west virginia department of environmental protection

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# MEMORANDUM

**To:** Beverly McKeone
**From:** Jonathan Carney
**Date:** December 19, 2016
**Subject:** Noble Energy, Inc.-Moundsville 9 Natural Gas Production facility, Marshall County, WV
**ID #:** 051-00233
**APP #:** PD16-064

## BACKGROUND INFORMATION:

Noble energy is an oil and natural gas production facility. The well pad consists of 6 natural gas wells, six (6) sand separators, six (6) gas production units and associated heaters, 4-400 bbl Produced Water Storage Tanks and a produced water truck loadout.

Noble estimates that the potential and actual emissions from the facility will not exceed the WV 45 CSR13 permitting thresholds. The emissions estimates for the facility are as follows:

| Pollutant | lbs/hr | tpy | lb/day |
|---|---|---|---|
| PM | 0.04 | 0.16 | 0.90 |
| PM10 | 0.04 | 0.16 | 0.90 |
| VOCs | 3.50 | 15.31 | 83.88 |
| CO | 0.42 | 1.82 | 9.97 |
| $NO_x$ | 0.50 | 2.17 | 11.90 |
| HAPs | 0.28 | 1.12 | 6.63 |

## RECOMMENDATION:

The facility is not subject to any substantive requirements.

The emissions from the pneumatic controllers were retrofitted June 2, 2016 with low bleed relays that reduced the pneumatic control bleed rates to less than 6 scfh. This is below the standard in 40 CFR 63 Subpart OOOOa and excludes these pneumatic controllers from being affected facilities.

The produced water storage tanks do not have a potential to exceed six (6) tons per year of volatile organic compounds (VOCs) and are not affected facilities as defined in 40 CFR 63 Subpart OOOO.

The emissions calculations provided in the application show that the facility does not have the potential to discharge more than six (6) pounds per hour and ten (10) tons per year or 144 pounds per calendar day, of any regulated air pollutant. The emissions calculations provided in the application show that the facilility does not have the potential to discharge more than two (2) pounds per hour or five (5) tons per year of hazardous air pollutants. The application also shows that the facility does not have the potential to discharge any air pollutant(s) listed in Table 45-13A of 45 CSR 13 in the amounts shown in Table 45-13A or greater.

A permit is not required by this Division for this facility.

Jonathan Carney, P.E.
Engineer

December 19, 2016
Date