

**From:** [David Ramirez](#)  
**To:** [Cannady, Jeremy](#)  
**Cc:** [Tracy Miller](#); [Anita Keese](#); [Ramiro Garcia](#); [OCE](#); [Jonathan Walling](#); [Cynthia Gandee](#)  
**Subject:** RE: COVID19 Waiver Request– Merit Energy Company CN600519219  
**Date:** Friday, August 14, 2020 12:08:07 PM

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Good afternoon Mr. Cannady,

The TCEQ has received your request for enforcement discretion to postpone quarterly leak detection and repair (LDAR) programs for 90 days for the following facilities owned and operated by Merit Energy Company, LLC (CN600519219). Also, please note changes to identified RNs below.

<b>Facility Name Provided</b>	<b>Regulated Entity Number</b>	<b>Regulated Entity Name</b>	<b>County</b>
MCGILL BROS. 623	RN105639256	KELSEY MCGILL CENTRAL PRODUCTION FACILITY	Hidalgo
McAllen Ranch Manifold	(RN102670231 provided. Replaced with...) RN102583770	MCALLEN RANCH MANIFOLD 5 PRODUCTION FACILITY	Hidalgo
McAllen Ranch Central Facility	RN102599560	MCALLEN RANCH CENTRAL PRODUCTION FACILITY SAND BLASTING	Hidalgo
South La Copita Facility	RN101982882	SOUTH LACOPITA PRODUCTION FACILITY	Starr
Bentsen Central IV Facility	RN104928619	BENTSEN TRACT IV 1 COMPRESSOR STATION	Starr
El Ebanito Facility	RN100841097	EL EBANITO FACILITY	Starr
Javelina Central Facility	RN102570231	JAVELINA CENTRAL PRODUCTION FACILITY	Hidalgo
Jeffress Northeast Facility	(RN102670231 provided. Replaced with...) RN102830486	JEFFRESS NORTHEAST PRODUCTION FACILITY	Hidalgo
East McCook Central Facility	RN102570595	EAST MCCOOK CENTRAL PRODUCTION FACILITY	Hidalgo
Monte Cristo Facility	RN102645207	MONTE CRISTO PRODUCTION FACILITY	Hidalgo
Ward Facility	RN102516978	WARD FACILITY	Hidalgo
Pharr No. 26 Facility	RN104147277	PHARR NO 26 PRODUCTION FACILITY	Hidalgo
USA Pad 2-12	RN104330519	BOB WEST PAD 2 COMPRESSOR FACILITY	Starr

Sinor Wilcox Facility #2	RN107177529	SINOR WILCOX TANKING FACILITY 2	Live Oak
Sinor Wilcox Facility #1	RN106857493	SINOR RANCH A 1	Live Oak
Roden No. 1 Oil & Gas Production Facility	(RN102670231 provided. Replaced with...) RN105650147	RODEN NO 1 OIL AND GAS PRODUCTION FACILITY	Lavaca
Robertson Central Production Facility	RN105650063	ROBERTSON CP OIL AND GAS PRODUCTION FACILITY	Lavaca

Quarterly LDAR monitoring is required as part of the facility's certified emissions authorization under 30 TAC 106.352, Permit by Rule in which emission control factors employing a TCEQ 28 VHAP Leak Detection Program is employed. Your enforcement discretion is approved, however, **only until September 30, 2020**. The TCEQ remains committed to working with our regulated community on a case by case basis. This required activity 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.

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:** Ramiro Garcia <ramiro.garcia@tceq.texas.gov>  
**Sent:** Wednesday, August 12, 2020 12:55 PM  
**To:** Cannady, Jeremy <[REDACTED]> OCE <OCE@tceq.texas.gov>  
**Cc:** Tracy Miller <tracy.miller@tceq.texas.gov>; David Ramirez <david.ramirez@tceq.texas.gov>; Anita Keese <anita.keese@tceq.texas.gov>  
**Subject:** RE: COVID19 Waiver Request– Merit Energy Company CN600519219

Good afternoon Mr. Cannady,

This emails confirms receipt of your correspondence. We are reviewing your request and expect to have a response soon.

Best regards,

Ramiro Garcia, Jr.  
Deputy  
Office of Compliance & Enforcement

TCEQ

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**From:** Cannady, Jeremy <[REDACTED]>  
**Sent:** Wednesday, August 12, 2020 11:56 AM  
**To:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>; Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Subject:** COVID19 Waiver Request– Merit Energy Company CN600519219

Dear Mr. Garcia:

Merit Energy Company would like to request an enforcement waiver relating to the COVID19 pandemic in accordance to the EPA MEMO "COVID-19 Implications for EPA's Enforcement and Compliance Assurance Program" dated March 26, 2020.

Merit would like to request a 90-day extension to the 6-month periodic LDAR testing requirement 60.5397a(g)(1) at the following facilities:

MCGILL BROS. 623	Javelina Central Facility	Nopal Gas Treating Facility
McAllen Ranch Manifold #5	Jeffress Northeast Facility	Leonard Haynes # 204
McAllen Ranch Central Facility	Monte Cristo Facility	Leonard Haynes # 119
South La Copita Facility	Ward Facility	Leonard Haynes # 173
Bentsen Central IV Facility	East McCook Central Facility	Leonard Haynes # 14
El Ebanito Facility	Pharr No. 26 Facility	Leonard Haynes # 27
Sinor Wilcox Facility #2	USA Pad 2-12	SINOR RANCH #1
Sinor Ranch A 07	Sinor Wilcox Facility #1	Sinor Ranch A 11
Sinor Ranch A 10	Sinor Ranch C 02	Sinor Ranch A 12
Roden 1-3 Pad	Roden No. 1 Production Facility	RODEN #1
Robertson Central Production Facility		

The facilities are currently in areas that are experiencing a large increase in COVID19 cases. Due to staff scheduling and company traveling restrictions conducting these tests is not reasonably feasible at this time. Merit will continue to monitor the situation and will make rescheduling a priority. In the event that rescheduling is not possible during the 90 days Merit will submit another extension and document the attempts to remain in compliance.

Please contact me at (432)643-7796 or [REDACTED] if you have any questions or require further information regarding this matter.

Sincerely,

**Jeremy Cannady - Environmental Analyst**

**Merit Energy Company**

13727 Noel Road, Suite 1200

Dallas, TX 75240

P: (972) 628.1487

C: (432) 634.7796

[REDACTED]





August 12, 2020

Mr. Ramiro Garcia, Jr.  
Deputy Director  
Office of Compliance and Enforcement  
Texas Commission on Environmental Quality

RE: COVID19 Waiver Request– **Merit Energy Company**  
**Customer Number: CN600519219**

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Sincerely,

Jeremy Cannady  
Senior Environmental Analyst  
Merit Energy Company