west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone (304) 926-0475 • FAX: (304) 926-0479

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	G70-A014A
Plant ID No.:	103-00081
Applicant:	EQT Production Company (EQT)
Facility Name:	PNG-129 Pad
Location:	Pine Grove, Wetzel County
NAICS Code:	211111
Application Type:	Modification
Received Date:	December 31, 2015
Engineer Assigned:	Jerry Williams, P.E.
Fee Amount:	$500.00
Date Received:	January 13, 2016
Complete Date:	February 5, 2016
Due Date:	March 21, 2016
Applicant Ad Date:	January 13, 2016
Newspaper:	*Wetzel Chronicle*
UTM's:	Easting: 530.87 km Northing: 4,378.14 km Zone: 17
Latitude/Longitude:	39.552397/-80.64074
Description:	This permitting action is for the installation and operation of two (2) combustors, two (2) thermoelectric generator units, and two (2) sand separator tanks.

DESCRIPTION OF PROCESS

The following process description was taken from Registration Application G70-A014A:

The PNG-129 Pad is a natural gas production facility. The pad consists of 13 natural gas wells. Natural gas and liquids (including water and condensate) are extracted from deposits underneath the surface. Natural gas will be transported from the well to a gas line for additional processing and compression, as necessary. The liquids produced are stored in storage vessels.

The PNG-129 Pad currently consists of the following equipment:

- Fourteen (14) 400 barrel (bbl) storage tanks for condensate/water. The storage tanks are controlled by one of two combustors (each rated at 11.66 MMBtu/hr),

- One (1) line heater rated at 1.54 MMBtu/hr per well (total of 13 line heaters for the pad),
- Two (2) thermoelectric generators (TEG) for the well pad, and
- Loading operations that are vapor balanced and routed to the combustors.

This application requests authorization to install the following:

- Two (2) additional combustors (each rated at 18.75 MMBtu/hr), which will control the existing tanks and loading operations,
- Two (2) additional TEG units, and
- Two (2) 140-bbl sand separator tanks.

The project involves the installation of two (2) new combustors (C003 and C004), two (2) new thermoelectric generators (S030 and S031), and two (2) new storage tanks (S032 and S033) at an existing natural gas production well pad (PNG-129).

The PNG-129 wellpad consists of thirteen (13) wells, each with the same basic operation. The incoming gas/liquid/solid stream from the underground wells passes through a sand separator, where sand, water, and residual solids are displaced and transferred to sand separator tanks (S032 and S033). The remnant gas/liquid stream from the then passes through a line heater (S015-S027) to raise/maintain temperature. The stream will then pass through a separator, which will separate gas (natural gas) from liquids (condensate and produced water). The liquid stream exiting the separator will be transferred to storage vessels (S001-S014). Emissions from the storage vessels are controlled by enclosed combustors (C001-C004). Once the tanks are filled, the contents are loaded into trucks for transport. EQT utilizes vapor balancing in the truck loading operations, which means the vapors displaced by the filling of tanker trucks are routed back into the battery of tanks and ultimately to the combustor. Facility electricity is provided by thermoelectric generators (S028-S031).

SITE INSPECTION

A site inspection was conducted by James Robertson of DAQ Enforcement on June 16, 2015. During that inspection, violations were detected using a FLIR camera. A Notice of Violation (NOV) was issued to EQT on September 15, 2015. EQT responded to this NOV on October 14, 2015 with proposed corrective actions. This remains an open Enforcement action. The closest residence is approximately 2,500 feet from the site.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this modification application consist of the emissions from two (2) combustors which control the existing tanks and loading operations, two (2) thermoelectric generator units, and two (2) sand separator tanks. EQT utilized a gas analysis from May 2015 from this pad to determine VOC and HAP flash emissions.

Each piece of equipment onsite are fitted with components such as flanges, valves, connectors, open-ended lines, and pressure relief valves to ensure a safe and efficient production process. These components are designed to have a small amount of gas vent to the atmosphere. The component counts were estimated.

The following table indicates which methodology was used in the emissions determination:

Emission Unit ID#	Process Equipment	Calculation Methodology
S001-S014	Fourteen (14) 400 bbl Produced Fluids Storage Tanks	ProMax Emission Estimate
S015-S027	Fourteen (14) 1.54 MMBTU/hr Line Heaters	EPA AP-42 Emission Factors
S028-S031	Four (4) Thermoelectric Generators	EPA AP-42 Emission Factors
S032, S033	Two (2) 140 bbl Sand Separator Storage Tanks	E&P TANK 2.0 Emission Estimate
S034	20,128,248 gal/yr Produced Fluid Truck Loading	EPA AP-42 Emission Factors
C001, C002	Two (2) 11.66 MMBTU/hr Combustors	EPA AP-42 Emission Factors
C003, C004	Two (2) 18.75 MMBTU/hr Combustors	EPA AP-42 Emission Factors
FUG	Component Leaks	USEPA Protocol for Equipment Leak Emission Estimates
HR	Unpaved Haulroads	EPA AP-42 Emission Factors

The following table indicates the control device efficiencies that are required for this facility:

Emission Unit	Pollutant	Control Device	Control Efficiency
S001-S014 (Produced Fluids Tanks), S034 (Produced Fluids Truck Loading)	Volatile Organic Compounds	Combustors (C001 – C004)	98 %
	Total HAPs		98 %

The total facility PTE for the PNG-129 Pad is shown in the following table:

Pollutant	Maximum Pre-Modification Annual Facility Wide Emissions (tons/year)	Maximum Post-Modification Annual Facility Wide Emissions (tons/year)	Net Facility Wide Emissions Changes (tons/year)
Nitrogen Oxides	18.08	34.95	16.87
Carbon Monoxide	15.19	29.36	14.17
Volatile Organic Compounds	43.68	71.04	27.36
Particulate Matter-10/2.5	1.37	14.68	13.31
Sulfur Dioxide	0.11	0.21	0.10
Total HAPs	1.22	3.42	2.20
Carbon Dioxide Equivalent	24,122	43,359	19,237

Maximum detailed controlled point source emissions were calculated by EQT and checked for accuracy by the writer and are summarized in the table on the next page.

EQT Production Company – PNG-129 Pad (G70-A014A)

Emission	Source	NO_x		CO		VOC		PM-10		SO_2		Total HAPs		CO2e
Point ID#		lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	ton/year
C001	Combustor (Tanks/Loading)	1.15	5.02	0.96	4.22	1.66	5.85	0.09	0.38	0.01	0.03	0.11	0.39	6023
C002	Combustor (Tanks/Loading)	1.15	5.02	0.96	4.22	1.66	5.85	0.09	0.38	0.01	0.03	0.11	0.39	6023
C003	Combustor (Tanks/Loading)	1.89	8.28	1.59	6.95	1.66	5.85	0.14	0.63	0.01	0.05	0.11	0.39	9912
C004	Combustor (Tanks/Loading)	1.89	8.28	1.59	6.95	1.66	5.85	0.14	0.63	0.01	0.05	0.11	0.39	9912
E015-E027	Line Heaters	1.95	8.32	1.56	7.02	0.12	0.52	0.15	0.65	0.01	0.05	0.04	0.16	10260
E028-E031	Thermoelectric Generators	0.02	0.09	0.02	0.07	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	27
E032	Sand Separator Storage Tank	-	-	-	-	0.05	0.21	-	-	-	-	<0.01	0.01	5
E033	Sand Separator Storage Tank	-	-	-	-	0.05	0.21	-	-	-	-	<0.01	0.01	5
LL	Uncaptured Liquid Loading	-	-	-	-	29.80	7.75	-	-	-	-	1.67	0.43	1194
Total Point Source		**7.98**	**34.95**	**6.70**	**29.36**	**36.66**	**32.06**	**0.61**	**2.65**	**0.05**	**0.21**	**2.15**	**2.20**	**43359**
Fugitive	Fugitive Venting	-	-	-	-	NA	38.98	-	-	-	-		1.22	LL
HR	Haulroad Emissions	-	-	-	-	-	-	NA	12.03	-	-	-	-	-
Total Fugitive		**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**38.98**	**0.00**	**12.03**	**0.00**	**0.00**	**0.00**	**1.22**	**0**
Total Sitewide		**7.98**	**34.95**	**6.70**	**29.36**	**36.66**	**71.04**	**0.61**	**14.68**	**0.05**	**0.21**	**2.15**	**3.42**	**43359**

REGULATORY APPLICABILITY

The following rules apply to the facility:

45CSR2 (Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers)

The purpose of 45CSR2 (Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers) is to establish emission limitations for smoke and particulate matter which are discharged from fuel burning units.

45CSR2 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 4 (weight emission standard), 5 (control of fugitive particulate matter), 6 (registration), 8 (testing, monitoring, recordkeeping, reporting) and 9 (startups, shutdowns, malfunctions). However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

The individual heat input of all of the proposed fuel burning units (E015-E031) are below 10 MMBTU/hr. Therefore, these units are exempt from the aforementioned sections of 45CSR2. However, EQT would be subject to the opacity requirements in 45CSR2, which is 10% opacity based on a six minute block average.

45CSR6 (To Prevent and Control Air Pollution from the Combustion of Refuse)

45CSR6 prohibits open burning, establishes emission limitations for particulate matter, and establishes opacity requirements. Sources subject to 45CSR6 include completion combustion devices, enclosed combustion devices, and flares.

The facility-wide requirements of the general permit include the open burning limitations §§45-6-3.1 and 3.2.

All completion combustion devices, enclosed combustion devices, and flares are subject to the particulate matter weight emission standard set forth in §45-6-4.1; the opacity requirements in §§45-6-4-3 and 4-4; the visible emission standard in §45-6-4.5; the odor standard in §45-6-4.6; and the testing standard in §§45-6-7.1 and 7.2. Sections 5.0, 6.0 and 14.0 of the G70-A general permit include requirements for 45CSR6.

Enclosed combustion control devices and flares that are used to comply with emission standards of NSPS, Subpart OOOO are subject to design, operational, performance, recordkeeping and reporting requirements of the NSPS regulation that meet or exceed the requirements of 45CSR6.

EQT has four (4) combustors at the PNG-129 Pad. The combustors have minimal particulate matter emissions. Therefore, the facility's combustors should demonstrate compliance with this section. The facility will demonstrate compliance by maintaining records of the amount of natural gas consumed by the combustors and the hours of operation. The facility will also monitor the flame of the combustors and record any malfunctions that may cause no flame to be present during operation.

45CSR10 (To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides)

45CSR10 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 3 (weight emission standard), 6 (registration), 7 (permits), and 8 (testing, monitoring, recordkeeping, reporting). However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

The individual heat input of all of the proposed fuel burning units (E015-E031) are below 10 MMBTU/hr. Therefore, these units are exempt from the aforementioned sections of 45CSR10.

45CSR13 (Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation)

45CSR13 applies to this source due to the fact that EQT is defined as a "stationary source" under 45CSR13 Section 2.24.b, which states that an owner or operator discharges or has the potential to discharge more than six (6) pounds per hour and ten (10) tons per year, or has the potential to discharge more than 144 pounds per calendar day of any regulated air pollutant. EQT's volatile organic compounds (VOC) emissions exceed 45CSR13 modification permit thresholds. Additionally, the proposed combustors are subject to a substantive requirement under 45CSR6. EQT has published the required Class I legal advertisement notifying the public of their permit application, and paid the appropriate application fee (construction).

45CSR22 (Air Quality Management Fee Program)

This facility is a minor source and not subject to 45CSR30. EQT is required to keep their Certificate to Operate current.

40CFR60 Subpart OOOO (Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution)

EPA published in the Federal Register new source performance standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. 40CFR60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO_2) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The following affected sources which commence construction, modification or reconstruction after August 23, 2011 are subject to the applicable provisions of this subpart:

a. Each gas well affected facility, which is a single natural gas well.

The gas wells at the PNG-129 Pad were drilled principally for the production of natural gas and were done so after August 23, 2011. Therefore, these wells would be considered affected facilities under this subpart. The compliance date for these hydraulically fractured wells is October 15, 2012. EQT is required

under §60.5410 to submit an initial notification, initial annual report, maintain a log of records for each well completion, and maintain records of location and method of compliance. §60.5420 requires EQT demonstrate continuous compliance by submitting reports and maintaining records for each completion operation.

b. Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your centrifugal compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

There are no centrifugal compressors at the PNG-129 Pad. Therefore, all requirements regarding centrifugal compressors under 40 CFR 60 Subpart OOOO would not apply.

c. Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your reciprocating compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

There are no reciprocating compressors at the PNG-129 Pad. Therefore, all requirements regarding reciprocating compressors under 40 CFR 60 Subpart OOOO would not apply.

d. Pneumatic Controllers

- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh which commenced construction after August 23, 2011, and is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not located at a natural gas processing plant.

- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller which commenced construction after August 23, 2011, and is located at a natural gas processing plant.

The pneumatic controllers located at the PNG-129 Pad are required to meet this rule.

e. Each storage vessel affected facility, which is a single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment.

40CFR60 Subpart OOOO defines a storage vessel as a unit that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of liquids or other materials. The following are not considered storage vessels:

- Vessels that are skid-mounted or permanently attached to something that is mobile (such as trucks, railcars, barges or ships), and are intended to be located at a site for less than 180 consecutive days. If the source does not keep or are not able to produce records, as required by §60.5420(c)(5)(iv), showing that the vessel has been located at a site for less than 180 consecutive days, the vessel described herein is considered to be a storage vessel since the original vessel was first located at the site.

- Process vessels such as surge control vessels, bottoms receivers or knockout vessels.

- Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere.

This rule requires that the permittee determine the VOC emission rate for each storage vessel affected facility utilizing a generally accepted model or calculation methodology within 30 days of startup, and minimize emissions to the extent practicable during the 30 day period using good engineering practices. For each storage vessel affected facility that emits more than 6 tpy of VOC, the permittee must reduce VOC emissions by 95% or greater within 60 days of startup. The compliance date for applicable storage vessels is October 15, 2013.

The storage vessels located at the PNG-129 Pad are controlled by a combustor and emit less than 6 tpy of VOC. Therefore, EQT is not required by this section to further reduce VOC emissions by 95%.

f. The group of all equipment, except compressors, within a process unit is an affected facility.

- Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart.

- Equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system, or liquefied natural gas unit is covered by §§60.5400, 60.5401, 60.5402,

60.5421 and 60.5422 of this subpart if it is located at an onshore natural gas processing plant. Equipment not located at the onshore natural gas processing plant site is exempt from the provisions of §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart.

- The equipment within a process unit of an affected facility located at onshore natural gas processing plants and described in paragraph (f) of this section are exempt from this subpart if they are subject to and controlled according to subparts VVa, GGG or GGGa of this part.

The PNG-129 Pad is not a natural gas processing plant. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants would not apply.

g. Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.

- Each sweetening unit that processes natural gas is an affected facility; and

- Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.

- Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H_2S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423(c) but are not required to comply with §§60.5405 through 60.5407 and paragraphs 60.5410(g) and 60.5415(g) of this subpart.

- Sweetening facilities producing acid gas that is completely reinjected into oil-or-gas-bearing geologic strata or that is otherwise not released to the atmosphere are not subject to §§60.5405 through 60.5407, 60.5410(g), 60.5415(g), and 60.5423 of this subpart.

There are no sweetening units at the PNG-129 Pad. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO would not apply.

The following rules do not apply to the facility:

40CFR60 Subpart Kb (Standards of Performance for VOC Liquid Storage Vessels)

40CFR60 Subpart Kb does not apply to storage vessels with a capacity less than 75 cubic meters. The largest tanks that EQT has proposed to install are 63.59 cubic meters each. Therefore, EQT would not be subject to this rule.

40CFR60 Subpart KKK (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants)

40CFR60 Subpart KKK applies to onshore natural gas processing plants that commenced construction after January 20, 1984, and on or Before August 23, 2011. The PNG-129 Pad was constructed after August 23, 2011 and is not a natural gas processing plant, therefore, EQT would not be subject to this rule.

40CFR63 Subpart HH (National Emission Standards for Hazardous Air Pollutants for Oil and Natural Gas Production Facilities)

Subpart HH establishes national emission limitations and operating limitations for HAPs emitted from oil and natural gas production facilities located at major and area sources of HAP emissions. There are no glycol dehydration units at this facility, therefore, this rule does not apply.

45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants)

45CSR19 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment)

The PNG-129 Pad is located in Wetzel County which is an unclassified county for all criteria pollutants, therefore it is not applicable to 45CSR19.

As shown in the table below, EQT is not subject to 45CSR14 or 45CSR19 review. According to 45CSR14 Section 2.43.e, fugitive emissions are not included in the major source determination because it is not listed as one of the source categories in Table 1. Therefore, the fugitive emissions are not included in the PTE below.

Pollutant	**PSD (45CSR14) Threshold (tpy)**	**NANSR (45CSR19) Threshold (tpy)**	**PNG-129 Pad PTE (tpy)**	**45CSR14 or 45CSR19 Review Required?**
Carbon Monoxide	250	NA	29.36	No
Nitrogen Oxides	250	100	34.95	No
Sulfur Dioxide	250	100	0.21	No
Particulate Matter 2.5	250	100	2.65	No
Ozone (VOC)	250	NA	32.06	No

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

The majority of non-criteria regulated pollutants fall under the definition of HAPs which, with some revision since, were 188 compounds identified under Section 112(b) of the Clean Air Act (CAA) as pollutants or groups of pollutants that EPA knows or suspects may cause cancer or other serious human health effects. The following table lists common HAP's emitted from these types of facilities and each HAP's carcinogenic risk (as based on analysis provided in the Integrated Risk Information System (IRIS)):

HAPs	Type	Known/Suspected Carcinogen	Classification
Formaldehyde	VOC	Yes	Category B1 - Probable Human Carcinogen
Benzene	VOC	Yes	Category A - Known Human Carcinogen
Ethylbenzene	VOC	No	Inadequate Data
Toluene	VOC	No	Inadequate Data
Xylenes	VOC	No	Inadequate Data

All HAPs have other non-carcinogenic chronic and acute effects. These adverse health effects may be associated with a wide range of ambient concentrations and exposure times and are influenced by source-specific characteristics such as emission rates and local meteorological conditions. Health impacts are also dependent on multiple factors that affect variability in humans such as genetics, age, health status (e.g., the presence of pre-existing disease) and lifestyle. As stated previously, *there are no federal or state ambient air quality standards for these specific chemicals*. For a complete discussion of the known health effects of each compound refer to the IRIS database located at *www.epa.gov/iris*.

AIR QUALITY IMPACT ANALYSIS

Modeling was not required of this source due to the fact that the facility is not subject to 45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants) as seen in the table listed in the Regulatory Discussion Section.

SOURCE AGGREGATION

"Building, structure, facility, or installation" is defined as all the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous and adjacent properties, and are under the control of the same person.

1. The PNG-129 Pad will operate under SIC code 1311 (Crude Petroleum and Natural Gas Extraction). There are surrounding facilities operated by EQT that share the same two-digit major SIC code of 13 for oil and gas exploration and production. Therefore, the PNG-129 Pad does share the same SIC code as the surrounding facilities.

2. "Contiguous or Adjacent" determinations are made on a case by case basis. These determinations are proximity based, and it is important to focus on this and whether or not it meets the common sense notion of a plant. The terms "contiguous" or "adjacent" are not defined by USEPA. Contiguous has a dictionary definition of being in actual contact; touching along a boundary or at a point. Adjacent has a dictionary definition of not distant; nearby; having a common endpoint or border.

   There are no EQT facilities that are contiguous or adjacent with the PNG-129 Pad. Additionally, there are no co-located facilities with the PNG-129 Pad.

3. There are other wells and compressor stations that are under common control of EQT.

Because the facilities are not considered to be on contiguous or adjacent properties, the emissions from the PNG-129 Pad should not be aggregated with other facilities in determining major source or PSD status.

MONITORING OF OPERATIONS

EQT will be required to perform the following monitoring and recordkeeping associated with this permit application:

- Monitor and record quantity of natural gas consumed for all combustion sources
- Monitor the presence of the combustor pilot flame with a thermocouple or equivalent
- Monitor opacity from all fuel burning units
- Monitor the throughput to the storage tanks and loadout
- Monitor all applicable requirements of 40CFR60 Subpart OOOO
- Monitor and record the operating hours of the combustor
- Maintain records of testing conducted in accordance with the permit
- Maintain a record of all potential to emit (PTE) HAP calculations for the entire facility. These records shall include the natural gas compressor engines and ancillary equipment.
- Monitor the condensate and produced water truck loading
- The records shall be maintained on site or in a readily available off-site location maintained by EQT for a period of five (5) years.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates EQT's PNG-129 Pad meets all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that the Wetzel County location should be granted registration under General Permit G70-A.

Jerry Williams, P.E.
Engineer

FEB 17, 2016
Date