

**JONAH & PINEDALE ANTICLINE GAS FIELDS**  
**Additions to Oil and Gas Production Facility Emission Control and**  
**Permitting Requirements**  
**July 28, 2004**

**Introduction**

Intensified production activity, increased concentration of gas/condensate production equipment and consequential air quality impact due to proposed infill drilling and tight well spacing in the Jonah and Pinedale Anticline gas fields warrants revisiting of the current emission control strategy. The emission control requirements and permitting process currently utilized under the Air Quality Division's Notice of Installation (NOI)/Presumptive BACT (P-BACT) permitting process are revised in this guidance to address the increased activity and emission levels. The additional guidance **will not affect existing well site facilities currently operating under Air Quality permit or waiver until the existing well site facilities are modified.** The following revisions to the Air Quality Division's Chapter 6, Section 2 Oil and Gas Production Facilities Permitting Guidance (C6 S2 Guidance) have been approved.

**Affected Production Fields**

This additional guidance applies only to O&G production facilities in the Jonah and Pinedale Anticline Fields described as;

*R109W & R110W in T34N*  
*R109W & R110W in T33N*  
*R108W, R109W & R110W in T32N*  
*R108W, R109W and R110W in T31N*  
*R107W, 108W & 109W in T30N*  
*R107W, R108W & R109W in T29N*  
*R108W & R109W in T28N*  
*R107W, R108 & R109W in T27N*

**This additional guidance became effective upon approval by the Air Quality Advisory Board, July 28, 2004 and applies to all wells with spud dates occurring after the approval date.**

## Control Requirements for Single Well Facilities

- Emission controls meeting BACT requirements described in the C6 S2 Guidance will be required for projected average annual VOC flashing emissions equal to or greater than **30 TPY**. This is a reduction from the current 40-TPY threshold under the P-BACT permitting process.
- If, under the P-BACT permitting process, control is required for flashing emissions, the controls must be installed within **90-days** of the First Date of Production, rather than 120-days, as currently required under the C6 S2 Guidance.
- Controls for flashing emissions installed under the P-BACT permitting process will remain operational for at least one year after the date of installation of the controls. After this time the controls may be removed provided the previous, 30-day, uncontrolled, annualized VOC emission rate is less than **20 TPY**. This is a reduction from the current 30-TPY removal threshold described in the C6 S2 Guidance.
- If projected potential annual VOC or total HAP emissions from dehydration units are equal to or greater than 15 TPY VOCs or **5 TPY total HAPs** and less than major source levels, one of the three control schemes described in the C6 S2 Guidance must be followed. This is a reduction from the current 7 TPY total HAPs threshold. If control schemes (1)<sup>1</sup> or (2)<sup>2</sup> are followed, these tasks must be completed within **90-days** of the First Date of Production. This is a reduction from the current 120-day deadline.

## Application Procedure for Single Well Facilities

- Operators may continue to bring **single** O&G production facilities on line prior to obtaining an Air Quality Permit. The deadlines for submitting NOIs and C6 S2 permit applications described in the current Guidance remain unchanged.

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<sup>1</sup>Install an approved emission control device satisfying the BACT requirements described in the C6 S2 Guidance .

<sup>2</sup>Install a different glycol circulation pump or modify the existing pump in order to physically limit the maximum lean glycol circulation rate.

*For the purposes of this guidance, a PAD or multiple well facility is a location where more than one well and/or associated production equipment are located, where some or all production equipment is shared by more than one well or where wellstreams from more than one well are routed through individual production trains located at the same or contiguous and adjacent location. If production or production equipment associated with one or more wells is added to an existing single well facility, that location is then considered to be a PAD or multiple well facility.*

*For the purposes of this guidance a single well facility becomes a multiple well or PAD facility upon the First Date of Production<sup>3</sup> of an additional well or the day production associated with an additional well or wells from a separate location is routed to the single well facility.*

*An existing multiple well or PAD facility becomes modified and remains a multiple well or PAD facility once production or production equipment associated with another well(s) is added to or tied into the existing facility. The date modification occurs to an existing facility is the First Date of Production associated with a new well or the date production associated within additional well(s) is tied into equipment at the existing facility.*

### **Control Requirements for Multiple Well or PAD Facilities**

- For all multiple well or PAD wellsite production facilities, controls for emissions from all existing and new hydrocarbon liquid storage tanks and pressure vessels (flashing emissions) and existing and new dehydration units, meeting BACT requirements described in the C6 S2 Guidance, are required to be installed and operational upon the First Date of Production of an additional well(s) or upon the date production associated with a well(s) from a separate location is tied into a facility.
- Limiting dehydration unit emissions through limiting lean glycol circulation rates is not an option. All reboiler still vent and glycol flash tank emissions associated with existing and new units must be controlled using the control systems/devices described in the C6 S2 Guidance.
- For all new and existing combustion units used for control of flashing and dehydration unit emissions, pilot flames must be continually monitored using a thermocouple and continuous recording device or any other device(s) which can detect and record the presence of the pilot flames. These monitoring systems must be installed and operational upon start up of the combustion devices.

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<sup>3</sup>First Date of Production is defined in the C6 S2 Guidance

- Controls for flashing emissions will remain operational for at least one year after the date of installation of the controls. After this time, the controls may be removed provided the previous, 30-day, uncontrolled, annualized VOC emission rate is less than **20 TPY**. This is a reduction from the current 30-TPY removal threshold described in the C6 S2 Guidance.

### **Application Procedure for Multiple Well or PAD Facilities**

- For all PAD production facilities, a complete C6 S2 permit application must be filed within **40-days** of the First Date of Production of an additional well producing to or at the PAD and within 40-days of production associated with an additional well(s) being tied into new or existing equipment at the PAD. **The P-BACT/NOI process will no longer apply to these facilities** since installation of controls for all new and all existing flashing and dehydration unit emissions are required to be installed and operational upon the First Date of Production. Uncontrolled and controlled emissions reported in the application shall be based upon actual, average, daily gas and condensate throughput at the time of application filing.
- Permits issued to multiple well or PAD facilities will include permit conditions authorizing installation of new equipment associated with new wells or addition of production associated with separate wells without submittal of a complete C6 S2 permit application. In place of a permit application, a new form will be provided. The form will require identification of new wells/equipment/added production and certification of emission controls and/or emission control installation dates.