



0000-0000-0020-9510

Document Control Sheet

Sheet Title:	AIR CP 63 BP
Box ID:	7896
Control Sheet ID:	0000-0000-0020-9510
Record Series Name:	OCE / Air Compliance
Record Series:	AIR CP
Primary ID:	110134210
Secondary ID:	
Doc Type:	Compliance
Security:	Public
Date:	6/12/2017 12:00AM
Title:	Audit
Tertiary ID	



**PDC
ENERGY**

Corporate Office
1775 Sherman Street, #3000
Denver, Colorado 80203
303.860.5800
www.petd.com

MR CP-110134210-CP-20170612-Audit

RECEIVED

JUL 17 2017

COMPLIANCE & ENFORCEMENT

July 12, 2017

Sent via USPS Certified Mail, return receipt requested, no. 91 7199 9991 7037 8032 3887

Mr. Ramiro Garcia, Jr.
Office of Compliance and Enforcement, MC 172
TCEQ
PO Box 13087
Austin, TX 78711-3087

RECEIVED

OCT 30 2018

TCEQ
CENTRAL FILE ROOM

RE: Request for extension of corrective action deadline – PDC Energy, Inc. –
**Investigation Nos. 1389733, 1389734, 1410777, 1389732, 1389735, 1389738,
1389731, 1389737, 1389736, 1389739, 1410773, 1389740, 1389740, 1410775**

Dear Mr. Garcia:

On December 6, 2016, PDC Energy, Inc. (PDC Energy) purchased all of the equity interest of Arris Petroleum Corporation (Arris), and on that date, changed the name of Arris to PDC Permian, Inc. (PDC Permian). In accordance with Section 10(g-1) of the Environmental, Health, and Safety Audit Privilege Act (Audit Act), PDC Energy began an air quality environmental compliance audit prior to the acquisition of all Arris oil and gas facilities on August 24, 2016 (Audit). The scope of the Audit is to evaluate compliance with applicable air quality regulations, as well as all applicable air quality permits. Pursuant to Section 4(d-1) of the Audit Act, PDC Energy and its wholly-owned subsidiary, PDC Permian, is continuing the Audit after the acquisition closing, December 6, 2016, for all facilities acquired.

On January 20, 2017, PDC submitted to TCEQ a notice of intent to continue the pre-acquisition audit, as well as a voluntary disclosure of violations discovered at 11 facilities (Initial Disclosure Facilities) as of the date of that letter. On April 19, 2017, PDC notified TCEQ of several additional violations discovered during the Audit at PDC's Westeros Compressor Station (RN108836016). On May 5, 2017, PDC requested permission to extend the Audit period, and TCEQ granted the extension request by letter dated May 24, 2017. The self-audit investigations must be completed by September 5, 2017 (Audit Completion Deadline).

PDC's January 20, 2017 notice of violations at the Initial Disclosure Facilities reflected the violations PDC had discovered before the acquisition closing date. PDC is continuing its diligent review of those 11 facilities and the rest of the facilities subject to the Audit. Should other compliance issues be found at the Initial Disclosure Facilities, PDC will disclose the additional findings by the Audit Completion Deadline.

RECEIVED

JUL 17 2017

Enforcement Division

By letter dated May 30, 2017, TCEQ set a corrective action completion deadline for the Initial Disclosure Facilities of July 20, 2017. PDC respectfully requests an extension of that deadline to January 13, 2018, which is the date PDC proposed as a target completion date in its January 20, 2017 disclosure. PDC has reasonable grounds for this request. All of these Initial Disclosure Facilities required updates to the registration for the source. In PDC's additional review, we are gathering information and assessing applicability to various NSPS or other regulations, information which will be necessary when updating the registration. To avoid duplicative or incomplete registrations, completing or amending registration for these sources should occur after PDC completes the audit in September. Finally, PDC is working diligently to implement any compliance measures in the field.

Given the rapidly approaching July 20 deadline, PDC appreciates TCEQ's prompt consideration of this request. Should TCEQ grant this extension request, the completion deadline for the corrective action for the Initial Disclosure Facilities would be January 13, 2018. Please do not hesitate to contact me at (303) 831-3969 or [REDACTED] if you have any questions or require further information regarding this matter. Thank you for your consideration.

Sincerely,



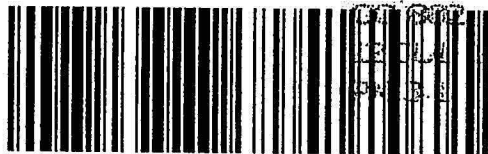
Sarah Bartlett
EHS Manager

cc: Adell Heneghan, PDC Energy, Inc.
Randy Dann, Davis Graham & Stubbs LLP
TCEQ Regional Office Director
Litigation Division Audit Act Program Staff

DAVIS
GRAHAM &
STUBBS

1550 17th Street, Suite 500
Denver, CO 80202

CERTIFIED MAIL



91 7199 9991 7037 8032 3887

Mr. Ramiro Garcia, Jr.
Office of Compliance and Enforcement, MC 172
TCEQ
PO Box 13087
Austin, TX 78711-3087

RECEIVED
JUL 17 2017
COMPLIANCE & ENFORCEMENT

78711-308787



U.S. POSTAGE >> PITNEY BOWES



ZIP 80202 \$ 005.26⁰
02 4W
0000347135 JUL 12 2017

RECEIVED

JUL 17 2017

TCEQ MAIL CENTER
BC

