

To: File  
From: John Legg  
Date: July 15, 2015

*John Legg*  
*7/15/15*

Subj: G70-A112A - Class 1 Administrative Update  
EQT Production Company  
OXF-157 Site, West Union, Doddridge County, WV  
Plant ID No.: 017-00139  
General Permit Registration No.: G70-A112A

On June 15, 2015 the West Virginia Division of Air Quality (WVDAQ) received at Class I Administrative Update from EQT Production Company. The proposed change was discussed in G70-A112A Update, in Attachment C, entitled "Process Description" and is as follows:

This Class I Administrative Update reflects a proposed change in the configuration of line heaters at the OXF-157 natural gas production site. In the Class II General Permit (G70-A112) currently filed with the WVDAQ, EQT Production Company filed for the authority to operate ten (10) line heaters each with a heat input rating of 1.0 MM Btu/hr. The proposed change would alter this configuration to two (2) line heaters each with a heat input rating of 4.5 MM Btu/hr and one (1) line heater with a heat input rating of 1.00 MM Btu/hr. The potential-to-emit will not be affected by these changes.

EQT will also reduce the number of natural gas wells from ten (10) to seven (7) at the OXF 157 Site.

There are no other proposed changes to the process as permitted in registration G70-A112.

The writer had no problem making the line heater configuration change as described above. The second requested change: to reduce the number of wells from 10 to 7, required addition input from EQT's Alex Bosiljevac, i.e., there were only 6 wells listed in the G60-A112 registration, instead of the anticipated 10 as described above. Alex Bosiljevac explained what had happened in a 7/15/15 email to the writer:

I think I figured it out. I took a look at the application for the current permit, and it looks like there were 4 additional wells anticipated to be drilled. However, these did not make it into the registration pages. So that's why we were asking to reduce from 10 wells down to 7 wells. Currently we have plans to come back to drill one last well at this pad. So we would like the registration pages to have one additional well for a total of 7 wells. We do not have an API number for this well yet so could you please list it as TBD.

The writer added "TBD" to the revised registration to make 7 wells to be drilled at the OXF 157 Site.

Attached to this evaluation is a compare file showing the changes made to General Permit Registration G70-A112 to incorporate the above describe changes.

COMPARE FILE

*West Virginia Department of Environmental Protection  
Division of Air Quality*

*Earl Ray Tomblin  
Governor*

*Randy C. Huffman  
Cabinet Secretary*

**Class II General Permit  
G70-A Registration to ~~Construct~~Update**



for the  
Prevention and Control of Air Pollution in regard to the  
Construction, Modification, Relocation, Administrative Update and  
Operation of Oil and Natural Gas Production Facilities  
Located at the Well Site

*The permittee identified at the facility listed below is authorized to  
construct the stationary sources of air pollutants identified herein in accordance  
with all terms and conditions of General Permit G70-A.*

**G70-~~A112~~A112A**

Issued to:

**EQT Production Company**

**OXF-157 Pad**

**017-00139**

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*William F. Durham  
Director*

Issued: July 15, 2015

COMPARE FILE

This Class I Administrative Update, G70-A112A, supersedes and replaces G70-A112 issued  
January 12, 2014 — *Effective: January 12, 2014*

Facility Location: West Union, Doddridge County, West Virginia  
Mailing Address: 625 Liberty Avenue, Suite 1700, Pittsburgh, PA 15222  
Facility Description: Natural Gas Production Well Pad  
NAICS Code: 211111  
SIC Code: 1311  
UTM Coordinates: 520.160 km Easting • 4,343.000 km Northing • Zone 17  
Longitude Coordinates: -80.76635  
Latitude Coordinates: 39.23609  
Directions to Facility: While travelling Route 50 West at the town of West Union turn left onto WV-18. Travel for about 2 miles and turn left onto Maxwell Ridge (Route 13). Continue for over 2.5 miles and make sharp turn onto Oil Well Road. Follow Oil Well Road for 0.6 miles and turn left at the fork. Then travel for 0.2 miles and make a sharp left (next left available.) After ¼ mile make a left. Continue for 0.5 miles and facility will be on the right.

Registration Type: Construction Class I Administrative Update  
Description of Change: Construction of a natural gas well pad consisting of eleven storage tanks, ten Forma  
Alter previous line heater configuration to: 2 line heaters, two thermoelectric generators, two vapor combustors each with a heat input rating of 4.5 MM Btu/hr and truck-loading 1 line heater with a heat input rating of 1.00 MM Btu/hr. The number of natural gas wells is also reduced to 7 at the OXF 157 Site.

Subject to 40CFR60, Subpart OOOO? Yes

Subject to 40CFR60, Subpart JJJJ? No

Subject to 40CFR63, Subpart ZZZZ? No

Subject to 40CFR63, Subpart HH? No

*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 or registration 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.*

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*The source is not subject to 45CSR30.*

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**Permit Section Applicability for the Registrant**

*All registered facilities under General Permit G70-A are subject to Sections 1.0, 2.0, 3.0, and 4.0 of General Permit G70-A.*

The following additional sections of General Permit G70-A apply to the registrant:

Section 5	Natural Gas Well Affected Facility	<input checked="" type="checkbox"/>
Section 6	Storage Vessels*	<input checked="" type="checkbox"/>
Section 7	Gas Production Units, In-Line Heaters, Heater Treaters, and Glycol Dehydration Reboilers	<input checked="" type="checkbox"/>
Section 8	Pneumatic Controllers Affected Facility (NSPS, Subpart OOOO)	<input type="checkbox"/>
Section 9	<i>Reserved</i>	<input type="checkbox"/>
Section 10	Natural Gas-Fired Compressor Engine (s) (RICE)**	<input type="checkbox"/>
Section 11	Tank Truck Loading Facility***	<input checked="" type="checkbox"/>
Section 12	Standards of Performance for Storage Vessel Affected Facilities (NSPS, Subpart OOOO)	<input type="checkbox"/>
Section 13	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (NSPS, Subpart JJJJ)	<input type="checkbox"/>
Section 14	Control Devices not subject to NSPS, Subpart OOOO	<input checked="" type="checkbox"/>
Section 15	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40CFR63, Subpart ZZZZ)	<input type="checkbox"/>
Section 16	Glycol Dehydration Units	<input type="checkbox"/>
Section 17	Dehydration Units With Exemption from NESHAP Standard, Subpart HH § 63.764(d) (40CFR63, Subpart HH)	<input type="checkbox"/>
Section 18	Dehydration Units Subject to NESHAP Standard, Subpart HH and Not Located Within an UA/UC (40CFR63, Subpart HH)	<input type="checkbox"/>
Section 19	Dehydration Units Subject to NESHAP Standard, Subpart HH and Located Within an UA/UC (40CFR63, Subpart HH)	<input type="checkbox"/>

- \* The registrant may also be subject to the applicable control device requirements of Section 12 if the registrant is subject to the NSPS, Subpart OOOO control requirements or may be subject to the control device requirements of Section 14.
- \*\* The registrant may also be subject to the applicable RICE requirements of Section 13 and/or Section 15.
- \*\*\* The registrant may also be subject to the applicable control device requirements of Section 14.

**1.0 Emission Units Table**

Emission Unit ID	Emission Point ID	Emission Unit Description (Mfg., Model, Serial No., Engine type 2SLB, 4SLB, 4SRB, etc.)	Control Device ID	Year Installed / Modified	Max. Design Capacity	Design Capacity Unit of Measure	G70-A Applicable Sections
S001- <del>S010</del> S002	E001- <del>E010</del> E002	( <del>10</del> 2) Line Heaters	None	<del>2014</del> 2015	<del>1.04.5</del> each	MMBtu/hr	7
S003	E003	(1) Line Heater	None	2015	1.0	MM Btu/hr	7
S011- S020	E011- E020	(10) Condensate Storage Tanks	C021- C022	2014	400	Bbl	6 & 14
S023	E023	Truck Loading	C021- C022	2014	11,026,260	Gal/year	11
S024- S025	E024- E025	Thermoelectric Generators	None	2014	0.13	MMBtu/hr	7
S026	E026	(1) Sand Trap Blowdown Tank	C021- C022	2014	140	Bbl	6 & 14
Control Devices (If applicable)							
Control Device ID	Control Efficiency %	Control Device Description (Mfg, Model)	Year Installed / Modified	Max. Design Capacity	Design Capacity Unit of Measure	G-70A Applicable Sections	
C021 & C022	98	(2) LEED Fabrication Enclosed Combustor 48"	2014	11.66	MMBtu/hr	14	
Emission Reduction Systems						Yes or No	G-70A Applicable Sections
Was a vapor recovery system (VRU) used to determine emission limits?						No	
Was a low pressure tower(s) used to determine emission limits?						No	

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Forma

Forma

### 2.0 Oil and Natural Gas Wells Table

API number	API number	API number
047-017-06458	047-017-06463	
047-017-06459	To Be Determined (TBD)	
047-017-06460		
047-017-06461		
047-017-06462		

### 3.0 Emission Limitations

Emission Unit ID	Emission Point ID	Emission Unit Description	Regulated Pollutant	Maximum Potential Emissions	
				Hourly (lb/hr)	Annual (tpy)
S001- <del>S010</del> S002	E001-E010	<del>(10) 1.02</del> 4.5 MMBtu/hr Line Htrs	Nitrogen Oxides	<del>1.000</del> 90	<del>4.303.8</del> 7
			Carbon Monoxide	<del>0.8972</del>	<del>3.6024</del>
S003	E003	(1) 1.0 MMBtu/hr Line Htr	Nitrogen Oxides	0.10	0.43
			Carbon Monoxide	0.08	0.36
S011-S020 S026, C021 C022	E011-E020, E026, C021 C022	(10) Cond. & BD Tanks and (2) Encl. Combustor	Volatile Organic Compounds	2.28	10.00
			Total HAPs	0.09	0.41
			Nitrogen Oxides	2.30	10.04
			Carbon Monoxide	1.92	8.44
S027	E027	Truck Loading	Volatile Organic Compounds	0.04	0.18
			Total HAPs	--	--

### 4.0 Throughput Limitations

Throughput limits are on a 12-month rolling total basis.

Emission Unit ID	Emission Point ID	Emission Unit Description	Annual Throughput Limit
S027	E027	Truck Loading	11,026,260 gal/yr

### 5.0 Reciprocating Internal Combustion Engines (R.I.C.E.) Information

Emission Unit ID	Engine Manufacturing Date	Subject to 40CFR60, Subpart JJJJ?	Subject to 40CFR63, Subpart ZZZZ?	Subject to Sections 10.1.4 / 10.2.1 (Catalytic Reduction Device)
N/A	N/A	N/A	N/A	N/A