

From: [David Ramirez](#)
To: [Oksana Wright](#)
Cc: [OCE](#); [Ramiro Garcia](#); [Anita Keese](#)
Subject: RE: Potential Enforcement Discretion Request for RN106138886 PBR 96195
Date: Tuesday, April 7, 2020 5:18:43 PM
Attachments: [image001.png](#)

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

From: Oksana Wright <[REDACTED]>
Sent: Monday, April 6, 2020 9:00 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 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
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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.