

**From:** [David Ramirez](#)  
**To:** [Oksana Wright](#)  
**Cc:** [OCE](#); [Ramiro Garcia](#); [Anita Keese](#)  
**Subject:** RE: Potential Enforcement Discretion Request for RN106138886 PBR 96195  
**Date:** Wednesday, May 27, 2020 5:34 54 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

Good afternoon Ms. Wright,

The TCEQ has received your request for enforcement discretion for a total of eight emissions monitoring (stack) testing events at Everest Central Production Facility "EPF" (RN110043148), Monroe West 1-17 Production Facility (RN106138886) and Scorpion Central Production Facility "CPF" (RN109952325). We appreciate the additional detail you have provided in describing to us your business plan to synchronize the testing for these units. While enforcement discretion is not required for five of these engine tests, we are also granting further time to allow this testing to occur for only one of the engines for which enforcement discretion has already been granted. Specifically, you have requested:

- Emission monitoring (stack) testing for natural gas driven compressor engines as required by 40 CFR Part 60 Subpart JJJJ §60.4243(a)(2)(iii), §60.4244(a), (b), (d) for engines ENG3 and ENG4 at the Everest EPF Facility
- Emission monitoring (stack) testing for a stationary internal combustion engine as required per 30 TAC §117.8140(a)(2)(A) for engine ENG1 at the Monroe West 1-19 Production Facility.

At this time, your enforcement discretion **is granted until July 25, 2020 for the pre-test notice and August 25, 2020** for the engine testing at the Monroe West 1-17 site **only**. The enforcement discretion request for the two engines at the Everest CPF engine site is denied. As a reminder, these required activities should be completed as soon as practicable, as conditions allow, on or before this date, and should an extension beyond this be needed, please re-submit your request. This discretion is limited to the Texas Commission on Environmental Quality and does not limit EPA's ability to enforce federal regulations.

The TCEQ remains committed to working with our regulated community on a case by case basis. Regulated entities must maintain records adequate to document activities related to the noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

Regards,  
 David A. Ramirez, Area Director  
 Border and Permian Basin Area  
 Texas Commission on Environmental Quality

**From:** Oksana Wright <[REDACTED]>  
**Sent:** Tuesday, May 26, 2020 10:49 AM  
**To:** David Ramirez <[david.ramirez@tceq.texas.gov](mailto:david.ramirez@tceq.texas.gov)>  
**Cc:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>; Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>; Anita Keese <[anita.keese@tceq.texas.gov](mailto:anita.keese@tceq.texas.gov)>  
**Subject:** RE: Potential Enforcement Discretion Request for RN106138886 PBR 96195

Dear Mr. Ramirez,

I would like to ask for your discretionary approval to allow Battalion Oil production operations to synchronize engine stack testing dates for the affected units. All of the units are located in the same TCEQ oversight region (6 units in Ward County and 2 units in Pecos County); the affected RN identification are included in the table below. Three sets of dates (in orange) identify the affected units for which the potential enforcement discretion requests have been filed previously. By allowing the later testing dates, will most likely provide for more accurate testing conditions since a number of our production wells have been shut it due to low oil demand; with the lower throughput volumes we may not be able to achieve 100% (-10%) loads. We anticipate that, as the national economy slowly restarting, oil demand will rise, which will allow us to bring our wells back online. With achieving our maximum production volumes, we'll be able to run the compressor engines at full loads, which in turn will ensure our ability to accurately follow the stack testing methodology. With this request the required testing is proposed to commence the week of September 21, 2020, with the pre-test notice due by August 20, 2020.

| Location Name                   | EPN, MAKE, MODEL                 | Type | BHP  | Mnf Date | Permitted Emission Limits, g/hp-hr  | 30-day Pre-test Notice Due Date | Test Due Date | Desired Test Date: |
|---------------------------------|----------------------------------|------|------|----------|---|---------------------------------|---------------|--------------------|
| Everest CPF<br>RN110043148      | ENG1 CAT G3516ULB<br>SNN6W00400  | 4SLB | 1380 | 01/30/18 | VOC=0 5, NOx=0 5, CO=2  | 10/11/20                        | 11/11/20      | 9/23/2020          |
|                                 | ENG4 CAT G3516LE<br>SN4EK03186   | 4SLB | 1340 | 12/28/18 | NOx=0 5, CO=1, VOC=0 26,<br>HCHO<0 05 (tested CO 0 07, NOx<br>0 37, VOC 0 16) | 07/25/20                        | 08/25/20      | 9/22/2020          |
|                                 | ENG5 CAT G3516LE<br>SN4EK00932   | 4SLB | 1340 | 01/21/19 | NOx=0 5, CO=1, VOC=0 26,<br>HCHO<0 05 (tested CO 0 22, NOx<br>0 39, VOC 0 19) | 07/25/20                        | 08/25/20      | 9/22/2020          |
|                                 | ENG6 CAT G3608LE<br>SN3XF00026   | 4SLB | 2370 | 01/30/19 | NOx=0 5, CO=1, VOC=0 26,<br>HCHO<0 05   | 08/22/20                        | 09/21/20      | 9/21/2020          |
|                                 | ENG7 CAT G3606LE<br>SN4WF00093   | 4SLB | 1775 | 01/30/19 | NOx=0 5, CO=1, VOC=0 26,<br>HCHO<0 05   | 08/22/20                        | 09/21/20      | 9/21/2020          |
| Monroe West 1-17<br>RN106138886 | ENG1 CAT G3408TALE<br>SN6NB04738 | 4SLB | 400  | 02/23/07 | State-only VOC=1, NOx=2, CO=4   | 06/06/20                        | 07/06/20      | 9/23/2020          |
|                                 | ENG3 CAT G3516B                  | 4SRB | 1380 | 04/14/14 | VOC=0 55, NOx=0 5, CO=1,  | 10/13/20                        | 11/12/20      | 9/24/2020          |

|                             |                        |      |      |          |  |          |          |                  |
|-----------------------------|------------------------|------|------|----------|--|----------|----------|------------------|
| Scorpion CPF<br>RN109952325 | <b>ENG4 CAT G3516B</b> | 4SRB | 1380 | 01/28/13 | HCHO=0.1<br>VOC=0.55, NOx=0.5, CO=1,<br>HCHO=0.1 | 10/13/20 | 11/12/20 | <b>9/24/2020</b> |
|-----------------------------|------------------------|------|------|----------|--|----------|----------|------------------|

Please do not hesitate to contact me if you have any questions regarding this request or if I could provide any additional insights into the current operating conditions.

In advance, thank you for your review and consideration of this request.



**Regards,**  
**Oksana Wright**  
*Environmental Manager*  
(713) 210-7528 Direct  
(281) 610-8661 Mobile  
(713) 806-6548 WTX Field Mobile

P.S. Please note our new company name! No changes to our MSAs or invoicing, Battalion Oil Corporation will be issuing the checks. Visit [www.battalionoil.com](http://www.battalionoil.com) for more information.

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**From:** David Ramirez [<mailto:david.ramirez@tceq.texas.gov>]  
**Sent:** Tuesday, April 07, 2020 5:19 PM  
**To:** Oksana Wright <[REDACTED]>  
**Cc:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>; Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>; Anita Keese <[anita.keese@tceq.texas.gov](mailto:anita.keese@tceq.texas.gov)>  
**Subject:** RE: Potential Enforcement Discretion Request for RN106138886 PBR 96195

Good afternoon Ms. Wright,

The TCEQ has received your request for enforcement discretion for the Monroe West 1-17 Production Facility (RN106138886) owned and operated by Halcon Operating Co., Inc. Your request is approved in accordance with the representation in your request for:

- Biennial emission monitoring (stack) testing for a stationary internal combustion engine as required per 30 TAC §117.8140(a)(2)(A).

Your enforcement discretion is effective until **June 6, 2020 for the pre-test notice and July 6, 2020 for the engine testing**. These required activities should be completed as soon as practicable, as conditions allow, before this date, and should an extension beyond this be needed, please re-submit your request.

The TCEQ remains committed to working with our regulated community on a case by case basis. Regulated entities must maintain records adequate to document activities related to the noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

Regards,  
David A. Ramirez, Area Director  
Border and Permian Basin Area  
Texas Commission on Environmental Quality

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**From:** Oksana Wright <[REDACTED]>  
**Sent:** Monday, April 6, 2020 9:00 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)>; Bryant Murray <[Bryant.Murray@tceq.texas.gov](mailto:Bryant.Murray@tceq.texas.gov)>  
**Subject:** Potential Enforcement Discretion Request for RN106138886 PBR 96195

Re: **Potential Enforcement Discretion Request for  
Halcon Operating Co., Inc. CN600126528  
Monroe West 1-17 Production Facility RN106138886 PBR 96195**

The aforementioned facility operates a natural gas driven compressor engine for an artificial oil lift. The engine is a Caterpillar 3408 lean-burn 400 HP model manufactured on 02/23/2007 and as such is subject to the State-only requirements for biennial testing per 30 TAC §117.8140(a)(2)(A). The due date for this test falls on 05/27/2020, with a pre-test notice due to the Regional Office by 04/27/2020.

Considering the current constraints imposed on various businesses and service providers due to the coronavirus pandemic, a postponement of the required testing is highly desired and, therefore, the enforcement discretion is being requested. With what is known about the virus at this time, a 180-day postponement is deemed to be sufficient in anticipation for the current situation to improve. In the interim, our intent is to continue to operate the affected unit in accordance with the manufacturer's recommendations and the industry standards, including preventive maintenance as needed and quarterly portable analyzer emission checks. Records of these compliance activities will be retained within the facility's environmental files.

Your consideration and approval of this request is highly appreciated. If you have any questions or require any additional information, please do not hesitate to contact me by replying to this email or via phone at 713-210-7528.

Regards,  
**Oksana A. Wright**   
*Environmental Manager*  
713-210-7528 Direct  
281-610-8661 Mobile  
713-806-6548 Mobile while in WTX Field



1000 Louisiana Suite 6600 Houston TX 77002  
battalionoil.com | 832.638.0300

P.S. Please note our new company name! No changes to our MSAs or invoicing, Battalion Oil Corporation will be issuing the checks. Visit [www.battalionoil.com](http://www.battalionoil.com) for more information.

**CAUTION:** This Email is from an EXTERNAL source outside of BattalionOil. Please use caution with attachments and URL links.