

**Stakeholder Meeting**  
**Rule Language Development for Selected**  
**Oil & Gas and VOC Stationary Source Control Strategies**  
**Regional Air Quality Council | Junior Achievement Board Room, 2nd Floor**  
**1445 Market Street | Denver, 80202**  
**Tuesday, May 28, 2008 | 8:30 a.m. to Noon**

**Comments Discussion**

- Comments received
  - Rocky Mountain Clean Air Action
  - Anadarko Petroleum and Noble Energy
  - Whiting Petroleum
  - Renegade Oil & Gas
  - EPA Region 8
- General comments
  - Short turn around
  - Planning on providing additional comments
- General responses
  - Appreciate any and all comments
  - Short turn around
  - Working to respond &/or incorporate comments received
  - Need time to fully respond, especially for detailed info or info where additional info is being requested
  - Some comments received were outside of meeting scope – will address later in process
- Process to respond to comments
  - Today:
    - Comment highlights
    - Briefly discuss comments received for which Division is seeking additional information
  - Next steps
    - Work in progress: post comments and developed responses prior to 6/11/08 meeting
    - Walk thru highlights at 6/11/08 meeting
      - Responses
      - Pending responses – need additional info
      - Responses still being developed

**Comments that the Division is still considering but requests additional info**

**CONDENSATE TANKS:**

- **90 day control requirement applies to 1 tpy sources**

Request:

- Please submit information on the number of new or modified sources between the 1 and 2 tpy (projected)

- **True minor sources comply with rolling-12 month total recordkeeping differs from Division policy**

Request:

- Please submit cost estimates on generating rolling-12 month total recordkeeping

- **95% vs. 98% control efficiency**

Request:

- Please submit information on ability of VRU's to meet the 98% control efficiency
- Please submit information on actual VRU downtime

- **Requirement to install flares conflicts with Governor's Climate Action Plan**

Request:

- Please submit estimates on the amount of CO<sub>2</sub>e generated per flare and per VRU

- **Requirement to install/operate auto-igniters and continuous monitoring surveillance**

Request:

- Please submit cost estimates per auto-igniter and continuous monitoring surveillance system, along with estimates on the numbers of each companies would have to install

- **Refracing/stimulation triggers modification**

Request:

- Please submit cost estimate of conducting RACT analysis and submitting corresponding permit application

**EXEMPTIONS:**

- **Data supporting exemption changes**

Request:

- Please submit information on actual emissions from any source category in question
  - Drill rigs
  - Heater treaters
  - Separators

- Reboilers
- Others

**REG 3/7 RACT FIX-UP:**

- **Don't rely upon Federal Register posting to trigger permit application submittal date**

Request:

- Please comment on which event should trigger permit application clock – designation of non-attainment?