

**From:** [Jonathan Walling](#)  
**To:** [REDACTED]  
**Cc:** [OCE](#)  
**Subject:** Denbury Request for Enforcement Discretion - Conroe Stack Testing  
**Date:** Thursday, April 16, 2020 5:00:43 PM  
**Attachments:** [Denbury Request for Enforcement Discretion - Conroe Stack Testing.pdf](#)

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Good afternoon, Mr. Hendricks:

Your request for enforcement discretion, as presented, relating to performance testing requirements in 40 CFR Part 60 Subpart JJJ, §60.4243(b) and §60.8(d) and permit 143469 at Denbury's Conroe Gas Processing Plant in Montgomery County is approved with the following qualifications:

- Enforcement Discretion is limited to the Texas Commission on Environmental Quality. It does not limit EPA's ability enforce federal regulations; and
- This enforcement discretion will be in effect until June 30, 2020. The required tests should be conducted as soon as practicable before this date, as conditions allow. Should an extension beyond this be needed, please re-submit your request.

Regards,

Jonathan Walling, Area Director  
Coastal & East Texas Area  
Texas Commission on Environmental Quality

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**From:** Kevin Hendricks <[REDACTED]>  
**Sent:** Thursday, April 16, 2020 2:38 PM  
**To:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>; Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Cc:** Randy Robichaux <[REDACTED]>  
**Subject:** Denbury Request for Enforcement Discretion - Conroe Stack Testing

Mr. Garcia,

A request for enforcement discretion associated with the onset of COVID-19 (coronavirus) and the Governor's Proclamation of a state of disaster in Texas is attached.

During this period Denbury is requesting enforcement discretion, the facility will still maintain records adequate to document activities related to this request.

Thank you,

**Kevin Hendricks, Environmental Engineering Technical Lead**  
Denbury Resources, Inc., 5320 Legacy Drive, Plano, Texas 75024  
O: 972-673-2529, M: 214-790-2084, [REDACTED]



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April 16, 2020

TCEQ Houston Region 12  
Attn: Air Section Stack Testing Team  
5425 Polk Avenue, Suite H  
Houston, TX 77023-1452

**RE: 40 CFR Part 60 Subpart JJJJ - Performance Testing - §60.4243(b), §60.8(d)  
Request for Enforcement Discretion due to COVID-19  
Conroe Gas Processing Plant – RN100211622  
Permit Number – PBR 143469  
Denbury Onshore, LLC – CN602946782**

Denbury Onshore, LLC (Denbury) respectfully submits this request for enforcement discretions regarding Performance Testing for the referenced Regulated Entity (RN). Denbury operates the below-referenced engines in Montgomery County. It has been determined that 40 CFR Part 60 Subpart JJJJ (JJJJ) is applicable to the non-emergency, non-certified engines. Denbury notified TCEQ and planned to perform the required emissions testing on May 5-7, 2020 in order to conduct the testing in accordance with the annual timeline established in JJJJ. Denbury would like to postpone the referenced performance testing until after June 2020.

Denbury is only requesting enforcement discretion from the performance testing requirements in 40 CFR 60 Subpart JJJJ found in 60.4243(b). Denbury will continue to follow the appropriate control requirements and operate the engines in accordance with JJJJ.

Due to the current pandemic involving COVID-19 (coronavirus), in accordance with infectious disease control guidelines, Denbury has implemented a policy to minimize field work and personnel contact as an attempt to prevent potential spread of this disease through social distancing during the second quarter of 2020. This Denbury work protection policy will not allow Denbury to complete the referenced performance testing prior to the annual deadline required by JJJJ.

<b>Owner/Operator Name and Address</b>		Denbury Onshore, LLC 5320 Legacy Drive, Plano, TX 75024	
<b>Address of Affected Sources</b>		12770 Koalstad Rd., Conroe, Montgomery County, TX, 77302	
<b>Emission Point Number</b>	<b>ENG-01</b>	<b>ENG-02</b>	<b>ENG-03</b>
<b>Engine Unit No.</b>	C-3500	C-3510	C-3520
<b>Engine Make/Model</b>	Caterpillar G3516B	Caterpillar G3516B	Caterpillar G3516B
<b>Engine Power/ Displacement</b>	1380 HP	1380 HP	1380 HP
<b>Engine Family</b>	4SLB	4SLB	4SLB
<b>Serial Number</b>	811047	811049	411645
<b>Date of Manufacture</b>	>2013	>2013	>2013
<b>Engine Start-up Date</b>	3/22/2017	3/22/2017	3/22/2017
<b>Emission Control Equipment</b>	Oxidation Catalyst	Oxidation Catalyst	Oxidation Catalyst
<b>Fuel Used</b>	Field gas	Field gas	Field gas
<b>Rescheduled Test Dates</b>	<b>TBD</b>	<b>TBD</b>	<b>TBD</b>

If you have any questions regarding this notification, please contact me at [REDACTED] or via phone (972) 673-2529.

Sincerely,

Kevin Hendricks  
Environmental Engineering Technical Lead  
Denbury Onshore, LLC