

From: [Jonathan Walling](#)
To: [REDACTED] [Randy Robichaux](#)
Cc: [OCE](#)
Subject: Denbury Request for Enforcement Discretion - Oyster Bayou Stack Testing
Date: Friday, April 24, 2020 1:26:20 PM
Attachments: [Denbury Request for Enforcement Discretion - Oyster Bayou Stack Testing.pdf](#)

Good afternoon, Mr. Hendricks:

Your request for enforcement discretion, as presented, relating to performance testing requirements in 40 CFR Part 60 Subpart JJJJ, §60.4243(b) and §60.8(d) and permit 41678 at Denbury's Oyster Bayou CO₂ Recycling Facility in Chambers 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 submit a request to extend this date.

Regards,

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

From: Kevin Hendricks <[REDACTED]>
Sent: Friday, April 24, 2020 9:58 AM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: Randy Robichaux <[REDACTED]>
Subject: Denbury Request for Enforcement Discretion - Oyster Bayou 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 24, 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
Oyster Bayou CO2 Recycling Facility – RN101061893
Chambers County, Texas
Permit Number 41678
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 Chambers County. It has been determined that 40 CFR Part 60 Subpart JJJJ (JJJJ) is applicable to the non-emergency, non-certified engines. Denbury planned to perform the required emissions testing during the second quarter of 2020 in order to conduct the testing in accordance with the 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. This Denbury work protection policy will not allow Denbury to complete the referenced performance testing prior to the annual and modification deadlines required by JJJJ.

Engine Unit No.	CBA-4220	CBA-3220	CBA-2220
EPN	E-1	E-2	E-3
Engine Make/Model	Caterpillar 3608	Caterpillar 3608	Caterpillar 3608
Engine Power/ Displacement	2370 HP/Unknown	2370 HP/Unknown	1547 HP/Unknown
Engine Family	4SLB	4SLB	4SLB
Emission Control Equipment	Oxidation Catalyst, SCR	Oxidation Catalyst, SCR	Oxidation Catalyst, SCR
Fuel Used	Purchased Fuel Gas	Purchased Fuel Gas	Purchased Fuel Gas
Test Dates	TBD	TBD	TBD

Engine Unit No.	CBA-1220	CBA-1320
EPN	E-4	E-5
Engine Make/Model	Caterpillar 3606	Caterpillar 3608
Engine Power/ Displacement	2370 HP/Unknown	2370 HP/Unknown
Engine Family	4SLB	4SLB
Emission Control Equipment	Oxidation Catalyst, SCR	Oxidation Catalyst, SCR
Fuel Used	Purchased Fuel Gas	Purchased Fuel Gas
Test Dates	TBD	TBD



Owner/Operator Name and Address	Denbury Onshore, LLC 5320 Legacy Drive, Plano, TX 75024
Address of Affected Sources	From Winnie, TX drive south on TX-124 for ~8 miles, Turn right on FM Road 1941 for ~8 miles, keep left to enter Oyster Bayou field, drive about 1 mile on unknown road to compressor location.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Hendricks".

Kevin Hendricks
Environmental Engineering Technical Lead
Denbury Onshore, LLC