 Battery (RN104299359)

Customer No. CN600129373 Midkiff, Glasscock County

Dear Sir or Madam:

BP America Production Company claimed a permit by rule (PBR) for the construction of the Schrock, WM No. 38 Battery located near Midkiff, Glasscock County, Texas. The following APD-CERT submittal is to make the emissions from the oil tanks federally enforceable to below the 100 ton per year Title V threshold for volatile organic compounds (VOC). Please attach the APD-CERT to the PBR registration 72355 project.

A copy of this PBR package is being sent to the TCEQ regional office in Midland. If you have any questions regarding this registration, please contact me at (281) 366-8431.

Sincerely,

Scott Carrell

Scott Carrell
Air Quality Specialist

CC: Ms. Alice Cone, Regional Air Section Manager CERTIFIED MAIL 7006 0100 0005 8603 2695

TCEQ, Region 7

3300 N. A St., Bldg. 4-107 Midland, TX 79705-5451

Ms. Margaret Lowe, BP Permian Asset



Texas Commission on Environmental Quality Form APD - CERT Certification of Emission Limits (Page 1)

L Company and Site In								
Company and Site in	formation							
A. Company Name:	BP America Proc		ompany	-1		_		
B. Responsible Official Name				Responsible Offi	icial's Title:	Permi	an O	C Manager
Mailing Address:	600 N Marienfeld		25111	la.		Ta: 0 1		
City:	Midland	County:	Midland	State:	TX	Zip Code	: 79	9701
Telephone No.: C. Site Name:	432-688-5535		432-688-5246	E-mail Address:	alton.callihan@t	pp.com		
Street Address: (if different	Schrock WM No.	. 38			.			
If "NO," street address desc		nn with dri	ving directions:					
From Hwy 158 at FM 137			•	mi, turn W into ca	attleguard "D" & c	n 0.4 mi. d	& S 0.	1 mi
•	, 6			,		,		
City or nearest city:	Midkiff	-		County:	Glasscock	Zip Code	:	79755
D. TCEQ Account Identification	on Number (leave bi	lank if unk	nown):	· ' · · · · · · · · · · · · · · · · · · 		<u> </u>		
E. TCEQ Customer Reference	Number (leave blan	nk if unkno	own):	CN600129373				
TCEQ Regulated Entity Nu	mber (leave blank ij	(unknown)):	RN104299359				
F. Does the site have a Title V	Permit?					YES	X	NO
G. Title V Permit Number;								
H. Is this a small business?						YES	X	NO
II. Attach the Following	Documentations							
A. Copies of a previously com	pleted Form PI-7 or	Form PI-1:	S and all supportin	g documentation.		X		
B. A list of each source of air of	missions at the site.		X					
C. A summary of the certified	emission rates.	X						
D. A process description.	X							
III — Maintain Records Or	Site to Demonstr	ate Conti	nuing Complian	ce and Make the l	Records Available	on Reque	st	
IV. Purpose of this Certi	ication (choose an	d complet	e all that are ann	ropriate)				
This certification is intended to					triggers for	<u></u>		<u></u>
X 30 TAC § 106.4 for Permits				Permit by Rule N		352		
HR VOC Emissions Cap an	*		-		ng and Trading Pro		than	HRVOC)
30 TAC § 115 for Volatile	-	s	-	-	r Nitrogen Oxides	•		
40 CFR Part 60, Subpart	•		-	40 CFR Part 61,	Subpart			
40 CFR Part 63, Subpart		_	-	Title V Permit M	lajor Source Applica	bility		_
Standard Permit:		-	-	_	• ••	•		
				Other:				
	witch this Cartifica	+ion		Other:				
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Reminder: The original of this certification must be sent to the TCEQ in Austin and copies sent to the appropriate TCEQ Regional office and any local air pollution control programs with jurisdiction. A copy must also be maintained on site or, for sites that normally operate unattended, at an office within Texas having day-to-day operational control of the site.



Texas Commission on Environmental Quality Form APD-CERT Certification of Emission Limits (Page 2)

			Emi	ssion Rate Data					
FIN	Facility Name	EPN	Point Name	Authorization Type	Authorization Date	Permit or Registration Number (if applicable)	Air Contaminant Name	Maximum Emission Pounds/	Rates Tons/
SCHRTK01	Oil Tank	SCHRTK01	Oil Tank Vent	PBR 106.352	2/16/2009	72355	voc	Hour N/A	Year 13.77
		•							
:									
Emissions Tota	is: (tons/year)	VOC = 13.77	NOx =	CO =	PM =	SO2 =	Other =		

Attach additional pages if needed

"Carrell, Scott" <Scott.Carrell@bp.com>

To:

"Donna Wurst" < DWurst@tceq.state.tx.us>

CC:

"Scott Carrell" <Scott.Carrell@bp.com>

Date:

2/26/2009 1:34 PM

Subject:

RE: Schrock WM No. 38 site

I am in training, and cannot answer by phone right now. The Lane 37 is a sister facility that handles gas/oil from the same underground pay zone, and operate at similar pressures. The pressurized oil is anticipated to be the same speciation. The VRU pushes the recovered flash gas to an existing low pressure line. Permian is an older established (mature) field with many low pressure gas lines to tap in to.

Scott Carrell 832.472.7158

----Original Message----

From: "Donna Wurst" < DWurst@tceq.state.tx.us> To: "scott.carrell@bp.com" <scott.carrell@bp.com>

Sent: 02/26/09 1:19 PM

Subject: Schrock WM No. 38 site

Mr. Carrell,

I left you a voice mail message earlier, but thought I would also send an email.

Can you tell me again:

Why was the sample taken from a representative site (Lane #37 Tank Battery) instead of at the Schrock WM No. 38 site?

Where do the vapors from the VRU go?

I think that is all that I need. I apologize for not taking better notes from our meeting.

Donna

PPlease consider whether it is necessary to print this e-mail Donna M. Wurst Texas Commission on Environmental Quality OPR / Rule Registrations Section P.O. Box 13087 (MC 163) Austin, TX 78711-3087 Ph. #(512) 239-5258 Fax # (512) 239-1070





Donna Wurst

To:

scott.carrell@bp.com

Date:

2/26/2009 1:18 PM

Subject:

Schrock WM No. 38 site

Mr. Carrell,

I left you a voice mail message earlier, but thought I would also send an email.

Can you tell me again:

Why was the sample taken from a representative site (Lane #37 Tank Battery) instead of at the Schrock WM No. 38 site?

Where do the vapors from the VRU go?

I think that is all that I need. I apologize for not taking better notes from our meeting.

Donna

Please consider whether it is necessary to print this e-mail Donna M. Wurst
Texas Commission on Environmental Quality
OPR / Rule Registrations Section
P.O. Box 13087 (MC 163)
Austin, TX 78711-3087
Ph. #(512) 239-5258
Fax # (512) 239-1070



"Carrell, Scott" <Scott.Carrell@bp.com>

To:

"Donna Wurst" < DWurst@tceq.state.tx.us>

Date:

2/18/2009 2:43 PM

Subject:

RE: BP Schrock WM No. 38 Registration

CC:

"Lowe, Margaret J" <margaret.lowe@bp.com>

Attachments: Schrock APDCERT 2009 02 18.PDF

Donna,

Mr. Callihan, BP Permian Operations Center Manager, has just signed the APD-CERT to make the tank emissions federally enforceable. I will be mailing in the paper copy with the original signature tomorrow. Please see the attached document.

Thanks. Scott Carrell

501 Westlake Park Bld, Ste. 2.102B

Houston, Texas 77079 Direct: (281) 366-8431 Mobile: (832) 472-7158 (281) 366-7945 Fax: Scott.Carrell@bp.com

Note: This email and attachments are confidential and may be subject of legal privilege. If you are not the intended recipient please return this email and destroy this message. You are not permitted to copy, disclose, or use the content in any way.

From: Donna Wurst [mailto:DWurst@tceq.state.tx.us]

Sent: Tuesday, February 17, 2009 11:52 AM

To: Carrell, Scott

Subject: Re: BP Schrock WM No. 38 Registration

Mr. Carrell,

I can't thank you enough.

You are awesome.

I hope you are having a wonderful day Donna

>>> "Carrell, Scott" Scott.Carrell@bp.com> 2/17/2009 11:37 AM >>

Please see the attached pdf file of all the files aggregated into one final document. It should be the exact copy of the file you are currently reviewing. If you need to copy text for your report, select the "T" button or under the menus go to "Tools" => "Advanced Editing" => and then select the text desired. My OC manager over the Schrock facility should have the APD-CERT signed by this Friday, which will make the tank's VOC emissions federally enforceable below Title V threshold potential.

Thanks. Scott Carrell 501 Westlake Park Bld, Ste. 2.102B

Houston, Texas 77079 Direct: (281) 366-8431 Mobile: (832) 472-7158 Fax: (281) 366-7945 Scott.Carrell@bp.com

Note: This email and attachments are confidential and may be subject of legal privilege. If you are not the intended recipient please return this email and destroy this message. You are not permitted to copy, disclose, or use the content in any way.

From: Donna Wurst [mailto:DWurst@tceq.state.tx.us]

Sent: Tuesday, February 17, 2009 10:50 AM

To: Carrell, Scott

Subject: RE: TCEQ revised form 10228 PI-7

Good morning, Mr. Carrell,

If you could send the information (that pertains to the Schrock Wm No. 38 site) in electronic form, it would expedite my review. There is some information in the PBR application that can be copied/pasted into my technical review.

Thanks for considering Donna

Please consider whether it is necessary to print this e-mail Donna M. Wurst
Texas Commission on Environmental Quality
OPR / Rule Registrations Section
P.O. Box 13087 (MC 163)
Austin, TX 78711-3087
Ph. #(512) 239-5258
Fax # (512) 239-1070

>>> "Carrell, Scott" <Scott.Carrell@bp.com> 2/16/2009 12:50 PM >>>
Please see the attached revised PI-7 form. The APD-CERT form as previously discussed will be mailed in from our Midland, Tx location. The APD-CERT form is to ensure the tank emission limit for VOC is federally enforceable below 100 tpy.

Thanks, Scott Carrell

501 Westlake Park Bld, Ste. 2.102B

Houston, Texas 77079 Direct: (281) 366-8431 Mobile: (832) 472-7158 Fax: (281) 366-7945 Scott.Carrell@bp.com

Note: This email and attachments are confidential and may be subject of legal privilege. If you are not the intended recipient please return



Texas Commission on Environmental Quality Form APD - CERT Certification of Emission Limits (Page 1)

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L				<u> </u>	<u>. Sastai</u>	<u> </u>				- 11 - 11 S.S.
	Company Name:	BP America Prod	uction Co	трану						
В.	Responsible Official Name:				Responsible C	official's Title:		Permian	OC	Manager
-	Mailing Address:	600 N Marienfeld		<u>=</u> _			7=-			
	City:	Midland	County:	Midland	State:	TX		Code:	79	701
_	Telephone No.:	432-688-5535	Fax No.:	432-688-5246	E-mail Addres	s: alton.callihan@b	p.c	om.		-
C.	Site Name:	Schrock WM No.	38							
	Street Address: (if different)									
	If "NO," street address descr From Hwy 158 at FM 1379	• •		-	mi. turn Winto	cattleguard "D" & o	n O.	4 mi. &	S 0.1	mi
		, 6						,		
	City or nearest city:	Midkiff			County:	Glasscock	Zij	Code:		79755
Đ.	TCEQ Account Identification	n Number (leave bl	ank if unki	nown):						
E.	TCEQ Customer Reference	Number (leave blan	k if unkno	wn):	CN60012937	3			i, i	
	TCEQ Regulated Entity Nun	nber (leave blank if	unknown)	:	RN10429935	9				
F.	Does the site have a Title V	Permit?						YES	Х	NO
	Title V Permit Number:									
H.	Is this a small business?							YES	X	NO
n.	Attach the Following	Documentations :								
A.	Copies of a previously comp	leted Form PI-7 or	Form PI-1	S and all supporti	g documentation		X			
	A list of each source of air er			х						
	A summary of the certified e		X							
D.	A process description.	X	~							
Ĥ	··· Maintain Records On	Site to Demonstr	ate Conti	nuing Complian	ce and Make th	e Records Available	Óΰ	Request		
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_	30 TAC § 115 for Volatile C	-	:	-		for Nitrogen Oxides				
-	40 CFR Part 60, Subpart	-		-	40 CFR Part 6	•				
	40 CFR Part 63, Subpart		•	-	_	t Major Source Applica	abili	y	-	•
	Standard Permit:		•	_	Other:					
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	to the locations indicated in							l	1	
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	under a general operating po		ØF.				1	1		
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Reminder: The original of this certification must be sent to the TCEQ in Austin and copies sent to the appropriate TCEQ Regional office and any local air pollution control programs with jurisdiction. A copy must also be maintained on site or, for sites that normally operate unattended, at an office within Texas having day-to-day operational control of the site.



Texas Commission on Environmental Quality Form APD-CERT Certification of Emission Limits (Page 2)

FIN	Facility Name	EPN	Point Name	Authorization Type	Authorization Date	Permit or Registration Number	Air Contaminant Name	Maximum 6 Emission	
						(if applicable)		Pounds/ Hour	Tons/ Year
CHRTK01	Oil Tank	SCHRTK01	Oil Tank Vent	PBR 106.352	2/16/2009	72355	voc	N/A	13.77
		•							
									······
	15111 2 111 2 11 2 11 11 11 11 11 11 11 11				,				

Attach additional pages if needed



Donna Wurst - Correction Please

From:

Donna Wurst

To:

Suniga, Richard

Date:

2/18/2009 11:12 AM

Subject: Correction Please

CC:

Partee, Michael

144380 72355 **BP** America

Proj. Admin. Name and Proj. Tech. Name should be corrected to read:

Schrock WM No. 38

Site Name appears to be alright.

Cindy said it should be no problem to send you this request straight from me instead of it having to go through her.

Please consider whether it is necessary to print this e-mail Donna M. Wurst Texas Commission on Environmental Quality OPR / Rule Registrations Section P.O. Box 13087 (MC 163) Austin, TX 78711-3087 Ph. #(512) 239-5258 Fax # (512) 239-1070



"Carrell, Scott" <Scott.Carrell@bp.com>

To:

"Donna Wurst" <DWurst@tceq.state.tx.us>

Date:

2/17/2009 11:38 AM

Subject:

BP Schrock WM No. 38 Registration

Attachments:

2009_01_21_PBR_Submittal_Schrock_WM_38_200_bopd_118_H2S.pdf

Please see the attached pdf file of all the files aggregated into one final document. It should be the exact copy of the file you are currently reviewing. If you need to copy text for your report, select the "T" button or under the menus go to "Tools" => "Advanced Editing" => and then select the text desired. My OC manager over the Schrock facility should have the APD-CERT signed by this Friday, which will make the tank's VOC emissions federally enforceable below Title V threshold potential.

Thanks, Scott Carrell

501 Westlake Park Bld, Ste. 2.102B

Houston, Texas 77079 Direct: (281) 366-8431 Mobile: (832) 472-7158 Fax: (281) 366-7945 Scott.Carrell@bp.com

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From: Donna Wurst [mailto:DWurst@tceq.state.tx.us]

Sent: Tuesday, February 17, 2009 10:50 AM

To: Carrell, Scott

Subject: RE: TCEQ revised form 10228 PI-7

Good morning, Mr. Carrell,

If you could send the information (that pertains to the Schrock Wm No. 38 site) in electronic form, it would expedite my review. There is some information in the PBR application that can be copied/pasted into my technical review.

Thanks for considering Donna

Please consider whether it is necessary to print this e-mail Donna M. Wurst
Texas Commission on Environmental Quality
OPR / Rule Registrations Section
P.O. Box 13087 (MC 163)
Austin, TX 78711-3087
Ph. #(512) 239-5258
Fax # (512) 239-1070

>>> "Carrell, Scott" <Scott.Carrell@bp.com> 2/16/2009 12:50 PM >>>

Please see the attached revised PI-7 form. The APD-CERT form as previously discussed will be mailed in from our Midland, Tx location. The APD-CERT form is to ensure the tank emission limit for VOC is federally enforceable below 100 tpy.

Thanks, Scott Carrell

501 Westlake Park Bld, Ste. 2.102B

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R&R Screening for New Projects

		•			-		
Company	BP > 1 wk from Rec'd?	□Ves PX:	Permit #	72355		Project #	144380
	> 1 wk from Kec'd?	⊔ Yes MaNo					
☑ Project Type	•	Revise	☐ Renew		PBR	□ StdP	□ GOP
	Reply to Void?			Other Air NSR @ RN?	□Yes Z ÍNo	□ Unknown	-
	RN	1042	99359	List #s/Prev Reviewer:			
				□ Rush/Reason:			
PBR/SP/GOP #	352		Industry Type Project's Purpose	086			
Site Rvw Req'd? RFC SR Sent	□Yes ZNo □Yes ZNo		County NA Area?	Class code		Toxics Project Email sent	□Yes ÞZNo □Yes ÞZNo
Supporting Info	Correct Appl Form?	⊿ Yes □No		Site PSD Major?			
As Provided	CERT or PI-1S Signed?	□Yes □No	ØN/A	Site NA Major?			
	Fee? Project Description?	□Yes ZNo	□ N/A	Netting Provided?			
	Checklists/Rule info?	ZYes UNo	□ N/A	Site FOP Major? NSPS, MACT Discussed?			
	Emissions Info?	DYes □No	□ N/A	Ch 115, 117 Discussed?	ZYes DNo	□ N/A	
Issues / Info	•			, 			
ID'd by Screening							· · · · · · · · · · · · · · · · · · ·
Reviewer Assign:	□ Simple 🗹 Moderate	□ Complex	□ Other				
Recommend?		MidRvwr	□Sr/WLdr	☐ TechSp ☐ Other:			
Date Screened	2/13		Rvwr Initials	Sul			
Project Coord:		Ī	5		- 1		
Assigned to	DONNA		Date Transfer	2-13] UNITY	YPE ENTERED	V OS
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Actions by Reviewer	actions taken based on not	es above		****	Initi	al Review Date	
					1	1	
					Draft Ti	RV GW Doc No.	

02/16/2009NSR IMS - PROJECT RECORD	
	ISSUED DT:
CUSTOMER INFORMATION (OWNER/OPERATOR DATA) ISSUED TO: BP AMERICA PRODUCTION COMPANY COMPANY NAME: BP AMERICA PRODUCTION COMPANY CUSTOMER REFERENCE NUMBER: CN600129373	
REGULATED ENTITY/SITE INFORMATION REGULATED ENTITY NUMBER: RN104299359 ACCOUNT SITE NAME: SCHROCK WM 38 BATTERY REGULATED ENTITY LOCATION: GOING S ON FM 1379 AT FM 1357	
CATTLEGUARD D & ON 0.4 MI & S 0.1 MI REGION 07 - MIDLAND NEAR CITY: MIDKIFF	COUNTY: GLASSCOCK
CONTACT DATA	
CONTACT NAME: MR SCOTT CARRELL CONTACT ROLE: RESPONDED TITLE: AIR QUALITY SPECIALIST ORGANIZATION: BP AND MAILING ADDRESS: PO BOX 3092, HOUSTON, TX, 77253-3092 PHONE: (281) 366-8431 Ext: 0 FAX: (281) 366-7945 Ext: 0 EMAIL:SCOTT.CARRELL@BP.COM	PONSIBLE OFFICIAL MERICA PRODUCTION COMPANY
PROJECT NOTES: 02/12/2009 RESUBMITTAL VOIDED PROJECT 139966 FEE TRAIPERMIT NOTES:	NSFERRED
TRACKING ELEMENTS: TE Name APIRT RECEIVED PROJECT (DATE) APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE) PROJECT RECEIVED BY ENGINEER (DATE) DEFICIENCY CYCLE ENGINEER INITIAL REVIEW COMPLETED (DATE) PEER / MANAGER REVIEW PERIOD	Start Date Complete Date 02/11/2009 02/12/2009 02/13/2009

UNIT TYPES:

Project Unit Type:

PROJECT RULES:

Rule Desc

106.352 OIL AND GAS PRODUCTION FACILITIES -

Request Type

On Application

Approve

ADD

Υ

APPROVE

PERMIT RULES:

Rule Desc

Start Date

End Date

106.352

06/22/2004



Donna Wurst

To:

Carrell, Scott

Date:

2/17/2009 10:50 AM

Subject: RE: TCEQ revised form 10228 PI-7

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Thanks for considering Donna

Please consider whether it is necessary to print this e-mail Donna M. Wurst Texas Commission on Environmental Quality OPR / Rule Registrations Section P.O. Box 13087 (MC 163) Austin, TX 78711-3087 Ph. #(512) 239-5258 Fax # (512) 239-1070

>>> "Carrell, Scott" <Scott.Carrell@bp.com> 2/16/2009 12:50 PM >>>

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Thanks. Scott Carrell

501 Westlake Park Bld, Ste. 2.102B

Houston, Texas 77079 Direct: (281) 366-8431 Mobile: (832) 472-7158 (281) 366-7945 Fax: Scott.Carrell@bp.com

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From: Richard Suniga [mailto:RSuniga@tceq.state.tx.us]

Sent: Thursday, February 12, 2009 9:16 AM

To: Carrell, Scott

Subject: TCEQ revised form 10228 PI-7

Mr. Carrell,

I'm reviewing your application for permit number 72355 increased throughput at the Schrock Wm No. 38 battery, I have attached the subject form. In order to avoid any delay in processing your application please complete the revised TCEQ form and return to me no later than Feb 16, 2009.

Sincerely,

Richard Suniga Texas Commission on Environmental Quality Air Permits Initial Review Team, MC 161 Air Permits Division 512.239.5325 512.239.4500 (Fax)

Donna Wurst - RE: TCEQ revised form 10228 PI-7

From:

"Carrell, Scott" <Scott.Carrell@bp.com>

To:

"Richard Suniga" < RSuniga@tceq.state.tx.us>

Date:

2/16/2009 12:50 PM

Subject:

RE: TCEQ revised form 10228 PI-7

CC:

<DWurst@tceq.state.tx.us>

Attachments:

PI-7-Updated.pdf

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Houston, Texas 77079 Direct: (281) 366-8431 Mobile: (832) 472-7158 Fax: (281) 366-7945 Scott.Carrell@bp.com

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Sincerely,

Richard Suniga Texas Commission on Environmental Quality Air Permits Initial Review Team, MC 161 Air Permits Division 512.239.5325 512.239.4500 (Fax)



Texas Commission on Environmental Quality Registration for Permits by Rule (PBR) Form PI-7 Submission Form

Are there any other air preconstruction permits at this site that would be directly Associated with this project?? YES X NO If "YES," enter Permit Nos.:	ICEG										
Company of Other (Content Name) Sent Carried (Sentence Name) Sent Carried (Sentence Name) Sent Carried (Sentence Name) Sent Carried (Sentence Name) Sent Carried (Sentence Name) Sent Carried (Sentence Name) Sent Carried (Sentence Name) Sent Carried (Sentence Name) Sent Carried (Sentence Name) Sent Carried (Sentence Name) Sent Carried (Sentence Name) Sent Carried (Sentence Name) Sentence Name) Sentence Name Sent Carried (Sentence Name) Sentence Name Senten	I. REGISTRANT INFORMATION					1.1					
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Company Manager Advisors	Note: If no CN or RN number was entered above, plea	sse fill out the <u>required</u> Core Da	ta Form, which	h will be avail	able in Step II of	the submitted	process.				
Making Address	B. Company or Other Legal Customer Name:	BP America Productio	n Company	,		·					
Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description Description	Company Official Contact Name:	Scott Carrell		Title:	Air Quality	Specialist					
Contaminate Casasan Numer: Secret Current Table Air Quartity Specieties	Mailing Address:	P.O. Box 3092									
Contaminate Casasan Numer: Secret Current Table Air Quartity Specieties	City:	Houston		State:	TX		Zip Code:	77253-3092	1		
Credential Classed Names						LIS					
BP American Production Company							D-Inair.	SCOULCE IT C	падърссии		
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\$\frac{1}{\text{Are you claiming historical standard exemptions or FBR?} \text{ VES } X \text{ NO } \text{ If "VES" enter refrective date and Rule No.: \$\text{ VES } X \text{ NO } \text{ If "VES" enter Registration Number and Rule Number: \$\text{ 7.2355} \text{ 150.535} \text{ (posted)} \text{ 150.535} \text{ (posted)} \text{ VES } X \text{ NO } \text{ If "VES", enter Registration Number and Rule Number: \$\text{ 150.535} \text{ (posted)} \text{ VES } X \text{ NO } \text{ If "VES", enter Registration Number and Rule Number: \$\text{ 150.535} \text{ (posted)} \text{ VES } \text{ NO } \text{ If "VES," enter Registration Number and Rule Number: \$\text{ 150.535} \text{ (posted)} \text{ VES } \text{ NO } \text{ If "VES," enter Permit Nos.: \$\text{ 7.255} \text{ NO } \text{ If "VES," enter Permit Nos.: \$\text{ 7.255} \text{ NO } \text{ If "VES," enter Permit Nos.: \$\text{ 7.255} \text{ NO } \text{ If "VES," enter Permit Nos.: \$\text{ 7.255} \text{ NO } \text{ If "VES," enter Permit Nos.: \$\text{ 7.255} \text{ NO } \text{ If "VES," enter Permit Nos.: \$\text{ 7.255} \text{ NO } \text{ If "VES," enter Permit Nos.: \$\text{ 7.255} \text{ NO } \text{ If "VES," enter Permit Nos.: \$\text{ 7.255} \text{ NO } \text{ If "VES," enter Permit Nos.: \$\text{ 7.255} \text{ NO } \text{ If "VES," enter Permit Nos.: \$\text{ 7.255} \text{ NO } \text{ If "VES," enter Permit Nos.: \$\text{ 7.255} \text{ NO } \text{ 160.655} \text{ NO }	B. PBR claimed under 30 TAC § 106 (List all that	apply in hard copy, or choose	all that apply	from the drop	down menus ti	n electronic v	ersion):				
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E. Is dam's a previous Standard Exemption or PBR for the facility in this registration? (Annah details regarding changes) VES X NO If "YES," enter Registration Number and Rule Number A which is a previous standard Exemption or PBR? X YES NO If "YES," enter Registration Number and Rule Number If Number and Rule Number in 106.352 (04.000) A with the way their ris preconstruction permits at this site. A y YES NO If "YES," enter Registration Number and Rule Number. 106.352 (04.000) A standard Exemption or PBR? X YES NO If "YES," enter Permit No: The Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption Office of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption of the Standard Exemption Office Office Office Exemption Office Office Exemp	§106.		§106.								
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D. Art ther my other facilities at this site which are matherized by an Art Steaderd Exemption or PBR? If "YES," enter Registration Number and Rath Number: 106.352 (19400) E. Arts there may other in precessarization permits at this site? X YES NO If "YES," enter Permit Not: 272. Arts there may other in precessarization permits at this site that would be directly YES X NO If "YES," enter Permit Not: 372. Arts there may other in precessarization permits at this site that would be directly YES X NO If "YES," enter Permit Not: 372. Arts there may other in precessarization permits at this site that would be directly YES X NO To Be Determit Permit Not: 372. Arts the major of the precessariation of the precessarian permits at this site that would be directly YES X NO To Be Determit Not: 372. Arts the major of the major of the precessarian permits and the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the major of the maj			tion? (Attach	details regar	ding changes)				YES	х	NO
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If YES,* enter Registration Number and Rule Number: 106.352 (04/00)			ard Exemptic	on or PBR?				х	YES		NO
E. Art there may other air preconstruction permits at this site? Are there may other air preconstruction permits at this site that would be directly YES X NO II "YES," enter Permit Nos.: 72. Are there may other air preconstruction permits at this site that would be directly YES X NO II "YES," enter Permit Nos.: 172. As this facility bocated at a site required to obtain a federal operating permits premate to 30 TAC Chapter 1227 YES X NO To Be Determit The site currently has an existing included operating permits permits to 30 TAC Chapter 1227 YES X NO To Be Determit The site currently has an existing included permits permits to make the supply.) Intelligent of the requirements of 30 TAC Chapter 122 the will be triggered if this faint in sacepted (check all that apply) Intelligent of the requirements of 30 TAC Chapter 122 the will be triggered if this faint in sacepted (check all that apply) Bind Angelesiation for a "Pipelisation(s) bindination faint in sacepted (check all that apply) SOP SOP application/revision application (submitted or under APD review) GOP GOP application/revision applications (submitted or under APD review) SOP SOP application/revision applications (submitted or under APD review) A TA I this registration is under the failure of the site of the site (check all that apply) To destruction of the 10 required current the failure in genericus. If "YES," to question III A. a fee to not required, stip to Section IV. If 'NO' to answer III A., then go to Section IV. If NO' to answer III A., then go to Section IV. If NO' to answer III A., then go to Section IV. If NO' to answer III A., then go to Section IV. If NO' to answer III A., then go to Section IV. If NO' to answer III A., then go to Section IV. If NO' to answer III A., then go to Section IV. If NO' to answer III A., then go to Section IV. If NO' to answer III A., then go to Section IV. If NO' to answer III A., then go to Section IV. If NO' to answer III A., then go to Section IV. If NO' to answer III A., then go to Section IV. If					·		1				
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Test is in Entity total and a six enquired to obtain a federal operating permit purmant to 30 TAC Chapter 1227								+			
If the six currently has an existing federal operating permit, cites: the permit number:				YES	Х	NU		If "YES,"	enter Permit Nos.:		
Identify the requirements of 50 TAC Chapter 122 that will be triggered if this claim is accepted: (check all that apply)				TAC Chapter	1227		YES			To	Be Determined
Initial Application for an FOP								Permit No.			
Operational Flexibility/Off Permit Notification for an SOP Revision for GOP To Be Determined X None		2 that will be triggered if this cl				al .	Miner Besi	eine for COD			
Identify the type(s) issued and/or FOP application(s) submitted/pending for the site: (check all that apply) SOP SOP application/revision application (submitted or under APD review) GOP GOP polication/revision application (submitted or under APD review) X N/A IT TEC (Account Identification Number: (l/ Innown): III. FEE INFORMATION To determine if a fee it required curser the following questions. If "ES," to question III. A., a fee it not required, skip to Section IV. If "NO" to curser III. A., then go to Section III. B. See Section VI odders to send fee or go to www.l. Long state to subject to pop online A. Is this registration as undust to a previously registrated facility and accompanied by a Certification Form solely to establish a federally enforceable emission limit? YES X NO B. What is the fee amount? If "TES," to any of the following three questions, a \$100 fee is required. Otherwise, a \$450 fee is required. Does this business have less than 100 employees or have less than 6 million dollars in annual gross receipts? YES X NO C. Check/Money Order or Transaction Number (Popule to TEEQ): 801384509 Was fee Parld online? YES X NO C. Check/Money Order or Transaction Number (Popule to TEEQ): 801384509 Was fee Parld online? YES X NO C. Company Name on Check: BP America Production Company Fee Amount: 5450 YES EXETED FACILITY REVIEWS ONLY. TECHNICAL INFORMATION Note: If claiming our of the following PBRs, complete this section, then ship to Section VI "Submitting Your Registration" below: Animal Feeding Operations §106.141 Livestock Act from Feelither §106.162 Sam Mills §106.2-273 PS SELECTED SANCES SANCES and Different Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances Sances S		otification for an SOP	 			1			l x lx	lone	
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GOP GOP application/tervision application (submitted or under APD review) X N/A 3. TCEQ Account Identification Number (If bowns): III. FEE INFORMATION To determine If a fee it required answer the following questions. If "PSX," to question III. A., a fee it not required, altap to Section IV. If "NO" to answer III. A., then go to Section III. B. See Section IV. It is this registration an update to a previously registrated facility and accompanied by a Certification Form solely to establish a federally enforceable emission limit? YES X NO B. What is the fee amount! If "PSX," to any of the following three questions, a 5100 fee to required. Otherwise, a 5450 fee to required. Does this business have less than 100 employees or have less than 6 million dollars in annual gross receipts? It is its registration submitted by a governmental entity with a population of less than 10,000? YES X NO C. Check/Money Order or Transaction Number (Psymble to TCEQ): 801384350 Was fee Paid online? YES X NO C. Company Name on Check: BP America Production Company Fee Amount: S450 YES EXCENDED A PROFILE TO A PREVIEWS ONLY. TEXNINCAL INFORMATION Note: If classing one of the following PBRs, complete this section, then akip to Section IV? "Submitting Your Registration" below: Animal Feeding Operations (Bin. Inc. Il Livestock Austron Faelities (Bin. 3). CS saw Mills 1802-23 Grais Handling, Storage and Drying § 106-233 Anto Body Reflatibing Faelitides § 106-236 Air Cartain Incinerators § 106-647. A Is the applicable PBR checklist attached which shows the facility meets all general and specific requirements of the PBR(s) being chained? (If submitting electronically, older. "YES") B) Distance from this facility's emission release point to the nearest property structure: V. TECHNICAL INFORMATION INCLUDING STATE AND FEDERAL REGULATORY REQUIREMENTS Registration information submitted and property anaked "Convilled State and federal regulations and standards to claim a PBR. A) Confidential information cubmitted and property m					riew)						
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Is this registration submitted by a governmental entity with a population of less than 10,000? C. Check/Money Order or Transaction Number (Payable to TCEQ): 801384350 Was fee Paid online? YES X NO Company Name on Check: BP America Production Company Fee Amount: 5450 Note: If claiming one of the following PBRs, complete this section, then skip to Section VI "Submitting Your Registration" belaw: Animal Feeding Operations \$100.161 Livestock Auction Pacifilities \$100.436 Air Cartain Incinerator \$100.430 As it the applicable PBR checklist attached which shows the facility meets all general and specific requirements of the PBR(a) being YES NO Caimed? (If submitting electrocically, click "YES") B Distance from this facility's emission release point to the nearest off-property structure: Distance from this facility's emission release point to the nearest off-property structure: Technical Information submitted and properly marked "CONFIDENTIAL" with this registration? A. Is confidential information submitted and properly marked "CONFIDENTIAL" with this registration? YES NO B. Is a process flow diagram or a process description attached? A. Is confidential information submitted and properly marked "CONFIDENTIAL" with this registration? YES NO D. Is information attached showing how the general requirements (30 TAC § 106.4) of the PBR is met for this Registration? (PBR checklists may be used, but are optional) Note: Please be reminded that if the focilitate listed in this registration? YES NO No Please be reminded that if the focilitate listed in this registration? PER checklists may be used, but are optional) F. Distance from this facility's emission release point to the nearest property line: See No Please be reminded that if the focilitate listed in this registration? PER checklists may be used, but are optional) F. Distance from this facility's emission release point to the nearest property line: See No Note: In limited cases, a map or drawing of the site and surrounding land use may be	B. What is the fee amount? If "YES," to any of the	e following three questions, a	\$100 fee is re	quired. Othe	rwise, a \$450 j	lee is require	rd.				
Is this registration submitted by a governmental entity with a population of less than 10,000? C. Chock/Money Order or Transaction Number (Payable to TCEQ): 801384350 War fee Paid online? YES X NO Company Name on Check: BP America Production Company Pee Amount: 5450 V. SELECTED FACILITY REVIEWS ONLY. TECHNICAL INFORMATION Note: If claiming one of the following PBRs, complete this section, then skip to Section VI "Submitting Your Registration" below: Animal Feeding Operations §106.161 Livestock Auction Facilities 100.162 Saw Mills §106.223 Grain Handling, Storage and Drying §106.233 Auto Body Reflashing Facilities §106.345 Air Curtain Incinerator §106.4936 A. Is the applicable PBR checklist attached which shows the facility meets all general and specific requirements of the PBR(s) being YES NO claimed? (If submitting electronically, click "YES") No B. Distance from this facility's emission release point to the nearest off-property structure: Distance from this facility's emission release point to the nearest off-property structure: Eater in Feet: V. TECHNICAL INFORMATION INCLUDING STATE AND FEDERAL REGULATORY REQUIREMENTS Registratus must be in compliance with all applicable state and federal regulations and standards to claim a PBR. A. La Confidential information submitted and property marked "CONFIDENTIAL" with this registration? YES NO B. Is a process flow diagram or a process description attached? X YES NO D. Is information attached showing how the general requirements (30 TAC § 106.4) of the PBR is met for this Registration? (PBR checklists may be used, but are optional) Note: Please be reminded that if the facilities listed in this registration are subject to the Mass Emissions Cap & Trade program under 30 TAC Chapter 101, Subchapter H, Division 3, the owner/operc of these facilities must possess NO., allowances equivalent to the account NO., emissions from these facilities. Note: In limited cases, a map or drawing of the site and surrounding land use may be requested during the	Does this business have less than 100 emplo	yees or have less than 6 million	n dollars in an	mual gross re	ceipts??				YES	X	NO
C. Check/Money Order or Transaction Number (Payable to TCEQ): 801384350 Was fee Puld online? YES X NO Company Name on Check: BP America Production Company Fee Amount: 5450 VI. SELECTED FACILITY REVIEWS ONLY - TECHNICAL INFORMATION Note: If claiming one of the following PBRs, complete this section, then skip to Section VI "Submitting Your Registration" below: Animal Feeding Operations §106.161 Livestock Auction Facilities §106.162 Saw Mills §106.223 Grain Handing, Storage and Drying§106.233 Auto Body Refinishing Facilities §106.436 Air Curtain Inscinerator §106.436 At the applicable PBR checklist attached which shows the facility meets all general and specific requirements of the PBR(a) being claimed? (If submitting electronically, click "YES") B. Distance from this facility's emission release point to the nearest off-property structure: Distance from this facility's emission release point to the nearest off-property structure: V. TECHNICAL INFORMATION INCLUDING STATE AND FEDERAL REGULATORY REQUIREMENTS Registrants must be in compiliance with all applicable state and federal regulations and standards to claim a PBR. A. Is Confidential information submitted and property marked "CONFIDENTIAL" with this registration? YES NO D. Is information attached showing how the general requirements (30 TAC § 106.4) of the PBR is met for this Registration? (PBR checklists may be used, but are optional) Note: Please be reminded that if the facilities listed in this registration are subject to the Mass Emissions Cap & Trade program under 30 TAC Chapter 101, Subchapter H, Division 3, the owner/operar of these facilities must possess NO, allowances equivalent to the actual NO, emissions from these facilities. E. Is information attached showing how the specific PBR requirements are met for this registration? X YES NO Provision of the state of the information of the actual NO, emission release point to the nearest property line: 2534 feet Note: In limited cases, a map or drawing of the site and surrounding l	Is this registration submitted by a government	ntal entity with a population of	less than 10,0	000?					YES	Х	NO
Company Name on Check: BP America Production Company Fee Amount: \$450 IV. SELECTED FACILITY REVIEWS ONLY - TECHNICAL INFORMATION Note: If Islaining one of the following PBRs, complete this section, then skip to Section V7 "Submitting Your Registration" below: Animal Feeding Operations \$106.161 Livestock Auction Facilities \$106.162 Saw Mills \$106.273 Grain Handling, Storage and Drying \$106.233 Auto Body Refinishing Facilities \$106.436 Air Cartain Jacinerator \$106.496 A. Is the applicable PBR checklist attached which shows the facility meets all general and specific requirements of the PBR(s) being claimed? (If submitting electronically, click "YES") B. Distance from this facility's emission release point to the nearest off-property structure: Distance from this facility's emission release point to the nearest off-property structure: Distance from this facility's emission release point to the nearest off-property structure: Enter in Feet: Distance from this facility's emission release point to the nearest off-property structure: Enter in Feet: V. TECHNICAL INFORMATION INCLUDING STATE AND FEDERAL REGULATORY REQUIREMENTS Registration? Registration submitted and properly marked "CONFIDENTIAL" with this registration? YES X NO B. Is a process flow diagram or a process description attached? "YES" NO C. Are emissions data and calculations for this claim attached? "YES" NO D. Is information attached showing how the general requirements (30 TAC § 106.4) of the PBR is met for this Registration? (PBR checklists may be used, but are optional) Note: Please be reminded that if the focilities listed in this registration are subject to the Mass Emissions Cap & Trade program under 30 TAC Chapter 101, Subchapter H, Division 3, the owner/opera of these facilities must possess NO, allowances equivalent to the actual NO, emissions from these facilities. E. Is information attached showing how the specific PBR requirements are met for this registration? YES NO (PBR checklists may be used, but are optional) F. Dis					-	Was fee Pa	id online?		YES	х	NO
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CEG - 10228 (Rev 05/08) PI-7 Form											

TCEQ - 10228 (Rev 05/08) PI-7 Form
This form is used by sources subject to air quality permits requirements and
may be revised periodically. [APDG 5096v10]

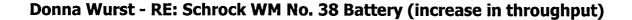






Texas Commission on Environmental Quality Registration for Permits by Rule (PBR) Form PI-7 Submission Form

VI. SUBMITTING YOUR REGISTRATION		
A. FEES - Pick one of the two options below for p	ayment	
Who	Where	What
t. Fee Paid on line	GO TO WEBSITE www2.tceq.state.tx.ns/epay	No Additional Action Needed
2. Fee mailed to Revenue Section, TCEQ Review (PAR) Section, TCEQ	Regular, Certified, Priority Mail MC 214, P.O. Box 13088, Austin, Texas 78711-3088 Hand Delivery, Overnight Mail MC 214, 12100 Park 35 Circle, Building A, Third Floor, Austin, Texas 78753	Original Money Order or Check Copy of Form PI-7 and Core Data Form
B. COPIES OF THE REGISTRATION - Copie	s must be sent as listed below. Processing delays may occur if copies are not sent as noted.	
Note: Section C only for those submitting electro	nically. If you are not submitting electronically, follow section B and disregard section C.	
1. Hard Copy Only Permits Administrative	Regular, Certified, Priority Mail MC 161, P.O. Box 13087, Austin, Texas 78711-3087 Haad Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building F, First Floor, Room 1206, Austin, Texas 78753 Facsimile (512) 239-2123 (do 100) follow fax with paper copies)	Originals - Form Pi-7, Core Data Form; all attachments
Appropriate local and TCEQ regional office program(s)	(To find your local or regional air pollution control programs go to the TCEQ, APD Web site at www.tceq.state.tx.us/nav/permits/air_permits.html, or call (512) 239-1250)	Copy of Form PI-7, Core Data Form; all attachments to each office
3. Print	(Blank For Print Button)	Prints a hard copy of the Form PI-7
C. ELECTRONIC SUBMISSION		
Electronic Submittal Only	(Blank For Submittal Button)	Proceeds to Step II of the electronic submittal process



Donna Wurst

To:

Carrell, Scott

Date:

2/5/2009 12:37 PM

Subject: RE: Schrock WM No. 38 Battery (increase in throughput)

Yes sir. That works for me. Mr. Monico Banda (my work leader) will also be present since he is one of our oil and gas experts and I am still fairly new to the oil and gas industry projects. I want to make sure that we provide the best customer service.

I will let you know as soon as possible if this time conflicts with other activities on Monico's calendar. He is currently on his lunch hour.

Thanks Donna

Please consider whether it is necessary to print this e-mail Donna M. Wurst Texas Commission on Environmental Quality OPR / Rule Registrations Section P.O. Box 13087 (MC 163) Austin, TX 78711-3087 Ph. #(512) 239-5258 Fax # (512) 239-1070

>>> "Carrell, Scott" <Scott.Carrell@bp.com> 2/5/2009 12:31 PM >>> Do you have 8 to 9 available on the 11th?

----Original Message----

From: "Donna Wurst" < DWurst@tceq.state.tx.us>

To: "Scott Carrell" <Scott.Carrell@bp.com>

Cc: "Monico Banda" <MBANDA@tceq.state.tx.us>; "Molly Wentworth" <MWentwor@tceq.state.tx.us>

Sent: 02/05/09 9:38 AM

Subject: RE: Schrock WM No. 38 Battery (increase in throughput)

Mr. Carrell,

I should be able to meet with you next Wednesday, Feb. 11th. What time would you like to meet? I have a team meeting from 10:00 - 12:00.

Thanks Donna

PPlease consider whether it is necessary to print this e-mail Donna M. Wurst Texas Commission on Environmental Quality **OPR / Rule Registrations Section** P.O. Box 13087 (MC 163) Austin, TX 78711-3087

Ph. #(512) 239-5258 Fax # (512) 239-1070

>>> "Carrell, Scott" <Scott.Carrell@bp.com> 2/5/2009 7:54 AM >>> Donna,

I would like to meet with you personally on February 11th to discuss the Schrock permit application if you have time. I will be in Austin on the 10th for the "TCEQ - Emissions Inventory Workshop". I will have the complete data as requested, and can answer any questions about our Permian operations at that time. Do you have the availability on the 11th?

Schrock WM No. 38 Battery RN104299359 CN600129373 PBR Registration # 72355

Thanks, Scott Carrell

501 Westlake Park Bld, Ste. 2.102B

Houston, Texas 77079 Direct: (281) 366-8431 Mobile: (832) 472-7158 Fax: (281) 366-7945

Scott.Carrell@bp.com

use the content in any way.

Note: This email and attachments are confidential and may be subject of legal privilege. If you are not the intended recipient please return this email and destroy this message. You are not permitted to copy, disclose, or

From: Donna Wurst [mailto:DWurst@tceq.state.tx.us]

Sent: Friday, September 12, 2008 9:03 AM

To: Carrell, Scott

Subject: Re: Schrock WM No. 38 Battery (increase in throughput)

Mr. Carrell,

Re: Schrock WM No. 38 Battery (increase in throughput)

As I promised on 9/10/08 during our phone conversation, I am sending you a request for more information for the above-referenced site which contains a little more detail than the deficiency letter.

1) Please provide a flow diagram that indicates what equipment and emission points are at the site and how the equipment/processes work. I need to know how many tanks, separators, etc. there are, especially all emission points.

Please include more information about the tank(s) (i.e., capacity). If more than one tank is present, a separate run of E&P Tanks must be provided. If set up in a series, there will only be flash for the first tank.

- 2) Please provide more information on how the blowdown tank (or is this a vent?) operates and confirm that venting volume is 290,000 scf/day.
- 3) Please provide corrected fugitive emissions using the correct wt% H2S and provide H2S emissions for

fugitives in light liquid service.

- 4) Please provide H2S emissions for the tank(s).
- 5) Please provide information, and documentation if available, on the H2S sample (i.e., Was this done separately in the field, and what method was used?)

Thanks Donna

Donna M. Wurst
Texas Commission on Environmental Quality
OPRR / Rule Registrations Section
P.O. Box 13087 (MC 163)
Austin, TX 78711-3087
Ph. #(512) 239-5258
Fax # (512) 239-1070

From:

"Carrell, Scott" <Scott.Carrell@bp.com>
"Donna Wurst" <DWurst@tceq.state.tx.us>

To: Date:

2/5/2009 12:32 PM

Subject:

RE: Schrock WM No. 38 Battery (increase in throughput)

Do you have 8 to 9 available on the 11th?

----Original Message--

From: "Donna Wurst" < DWurst@tceq.state.tx.us>

To: "Scott Carrell" <Scott.Carrell@bp.com>

Cc: "Monico Banda" <MBANDA@tceq.state.tx.us>; "Molly Wentworth" <MWentwor@tceq.state.tx.us>

Sent: 02/05/09 9:38 AM

Subject: RE: Schrock WM No. 38 Battery (increase in throughput)

Mr. Carrell.

I should be able to meet with you next Wednesday, Feb. 11th. What time would you like to meet? I have a team meeting from 10:00 - 12:00.

Thanks Donna

PPlease consider whether it is necessary to print this e-mail Donna M. Wurst
Texas Commission on Environmental Quality
OPR / Rule Registrations Section
P.O. Box 13087 (MC 163)
Austin, TX 78711-3087
Ph. #(512) 239-5258
Fax # (512) 239-1070

>>> "Carrell, Scott" <Scott.Carrell@bp.com> 2/5/2009 7:54 AM >>> Donna,

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Schrock WM No. 38 Battery RN104299359 CN600129373 PBR Registration # 72355

Thanks, Scott Carrell

501 Westlake Park Bld, Ste. 2.102B

Houston, Texas 77079 Direct: (281) 366-8431 Mobile: (832) 472-7158 Fax: (281) 366-7945 Scott.Carrell@bp.com

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From: Donna Wurst [mailto:DWurst@tceq.state.tx.us]

Sent: Friday, September 12, 2008 9:03 AM

To: Carrell, Scott

Subject: Re: Schrock WM No. 38 Battery (increase in throughput)

Mr. Carrell,

Re: Schrock WM No. 38 Battery (increase in throughput)

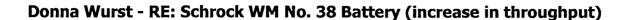
As I promised on 9/10/08 during our phone conversation, I am sending you a request

for more information for the above-referenced site which contains a little more detail than the deficiency letter.

- 1) Please provide a flow diagram that indicates what equipment and emission points are at the site and how the equipment/processes work. I need to know how many tanks, separators, etc. there are, especially all emission points. Please include more information about the tank(s) (i.e., capacity). If more than one tank is present, a separate run of E&P Tanks must be provided. If set up in a series, there will only be flash for the first tank.
- 2) Please provide more information on how the blowdown tank (or is this a vent?) operates and confirm that venting volume is 290,000 scf/day.
- 3) Please provide corrected fugitive emissions using the correct wt% H2S and provide H2S emissions for fugitives in light liquid service.
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Carrell, Scott

Date:

2/5/2009 9:38 AM

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Banda, Monico; Wentworth, Molly

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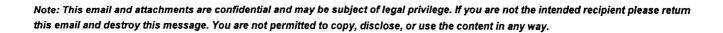
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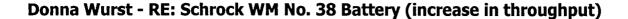
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Texas Commission on Environmental Quality Registration for Permits by Rule (PBR) Form PI-7 Submission Form

TCEQ			rorm r	I-7 Submi	ssion Form	1					
I. REGISTRANT INFORMATION						***************************************					****
A. TCEQ Customer Reference Number:	CN600129373			TCEQ Reg	ulated Entity N	umber.	RN	10429935	9		
Note: If no CN or RN number was entered above, ple	ease fill out the require	ed Core Da	ta Form, whic	h will be avail	able in Step II o	the submittal	process.				
B. Company or Other Legal Customer Name:	BP America F										
Company Official Contact Name:	Scott Carrell			Title:	Air Quality	Specialist					
Mailing Address:	P.O. Box 3092						•				
City:	Houston			State:	тх		Zip Code:	77253-3092	,		
Phone:	(281) 366-8431			Fax:	(281) 366-79	1 45	E-mail:	scott.carrel	l@bp.com		
C. Technical Contact Name:	Scott Carreli			Title:	Air Quality	Specialist					
Company:	BP America F	Productio	n Compan	у							
_ Mailing Address:	P.O. Box 3092										
City:	Houston			State:	TX		Zip Code:	77253-3092			
Phone:	(281) 366-8431			Fax:	(281) 366-7	945	E-mail:	scott.carrel	l@bp.com		
D. Facility Location Information - Street Address	:										
If no street address, provide written driving dire	ections to the site: (att	tach descri _l	ption if addii	tional space is	needed)						
From Hwy 158 at FM 1379, go S 11 mi to FM 1	357, turn left & cont.	t. 3.7 mi, tu	ra W into c	attleguard "	D" & on 0.4 m	i, & S 0.1 mi					
City:	Midkiff			County:	Glasscock		Zip Code:	7975	5		
II. FACILITY AND SITE INFORMATION											
A. Name and Type of Facility: Schrock	k Wm No. 38 Increas	ed Throug	thpat	X	Permanent			Portable			
B. PBR claimed under 30 TAC § 106 (List all tha	nt apply in hard copy, o	or choose a	all that apply	from the drop	o down menus i	n electronic v	ersion):				
§106. 352 (9/4/00)			\$106.								
§106.			§106.		<u></u>						
Are you claiming historical standard exemption	on or PBR?			YES	х	NO	If "YES" ent	er effective d	ate and Rule No	:	
C. Is there a previous Standard Exemption or PI	BR for the facility in the	his registra	tion? (Attac	h details regar	ding changes)			_	YES	X	NO
If "YES," enter Registration Number and Rule	Number:		7235	55			106,352 (9/4	/00)			
D. Are there any other facilities at this site which	are authorized by an	Air Stands	erd Exempti	on or PBR?				Х	YES		NO
If "YES," enter Registration Number and Rule	Number: 10	06.352 (9/4	/00)								
E. Are there any other air preconstruction perm			X	YES		NO		If "YES," e	nter Permit Nos.	:	7235
Are there any other air preconstruction permits associated with this project??	at this site that would	be directly	•	YES	x	NO		If "YES,"	nter Permit Nos.	;	
F. Is this facility located at a site required to obtain	n a federal operating	permit pu	rsuant to 30	TAC Chapter	122?	754	YES	x	NO	To	Be Determine
If the site currently has an existing federal opera						_		Permit No.:			
Identify the requirements of 30 TAC Chapter 12	22 that will be triggere	ed if this cl	aim is accept	ted: (check all	that apply)						
Initial Application for an FOP				Significant R	evision for SOI	1	Minor Revis	ion for SOP			
Operational Flexibility/Off Permit N											
			1 (1)	Revision fo			To Be Deter	mined	X	Vone	
Identify the type(s) issued and/or FOP application	on(s) submitted/pendi	ng for the		il that apply)	or GOP		To Be Deter	mined	X	None	
Identify the type(s) issued and/or FOP application SOP SOP app	on(s) submitted/pendit plication/revision appl	ng for the s	ibmitted or u	ill that apply) inder APD rev	or GOP	X	To Be Deter	mined	X I	None	
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program during an investigation.
TCEQ - 10228 (Rev 05/08) PI-7 Form
This form is used by sources subject to air quality permits requirements and
may be revised periodically. [APDG 5090/10]







Texas Commission on Environmental Quality Registration for Permits by Rule (PBR) Form PI-7 Submission Form

VI. SUBMITTING YOUR REGISTRATION		
A. FEES - Pick one of the two options below for pa	yment	
. Who	Where	What
1. Fee Paid on line	GO TO WEBSITE www2.tceq.state.tx.us/epay	No Additional Action Needed
2. Fee mailed to Revenue Section, TCEQ	Regular, Certified, Priority Mail MC 214, P.O. Box 13088, Austin, Texas 78711-3088	Original Money Order or Check
Review (PAR) Section, TCEQ	Hand Delivery, Overnight Mail MC 214, 12100 Park 35 Circle, Building A, Third Floor, Austin, Texas 78753	Copy of Form PI-7 and Core Data Form
B. COPIES OF THE REGISTRATION - Copies	must be sent as listed below. Processing delays may occur if copies are not sent as noted.	
Note: Section C only for those submitting electron	steally. If you are not submitting electronically, follow section B and disregard section C.	
Hard Copy Oaly Permits Administrative	Regular, Certified, Priority Mail MC 161, P.O. Box 13087, Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building F, First Floor, Room 1206, Austin, Texas 78753 Facsimile (512) 239-2123 (do tot fox with paper copies)	Originals - Form PI-7, Core Data Form; all attachments
Appropriate local and TCEQ regional office program(s)	(To find your local or regional air pollution control programs go to the TCEQ, APD Web site at www.toeq.state.tx.us/nav/permits/air_permits.html, or call (512) 239-1250)	Copy of Form PI-7, Core Data Form; all attachments to each office
3. Print	(Blank For Print Button)	Prints a hard copy of the Form PI-7
C. ELECTRONIC SUBMISSION		***
Electronic Submittal Only	(Blank For Submittal Button)	Proceeds to Step II of the electronic submittal proces



Texas Commission on Environmental Quality Registration for Permits by Rule (PBR)

Form PI-7

144 380 /

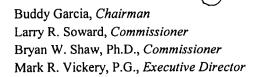
I. REGISTRANT INFORMATION					. ,				
A. TCEQ Customer Reference Number:	CN600129373		TCEO Rem	ulated Entity Number:	RN	1042993	50		
Note: If no CN or RN number was entered above,		Data Form whi				1042773			
B. Company or Other Legal Customer Name:				nable in Step 11 of the submit	iai process.				
	BP America Production	on Company							
Company Official Contact Name:	Scott Carrell		Title:	Air Quality Specialist					
Mailing Address:	P.O. Box 3092								
City:	Houston		State:	TX	Zip Code:	77253-309	2		•
Phone:	(281) 366-8431		Fax:	(281) 366-7945	E-mail:	scott.carr	ell@ bp.com		
C. Technical Contact Name:	Scott Carrell		Title:	Air Quality Specialist			•		
Company:	BP America Production	on Company			•				
Mailing Address:	P.O. Box 3092								
	Houston		Ctata	TV	7in Cada	77252 200			
City:			State:	TX	Zip Code:	77253-309	'Z	_	
Phone:	(281) 366-8431		Fax:	(281) 366-7945	E-mail:	scott.carr	ell@bp.com		
D. Facility Location Information - Street Addre	css:								
If no street address, provide written driving d	lirections to the site: (attach desc	ription if addi	itional space i	is needed)					
From Hwy 158 at FM 1379, go S 11 mi to FM	4 1357, turn left & cont. 3.7 mi,	turn W into o	attieguard "	D" & on 0.4 mi, & \$ 0.1 r	ai				
City: Midkiff			County:	Giasscock	Zip Code:	797	55		
II. FACILITY AND SITE INFORMATION									
A. Name and Type of Facility: Schro	ock Wm No. 38 Increased Throu	zhput	Х	Permanent		Portable			
							· · · · · · · · · · · · · · · · · · ·		
B. PBR claimed under 30 TAC § 106 (List all t	ıнаі арріў ін нага сору, от спооз	1	y jrom ine aro	p aown menus in electronic	version):				
§106. 352 (9/4/00)		\$106.							
§106.		§106.							
Are you claiming historical standard exemp	ption or PBR?		YES	X NO	If "YES" en	ter effective	date and Rule No	:	
C. Are you registering a grandfathered facility	y? If "YES," attach documentation	n of construct	ion date	YES	х	NO			
D. Is there a previous Standard Exemption or	PBR for the facility in this regist	ration? (Attac	h details rega	arding changes)			YES	х	NO
If "YES," enter Registration Number and Ru	ule Number:	7235	5		106,352 (9/	4/00)			
				·- -	1.00002 (37		VEC		NO
E. Are there any other facilities at this site whi	·	<u>-</u>	ION OF PBK:	_	-	X	YES		NO
If "YES." enter Registration Number and Ru									
F. Are there any other air preconstruction per	rmits at this site?	X	YES	NO			enter Permit Nos.	:	7235
G. Is this site required to obtain an air federal o	operating permit?		YES	X NO		If "YES."	enter Permit No.:		
H. TOEO Assount Identification Number 1984.									
H. TCEQ Account Identification Number (if kn	iown):								
III. FEE INFORMATION	nown):		· · · · · · · · · · · · · · · · · · ·		-				
III. FEE INFORMATION		question III. A.	, a fee is not i	required, skip to Section IV.	If "NO" to a	nswer III. A.	then go to Sectio	n III. B.	See Section VI
	llowing questions. If "YES," to q	question III. A.	, a fee is not i	required, skip to Section IV	If "NO" to a	nswer III. A.	then go to Section	n III. B.	See Section VI
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TCEQ - 10228 (Rev 10/06) PI-7 Registration for PBR

This form is for use by sources subject to air quality permits and may be revised periodically. [APDG 5097v13]

APIRT

FEB 1 1 2009



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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

September 12, 2008

MR SCOTT CARRELL AIR QUALITY SPECIALIST BP AMERICA PRODUCTION COMPANY PO BOX 3092 HOUSTON TX 77253-3092

Re: Permit by Rule Registration Number: 72355

Schrock WM No. 38 Battery Midkiff, Glasscock County

Regulated Entity Number: RN104299359 Customer Reference Number: CN600129373

Dear Mr. Carrell:

This is in response to your request to register the Schrock WM No. 38 Battery under Permit by Rule (PBR) Title 30 Texas Administrative Code §106.352 located near Midkiff, Glasscock County.

After evaluation of the information you provided, we are unable to verify that all conditions of the PBR have been met. Therefore, we cannot confirm your claim at this time. The following information was found to be deficient in your request:

- o Please provide a flow diagram that indicates what equipment and emission points are at the site.
- o Please provide more information on how the blowdown tank (or vent) operates and confirm that venting volume is 290,000 scf/day.
- Please provide corrected fugitive emissions using the correct wt% H₂S and provide H₂S emissions for fugitives in light liquid service.
- o Please provide H₂S emissions for the tank(s).
- O Please provide information, and documentation if available, on the H₂S sample (i.e., was this done separately in the field, and what method was used?)

Within six months from the date of this letter you may resubmit, with appropriate corrections, a revised PBR registration without any additional fee. The re-submittal should include:

- an updated Form PI-7 (Registration for Permits by Rule),
- the additional information, and
- a cover letter noting the package is in response to a deficiency notice and including permit number 72355.

Mr. Scott Carrell Page 2 September 12, 2008

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Re: Permit by Rule Registration Number 72355

To expedite the process, any re-submittal should be sent directly to the Texas Commission on Environmental Quality (TCEQ), Air Permits Initial Review Team (MC-161), P.O. Box 13087, Austin, Texas 78711-3087. After the six-month period referred to above has lapsed, an additional fee will be required to reactivate this project.

If, within six months from the date of this letter, you find that you cannot meet the conditions of the PBR, you may apply for a permit or amendment using the Form PI-1 (General Application for Air Preconstruction Permits and Amendments) to the same address and apply the fee for this request to that application by referring to Receipt Number R847562.

You are reminded that the Texas Health and Safety Code §§ 382.0518(a) and 382.057 require that a permit be obtained, or permit by rule, be fully complied with before work is begun on the construction of a new facility, or modification of an existing facility, that may emit air contaminants. Since we cannot confirm your claim, construction should not be started on the proposed project.

Your cooperation in this matter is appreciated. If you have any questions concerning this permit by rule, please contact Ms. Donna Wurst at (512) 239-5258 or write to the Texas Commission on Environmental Quality, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-163), P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,

Anne M. Inman, P.E., Manager

Rule Registrations Section

Air Permits Division

Texas Commission on Environmental Quality

cc: Air Section Manager, Region 7 - Midland

Project Number: 139966





APIRT

FEB 1 1 2009

BP America Production Company 501 WestLake Park Boulevard Houston TX 77079

P.O. Box 3092 M/S 2.102B Houston TX 77253-3092

January 22, 2009

Texas Commission on Environmental Quality Permits Administrative Review Section, MC 161 P. O. Box 13087 Austin, Texas 78711-3087

CERTIFIED MAIL 7006 0100 0005 8603 2688

Re: Update PBR Registration No. 72355 Increased Throughputs Schrock WM No. 38 Battery (RN104299359) Customer No. CN600129373

Midkiff, Glasscock County

Dear Sir or Madam:

Pursuant to 30 TAC §106.352, BP America Production Company claimed a permit by rule (PBR) for the construction of the Schrock, WM No. 38 Battery located near Midkiff, Glasscock County, Texas. BP America Production Company received authorization for coverage for this facility under 30 TAC §106.352 in a letter from TCEQ dated June 22, 2004. BP America Production Company notified TCEQ of increases in oil and water throughputs at the facility from the original authorization in a letter dated July 23, 2008. BP America Production respectfully requests that the July 23, 2008 PBR document be replaced with the enclosed document. The enclosed, revised PBR package provides a more recent H₂S gas sample result for the Schrock facility and corresponding emission estimates for the site.

The following submittal is a complete submittal in response to additional information requested by Donna Wurst in the Rule Registration Section on September 12, 2008.

- Flow Diagram See the attached process flow diagram for the equipment and emission points
- Blowdown tank information See the attached process description paragraph
- H₂S emissions have been estimated in the attached fugitive emission estimates
- H₂S emissions have been included in the attached E&P Tank runs
- H₂S sample information for the oil is sampled by our field personnel upon request. The oil sampling company does not test for H₂S due to their equipment limitations. The sample is tested separately, and H₂S mole percent is normalized into the final oil output (see the Pressurized Liquid H₂S Corrections page)

The Schrock WM No. 38 Facility is not an existing major source of any pollutant, and operations at the facility will not result in emissions exceeding any major source thresholds. Therefore, Prevention of Significant Deterioration review does not apply.

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FEB 1 1 2009





BP America Production Company 501 WestLake Park Boulevard Houston TX 77079

P.O. Box 3092 M/S 2.102B Houston TX 77253-3092

The registration fee (TCEQ receipt R847562) and a copy of the PI-7 were previously sent to the Revenue Section, and a copy of this PBR package is being sent to the TCEQ regional office in Midland. If you have any questions regarding this registration, please contact me at (281) 366-8431.

Sincerely,

Scott Carrell Air Quality Specialist

CC: Ms. Alice Cone, Regional Air Section Manager CERTIFIED MAIL 7006 0100 0005 8603 2695

TCEQ, Region 7

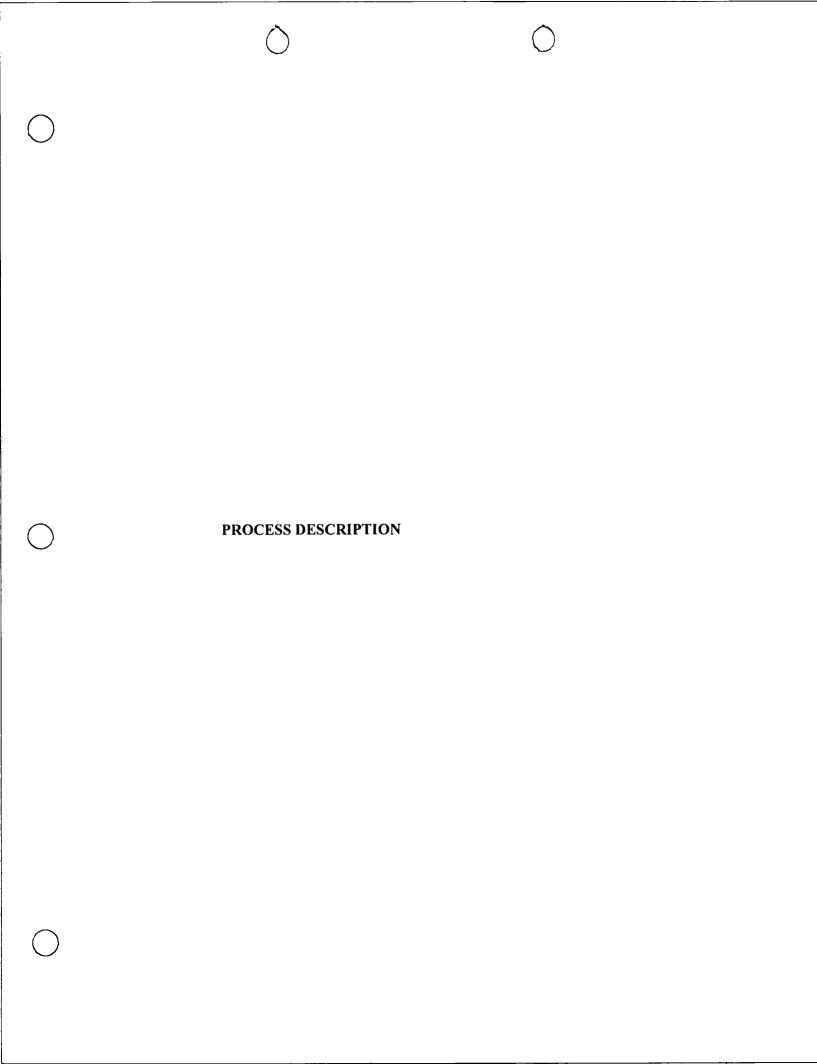
3300 N. A St., Bldg. 4-107 Midland, TX 79705-5451

Ms. Margaret Lowe, BP Permian Asset

APIRT FEB 1 1 2009 PI-7-CERT

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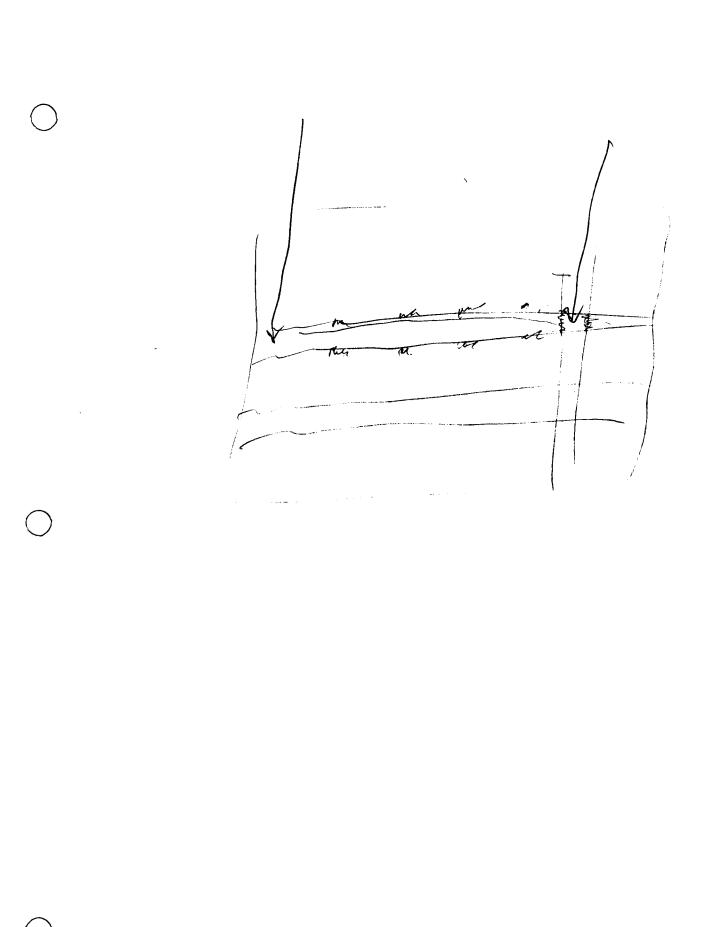
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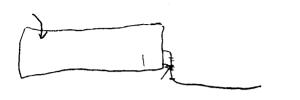


BP American Production Company Schrock, WM. 38 Battery Process Description

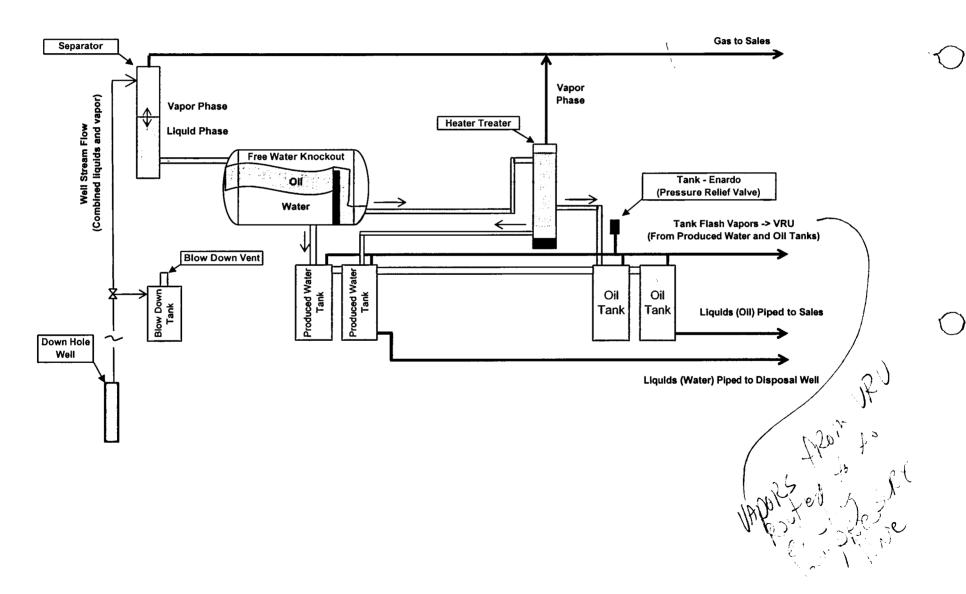
Produced fluids and gas from wells is sent via pumping units and flow lines into the onsite Schrock 38 Battery. Production is routed through a vertical 2-phase separator where gas is stripped and sent to sales, and emulsion is pumped to a free water knockout separator where water is separated from the oil. There are currently two 500 bbl oil and two 500 bbl water tanks on site. Water is sent to the saltwater disposal (SWD) storage on location, while oil is sent to the heater/treater for removal of any remaining water/gas. Gas from the heater is sent to sales. Oil is collected and stored onsite until it is sold by LACT unit.

The emissions from the oil and water tanks are controlled by VRU, which assumes a conservative 99.9 percent control efficiency. Water is disposed of by pumping to one of two SWD wells. A vent is used to periodically depressurize the gas gathering system to atmosphere in order to safely facilitate maintenance activities. The amount of gas released will vary depending on the distance between the nearest shutoff valves in the pipeline, inside diameter of the pipes, and pressure and temperature that day. However, the gas release is not expected to exceed 290,000 scf/day and result in much less than the 0.27 lb/hr limit authorized in 30 TAC 106.352(4) for a 20 ft emission stack.





Process Flow Diagram



CHECKLISTS: 106.4 CHECKLIST 106.352 CHECKLIST

> APIRT FEB 1 1 2009



Texas Commission on Environmental Quality Permit by Rule Applicability Checklist

Title 30 Texas Administrative Code § 106.4

Electronic Submittal - Only enter the PI-7 confirmation number here _______ if submitting electronically. Hard-Copy Submittal - Print and complete this checklist.

The following checklist was developed by the Texas Commission on Environmental Quality (TCEQ), Air Permits Division, to assist applicants in determining whether or not a facility meets all of the applicable requirements. Before claiming a specific Permit by Rule (PBR), a facility must first meet all of the requirements of Title 30 Texas Administrative Code § 106.4 (30 TAC § 106.4), "Requirements for Permitting by Rule." Only then can the applicant proceed with addressing requirements of the specific Permit by Rule being claimed.

The use of this checklist is not mandatory; however, it is the responsibility of each applicant to show how a facility being claimed under a PBR meets the general requirements of 30 TAC § 106.4 and also the specific requirements of the PBR being claimed. If all PBR requirements cannot be met, a facility will not be allowed to operate under the PBR and an application for a construction permit may be required under 30 TAC § 116.110(a).

Registration of a facility under a PBR can be performed by completing Form PI-7 (Registration for Permits by Rule) or Form PI-7-CERT (Certification and Registration for Permits by Rule). The appropriate checklist should accompany the registration form. Check the most appropriate answer and include any additional information in the spaces provided. If additional space is needed, please include an extra page and reference the question number. The PBR forms, tables, checklists and guidance documents are available from the TCEQ. Air Permits Division Web site at: www.tceq.state.tx.us/permitting/air/nav/air_pbr.html

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vi recommende i crimis revien musi de completeu lo ulunor de trus project. Il 190, continue lo section 3.		I		
	Tronaudanment i ermit review mills to Completed to diumorize this project. IJ NO, Continue to Section 3.			





3. 30 TAC § 106.4(a)(3): Prevention of Significant Deterioration (PSD) check Does this project trigger a review under PSD rules? To determine the answer, review the information below: Are emissions of any regulated criteria pollutant increasing by 100 tpy of any criteria pollutant at a named source?				
Are emissions of any regulated criteria pollutant increasing by 100 tpy of any criteria pollutant at a named source?				
		vec		NO
Are emissions of any criteria pollutant increasing by 250 tpy of any criteria pollutant at an unnamed source?		YES YES		
Are emissions increasing above significance levels at an existing major site?		YES	_	
and the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of th			_	
PSD information can be found at:				
www.tceq.state.tx.us/permitting/air/forms/newsourcereview/tables/nsr_table9.html and				
www.tceq.state.tx.us/permitting/air/nav/air_docs_newsource.html				
If "Yes," to any of the above, a PBR may not be used . A PSD Permit review must be completed to authorize the project.				
If "No," continue to Section 4.				
4. 30 TAC § 106.4(a)(6); Federal Requirements	VEC	V/O	Ų.	1/4
• Will all facilities under this PBR meet applicable requirements of Title 40 Code of Federal Regulations (40 CFR) Part 60, New Source	YES	NO	Δ	N/A
Performance Standards (NSPS)? If "Yes," which Subparts are applicable?:				
 Will all facilities under this PBR meet applicable requirements of 40 CFR Part 63, Hazardous Air Pollutants Maximum Achievable 	YES	NO	X	N/A
Control Technology (MACT) standards? If "Yes," which Subparts are applicable?:				
Control (Centrology (MACC)) standards. If Yes, which supplies the applicable				
will all facilities under this PBR meet applicable requirements of 40 CFR Part 61, National Emissions Standards for Hazardous Air	YES	NO	X	N/A
Pollutants (NESHAPs)? If "Yes," which Subparts are applicable?:				
Makadilatia sahalikata a hadaan, akah addikada asaa sa asabat Mahadilatia sahalikat da da da da da da da da da da da da da				
If checklist is submitted as a hard copy, attach additional pages as needed, if checklist is submitted electronically, please email attachment to the following address: apolitives, state to us				
If "Yes" to any of the above, please attach a discussion of how the facilities will meet any applicable standards.				
5. 30 TAC § 106.4(a)(7): PBR prohibition check			_	
Are there any air permits at the site containing conditions which prohibit or restrict the use of PBRs?		YES	x	NO
are the any an periods at the site containing containous which promote or restrict the use of 1 Drs.		1 25	Δ	
if "Yes," PBRs may not be used or their use must meet the restrictions of the permit. A new permit or permit amendment may be				
required. List permit number(s):				
If "No," continue to Section 6.				
6. 30 TAC § 106.4(a)(8); NO. Cap and Trade				
Is the facility located in Harris, Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, or Waller County?		YES	X	NO
If "Yes," answer the question below. If "No," continue to Section 7.			4	
Will the proposed facility or group of facilities obtain required allowances for NO₁ if they are subject to 30 TAC Chapter 101.		YES		NO
Subchapter H, Division 3 (relating to the Mass Emissions Cap and Trade Program)?				
Substitute 11, Division 5 (Icianing to the Plass Emissions Cap and Flade Flogram).				
Duversaper 11, Division 5 (telating to the mass canasions cap and made i togram).				
7. Highly Reactive Volatile Organic Compounds (HRVOC) check				
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Title 30 Texas Administrative Code §106.352 Permits by Rule (PBR) Checklist Oil and Gas Production Facilities

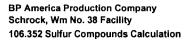
Electronic Submittal - Complete this document and attach to Email along with PI-7 submittal Hard-Copy Submittal - Print and complete the following checklist and attach to PI-7 submittal

The following checklist is designed to help you confirm that you meet Title 30 Texas Administrative Code § 106.352 (30 TAC § 106.352) requirements. If you do not meet all the requirements, you may alter the project design or operation in such a way that all the requirements of the PBR are met or you may obtain a construction permit. The PBR forms, tables, checklist and guidance documents are available from the Texas Commission on Environmental Quality (TCEQ), Air Permits Division Web site at www.tceq.state.tx.us/nav/permits/air_permits.html.

PLEASE CHECK THE MOST APPROPRIATE ANSWER.				
Check the type of facilities covered by this registration (check all that are applicable):	X	Oil o facilit	r gas pr y	oduction
		Carbo		dioxide
			ation faci	
		Oil	or gas	pipeline
		facilit	у	
		X	YES	NO
The facilities at the site include (check all that apply): sulfur recovery units				
\underline{X} one or more tanks \underline{X} separators \underline{X} free water knockouts				
gunbarrels X_heater treaters dehydration units				
gas sweetening & other gas conditioning facilities natural gas liquids recovery units		1		
Will gas sweetening, sulfur recovery, or other gas conditioning facilities only condition gas that contains less than two (2) long tons per day of sulfur compounds as sulfur?		X	YES	NO
Do all compressors and flares fully meet the requirements of 30 TAC § 106.512 and 30 TAC §		\top	YES	NO
106.492, respectively? Attach data showing how the exemptions are met. Checklists are available.			(X N	<u>(A)</u>
Are total emissions from all facilities, including fugitives and loading emissions, less than 25 tpy SO2, VOC, or 250 tpy of CO or NOx?		X	YES	NO
Have you attached calculations and other data, such as a gas analysis, showing that the emissions limits of the general rule are met?		X	YES	NO
If the facility handles sour gas, is it located at least 1/4 mile from any recreational area, residence,		X	YES	NO
or other structure not occupied or used solely by the owner or operator of the facility or the owner		1	<u>_ N</u>	<u>(A)</u>
of the property upon which the facility is located? Attach a scaled map.				
Are total emissions of sulfur compounds, excluding sulfur oxides, less than 4.0 pounds per hour?		X	YES	NO
Attach calculations.			<u>N</u>	<u>IA)</u>
Does the height of each vent emitting sulfur compounds meet or exceed the minimum vent height		X	YES	NO
stated in 30 TAC § 106.352? List stack height: The common tank vent is assumed		1	\square	IA)
to emit H2S since a sample collected indicated the presence of H2S in the gas analysis. The		1		
common tank vent is 20 feet tall. The blow down vent height is also at least 20 feet above		1		
grade.				

TCEQ - 10128 (Revised 10/04) PBR Checklist for Oil and Gas Production Facilities This form for use by facilities subject to air quality permit requirements and may be revised periodically (APDG 5026v4)

APIRT FEB 1 1 2009



Calculation information:

Max Inlet H2S Concentration:

118.00 ppm =

Max Inlet Natural Gas Flowrate: Molecular Weight of Sulfur:

0.290 mmscf / day 32.06 lb / lb-mole

Gas Constant1: 385.40 scf / lb-mole

Sulfur (long ton) = 0.3 mmscf/day * 0.0118 % H2S / 385.4 scf/lbmole * 34.08 lb/lbmol * 10^6 Scf/1 MMScf * (32.06 lb/lbmole S / 34.08 lb/lbmole H2S) * 1 long ton/2240 lbs = 0.0000 long tons/day

0.01180%

Sulfur =

0.000013

long tons/day

0.0012 lbs/hr

For gas mol-volume conversion, assume T = 68°F and P=14.7 psia.->> C = 385.40

This spreadsheet calculates corrected mol % of the gas to include H2S

H2S Concentration: 118.00 ppm H2S Calculated Molecular Weight of 25.038 Based on lab analysis dated: 6/13/08

6	Molecular Weight	Mataba 9/	Welghted Average		Corrected Mol % (w/ H2S)
Component		Weight %		Mol %	<u> </u>
N2	28.01000	1.86%	0.465	1.659%	1.659%
H2	2.02000	0.00%	0.000	0.000%	0.000%
Helium	4.00260	0.00%	0.000	0.000%	0.000%
CO2	44.01000	0.73%	0.183	0.415%	0.415%
H2S	34.07580	0.02%	0.004	0.012%	0.012%
Methane	16.04000	43.53%	10.898	67.942%	67.942%
Ethane	30.07000	14.73%	3.687	12.263%	12.263%
Propane	44.10000	16.80%	4.205	9.536%	9.536%
I-Butane	58.12000	2.06%	0.515	0.886%	0.886%
N-Butane	58.12000	7.65%	1.915	3.295%	3.295%
I-Pentane	72.15000	2.55%	0.638	0.884%	0.884%
N-Pentane	72.15000	3.10%	0.778	1.076%	1.076%
Hexanes +	86.18000	7.00%	1.752	2.033%	2.033%
Heptanes	100.20340	0.00%	0.000	0.000%	0.000%
Octanes	114.23000	0.00%	0.000	0.000%	0.000%
Nonanes	128.28000	0.00%	0.000	0.000%	0.000%
C10+	217.30000	0.00%	0.000	0.000%	0.000%
Benzene	78.11000	0.00%	0.000	0.000%	0.000%
Toluene	92.13000	0.00%	0.000	0.000%	0.000%
Ethyl Benzene	106.17000	0.00%	0.000	0.000%	0.000%
Xylenes	106.17000	0.00%	0.000	0.000%	0.000%
N-Hexane	86.18000	0.00%	0.000	0.000%	0.000%
TOTAL	I I	100.00%	25.04	100.00%	99.99%
% of THC					100.00%
VOC	(C3+)	39.15%			17.71%

Schrock WM No. 38 Battery Gas Analysis from 06/13/2008

		MW	Component	Wt %
Componer	Mole %	lb/lb-mole	lb/lb-mole	Gas Stream
Helium	0.000%	4.003	0.000	0.000%
H2	0.000%	2.020	0.000	0.000%
H2S	0.0118%	34.076	0.004	0.016%
N2	1.659%	28.010	0.465	1.856%
CO2	0.415%	44.010	0.183	0.729%
C1H4	67.942%	16.040	10.898	43.526%
C2H6	12.263%	30.070	3.687	14.727%
C3H8	9.536%	44.100	4.205	16.796%
iC4H10	0.886%	58.120	0.515	2.056%
nC4H10	3.295%	58.120	1.915	7.648%
iC54H12	0.884%	72.150	0.638	2.547%
nC5H12	1.076%	72.150	0.776	3.100%
C6H14	2.033%	86.180	1.752	6.997%
C7H16+	0.000%	100.203	0.000	0.000%
	100.0%		25.04	100.0%
	Wt % of To	OC Gas Stream tha	t is VOC (C3+)	39.15%

EMISSIONS INFORMATION: SITE EMISSIONS SUMMARY EMISSIONS CALCULATIONS

> APIRT FEB 1 1 2009

BP America Production Company Schrock, Wm No. 38 Facility Site Emissions Summary (200 BOPD, and 1250 BWPD)

Jor	ion's
*	

	Emissions (tpy)							
Description		NO _x	CO	PM	SO ₂	VOC	H₂S	Formaldehyde
Oil Tanks						13.7662	0.0233	-
Produced Water Tanks						1.3294		
Vent				-		6.2186	0.0026	-
Heater		0.2147	0.1804	0.0163	0.0478	0.0118		0.0002
Fugitives in Liquid Service		-				2.5460	0.0003	-
Fugitives in Gas Service						0.6241	0.00026	-
							,	
	Total	0.2147	0.1804	0.0163	0.0478	24.4961	0.0264	0.0002

Note: Lube oil emissions are negligible- vp < 0.1 mmHg Loading is performed by a 100% efficient LACT unit. VRU recovery efficiency is estimated to be 99.9% BP America Production Company Schrock, Wm No. 38 Facility Oil and Produced Water

Source Information For Oil

Daily Throughput (site)	200 Bbl/day
Monthly Throughput (site)	6,083 Bbl/month
Annual Throughput (site)	73,000 Bbl/yr
Product Stored	Oil
Control Device	VRU
Recovery Efficiency	99.9%

Emissions from E&P Tanks¹

ECP 1,

		Total Emis	ssions	VRU Controlled		
Comp	onent	(lb/hr)	(tpy)	(lb/hr)	(tpy)	
H2S	H2\$	0.063	0.275	0.000	0.000	
Propane	C3	19.271	84.406	0.019	0.084	
Iso-Butane	IC4	2.024	8.863	0.002	0.009	
Normal Butane	NC4	7.524	32.954	0.008	0.033	
Iso-Pentane	IC5	1.793	7.855	0.002	0.008	
Normal Pentane	NC5	2.419	10.595	0.002	0.011	
Hexane	C6	1.694	7.419	0.002	0.007	
Heptane	C7	0.984	4.309	0.001	0.004	
Octane	C8	0.236	1.033	0.000	0.001	
Nonane	C9	0.06	0.261	0.000	0.000	
Decane	C10+	0	0.000	0.000	0.000	
Benzene	Benzene	0.075	0.328	0.000	0.000	
Toluene	Toluene	0.051	0.224	0.000	0.000	
Ethyl Benzene	E-Benzene	0.011	0.046	0.000	0.000	
Xylenes	Xylenes	0.023	0.102	0.000	0.000	
n-Hexane	n-C6	0.409	1.791	0.000	0.002	
Tota	I Uncontrolled VOC	36.574	160.186	0.037	0.160	

¹ See attached E&P Tank run

VRU Operation Assumption

Pollutant	Potenitial Uncontrolled Emissions (lb/hr)	Rolling 12 Month VRU Uncontrolled Time (hrs)	Rolling 12 Month Emissions (tpy)
VOC	36.574	744	13.606
H2S	0.063	744	0.023

Uncontrolled time is due to routine VRU shutdowns as a result of sensor replacements, weight adjustments, power outages in remote locations, enardo valve maintenance, etc.

Source Information For Produced Water

Tank Type	Fixed Roof
Daily Throughput (site)	1250 Bbl/day
Monthly Throughput (site)	38,021 Bbl/month
	52,500 gal/day
Emission Factor*	925 lb VOC/MMgal produced
Control for fixed roof tank*	85%

*From *Technical Guidance Document to the Criteria & Guideline regulations for AB 2588: Air Toxics Hot Spots Information and Assessment Act of 1987. Emissions factors used in BID for MACT (unpublished)*

Emission Rate

21111331011 11410						
Pollutant	avg lb/hr	max lb/hr	tpy			
VOC	0.3035	1.2141	1.3294			

Note: Vapors from Produced Water Tanks are also captured by VRU. However, no VOC reduction credits are being claimed for this permit.

Sample Calculations

VOC (lb/hr) = (925 lb VOC/ 1,000,000 gal) x (1250 gal/day) x (day/24 hr) x (1-0.85)

BP America Production Company
Schrock, Wm No. 38 Facility
Oil Comparison when RVP Distillation Column option is selected within E&P Tanks

Source Informa For Oil

Daily Throughput	200 Bbl/day		
Monthly	6,083 Bbl/month		
Annual	73,000 Bbl/yr		
Product Stored	Oil		
Control Device	VRU		
Recovery Efficient	99.9%		

(200 bopd reduce to 100 bopd using linear ratio vs. two separate 100 bopd E&P Runs)

	E&P Run (200 bopd)		Linear Rati	o Test Case	Scenario		E&P Run (10	0 bopd)	
No	Component	200 Uncontrolled [ton/yr]	BOPD Uncontrolled [lb/hr]	Component	100 Incontrolled [ton/yr]	BOPD Incontrolled (lb/hr)	Component	100 Uncontrolled [ton/yr]	BOPD Uncontrolled
H2S	lH2S	0.275	0.063	H2S	0.1375	0.0315	H2S	0.138	0.032
Oxygen	02	0	0	O2	0	0	O2	0	0
Carbon Dioxide	CO2	0	0	CO2	0	0	CO2	0	0
Nitrogen	N2	0	0	N2	0	0	N2	0	0
Methane]C1	8.228	1.879	C1	4.114	0.9395	C1	4.114	0.939
Ethane]C2	25.672	5.861	C2	12.836	2.9305	C2	12.836	2.931
Propane	C3	84.406	19.271	C3	42.203	9.6355	C3	42.203	9.635
Iso-Butane	i-C4	8.863	2.024	i-C4	4.4315	1.012	i-C4	4.431	1.012
Normal Butane	n-C4	32.954	7.524	n-C4	16.477	3.762	n-C4	16.477	3.762
Iso-Pentane	i-C5	7.855	1.793	i-C5	3.9275	0.8965	i-C5	3.927	0.897
Normal Pentane	n-C5	10.595	2.419	n-C5	5.2975	1.2095	n-C5	5.298	1.21
Hexane	C6	7.419	1.694	C6	3.7095	0.847	C6	3.71	0.847
Heptane	C7	4.309	0.984	C7	2.1545	0.492	C7	2.155	0.492
Octane	C8	1.033	0.236	C8	0.5165	0.118	C8	0.516	0.118
Nonane	C9	0.261	0.06	C9	0.1305	0.03	C9	0.13	0.03
Decane	C10+	0	0	C10+	0	0	C10+	0	0
Benzene	Benzene	0.328	0.075	Benzene	0.164	0.0375	Benzene	0.164	0.037
Toluene	Toluene	0.224	0.051	Toluene	0.112	0.0255	Toluene	0.112	0.026
Ethyl Benzene	E-Benzene	0.046	0.031	E-Benzene	0.023	0.0055	E-Benzene		0.005
Xylenes	Xylenes	0.102	0.023	Xvienes	0.051	0.0115	Xylenes	0.051	0.012
n-Hexane	n-C6	1.791	0.409	n-C6	0.8955	0.2045	n-C6	0.896	0.205
	224Trimethy		0	224Trimethylp	0	0	224Trimethy	0	0
	Total	194.361	44.375	Total	97.1805	22.1885	Total	97.181	22.187
	VOC (E&P)	160.186	36.574	VOC Ratio	80.093	18.287	VOC (E&P	80.093	18.288
	Total HC	194.361	44.377	VOC E&P	80.093	18.288	Total HC	97.181	22.19

Revised_Schrock_Wm_No_38_Calcs_200_bopd_New_Sample_118_H2S.xls TanksTemplate with VRU Tab

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1/21/2009

Blow Down Tank Venting

BP America Production Company Schrock, Wm No. 38 Facility Description: **Blow Down Tank**

Venting days:

40 hrs/yr

Total Volume of gas vented:

290,000 scf/day

H2S Concentration:

118 ppm H₂S

Calculated Molecular Weight of Gas:

25.038

Based on Schrock Wm No. 38 lab analysis dated 6/13/2008:

Component	Molecular Weight	Weight %	Weighted Average	_Mol_%	Corrected Mol % (w/ H2S)	Speciated Emissions, lbs/d
Helium	4.003	0.000%	0.000	0.000%	0.000%	0.00
H2	2.020	0.000%	0.000	0.000%	0.000%	0.00
N2	28.01	1.856%	0.465	1.659%	1.659%	353.79
CO2	44.01	0.729%	0.183	0.415%	0.415%	
H2S	34.08	0.016%	0.004	0.0118%		
Methane	16.04	43.531%	10.899	67.942%	67.942%	
Ethane	30.07	14.726%	3.687	12.263%	12.263%	2,807.55
Propane	44.09	16.794%	4.205	9.536%	9.536%	3,201.71
I-Butane	58.12	2.056%	0.515	0.886%	0.886%	392.06
N-Butane	58.12	7.648%	1.915	_3.295%	3.295%	1,458.05
I-Pentane	72.15	2.547%	0.638	0.884%	0.884%	485.57
N-Pentane	72.15	3.100%	0.776	1.076%	1.076%	591.04
Hexanes plus	86.18	6.997%	1.752	2.033%	2.033%	1,333.93
Heptanes	100.20	0.000%	0.000	0.000%	0.000%	0.00
Octanes	114.23	0.000%	0.000	0.000%	0.000%	0.00
Nonanes	128.28	0.000%	0.000	0.000%	0.000%	0.00
C10+	217.30	0.000%	0.000	0.000%	0.000%	0.00
Benzene	78.11	0.000%	0.000	0.000%	0.000%	0.00
Toluene	92.14	0.000%	0.000	0.000%	0.000%	0.00
Ethylbenzene	106.17	0.000%	0.000	0.000%	0.000%	
m-Xylenes	106.17	0.000%	0.000	0.000%	0.000%	0.00
o-Xylene	106.17	0.000%	0.000	0.000%	0.000%	0.00
N-Hexane	86.18	0.000%	0.000	0.000%	0.000%	0.00
Total VOC (C3+)		39.142%		_		7,462.35
TOTAL		100.000%	25.04	100.00%	100.00%	

Total VOC's:	310.93 lbs/hr	6.22 tons/yr
H2S Emissions:	0.13 lbs/hr	0.0026 tons/yr

Vent Height Calculations:

From 30 TAC 106.352 and emissions = 0.01 lbs/hr H2S :

Per	30	TAC	106	.352	4):

Total as H2S (lb/hr)	Min Vent Ht (ft)		Stack Height (ft)	H ₂ S Emissions (lbs/hr)
0	_ 0		0	0
0.27	20		20	0.27
			30	0.6
Vent Ht (ft) =	Interpolate => (20	-0)/(0.27 - 0) = 74.07 = ((20 - x)/(0.27 - 0.13)	50	1.94
Vent Ht (ft) =	9.451	_	60	3
Vent Ht (ft) =	9.451	Min Stack Height is 20 ft	68	4

Example Calculations³:

Emissions (lbs) 1= Q,scf x MW, lb_c/lb-mole_c x mol%, lb-mole_c/lb - mole_a x 1/C, lb-mole_c/scf

Notes:

- For gas mol-volume conversion, assume T = 60°F and P=14.65 psia.->> 380.86
- ² Numbers shown in red are input values.
- ³ Emission Inventory Improvement Program, Preferred and Alternative Methods of Estimating
- Air Emissions from Oil and Gas Field Production and Processing Operations,
- Displacement Equation, Equation 10.4-3, September 1999

using SG of gas and 28.96 lb/lbmol air

0.578

12745.56 lb

5122.07 lb VOC

Displacement Equation, Equation 10.4-3, September 1999

BP America Production Company Schrock, Wm No. 38 Facility 0.5 MMBTU/hr Reboiler

Source Information:

Rating	0.5	MMBtu/hr
Hours of Operation	8760	hr/yr
Heating Value	1020	Btu/scf
Fuel Consumption ¹	4.2941	MMscf/yr

Criteria Pollutant Emissions Calculations:

Pollutant	Emission Factor ²	Units	Emission (lb/hr)	Emissions (tpy)
NO _X ²	100.0	lb/MMscf	0.0490	0.2147
CO ²	84.0	lb/MMscf	0.0412	0.1804
VOC ²	5.5	lb/MMscf	0.0027	0.0118
SO₂³	22.3	lb/MMscf	0.0109	0.0478
PM ²	7.6	lb/MMscf	0.0037	0.0163
Formaldehyde ²	0.0750	lb/MMscf	0.00004	0.0002

Example Calculations:

PM Emissions (lb/hr) = PM Emissions (tpy) =

0.50 MMBtu/hr / 1020 MMBtu/MMscf * 7.6 lb/MMscf = 0.0037

0.0037 lb/hr * 8760 * 1 Ton/2000 lb = 0.0163

¹ The fuel consumption is based on a conservative estimation.

² Based on AP-42, Fifth Edition, Volume 1, Chapter 1, Section 1.4, Table 1.4-1 and 1.4-2 (7/98)

³ Note: Based on 100% conversion of fuel sulfur to SO2. AP-42 factor of 0.000588 lb/MMBtu assumes sulfur content in natural gas of 2,000 grains/10⁶ scf (= 3.18 ppm H₂S). Emission factor is converted to other natural gas sulfur contents by multiplying the SO₂ emission factor by the ratio of the site-specific sulfur content (118 ppm) to the 3.18 ppm.

BP America Production Company Schrock, Wm No. 38 Facility **Fugitives in Liquid Service**

Source Information:

Component	Component Count ³	THC Emission Factor (lb/hr/component) ¹	TOC Emissions (tpy)
Compressor	0	0.016500	0.0000
Connector	300	0.000463	0.6084
Flange	5	0.000243	0.0053
Open-ended Line	0	0.00309	0.0000
Other	3	0.0165	0.2168
Pump	1	0.02866	0.1255
Relief Valve	0	0.01650	0.0000
Valve	66	0.0055	1.5899
		Total	2.5460

Criteria Pollutant Emissions Calculations:

Pollutant	Vapor Weight% ²	Emissions (lb/hr)	Emissions (tpy)
VOC	100.00%	0.5813	2.5460
H2S	0.0118%	0.00007	0.0003

¹ TCEQ's "Air Permit Technical Guidance for Chemical Sources: Equipment Leak Fugitives", Facility/Compound Specific Emission Factors table, Oil and Gas Production Operations Factors, October 2000.

² Based on conservative assumption that 100% THC is VOC

³ Based on counts from FEC.

BP America Production Company Schrock, Wm No. 38 Facility **Fugitives in Gas Service**

Source Information:

Component	Component Count ³	THC Emission Factor (lb/hr/component) ¹	TOC Emissions (tpy)
Compressor	0	0.0194	0.0000
Connector	151	0.00044	0.2910
Flange	5	0.00086	0.0188
Open-ended Line	0	0.00441	0.0000
Other	7	0.0194	0.5948
Pump	0	0.00529	0.0000
Relief Valve	3	0.01940	0.2549
Valve	10	0.00992	0.4345
		Total	1.5941

Criteria Pollutant Emissions Calculations:

Pollutant	Vapor Weight% ²	Emissions (lb/hr)	Emissions (tpy)
VOC	39.15%	0.1425	0.6241
H2S	0.0161%	0.000058	0.00026

¹ TCEQ's "Air Permit Technical Guidance for Chemical Sources: Equipment Leak Fugitives", Facility/Compound Specific Emission Factors table, Oil and Gas Production Operations Factors, October 2000.

Based on 6/13/2008 Schrock, Wm No. 38 Fuel Gas Analysis VOC wt%

Schrock WM No. 38 Battery Gas Analysis from 06/13/2008

		MW	Component	Wt %
Component	Mole %	lb/lb-mole	lb/lb-mole	Gas Stream
Helium	0.000%	4.00	0.000	0.00%
H2	0.000%	2.02	0.000	0.00%
N2	1.659%	28.01	0.465	1.86%
CO2	0.415%	44.01	0.183	0.73%
H2S	0.0118%	34.08	0.004	0.0161%
C1H4	67.942%	16.04	10.898	43.53%
C2H6	12.263%	30.07	3.687	14.73%
C3H8	9.536%	44.10	4.205	16.80%
iC4H10	0.886%	58.12	0.515	2.06%
nC4H10	3.295%	58.12	1.915	7.65%
iC54H12	0.884%	72.15	0.638	2.55%
nC5H12	1.076%	72.15	0.776	3.10%
C6H14	2.033%	86.18	1.752	7.00%
C7H16+	0.000%	100.20	0.000	0.00%
	100.000%		25.04	100.00%
		Wt % of TOC Ga	s Stream that is VOC (C3+)	39.15%

³ Based on counts from the FEC.

E&P TANK RUN

*******	*************
* Project Setup 1	Information *
******	**************
Project File	: I:\Permian\Schrock_WM_38\2009_01_21_106.8_Recordkeeping\Final_200_bopd\E_P_Tanks\20
Flowsheet Selection	: Oil Tank with Separator
Calculation Method	: RVP Distillation
Control Efficiency	: 100.0%
Known Separator Stream	am : Low Pressure Oil
Entering Air Composit	tion : No
Filed Name	: Spraberry
Well Name	: Schrock 38
Well ID	: 11/05/03 Lane 37 representative oil analysis
Date	: 2008.11.20

* Data Input	*
******	**************
Separator Pressure	: 26.00[psig]
Separator Temperature	
Ambient Pressure	: 13.282[psia]
Ambient Temperature	: 63.30[F]
C10+ SG	: 0.7820
C10+ MW	: 252.33
Low Pressure Oil	
No. Component	mol %
1 H2S	0.0118
2 02	0.0000
3 CO2	0.0000
4 N2	0.0000
5 C1	0.7420
6 C2	1.2380
7 C3	3.3880
8 i-C4	0.7600
9 n-C4	4.3000
10 i-C5	2.4410
11 n-C5	4.4420
12 C6	9.0430
13 C7	13.9870
14 C8	9.5090
15 C9	6.1620
16 C10+	37.4542
17 Benzene	0.5250
18 Toluene	1.1010
19 E-Benzene	0.6110
20 Xylenes	1.5540
21 n-C6	2.7310
22 224Trimeth	ylp 0.0000
Sales Oil	
	: 200[bbl/day]
Days of Annual Opera	tion : 365 [days/year]
API Gravity	: 37.9
Reid Vapor Pressure	: 5.90[psia]
* Calculation Re	**************************************
n -11	
	oncontrolled oncontrolled

Tot	al HAPs al HC	2.490 194.087	0.568 44.312					
VOC	s, C2+	185.859	42.434					
VOC	s, C3+	160.187	36.572					
Unc	ontrolled Recover	_						
	Vapor	9.2100	[MSCFD]					
	HC Vapor	9.2000	[MSCFD]					
	GOR	46.05	[SCF/bbl]					
:	Emission Composi	tion						
No	Component	Uncontrolled		led				
_		- · · - ·	[lb/hr]					
1	H2S	0.275	0.063					
2	02	0.000	0.000					
3	CO2	0.000	0.000					
4	N2	0.000	0.000					
5	C1	8.228	1.879					
6 7	C2	25.672	5.861					
	C3	84.406	19.271					
8	i-C4	8.863	2.024					
9	n-C4	32.954	7.524					
	i-C5	7.855	1.793					
	n-C5	10.595	2.419					
	C6	7.419	1.694					
	C7	4.309	0.984					
	C8	1.033	0.236					
	C9	0.261	0.060					
	C10+	0.000	0.000					
	Benzene	0.328	0.075					
	Toluene	0.224	0.051					
	E-Benzene	0.046	0.011					
	Xylenes	0.102	0.023					
	n-C6	1.791	0.409					
22	224Trimethylp Total	194.361	0.000 44.375					
	IULAI		44.5/5					
	Stream Data							
	Stream Data . Component		LP Oil			Flash Gas		
				Flash Oil	Sale Oil	Flash Gas mol %	W&S Gas	Total Emission
No.	. Component	MW	LP Oil mol %	Flash Oil mol %	Sale Oil mol %	Flash Gas mol % 0.1827	W&S Gas mol %	Total Emission: mol %
No. 1	. Component H2S	мw 34.80	LP Oil mol % 0.0118	Flash Oil mol % 0.0079	Sale Oil mol % 0.0001	Flash Gas mol % 0.1827	W&S Gas mol % 0.1818	Total Emissions mol % 0.1821
No. 1 2	H2S O2	MW 34.80 32.00	LP Oil mol % 0.0118 0.0000	Flash Oil mol % 0.0079 0.0000	Sale Oil mol % 0.0001 0.0000	Flash Gas mol % 0.1827 0.0000	W&S Gas mol % 0.1818 0.0000	Total Emissions mol % 0.1821 0.0000
No. 1 2 3	Component H2S O2 CO2	MW 34.80 32.00 44.01	LP Oil mol % 0.0118 0.0000 0.0000	Flash Oil mol % 0.0079 0.0000 0.0000	Sale Oil mol % 0.0001 0.0000 0.0000	Flash Gas mol % 0.1827 0.0000 0.0000	W&S Gas mol % 0.1818 0.0000 0.0000	Total Emission: mol % 0.1821 0.0000 0.0000
No. 1 2 3 4	H2S O2 CO2 N2	MW 34.80 32.00 44.01 28.01	LP Oil mol % 0.0118 0.0000 0.0000	Flash Oil mol % 0.0079 0.0000 0.0000	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000	W&S Gas mol % 0.1818 0.0000 0.0000 0.0000	Total Emission: mol % 0.1821 0.0000 0.0000 0.0000
No. 1 2 3 4 5	H2S O2 CO2 N2 C1	MW 34.80 32.00 44.01 28.01 16.04	LP Oil mol % 0.0118 0.0000 0.0000 0.0000 0.7420	Flash Oil mol % 0.0079 0.0000 0.0000 0.0000 0.1466	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676	W&S Gas mol % 0.1818 0.0000 0.0000 0.0000 3.4329	Total Emission: mol % 0.1821 0.0000 0.0000 0.0000 11.5592
No. 1 2 3 4 5	H2S O2 CO2 N2 C1 C2	MW 34.80 32.00 44.01 28.01 16.04 30.07	LP Oil mol % 0.0118 0.0000 0.0000 0.0000 0.7420 1.2380	Flash Oil mol % 0.0079 0.0000 0.0000 0.0000 0.1466 0.7175	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785	W&S Gas mo1 % 0.1818 0.0000 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983	Total Emission: mol % 0.1821 0.0000 0.0000 0.0000 11.5592 19.2419
No. 1 2 3 4 5 6 7	H2S O2 CO2 N2 C1 C2 C3 i-C4	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10	LP Oil mol % 0.0118 0.0000 0.0000 0.7420 1.2380 3.3880	Flash Oil mol % 0.0079 0.0000 0.0000 0.0000 0.1466 0.7175 2.8445	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000 0.0000 0.0000 0.0030 0.6612	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543	W&S Gas mo1 % 0.1818 0.0000 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983	Total Emission mol % 0.1821 0.0000 0.0000 1.5592 19.2419 43.1399
No. 1 2 3 4 5 6 7 8 9	H2S O2 CO2 N2 C1 C2 C3 i-C4	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12	LP Oil mol % 0.0118 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410	Flash Oil mol % 0.0079 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401	Flash Gas mol % 0.1827 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802	W&S Gas mol % 0.1818 0.0000 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469	Total Emission mol % 0.1821 0.0000 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536
No. 1 2 3 4 5 6 7 8 9	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12	LP Oil mol % 0.0118 0.0000 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000	Flash Oil mol % 0.0079 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699	W&S Gas mol % 0.1818 0.0000 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661	Total Emission mol % 0.1821 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783
No. 1 2 3 4 5 6 7 8 9 10	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 n-C5	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12 72.15	LP Oil mol % 0.0118 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410	Flash Oil mol % 0.0079 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401	Flash Gas mol % 0.1827 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802	W&S Gas mol % 0.1818 0.0000 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469	Total Emission mol % 0.1821 0.0000 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536
No. 1 2 3 4 5 6 7 8 9 10 11	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 n-C5 C6	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12 72.15 72.15	LP Oil mol % 0.0118 0.0000 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420	Flash Oil mol % 0.0079 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401 4.5197	Flash Gas mol % 0.1827 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022	W&S Gas mol % 0.1818 0.0000 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213	Total Emission mol % 0.1821 0.0000 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097
No. 1 2 3 4 5 6 7 8 9 10 11 12 13	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 n-C5 C6	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12 72.15 72.15 86.16	LP Oil mol % 0.0118 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430	Flash Oil mol % 0.0079 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401 4.5197 9.5268	Flash Gas mol % 0.1827 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788	W&S Gas mol % 0.1818 0.0000 0.0000 3.4329 16.7365 53.4983 13.9661 2.5469 3.4213 2.0508	Total Emission mol % 0.1821 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906
No. 1 2 3 4 5 6 7 8 9 10 11 12 13 14	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 n-C5 C6	34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12 72.15 72.15 86.16 100.20	LP Oil mol % 0.0118 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430 13.9870	Flash Oil mol % 0.0079 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075 14.2867	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401 4.5197 9.5268 14.8778	Flash Gas mol % 0.1827 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788 0.9385	W&S Gas mol % 0.1818 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213 2.0508 1.0350 0.2179 0.0508	Total Emission mol % 0.1821 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906 1.0012 0.2097 0.0478
No. 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 n-C5 C6 C7 C8	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12 72.15 72.15 86.16 100.20 114.23	LP Oil mol % 0.0118 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430 13.9870 9.5090	Flash Oil mol % 0.0079 0.0000 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075 14.2867 9.7229 6.3026 38.3144	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401 4.5197 9.5268 14.8778 10.1469 6.5814 40.0233	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788 0.9385 0.1943 0.0421 0.0000	W&S Gas mol % 0.1818 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213 2.0508 1.0350 0.2179 0.0508 0.0000	Total Emission mol % 0.1821 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906 1.0012 0.2097 0.0478 0.0000
No. 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	H2S O2 C02 N2 C1 C2 C3 i-C4 n-C4 i-C5 C6 C7 C8 C9 C10+	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 72.15 72.15 72.15 86.16 100.20 114.23 128.28	LP Oil mol % 0.0118 0.0000 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430 13.9870 9.5090 6.1620	Flash Oil mol % 0.0079 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075 14.2867 9.7229 6.3026	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401 4.5197 9.5268 14.8778 10.1469 6.5814 40.0233 0.5545	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788 0.9385 0.1943 0.0421 0.0000 0.0894	W&S Gas mol % 0.1818 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213 2.0508 1.0350 0.2179 0.0508 0.0000	Total Emission mol % 0.1821 0.0000 0.0000 1.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906 1.0012 0.2097 0.0478 0.0000 0.0948
No. 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	H2S O2 C02 N2 C1 C2 C3 i-C4 n-C4 i-C5 C6 C7 C8 C9 C10+	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12 72.15 72.15 86.16 100.20 114.23 128.28 252.33	LP Oil mol % 0.0118 0.0000 0.0000 0.0000 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430 13.9870 9.0430 13.9870 9.1620 37.4542	Flash Oil mol % 0.0079 0.0000 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075 14.2867 9.7229 6.3026 38.3144	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401 4.5197 9.5268 14.8778 10.1469 6.5814 40.0233	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788 0.9385 0.1943 0.0421 0.0000	W&S Gas mo1 % 0.1818 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213 2.0508 1.0350 0.2179 0.0508 0.0000 0.0977 0.0566	Total Emission mol % 0.1821 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906 1.0012 0.2097 0.0478 0.0000 0.0948 0.0547
No. 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 C6 C7 C8 C9 C10+ Benzene	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12 72.15 86.16 100.20 114.23 128.28 252.33 78.11	LP Oil mol % 0.0118 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430 13.9870 9.5090 6.1620 37.4542 0.5250	Flash Oil mol % 0.0079 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075 14.2867 9.7229 6.3026 38.3144 0.5350	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000 0.06612 0.5764 3.7185 2.4401 4.5197 9.5268 14.8778 10.1469 6.5814 40.0233 0.5545 1.1728 0.6522	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788 0.9385 0.1943 0.0421 0.0000 0.0894	W&S Gas mol % 0.1818 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213 2.0508 1.0350 0.2179 0.0508 0.0000	Total Emission mol % 0.1821 0.0000 0.0000 1.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906 1.0012 0.2097 0.0478 0.0000 0.0948
No. 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 C6 C7 C8 C9 C10+ Benzene Toluene	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12 72.15 72.15 86.16 100.20 114.23 128.28 252.33 78.11 92.13	LP Oil mol % 0.0118 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430 13.9870 9.5090 6.1620 37.4542 0.5250 1.1010	Flash Oil mol % 0.0079 0.0000 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075 14.2867 9.7229 6.3026 38.3144 0.5350 1.1251	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401 4.5197 9.5268 14.8778 10.1469 6.5814 40.0233 0.5545 1.1728	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788 0.9385 0.1943 0.0421 0.0000 0.0894 0.0511	W&S Gas mo1 % 0.1818 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213 2.0508 1.0350 0.2179 0.0508 0.0000 0.0977 0.0566	Total Emission mol % 0.1821 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906 1.0012 0.2097 0.0478 0.0000 0.0948 0.0547
No. 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 C6 C7 C8 C9 C10+ Benzene Toluene E-Benzene	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12 72.15 72.15 86.16 100.20 114.23 128.28 252.33 78.11 92.13 106.17	LP Oil mol % 0.0118 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430 13.9870 9.5090 6.1620 37.4542 0.5250 1.1010 0.6110	Flash Oil mol % 0.0079 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075 14.2867 9.7229 6.3026 38.3144 0.5350 1.1251 0.6248	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000 0.06612 0.5764 3.7185 2.4401 4.5197 9.5268 14.8778 10.1469 6.5814 40.0233 0.5545 1.1728 0.6522	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788 0.9385 0.1943 0.0421 0.0000 0.0894 0.0511 0.0091	W&S Gas mo1 % 0.1818 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213 2.0508 1.0350 0.2179 0.0508 0.0000 0.0977 0.0566 0.0102	Total Emission mol % 0.1821 0.0000 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906 1.0012 0.2097 0.0478 0.0000 0.0948 0.0547 0.0098
No. 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 C6 C7 C8 C9 C10+ Benzene Toluene E-Benzene Kylenes	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12 72.15 72.15 86.16 100.20 114.23 128.28 252.33 78.11 92.13 106.17 106.17	LP Oil mol % 0.0118 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430 13.9870 9.5090 6.1620 37.4542 0.5250 1.1010 0.6110 1.5540	Flash Oil mol % 0.0079 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075 14.2867 9.7229 6.3026 38.3144 0.5350 1.1251 0.6248 1.5892	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0000 0.06612 0.5764 3.7185 2.4401 4.5197 9.5268 14.8778 10.1469 6.5814 40.0233 0.5545 1.1728 0.6522 1.6591	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788 0.9385 0.1943 0.0421 0.0000 0.0894 0.0511 0.0091 0.0199	W&S Gas mol % 0.1818 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213 2.0508 1.0350 0.2179 0.0508 0.0000 0.0977 0.0566 0.0102 0.0225	Total Emission mol % 0.1821 0.0000 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906 1.0012 0.2097 0.0478 0.0000 0.0948 0.0547 0.0098 0.0216
No. 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 n-C5 C6 C7 C8 C9 C10+ Benzene Toluene E-Benzene Xylenes n-C6 224Trimethylp	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 72.15 72.15 86.16 100.20 114.23 128.28 252.33 78.11 92.13 106.17 106.17 86.18	LP Oil mol % 0.0118 0.0000 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430 13.9870 9.5090 6.1620 37.4542 0.5250 1.1010 0.6110 1.5540 2.7310 0.0000	Flash Oil mol % 0.0079 0.0000 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075 14.2867 9.7229 6.3026 38.3144 0.5350 1.1251 0.6248 1.5892 2.7836 0.0000	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401 4.5197 9.5268 14.8778 10.1469 6.5814 40.0233 0.5545 1.1728 0.6522 1.6591 2.8862 0.0000	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788 0.9385 0.1943 0.0421 0.0000 0.0894 0.0511 0.0091 0.0199 0.4414 0.0000	W&S Gas mol % 0.1818 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213 2.0508 1.0350 0.2179 0.0508 0.0000 0.0977 0.0566 0.0102 0.0225 0.4830 0.0000	Total Emission mol % 0.1821 0.0000 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906 1.0012 0.2097 0.0478 0.0000 0.0948 0.0547 0.0098 0.0216 0.4684 0.0000
No. 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 n-C5 C6 C7 C8 C9 C10+ Benzene Toluene E-Benzene Xylenes n-C6 224Trimethylp	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12 72.15 72.15 86.16 100.20 114.23 128.28 252.33 78.11 92.13 106.17 106.17 86.18 114.24	LP Oil mol % 0.0118 0.0000 0.0000 0.0000 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430 13.9870 9.5090 6.1620 37.4542 0.5250 1.1010 0.6110 1.5540 2.7310 0.0000	Flash Oil mol % 0.0079 0.0000 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075 14.2867 9.7229 6.3026 38.3144 0.5350 1.1251 0.6248 1.5892 2.7836 0.0000	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401 4.5197 9.5268 14.8778 10.1469 6.5814 40.0233 0.5545 1.1728 0.6522 1.6591 2.8862 0.0000	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788 0.9385 0.1943 0.0421 0.0000 0.0894 0.0511 0.0091 0.0199 0.4414 0.0000	W&S Gas mol % 0.1818 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213 2.0508 1.0350 0.2179 0.0508 0.0000 0.0977 0.0566 0.0102 0.0225 0.4830 0.0000	Total Emission mol % 0.1821 0.0000 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906 1.0012 0.2097 0.0478 0.0000 0.0948 0.0547 0.0098 0.0216 0.4684 0.0000
No. 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 n-C5 C6 C7 C8 C9 C10+ Benzene Toluene E-Benzene Xylenes n-C6 224Trimethylp MW Stream Mole Rat	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 58.12 72.15 72.15 86.16 100.20 114.23 128.28 252.33 78.11 92.13 106.17 106.17 86.18 114.24	LP Oil mol % 0.0118 0.0000 0.0000 0.0000 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430 13.9870 9.5090 6.1620 37.4542 0.5250 1.1010 0.6110 1.5540 2.7310 0.0000	Flash Oil mol % 0.0079 0.0000 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075 14.2867 9.7229 6.3026 38.3144 0.5350 1.1251 0.6248 1.5892 2.7836 0.0000	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401 4.5197 9.5268 14.8778 10.1469 6.5814 40.0233 0.5545 1.1728 0.6522 1.6591 2.8862 0.0000	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788 0.9385 0.1943 0.0421 0.0000 0.0894 0.0511 0.0091 0.0199 0.4414 0.0000 38.27 0.0225	W&S Gas mol % 0.1818 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213 2.0508 1.0350 0.2179 0.0508 0.0000 0.0977 0.0566 0.0102 0.0225 0.4830 0.0000	Total Emission mol % 0.1821 0.0000 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906 1.0012 0.2097 0.0478 0.0000 0.0948 0.0547 0.0098 0.0216 0.4684 0.0000
No. 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	H2S O2 CO2 N2 C1 C2 C3 i-C4 n-C4 i-C5 n-C5 C6 C7 C8 C9 C10+ Benzene Toluene E-Benzene Xylenes n-C6 224Trimethylp	MW 34.80 32.00 44.01 28.01 16.04 30.07 44.10 58.12 72.15 72.15 86.16 100.20 114.23 128.28 252.33 78.11 92.13 106.17 106.17 86.18 114.24	LP Oil mol % 0.0118 0.0000 0.0000 0.0000 0.7420 1.2380 3.3880 0.7600 4.3000 2.4410 4.4420 9.0430 13.9870 9.5090 6.1620 37.4542 0.5250 1.1010 0.6110 1.5540 2.7310 0.0000	Flash Oil mol % 0.0079 0.0000 0.0000 0.0000 0.1466 0.7175 2.8445 0.7182 4.1560 2.4447 4.4728 9.2075 14.2867 9.7229 6.3026 38.3144 0.5350 1.1251 0.6248 1.5892 2.7836 0.0000	Sale Oil mol % 0.0001 0.0000 0.0000 0.0000 0.0030 0.6612 0.5764 3.7185 2.4401 4.5197 9.5268 14.8778 10.1469 6.5814 40.0233 0.5545 1.1728 0.6522 1.6591 2.8862 0.0000	Flash Gas mol % 0.1827 0.0000 0.0000 0.0000 26.6676 23.8999 27.0543 2.5785 10.5699 2.2802 3.1022 1.8788 0.9385 0.1943 0.0421 0.0000 0.0894 0.0511 0.0091 0.0199 0.4414 0.0000	W&S Gas mol % 0.1818 0.0000 0.0000 3.4329 16.7365 51.7919 3.8983 13.9661 2.5469 3.4213 2.0508 1.0350 0.2179 0.0508 0.0000 0.0977 0.0566 0.0102 0.0225 0.4830 0.0000	Total Emission mol % 0.1821 0.0000 0.0000 0.0000 11.5592 19.2419 43.1399 3.4367 12.7783 2.4536 3.3097 1.9906 1.0012 0.2097 0.0478 0.0000 0.0948 0.0547 0.0098 0.0216 0.4684 0.0000 43.81 0.0642

2009.01.23





RVP @ 100F [psia] 15.93 11.47 5.90 Spec. Gravity @ 100F 0.645 0.647 0.648

OIL ANALYSES

Nov 21 03 03:42p



LABORATORIES IN ODESSA, GIDDINGS & STACY DAM Billing Address: P.O. BOX 69210 - ODESSA, TEXAS 79769-0210

Stripping Address: 2000 WESTOVER STREET . ODESSA, TEXAS 79764

PHONE (432) 337-8781

NOVEMBER 20, 2003

MS. MARGARET LOWE

BP AMERICA

P.O. BOX 1610

NIDLAND, TEXAS 79702

SAMPLE ID: LAB NO. 1329:

LANZ #37 TANK BATTERY, SAMPLED 11/05/03

26 PSIG @ 93 DEG.F, 76 BBL/DAY

		MOL *
COMPONENT		0.742
METHAME		1.238
ethans		3.388
PROPANE		0.760
ISOBUTANE		4.301
n-Butane		2.441
isopentane		3.663
n - Pentabe		• - •
NEOHEXANE		0.009
CACTOBRATYME		0.780
2-methylpentane		1.716
3 – NETHYLDENTANE		1.347
N-HEXAME		2.731
METHYLCYCLOPENTAME		3.568
Brazene		0.525
CACTOHEXYNE		2.404
2-methylhexane		0.758
3-methylherane		1.818
DIMETRYLCYCLOPENTANES		4.510
n-heptane		2.334
KETHYLCYCLOHEXANE		4.569
TRIMETHYLCYCLOPENTANES		1.071
TOLUENE		1.101
2-METHYLHEPTANE		2.570
3-METHYLHBPTANE		0.701
DINETHYLCYCLOHEXAVES		3.017
N-OCTANE		2.151
ETHYL BENZENE		0.611
M&P-XYLENES		1.277
O-XYLENE		9.277
C9 MAPHTHENES		1.714
C9 PARAFFINS		3.117
N-NONANE		1.332
DECANES PLUS(C10+)		37.459
	TOTAL	100.000

MOLECULAR WEIGHT C10+ 252.33 SPECIFIC GRAVITY C10+ 0.782

PLEASE FEEL FREE TO CONTACT ME AT AMY TIME.

SINCERELY,

STEPHEN OFFI

SR/dt

NOV-21-2003 02:40PM

PAX:9153378781

ID:

PAGE:003 R=95%

APIRT

FEB 1 1 2009

Nov 21 03 03:43p

Mobile Analytical Laboratories, Inc.

LABORATORIES IN COESSA, GIODINGS & STACY DAM Billing Addiess: P.O. BOX 69210 . ODESEA, TEXAS 79769-0210 Shipping Addras: 2000 WESTOVER STREET . ODESSA, TEXAS 70764

PHONE (432) 337-4744 FAX (432) 337-4781

NOVEMBER 20, 2003

MS. MARGARET LOWE BP AMERICA P.O. BOX 1610 MIDLAND, TEXAS 79702

DEAR MS. LOWE:

THE FOLLOWING ARE THE RESULTS OF THE OIL SAMPLES FOR REID VAPOR PRESSURE AND API GRAVITY, SAMPLED 11/05/03, RECEIVED 11/05/03, LAB NOS. 1333-1337:

11/05/03, LAB MOS. 1333-133	RVP	API GRAVITY
LAB NO. 1333: UNIVERSITY WADDELL DEVONIAN TEMP 76°F	₿. 4 #	43.9
LAB NO. 1334: TIPPETT WEST TK BTRY TEMP 84°F	7.9#	38.2
LAB NO. 1335; TK 504 CENTRAL BTRY BLOCK 31 TEMP 72°F	5.4#	43.3
LAB NO. 1336: BENEDUM COMMINGLED CENTRAL TK BTRY TEMP 78°F	4.1#	48.6
LAB NO. 1337: W.H. LANE 37 TK BTRY TEMP 71°F	5.9#	37.9 !

TEST METHOD: RVP ASTM D-323

FAX:9153378781

WE APPRECIATE THE OPPORTUNITY TO WORK WITH YOU ON THESE TESTS. IF YOU HAVE ANY QUESTIONS OR REQUIRE ANY FURTHER INFORMATION, PLEASE FEEL FREE TO CONTACT ME AT ANY TIME.

SINCERELY

STEPHEN REID

SR/md

GAS ANALYSIS

MITCHELL ANALYTICAL LABORATORY

2638 Faudree Odessa, Texas 79765-8538 (432) 561-5579

Gas Analysis

Company:

BP WildFire Production (4)

Producer:

Pioneer Production

Lease:

Schrock 38

Station #:

Meter #10 6/16/2008

Date Run:

Lab Ref #:

08-JUN-44786

Cylinder:

Analyzed by:

David

Sample Pressure: 21

Sample Temp:

Date Sampled:

6/13/2008

Sampled by:

CB

Field Gravity:

Field H2S:

0.0010

Physical Constants per GPA 2145-03 All values calculated @ 60.0 Deg. F.

	14 1. 0/	14.65 psia	14.73 psia	14.65 psia
	Mole %	GPM	GPM	BTU
		(Ideal)	(Ideal)	(Ideal Dry)
Nitrogen	1.659			0.000
CO2	0.415			0.000
H2S	0.001			0.000
Methane	67.949			684.100
Ethane	12.264	3.261	3.270	216.300
Propane	9.537	2.609	2.617	239.300
N-Butane	3.295	1.033	1.035	107.200
Iso-Butane	0.886	0.288	0.289	28.700
N-Pentane	1.076	0.388	0.389	43.000
Iso-Pentane	0.884	0.322	0.323	35.300
Hexanes +	2.033	0.862	0.864	96.400
TOTALS	100.000	8.762	8.786	1450.300

GROSS HEATING VALUE @ 14.65 psia		GASOLINE CONTENT	(GPM/Real)
Dry	Wet		
1458	1444 BTU/Real Cu.Ft.	Ethane and Heavier	8.8091
0.8661	0.8687 Specific Gravity (Real)	Propane and Heavie	5.5308
1450	1426 BTU/Ideal Cu.Ft.	Butane and Heavier	2.9074
0.8618	0.8576 Specific Gravity (Ideal)	Pentane and Heavie	1.5796
Z Factor :	0.9947		

Notes: Adjustment made for Field H2S

PERMIT BY RULE:

106.4 REGULATION TEXT, EFFECTIVE 3-29-01 106.8 REGULATION TEXT, EFFECTIVE 11-1-01 106.352 REGULATION TEXT, EFFECTIVE 9-4-00

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Next Rule>>

TITLE 30 PART 1 ENVIRONMENTAL QUALITY

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

PERMITS BY RULE

SUBCHAPTERA G

GENERAL REQUIREMENTS

RULE §106.4

CHAPTER 106

Requirements for Permitting by Rule

- (a) To qualify for a permit by rule, the following general requirements must be met.
- (1) Total actual emissions authorized under permit by rule from the facility shall not exceed 250 tons per year (tpy) of carbon monoxide (CO) or nitrogen oxides (NO_X); or 25 tpy of volatile organic compounds (VOC) or sulfur dioxide (SO₂) or inhalable particulate matter (PM₁₀); or 25 tpy of any other air contaminant except carbon dioxide, water, nitrogen, methane, ethane, hydrogen, and oxygen.
- (2) Any facility or group of facilities, which constitutes a new major stationary source, as defined in §116.12 of this title (relating to Nonattainment Review Definitions), or any modification which constitutes a major modification, as defined in §116.12 of this title, under the new source review requirements of the Federal Clean Air Act (FCAA), Part D (Nonattainment) as amended by the FCAA Amendments of 1990, and regulations promulgated thereunder, must meet the permitting requirements of Chapter 116, Subchapter B of this title (relating to New Source Review Permits) and cannot qualify for a permit by rule under this chapter. Persons claiming a permit by rule under this chapter should see the requirements of §116.150 of this title (relating to New Major Source or Major Modification in Ozone Nonattainment Areas) to ensure that any applicable netting requirements have been satisfied.
- (3) Any facility or group of facilities, which constitutes a new major stationary source, as defined in 40 Code of Federal Regulations (CFR) §52.21, or any change which constitutes a major modification, as defined in 40 CFR §52.21, under the new source review requirements of the FCAA, Part C (Prevention of Significant Deterioration) as amended by the FCAA Amendments of 1990, and regulations promulgated thereunder, must meet the permitting requirements of Chapter 116, Subchapter B of this title and cannot qualify for a permit by rule under this chapter.
- (4) Unless at least one facility at an account has been subject to public notification and comment as required in Chapter 116, Subchapter B or Subchapter D of this title (relating to New Source Review Permits or Permit Renewals), total actual emissions from all facilities permitted by rule at an account shall not exceed 250 tpy of CO or NO x; or 25 tpy of VOC or SO₂ or PM₁₀; or 25 tpy of any other air contaminant except carbon dioxide, water, nitrogen, methane, ethane, hydrogen, and oxygen.
- (5) Construction or modification of a facility commenced on or after the effective date of a revision of this section or the effective date of a revision to a specific permit by rule in this chapter must meet the revised requirements to qualify for a permit by rule.
- (6) A facility shall comply with all applicable provisions of the FCAA, §111 (Federal New Source Performance Standards) and §112 (Hazardous Air Pollutants), and the new source review requirements of the FCAA, Part C and Part D and regulations promulgated thereunder.
- (7) There are no permits under the same commission account number that contain a condition or conditions precluding the use of a permit by rule under this chapter.
- (8) The proposed facility or group of facilities shall obtain allowances for NO_x if they are subject to Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program).
- (b) No person shall circumvent by artificial limitations the requirements of §116.110 of this title (relating to Applicability).

(c) The emissions from the facility shall comply with all rules and regulations of the commission and with the intent of the TCAA, including protection of health and property of the public, and all emissions control equipment shall be maintained in good condition and operated properly during operation of the facility.

(d) Facilities permitted by rule under this chapter are not exempted from any permits or registrations required by local air pollution control agencies. Any such requirements must be in accordance with TCAA, §382.113 and any other applicable law.

Source Note: The provisions of this §106.4 adopted to be effective November 15, 1996, 21 TexReg 10881; amended to be effective April 7, 1998, 23 TexReg 3502; amended to be effective September 4, 2000, 25 TexReg 8653; amended to be effective March 29, 2001, 26 TexReg 2396

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TITLE 30

ENVIRONMENTAL QUALITY

PART 1

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

CHAPTER 106

PERMITS BY RULE

SUBCHAPTER A

GENERAL REQUIREMENTS

RULE §106.8

Recordkeeping

- (a) Owners or operators of facilities and sources that are de minimis as designated in §116.119 of this title (relating to De Minimis Facilities or Sources) are not subject to this section.
- (b) Owners or operators of facilities operating under a permit by rule (PBR) in Subchapter C of this chapter (relating to Domestic and Comfort Heating and Cooling) or under those PBRs that only name the type of facility and impose no other conditions in the PBR itself do not need to comply with specific recordkeeping requirements of subsection (c) of this section. A list of these PBRs will be available through the commission's Austin central office, regional offices, and the commission's website. Upon request from the commission or any air pollution control program having jurisdiction, claimants must provide information that would demonstrate compliance with §106.4 of this title (relating to Requirements for Permitting by Rule), or the general requirements, if any, in effect at the time of the claim, and the PBR under which the facility is authorized.
- (c) Owners or operators of all other facilities authorized to be constructed and operate under a PBR must retain records as follows:
- (1) maintain a copy of each PBR and the applicable general conditions of §106.4 of this title or the general requirements, if any, in effect at the time of the claim under which the facility is operating. The PBR and general requirements claimed should be the version in effect at the time of construction or installation or changes to an existing facility, whichever is most recent. The PBR holder may elect to comply with a more recent version of the applicable PBR and general requirements;
- (2) maintain records containing sufficient information to demonstrate compliance with the following:
- (A) all applicable general requirements of §106.4 of this title or the general requirements, if any, in effect at the time of the claim; and
- (B) all applicable PBR conditions;
- (3) keep all required records at the facility site. If however, the facility normally operates unattended, records must be maintained at an office within Texas having day-to-day operational control of the plant site;
- (4) make the records available in a reviewable format at the request of personnel from the commission or any air pollution control program having jurisdiction;
- (5) beginning April 1, 2002, keep records to support a compliance demonstration for any consecutive 12-month period. Unless specifically required by a PBR, records regarding the quantity of air contaminants emitted by a facility to demonstrate compliance with §106.4 of this title prior to April 1, 2002 are not required under this section; and
- (6) for facilities located at sites designated as major in accordance with §122.10(13) of this title (relating to General Definitions) or subject to or potentially subject to any applicable federal requirement, retain all records demonstrating compliance for at least five years. For facilities located at all other sites, all records demonstrating compliance must be retained for at least two years. These record retention requirements supercede any retention conditions of an individual PBR.

Source Note: The provisions of this §106.8 adopted to be effective November 1, 2001, 26 TexReg 8518

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TITLE 30

ENVIRONMENTAL QUALITY

PART 1

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

CHAPTER 106

PERMITS BY RULE

SUBCHAPTER O

OIL AND GAS

RULE §106.352

Oil and Gas Production Facilities

Any oil or gas production facility, carbon dioxide separation facility, or oil or gas pipeline facility consisting of one or more tanks, separators, dehydration units, free water knockouts, gunbarrels, heater treaters, natural gas liquids recovery units, or gas sweetening and other gas conditioning facilities, including sulfur recovery units at facilities conditioning produced gas containing less than two long tons per day of sulfur compounds as sulfur are permitted by rule, provided that the following conditions of this section are met. This section applies only to those facilities named which handle gases and liquids associated with the production, conditioning, processing, and pipeline transfer of fluids found in geologic formations beneath the earth's surface.

- (1) Compressors and flares shall meet the requirements of §106.512 and §106.492 of this title (relating to Stationary Engines and Turbines, and Flares).
- (2) Total emissions, including process fugitives, combustion unit stacks, separator, or other process vents, tank vents, and loading emissions from all such facilities constructed at a site under this section shall not exceed 25 tons per year (tpy) each of sulfur dioxide (SO₂), all other sulfur compounds combined, or all volatile organic compounds (VOC) combined; and 250 tpy each of nitrogen oxide and carbon monoxide. Emissions of VOC and sulfur compounds other than SO₂ must include gas lost by equilibrium flash as well as gas lost by conventional evaporation.
- (3) Any facility handling sour gas shall be located at least 1/4 mile from any recreational area or residence or other structure not occupied or used solely by the owner or operator of the facility or the owner of the property upon which the facility is located.
- (4) Total emissions of sulfur compounds, excluding sulfur oxides, from all vents shall not exceed 4.0 pounds per hour (lb/hr) and the height of each vent emitting sulfur compounds shall meet the following requirements, except in no case shall the height be less than 20 feet:

Attached Graphic

(5) Before operation begins, facilities handling sour gas shall be registered with the commission's Office of Permitting, Remediation, and Registration in Austin using Form PI-7 along with supporting documentation that all requirements of this section will be met. For facilities constructed under §106.353 of this title (relating to Temporary Oil and Gas Facilities), the registration is required before operation under this section can begin. If the facilities cannot meet this section, a permit under Chapter 116 of this title (relating to Control of Air Pollution by Permits for New Construction or Modification) is required prior to continuing operation of the facilities.

Source Note: The provisions of this §106.352 adopted to be effective March 14, 1997, 22 TexReg 2439; amended to be effective September 4, 2000, 25 TexReg 8653

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39	YAC	106.352(4)	Figure
()		

Pagrof 1

Figure: 30 TAC 106.352(4)

Total as <u>Hydrogen Sulfide, lb/hr</u>	Minimum vent height, feet
0.27	20
0.60	30
1.94	50
3.00	60
4.00	68

NOTE: Other values may be interpolated.

