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Morgantown, WV 26508
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April 4, 2016

Assistant Director for Permitting
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304

RE: Administrative Update (Class I), Permit No.: R13-3190
Potts Wellpad, DAQ Plant ID: 103-00086
New Martinsville, Wetzel County, WV

Dear Assistant Director:

Stone Energy is requesting the removal of the Tradewinds Emergency Generator Engine (50 bhp, natural gas-fired reciprocating engine) (GE-02) from permit R13-3190. It was never installed at this facility.

These are the sections in Permit R13-3190 that reference GE-02 and need to be revised.

- Modify Table in Section 1.0 Emission Units. Delete GE-02.
- Modify Section 8.0. Source-Specific Requirements (Generator Engines, GE-01 and GE-02)
- Delete Sections 8.1.3, 8.1.4, 8.1.5.
- Modify Sections 8.3.1 and 8.3.2 wording to reflect the presence of a single natural gas fired RICE generator.

If additional information is needed, Jennifer Selfridge can provide it for you. She can be contacted at (304) 225-1771 or by email at selfridgeja@stoneenergy.com.

I, the undersigned Responsible Official, hereby certify that all information contained in this notification is true, accurate, and complete based on information and belief formed after reasonable inquiry.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard Toothman".

Richard Toothman
Senior Vice President, Appalachia

Facility Location: Near New Martinsville, Wetzel County, West Virginia
Mailing Address: 1300 Fort Pierpont, Suite 201
Morgantown, WV 26508
Facility Description: Natural Gas and Condensate Production Well Pad
NAICS Codes: 211111
UTM Coordinates: 515.879 km Easting • 4,391.864 km Northing • Zone 17
Permit Type: Construction
Description of Change: This permit is for the following emission units: seven (7) 0.5 mmBtu/hr line heaters, one (1) 210-bbl condensate tank, five (5) produced water tanks, one (1) 104.7-bhp natural gas fired generator engine, ~~and one (1) 50 bhp natural gas fired emergency generator engine.~~

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

The source is not subject to 45CSR30.

Any wells located at this production pad drilled after August 23, 2011 and storage tanks constructed after August 23, 2011 will be affected sources subject to the applicable provisions of 40CFR60 Subpart OOOO, signed on April 17, 2012.

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1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
HTR-1	1e	Line Heater	2012	0.50 MMBTU/hr	None
HTR-2	2e	Line Heater	2012	0.50 MMBTU/hr	None
HTR-3	3e	Line Heater	2012	0.50 MMBTU/hr	None
HTR-4	4e	Line Heater	2012	0.50 MMBTU/hr	None
HTR-5	5e	Line Heater	2012	0.50 MMBTU/hr	None
HTR-6	6e	Line Heater	2012	0.50 MMBTU/hr	None
HTR-7	7e	Line Heater	2012	0.50 MMBTU/hr	None
T01	8e	Condensate Tank	2012	210 bbl	None
T02	9e	Produced Water Tank	2012	210 bbl	None
T03	10e	Produced Water Tank	2012	210 bbl	None
T04	11e	Produced Water Tank	2012	210 bbl	None
T05	12e	Produced Water Tank	2012	210 bbl	None
T06	13e	Produced Water Tank	2012	210 bbl	None
GE-01	14e	Prime Generator Engine	2012	104.7 bhp	NSCR
GE-02	15e	Emergency Generator Engine	2012	50 bhp	None
TL-01	16e	Truck Loading	2012	4,000 gal/year	None

1.1. Control Devices

Emission Unit	Pollutant	Control Device	Control Efficiency
GE-01 Prime Generator Engine	Nitrogen Oxides	Non Selective Catalytic Reduction (NSCR)	90 %
	Carbon Monoxide		90 %
	Volatile Organic Compounds		90 %

8.0. Source-Specific Requirements (Generator Engines, GE-01 and GE-02)

8.1. Limitations and Standards

- 8.1.1. Natural Gas Consumption Prime Generator Engine. To help demonstrate compliance with Section 8.1.2., the quantity of natural gas that shall be consumed in the 104.7 bhp natural gas fired reciprocating engine, PSI Prime Generator Engine shall not exceed 744 cubic feet per hour and 6.52×10^6 cubic feet per year for each engine.
- 8.1.2. Maximum emissions from the 104.7 bhp natural gas fired reciprocating engine, PSI prime generator engine (14e) shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Nitrogen Oxides	0.02	0.06
Carbon Monoxide	0.09	0.37
Volatile Organic Compounds	0.02	0.06
Formaldehyde	0.02	0.07

~~8.1.3. Natural Gas Consumption Emergency Generator Engine. To help demonstrate compliance with Section 8.1.4., the quantity of natural gas that shall be consumed in the 50 bhp natural gas fired reciprocating engine, Tradewinds Emergency Generator Engine shall not exceed 440 cubic feet per hour and 3.85×10^6 cubic feet per year.~~

~~8.1.4. Maximum emissions from the 50 bhp natural gas fired reciprocating engine, Tradewinds emergency generator engine (15e) shall not exceed the following limits:~~

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Nitrogen Oxides	0.59	0.15
Carbon Monoxide	2.41	0.61
Volatile Organic Compounds	0.59	0.15
Formaldehyde	0.01	0.01

~~8.1.5. Hour Limitation for Emergency Generator Engine. The maximum number of hours per year for emergency generator engine GE-02 shall not exceed 500 hours per year using a twelve month running total. A twelve month rolling total shall mean the sum of the hours at any given time during the previous twelve consecutive calendar months.~~

8.1.6. Requirements for Use of Catalytic Reduction Devices

- a. Rich-burn natural gas compressor engine (GE-01) equipped with non-selective catalytic reduction (NSCR) air pollution control devices shall be fitted with a closed-loop, automatic air/fuel ratio controller to ensure emissions of regulated pollutants do not exceed the potential to emit for any engine/NSCR combination under varying load. The closed-loop, automatic air/fuel ratio controller shall control a fuel metering valve to ensure a fuel-rich mixture and a resultant exhaust oxygen content of less than or equal to 0.5%.
- b. For natural gas generator engine (GE-01), the permittee shall monitor the temperature to the inlet of the catalyst and in accordance with manufacturer's specifications, a high temperature alarm shall shut off the engine before thermal deactivation of the catalyst occurs. If the engine shuts off due to high temperature, the permittee shall also check for thermal deactivation of the catalyst before normal operations are resumed.

- c. The permittee shall follow the written operation and maintenance plan submitted with Permit Application R13-3190, which details the periodic and annual maintenance requirements.
- d. Upon request by the Director, testing shall be conducted using a portable analyzer in accordance with a protocol approved by the Director. Such controls shall ensure proper and efficient operation of the engine and air pollution control devices.

8.2. Monitoring Requirements

8.2.1. Catalytic Oxidizer Control Devices

- a. The permittee shall regularly inspect, properly maintain and/or replace catalytic reduction devices and auxiliary air pollution control devices to ensure functional and effective operation of the engine's physical and operational design. The permittee shall ensure proper operation, maintenance and performance of catalytic reduction devices and auxiliary air pollution control devices by:
 1. Maintaining proper operation of the automatic air/fuel ratio controller or automatic feedback controller.
 2. Following a written operating and maintenance plan.

8.3. Recordkeeping Requirements

- 8.3.1. To demonstrate compliance with sections 8.1.-8.2., the permittee shall maintain records of the amount of natural gas consumed in ~~each~~ engine and the hours of operation of ~~each~~ engine. Said records shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.
- 8.3.2. To demonstrate compliance with section 8.1.6., the permittee shall maintain records of the maintenance performed on ~~each~~ engine. Said records shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.