

From: Tellez, Andres <ANDRES.TELLEZ@pxd.com>
Sent: Friday, August 2, 2024 1:04 PM
To: Thomas Greinert
Cc: Mathis, Matt; Pemberton, Kevin; Crystal Delacruz; Trishia McDonald
Subject: RE: [External] - RE: TCEQ Air Permit No. 169792 / Project No. 376201 at Pioneer Natural Resources USA, Inc.'s McMorries A-140h Tank Battery site
Attachments: McMorries A-140H Pg 61 Replacement Letter.pdf

Mr. Thomas Greinert,

The scope of this project is spelled out in our cover letter. And per our applicability determination on page 62, you can see that the referenced H2S treatment does not qualify as a OOOOb sweetening unit. That said, we can dive into more specifics that are not so clearly deduced from the application language.

Since the scope of this current project does not include new OOOOb sources, we did not spell out that due to post-December 6, 2022 well additions the site is now a storage vessel affected facility. That said, we have indicated our compliance with OOOOb storage vessel requirements on page 62. What is likely confusing is on page 61 we indicated that storage vessels are applicable to OOOOa. That was an oversight and we have attached an updated replacement page indicating such. Our position and compliance on applicable OOOOa compressors, pumps, controllers, and fugitive LDAR remain unchanged.

Represented updates to our AOS and MSS activities that are derived from OOOOb production or storage vessels are applicable to OOOOb, and as such;

- Pioneer will address performance testing requirements for control devices within 180 days of startup, and
- Pioneer will address initial compliance with requirements for storage vessel affected facilities within 180 days of startup.

Please advise if this answers your question adequately to proceed with the application review. If not, can we please have a follow up call to discuss?

Thanks,

Andres Tellez
Sr. HSE Specialist, Air Permitting
o 972.969.1895
m 972.975.2561
ANDRES.TELLEZ@pxd.com

PIONEER
NATURAL RESOURCES

From: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>
Sent: Wednesday, July 31, 2024 1:49 PM
To: Tellez, Andres <ANDRES.TELLEZ@pxd.com>
Cc: Mathis, Matt <Matt.Mathis@pxd.com>; Pemberton, Kevin <Kevin.Pemberton@pxd.com>; Crystal Delacruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>
Subject: RE: [External] - RE: TCEQ Air Permit No. 169792 / Project No. 376201 at Pioneer Natural Resources USA, Inc.'s Mcmorries A-140h Tank Battery site

Good afternoon,

Management has granted an extension until Friday, August 2nd.

Failure to submit all of the requested information by **August 2, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-1S (Registrations for Air Standard Permit) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 116. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

Thomas Greinert
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-2254
thomas.greinert@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at
www.tceq.texas.gov/customersurvey

From: Tellez, Andres <ANDRES.TELLEZ@pxd.com>
Sent: Wednesday, July 31, 2024 12:25 PM
To: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>
Cc: Mathis, Matt <Matt.Mathis@pxd.com>; Crystal Delacruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Pemberton, Kevin <Kevin.Pemberton@pxd.com>
Subject: RE: [External] - RE: TCEQ Air Permit No. 169792 / Project No. 376201 at Pioneer Natural Resources USA, Inc.'s Mcmorries A-140h Tank Battery site

Mr. Thomas Greinert,

We would like to request an extension in order to properly respond to your question.

Thanks,

Andres Tellez
Sr. HSE Specialist, Air Permitting
o 972.969.1895
m 972.975.2561
ANDRES.TELLEZ@pxd.com



From: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>
Sent: Wednesday, July 31, 2024 10:32 AM
To: Tellez, Andres <ANDRES.TELLEZ@pxd.com>
Cc: Mathis, Matt <Matt.Mathis@pxd.com>; Crystal Delacruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>
Subject: [External] - RE: TCEQ Air Permit No. 169792 / Project No. 376201 at Pioneer Natural Resources USA, Inc.'s Mcmorries A-140h Tank Battery site

You don't often get email from thomas.greinert@tceq.texas.gov. [Learn why this is important](#)

Good morning,

This is a courtesy reminder that the requested information in the email sent on 7/24/2024 is due today. If for some reason the company cannot provide the requested information, then it is recommended to withdraw the project to give the company more time to gather the information and re-submit when the application is complete.

Thanks in advance for your time and cooperation. Let me know if you have questions or concerns.

Thomas Greinert

Rule Registration Team

Air Permits Division, Office of Air, TCEQ

(512) 239-2254

thomas.greinert@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Thomas Greinert

Sent: Wednesday, July 24, 2024 10:08 AM

To: ANDRES.TELLEZ@PXD.COM

Cc: MATT.MATHIS@PXD.COM; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>

Subject: TCEQ Air Permit No. 169792 / Project No. 376201 at Pioneer Natural Resources USA, Inc.'s Mcmorries A-140h Tank Battery site

Good morning,

I am the TCEQ Air Permit Reviewer assigned to the Standard Permit No. 169792 / Project No. 376201 at Pioneer Natural Resources USA, Inc. and Mcmorries A-140h Tank Battery in Martin County, Texas. You have been identified as a Technical Contact.

I have completed my initial review for this project and will need additional information/clarification before I can proceed with my review. Please address the following:

1. In the federal applicability section of the application, it states that certain facilities at the site will fall under NSPS OOOOa and others will fall under OOOOb. However, it does not clarify what equipment is covered by each.
 1. Please clarify what pieces of equipment are under OOOOa and which are under OOOOb.

Failure to submit all of the requested information by **July 31, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-1S (Registrations for Air Standard Permit) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 116. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

If you have questions or would like to discuss this project over the phone, feel free to contact me.

Mr. Thomas Greinert

Rule Registration Team

Air Permits Division, Office of Air, TCEQ

(512) 239-2254

Thomas.Greiner@tceq.texas.gov

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www.tceq.texas.gov/customersurvey

Statement of Confidentiality:

This message may contain information that is privileged or confidential. If you receive this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments.

Regulation	Applicability
<p>NSPS Subpart 0000</p> <p>Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution for Which Construction, Modification, or Reconstruction Commenced After August 23, 2011 and on or Before September 18, 2015</p>	<p>Not Applicable. The equipment at the Site commenced construction after the applicability date of this rule.</p>
<p>NSPS Subpart 0000a</p> <p>Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification, or Reconstruction Commenced After September 18, 2015 and on or Before December 6, 2022</p>	<p>Storage vessels manufactured after September 18, 2015 and on or before December 6, 2022 with potential to emit more than six (6) tons of VOC per year are subject to the rule. Storage vessels that are controlled to emit less than this by a VRU that recovers and routes emissions to a process as defined by this subpart are not subject to the storage vessel affected facility requirements of this subpart per §60.5365a(e), and will meet the applicable requirements of §60.5365a(e)(1)-(4).</p> <p>Centrifugal compressors, reciprocating compressors, pneumatic pumps, and pneumatic controllers that commenced construction, reconstruction, and modification after September 18, 2015 and on or before December 6, 2022 are subject to this rule.</p> <p>Collection of fugitive emissions components at well sites and compressor stations that commenced construction, modification, or reconstruction after September 18, 2015 and on or before December 6, 2022 are also subject to the leak detection and repair requirements listed under this rule.</p> <p>Pioneer will comply with the applicable requirements of NSPS Subpart 0000a.</p>