

Dave Kubeczko - DNR

From: Dave Kubeczko - DNR
Sent: Thursday, May 02, 2013 9:01 AM
To: dave.kubeczko@state.co.us
Subject: FW: CDPHE Form 2A Comment

Categories: Operator Correspondence

Scan No 2106586 CDPHE CORRESPONDENCE 2A#400378297

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From: Oates, Jason C. <Jason.Oates@encana.com>
Date: Wed, Apr 17, 2013 at 8:10 AM
Subject: CDPHE Form 2A Comment
To: "Greg Deranleau (greg.deranleau@state.co.us)" <greg.deranleau@state.co.us>

Per the CDPHE comments on the Form 2A for Divide Road Water Treatment Facility regarding the Air Pollution Control Division Requirement to complete the air quality permitting process prior to construction commencing, please consider the following information:

The APCD issued the following Construction Permits on December 5, 2012

- 12GA1831 - (2) 6,000 bbl Condensate Storage Tanks
- 12GA1832 - (1) Produced Water Flash Vessel
- 12GA1833 - (1) Combustor
- 12GA1834 - Condensate Truck Loading
- 12GA1835 - Fugitive Emissions
- Four (4) Waukesha 7042 generator engines registered under General Permit GP02.

These permits are issued and valid.

A modification was submitted on March 8th.

With that modification we plan to transfer ownership of the facility to Hunter Ridge Energy Services and make the following changes (**NOTE: Transfer of ownership is an administrative modification not requiring approval prior to construction**):

- 1) We will add 4 new Waukesha 7042 engines under GP02 (**NOTE: These engines can be constructed at any time as the general permit is in affect as soon as we register for it**)
- 2) We will modify permit 12GA1831 to install (4) 400 bbl tanks in place of the (2) 6,000 bbl tanks. This was done because we do not anticipate as much condensate production as originally thought. (**NOTE: This will require an amendment to the construction permit, we will not commence construction of these tanks until the revised permit is obtained. This does not preclude construction of other permitted sources at the facility per APCD regulations.**)
- 3) Construction Permit 12GA1832 for the produced water flash vessel is cancelled in the modification as it will not be installed. The separators that will be installed will be process vessels with no emission points therefore not requiring an air permit. (**NOTE: Does not require approval from CDPHE-APCD**)
- 4) Construction Permit 12GA1833 for the combustor is not being modified other than the transfer of ownership.
- 5) Construction Permit 12GA1834 for condensate loadout is not being modified other than the transfer of ownership.

6) Construction Permit 12GA1835 for fugitive emissions from equipment leaks is being modified to increase emissions to buffer the emission limit for future changes in piping or gas composition.

(NOTE: A valid permit for fugitive emission currently exists and therefore should not delay construction of this facility.)

As summarized in the notes above, the only equipment that does not have a valid construction permit at this time are the new 400 bbl condensate tanks. Those tanks will not be installed until the revised Construction Permit 12GA1831 is received. All other construction activities are acceptable under CDPHE-APCD Regulation Number 3.

Please let me know if have any questions.

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