

STATE OF  
COLORADO

Weems - DNR, Mark &lt;mark.weems@state.co.us&gt;

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## Venting-Flaring Natural Gas

5 messages

**Weems - DNR, Mark** <mark.weems@state.co.us>

Fri, Apr 22, 2016 at 9:54 AM

To: Jennifer Mattox-CDPHE\_APCD &lt;jennifer.mattox@state.co.us&gt;

Cc: CDPHE APCD Oil and Gas-Mark McMillan-Unit Supv &lt;mark.mcmillan@state.co.us&gt;, Stuart Ellsworth - DNR &lt;stuart.ellsworth@state.co.us&gt;

Williford Resources, LLC - Operator #96735

Hearne Williford-President

918-712-8828

[hwilli@swbell.net](mailto:hwilli@swbell.net)

I left you a voicemail earlier today.


We have an operator requesting permission to vent gas at each of their well sites. All wells are located in the Red Mesa Field located about 25 miles SW of Durango. This field is located within the external boundaries of the Southern Ute Indian Tribe (SUIT) Reservation. This includes forty-two (42) wells with approximately 1 MCFD per well or a total of 42 MCFD. Long term plans include a central flare site. All wells sites are located on fee minerals and surface ownership.

I have corresponded with Karen Spray- Oil and Gas Operations Manager SUIT and their Air Quality Program. They state that since this is a minor volume of gas, the EPA will have jurisdiction and will advise the SUIT.

Before approving the request to vent on resource conservation basis and not air quality, I would like to discuss the matter with you.

Mark Weems, P. E.

Regional Engineer - SW Colorado

 co\_dnr\_div\_ogcc\_300\_rgb\_ltrhd\_v3P [970.259.4587](tel:970.259.4587) | F [970.259.0743](tel:970.259.0743) | C [970.749.0624](tel:970.749.0624)

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**Mattox - CDPHE, Jennifer** <jennifer.mattox@state.co.us>

Fri, Apr 22, 2016 at 10:13 AM

To: "Weems - DNR, Mark" &lt;mark.weems@state.co.us&gt;

Cc: CDPHE APCD Oil and Gas-Mark McMillan-Unit Supv &lt;mark.mcmillan@state.co.us&gt;, Stuart Ellsworth - DNR &lt;stuart.ellsworth@state.co.us&gt;, Christopher Laplante - CDPHE &lt;christopher.laplante@state.co.us&gt;

Hi Mark,

Our Stationary Sources database does not list a Williford Energy source in that area, and does not show a plant or facility named Red Mesa. Based on the placement of the facility, and using our Air Quality Colorado map (link provided below), this looks to be within SUIT boundaries. The Division does not have regulatory jurisdiction over facilities located within the Reservation, but thank you for notifying us of their activity and asking Williford to work with their appropriate air quality agency.

Please let me know if I can assist further.

Thanks,  
j

Here is the link to the Colorado map:

[http://www.colorado.gov/airquality/ss\\_map\\_wm.aspx](http://www.colorado.gov/airquality/ss_map_wm.aspx)

And here is link to the pdf for calculating emissions for VOC and HAPs:

[https://www.colorado.gov/pacific/sites/default/files/AP\\_A-Simple-Guide-to-Calculating-Your-VOC-and-HAP.pdf](https://www.colorado.gov/pacific/sites/default/files/AP_A-Simple-Guide-to-Calculating-Your-VOC-and-HAP.pdf)

Jennifer Mattox  
Enforcement Supervisor, Oil & Gas Team  
Stationary Sources Program



P 303.692.3144 | F 303.782.0278

4300 Cherry Creek Drive South, Denver, CO 80246-1530

[jennifer.mattox@state.co.us](mailto:jennifer.mattox@state.co.us) | [www.colorado.gov/cdphe/apcd](http://www.colorado.gov/cdphe/apcd)

4300 Cherry Creek Drive South, Denver, CO 80246-1530

*As of January 1, 2014, the Colorado Air Pollution Control Division no longer accepts blank or incomplete APENs. Additional fees may apply if an APEN is submitted without the necessary information. An application with missing information may result in longer processing times. Please note that all APEN submissions should be completed using forms currently supplied by the Division (See Reg. 3, Part A, Section II.A). Current APEN forms can be found at: <https://www.colorado.gov/cdphe/APENforms>*

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**Stuart Ellsworth - DNR** <[stuart.ellsworth@state.co.us](mailto:stuart.ellsworth@state.co.us)>

Fri, Apr 22, 2016 at 10:15 AM

To: Dave Kulmann <[dave.kulmann@state.co.us](mailto:dave.kulmann@state.co.us)>, Mark Weems - DNR <[mark.weems@state.co.us](mailto:mark.weems@state.co.us)>

Thank You,

Stuart

303-894-2100 x5108

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**From:** Mattox - CDPHE, Jennifer [<mailto:jennifer.mattox@state.co.us>]

**Sent:** Friday, April 22, 2016 10:13 AM

**To:** Weems - DNR, Mark

**Cc:** CDPHE APCD Oil and Gas-Mark McMillan-Unit Supv; Stuart Ellsworth - DNR; Christopher Laplante - CDPHE  
**Subject:** Re: Venting-Flaring Natural Gas

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**Kulmann, Dave** <dave.kulmann@state.co.us>  
To: Stuart Ellsworth - DNR <stuart.ellsworth@state.co.us>  
Cc: Mark Weems - DNR <mark.weems@state.co.us>

Fri, Apr 22, 2016 at 10:19 AM

Perfect. Proceed as we discussed Stuart.

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**Dave Kulmann**  
**Deputy Director -- Field Operations**



**COLORADO**

Oil & Gas Conservation  
Commission

Department of Natural Resources

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**Weems - DNR, Mark** <mark.weems@state.co.us> Fri, Apr 22, 2016 at 12:42 PM  
To: r8eisc@epa.gov, SUIT-Mark Hutson-Air Quality Program-Technical Mgr <mhutson@southernute-nsn.gov>,  
Jennifer Mattox-CDPHE\_APCD <jennifer.mattox@state.co.us>

Refer to email dated 4/22/2016, 9:54 AM from Mark Weems-COGCC Regional Engineer SW CO to Jennifer Mattox-CDPHE-Air Quality Control Re:

**Williford Resources, LLC - Operator #96735**  
**Hearne Williford-President**  
**918-712-8828**  
**[hwilli@swbell.net](mailto:hwilli@swbell.net)**

Request to vent natural gas.

The COGCC will be approving the request on a resource conservation basis and by virtue of this email are notifying you of the authorization. All indications and reports indicate that EPA Region 8 is the authorized regulatory body having jurisdiction for air quality.

Mark Weems, P. E.  
Regional Engineer - SW Colorado

 co\_dnr\_div\_ogcc\_300\_rgb\_ltrhd\_v3

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**Spray, Karen** <kspray@sudoe.us>  
to me, Mark, Steve, david.andrews ▾

📧 7:51 AM (2 hours ago) ☆



Mark and Steve,

Our Air Quality Program (AQP) staff have added some comments to the document you provided. As you are aware the airshed within the exterior boundaries of the Southern Ute Indian Reservation (SUIR) is an air quality control region as defined by an Intergovernmental Agreement between the SUIR and State of Colorado under Public Law 998. As such, all operators are subject to the Tribe's Reservation Air Program regardless of land status. The Title V, large source, program is delegated to and managed by the Tribe. Currently the Tribal Minor New Source Review (TMNSR), minor source, program resides with the EPA but permits are reviewed by our AQP. Based on the estimated flaring rate you provided, the proposed action will not trigger Title V permitting requirements but will require TMNSR authorization from the EPA. We anticipate this process will take at least 6 months to complete and recommend Williford initiate that process as soon as possible if they wish to continue to pursue this action. Construction of a flare without prior TMNSR authorization would be a violation of the Clean Air Act (CAA) and would be treated accordingly. If they choose not to take this route they will need to identify alternate methods of managing their casing gas that does not include venting or flaring.

Thank you for allowing us to review and comment on this proposal. It should help prevent the potential for CAA violations. We also request that you continue to solicit input from the SUIR on any future requests you may have for venting and flaring within the SUIR airshed.

Please feel free to give us a call if you want to discuss this further.

Thanks,

Karen

*Karen L. Spray, PG*

Exploration & Production Manager  
Southern Ute Indian Tribe – Growth Fund  
Department of Energy  
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