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**west virginia department of environmental protection**

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**M E M O R A N D U M**

To: Bev McKeone, NSR Program Manager

From: Caraline Griffith, Permit Engineer

Date: March 1, 2016

Subject: Class I Administrative Update, R13-2976C, SWN Production Company, LLC

On February 25, 2016 the DAQ received an administrative update request for SWN Production Company, LLC to make changes to Permit R13-2976B. Attached to this memo is the letter of approval and updated Permit R13-2976C, along with the suggested changes.

It is being requested that the two (2) Caterpillar G3306 NA compressor engines (EU-MC4172 and EU-ENG2) located at the Mark Owen well pad be removed based on the basis that the flash gas emissions produced by the heater treaters can be routed directly through the produced water and condensate tanks to the combustor. 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    | R13-2976B<br>(TPY) | R13-2976C<br>(TPY) | Change in PTE<br>(TPY) |
|--------------|--------------------|--------------------|------------------------|
| NOx          | 17.90              | 15.09              | -2.80                  |
| CO           | 32.22              | 26.61              | -5.61                  |
| VOC          | 30.23              | 18.08              | -12.15                 |
| PM           | 8.91               | 2.04               | -6.88                  |
| Formaldehyde | 0.18               | 0.00               | -0.18                  |
| Total HAPs   | 4.15               | 1.37               | -2.78                  |