

From: [David Ramirez](#)
To: [Oksana Wright](#)
Cc: [Ramiro Garcia](#); [Anita Keese](#); [OCE](#)
Subject: RE: Potential Enforcement Discretion Request for RN110043148, NRSP149425, GOP514 #O4103
Date: Tuesday, May 19, 2020 8:44:22 AM
Attachments: [image001.png](#)

Good morning Ms. Wright,

The TCEQ has received your request for enforcement discretion for the Everest Central Production Facility (RN110043148) owned and operated by Halcon Operating Co., Inc. Specifically, you have requested an extension for:

- 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).

At this time, your enforcement discretion is effective only until July 25, 2020 for the pre-test notice and August 25, 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. 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: Friday, May 15, 2020 3:25 PM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; Bryant Murray <Bryant.Murray@tceq.texas.gov>
Subject: Potential Enforcement Discretion Request for RN110043148, NRSP149425, GOP514 #O4103

Re: **Potential Enforcement Discretion Request for
Halcon Operating Co., Inc. CN600126528
Everest Central Production Facility RN110043148, NRSP149425, GOP514 #O4103**


The aforementioned facility operates two (2) natural gas driven compressor engines for

compression of gathered gas into a sales pipeline. Both engines are Caterpillar G3516LE 1340 HP models manufactured after 7/1/2010 (EPNs ENG4 and ENG5) and as such are subject to 40 CFR Part 60 Subpart JJJJ §60.4243(a)(2)(iii), §60.4244(a), (b), (d) requirements for annual testing. The due date for the emissions stack tests falls on 06/25/2020, with a written pre-test notice due to the Regional Office by 05/25/2020.

Considering the continuous rise in positive cases of COVID-19 and record high daily mortality cases in Texas, it is our concern that the testing personnel while adhering to the testing protocol (3 consecutive hours for each engine) and minimal space within the testing trailer (less than 6 feet) and close interactions with an engine mechanic, will not be able to adhere to the recommended self-protective measures. Out of this concern I would like to request for the required testing to be delayed at least until October 2020. In the interim, our intent is to continue to operate the affected units in accordance with the manufacturer's recommendations and the industry standards. Records of the engines' run hours and performed preventive maintenance 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 : 832.538.0300

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 for more information.