

February 27, 2025

Mr. Sam Short
Air Permits Division MC-163
Texas Commission on Environmental Quality
PO Box 13087
Austin, Texas 78711-3087

Via STEERS

*RE: Capitan Energy Incorporated ("Capitan" CN605627579)
Update on Inlet Separator Flaring—Ten Oil and Gas Sites*

Dear Mr. Short:

On behalf of Capitan on November 15, 2024, Trinity Consultants (Trinity) notified TCEQ Air Permits Division of its intent to qualify for a Permit by Rule (PBR) pursuant to 30 TAC § 106.352(I) for the temporary flaring of inlet separator gas at ten oil and gas sites. This letter provides an update and notification that the flaring has ceased.

Prior to commencement of temporary flaring, Capitan secured permission from the Texas Railroad Commission (RRC) and obtained appropriate authorization under 30 TAC § 116.110 for the change in method of operation in the event the regulated air contaminant levels exceeded Chapter 106 thresholds. However, flaring has ceased before the 90-day filing deadline has elapsed and emissions from the sites are below the Standard Permit applicability thresholds. Capitan will not require use of Standard Permits for authorization of the activity and will withdraw the initial notifications. The sites along with the registration numbers are referenced below in Table 1.

Each site will continue to operate pursuant to a certified PBR registration under § 106.352(I). Capitan will maintain documentation as required under 30 TAC §§ 106.4, 106.352(I) to ensure that emissions from both registered and unregistered PBR claims remain under applicable emission limitations established in those rules. At the next revision of its PBR certification, Capitan will revise its certifications to establish enforceable representations relating to flaring of sales gas, including flaring of associated gas from well affected facilities.

Table 1—Oil and Gas Sites and Anticipated Flare Volumes

Site	RN	PBR Registration No.	Standard Permit Registration No. to be Withdrawn
State Mike 3 1H	RN111625893	171373	178382
State Mike 3 2H	RN111625919	171374	178381
State Mattie 2 1H	RN111625927	171375	178380
W A State 2H	RN111095733	162630	178379
W A State 3H	RN111095709	162627	178378
Georgette State 2H	RN111095758	162633	178377
State Judy 3 1H, 3H, 4H	RN111611315	171109	178376
State Judy 3 2H	RN111611307	171108	178375

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Site	RN	PBR Registration No.	Standard Permit Registration No. to be Withdrawn
Karen Fee 17 1H	RN111095741	162632	178374
Rylan Fee 44 1H	RN111095766	162634	178373

If you have any questions, please contact me at 512-961-4471.

Yours,



Jesse Lovegren, Ph.D., P.E.
Managing Consultant
Trinity Consultants