

Bryan W. Shaw, Ph.D., *Chairman*
Carlos Rubinstein, *Commissioner*
Toby Baker, *Commissioner*
Zak Covar, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

June 11, 2012

Dear Survey Recipient:

Re: Request for Calendar Year 2011 Pneumatic Device Data

As part of ongoing efforts to improve the area source oil and gas emissions inventory, the Texas Commission on Environmental Quality (TCEQ) is requesting data associated with pneumatic devices operating at active gas well sites outside of the 23-county Barnett Shale area. (Please note that for the purposes of this survey, the Barnett Shale area is composed of the following counties: Archer, Bosque, Clay, Comanche, Cooke, Coryell, Dallas, Denton, Eastland, Ellis, Erath, Hill, Hood, Jack, Johnson, Montague, Palo Pinto, Parker, Shackelford, Somervell, Stephens, Tarrant, and Wise.)

The TCEQ is specifically requesting county-level information regarding the total component count of the following three types of pneumatic devices active and present on site as of December 31, 2011: liquid level controllers; pressure controllers; and others (positioners, transducers, etc.). The TCEQ is also requesting operators to further categorize these pneumatic device types as high, low, or intermittent bleed rate devices. Although actual component counts are preferred, engineering estimates are sufficient, contingent on the fact that they be based on best available data.

Only active gas and oil/gas wells that are involved in the production of gas for sale are being considered in this undertaking. Any well where the instrument gas used to actuate the pneumatic devices present on site is the same natural gas that is being produced from the well is applicable to this study. Please note that site-specific information is not requested as a part of this effort.

This data will be used to evaluate volatile organic compounds (VOC) emissions estimates from pneumatic devices on the county-level. Currently, emissions from pneumatic devices are estimated at the county-level using the method detailed in the Eastern Research Group, Inc. report "Characterization of Oil and Gas Production Equipment and Develop a Methodology to Estimate Statewide Emissions." The current values are based upon limited data and improved pneumatic device information is needed to more accurately estimate emissions from these devices.

Participation in this survey is not required; however, the importance of an accurate and timely response cannot be over-emphasized. By identifying and characterizing the number of pneumatic devices present at active gas well sites statewide, the TCEQ will be better able to accurately represent and evaluate VOC emissions associated with these devices.

The Excel® spreadsheet survey form and instructions are available at the following TCEQ Web page: <http://www.tceq.texas.gov/airquality/areasource/ASEI.html>. If you have difficulty

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downloading the survey materials from the TCEQ Web page, please contact the TCEQ at the enclosed telephone number(s) and/or e-mail address(es) as soon as possible.

Please download, complete, and certify the Excel® spreadsheet; print, sign, and scan the certification (“Signature of Legally Responsible Party”); and remit as attachments via e-mail to miles.whitten@tceq.texas.gov within 45 (total, not business) days from the date of this letter. Submitting the survey electronically will greatly streamline and facilitate TCEQ’s data analysis undertakings and is truly appreciated. Please include any other data that you believe will be useful to characterize these devices.

If you prefer to remit the signed certification and/or survey form via traditional mail, please use the following address:

USPS	Overnight Service
Miles T Whitten	Miles T Whitten
Texas Commission on Environmental Quality	Texas Commission on Environmental Quality
P.O. Box 13087, MC 167	12100 Park 35 Circle, MC 167
Austin, TX 78711-3087	Austin, TX 78753

For questions about the information requested, please contact Miles T Whitten at (512) 239–5479 or miles.whitten@tceq.texas.gov, Ellen Hoyer at (512) 239-1468 or ellen.hoyer@tceq.texas.gov, or Julie Westphal at (512) 239-5705 or julie.westphal@tceq.texas.gov.

Thank you for your continued responsiveness to efforts on behalf of the TCEQ to refine emissions inventories.

Sincerely,



David Brymer, Director
Air Quality Division

DB/MTW/rs