



# Latest on the Proposed WYDEQ BACT Policy

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# WYDEQ Proposed Changes



- Making increased control requirements to “concentrated development areas”, the Jonah and Pinedale Anticline Development Area (JPAD), and Statewide
- Concentrated Development Areas are the counties of Uinta, Lincoln, Sublette (except JPAD), Sweetwater, Carbon, Natrona, and Fremont
- Proposed changes as of 1/18/2010.

# Changes Proposed for Concentrated Development Areas



- **Condensate Tanks**

- PAD facilities, 98% control upon first date of production (FDOP) or modification.
- Single wells,  $\geq 8$  TPY VOC install 98% control within 60 days of first date of production (FDOP) or modification

- **Dehydration Units –**

- Glycol flash separators and still vent condensers upon FDOP or modification.
- 98% control of potential uncontrolled emissions of  $\geq 8$  TPY VOC within 30 days of FDOP or modification.

- **Pneumatic Pumps –**

- PAD facilities 98% control upon FDOP or modification.
- Single wells, 98% control within 60 days of FDOP or modification if tank or dehy emission control on site. If no tank or dehy control, use solar, electric, or air-driven pumps in lieu of NG operated pumps except for heat medium pumps.

# Concentrated Development Areas Continued



- **Pneumatic Controllers** –Low-bleed or no-bleed upon FDOP or modification\*
- **Produced Water Tanks** –
  - Pad facilities, 98% control upon FDOP or modification.
  - Single wells, 98% control at sites where flashing emissions must be controlled within 60 days of FDOP or modification.
  - No open top tanks
- **Well Completions** – Obtain a green completions permit
- **Blowdowns/Venting** – Best management practices and information gathering will be incorporated into permits for new and existing facilities.

\* Low bleed devices vent less than 6 cf per hour.

# Changes Proposed State Wide



- **Condensate Tanks** –  $\geq 10$  TPY VOC 98% control within 60 days of FDOP or modification.
- **Dehydration Units** –
  - Glycol flash separators and still vent condensers upon FDOP or modification.
  - 98% control of potential uncontrolled emissions of  $\geq 8$  TPY VOC within 30 days of FDOP or modification.
- **Pneumatic Pumps** –
  - PAD facilities 98% control upon FDOP or modification.
  - Single wells, 98% control within 60 days of FDOP or modification if tank or dehy emission control on site. If no tank or dehy control, use solar, electric, or air-driven pumps in lieu of NG operated pumps except for heat medium pumps.
- **Pneumatic Controllers** – Low-bleed or no-bleed upon FDOP or modification\*
- **Blowdowns/Venting** – Best management practices and information gathering will be incorporated into permits for new and existing facilities.

\* Low bleed devices vent less than 6 cf per hour.

# Changes Proposed for the Jonah and Pinedale Development Areas



- **Pneumatic Pumps** – Other pneumatic gas-operated pumps besides heat medium pumps control 98% of all emissions or route to a closed loop system upon FDOP or modification.
- **Pneumatic Controllers** –Low-bleed or no-bleed upon FDOP or modification\*
- **Produced Water Tanks** – 98% control of all produced water tanks upon FDOP or modification. No open top tanks.
- **Blowdowns/Venting** – Best management practices and information gathering will be incorporated into permits for new and existing facilities.

\* Low bleed devices vent less than 6 cf per hour.

# Blow Down/Venting Requirements



- Best Management Practices and information gathering will be incorporated into permits for new and existing facilities.
- During manual and automated blow down/venting episodes associated with liquids unloading, wellbore depressurization in preparation for maintenance or repair, hydrate clearing, emergency operations, equipment depressurization, etc. emissions shall be minimized to the extent practicable. During manual blow down/venting, qualified personnel shall remain on site to ensure minimal gas venting occurs.
- Records of automated and manual episodes must be maintained and include:
  - Regulated pollutants
  - Reasons for episodes
  - Duration of episodes
  - Steps taken to minimize emissions
  - Explanation of how emissions were estimated

# Tentative Schedule



- Comments due back to WYDEQ through PAW by 1/25/2010.
- WYDEQ plans to go before the Environmental Quality Council for approval at the end of 2/2010
- Implementation for all new spud dates (new facilities) and modification dates after 7/1/2010.