

From: [David Ramirez](#)
To: [REDACTED]
Cc: [OCE](#); [Anita Keese](#); [Ramiro Garcia](#)
Subject: RE: Request for TCEQ Enforcement Discretion - SWEPI LP (CN600880249), Super Stallion Central Production Facility (RN106408404), Ward County
Date: Wednesday, March 25, 2020 3:58:56 PM

Good afternoon Ms. Tiesman,

The TCEQ has received your request for enforcement discretion to postpone quarterly leak detection and repair (LDAR) programs for the Super Stallion Central Production Facility (RN106408404) owned and operated by SWEPI LP. 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 request is approved in accordance with the representations in your request and is effective until May 15, 2020. The TCEQ remains committed to working with our regulated community on a case by case basis and reserves the right to withdraw this approval.

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

On Mar 25, 2020, at 12:14 AM, [REDACTED] <[REDACTED]>
wrote:

To: Ramiro Garcia – TCEQ

March 24, 2020

RE: Request for TCEQ Enforcement Discretion
Quarterly LDAR Monitoring - Q12020
SWEPI LP (CN600880249)
Super Stallion Central Production Facility (RN106408404)
Ward County, Texas
TCEQ Permit by Rule (Permit Number 122839)

SWEPI LP is requesting enforcement discretion for Super Stallion Central Production Facility in Ward County to delay completion of quarterly Leak Detection and Repair (LDAR) monitoring.

As part of the facility's certified emissions authorization under 30 TAC 106.352, Permit

by Rule, SWEPI LP took emission control factors employing a TCEQ 28 VHAP Leak Detection Program. Quarterly monitoring has been conducted at the facility since 2014 using an outside third-party contracting firm. Over the last four quarters, SWEPI has monitored a total of 6,732 components, with only 4 leaks identified resulting in a 2019 annual leak rate of <0.06%.

In line with the emission control TCEQ 28 VHAP standards, the Q12020 monitoring is currently scheduled for the week of March 30, 2020. Due to the current public health emergency and Texas Governor Abbott's issuance of a public health disaster for the State of Texas, SWEPI LP has initiated protocols to enhance the protection of the health and welfare of personnel in its Permian Asset while maintaining the safe, stable, reliable, and compliant operation of critical infrastructure. At a high level, those protocols include:

- Limiting staff personnel at our facilities and in field locations to only those necessary to maintain critical business functions,
- Reducing the use of outside contracting personnel to only business critical activities, and
- Instituting social distancing and shelter in place initiatives, including reducing field activities so office and field staff can work from home.

To limit the possible exposure of both groups (SWEPI LP staff and outside contractors) as well as reduce the potential safety risk to outside contractors with only limited SWEPI LP onsite staff to oversee and engage, SWEPI LP is requesting a delay for the Q1 monitoring until at least May 15, 2020. By this date, SWEPI LP will either complete the required monitoring or report back to TCEQ to evaluate the current public health status and dialogue with the agency.

Please contact me with any questions regarding this TCEQ enforcement discretion request. I can be reached at the following:

Mobile: 713-857-6950

Mobile: 713-240-1394

Email: [REDACTED]

Lisa L. Tiesman | Air SME | Team Lead – Permian Environmental & Regulatory | Unconventionals

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[REDACTED]