

January 6, 1999

**RE: Oil and Gas Production Facilities Section 21 Permitting Guidance (Revision)**

Dear Oil and Gas Producer:

This letter is to advise all oil and gas production operators that the Air Quality Division has revised the Oil and Gas Production Facilities Section 21 Permitting Guidance. This guidance, originally issued in June 1997, was compiled to assist oil and gas production operators with the Wyoming Air Quality Standards and Regulations (WAQSR) Section 21 permitting process which became effective May 1974. Section 21 requires operators of all facilities and/or sources to submit a Section 21 permit application and requires the application of Best Available Control Technology (BACT) to limit source emissions provided it is economically reasonable and technically feasible to do so.

Since issuance of the original guidance document, the Division and Industry have gained experience with the BACT process as it applies to natural gas/condensate production operations. We have worked together to develop the 'Presumptive BACT' process. This process applies to control of volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions associated with flashing losses from pressure vessels and storage tanks at new wells and recompletion or stimulation projects where accurate emission rates typically cannot be determined until production rates are established. Through the 'Presumptive BACT' process VOC and HAP emission thresholds are established and used to determine whether control equipment is required, and, if so, when the equipment must be in place.

Addition of the 'Presumptive BACT' process is a significant revision to the guidance document. Other revisions include:

- C Brief overviews of WAQSR Sections 33 and 36 (recent additions to WAQSR) and the revised Section 9
- C Streamlined application process for sites with minimal emissions
- C Opacity requirements for combustion chambers and flares
- C Reduction in the amount of information required for some wellsite facility permit applications

Over the past several years the Division has attempted to advise all oil and gas producers, including operators, subcontractors, rental equipment suppliers and oil and gas production service companies, that prior to installation of any oil and gas production equipment which has the potential to emit air contaminants into the air of this state, the owner or operator of the equipment must notify the Wyoming Department of Environmental Quality, Air Quality Division to determine permit requirements. While many operators have complied with this requirement, there are those who are either unaware of this or who choose not to comply.

Operators of all new or existing oil and gas production facilities are given until March 1, 1999 to comply with the Oil and Gas Production Facilities Section 21 Permitting Guidance requirements. After that date, failure to notify the Division pursuant to the above can result in enforcement actions and appropriate penalties.

Use of the revised guidance may begin immediately. It may be obtained electronically from the Division's Website or in hard copy upon request.

Download site: <http://deq.state.wy.us/aqd.htm>

Questions regarding this notice should be directed to Cynthia Madison (307) 777-5947 or at the above address.

Sincerely,

Dan Olson  
Administrator  
Air Quality Division