

12/17/15

To: File
From: John Legg
Date: December 17, 2015

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Subject: G35-A008B - Class I Administrative Update
EXCO Resources (PA), LLC
Green Hills Compressor Station
Ravenswood, Jackson County, WV

Administrative update G35-A008B is being withdrawn by EXCO. What follows is an explanation for the withdraw.

On August 24, 2015, the DAQ received a class I administrative update (G35-A008B) from EXCO Resources (PA), LLC (EXCO). The update was to correct an alleged typographical error with Emission Unit ID CE-1 (670 bhp Caterpillar C3508LE compressor engine):

General Permit G35-A008A had the engine (CE-1) being manufactured in the year 2008 and being subject to 40 CFR 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The update (G35-A008B) stated that the engine was really manufactured in March of 2007 and was not subject to Subpart JJJJ.

The writer went back to the previous engineering evaluation (G35-A008A) and found the following passage:

The writer spoke to EXCO's consultant Dave Fewell (ERM) on 11/21/12. Dave confirmed that the dehy was made by Exterran. The re-boiler was made by Hanover. The new Caterpillar G3508LE motor was manufactured in 2008 (not 3/2007 as given in the application).

On November 17, 2015, the writer e-mailed Grant Morgan, EXCO's consultant, and stated that the last page (engine specification sheet) of the G35-A008B application which was sent to the DAQ to prove that the CE-1 engine was manufactured on 03/07/2007 was not for that engine. It was for a 633bhp Caterpillar G3208TALE compressor engine- the old/previous engine that was permitted under G35-A008 and was to have been replaced under G35-A008A by the 670 bhp Caterpillar C3508LE compressor engine.

The writer further stated in the November 17, 2015 e-mail: If you can send me a page (engine specification sheet) showing an engine manufactured date of 2007 for the current engine (670 bhp Caterpillar G3508LE), the writer would grant your request.

On December 4, 2015, in an e-mail, EXCO's consultant Grant Morgan wrote: We (EXCO) have found that the 670 bhp Caterpillar G3508LE engine that was included in a permit update (G35-A008A) was not installed at this facility after the capital expenditure project was cancelled due to market conditions.

To summarize what happened: The replacement engine (670 bhp Caterpillar G3508LE) was never installed under G35-A008A and since it wasn't installed, the most recent request (G35-A008B) for a correction to the replacement engine (that was never installed) was a mistake, i.e., since the replacement engine was never installed (G35-A008A), EXCO needed to go back to general permit registration G35-A008 to be in compliance. These are the reasons why G35-A008B was withdrawn by EXCO.