



west virginia department of environmental protection

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Earl Ray Tomblin, Governor
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MEMORANDUM

To: File
From: William T. Rothwell II
Date: March 27, 2015
Subject: Trans Energy, Inc. -- Goshorn 1H-4H Well Pad-- Marshall County, WV
ID #: 051-00214
APP #: PD15-025

BACKGROUND INFORMATION:

Trans Energy, Inc. installed four well heads, four 0.75 MMBTU/hr Gas Processing Units/Field Separators, four 210 barrel storage tanks, and two 400 barrel storage tanks in April, 2012. This process is used to remove most of the water entrained in the gas stream by disturbance of the gas flow inside the separators.

During a telephone conversation on 02/12/2014 and 2/13/2014 with Trans Energy's consultant, Bill Monroe, of Environmental Compression Services, in reference to the Dewhurst well (PD13-084) he stated that the self-priming pumps on the truck can pump 550 gallons per minute (33,000 gal/hr) and could empty one (210 barrel) tank in 30 minutes. The facility empties one tank to one 260 barrel truck four different times throughout the day (morning, noon, evening, and night). The maximum amount that can be unloaded to one truck in one hour is 8,800 gallons (or emptying one tank in 30 minutes). The potential uncontrolled emissions from the truck loading alone would require the applicant to obtain an air permit at 17.77 pounds per hour of VOCs. The uncontrolled emissions from the truck loading, produced water emissions (water flash), two Gas Processing Units, and the total barrel storage (working and breathing emissions) combined are as follows:

<u>Pollutant</u>	<u>LB/HR</u>	<u>TPY</u>
VOCs	17.84	78.15
CO	0.25	1.08
NOx	0.29	1.27
HAPs	0.01	0.01

RECOMMENDATION:

The emission rates are above the emission limits of six (6) lb/hr and ten (10) TPY; 144 pounds per calendar day; 2 lb/hr or 5 TPY of HAPs set forth set forth in 45CSR13 - 2.17.a&b. Therefore, a permit is required by this Division for the installation and operation of the above mentioned well pad.



William T. Rothwell II, P.E.
Engineer

3/27/2015

Date