

From: [David Ramirez](#)
To: [REDACTED]
Cc: [REDACTED] [Anita Keese](#); [Ramiro Garcia](#); [OCE](#)
Subject: RE: Request for TCEQ Enforcement Discretion - SWEPI LP (CN600880249), Super Stallion Central Production Facility (RN106408404), Ward County
Date: Wednesday, July 1, 2020 1:25:51 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 enforcement discretion is effective until August 15, 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

From: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Sent: Tuesday, June 30, 2020 8:03 PM
To: [REDACTED] OCE <OCE@tceq.texas.gov>
Cc: [REDACTED] Tracy Miller <tracy.miller@tceq.texas.gov>; Susan Johnson <susan.johnson@tceq.texas.gov>; David Ramirez <david.ramirez@tceq.texas.gov>; Anita Keese <anita.keese@tceq.texas.gov>
Subject: RE: Request for TCEQ Enforcement Discretion - SWEPI LP (CN600880249), Super Stallion Central Production Facility (RN106408404), Ward County

Good evening Ms. Tiesman,

This email 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

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, June 30, 2020 4:45 PM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: [REDACTED]
Subject: Request for TCEQ Enforcement Discretion - SWEPI LP (CN600880249), Super Stallion Central Production Facility (RN106408404), Ward County

To: Ramiro Garcia – TCEQ

June 30, 2020

RE: Request for TCEQ Enforcement Discretion
Quarterly LDAR Monitoring – Q22020
SWEPI LP (CN600880249)
Super Stallion Central Production Facility (RN106408404)
Ward County, Texas
TCEQ Permit by Rule (Permit Number 122839)

June 30, 2020
Request for TCEQ Enforcement Discretion
Quarterly LDAR Monitoring – Q22020
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 (CPF) 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 March 2020, SWEPI requested enforcement discretion for Super Stallion CPF Q12020 monitoring until May 15, 2020. This enforcement was granted and due to the decline in Covid-19 cases in early May and increased screening activities, SWEPI LP was able to introduce contractors for monitoring activities and completed the Q12020 monitoring prior to May 15, 2020 at the Super Stallion CPF.

The Q22020 monitoring is currently scheduled for the week of June 29, 2020. Due to the recent spike in Covid-19 cases in the Midland/Odessa area and Ward County, SWEPI LP is once again limiting contractor involvement. SWEPI LP Permian Asset is delaying the opening of business offices and is limiting office personnel to only those with essential tasks, while still maintaining protocols for 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 Q2 monitoring until August 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

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