



**west virginia** department of environmental protection

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**ENGINEERING EVALUATION / FACT SHEET**

BACKGROUND INFORMATION

Application No.: R13-3116  
Plant ID No.: 091-00041  
Applicant: E2 Energy Services, LLC (E2)  
Facility Name: Curry Well Pad Station  
Location: Bridgeport, Taylor County  
SIC Code: 1311  
NAICS Code: 211111  
Application Type: Construction  
Received Date: August 28, 2013  
Engineer Assigned: Jerry Williams, P.E.  
Fee Amount: \$4,500  
Date Received: August 28, 2013  
Complete Date: September 30, 2013  
Due Date: December 29, 2013  
Applicant Ad Date: September 7, 2013  
Newspaper: *The Exponent Telegram*  
UTM's: Easting: 574.028 km      Northing: 4,356.124 km      Zone: 17  
Description: Installation and operation of a new natural gas compressor station.

DESCRIPTION OF PROCESS

The following process description was taken from Permit Application R13-3116:

Wells at the Curry Well Pad have seen the well head pressure drop significantly since the start of operations. While this has been expected, it is now necessary to add compression so as to allow gas to be discharged into local gathering lines. E2 proposes to install and operate compression and dehydration equipment on land contiguous to the well pad. Additional wells at this well pad and/or others may also be added to the flow to this station in the near future. Accordingly, emission estimates are based upon the maximum flow the equipment at this facility can manage.

Natural gas and produced water will be received from wells on the Curry Well Pad and potentially other wells located in the general vicinity of this facility. The raw gas will be received at approximately 500 psi. The gas will then pass through a separator where gas and



ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this construction application consist of the combustion emissions from two (2) natural gas fired compressor engines (1E, 2E), two (2) TEG dehydrator still vents (3E, 4E), two TEG dehydrator reboilers (5E, 6E), two (2) line heaters (7E), two (2) produced water storage tanks (8E, 9E), and fugitive piping and blowdown emissions. Fugitive emissions for the facility are based on calculation methodologies presented in the Texas Natural Resource Conservation Commission (TNRCC) for use in the oil and gas production industry. The following table indicates which methodology was used in the emissions determination:

Emission Point ID#	Process Equipment	Calculation Methodology
1E	1,340 hp Caterpillar G3516 LE Reciprocating Internal Combustion Engine (RICE) w/ SCR	Manufacturer's Data, EPA AP-42 Emission Factors
2E	630 hp Caterpillar G3508 LE RICE w/ SCR	Manufacturer's Data, EPA AP-42 Emission Factors
3E, 4E	17.0 mmscfd TEG Dehydrator Still Vent (Recycled Emissions to Reboiler)	GRI-GlyCalc 4.0
5E, 6E	0.50 MMBtu/hr TEG Dehydrator Reboiler	EPA AP-42 Emission Factors
7E	Two (2) 0.50 MMBTU/hr Line Heaters	EPA AP-42 Emission Factors
8E, 9E	400 bbl Produced Water Storage Tanks	ProMax Emission Estimation Software
FUG	Process Piping Fugitive Emissions	TNRCC
BD	Blowdown Emissions	Emission Estimates

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

Emission Unit	Pollutant	Control Device	Control Efficiency
1,340 hp Caterpillar G3516 LE RICE w/ SCR (1E)	Carbon Monoxide	SCR	93 %
	Volatile Organic Compounds		48 %
	Formaldehyde		95.1 %
630 hp Caterpillar G3516 LE RICE w/ SCR (2E)	Carbon Monoxide	SCR	93 %
	Volatile Organic Compounds		64.3 %
	Formaldehyde		98 %

The total facility PTE for the Curry Well Pad Station is shown in the following table:

Pollutant	Facility Wide PTE (tons/year)
Nitrogen Oxides	38.98
Carbon Monoxide	3.06
Volatile Organic Compounds	3.79
Particulate Matter-10	0.72
Sulfur Dioxide	0.04
Formaldehyde	0.20
Total Hazardous Air Pollutants	0.67
Carbon Dioxide Equivalents	11,985

Maximum detailed controlled point source emissions were calculated by E2 and checked for accuracy by the writer and are summarized in the table on the next page.

## E2 Energy Services, LLC – Curry Well Pad Station (R13-3116)

Emission Point ID#	Source	NO <sub>x</sub>		CO		VOC		PM10		SO <sub>2</sub>		Formaldehyde		Total HAPs		CO <sub>2</sub> e	
		lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year
1E	Compressor Engine #1	5.91	25.88	0.36	1.59	0.61	2.69	0.09	0.43	<0.01	0.03	0.04	0.16	0.11	0.47	1654	7246
2E	Compressor Engine #2	2.78	12.17	0.16	0.68	0.15	0.68	0.05	0.21	<0.01	0.01	<0.01	0.04	0.05	0.19	822	3598
3E	Dehydrator Still Vent #1	0	0	0	0	0.04	0.18	0	0	0	0	0	0	<0.01	<0.01	0	0
4E	Dehydrator Still Vent #2	0	0	0	0	0.04	0.18	0	0	0	0	0	0	<0.01	<0.01	0	0
5E	Dehydrator Reboiler #1	0.05	0.22	0.05	0.19	<0.01	0.02	<0.01	0.02	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	60	262
6E	Dehydrator Reboiler #2	0.05	0.22	0.05	0.19	<0.01	0.02	<0.01	0.02	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	60	262
7E	Line Heaters	0.11	0.49	0.1	0.41	<0.01	0.03	<0.01	0.04	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	134	585
8E, 9E	Produced Water Tanks	0	0	0	0	<0.01	<0.01	0	0	0	0	0	0	<0.01	<0.01	7	29
FUG	Process Piping Fugitives	0	0	0	0	<0.01	0.03	0	0	0	0	0	0	<0.01	0.01	0	0
BD	Blowdown Emissions	0	0	0	0	<0.01	<0.01	0	0	0	0	0	0	<0.01	<0.01	1	3
<b>Total</b>	<b>Total Facility PTE</b>	<b>8.90</b>	<b>38.98</b>	<b>0.72</b>	<b>3.06</b>	<b>0.87</b>	<b>3.79</b>	<b>0.16</b>	<b>0.72</b>	<b>0.01</b>	<b>0.04</b>	<b>0.04</b>	<b>0.20</b>	<b>0.16</b>	<b>0.67</b>	<b>2738</b>	<b>11985</b>

## 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 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 the proposed reboilers (3E, 4E) and the line heaters (7E) are below 10 MMBTU/hr. Therefore, these units are exempt from the aforementioned sections of 45CSR2.

E2 would also be subject to the opacity requirements in 45CSR2, which is 10% opacity based on a six minute block average.

### **45CSR4** (To Prevent and Control the Discharge of Air Pollutants into the Open Air which Causes or Contributes to an Objectionable Odor or Odors)

45CSR4 states that an objectionable odor is an odor that is deemed objectionable when in the opinion of a duly authorized representative of the Air Pollution Control Commission (Division of Air Quality), based upon their investigations and complaints, such odor is objectionable. No odors have been deemed objectionable.

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

The purpose of 45CSR10 is to establish emission limitations for sulfur dioxide which are discharged from fuel burning units. 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 the proposed reboilers (3E, 4E) and the line heaters (7E) 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 E2 exceeds the regulatory emission threshold for criteria pollutants of 6 lb/hr and 10 ton/year for NO<sub>x</sub>, and they are also subject to a substantive requirement of an emission control rule promulgated by the Secretary (40CFR60 Subpart OOOO, 40CFR63 Subparts HH and ZZZZ).

E2 paid the appropriate application fee and published the required legal advertisement for a construction permit application.

**45CSR16** (Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60)

45CSR16 applies to this source by reference of 40CFR60, Subpart OOOO. These requirements are discussed under that rule below.

**45CSR22** (Air Quality Management Fee Program)

E2 is not subject to 45CSR30. The Curry Well Pad Station is subject to 40CFR60 Subpart OOOO, however they are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided they are not required to obtain a permit for a reason other than their status as an area source.

E2 is required to pay the appropriate annual fees and 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<sub>2</sub>) 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.

*There are no gas wells at this facility. Therefore, all requirements regarding gas well affected facilities under 40 CFR 60 Subpart OOOO would not apply.*

- 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 Curry Well Pad Station. 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 reciprocating internal combustion engines located at the Curry Well Pad Station. However, they were constructed before the August 23, 2011 applicability date and operated at another location prior to August 23, 2011. Relocation to another facility does not constitute a modification. Therefore, the 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.

*There will be applicable pneumatic controllers at this facility. Therefore, the requirements regarding pneumatic controllers under 40 CFR 60 Subpart OOOO would apply. E2 would be required to perform the following:*

- *Each pneumatic controller located between the wellhead and a natural gas processing plant must have a bleed rate less than or equal to 6 standard cubic feet per hour (scfh).*
- *Each pneumatic controller must be tagged with the month and year of installation, reconstruction, or modification, and identification information that allows traceability to the records for that controller.*

- *Submit the appropriate start up notifications.*
  - *Submit the applicable annual reports for pneumatic controllers.*
  - *Maintain records of the date, location and manufacturer specifications for each pneumatic controller, records of the demonstration that the used of pneumatic controllers with a natural gas bleed rate greater than 6 scfh are required and the reasons why, records of the manufacturer's specifications indicating that the controller is designed such that the natural gas bleed rate is less than or equal to 6 scfh, records of deviations in cases where the pneumatic controllers was not operated in compliance.*
- 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 Curry Well Pad Station have a potential to emit of less than 6 tpy of VOC. Therefore, E2 is not required by this section to 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 Curry Well Pad Station 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<sub>2</sub>S) 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 Curry Well Pad Station. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO would not apply.*

**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. The glycol dehydration unit at the Curry Well Pad Station is subject to the area source requirements for glycol dehydration units. However, because the facility is an area source of HAP emissions and the actual average benzene emissions from the glycol dehydration unit is below 0.90 megagram per year (1.0 tons/year) it is exempt from all requirements of Subpart HH except to maintain records of actual average flowrate of natural gas to demonstrate a continuous exemption status.

The following rules do not apply to the facility:

**45CSR30** (Requirements for Operating Permits)

E2 is not subject to 45CSR30. The Curry Well Pad Station is a minor source of emissions. The facility is subject to 40CFR60 Subpart OOOO, however they are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided they are not required to obtain a permit for a reason other than their status as an area source.

**40CFR60 Subpart Dc** (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units)

This rule applies to steam generating units with a heat input capacity of 100 MMBTU/hr or less, but greater than or equal to 10 MMBTU/hr for which construction commenced after June 9, 1989. E2 does not have an applicable unit, therefore, E2 would not be subject to this rule.

**40CFR60 Subpart Kb** (Standards of Performance for Volatile Organic Liquid Storage Vessels)

40CFR60 Subpart Kb does not apply to storage vessels with a capacity less than 75 cubic meters. The largest tanks that E2 has proposed to install are 63.59 cubic meters each. Therefore, E2 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 Curry Well Pad Station is not a natural gas processing facility, therefore, E2 is not subject to this rule.

**40CFR60 Subpart JJJJ** (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SI ICE))

40CFR60 Subpart JJJJ establishes emission standards for applicable SI ICE.

The proposed engines (1E, 2E) were manufactured prior to the applicability date, therefore these engines (1E, 2E) are not subject to this rule.

**40CFR63 Subpart ZZZZ** (National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines)

Subpart ZZZZ establishes national emission limitations and operating limitations for HAPs emitted from stationary RICE located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. The engines (1E, 2E) at the Curry Well Pad Station are subject to the area source requirements for non-emergency spark ignition engines.

The applicability requirements for a new stationary RICE located at an area source of HAPs, is the requirement to meet the standards of 40CFR60 Subpart JJJJ. In a October 19, 2010 memo from Melanie King of the USEPA Office of Air Quality Planning and Standards Energy Strategies Group, Ms. King states that there are some engines that fall into a window where they would not have any requirements under either 40CFR60 Subpart JJJJ or 40CFR63 Subpart ZZZZ. These engines fall under that category, in the fact that they are “new” under 40CFR63 Subpart ZZZZ, however, do not meet the applicability criteria for 40CFR60 Subpart JJJJ.

**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 Curry Well Pad Station is located in Taylor County, whose attainment status is unclassified. Because Taylor County is not classified as a non-attainment county, 45CSR19 does not apply to this facility.

As shown in the following table, E2 is not subject to 45CSR14 or 45CSR19 review.

<b>Pollutant</b>	<b>PSD (45CSR14) Threshold (tpy)</b>	<b>NANSR (45CSR19) Threshold (tpy)</b>	<b>Curry Well Pad PTE (tpy)</b>	<b>45CSR14 or 45CSR19 Review Required?</b>
Carbon Monoxide	250	NA	3.06	No
Nitrogen Oxides	250	NA	38.98	No
Sulfur Dioxide	250	NA	0.04	No
Particulate Matter 10	250	NA	0.72	No
Ozone (VOC)	250	NA	3.79	No
Greenhouse Gas	100,000	NA	11,985	No

## TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

There will be small amounts of various non-criteria regulated pollutants emitted from the combustion of natural gas. However, due to the concentrations emitted, detailed toxicological information is not included in this evaluation.

## 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) or 45CSR19 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment) as seen in the table listed in the Regulatory Discussion section under 45CSR14/45CSR19.

## SOURCE AGGREGATION DETERMINATION

“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 Curry Well Pad Station will operate under SIC code 1311 (Crude Petroleum and Natural Gas). The upstream Triana Energy gas production wells will operate under SIC code 1311 (Crude Petroleum and Natural Gas). Therefore, both share the same two-digit major SIC code of 13. Therefore, the two (2) entities do belong to the same industrial grouping.
2. The Triana Energy well pad the Curry Well Pad Station are owned and operated by independent corporate entities. E2 has no ownership stake in any production well that may send natural gas to the Curry Well Pad Station. E2 has no operational control over any equipment owned or operated by any natural gas producer upstream of the Curry Well Pad Station. All employees at the Curry Well Pad Station are under the exclusive direction of E2 and have no reporting authority to any other entity. In addition, no work forces are shared between the two (2) companies. The heaters and water tanks at the existing Triana site will become part of E2’s Curry Well Pad Station with the issuance of this permit.
3. The Curry Well Pad Station is located on contiguous property with the Triana well pad. There are no other E2 facilities that are located on contiguous or adjacent properties with the Curry Well Pad Station.

The Curry Well Pad Station and Triana wells share the same industrial grouping. However, the two (2) facilities are not under common control. Therefore, the emissions from these two (2) facilities should not be aggregated in determining major source or PSD status. As noted above, the heaters and water tanks at the existing Triana site will become part of E2’s Curry Well Pad Station with the issuance of this permit.

## MONITORING OF OPERATIONS

E2 will be required to perform the following monitoring and recordkeeping:

- Monitor and record quantity of natural gas consumed and hours of operation for all combustion sources.
- Maintain records of testing conducted in accordance with the permit. Said records shall be maintained on-site or in a readily accessible off-site location
- Maintain the corresponding records specified by the on-going monitoring requirements of and testing requirements of the permit.
- Maintain records of the visible emission opacity tests conducted per 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 engine and ancillary equipment.
- Maintain records of all applicable requirements of 40CFR60 Subpart OOOO.
- The records shall be maintained on site or in a readily available off-site location maintained by E2 for a period of five (5) years.

## RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that E2 meets all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that the Curry Well Pad Station should be granted a 45CSR13 construction permit for their facility.

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Jerry Williams, P.E.  
Engineer

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Date