

From: [Susan Jablonski](#)
To: [REDACTED]
Cc: [OCE](#); [Ramiro Garcia](#); [Clarise Ashworth](#); [Eric Dean](#); [Vanessa Stewart](#); [Mark Harmon \(Austin\)](#); [Michelle Harris](#); [David Van Soest](#); [Lori Wilson](#); [Jason Neumann](#)
Subject: RE: Request for Enforcement Discretion Response - Chesapeake Energy Corporation in the Brazos Valley
Date: Wednesday, June 17, 2020 2:25:51 PM
Attachments: [BV Sites Requiring Enforcement Discretion - 6.2020.xlsx](#)

Ms. Deirdre Shepherd
Manager – Air Compliance
Chesapeake Energy Corporation
Oklahoma City, Oklahoma

Dear Ms. Shepherd:

This is in response to your request received on June 12, 2020, for enforcement discretion regarding the quarterly and/or semiannual optical gas imaging inspections required by Title 40, Code of Federal Regulations (CFR), §60.5397a(a), the Air Quality Standard Permit for Oil and Gas Handling and Production Facilities, and NSPS OOOOa regulation. An additional facility list, as attached, was also provided as a follow-up to the original request on June 15, 2020. The Texas Commission on Environmental Quality (TCEQ) is exercising enforcement discretion on a case-by-case basis for regulated entities that are experiencing impacts due to the COVID-19 pandemic.

We understand that due to the on-going local and statewide COVID-19 response restrictions, Chesapeake Energy will not be able to meet optical gas imaging inspection requirements for the attached list of facilities located in Bastrop, Brazos, Burleson, Lee, Milam, Robertson, and Washington Counties. Specifically, this shortfall is due to staffing impacts to shelter-in-place guidelines, interstate travel restrictions, and Centers for Disease Control and Prevention guidelines which were in place during a significant portion of the second quarter of 2020. Specifically, optical gas imaging operators were unable to travel from Chesapeake offices in Oklahoma and Louisiana to the listed facilities in Texas. The reductions in inspections and the impacts you outlined in your request are issues the TCEQ has considered when granting enforcement discretion. Due to the limited availability of travel and protection of staff, your request for discretion is approved.

The TCEQ will exercise enforcement discretion for the 2nd Quarter period ending June 2020, regarding the requirements found in 40 CFR §60.5397a(a), the Air Quality Standard Permit for Oil and Gas Handling and Production Facilities, and NSPS OOOOa regulation. Please maintain all appropriate records and report these shortfalls as deviations for any Title V facilities. If you continue to experience conditions from COVID-19 which restrict your ability to conduct optical gas imaging inspection requirements for the 3rd Quarter of 2020, please submit an additional request for enforcement discretion.

This enforcement discretion is limited to the TCEQ. It does not limit EPA's ability to enforce federal regulations.

If you have any questions on this response, please feel free to contact Jason Neumann, Air Section Manager for TCEQ Waco Region 9 at jason.neumann@tceq.texas.gov or at (254) 761-3033.

Sincerely,

Susan Jablonski, P.E.
Area Director for Central Texas
Texas Commission on Environmental Quality
(512) 239-6731

From: Deirdre Shepherd <[REDACTED]>
Sent: Friday, June 12, 2020 11:23 AM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: Clarise Ashworth <[REDACTED]> Eric Dean <[REDACTED]>
Vanessa Stewart <[REDACTED]> Mark Harmon (Austin)
<[REDACTED]>
Subject: Request for Enforcement Discretion due to Covid-19

Classification: DCL-Internal

Mr. Garcia,

Chesapeake Energy is requesting enforcement discretion for 197 facilities. These facilities require quarterly and/or semiannual optical gas imaging inspections under the Air Quality Standard Permit for Oil and Gas Handling and Production Facilities and NSPS OOOOa regulation. Inspections utilizing optical gas imaging are conducted using a FLIR camera operated by an individual trained and certified by the manufacturer. FLIR camera operators travel to the area from Chesapeake offices in Oklahoma and Louisiana. Interstate travel restrictions due to Covid-19 have impacted our ability to conduct inspections.

This request affects facilities in the following counties:

- Bastrop
- Brazos
- Burleson
- Lee
- Milam
- Robertson
- Washington

Anticipated Duration:

Shelter-in-place guidelines and interstate travel restriction were in place during a significant portion of the second quarter of 2020. In addition, Chesapeake is following CDC and other guidelines thus prohibiting all business travel except in critical circumstances. These conditions restrict our ability to conduct inspections. We plan to resume inspections in the third quarter, but will assess to ensure the safety of our employees.

Rule/Permit Provisions:

Air Quality Standard Permit for Oil and Gas Handling Production Facilities (e)6(A)

40 CFR §60.5397a(a)

Thank you for your consideration and please let us know if you require any additional information.

Thank you,

Deirdre Shepherd

Manager – Air Compliance

Chesapeake Energy Corporation

Office: 405-935-1133

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[Chesapeake logo](#)



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Facility Name	Facility PN	County	RN
A B CHILDERS 3H PAD	954000	BURLESON	RN110183845
ABBOTT 100 1H PAD	954005	BURLESON	RN109830638
ABBOTT 100 2H PAD	954004	BURLESON	Recently co-located with Abbott 100 1H and RN 109830638 (RN110956653 old)
ALTIMORE-JACKSON PAD	954018	BURLESON	RN109984864
ANGONIA-FAZZINO UNIT 2 PAD	954025	BRAZOS	RN110956570
ASCARI 1H PAD	954034	BURLESON	RN110113594
ASTIN FORBIN PAD	954035	ROBERTSON	RN110453917
BAGGETT-MADELINE PAD	954038	WASHINGTON	RN110638293
BALCAR 1 PAD	954039	LEE	RN110365079
BARTEK EF PAD	954041	BURLESON	RN110434610
BARWISE PAD	954047	ROBERTSON	RN110796034
BATISTA 1H PAD	954050	BURLESON	RN110677218
BCMT A 1H PAD	954051	BURLESON	RN110069689
BELL A-TATUM B PAD	954055	BURLESON	RN110544285
BELL B 1H PAD	954056	BURLESON	RN110749223
BELMONT-KENTUCKY PAD	954057	BURLESON	RN109832972
BENNETT B PAD	954061	BURLESON	RN109950063
BERAN A PAD	955099	BURLESON	RN110874054
BERAN B PAD	954487	BURLESON	RN110874047
BIEBERSTEIN-DISMUKES PAD	954069	LEE	RN110491644
BIG BEND PAD	954071	WASHINGTON	RN110781366
BLAZEK-MCKINEY UNIT 1 PAD	954076	BURLESON	RN110961364
BOXER A PAD	955125	BURLESON	RN110961349
BOXWOOD HACKBERRY PAD	954083	BURLESON	RN109683680
BRAVENEC 1H PAD	954084	BURLESON	RN110069705
BRODNAX-MORGAN PAD	954094	WASHINGTON	RN110443538
BROESCHE B PAD	955119	BURLESON	RN110922168
BROLLIER AC 1H PAD	954096	WASHINGTON	RN110443546
BROOKS C PAD	954099	BURLESON	RN110720505
BROWN 1H - E PAD	954104	BURLESON	RN110791126
BUHRFEIND PAD	954110	BURLESON	RN110596806
CALVIN B 1H PAD	954115	BURLESON	RN110961448
CANDACE 1H PAD	954119	BURLESON	RN109832717
CASEY 1H PAD	954125	BRAZOS	RN110959350
CHURCHWELL 120 2 PAD	954138	BURLESON	RN110846243
COLLEGE STATION A PAD	955093	BRAZOS	RN110922143
COOKS PT C1H PAD	954144	BURLESON	RN110766540
COOPER PAD	954145	BURLESON	RN109831198
CORBIN KRETZER REFRIGERATION P	955133	BURLESON	RN110963675
CORBIN-KRETZER EF UNIT PAD	954147	BURLESON	RN110113701
COTROPIA-MCCRADY 1 PAD	954151	ROBERTSON	RN110963733
COWEN B UNIT PAD	954160	BURLESON	RN110183860
CROOK PAD	954162	BURLESON	RN109905265
CUMMINGS PAD	954164	BURLESON	RN110596798
CWC MINERALS 128 1 PAD	954166	BURLESON	RN110192945
DALMORE PAD	954169	BURLESON	RN110069713
DANIELLE-HUDSON PAD	954172	BURLESON	RN110911179
DELAMATER-WALSH PAD	954182	BURLESON	RN110289667
DELLEY-RUFFINO UNIT 2 PAD	954181	ROBERTSON	RN110963956
DOSS-SNIDER EF UNIT PAD	954193	BURLESON	RN110113883
DOUG 1H PAD	954196	BRAZOS	RN110959301
DOUGHTIE-JURICA PAD	954197	BURLESON	RN110024171
DRAEGER-THORPE PAD	954198	WASHINGTON	RN110629318
DROEMER 114 UNIT 1 PAD	954203	BASTROP	RN110287653
DUSEK A2 PAD	955124	BURLESON	RN111011581
DUSEK PAD	954206	BURLESON	RN110113800
EASY RIDER 1H PAD	954218	BURLESON	RN110723988
ELM UNIT EB A PAD	954230	BURLESON	RN109683649
ENGLEMANN-PERRY PAD	954235	BURLESON	RN110024239
ESTES B 2H PAD	954690	BURLESON	RN110826716
FARMERS NORTH MIMAN PAD	954243	BURLESON	RN109979708
FELD 1 PAD	954247	BURLESON	RN110193679
FINCHER 1H PAD	954251	WASHINGTON	RN110856382

FLENCHE A PAD	954254	BURLESON	RN107799983
FLENCHE B 1H PAD	954257	BURLESON	RN109463026
FLENCHE E 1H PAD	954258	BURLESON	RN109463695
FLIPPIN 133 1 PAD	954260	BURLESON	RN110480977
FLIPPIN PAD	954586	BURLESON	RN110826708
FORT APACHE 1H PAD	954268	BURLESON	RN109459925
FRANK DRGAC 2 PAD	954273	BURLESON	N/A
FRAZIER IF 20 PAD	954277	MILAM	RN110962305
FRITSCH 109 1 PAD	954280	LEE	RN110287588
GOLD 107 1 PAD	954285	LEE	RN110071461
GOODNIGHT PAD	954297	BURLESON	RN109995993
GRAFF PAD	954299	BURLESON	RN110069648
GREENWOOD-LUKSA EF PAD	954301	BURLESON	RN110024759
GROCE B-HANOVER PAD	954304	BURLESON	RN110069879
HAISLER-HEARNE PAD	954312	BURLESON	RN109979328
HARMON SCHOOL PAD	954320	WASHINGTON	RN110799905
HAZEL J CHACHER OIL UNIT PAD	954322	BURLESON	RN110183852
HEJL PAD	954325	BURLESON	RN110194644
HENSZ A 1H PAD	954339	BURLESON	RN109950220
HERRMANN EF UNIT PAD	954341	BURLESON	RN110508793
HOVORAK EF UNIT 1H PAD	954347	BURLESON	RN110963857
INEZ PAD	954358	BRAZOS	RN110403037
JAKE-NORM EF UNIT PAD	954363	BURLESON	RN109995720
JH BUCKMAN E 1 PAD	954377	BURLESON	RN110423142
JRG C 1H PAD	954393	BURLESON	RN110480969
JUSTICE 1H PAD	954402	BURLESON	RN110596780
K URBANOVSKY 136 1 PAD	954405	BURLESON	RN110829363
KAZMIR PAD	954410	BURLESON	RN110070059
KINKY MUDDL 3H PAD	954413	BURLESON	RN108359795
KOCIAN 1H PAD	954423	BURLESON	RN109996041
KOCUREK 1 PAD	954424	LEE	RN110798188
KOVAR A 1H PAD	954427	BURLESON	RN107875759
KRENEK 312 1 PAD	954428	BURLESON	RN110846235
KRIEL-ENLOE UNIT 2 PAD	954430	BRAZOS	RN110959707
LEIA 1 PAD	955090	WASHINGTON	RN110556669
LEONARD BRINKMAN PAD	954450	BURLESON	RN110508819
LEWIS UNIT 1 PAD	954453	BURLESON	N/A
LEWIS-SIPTAK PAD	954456	BURLESON	RN110034071
LIGHTSEY-CAPPS UNIT 3 PAD	954459	ROBERTSON	RN110968740
LURAE-DIETZ PAD	954188	BURLESON	RN110517869
LUTHER A PAD	954466	BRAZOS	RN110941481
MACH A 2H PAD	954499	BURLESON	RN109949818
MALAZZO EF UNIT PAD	954512	BURLESON	RN110491636
MAREK-RAY EF PAD	954515	BURLESON	RN109995886
MARGARITA PAD	954517	ROBERTSON	RN110396389
MARJORIE BARTLETT PAD	954521	BURLESON	RN110542370
MARSHALL 140 1 PAD	954526	BURLESON	RN110544277
MCCOY 1H PAD	954533	LEE	RN110859139
MCKINLEY PAD	954535	BURLESON	RN110434628
MILES A BRADLEY A PAD	954546	BURLESON	RN110287562
MISFITS UNIT EB A2H PAD	954552	BRAZOS	RN110184868
MOORE A PAD	955120	BURLESON	RN110966959
MOORE B PAD	955121	BURLESON	RN110941473
MOORING SLOUGH UNIT EB PAD	954555	ROBERTSON	RN109683714
MORELLO 1H PAD	954556	BURLESON	RN110820081
MOSES PAD	954557	BURLESON	RN110766532
MUMFORD-W YELLOW ROSE PAD	954564	ROBERTSON	RN110518750
MUSTANG SALLY PAD	954573	BURLESON	RN110508785
N ARAPAHO A PAD	954574	BURLESON	RN110403052
NEAL GARBS PAD	954576	BURLESON	RN110107786
NOWAK 1H PAD	954587	BURLESON	RN110692456
ODSTRCIL B 1H PAD	954588	BURLESON	RN110766557
PAUL 134 1 PAD	954605	BURLESON	RN110106333
PEARCE PAD	955067	BURLESON	RN110826690

PETERS PAD	954616	BURLESON	RN110106291
PIVONKA E 1 PAD	954623	BURLESON	RN110073103
POLANSKY-SOBOTIK PAD	954627	BURLESON	RN110368362
POLASEK PAD	954629	BURLESON	RN110493319
PORTER SNAP PAD	954220	BURLESON	RN101697522
RATHJEN 1 PAD	954645	BURLESON	RN110967387
RAYMOND 1 PAD	955068	BURLESON	RN110874062
RB WILKENS 1 PAD	954649	BURLESON	RN110197639
REED EF UNIT 1H PAD	954653	BURLESON	RN110441789
REGAN PAD	955069	BURLESON	RN110897659
REX TYSON JR 1H PAD	954655	BURLESON	RN110791118
RFI A 1H PAD	954656	BURLESON	RN109450718
RIO LOBO UNIT EB A1H PAD	954659	ROBERTSON	RN109683607
ROBERTS LOBRANO PAD	954667	BURLESON	RN110107794
S BUCKMAN FALSONE 1 PAD	955070	BRAZOS	RN110826682
S BUCKMAN PAD	954685	BRAZOS	RN110423159
SANTA MIA PAD	954697	WASHINGTON	RN110093283
SASSAFRAS UNIT EB A PAD	954699	BURLESON	RN109683441
SCARPINATO 1H PAD	954712	BRAZOS	RN110798162
SCHAPER MOORE PAD	954723	BURLESON	RN110024676
SCHOENEMAN C 1H PAD	954725	BURLESON	RN110749215
SCHOPPE C 1H PAD	954728	BURLESON	RN109450700
SCHOPPE PAD	954726	BURLESON	RN109950048
SCHUBERT PAD	954729	BURLESON	RN110423134
SCHWIERZKE EF UNIT PAD	954730	BURLESON	RN110508777
SCISSOR TAIL PAD	954731	BURLESON	RN109995977
SEADUCER PAD	954736	BURLESON	RN108332313
SEE A 1H PAD	954740	BURLESON	RN109949925
SEILHEIMER 1H PAD	954742	WASHINGTON	RN110727807
SHAW 1H PAD	954743	BURLESON	RN110655594
SLOVACEK A PAD	954749	BURLESON	RN110542354
SMITH B PAD	955126	BURLESON	RN110967551
SNAP C-D PAD	954759	BURLESON	RN109996058
SNAP I&J PAD	954762	BURLESON	RN109996025
SNAP K HACKBERRY UNIT EF PAD	954763	BURLESON	RN110491628
SNAP O PAD	954764	BURLESON	RN110542362
SNAP PAD	954760	BURLESON	RN109450064
SNAP-HEUSSNER PAD	954765	BURLESON	RN109905364
SORSBY 1H PAD	954767	BURLESON	RN110826674
SPLITFIRE UNIT EB A PAD	954769	BURLESON	RN109683466
STANLEY EF UNIT PAD	954770	BURLESON	RN110480951
STERN 144 1 PAD	954777	BURLESON	RN110368370
STERN 144 CHRISTIAN EF UNIT PD	954778	BURLESON	RN110508801
STIFFLEMIRE OL 1 PAD	954781	BURLESON	N/A
TATUM A PAD	955115	BURLESON	RN110833704
TEAL-WILDE EF PAD	954790	BURLESON	RN110070067
TERRIER APC 64 3 PAD	955061	BRAZOS	RN110826666
TONY T PAD	955071	BURLESON	RN110826658
TURNER-WILLIS PAD	954800	BURLESON	RN110287711
TWILIGHT 104 UNIT 1 PAD	954801	BURLESON	RN110378429
UBERNOSKY 1H PAD	954802	BURLESON	RN110368388
UNGER UNIT 1EF PAD	954803	LEE	RN108301185
VICTORICK PAD	954812	BURLESON	RN109986067
VIOLA DAVIS E 1 PAD	954815	BURLESON	N/A
W DELAMATER 1 PAD	955072	BURLESON	RN110856390
W HELWEG PAD	954820	BURLESON	RN110183969
WAR WAGON UNIT EB A1H PAD	954825	BRAZOS	RN110960911
WC LEMON 1 PAD	954831	BURLESON	N/A
WEHMEYER-WEHMEYER UNIT EB 1H P	954837	BRAZOS	RN106832488
WHITNEY 103 1 PAD	954841	BURLESON	RN110556644
WHITNEY 103 2 PAD	954842	BURLESON	RN110455094
WHITNEY 2 PAD	954843	BURLESON	RN110756020
WILLIAM B 2H PAD	954850	BURLESON	RN109995928
WILLIE LEE TARVER UNIT A PAD	954855	BURLESON	N/A

WILLIS C&D 1H PAD	954857 BURLESON	RN110113958
WINDEL-FLIPPIN PAD	954862 BURLESON	RN110071578
WINKELMANN 1H PAD	954863 WASHINGTON	RN109995985
WL RANCH 1 H PAD	954864 BURLESON	RN110968336
WOLBRUECK 1H PAD	954865 BURLESON	RN109459875
YUCCA UNIT EB A PAD	954870 BURLESON	RN109683482