west virginia department of environmental protection

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MEMORANDUM

To: Bev McKeone, NSR Program Manager

From: Caraline Griffith, Permit Engineer

Date: March 29, 2016

Subject: Class I Administrative Update, R13-2958D, SWN Production Company, LLC

On March 22, 2016 the DAQ received an administrative update request for SWN Production Company, LLC to make changes to Permit R13-2958C. Attached to this memo is the letter of approval and updated Permit R13-2958D, along with the suggested changes.

It is being requested that the Caterpillar G3306 NA flash gas compressor engine (EU-ENG1) located at the John Harwatt well pad be removed based on the basis that the flash gas emissions produced by the heater treaters can be routed directly through the vapor combustor. The one (1) Heater Treater (EU-HT2) and the Low Pressure Tower (LPT) will also be removed. Based on 45CSR13 "Class I Administrative Updates" are limited to changes including the permanent removal of equipment, not including air pollution control equipment. Therefore, a Class I Administrative Update is needed and it is recommended for approval.

The emissions will decrease as follows:

Pollutant	R13-2958C (TPY)	R13-2958D (TPY)	Change in PTE (TPY)
NOx	9.28	7.58	-1.71
CO	14.95	11.89	-3.06
VOC	38.96	33.39	-5.57
PM	6.48	1.56	-4.92
Formaldehyde	0.09	0.00	-0.09
Total HAPs	3.20	2.48	-0.72