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: _____
RENEWAL:
PROJECT ADMIN NAME: SHCROCK WM NO 38 INCREASED THROUGHPUT
PROJECT TECH NAME: SHCROCK WM NO 38 BATTERY

Schrock → Asked APERT to fix 2/18 11:12 AM
Fixed @ 11:31 by R Suniga

STAFF ASSIGNED TO PROJECT:

SUNIGA , RICHARD	- REVIEWR1_2 -	AP INITIAL REVIEW
WURST , DONNA	- REVIEW ENG -	RR TEAM

✓ APD CERT
VOC < 100 tpy

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 LEFT & CONT 3.7 MI TURN W INTO CATTLEGUARD D & ON 0.4 MI & S 0.1 MI
REGION 07 - MIDLAND NEAR CITY: MIDKIFF COUNTY: GLASSCOCK

V 24.50
N 0.21
C 0.18
P_{10} 0.02
S 0.05
F < 0.01
H_2S 0.03
TSS 6.22 < 0.01
VOC H_2S

CONTACT DATA

CONTACT NAME: MR SCOTT CARRELL CONTACT ROLE: RESPONSIBLE OFFICIAL
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

TRV 374618
X1-375187

PROJECT NOTES:
02/12/2009 RESUBMITTAL VOIDED PROJECT 139966 FEE TRANSFERRED
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		
PROJECT RECEIVED BY ENGINEER (DATE)		

Unit type ✓

PROJECT RULES:

Rule Desc	Request Type	On Application	Approve
106.352 OIL AND GAS PRODUCTION FACILITIES -	ADD	Y	APPROVE

PERMIT RULES:

Rule Desc	Start Date	End Date
106.352	06/22/2004	

RECEIVED
MAR 18 2009
TCEQ
CENTRAL FILE 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 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

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
New or Existing Site:	Existing
Affected Permit (if applicable):	None
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,

Anne M. Inman, P.E., Manager
Rule Registrations Section
Air Permits Division

cc: Air Section Manager, Region 7 - Midland

Project Number: 144380

Emissions

Registered			*Certified*	*MSS**	*HAPs**
VOCs	24.50	tpy	*13.77 tpy Oil Tank Vent*	*6.22 tpy (VOC)*	*<0.01 tpy (HCHO)*
SO_2	0.05	tpy		<0.01 tpy (H_2S)	0.03 tpy (H_2S)
CO	0.18	tpy			
NO_x	0.21	tpy			
PM_{10}	0.02	tpy			
** MSS, HAPs and Certified emissions are included in VOC total*					

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

GENERAL INFORMATION			
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?		X	
Are there affected NSR or Title V permits for the project?		X	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?		X	
Are PBR sitewide emissions > 25/250 tpy?		X	
Are there permit limits on using PBRs at the site?		X	
Is PSD or Nonattainment netting required? *116.111(a)(2)(I) - Prevention of Significant Deterioration (PSD) Review* *116.111(a)(2)(H) - Non-attainment Review*		X	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. This site is located in an attainment county (Glasscock County). NOx and 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?		X	None represented
Does NOx Cap and Trade apply to this registration?		X	Site is not in the Houston/Galveston/Brazoria nonattainment area.
Is the facility in compliance with all other applicable rules and regulations?	X		

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 INFORMATION			
Natural Gas Throughput (MMSCF/day):	0.290	**H_2S 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/PROCESSES AT SITE						
Number of each:	**Compressor Engines:**	--	**Glycol dehydrators:**	--	**VRU:**	1
	Separators:	1	**Amine units:**	--	**Freewater Knock Out:**	1
	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 bbl	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%

***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

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.

E&P TANKS - LOW OR HIGH PRESSURE OIL [FOR ESTIMATING WORKING, BREATHING, AND FLASH LOSSES FROM STORAGE TANKS]				
Known Separator Stream:	Low Pressure Oil	**Laboratory Analyses submitted (if yes, include date):**	**Low Pressure Liquid Sample**	YES, 11/20/2008
Calculation Method:	AP-42		**High Pressure Liquid Sample**	n/a
Analyses from Actual site or Representative Site?	Representative (Lane #37 Tank Battery)			
If not from actual, explain why representative:	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.			

Tank Identifier (EPN)	Separator Pressure (psig)	Separator Temperature (°F)	Ambient Pressure (psia)	Ambient Temperature (°F)	C10+ MW	C10+ SG	Production Rate (bbl/day)	API Gravity (°API)	RVP (psia)	Emissions Uncontrolled VOC, C3+ (ton/yr)
Oil Tanks	26.00	93.00	13.282	63.30	252.33	0.7820	200	37.9	5.90	160.187*

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

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

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.

FUGITIVES [EMISSIONS CALCULATED USING EMISSION FACTORS FROM EPA DOCUMENT 4531, R-95-017, Table 2-4]

	Valves	Flanges	Connectors	Relief Valve	Pump	Other	VOC content of stream (weight %)	Total Annual Emissions (tpy)
Gas Service Component Count	10	5	151	3		7	39.15 wt% VOC (0.0161 wt% H2S)	0.6241 VOC 0.00026 H2S
Liquid Service Component Count	66	5	300		1	3	100 wt% VOC (0.0118 wt% H2S)	2.5460 VOC 0.0003 H2S

If VOC content of gas stream <100%, was inlet or other laboratory gas analysis included?	YES	**Date of Sample:**	6/13/08	**VOC content from lab analysis (wt %):**	39.15 wt%	**H_2S content from lab analysis (wt %):**	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 = 5,280 feet.
(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_2S (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.

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

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

COMMUNICATION LOG

Date	Time	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 applicant would be attending the "TCEQ - Emissions Inventory Workshop" on 2/10/09.
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 applicant 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 added that reviewer's work leader, Mr. Monico Banda, would also be present. Reviewer stated, since Mr. Banda is oil and gas expert and reviewer is still somewhat new to oil and gas projects, reviewer wanted Mr. Banda present during meeting to ensure that Air Permits provided best customer service.
2/11/09	8:00 AM	Mr. Scott Carrell Air Quality Specialist Mr. Monico Banda Work Leader and Oil & Gas Expert	Reviewer and Mr. Banda met with applicant to discuss project (i.e. deficiencies from last project and revised application). Applicant went over entire process, calculations, etc. Applicant stated that APD-CERT would be sent from company's Midland, TX location by Friday, February 13, 2009. After meeting, reviewer took application to APIRT to create new project number.
Reviewer performed initial review during meeting with applicant and work leader on 2/11/09, but reviewer put initial review date as 2/13/09 since that was date that reviewer actually received file from APIRT. Reviewer was not in the office on 2/13/09 or 2/16/09.			
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 reviewer. Applicant added, per previous discussion, APD-CERT would be mailed in from company's Midland, TX location, and would be sent to ensure tank 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 electronically since would expedite PBR review by reviewer being able to copy/paste from 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 applicant's documentation into technical review, thereby expediting review.
2/18/09	11:12 AM 11:31 AM	Mr. Richard Suniga / APIRT	11:12 AM - Reviewer asked that Mr. Suniga correct name from 'Shcrock' to 'Schrock' in IMS. 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. Callihan, BP Permian Operations Center Manager, had just signed the form to make tank emissions federally enforceable. Applicant added that hard copy with original signature would be mailed tomorrow.
2/26/09	11:46 AM	Mr. Scott Carrell Air Quality Specialist	Reviewer left voice mail message for applicant asking why sample taken from representative site (Lane #37 Tank Battery) instead of Schrock WM No. 38 site 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 representative site (Lane #37 Tank Battery) instead of Schrock WM No. 38 site and where 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 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 into.
2/27/09	9:00 AM	Mr. Scott Carrell Air Quality Specialist Ms. Dana Johnson / Permit Reviewer	Ms. Johnson contacted applicant along with reviewer to ask about certification at site. It was decided that it was alright to only certify VOC emissions (using APD-CERT) from oil tank vent since all other VOC emission sources are at maximum capacity. Applicant indicated applicant had received guidance from Ms. Anne Inman concerning this.

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

2/27/09	9:39 AM	Mr. Scott Carrell Air Quality Specialist *Copies to:* *Ms. Dana Johnson / Permit Reviewer* *Mr. Alton G. Callihan, Permian Operations Center Manager*	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. 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	H2S		VOC		NOx		CO		PM_{10}		SO_2		HCHO	
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
Heater Treater (0.5 MMBtu/hr)			0.0027	0.0118	0.0490	0.2147	0.0412	0.1804	0.0037	0.0163	0.0109	0.0478	0.00004	0.0002
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										
TOTAL EMISSIONS (TPY):		**0.03**		**24.50**		**0.21**		**0.18**		**0.02**		**0.05**		**<0.01**
MAXIMUM OPERATING SCHEDULE:			**Hours/Day**		24	**Days/Week**		7	**Weeks/Year**		52	**Hours/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?	X		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 Wurst	Jennifer Pfeil	Steelhard 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:	

02/27/2009 ----------NSR IMS - PROJECT RECORD ----------

PROJECT#: 144380 PERMIT#: 72355 STATUS: PENDING DISP CODE: C
RECEIVED: 02/11/2009 PROJTYPE: REVISION AUTHTYPE: PBR ISSUED DT: 2/27/09
RENEWAL:
PROJECT ADMIN NAME: SCHROCK WM NO 38
PROJECT TECH NAME: SCHROCK WM NO. 38 INCREASED THROUGHPUT
STAFF ASSIGNED TO PROJECT:
SUNIGA , RICHARD - REVIEWR1_2 - AP INITIAL REVIEW
WURST , DONNA - REVIEW ENG - RR TEAM

4.75
Jenfer

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 LEFT & CONT 3.7 MI TURN W INTO 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: RESPONSIBLE OFFICIAL
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:
02/12/2009 RESUBMITTAL VOIDED PROJECT 139966 FEE TRANSFERRED
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	
ENGINEER INITIAL REVIEW COMPLETED (DATE)	02/13/2009	
PROJECT RECEIVED BY ENGINEER (DATE)	02/13/2009	
PEER / MANAGER REVIEW PERIOD	02/27/2009	02/27/2009

UNIT TYPES:
Project Unit Type:

Industry Group	Industry Type	Source Type	Control/BACT Type	Request	Authorization
CHEMICAL	OIL AND GAS				

PROJECT RULES:

Rule Desc	Request Type	On Application	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
MSS- 101.222(H)(1)	(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

Dana Johnson

02/26/2009 ----------NSR IMS - PROJECT RECORD ----------

PROJECT#: 144380 PERMIT#: 72355 STATUS: PENDING DISP CODE: _____
RECEIVED: 02/11/2009 PROJTYPE: REVISION AUTHTYPE: PBR ISSUED DT: _____
RENEWAL:
PROJECT ADMIN NAME: SCHROCK WM NO 38
PROJECT TECH NAME: SCHROCK WM NO. 38 INCREASED THROUGHPUT

STAFF ASSIGNED TO PROJECT:

SUNIGA , RICHARD	- REVIEWR1_2 -	AP INITIAL REVIEW
WURST , DONNA	- REVIEW ENG -	RR TEAM

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 LEFT & CONT 3.7 MI TURN W INTO 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: RESPONSIBLE OFFICIAL
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:
02/12/2009 RESUBMITTAL VOIDED PROJECT 139966 FEE TRANSFERRED
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	
ENGINEER INITIAL REVIEW COMPLETED (DATE)	02/13/2009	
PROJECT RECEIVED BY ENGINEER (DATE)	02/13/2009	
DEFICIENCY CYCLE		
PEER / MANAGER REVIEW PERIOD		

UNIT TYPES:
Project Unit Type:

PROJECT RULES:

Rule Desc	Request Type	On Application	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

APIRT
FEB 25 2009

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

AIR PERMITS DIVISION
FEB 25 2009
RECEIVED

CERTIFIED MAIL 7006 0100 0005 8603 2671

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)

I. Company and Site Information

A. Company Name:	**BP America Production Company**						
B. Responsible Official Name:	**Alton G Callihan**			Responsible Official's Title:	**Permian OC Manager**		
Mailing Address:	**600 N Marienfeld Ste 800**						
City:	**Midland**	County:	**Midland**	State:	**TX**	Zip Code:	**79701**
Telephone No.:	**432-688-5535**	Fax No.:	**432-688-5246**	E-mail Address:	alton.callihan@bp.com		
C. Site Name:	**Schrock WM No. 38**						
Street Address: *(if different from above)*							
If "NO," street address describe physical location with driving directions: **From Hwy 158 at FM 1379, go S 11 mi to FM 1357, turn left & cont. 3.7 mi, turn W into cattleguard "D" & on 0.4 mi, & S 0.1 mi**							
City or nearest city:	**Midkiff**			County:	**Glasscock**	Zip Code:	**79755**
D. TCEQ Account Identification Number *(leave blank if unknown)*:							
E. TCEQ Customer Reference Number *(leave blank if unknown)*:	**CN600129373**						
TCEQ Regulated Entity Number *(leave blank if unknown)*:	**RN104299359**						
F. Does the site have a Title V Permit?						YES:	NO: X
G. Title V Permit Number:							
H. Is this a small business?						YES:	NO: X

II. Attach the Following Documentations

A. Copies of a previously completed Form PI-7 or Form PI-1S and all supporting documentation.	X
B. A list of each source of air emissions at the site.	X
C. A summary of the certified emission rates.	X
D. A process description.	X

III. Maintain Records On Site to Demonstrate Continuing Compliance and Make the Records Available on Request

IV. Purpose of this Certification *(choose and complete all that are appropriate)*

This certification is intended to establish emission rates below state and federal rule thresholds and triggers for:

X 30 TAC § 106.4 for Permits by Rule	X Permit by Rule Number: 352
___ HR VOC Emissions Cap and Trade Program	___ Emissions Banking and Trading Program (other than HRVOC)
___ 30 TAC § 115 for Volatile Organic Compounds	___ 30 TAC § 117 for Nitrogen Oxides
___ 40 CFR Part 60, Subpart _____	___ 40 CFR Part 61, Subpart _____
___ 40 CFR Part 63, Subpart _____	___ Title V Permit Major Source Applicability
___ Standard Permit: _____	___ Other: _____

V. Requests Associated with this Certification

A. Are you requesting to withdraw your Title V operating permit application? *If "YES," submit the original of this certification directly to the assigned Title V permit reviewer and send a copy to the locations indicated in the Mailing Instruction below.*	YES:	X	NO:
B. Are you requesting to void an issued Title V operating permit or authorization to operate under a general operating permit? *If "YES," submit this certification to the locations indicated in the Mailing Instructions below.*	YES:	X	NO:
C. For issued Title V permits, are you subject to Title V permitting requirements, but are submitting this certification to demonstrate that you are not subject to MACT requirements? *If "YES," submit this certification to the locations indicated in the Mailing Instructions below.*	YES:	X	NO:
D. For pending Title V permits, are you subject to Title V permitting requirements, but are submitting this certification to demonstrate that you are not subject to MACT requirements? *If "YES," submit the **original** of this certification directly to the assigned Title V permit reviewer and send a copy to the locations indicated in the Mailing Instructions below.*	YES:	X	NO:
E. Are you establishing maximum allowable emission rates for HRVOC emissions? *If yes, submit **originals** of the Form ECT-3H and this certification directly c o Cory Chism, Team Leader, Emissions Banking and Trading Team, Air Permits Division, MC163 and send a copy to the locations indicated in the Mailing Instructions below.*	YES:	X	NO:

VI. Certification by Responsible Official

All representations in this certification of emissions are conditions upon which the stationary source shall operate. This certification reflects the maximum emission rates for the operation of this facility. The facility will operate in compliance with all regulations of the Texas Commission on Environmental Quality and with federal U.S. Environmental Protection Agency regulations governing air pollution. It shall be unlawful for any person to vary from such representation unless the certification is first revised. The signature below indicates that, based on information and belief formed after reasonable inquiry, the statements and information contained in the attached documents are true, accurate, and complete.

NAME and TITLE: **Alton G Callihan, Permian Operations Center Manager**

SIGNATURE: Alton Callihan *ORIGINAL SIGNATURE REQUIRED* **DATE:** 2/18/09

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)

Emission Rate Data									
FIN	Facility Name	EPN	Point Name	Authorization Type	Authorization Date	Permit or Registration Number (if applicable)	Air Contaminant Name	Maximum Certified Emission Rates	
								Pounds/ Hour	Tons/ Year
SCHRTK01	Oil Tank	SCHRTK01	Oil Tank Vent	PBR 106.352	2/16/2009	72355	VOC	N/A	13.77

Emissions Totals: (tons/year)	VOC = 13.77	NOx =	CO =	PM =	SO2 =	Other =

Attach additional pages if needed

From: "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 - Schrock WM No. 38 site

From: 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

Donna Wurst - RE: BP Schrock WM No. 38 Registration

From: "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
Fax: (281) 366-7945
Scott.Carrell@bp.com

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

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

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

I. Company and Site Information							
A. Company Name:	BP America Production Company						
B. Responsible Official Name:	Alton G Callihan			Responsible Official's Title:		Permian OC Manager	
Mailing Address:	600 N Marienfeld Ste 800						
City:	Midland	County:	Midland	State:	TX	Zip Code:	79701
Telephone No.:	432-688-5535	Fax No.:	432-688-5246	E-mail Address:	alton.callihan@bp.com		
C. Site Name:	Schrock WM No. 38						
Street Address: *(if different from above)*							
If "NO," street address describe physical location with driving directions:							
From Hwy 158 at FM 1379, go S 11 mi to FM 1357, turn left & cont. 3.7 mi, turn W into cattleguard "D" & on 0.4 mi, & S 0.1 mi							
City or nearest city:	Midkiff			County:	Glasscock	Zip Code:	79755
D. TCEQ Account Identification Number *(leave blank if unknown)*:							
E. TCEQ Customer Reference Number *(leave blank if unknown)*:	CN600129373						
TCEQ Regulated Entity Number *(leave blank if 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 completed Form PI-7 or Form PI-1S and all supporting documentation.	X
B. A list of each source of air emissions at the site.	X
C. A summary of the certified emission rates.	X
D. A process description.	X

III. Maintain Records On Site to Demonstrate Continuing Compliance and Make the Records Available on Request

IV. Purpose of this Certification *(choose and complete all that are appropriate)*

This certification is intended to establish emission rates below state and federal rule thresholds and triggers for:

X 30 TAC § 106.4 for Permits by Rule	X Permit by Rule Number: 352
___ HR VOC Emissions Cap and Trade Program	___ Emissions Banking and Trading Program (other than HRVOC)
___ 30 TAC § 115 for Volatile Organic Compounds	___ 30 TAC § 117 for Nitrogen Oxides
___ 40 CFR Part 60, Subpart _____	___ 40 CFR Part 61, Subpart _____
___ 40 CFR Part 63, Subpart _____	___ Title V Permit Major Source Applicability
___ Standard Permit: _____	___ Other: _____

V. Requests Associated with this Certification

A. Are you requesting to withdraw your Title V operating permit application? *If "YES," submit the original of this certification directly to the assigned Title V permit reviewer and send a copy to the locations indicated in the Mailing Instruction below.*		YES	X	NO
B. Are you requesting to void an issued Title V operating permit or authorization to operate under a general operating permit? *If "YES," submit this certification to the locations indicated in the Mailing Instructions below.*		YES	X	NO
C. For issued Title V permits, are you subject to Title V permitting requirements, but are submitting this certification to demonstrate that you are not subject to MACT requirements? *If "YES," submit this certification to the locations indicated in the Mailing Instructions below.*		YES	X	NO
D. For pending Title V permits, are you subject to Title V permitting requirements, but are submitting this certification to demonstrate that you are not subject to MACT requirements? *If "YES," submit the **original** of this certification directly to the assigned Title V permit reviewer and send a copy to the locations indicated in the Mailing Instructions below.*		YES	X	NO
E. Are you establishing maximum allowable emission rates for HRVOC emissions? *If yes, submit **originals** of the Form ECT-3H and this certification directly c/o Cory Chism, Team Leader, Emissions Banking and Trading Team, Air Permits Division, MC163 and send a copy to the locations indicated in the Mailing Instructions below.*		YES	X	NO

VI. Certification by Responsible Official

All representations in this certification of emissions are conditions upon which the stationary source shall operate. This certification reflects the maximum emission rates for the operation of this facility. The facility will operate in compliance with all regulations of the Texas Commission on Environmental Quality and with federal U.S. Environmental Protection Agency regulations governing air pollution. It shall be unlawful for any person to vary from such representation unless the certification is first revised. The signature below indicates that, based on information and belief formed after reasonable inquiry, the statements and information contained in the attached documents are true, accurate, and complete.

NAME and TITLE: Alton G Callihan, Permian Operations Center Manager

SIGNATURE: Alton Callihan *ORIGINAL SIGNATURE REQUIRED* **DATE:** 2/18/09

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)

Emission Rate Data									
FIN	Facility Name	EPN	Point Name	Authorization Type	Authorization Date	Permit or Registration Number (if applicable)	Air Contaminant Name	Maximum Certified Emission Rates	
								Pounds/ Hour	Tons/ Year
SCHRTK01	Oil Tank	SCHRTK01	Oil Tank Vent	PBR 106.352	2/16/2009	72355	VOC	N/A	13.77

Emissions Totals: (tons/year)	VOC = 13.77	NOx =	CO =	PM =	SO2 =	Other =

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

Donna Wurst - BP Schrock WM No. 38 Registration

From: "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

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

Donna M. Wurst
Texas Commission on Environmental Quality
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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

---

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

R&R Screening for New Projects

Company BP — *Permit #* 72355 — *Project #* 144380

> 1 wk from Rec'd? ☐Yes ☑No

☑ *Project Type* ☐ New ☑ Revise ☐ Renew ☑ PBR ☐ StdP ☐ GOP

Reply to Void? ☑Yes ☐No — Other Air NSR @ RN? ☐Yes ☑No ☐ Unknown

RN 104299359 — List #s/Prev Reviewer:

☐ Rush/Reason :

PBR/SP/GOP # 352 — *Industry Type / Project's Purpose* O&G

Site Rvw Req'd? ☐Yes ☑No — *County* Glasscock — *Toxics Project* ☐Yes ☑No

RFC SR Sent ☐Yes ☑No — *NA Area?* ☐Yes ☑No — *Email sent* ☐Yes ☑No

Supporting Info As Provided

Correct Appl Form? ☑Yes ☐No
CERT or PI-1S Signed? ☐Yes ☐No ☑N/A
Fee? ☐Yes ☑No ☐ N/A
Project Description? ☑Yes ☐No
Checklists/Rule info? ☑Yes ☐No ☐ N/A
Emissions Info? ☑Yes ☐No ☐ N/A

Site PSD Major? ☐Yes ☐No ☑Unknown
Site NA Major? ☐Yes ☐No ☑Unknown
Netting Provided? ☐Yes ☑No ☐ N/A
Site FOP Major? ☐Yes ☐No ☐Unknown
NSPS, MACT Discussed? ☑Yes ☐No ☐ N/A
Ch 115, 117 Discussed? ☑Yes ☐No ☐ N/A

Issues / Info

ID'd by Screening

Reviewer Assign:

Rating ☐ Simple ☑ Moderate ☐ Complex ☐ Other:

Recommend? ☐ Intern ☐ Trainee ☑ MidRvwr ☐Sr/WLdr ☐ TechSp ☐ Other:

Date Screened 2/13 — *Rvwr Initials* AWL

Project Coord:

Assigned to DONNA — *Date Transfer* 2-13 — *UNITTYPE ENTERED* V CS

Actions by Reviewer *actions taken based on notes above*

Initial Review Date

Draft TRV GW Doc No.

02/16/2009 ----------NSR IMS - PROJECT RECORD ----------

PROJECT#: 144380 PERMIT#: 72355 STATUS: PENDING DISP CODE: _____
RECEIVED: 02/11/2009 PROJTYPE: REVISION AUTHTYPE: PBR ISSUED DT: _____
RENEWAL:
PROJECT ADMIN NAME: SHCROCK WM NO 38 INCREASED THROUGHPUT
PROJECT TECH NAME: SHCROCK WM NO 38 BATTERY

STAFF ASSIGNED TO PROJECT:

SUNIGA , RICHARD - REVIEWR1_2 - AP INITIAL REVIEW
WURST , DONNA - REVIEW ENG - RR TEAM

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 LEFT & CONT 3.7 MI TURN W INTO 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: RESPONSIBLE OFFICIAL
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:

02/12/2009 RESUBMITTAL VOIDED PROJECT 139966 FEE TRANSFERRED

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	
PROJECT RECEIVED BY ENGINEER (DATE)	02/13/2009	
DEFICIENCY CYCLE		
ENGINEER INITIAL REVIEW COMPLETED (DATE)		
PEER / MANAGER REVIEW PERIOD		

UNIT TYPES:

Project Unit Type:

PROJECT RULES:

Rule Desc	Request Type	On Application	Approve
106.352 OIL AND GAS PRODUCTION FACILITIES -	ADD	Y	APPROVE

PERMIT RULES:

Rule Desc	Start Date	End Date
106.352	06/22/2004	

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

From: Donna Wurst
To: Carrell, Scott
Date: 2/17/2009 10:50 AM
Subject: RE: TCEQ revised form 10228 PI-7

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Donna M. Wurst
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OPR / Rule Registrations Section
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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

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

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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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

I. REGISTRANT INFORMATION					
A. TCEQ Customer Reference Number:	CN600129373	TCEQ Regulated Entity Number:	RN 104299359		
Note: If no CN or RN number was entered above, please fill out the required Core Data Form, which will be available in Step II of the submittal process.					
B. Company or Other Legal Customer Name:	BP America Production Company				
Company Official Contact Name:	Scott Carrell	Title:	Air Quality Specialist		
Mailing Address:	P.O. Box 3092				
City:	Houston	State:	TX	Zip Code:	77253-3092
Phone:	(281) 366-8431	Fax:	(281) 366-7945	E-mail:	scott.carrell@bp.com
C. Technical Contact Name:	Scott Carrell	Title:	Air Quality Specialist		
Company:	BP America Production Company				
Mailing Address:	P.O. Box 3092				
City:	Houston	State:	TX	Zip Code:	77253-3092
Phone:	(281) 366-8431	Fax:	(281) 366-7945	E-mail:	scott.carrell@bp.com
D. Facility Location Information - Street Address:					
If no street address, provide written driving directions to the site: *(attach description if additional space is needed)*					
From Hwy 158 at FM 1379, go S 11 mi to FM 1357, turn left & cont. 3.7 mi, turn W into cattleguard "D" & on 0.4 mi, & S 0.1 mi					
City:	Midkiff	County:	Glasscock	Zip Code:	79755

II. FACILITY AND SITE INFORMATION							
A. Name and Type of Facility:	Schrock Wm No. 38 Increased Throughput	X	Permanent		Portable		
B. PBR claimed under 30 TAC § 106 *(List all that apply in hard copy, or choose all that apply from the drop down menus in electronic version):*							
§106. 352 (9/4/00)		§106.					
§106.		§106.					
Are you claiming historical standard exemption or PBR?		YES	X	NO	If "YES" enter effective date and Rule No.:		
C. Is there a previous Standard Exemption or PBR for the facility in this registration? (Attach details regarding changes)						YES X	NO
If "YES," enter Registration Number and Rule Number:	72355				106.352 (9/4/00)		
D. Are there any other facilities at this site which are authorized by an Air Standard Exemption or PBR?					X	YES	NO
If "YES," enter Registration Number and Rule Number:	106.352 (9/4/00)						
E. Are there any other air preconstruction permits at this site?	X	YES		NO	If "YES," enter Permit Nos.:		72355
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.:		
F. Is this facility located at a site required to obtain a federal operating permit pursuant to 30 TAC Chapter 122?					YES	X NO	To Be Determined
If the site currently has an existing federal operating permit, enter the permit number:					Permit No.:		
Identify the requirements of 30 TAC Chapter 122 that will be triggered if this claim is accepted: (check all that apply)							
	Initial Application for an FOP		Significant Revision for SOP		Minor Revision for SOP		
	Operational Flexibility/Off Permit Notification for an SOP		Revision for GOP		To Be Determined	X	None
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 application/revision application (submitted or under APD review)			X	N/A		
G. TCEQ Account Identification Number *(if known)*:							

III. FEE INFORMATION					
To determine if a fee is required answer the following questions. If "YES," to question III. A., a fee is not required, skip to Section IV. If "NO" to answer III. A., then go to Section III. B. See Section VI for address to send fee or go to www2.tceq.state.tx.us/epay *to pay online*					
A. Is this registration an update to a previously registered 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 "YES," 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
Is this registration submitted by a governmental entity with a population of less than 10,000?				YES X	NO
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:	$450		

IV. 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 Handling, Storage and Drying §106.283 **Auto Body Refinishing Facilities** §106.436 **Air Curtain Incinerator** §106.426			
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")		YES	NO
B. Distance from this facility's emission release point to the nearest property line:	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				
Registrants must be in compliance with all applicable state and federal regulations and standards to claim a PBR .				
A. Is Confidential information submitted and properly marked "CONFIDENTIAL" with this registration?		YES	X	NO
B. Is a process flow diagram or a process description attached?	X	YES		NO
C. Are emissions data and calculations for this claim 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)*	X	YES		NO
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/operator of these facilities must possess NO $_x$ allowances equivalent to the actual NO $_x$ emissions from these facilities.				
E. Is information attached showing how the specific PBR requirements are met for this registration? *(PBR checklists may be used, but are optional)*	X	YES		NO
F. Distance from this facility's emission release point to the nearest property line:		2534		feet
Distance from this facility's emission release point to the nearest off-property structure:		5280		feet
Note: In limited cases, a map or drawing of the site and surrounding land use may be requested during the technical review or at the request of the TCEQ Regional Office or local air pollution control program during an investigation.				

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 payment		
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 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 - 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 electronically. 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 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building F, First Floor, Room 1206, Austin, Texas 78753 Facsimile (512) 239-2123 (*do not follow fax with paper copies*)	Originals - Form PI-7, Core Data Form; all attachments
2. 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 - RE: Schrock WM No. 38 Battery (increase in throughput)

From: 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

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
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To: "Donna Wurst" <DWurst@tceq.state.tx.us>
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Schrock WM No. 38 Battery
RN104299359
CN600129373
PBR Registration # 72355

Thanks,
Scott Carrell

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From: Donna Wurst
To: Carrell, Scott
Date: 2/5/2009 9:38 AM
Subject: RE: Schrock WM No. 38 Battery (increase in throughput)
CC: Banda, Monico; Wentworth, Molly

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

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

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

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

From: "Carrell, Scott" <Scott.Carrell@bp.com>
To: "Donna Wurst" <DWurst@tceq.state.tx.us>
Date: 2/5/2009 7:55 AM
Subject: RE: Schrock WM No. 38 Battery (increase in throughput)

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

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

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

I. REGISTRANT INFORMATION					
A. TCEQ Customer Reference Number:	CN600129373	TCEQ Regulated Entity Number:	RN 104299359		
Note: If no CN or RN number was entered above, please fill out the required Core Data Form, which will be available in Step II of the submittal process.					
B. Company or Other Legal Customer Name:	BP America Production Company				
Company Official Contact Name:	Scott Carrell	Title:	Air Quality Specialist		
Mailing Address:	P.O. Box 3092				
City:	Houston	State:	TX	Zip Code:	77253-3092
Phone:	(281) 366-8431	Fax:	(281) 366-7945	E-mail:	scott.carrell@bp.com
C. Technical Contact Name:	Scott Carrell	Title:	Air Quality Specialist		
Company:	BP America Production Company				
Mailing Address:	P.O. Box 3092				
City:	Houston	State:	TX	Zip Code:	77253-3092
Phone:	(281) 366-8431	Fax:	(281) 366-7945	E-mail:	scott.carrell@bp.com
D. Facility Location Information - Street Address:					
If no street address, provide written driving directions to the site: *(attach description if additional space is needed)*					
From Hwy 158 at FM 1379, go S 11 mi to FM 1357, turn left & cont. 3.7 mi, turn W into cattleguard "D" & on 0.4 mi, & S 0.1 mi					
City:	Midkiff	County:	Glasscock	Zip Code:	79755

II. FACILITY AND SITE INFORMATION							
A. Name and Type of Facility:	Schrock Wm No. 38 Increased Throughput		X	Permanent		Portable	
B. PBR claimed under 30 TAC § 106 *(List all that apply in hard copy, or choose all that apply from the drop down menus in electronic version):*							
§106. 352 (9/4/00)		§106.					
§106.		§106.					
Are you claiming historical standard exemption or PBR?		YES	X	NO	If "YES" enter effective date and Rule No.:		
C. Is there a previous Standard Exemption or PBR for the facility in this registration? (Attach details regarding changes)						YES X	NO
If "YES," enter Registration Number and Rule Number:	72355				106.352 (9/4/00)		
D. Are there any other facilities at this site which are authorized by an Air Standard Exemption or PBR?						X YES	NO
If "YES," enter Registration Number and Rule Number:	106.352 (9/4/00)						
E. Are there any other air preconstruction permits at this site?		X YES		NO	If "YES," enter Permit Nos.:		72355
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.:		
F. Is this facility located at a site required to obtain a federal operating permit pursuant to 30 TAC Chapter 122?					YES	X NO	To Be Determined
If the site currently has an existing federal operating permit, enter the permit number:					Permit No.:		
Identify the requirements of 30 TAC Chapter 122 that will be triggered if this claim is accepted: (check all that apply)							
	Initial Application for an FOP			Significant Revision for SOP		Minor Revision for SOP	
	Operational Flexibility/Off Permit Notification for an SOP			Revision for GOP		To Be Determined	X None
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 application/revision application (submitted or under APD review)				X	N/A	
G. TCEQ Account Identification Number *(if known):*							

III. FEE INFORMATION						
To determine if a fee is required answer the following questions. If "YES," to question III. A., a fee is not required, skip to Section IV. If "NO" to answer III. A., then go to Section III. B. See Section VI for address to send fee or go to www2.tceq.state.tx.us/epay *to pay online*						
A. Is this registration an update to a previously registered 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 "YES," 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
Is this registration submitted by a governmental entity with a population of less than 10,000?					YES X	NO
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:	$450			

IV. 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 Handling, Storage and Drying §106.283 **Auto Body Refinishing Facilities** §106.436 **Air Curtain Incinerator** §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")	YES	NO
B. Distance from this facility's emission release point to the nearest property line:	**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			
Registrants must be in compliance with all applicable state and federal regulations and standards to claim a PBR .			
A. Is Confidential information submitted and properly marked "CONFIDENTIAL" with this registration?		YES X	NO
B. Is a process flow diagram or a process description attached?	X	YES	NO
C. Are emissions data and calculations for this claim 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)*	X	YES	NO
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/operator of these facilities must possess NO_x allowances equivalent to the actual NO_x emissions from these facilities.			
E. Is information attached showing how the specific PBR requirements are met for this registration? *(PBR checklists may be used, but are optional)*	X	YES	NO
F. Distance from this facility's emission release point to the nearest property line:	2534	feet	
Distance from this facility's emission release point to the nearest off-property structure:	5280	feet	
Note: In limited cases, a map or drawing of the site and surrounding land use may be requested during the technical review or at the request of the TCEQ Regional Office or local air pollution control program during an investigation.			

TCEQ

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 payment		
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 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 - 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 electronically. 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 **Hand Delivery, Overnight Mail** MC 161, 12100 Park 35 Circle, Building F, First Floor, Room 1206, Austin, Texas 78753 **Facsimile** (512) 239-2123 (*do not follow fax with paper copies*)	Originals - Form PI-7, Core Data Form; all attachments
2. 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

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

144380

I. REGISTRANT INFORMATION							
A. TCEQ Customer Reference Number:	CN600129373	TCEQ Regulated Entity Number:	RN	104299359			
Note: If no CN or RN number was entered above, please fill out the required Core Data Form, which will be available in Step II of the submittal process.							
B. Company or Other Legal Customer Name:	**BP America Production Company**						
Company Official Contact Name:	**Scott Carrell**	Title:	**Air Quality Specialist**				
Mailing Address:	**P.O. Box 3092**						
City:	**Houston**	State:	**TX**	Zip Code:	**77253-3092**		
Phone:	**(281) 366-8431**	Fax:	**(281) 366-7945**	E-mail:	**scott.carrell@bp.com**		
C. Technical Contact Name:	**Scott Carrell**	Title:	**Air Quality Specialist**				
Company:	**BP America Production Company**						
Mailing Address:	**P.O. Box 3092**						
City:	**Houston**	State:	**TX**	Zip Code:	**77253-3092**		
Phone:	**(281) 366-8431**	Fax:	**(281) 366-7945**	E-mail:	**scott.carrell@bp.com**		
D. Facility Location Information - Street Address:							
If no street address, provide written driving directions to the site: *(attach description if additional space is needed)*							
From Hwy 158 at FM 1379, go S 11 mi to FM 1357, turn left & cont. 3.7 mi, turn W into cattleguard "D" & on 0.4 mi, & S 0.1 mi							
City: **Midkiff**		County: **Glasscock**		Zip Code: **79755**			

II. FACILITY AND SITE INFORMATION									
A. Name and Type of Facility:	**Schrock Wm No. 38 Increased Throughput**		X	Permanent		Portable			
B. PBR claimed under 30 TAC § 106 *(List all that apply in hard copy, or choose all that apply from the drop down menus in electronic version):*									
§106. **352 (9/4/00)**		§106.							
§106.		§106.							
Are you claiming historical standard exemption or PBR?		YES	X	NO	If "YES" enter effective date and Rule No.:				
C. Are you registering a grandfathered facility? *If "YES," attach documentation of construction date*			YES	X	NO				
D. Is there a previous Standard Exemption or PBR for the facility in this registration? (Attach details regarding changes)							YES	X	NO
If "YES," enter Registration Number and Rule Number:	**72355**				**106.352 (9/4/00)**				
E. Are there any other facilities at this site which are authorized by an Air Standard Exemption or PBR?						X	YES		NO
If "YES," enter Registration Number and Rule Number:	**106.352 (9/4/00)**								
F. Are there any other air preconstruction permits at this site?		X	YES		NO	If "YES," enter Permit Nos.:			**72355**
G. Is this site required to obtain an air federal operating permit?			YES	X	NO	If "YES," enter Permit No.:			
H. TCEQ Account Identification Number *(if known):*									

III. FEE INFORMATION						
To determine if a fee is required answer the following questions. If "YES," to question III. A., a fee is not required, skip to Section IV. If "NO" to answer III. A., then go to Section III. B. See Section VI for address to send fee or go to www2.tceq.state.tx.us/epay *to pay online*						
A. Is this registration an update to a previously registered 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 "YES," 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?					YES	X NO
Does this business have less than 1 million dollars in annual gross receipts?					YES	X NO
Is this registration submitted by a governmental entity with a population of less than 10,000?					YES	X NO
C. Check Money Order or Transaction Number *(Payable to TCEQ)*:	**801384350**				YES	X NO
Company Name on Check:	**BP America Production Company**	Fee Amount:	**$450**			

IV. 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 Handling, Storage and Drying §106.283 Auto Body Refinishing Facilities §106.436 Air Curtain Incinerator §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")		YES	NO
B. Distance from this facility's emission release point to the nearest property line:	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				
Registrants must be in compliance with all applicable state and federal regulations and standards to claim a PBR .				
A. Is confidential information submitted and properly marked "CONFIDENTIAL" with this registration?		YES	X	NO
B. Is a process flow diagram or a process description attached?	X	YES		NO
C. Are emissions data and calculations for this claim 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)*	X	YES		NO
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/operator of these facilities must possess NO_x allowances equivalent to the actual NO_x emissions from these facilities.				
E. Is information attached showing how the specific PBR requirements are met for this registration? *(PBR checklists may be used, but are optional)*	X	YES		NO
F. Distance from this facility's emission release point to the nearest property line:				**feet**
Distance from this facility's emission release point to the nearest off-property structure:		**5280**		**feet**
Note: In limited cases, a map or drawing of the site and surrounding land use may be requested during the technical review or at the request of the TCEQ Regional Office or local air pollution control program during an investigation.				

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:

- Please provide a flow diagram that indicates what equipment and emission points are at the site.
- 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% H_2S and provide H_2S emissions for fugitives in light liquid service.
- Please provide H_2S emissions for the tank(s).
- Please provide information, and documentation if available, on the H_2S 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.

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.

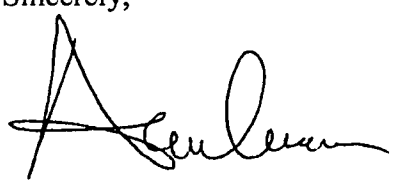
If, within six months from the date of this letter, you find that you cannot meet the conditions of the PBR, you may apply for a permit or amendment using the Form PI-1 (General Application for Air Preconstruction Permits and Amendments) to the same address and apply the fee for this request to that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

bp

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 H_2S 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
- H_2S emissions have been estimated in the attached fugitive emission estimates
- H_2S emissions have been included in the attached E&P Tank runs
- H_2S sample information for the oil is sampled by our field personnel upon request. The oil sampling company does not test for H_2S due to their equipment limitations. The sample is tested separately, and H_2S mole percent is normalized into the final oil output (see the Pressurized Liquid H_2S 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.

APIRT
FEB 1 1 2009

bp

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.

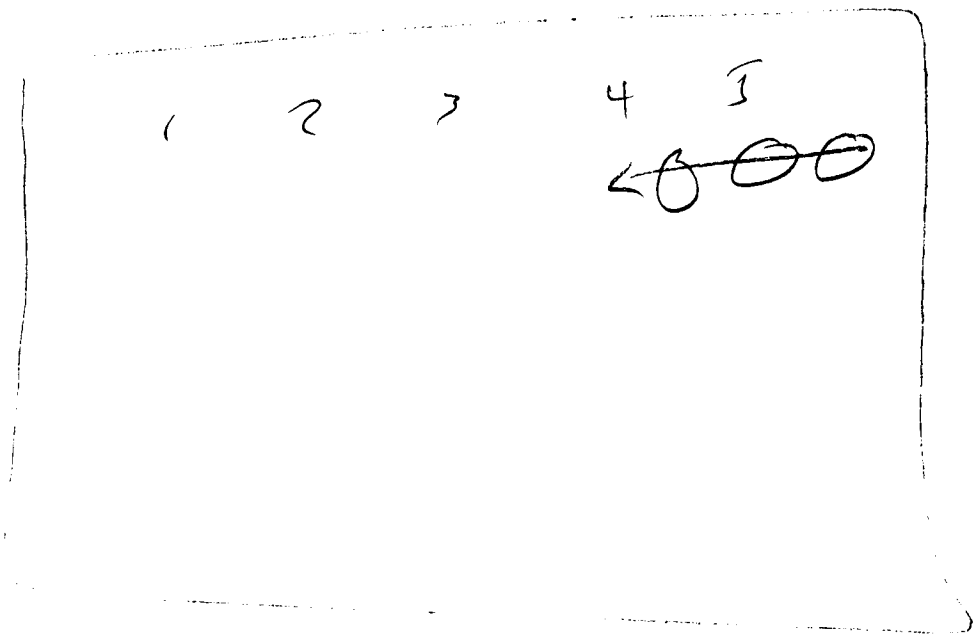
Sincerely,

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

PI-7-CERT



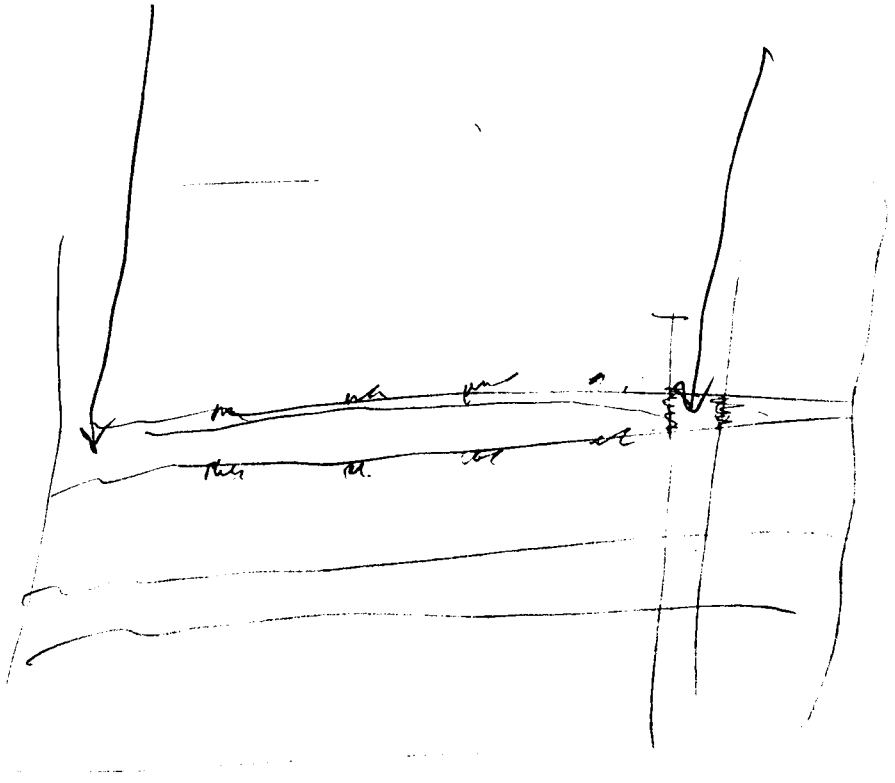
APD-CERT

PROCESS DESCRIPTION

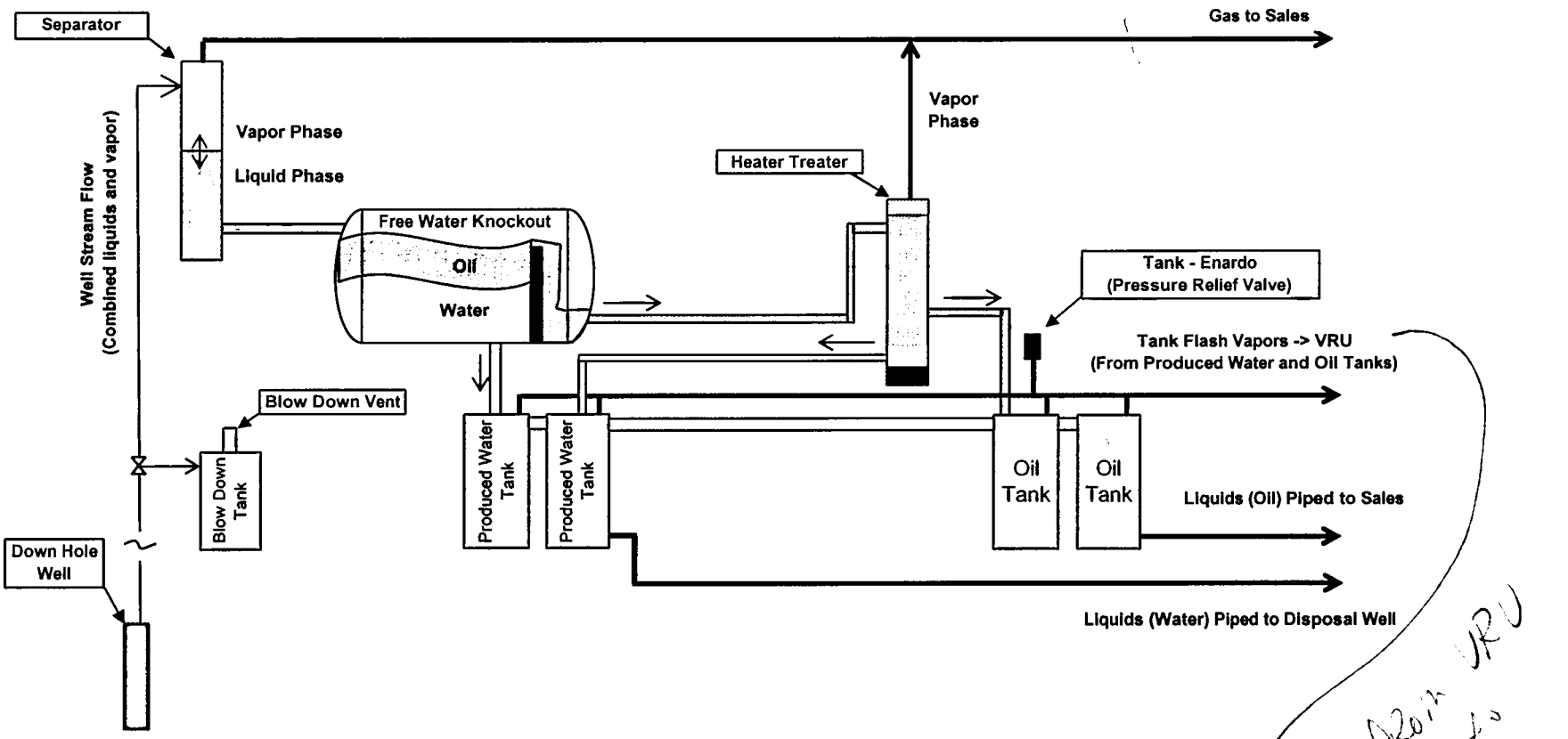
BP American Production Company
Schrock, WM. 38 Battery
Process Description

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

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

1. 30 TAC § 106.4(a)(1) & (4): Emission limits

List emissions in tpy for each facility (add additional pages or table if needed):

SO_2 =	--	PM_{10}	--	VOC=	13.77	NO_x =	--	CO =	--	Other	Formaldehyde =	--	Other	H2S =	0.023
SO_2 =	--	PM_{10}	--	VOC=	1.33	NO_x =	--	CO =	--	Other	Formaldehyde =	--	Other	H2S =	--
SO_2 =	--	PM_{10}	--	VOC=	6.22	NO_x =	--	CO =	--	Other	Formaldehyde =	--	Other	H2S =	0.003
SO_2 =	0.05	PM_{10}	0.02	VOC=	0.01	NO_x =	0.21	CO =	0.18	Other	Formaldehyde =	0.0002	Other	H2S =	--
SO_2 =	--	PM_{10}	--	VOC=	2.55	NO_x =	--	CO =	--	Other	Formaldehyde =	--	Other	H2S =	0.0003
SO_2 =	--	PM_{10}	--	VOC=	0.62	NO_x =	--	CO =	--	Other	Formaldehyde =	--	Other	H2S =	0.0003
Total	0.05	PM_{10}	0.02	VOC=	24.50	NO_x =	0.21	CO =	0.18	Other	Formaldehyde =	< 0.001	Other	H2S =	0.026

• Are the SO_2, PM_{10}, VOC, or other air contaminant emissions claimed for each facility in this PBR submittal less than 25 tpy?	X	YES	NO
• Are the NO_x and CO emissions claimed for each facility in this PBR submittal less than 250 tpy?	X	YES	NO
If the answer to both is "Yes," continue to the question below. If the answer to either question is "No," a PBR cannot be claimed.			
Has any facility at the property had public notice and opportunity for comment under 30 TAC Section 116 for a regular permit or permit renewal? (This does not include public notice for voluntary emission reduction permits, grandfathered existing facility permits, or		YES X	NO
If "Yes," skip to Section 2. If "No," continue to the questions below.			
If the site has had no public notice, please answer the following:			
• Are the SO_2, PM_{10}, VOC, or other emissions claimed for all facilities in this PBR submittal less than 25 tpy?	X	YES	NO
• Are the NO_x and CO emissions claimed for all facilities in this PBR submittal less than 250 tpy?	X	YES	NO
If the answer to both questions is "Yes," continue to Section 2.			
If the answer to either question is "No," a PBR cannot be claimed. A permit will be required under Chapter 116.			

2. 30 TAC § 106.4(a)(2): Nonattainment check

Are the facilities to be claimed under this PBR located in a designated ozone nonattainment county?		YES X	NO
If "Yes," please indicate which county by checking the appropriate box to the right.			
(Marginal) - Hardin, Jefferson, and Orange counties *(BPA)*		BPA	
(Moderate) - Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller counties *(HGA)*		HGA	
(Moderate) - Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, and Tarrant counties *(DFW)*		DFW	
If "Yes," to any of the above, continue to the next question. If "No," continue to Section 3.			
Does this project trigger a nonattainment review? To determine the answer, review the information below:			
• Is the project's potential to emit (PTE) for emissions of VOC or NO_x increasing by 100 tpy or more? *PTE is the maximum capacity of a stationary source to emit any air pollutant under its worst-case physical and operational design unless limited by a permit, rule, or made federally enforceable by a certification.*		YES	NO
• Is the site an existing major nonattainment site and are the emissions of VOC or NO_x increasing by 40 tpy or more?		YES	NO
If needed, attach contemporaneous netting calculations per nonattainment guidance.			
Additional information can be found at: **www.tceq.state.tx.us/permitting/air/forms/newsourcereview/tables/nsr_table8.html** and **www.tceq.state.tx.us/permitting/air/nav/air_docs_newsource.html**			
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: **apd@tceq.state.tx.us**			
If "Yes," to any of the above, the project is a major source or a major modification and a PBR may not be used.			
A Nonattainment Permit review must be completed to authorize this project. If "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?	YES X NO
Are emissions of any criteria pollutant increasing by 250 tpy of any criteria pollutant at an unnamed source?	YES X NO
Are emissions increasing above significance levels at an existing major site?	YES X NO
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	
• Will all facilities under this PBR meet applicable requirements of Title 40 Code of Federal Regulations (40 CFR) Part 60, New Source Performance Standards (NSPS)? If "Yes," which Subparts are applicable?:	YES NO X N/A
• Will all facilities under this PBR meet applicable requirements of 40 CFR Part 63, Hazardous Air Pollutants Maximum Achievable Control Technology (MACT) standards? If "Yes," which Subparts are applicable?:	YES NO X N/A
• Will all facilities under this PBR meet applicable requirements of 40 CFR Part 61, National Emissions Standards for Hazardous Air Pollutants (NESHAPs)? If "Yes," which Subparts are applicable?:	YES NO X N/A
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: apd@tceq.state.tx.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
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_x Cap and Trade	
• Is the facility located in Harris, Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, or Waller County? *If "Yes," answer the question below.* ***If "No," continue to Section 7.***	YES X NO
• Will the proposed facility or group of facilities obtain required allowances for NO_x if they are subject to 30 TAC Chapter 101, Subchapter H, Division 3 (relating to the Mass Emissions Cap and Trade Program)?	YES NO
7. Highly Reactive Volatile Organic Compounds (HRVOC) check	
• Is the facility located in Harris County? *If "Yes," answer the next question.* ***If "No," skip to the box below.***	YES X NO
• Will the project be constructed after June 1, 2006? *If "Yes," answer the next question. If "No," skip to the box below.*	YES NO
• Will one or more of the following HRVOC be emitted as a part of this project?	YES NO
If "Yes," complete the information below: lb/hr tpy	
1,3-butadiene	
all isomers of butene (e.g., isobutene [2-methylpropene or isobutylene])	
alpha-butylene (ethylethylene)	
beta-butylene (dimethylethylene, including both cis- and trans-isomers)	
ethylene	
propylene	
• Is the facility located in Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, or Waller County? *If "Yes," answer the next question.* ***If "No," the checklist is complete.***	YES X NO
• Will the project be constructed after June 1, 2006? *If "Yes," answer the next question. If "No," the checklist is complete.*	YES NO
• Will one or more of the following HRVOC be emitted as a part of this project?	YES NO
If "Yes," complete the information below: lb/hr tpy	
ethylene	
propylene	

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 or gas production facility
			Carbon dioxide separation facility
			Oil or gas pipeline facility
	The facilities at the site include (check all that apply):____ sulfur recovery units X one or more tanks X separators X free water knockouts __ gunbarrels X heater treaters ____ dehydration units __ gas sweetening & other gas conditioning facilities __ natural gas liquids recovery units		X YES NO
	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 § 106.492, respectively? Attach data showing how the exemptions are met. Checklists are available.		YES NO (X NA)
	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, 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? Attach a scaled map.		X YES NO (__ NA)
	Are total emissions of sulfur compounds, excluding sulfur oxides, less than 4.0 pounds per hour? Attach calculations.		X YES NO (__ NA)
	Does the height of each vent emitting sulfur compounds meet or exceed the minimum vent height stated in 30 TAC § 106.352? List stack height: _____ **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.**		X YES NO (__ NA)

BP America Production Company
Schrock, Wm No. 38 Facility
106.352 Sulfur Compounds Calculation

Calculation Information:

Max Inlet H2S Concentration:	118.00 ppm =	0.01180%
Max Inlet Natural Gas Flowrate:	0.290 mmscf / day	
Molecular Weight of Sulfur:	32.06 lb / lb-mole	
Gas Constant[1]:	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

Sulfur = **0.000013** **long tons/day**
0.0012 **lbs/hr**

[1] 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**

Component	Molecular Weight	Weight %	Weighted Average	Mol %	Corrected Mol % (w/ H2S)
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%	0.776	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		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

Componen	Mole %	MW lb/lb-mole	Component lb/lb-mole	Wt % 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 TOC Gas Stream that is VOC (C3+)				39.15%

EMISSIONS INFORMATION:
SITE EMISSIONS SUMMARY
EMISSIONS CALCULATIONS

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

Description	Emissions (tpy)						
	NO_x	CO	PM	SO_2	VOC	H_2S	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 Tanks[1] E&P

Component		Total Emissions (lb/hr)	Total Emissions (tpy)	VRU Controlled (lb/hr)	VRU Controlled (tpy)
H2S	H2S	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
Total 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

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 Efficien	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 Ratio Test Case Scenario			E&P Run (100 bopd)		
No	Component	200 Uncontrolled [ton/yr]	BOPD Uncontrolled [lb/hr]	Component	100 Jncontrolle [ton/yr]	BOPD Jncontrolled [lb/hr]	Component	100 Uncontrolled [ton/yr]	BOPD Uncontrolled [lb/hr]
H2S	H2S	0.275	0.063	H2S	0.1375	0.0315	H2S	0.138	0.032
Oxygen	O2	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	0.011	E-Benzene	0.023	0.0055	E-Benzene	0.023	0.005
Xylenes	Xylenes	0.102	0.023	Xylenes	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
	224Trimethyl	0	0	224Trimethylp	0	0	224Trimethyl	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

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 H_2S
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%	139.06
H2S	34.08	0.016%	0.004	0.0118%	0.0118%	3.06
Methane	16.04	43.531%	10.899	67.942%	67.942%	8,299.11
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%	0.00
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%	19,064.92

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 :

Total as H2S (lb/hr)	Min Vent Ht (ft)
0	0
0.27	20

Vent Ht (ft) = Interpolate => (20 - 0)/(0.27 - 0) = 74.07 = ((20 - x)/(0.27-0.13)
Vent Ht (ft) = 9.451
Vent Ht (ft) = 9.451 Min Stack Height is 20 ft

Per 30 TAC 106.352(4):

Stack Height (ft)	H_2S Emissions (lbs/hr)
0	0
20	0.27
30	0.6
50	1.94
60	3
68	4

Example Calculations[3]:

Emissions (lbs)[1] = Q,scf x MW, lb_c/lb-$mole_c$ x mol%, lb-$mole_c$/lb - $mole_g$ x 1/C, lb-$mole_g$/scf

Notes:

[1] 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
SO_2[3]	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) = 0.50 MMBtu/hr / 1020 MMBtu/MMscf * 7.6 lb/MMscf = 0.0037
PM Emissions (tpy) = 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/10^6 scf (= 3.18 ppm H_2S). Emission factor is converted to other natural gas sulfur contents by multiplying the SO_2 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.
[2] Based on 6/13/2008 Schrock, Wm No. 38 Fuel Gas Analysis VOC wt%
[3] Based on counts from the FEC.

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

Component	Mole %	MW lb/lb-mole	Component lb/lb-mole	Wt % 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 Gas Stream that is VOC (C3+)	**39.15%**

E&P TANK RUN

```
**********************************************************************************************
*     Project Setup 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    : Low Pressure Oil
Entering Air Composition  : 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     : 93.00[F]
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       O2                    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      224Trimethylp         0.0000

-- Sales Oil -------------------------------------------------------------------------------
Production Rate           : 200[bbl/day]
Days of Annual Operation  : 365 [days/year]
API Gravity               : 37.9
Reid Vapor Pressure       : 5.90[psia]


**********************************************************************************************
*     Calculation Results                                                                    *
**********************************************************************************************

-- Emission Summary ------------------------------------------------------------------------
Item                Uncontrolled   Uncontrolled
                    [ton/yr]       [lb/hr]
```

Total HAPs	2.490	0.568
Total HC	194.087	44.312
VOCs, C2+	185.859	42.434
VOCs, C3+	160.187	36.572

Uncontrolled Recovery Info.

Vapor	9.2100	[MSCFD]
HC Vapor	9.2000	[MSCFD]
GOR	46.05	[SCF/bbl]

-- Emission Composition ----------

No	Component	Uncontrolled [ton/yr]	Uncontrolled [lb/hr]
1	H2S	0.275	0.063
2	O2	0.000	0.000
3	CO2	0.000	0.000
4	N2	0.000	0.000
5	C1	8.228	1.879
6	C2	25.672	5.861
7	C3	84.406	19.271
8	i-C4	8.863	2.024
9	n-C4	32.954	7.524
10	i-C5	7.855	1.793
11	n-C5	10.595	2.419
12	C6	7.419	1.694
13	C7	4.309	0.984
14	C8	1.033	0.236
15	C9	0.261	0.060
16	C10+	0.000	0.000
17	Benzene	0.328	0.075
18	Toluene	0.224	0.051
19	E-Benzene	0.046	0.011
20	Xylenes	0.102	0.023
21	n-C6	1.791	0.409
22	224Trimethylp	0.000	0.000
	Total	194.361	44.375

-- Stream Data ----------

No.	Component	MW	LP Oil mol %	Flash Oil mol %	Sale Oil mol %	Flash Gas mol %	W&S Gas mol %	Total Emissions mol %
1	H2S	34.80	0.0118	0.0079	0.0001	0.1827	0.1818	0.1821
2	O2	32.00	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
3	CO2	44.01	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
4	N2	28.01	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
5	C1	16.04	0.7420	0.1466	0.0000	26.6676	3.4329	11.5592
6	C2	30.07	1.2380	0.7175	0.0030	23.8999	16.7365	19.2419
7	C3	44.10	3.3880	2.8445	0.6612	27.0543	51.7919	43.1399
8	i-C4	58.12	0.7600	0.7182	0.5764	2.5785	3.8983	3.4367
9	n-C4	58.12	4.3000	4.1560	3.7185	10.5699	13.9661	12.7783
10	i-C5	72.15	2.4410	2.4447	2.4401	2.2802	2.5469	2.4536
11	n-C5	72.15	4.4420	4.4728	4.5197	3.1022	3.4213	3.3097
12	C6	86.16	9.0430	9.2075	9.5268	1.8788	2.0508	1.9906
13	C7	100.20	13.9870	14.2867	14.8778	0.9385	1.0350	1.0012
14	C8	114.23	9.5090	9.7229	10.1469	0.1943	0.2179	0.2097
15	C9	128.28	6.1620	6.3026	6.5814	0.0421	0.0508	0.0478
16	C10+	252.33	37.4542	38.3144	40.0233	0.0000	0.0000	0.0000
17	Benzene	78.11	0.5250	0.5350	0.5545	0.0894	0.0977	0.0948
18	Toluene	92.13	1.1010	1.1251	1.1728	0.0511	0.0566	0.0547
19	E-Benzene	106.17	0.6110	0.6248	0.6522	0.0091	0.0102	0.0098
20	Xylenes	106.17	1.5540	1.5892	1.6591	0.0199	0.0225	0.0216
21	n-C6	86.18	2.7310	2.7836	2.8862	0.4414	0.4830	0.4684
22	224Trimethylp	114.24	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	MW		149.66	152.21	156.92	38.27	46.78	43.81
	Stream Mole Ratio		1.0000	0.9775	0.9358	0.0225	0.0417	0.0642
	Heating Value	[BTU/SCF]				2198.02	2654.71	2494.98
	Gas Gravity	[Gas/Air]				1.32	1.61	1.51
	Bubble Pt. @ 100F	[psia]	41.00	19.84	6.69			

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

OIL ANALYSES

Mobile Analytical Laboratories, Inc.
LABORATORIES IN ODESSA, GIDDINGS & STACY DAM
Billing Address: P.O. BOX 69210 • ODESSA, TEXAS 79769-0210
Shipping Address: 2800 WESTOVER STREET • ODESSA, TEXAS 79764
PHONE (432) 337-4744
FAX (432) 337-6781

NOVEMBER 20, 2003

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

SAMPLE ID: LAB NO. 1329:
LANE #37 TANK BATTERY, SAMPLED 11/05/03
26 PSIG @ 93 DEG.F, 76 BBL/DAY

COMPONENT	MOL %
METHANE	0.742
ETHANE	1.238
PROPANE	3.388
ISOBUTANE	0.760
N-BUTANE	4.301
ISOPENTANE	2.441
N-PENTANE	3.663
NEOHEXANE	0.009
CYCLOPENTANE	0.780
2-METHYLPENTANE	1.716
3-METHYLPENTANE	1.347
N-HEXANE	2.731
METHYLCYCLOPENTANE	3.568
BENZENE	0.525
CYCLOHEXANE	2.404
2-METHYLHEXANE	0.758
3-METHYLHEXANE	1.818
DIMETHYLCYCLOPENTANES	4.510
N-HEPTANE	2.334
METHYLCYCLOHEXANE	4.569
TRIMETHYLCYCLOPENTANES	1.071
TOLUENE	1.101
2-METHYLHEPTANE	2.570
3-METHYLHEPTANE	0.701
DIMETHYLCYCLOHEXANES	3.017
N-OCTANE	2.151
ETHYL BENZENE	0.611
M&P-XYLENES	1.277
O-XYLENE	0.277
C9 NAPHTHENES	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
METHOD: GC/FID

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/dt

Mobile Analytical Laboratories, Inc.

LABORATORIES IN ODESSA, GIDDINGS & STACY DAM
Billing Address: P.O. BOX 69210 • ODESSA, TEXAS 79769-0210
Shipping Address: 2800 WESTOVER STREET • ODESSA, TEXAS 79764
PHONE (432) 337-4744
FAX (432) 337-8781

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:

	RVP	API GRAVITY 60 °F
LAB NO. 1333: UNIVERSITY WADDELL DEVONIAN TEMP 76°F	8.4#	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

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

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	Sample Pressure:	21
Lease:	Schrock 38	Sample Temp:	119
Station #:	Meter #10	Date Sampled:	6/13/2008
Date Run:	6/16/2008	Sampled by:	CB
Lab Ref #:	08-JUN-44786	Field Gravity:	
Cylinder:		Field H2S:	0.0010
Analyzed by:	David		

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

	Mole %	14.65 psia GPM (Ideal)	14.73 psia GPM (Ideal)	14.65 psia BTU (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

Dry	Wet	
1458	1444	BTU/Real Cu.Ft.
0.8661	0.8687	Specific Gravity (Real)
1450	1426	BTU/Ideal Cu.Ft.
0.8618	0.8576	Specific Gravity (Ideal)
Z Factor :	0.9947	

GASOLINE CONTENT (GPM/Real)

Ethane and Heavier	8.8091
Propane and Heavie	5.5308
Butane and Heavier	2.9074
Pentane and Heavie	1.5796

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

<<Prev Rule

Next Rule>>

Texas Administrative Code

TITLE 30	ENVIRONMENTAL QUALITY
PART 1	TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
CHAPTER 106	PERMITS BY RULE
SUBCHAPTER A	GENERAL REQUIREMENTS
RULE §106.4	**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 (SO_2) or inhalable particulate matter (PM_{10}); 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 SO_2 or PM_{10}; 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

Next Page Previous Page

List of Titles Back to List

HOME | TEXAS REGISTER TEXAS ADMINISTRATIVE CODE | OPEN MEETINGS | HELP |

<<Prev Rule

Next Rule>>

Texas Administrative Code

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

<<Prev Rule

Texas Administrative Code

Next Rule>>

TITLE 30	ENVIRONMENTAL QUALITY
PART 1	TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
CHAPTER 106	PERMITS BY RULE
SUBCHAPTER Q	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 (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.

(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

Next Page Previous Page

Figure: 30 TAC 106.352(4)

Total as Hydrogen Sulfide, lb/hr	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.