

PETROLEUM RESOURCE MANAGEMENT

1580 N. Lincoln St., Ste 635, Denver, CO 80203
Phone (303) 861-9480 / petromgt@att.net

October 28, 2019

Colorado Department of Public Health and Environment
Air Pollution Control Division
4300 Cherry Creek Drive South /APCD-SS-B1
Denver, CO 80246-1530

**Subject: Welba Peak Unit, WPU-36-1V-H2
Petroleum Resource Management Corporation
General Permit (GP-09) Application Package**

To Whom It May Concern:

Petroleum Resource Management Corporation (PRM) is submitting with this letter the enclosed General Permit GP-09 application package for the Welba Peak Unit WPU-36-1V-H2 oil and gas well production Facility, located at Lot 19 Section 36, Township 11 North, Range 89 West in Moffat County, Colorado. This facility is in wildcat status and additional productivity testing is needed to prove the well and the resource. Based on review of the new GP-09 permitting mechanism and with guidance from CDPHE (communication with Stephanie Spector on October 25, 2019), we believe the GP-09 is appropriate and well-suited to this circumstance, as it was designed as a temporary authorization to allow companies time to determine potential to emit (PTE) emissions for subsequent construction permit application(s). PRM is therefore submitting the enclosed GP-09 application in compliance with Colorado Air Quality Control Commission (AQCC) Regulation Number 3, Part A, Section II, which provides:

II.D.1.III. Oil and gas exploration and production operations (well site and associated equipment) shall provide written notice to the Colorado Oil and Gas Conservation Commission of proposed drilling locations prior to commencement of such operations. Air Pollutant Emission Notices are not required until after exploration and/or production drilling, workovers, completions, and testing are finished.

If production will result in reportable emissions, the owner or operator shall file an Air Pollutant Emission Notice with the Division within thirty days after the well completion or recompletion report and log is filed with the appropriate state or federal agency. If production will not occur, or production will not result in reportable emissions, the owner or operator shall submit written notice to the Division indicating that the well was plugged, or that emissions are otherwise not reportable. If production will result in reportable emissions, the owner or operator shall file an Air Pollutant Emission Notice with the Division within

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thirty days after the report of first production is filed with the appropriate state or federal agency but no later than ninety days following the first day of production.

AQCC Reg. 3, Pt. A. Sect. II.D.1. III (emphasis added).

As discussed with Ms. Stephanie Spector of your office, this well is co-located with two other wells, a vertical well and a horizontal well that were drilled and tested for productivity, but then plugged and abandoned. The remaining current horizontal well (H-2) which is the subject of the enclosed application has been drilled and completed, and was also the subject of some initial productivity testing earlier this year through portable equipment, but that testing is insufficient to prove the well and resource, so PRM intends to commence additional productivity testing under the requested GP-09 permit. And although stationary equipment has been constructed at the site (separator, tanks, combustor) based on the earlier limited testing of the H-2 well, no production into that stationary equipment has occurred to date (and so no emissions have occurred from it), though it will be utilized to handle production from the productivity testing under the requested GP-09 permit.

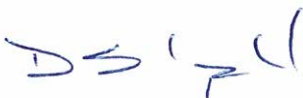
Due to the change in permitting tools available, and given the need for additional productivity testing of the H-2 well, PRM is also requesting concurrent cancellation of permits previously obtained for the constructed stationary emissions points:

Source	AIRS ID	Permit Authorization
High Pressure Separator Gas Venting	081/0588/001	18MF0689.CP1
Condensate Tank Battery	081/0588/002	GP-08 Approval #399594
Produced Water Tank Battery	081/0588/003	GP-05 Approval #383255

Enclosed is a check for \$2000.00 in full payment of the General Permit GP-09 registration fee. In addition, the Company Contact Information, Facility Emissions Inventory Form, Well Production Facility Registration Form, Emission Calculations, Regulatory Analysis, and Cancellation Requests are also enclosed.

Please let me know if you need any additional information. If you should have any questions please contact me at 303-861-9480, or by email at petromgt@comcast.net. You may also contact our consultant, Lori Marquez at 303-503-4735, or by email at LMarquez@Barr.com.

Sincerely,



Duncan Shepherd
President

Attachments

1. General Permit Fees
2. APCD Form 101 - Company Contact Information
3. APCD Form 102 – Facility Emissions Inventory Form
4. APCD Form 114 – Well Production Facility Registration Form
5. Emission Calculations
6. Regulatory Analysis
7. Cancellation Requests

Attachment 1:
General Permit Filing Fees

CARMONY EXPLORATION, LLC
LEASING ACCOUNT
2838 CRATER LAKE LN. PH. 303-604-6618
LAFAYETTE, CO 80026-3487

23-2/1020



1077

10/25 2019

Pay To The Order Of COLORADO DEPT. OF PUBLIC HEALTH & ENVIRON \$ 2000 ⁰⁰/₁₀₀
Two thousand dollars and no/100 Dollars Security Features Included. Details on Back.

US BANK

For Perm. Fee 10/09

MP

SAFETY CHECK

⑆ 10 200002 ⑆ 103674350436 ⑆ 1077

Attachment 2:
APCD Form 101
Company Contact Information



Company Contact Information Form

Ver. September 10, 2008

Company Name: Petroleum Resource Management Corp.
Source Name: Welba Peak Unit WPU-36-1V-H2

Permit Contact¹:	Duncan Shepherd		
Address:	1580 Lincoln St., Ste 635		
	Street		
	Denver	CO	80203
	City	State	Zip
Phone Number:	(303) 861-9480		
Fax Number:			
E-mail:	petromgt@comcast.net		

Compliance Contact²:	Duncan Shepherd		
Address:	1580 Lincoln St., Ste 635		
	Street		
	Denver	CO	80203
	City	State	Zip
Phone Number:	(303) 861-9480		
Fax Number:			
E-mail:	petromgt@comcast.net		

Billing Contact: <i>(Permit Fees)³</i>	Duncan Shepherd		
Address:	1580 Lincoln St., Ste 635		
	Street		
	Denver	CO	80203
	City	State	Zip
Phone Number:	(303) 861-9480		
Fax Number:			
E-mail:	petromgt@comcast.net		

Billing Contact: <i>(Annual Fees)⁴</i>	Duncan Shepherd		
Address:	1580 Lincoln St., Ste 635		
	Street		
	Denver	CO	80203
	City	State	Zip
Phone Number:	(303) 861-9480		
Fax Number:			
E-mail:	petromgt@comcast.net		

Check how would you like to receive your permit fee invoice?

 Mail: ☒

 E-mail: ☐

 Fax: ☐

Footnotes:

- ¹ The permit contact should be the point of contact for technical information contained in the permit application. This may be a company representative or a consultant.
- ² The compliance contact should be the point of contact for discussing inspection and compliance at the permitted facility.
- ³ The billing contact (Permit fees) should be the point of contact that should receive the invoice for fees associated with processing the permit application & issuing the permit. (Reg. 3, Part A, Section VI.B)
- ⁴ The billing contact (Annual fees) should be the point of contact that should receive the invoices issued on an annual basis for fees associated with actual emissions reported on APENs for the facility. (Reg. 3, Part A, Section VI.C)

Attachment 3:
APCD Form 102
Facility Wide Emissions Inventory Form

Attachment 4:
APCD Form 114
Well Production Facility Registration



Well Production Facility Registration Form APCD-114

Application for General Permits GP09 and GP10

All sections of this form and application must be completed for new facilities. Incomplete forms will be rejected and will require re-submittal. *Your form will be rejected if it is filled out incorrectly, is missing information, or lacks payment for the general permit registration fee.* If rejected, the re-submittal will require payment of a new registration fee.

This form may be used only for registering well production facilities under general permits GP09 or GP10. A current copy of this general permit application form may be found on the Air Pollution Control Division (APCD) website.

Submission of equipment-specific APENs is required no later than ninety (90) days following the first day of production. See Regulation No. 3, Part A, Section II for APEN requirements and Regulation No. 3, Part B for permit requirements.

Facility AIRS ID Number : 081 / 0588

[Leave blank unless APCD has already assigned an AIRS ID]

Section 1 - Administrative Information

Company Name¹: Petroleum Resource Management Corp.

Site Name: Welba Peak Unit WPU-36-1V-H2

Site Location: Lot 19 Sec 36 T11N R89W

Site Location
County: Moffat

NAICS or SIC Code: 21120

Mailing Address: 1580 Lincoln St., Ste 635
(Include Zip Code) Denver, CO 80203

Contact Person: Duncan Shepherd

Phone Number: (303) 861-9480

E-Mail Address²: petromgt@comcast.net

¹ Use the full, legal company name registered with the Colorado Secretary of State. This is the company name that will appear on all documents issued by the APCD. Any changes will require additional paperwork.

² The general permit registration approval letter and any processing invoices will be issued by the APCD via e-mail to the address provided.

Section 2 - Geographical Information

Include geographical information for the well production facility.

Geographical Coordinates:
(Latitude/Longitude or UTM)

40.860331, -107.325012



Section 3 - Requested Action

Request registration under General Permit.³ <input checked="" type="checkbox"/> GP09 <input type="checkbox"/> GP10	Request appropriate permit action. <input checked="" type="checkbox"/> Initial Request <input type="checkbox"/> Modification <input type="checkbox"/> Transfer of Ownership
---	---

The General Permit registration fee of \$2,000.00 must be submitted with this form.

Additional Information and Notes:

³ Upon registration, general permits GP09 and GP10 both provide temporary permit coverage for commencement of construction and start of operations at well production facilities.

Section 4 - Facility Classification

Review the non-attainment map to determine whether this facility is located in the ozone attainment or non- attainment area, which can be found on the APCD website.

Will this facility be located within any NAAQS ozone non-attainment area?

☐ Yes ☒ No

Is this facility defined as a well production facility per the definition contained in Regulation No. 7, Section XVII.A.18?

☒ Yes ☐ No

Section 5 - Well Production Facility Information

List the wells serviced by this well production facility. Include additional pages as needed.

API Number	Name of Well	API Number	Name of Well
05-081-07799-02	WPU-36-1V-H2		

Section 6 - Field Operations Information

Projected date of drilling first well: 01/01/2016

Projected commencement of operation date: 11/01/2019

Section 7 - Applicant Certification

I hereby certify that all information contained herein, including the emission unit and limits specified in the addendum below, and information submitted with this application is complete, true, and correct. As this application represents a registration for coverage under General Permit GP09 or GP10, I further certify that this source is and will be operated in full compliance with each condition of the applicable General Permit.

DS / PC

10/28/19

Signature of Legally Authorized Person (not a vendor or consultant)

Date

Duncan Shepherd

President

Name (printed)

Title

Send this form along with the General Permit registration fee of \$2,000.00 to:

Colorado Department of Public Health and Environment
Air Pollution Control Division
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530

For more information or assistance call:

Small Business Assistance Program
(303) 692-3175 or (303) 692-3148

OR

APCD Main Phone Number
(303) 692-3150

Make check payable to:

Colorado Department of Public Health and Environment



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Well Production Facility Registration Requested Permit Limits Addendum Application for General Permits GP09 and GP10

Section 1 – Administrative Information

Company Name: Petroleum Resource Management Corp.

Facility AIRS ID: 081 / 0588

County: Moffat

Facility Name: Welba Peak Unit WPU-36-1V-H2

Facility Location: Lot 19 Sec 36 T11N R89W

Permit Type:
☒ GP09 ☐ GP10

Section 2 –Emission Units

List all emission units to be registered to this general permit. Include information describing the equipment (i.e. number/size of storage vessels, make/model/size of engines, etc.). Repeat and attach additional pages as needed.

Emission Unit Type	Emission Unit Description	Emissions Unit Type		Emission Unit Description
		10	--	
1	Crude Oil Storage Tank	8 x 400 bbl Tanks	--	
2	Produced Water Storage Tank	3 x 500 bbl Tanks	--	
3	Hydrocarbon Liquid Loading	Oil unloading from tanks to trucks	--	
4	Separator	High Pressure Gas Venting	--	
5	--		--	
6	--		--	
7	--		--	
8	--		--	
9	--		--	

Section 3 - Emission Units and Requested Permit Limits

List all emission units to be covered by this permit, including the projected requested permitted emission and process limit as well as the control equipment or methods used to meet the limits specified. The information included in this table will be considered an enforceable permit limit for each piece of equipment listed below. Repeat and attach additional pages as needed.

Emissions Unit Type	Requested Annual Permitted Process Limit (include units)	Requested Annual Permitted Emission Limits (tons per year)					Control Equipment Description (Enter N/A if not utilized)	Control Efficiency (%)		
		PM2.5	PM10	SO2	NOX	VOC		NOX	VOC	CO
1 Crude Oil Storage Tank	180,000 (bbl/yr)				2.0	45.0	Enclosed Combustor(95%)	0%	90%	0%
2 Produced Water Storage Tank	40,000 (bbl/yr)				0.0	0.2	Enclosed Combustor(95%)	0%	90%	0%
3 Hydrocarbon Liquid Loading	180,000 (bbl/yr)				0.0	2.5	Vapor Balance(66.5%)	0%	70%	0%
4 Separator	270 (MMscf/yr)				13.5	41.5	Enclosed Combustor(98%)	0%	90%	0%
5 --								0%	0%	0%
6 --								0%	0%	0%
7 --								0%	0%	0%
8 --								0%	0%	0%
9 --								0%	0%	0%
10 --								0%	0%	0%
11 --								0%	0%	0%
12 --								0%	0%	0%
13 --								0%	0%	0%
14 --								0%	0%	0%
15 --								0%	0%	0%
16 --								0%	0%	0%
17 --								0%	0%	0%
18 --								0%	0%	0%
Total Requested Permitted Emissions:		0.0	0.0	0.0	15.5	89.2				

VOC
95%
95%
66.5%
98%



Attachment 5:
Emission Calculations

WPU-36-1V-H2**Flare Detail Sheet****PTE Emission Calculations: Separator Venting to Flare**

Equipment ID	FLR-01	Potential Operation	8760	hr/yr
Source Description	Produced Gas Flare (Separator Flare)	Stack Height	20	ft
Destruction Efficiency*: 98%				

*Destruction efficiency will be confirmed through testing.

Total Flare Emissions Summary

Pollutant	Produced Gas at Separator			Controlled Produced Gas Flaring		
	Estimated Emissions		Annual lb/yr	Estimated Emissions		Annual lb/yr
	Hourly (lb/hr)	Annual (tpy)		Hourly (lb/hr)	Annual (tpy)	
PM/PM10/PM2.5	0	0		7.60	1.03	
SO2	0	0		0.60	0.08	
NOx	0	0		100.01	13.53	
VOC	7.66	2073.29		0.15	41.47	
CO	0	0		84.01	11.37	
Benzene	0.01	1.47	2,949	0.00	0.03	58.98
Toluene	0.00	0.49	984	0.00	0.01	19.68
Ethylbenzene	0.00	0.01	25	0.00	0.00	0.50
Xylenes	0.00	0.07	143	0.00	0.00	2.87
n-Hexane	0.04	11.22	22,437	0.00	0.22	448.74
224-TMP	0.01	1.93	3,858	0.00	0.04	77.16
Total HAPs	0.06	15.15	30,303	0.00	0.30	606.1

Pilot Stream Heat

Pilot Fuel Type	Field Gas
Gas Heating Value*	1,286.12 Btu/scf (From gas analysis)
Pilot Rating	0.10 MMBtu/hr
Pilot Rating	876.0 MMBtu/yr
Pilot Flow Rate	0.000078 MMscf/hr
Pilot Flow Rate	0.6811 MMscf/yr
Sulfur Content	2,000 grains S/MMscf (sampling shows 0.8 ppm sulfur)

Pilot Stream Emissions

Pollutant	Emission Factor (lb/MMscf)	Estimated Emissions		Source of Emission Factor
		Hourly (lb/hr)	Annual (tpy)	
PM/PM10/PM2.5	7.60	0.00059	0.00259	AP-42 Table 1.4-2
SO2	0.60	0.00005	0.00020	AP-42 Table 1.4-2
NOx	100.000	0.00778	0.03406	AP-42 Table 1.4-2
CO	84.00	0.00653	0.02861	AP-42 Table 1.4-2

Standard Conversions

379.4 scf/lb-mol @ stp
28.3168 L / scf
453.59 g / lb

Produced Gas Stream

Gas Heating Value*	1286.1 Btu/scf (From Promax analysis)
Max hourly heat input	1286.1 MMBtu/hr
Annual heat input	347252.4 MMBtu/yr
Max Hrly Throughput	1 MMscf/hr
Annual Gas Flow Rate	270 MMscf/yr
Sulfur Content	2,000 grains S/MMscf (sampling shows 0.8 ppm sulfur)

Produced Gas Stream Emissions

Pollutant	Emission Factor (lb/MMscf)	Estimated Emissions		Source of Emission Factor
		Short Term Max (lb/hr)	Annual (tpy)	
PM/PM10/PM2.5	7.60	7.600	1.026	AP-42 Table 1.4-2
SO2	0.60	0.600	0.081	AP-42 Table 1.4-2
NOx	100.000	100.000	13.500	AP42 Table 13.5-1
CO	84.00	84.000	11.340	AP42 Table 13.5-2

Sample Calculations

$0.68 \text{ MMscf/hr} * 100.000 \text{ lb/MMscf} * 8760 \text{ hr/yr} / 2000 \text{ lb/ton} = 0.034 \text{ tpy NOx}$

WPU-36-1V-H2
Flare Detail Sheet
PTE Emission Calculations: Separator Venting to Flare

Equipment ID	FLR-01	Potential Operation	8760	hr/yr
Source Description	Produced Gas Flare (Separator Flare)	Stack Height	20	ft
Destruction Efficiency*: 98%				

*Destruction efficiency will be confirmed through testing.

Mass Balance Calculation for VOC

					Combined Max hourly 1.0 MMscf/hr		Pilot 0.7 MMscf/yr		Produced Gas 270 MMscf/yr	
					Uncontrolled	Controlled	Uncontrolled	Controlled	Uncontrolled	Controlled
<i>Gas Composition</i>					lb/hr	lb/hr	TPY	TPY	TPY	TPY
Carbon Dioxide	44.01	3.35%	1.48	6.45%	1.945	1.945	1.325	1.325	525.166	525.166
Nitrogen	28.01	0.39%	0.11	0.47%	0.143	0.143	0.097	0.097	38.482	38.482
Methane	16.04	70.96%	11.38	49.73%	15.002	0.300	10.217	0.204	4050.256	81.005
Ethane	30.07	13.59%	4.09	17.86%	5.387	0.108	3.669	0.073	1454.325	29.086
Propane	44.10	7.86%	3.47	15.14%	4.568	0.091	3.111	0.062	1233.242	24.665
Isobutane	58.12	0.83%	0.48	2.10%	0.634	0.013	0.432	0.009	171.233	3.425
n-Butane	58.12	2.07%	1.20	5.26%	1.586	0.032	1.080	0.022	428.199	8.564
Isopentane	72.15	0.35%	0.25	1.09%	0.329	0.007	0.224	0.004	88.885	1.778
n-Pentane	72.15	0.37%	0.26	1.15%	0.348	0.007	0.237	0.005	93.921	1.878
i-Hexanes	86.18	0.08%	0.07	0.31%	0.094	0.002	0.064	0.001	25.378	0.508
n-Hexane	86.16	0.04%	0.03	0.14%	0.041	0.001	0.028	0.001	11.190	0.224
Benzene	78.11	0.01%	0.00	0.02%	0.005	0.000	0.004	0.000	1.471	0.029
Cyclohexane	84.16	0.01%	0.01	0.04%	0.013	0.000	0.009	0.000	3.447	0.069
i-Heptanes	100.21	0.02%	0.02	0.08%	0.025	0.001	0.017	0.000	6.872	0.137
n-Heptane	100.21	0.004%	0.00	0.02%	0.006	0.000	0.004	0.000	1.502	0.030
Toluene	92.14	0.001%	0.00	0.01%	0.002	0.000	0.001	0.000	0.491	0.010
224-TMP	114.23	0.005%	0.01	0.02%	0.007	0.000	0.005	0.000	1.924	0.038
n-Octane	114.23	0.0003%	0.00	0.00%	0.001	0.000	0.000	0.000	0.137	0.003
Ethylbenzene	106.17	0.0000%	0.00	0.00%	0.000	0.000	0.000	0.000	0.012	0.000
m-Xylene	106.16	0.0001%	0.00	0.00%	0.000	0.000	0.000	0.000	0.025	0.000
p-Xylene	106.16	0.0001%	0.00	0.00%	0.000	0.000	0.000	0.000	0.025	0.001
o-Xylene	106.16	0.0001%	0.00	0.00%	0.000	0.000	0.000	0.000	0.021	0.000
Nonanes	128.2	0.0002%	0.00	0.00%	0.000	0.000	0.000	0.000	0.083	0.002
n-Decane	142.29	0.00003%	0.00	0.000%	0.000	0.000	0.000	0.000	0.013	0.000
Undecanes	156.31	0.000002%	0.00	0.000%	0.000	0.000	0.000	0.000	0.001	0.000
Dodecanes	170.33	0.0000002%	0.00	0.000%	0.000	0.000	0.000	0.000	0.000	0.000
Tridecanes	184.37	0.00000005%	0.00	0.000%	0.000	0.000	0.000	0.000	0.000	0.000
Tetradecanes Plus	198.39	0.00000002%	0.00	0.000%	0.000	0.000	0.000	0.000	0.000	0.000
Water	34	0.07%	0.02	0.100%	0.030	0.001	0.021	0.000	8.132	0.163
Total		100.00%	22.89	100.00%	30.167	2.649	20.546	1.804	8144.435	715.264
VOC		11.64%	5.81	25.39%	7.66	0.15	5.22	0.10	2068.07	41.36
Total HAPs		0.05%	0.042	0.19%	0.056	0.001	0.038	0.001	15.113	0.302

* Estimated throughput is based on Promax simulation of separator overheads. It is requested that the permit reflect the emissions limits shown only.

Petroleum Resource Management Corp
Facility: WPU-36-1V-H2
PTE Emission Calculations: Oil and Produced Water Tanks

Facility Throughput

Oil Tanks	180,000 bbl/yr	Projected with margin
	493.2 bbl/day	
Produced Water:	40,000 bbl/yr	Projected with margin
	109.6 bbl/day	
Combustor Control Efficiency	95%	

Uncontrolled Emissions

Emission Unit Number	Description	Quantity	Tank Capacity (bbl)	Total Capacity (bbl)	VOC Emission Factor ^{1,2} (lb/bbl)	Uncontrolled VOC Emissions (tpy)	Benzene Emission Factor (lb/bbl)	Uncontrolled Benzene Emissions (tpy)	n-hexane Emission Factor (lb/bbl)	Uncontrolled n-hexane Emissions (tpy)
TK-01 - TK-08	Oil Storage Tanks	8	400	3200	10	900.00	0.048	4.32	0.14	12.60
PWTK-01 - PWTK03	Water Storage Tanks	3	500	1500	0.178	3.56	0.004	0.08	0.01	0.200
				Total		903.56		4.40		12.80

1 - Emission factors for oil tanks taken from page 9 of CDPHE PS Memo 05-01, dated May 1, 2017 for sites in Moffat County.
2 - Emission factors for produced water tanks taken from page 7 of CDPHE PS Memo 09-02 dated May 1, 2017 for sites in Moffat County.

Controlled Emissions

Emission Unit Number	Description	Quantity	Total Capacity (bbl)	VOC Emissions (tpy)	Benzene Emissions (tpy)	n-hexane Emissions (tpy)	Per Tank VOC Emissions (tpy)	Per Tank Benzene Emissions (tpy)	Per Tank n-hexane Emissions (tpy)
TK-01 - TK-08	Oil Storage Tanks	8	400	45.00	0.22	0.63	5.63	0.03	0.08
PWTK-01 - PWTK03	Water Storage Tanks	3	500	0.18	0.00	0.01	0.06	0.00	0.00

Petroleum Resource Management Corp
Facility: WPU-36-1V-H2
PTE Emission Calculations: Oil Loading

Emission Unit ID:	L-1 Oil Loading			
Description:	Oil Loadout			
Throughput (bbl/yr)	180,000	7,560,000	gal/yr	
Saturation Factor, S*	0.6			
Vapor Pressure, P (psia) **	2.8			Capture Efficiency
Vapor Molecular Weight, M (lb/lb-mol) **	50			Control Efficiency
Liquid Temperature, T (°F)	60			70.00%
Liquid Temperature, T (°R)	520			95.00%

* From AP-42 Table 5.2-1, for tank trucks in submerged loading: dedicated normal service
** From AP42 Table 7.1-2, Crude Oil (RVP 5), 60 deg

Loading Loss (lb VOC/1000 gal) = (12.46*S*P*M)/T AP42 Section 5.2 (1/95)

Loading Loss (lb VOC/1000 gal) = 2.01

Pollutant	Loading Loss lb/1000 gal	Throughput gal/yr	Emissions (Uncontrolled)		Emissions (Collected)		Emissions (Controlled)		Uncollected Loading Fugitive Emissions		Total	
			lb/yr	TPY	lb/yr	TPY	lb/yr	TPY	lb/yr	TPY	lb/yr	TPY
VOC	2.01	7,560,000	15216.54	7.61	10651.57	5.33	532.58	0.27	4564.96	2.28	5097.54	2.55
Benzene	0.011	7,560,000	86.52	0.04	60.56	0.03	3.03	0.00	25.96	0.01	28.98	0.01
Toluene	0.041	7,560,000	312.60	0.16	218.82	0.11	10.94	0.01	93.78	0.05	104.72	0.05
Ethylbenzene	0.004	7,560,000	31.52	0.02	22.07	0.01	1.10	0.00	9.46	0.00	10.56	0.01
n-Hexane	0.061	7,560,000	464.57	0.23	325.20	0.16	16.26	0.01	139.37	0.07	155.63	0.08
Xylenes	0.043	7,560,000	328.34	0.16	229.84	0.11	11.49	0.01	98.50	0.05	109.99	0.05
2,2,4-TMP	0.010	7,560,000	74.97	0.04	52.48	0.03	2.62	0.00	22.49	0.01	25.12	0.01
Methanol	0.00	7,560,000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

HAPS Speciation *

Analyte	Mass %
Benzene	0.57%
Toluene	2.05%
Ethylbenzene	0.21%
Xylenes	2.16%
n-Hexane	3.05%
2,2,4-TMP	0.49%
Methanol	0.00%

* Speciation from liquid analysis

Petroleum Resource Management Corp**Facility: WPU-36-1V-H2****PTE Emission Calculations: Tank and Oil Loading Combustion**

Equipment Source Name	COMB-1	
Source Description	Tank and Loadout Combustor	
Input Sources		
Stack Height	20 ft	Estimate of Volume
Quantity	1	908.89 TPY total uncontrolled tank and loadout emissions
Operating Hours per year	8760	66 Vapor MW lb/lb-mol for RVP10
Destruction Efficiency	95%	379.4 scf/lb-mol
Gas Heating Value *	3,867 BTU/scf	0.50 margin
Waste Gas Flow Rate **	0.043 MMscfd	15.67 MMSCF/yr
Heat Input (average)	6.92 MMBtu/hr	

Tons per Year (tpy) Emissions

Pollutant	Emission Factors ***	Estimated Emissions	
		(lb/hr)	(tpy)
NO _x ****	0.068 lb/MMBtu	0.471	2.061
CO ****	0.31 lb/MMBtu	2.145	9.395
VOC	Shown on Tank Emissions Sheet		
SO ₂	0.6 lb/MMscf	0.001	0.0047
PM10	7.6 lb/MMscf	0.014	0.060

Notes:

* - Gas heating value is from gas analysis.

** - Gas Flow rate estimated based on uncontrolled tank emissions.

*** Emission factors are from AP-42 Tables 13.5-1, 13.5-2, and AP-42 Table 1.4-2

SO₂ emissions based on 100% conversion of sulfur to SO₂ at 2000 grains/MMscf.

**** Hourly Emission Rate (lb/hr) = (Emission Factor, lb/MMBtu) * (Heat Input, MMBtu/hr)

Petroleum Resource Management Corp
Facility: WPU-36-1V-H2
PTE Emission Calculations: Water Loading

Emission Unit ID: L-2 Water Loading
Description: Water Loadout

Throughput (bbl/yr)	40,000
Saturation Factor, S*	0.6
Vapor Pressure, P (psia) **	2.8
Vapor Molecular Weight, M (lb/lb-mol) **	50
Liquid Temperature, T (°F)	60
Liquid Temperature, T (°R)	520

* From AP-42 Table 5.2-1, for tank trucks in submerged loading: dedicated normal service
** From AP42 Table 7.1-2, Crude Oil (RVP 5), 60 deg

Loading Loss (lb VOC/1000 gal) = (12.46*S*P*M)/T AP42 Section 5.2 (1/95)

Loading Loss (lb VOC/1000 gal) = 2.01

Produced Water Loading Losses 0.02 lb/1000 gallons percent oil in water: 1%

Pollutant	Loading Loss lb/1000 gal	Throughput gal/yr	Emissions lb/yr	TPY
VOC	0.02	1,680,000	33.81	0.02
Benzene	0.000	1,680,000	0.19	0.00
Toluene	0.000	1,680,000	0.69	0.00
Ethylbenzene	0.000	1,680,000	0.07	0.00
n-Hexane	0.001	1,680,000	1.03	0.00
Xylenes	0.000	1,680,000	0.73	0.00
2,2,4-TMP	0.000	1,680,000	0.17	0.00
Methanol	0.00	1,680,000	0.00	0.00

HAPS Speciation *

Analyte	Mass %
Benzene	0.57%
Toluene	2.05%
Ethylbenzene	0.21%
Xylenes	2.16%
n-Hexane	3.05%
2,2,4-TMP	0.49%
Methanol	0.00%

* Speciation from liquid analysis

Petroleum Resource Management Corp
Facility: WPU-36-1V-H2
PTE Emission Calculations: Fugitive VOC Emissions

Equipment ID FUG-01
Source Description Fugitives
Potential operation 8760 hr/yr

Potential Emissions				
Pollutant	Estimated Emissions (lb/hr)	Source Count	Weight Percent VOC	Source of Emission Factor
VOC	0.03	0.15		EPA-453/R-95-017, Table 2-8
Total HAPs	0.00	0.01		

Calculation Methodology				
Equipment Type	Emission Factor* (kg/hr/source)	Source Count	Weight Percent VOC	VOC Emission Rate (tpy)
Valves-Gas/Vapor	2.50E-05	84	100.00%	0.0203
Valves-Light Liquid	1.90E-05	115	100.00%	0.0211
Relief Valves-Gas/Vapor	1.20E-04	15	100.00%	0.0174
Open-Ended Lines-Gas/Vapor	1.50E-05	21	100.00%	0.0030
Open-Ended Lines-Light Liquid	1.40E-05	0	100.00%	0.0000
Connectors-Gas/Vapor	1.00E-05	412	100.00%	0.0398
Connectors-Light Liquid	9.70E-06	150	100.00%	0.0140
Other Components-Light Liquid	1.10E-04	23	100.00%	0.0244
Flanges-Light Liquid	2.40E-06	230	100.00%	0.0053
Total-Gas/Vapor				0.08
Total-Light Liquid				0.06
Total				0.15

*Component emission rates from EPA's Oil and Gas Production Operations average equipment leak emission factors (EPA 453/R-95-017 dated November 1995) Table 2-8.

HAP's	Component	Wt%	lb/hr	ton/yr	lb/yr
BZ	0.57%	0.00	0.00	0.00	1.65
Tol	2.05%	0.00	0.00	0.00	5.97
EB	0.21%	0.00	0.00	0.00	0.60
Xyl	2.16%	0.00	0.00	0.00	6.27
n-Hex	3.05%	0.00	0.00	0.00	8.88
2,2,4-TMP	0.49%	0.00	0.00	0.00	1.43

Note: HAP speciation based on representative liquids analysis.

Equipment Type	Wellhead	Separator	Heater Treater	Header	Meters, Piping	Comprs	In-Line Heater	Dehys	Oil/Water Tanks	Total
Equipment Count	1	1	0	12	1	0	1	0	11	NA
Light Crude - Count per unit*										
Valve	5	6	8	5					4	115
Flanges	10	12	12	10					8	230
Connectors	4	10	20	4					8	150
Open-Ended Lines	0	0	0	0					0	0
Other Components	1	0	0	0					2	23
Gas - Count per unit*										
Valve	11	34	34		14	73	14	24	1	84
Connectors	36	106	106		51	179	65	90	14	412
Open-Ended Lines	1	6	6		1	3	2	2	1	21
Pressure Relief Valves	0	2	2		1	4	1	2	1	15

*Component counts from 40 CFR 98 Subpart W, Table W-1C and W-1B, Western U.S. Oil tank component counts are estimated.

Sample Calculation
0.00000 kg/hr-source * 0 Sources * 0.00000 VOC wt% * 2.204 lb/kg * (kg/hr/source) hr/yr / 2000 lb/ton = 0.00000 tpy

Attachment 6:
Regulatory Analysis

REGULATORY ANALYSIS

1.0 Federal Regulations

New Source Review Permitting (NSR)

Prevention of Significant Deterioration (PSD)

The Federal New Source Review (NSR) Prevention of Significant Deterioration (PSD) program applies to new or modified sources in both attainment and non-attainment areas that result in emissions in excess of specified thresholds. Total potential emissions of any criteria pollutant from this facility will be less than 250 tons per year (tpy) and the facility is not one of the 26 named PSD source categories. In addition, the facility is located in an area designated as unclassified/attainment for all criteria pollutants. Therefore, the facility is not subject to PSD or non-attainment NSR permitting programs.

Title V Operating Permits

Sources are required to obtain a Part 70 Title V Operating Permit if they are a major source of emissions. A major source is defined as a stationary source that emits or has the potential to emit greater than 10 tpy of any single hazardous air pollutant (HAP), 25 tpy of total HAPs, or 100 tpy of any criteria air pollutant in an area designated as attainment. Potential emissions projections for this facility are less than major source thresholds. Therefore, the facility is not subject to Title V Operating Permit requirements.

New Source Performance Standards (NSPS)

The facility includes sources which may be subject to NSPS Requirements included in Title 40 of the Code of Federal Regulations (CFR) Part 60. A review of each potentially applicable subpart is included below.

Subpart A

Subpart A General Provisions apply to any stationary source that contains an affected facility to which an NSPS standard is applicable. This subpart applies if at least one NSPS standard is applicable.

Subpart Dc

Subpart Dc applies to heating units with a heat capacity greater than 10 MMBtu/hr. There are no heating units with a heat capacity of 10 MMBtu/hr or greater at the facility. Therefore, this facility is not subject to 40 CFR 60.40c.

Subpart Kb

Subpart Kb applies to pre-custody transfer tanks with a capacity greater than 10,000 bbl (1,589.874 m³). All of the tanks at this facility are pre-custody transfer and have a capacity less than the threshold. Therefore, this facility is not subject to 40 CFR 60.110b.

Subpart IIII

Subpart IIII applies to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE). There are no compression ignition internal combustion engines at this facility. Therefore, this facility is not subject to 40 CFR 60.4200.

Subpart JJJJ

Subpart JJJJ applies to manufacturers, owners and operators of stationary spark ignition (SI) internal combustion engines (ICE). There are no stationary SI ICE at the facility. Therefore, this facility is not subject to 40 CFR 60.4230.

Subpart OOOO

Subpart OOOO applies to facilities constructed after August 23, 2011 and on or before September 18, 2015. This facility was constructed after September 18, 2015. Therefore, the facility is not subject to 40 CFR 60.5365 or 40 CFR 60.5370-5430.

Subpart OOOOa

Subpart OOOOa applies to each storage vessel affected facility, each pneumatic controller affected facility, each compressor affected facility, and each pneumatic pump affected facility constructed, modified or reconstructed after September 18, 2015. This subpart also applies to the collection of fugitive emission components at a well site that were constructed, modified, or reconstructed after September 18, 2015.

The storage tanks at this facility were constructed, modified or reconstructed after September 18, 2015. The potential to emit, as defined by this subpart, of the produced water tank is less than or equal to 6 tpy, per tank, based on current projections. The potential to emit of the oil tanks are less than 6 tpy, per tank, with enforceable controls based on current projections. Therefore, the produced water and oil tanks are not an affected facility as defined in 40 CFR 60.5365a (e) and are not subject to 40 CFR 60.5395a.

There are no centrifugal compressors, reciprocating compressors, continuous high-bleed pneumatic controllers or pneumatic pumps at the facility. Therefore the facility is not subject to 40 CFR 60.5380a, 60.5385a, 60.5390a or 60.5393a.

The fugitive emission components at this well site are constructed or modified after September 18, 2015. Therefore, the fugitive emission components will be subject to the monitoring requirements in 40 CFR 60.5397a.

**National Emission Standards for Hazardous Air Pollutants (NESHAP)
Maximum Achievable Control Technology (MACT)****Subpart HH – Oil and Gas MACT**

Subpart HH applies to emission points at oil and natural gas production facilities. The facility emissions are below major source thresholds for HAPs, and there are no triethylene glycol (TEG) dehydration units at this facility. Therefore, there are no requirements for this facility under 40 CFR 63.760.

Subpart ZZZZ – RICE MACT

Subpart ZZZZ applies to new or reconstructed stationary reciprocating internal combustion engines located at major and area sources of HAP emissions. This facility is an area source of HAP emissions, however there are no engines at this facility. Therefore this facility is not subject to this subpart as defined in 40 CFR 63.6585.

Subpart DDDDD – Heater and Boiler MACT

Subpart DDDDD applies to new or reconstructed boilers or process heaters located at a major source of HAP emissions. This facility is an area source of HAP emissions. Therefore this facility is not subject to this subpart as defined in 40 CFR 63.7485.

2.0 State Regulations**Regulation 1 (5 CCR 1001-3) Emission Control for Particulate Matter, Smoke, Carbon Monoxide and Sulfur Oxides****Section II. Smoke and Opacity (II.A.1)**

No owner or operator of a source should allow or cause the emission into the atmosphere of any air pollutant that is in excess of 20% opacity. This standard is based on 24 consecutive opacity readings taken at 15-second intervals for six minutes. The facility will comply with the requirements of this regulation.

Section II. Smoke and Opacity (II.A.5)

No emission from a smokeless flare or flare for the combustion of waste gases shall be in excess of 30% opacity for a period of six minutes in any sixty consecutive minutes. The facility will comply with the requirements of this regulation.

Section III-Particulate Matter (III.D.2.a)

The general requirements of this portion of the regulation apply to unpaved roadways which has vehicle traffic exceeding 200 vehicles per day. This facility is not expected to have vehicle traffic exceeding 200 vehicles per day and is therefore not subject to these requirements.

Regulation 2 (5 CCR 1001-4) Odor

CDPHE Regulation 2 (5 CCR 1001-4 Part A.1) States ‘No person, wherever located, shall cause or allow the emission of odorous air contaminants from any single source such as to result in detectable odors which are measured in excess of the following limits...’. The facility is subject to this regulation and will comply with its requirements.

Regulation 3 (5 CCR 1001-5) Stationary Source Permitting**Part A, Section II**

Regulation 3, Part A, Section II describes when an Air Pollutant Emission Notice (APEN) must be submitted for new, modified, and existing sources. Sources with criteria pollutant emissions greater

than or equal to two tons per year in an attainment area must report emissions to the APCD through the submission of an APEN in accordance with the schedule in Section II.D.1.III. The facility is in compliance with the applicable sections of Regulation 3 Part A with the submittal of this application and any previous applications and permits.

Part B

Regulation 3, Part B describes the requirements for Construction Permits. The facility is in compliance with the applicable sections of Regulation 3 Part B with the submittal of this application and any previous applications and permits.

Part C

Regulation 3, Part C describes the requirements for Operating Permits. This facility is a minor source based on current projected potential to emit and does not require an Operating Permit.

Part D

Regulation 3, Part D describes the requirements for major stationary source new source review and prevention of significant deterioration. This facility is not subject to new source review.

Regulation 6 (5 CCR 1001-8) Standards of Performance for New Stationary Sources

Regulation 6 incorporates by reference the EPA's New Source Performance Standards (NSPS). NSPS applicability is discussed in Section 1.0.

Regulation 7 (5 CCR 1001-9) Emissions of Volatile Organic Compounds and Nitrogen Oxides

Section XVII

Regulation 7, Section XVII describes the statewide requirements for oil and gas operations and natural gas-fired reciprocating internal combustion engines. This section applies to atmospheric storage tanks, glycol natural gas dehydrators, and natural gas fired reciprocating internal combustion engines. Storage tanks, dehydrators and internal combustion engines that are subject to an emissions control requirement in a Federal Maximum Achievable Control Technology (MACT) standard under 40 CFR Part 63, a Best Available Control Technology (BACT) limit, or a New Source Performance Standard (NSPS) under 40 CFR Part 60 are not subject to this Section XVII.

Section XVII.C – Storage Tanks

The oil storage tanks meet the definition in XVII.A.16. Each tank will have uncontrolled actual volatile organic compound (VOC) emissions greater than 6 tons per year (tpy). Therefore, the oil storage tanks are subject to this regulation. Atmospheric storage tanks with uncontrolled actual VOC emissions of equal to or greater than six tpy based on a rolling twelve-month total are required to operate air pollution control equipment that has an average control efficiency of at least 95% for VOCs. If a combustion device is used, it must have a design destruction efficiency of at least 98% for hydrocarbons. The oil tank battery emissions will be routed to an enclosed combustor (COMB-1) with a design destruction efficiency of 98%. A 95% control efficiency credit was applied to comply with this regulation. AVO and Visual Inspections will be conducted according to the schedule and

requirements found in XVII.C.1.d. A Storage Tank Emission Management (STEM) plan will be developed in accordance with the schedule found in XVII.C.2.b.(ii) to meet the “operate without venting” standard.

The produced water storage tanks meet the definition in XVII.A.16. These tanks will have uncontrolled actual VOC emissions less than 6 tons per year (tpy); therefore, the produced water tanks are not subject to this regulation. However, the tanks will be controlled by an enclosed combustor.

Section XVII.D - Glycol Dehydration Units

Regulation 7, Section XVII.D describes emission reduction requirements from natural gas dehydrators. There are no glycol dehydration units at this facility. Therefore Regulation 7, Section XVII.D does not apply to this facility.

Section XVII.E - Control of emissions from new, modified, existing, and relocated natural gas fired reciprocating internal combustion engines

Regulation 7, Section XVII.E describes emission control requirements for reciprocating internal combustion engines. There are no internal combustion engines at this facility. Therefore Regulation 7, Section XVII.E does not apply to this facility.

Section XVII.F - Leak Detection and Repair (LDAR) for well production facilities and natural gas compressor stations

Regulation 7, Section XVII.F describes leak detection and repair (LDAR) monitoring requirements. The oil storage tank battery will have uncontrolled actual VOC emissions greater than 50 tpy. Therefore, a monthly leak detection and repair test using an approved instrument monitoring method will be performed. LDAR and AVO tests will be performed in accordance with the phase-in schedule found in Table 4 of XVII.F.4.

Regulation 8 (5 CCR 1001-10) Control of Hazardous Air Pollutants

Regulation 8 incorporates by reference the EPA’s National Emission Standards for Hazardous Air Pollutants (NESHAPs). NESHAP applicability is discussed in Section 1.0.

Colorado Oil & Gas Conservation Commission (COGCC) 805 Series Requirements

COGCC Regulation 805(b)(2) addresses facilities that are located within ¼ mile of a building unit, educational facility assembly building, hospital, nursing home, board and care facility, jail or designated outside activity area. This facility is located within ¼ mile of potential receptors and, as such, is subject to this regulation. An emission control device for the oil tanks capable of achieving 95% control efficiency of VOC will be utilized in compliance with this rule.

Attachment 7: Forms APCD-107
Cancellation Forms



Emissions Permit/APEN Cancellation Request – Form APCD-107

Air Pollution Control Division
Stationary Sources Program

All sections of this Emissions Permit/APEN Cancellation Request must be completed for any request to cancel an Emissions Permit or APEN and submitted to the Colorado Department of Public Health and Environment's Air Pollution Control Division (APCD). A cancellation request with missing information may be determined incomplete and may be returned or result in a longer cancellation processing time.

Section 1 - Administrative Information

Please note, specific facility information needed for this section can be found on your facility's emissions permit on the bottom left corner of each page, in the facility's emissions permit equipment description(s), or on your most recent Annual Emission Fee Invoice.

AIRS ID(s): 081/0588/001 Permit Number(s): 18MF0689.CP1
Equipment Description: Gas Venting From High Pressure Separator
Owner or Operator of Permit: Petroleum Resource Management Corporation
Facility or Equipment Address: Welba Peak Unit WPU-36-1V
Lot 19 Sec 36 T11N R89W
Permit Contact: Duncan Shepherd
Mailing Address: 1580 Lincoln St., Ste 635
Denver, CO 80203
Phone Number: (303) 861-9480 Email Address: petromgt@comcast.net
Date Facility or Equipment Ceased or Went Below Reporting Thresholds: Did / Not / Operate

Section 2 - Reason for Emissions Permit/APEN Cancellation

- ☒ The facility or equipment addressed by the permit or APEN no longer exists.
☐ The facility or equipment has been sold to another party and I do not wish to transfer the permit.
☐ The facility or equipment has dropped below reporting thresholds.
☐¹ The permit was previously required *solely* because the emissions unit was subject to NSPS or MACT/NESHAP requirements that were adopted into Colorado Regulations (see PS Memo 14-01 for more info). This cancellation request is for (check appropriate box):
☐ Permit Only (The unit is still active. The permit will be cancelled, but the APEN will remain active because emissions are above APEN-reporting thresholds. The emissions unit is now subject to one of the general exemption letters found on the following page of the APCD website: <https://www.colorado.gov/pacific/cdphe/air-permitting-cancellation-exempt-sources>)
☐ Permit & APEN (Both the permit and the APEN will be cancelled. The unit is still active, but emissions are below APEN-reporting thresholds.)

¹ Please review the information on the following page of the APCD website before selecting this option:

<https://www.colorado.gov/pacific/cdphe/air-permitting-cancellation-exempt-sources>

Section 3 - Owner or Operator Certification

I have reviewed this cancellation request in its entirety and I hereby certify that all information contained herein is true, accurate, and complete.

Duncan Shepherd
Signature of Legally Authorized Person (not a vendor or consultant)

10/28/19
Date

Duncan Shepherd
Name (please print)

President
Title

Send completed form to:

CDPHE - Air Pollution Control Division
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530

Telephone: (303) 692-3150

For more information or assistance call:

Small Business Assistance Program
(303) 692-3175 or (303) 692-3148

Or visit the APCD website at:

<https://www.colorado.gov/pacific/cdphe/apcd>



Emissions Permit/APEN Cancellation Request – Form APCD-107

Air Pollution Control Division
Stationary Sources Program

All sections of this Emissions Permit/APEN Cancellation Request must be completed for any request to cancel an Emissions Permit or APEN and submitted to the Colorado Department of Public Health and Environment's Air Pollution Control Division (APCD). A cancellation request with missing information may be determined incomplete and may be returned or result in a longer cancellation processing time.

Section 1 - Administrative Information

Please note, specific facility information needed for this section can be found on your facility's emissions permit on the bottom left corner of each page, in the facility's emissions permit equipment description(s), or on your most recent Annual Emission Fee Invoice.

AIRS ID(s): 081/0588/002 Permit Number(s): GP08 Approval Package #399594
Equipment Description: Condensate Tank Battery
Owner or Operator of Permit: Petroleum Resource Management Corporation
Facility or Equipment Address: Welba Peak Unit WPU-36-1V
Lot 19 Sec 36 T11N R89W
Permit Contact: Duncan Shepherd
Mailing Address: 1580 Lincoln St., Ste 635
Denver, CO 80203
Phone Number: (303) 861-9480 Email Address: petromgt@comcast.net
Date Facility or Equipment Ceased or Went Below Reporting Thresholds: Did / Not / Operate

Section 2 - Reason for Emissions Permit/APEN Cancellation

- ☒ The facility or equipment addressed by the permit or APEN no longer exists.
☐ The facility or equipment has been sold to another party and I do not wish to transfer the permit.
☐ The facility or equipment has dropped below reporting thresholds.
☐¹ The permit was previously required *solely* because the emissions unit was subject to NSPS or MACT/NESHAP requirements that were adopted into Colorado Regulations (see PS Memo 14-01 for more info). This cancellation request is for (check appropriate box):
☐ Permit Only (The unit is still active. The permit will be cancelled, but the APEN will remain active because emissions are above APEN-reporting thresholds. The emissions unit is now subject to one of the general exemption letters found on the following page of the APCD website: <https://www.colorado.gov/pacific/cdphe/air-permitting-cancellation-exempt-sources>)
☐ Permit & APEN (Both the permit and the APEN will be cancelled. The unit is still active, but emissions are below APEN-reporting thresholds.)

¹ Please review the information on the following page of the APCD website before selecting this option:

<https://www.colorado.gov/pacific/cdphe/air-permitting-cancellation-exempt-sources>

Section 3 - Owner or Operator Certification

I have reviewed this cancellation request in its entirety and I hereby certify that all information contained herein is true, accurate, and complete.

Duncan Shepherd

10/28/19

Signature of Legally Authorized Person (not a vendor or consultant)

Date

Duncan Shepherd
Name (please print)

President
Title

Send completed form to:

CDPHE - Air Pollution Control Division
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530

Telephone: (303) 692-3150

For more information or assistance call:

Small Business Assistance Program
(303) 692-3175 or (303) 692-3148

Or visit the APCD website at:

<https://www.colorado.gov/pacific/cdphe/apcd>



Emissions Permit/APEN Cancellation Request – Form APCD-107

Air Pollution Control Division
Stationary Sources Program

All sections of this Emissions Permit/APEN Cancellation Request must be completed for any request to cancel an Emissions Permit or APEN and submitted to the Colorado Department of Public Health and Environment's Air Pollution Control Division (APCD). A cancellation request with missing information may be determined incomplete and may be returned or result in a longer cancellation processing time.

Section 1 - Administrative Information

Please note, specific facility information needed for this section can be found on your facility's emissions permit on the bottom left corner of each page, in the facility's emissions permit equipment description(s), or on your most recent Annual Emission Fee Invoice.

AIRS ID(s): 081/0588/003 Permit Number(s): GP05 Approval Package #383255
Equipment Description: Produced Water Tank Battery
Owner or Operator of Permit: Petroleum Resource Management Corporation
Facility or Equipment Address: Welba Peak Unit WPU-36-1V
Lot 19 Sec 36 T11N R89W
Permit Contact: Duncan Shepherd
Mailing Address: 1580 Lincoln St., Ste 635
Denver, CO 80203
Phone Number: (303) 861-9480 Email Address: petromgt@comcast.net
Date Facility or Equipment Ceased or Went Below Reporting Thresholds: Did / Not / Operate

Section 2 - Reason for Emissions Permit/APEN Cancellation

- ☒ The facility or equipment addressed by the permit or APEN no longer exists.
☐ The facility or equipment has been sold to another party and I do not wish to transfer the permit.
☐ The facility or equipment has dropped below reporting thresholds.
☐¹ The permit was previously required *solely* because the emissions unit was subject to NSPS or MACT/NESHAP requirements that were adopted into Colorado Regulations (see PS Memo 14-01 for more info). This cancellation request is for (check appropriate box):
☐ Permit Only (The unit is still active. The permit will be cancelled, but the APEN will remain active because emissions are above APEN-reporting thresholds. The emissions unit is now subject to one of the general exemption letters found on the following page of the APCD website: <https://www.colorado.gov/pacific/cdphe/air-permitting-cancellation-exempt-sources>)
☐ Permit & APEN (Both the permit and the APEN will be cancelled. The unit is still active, but emissions are below APEN-reporting thresholds.)

¹ Please review the information on the following page of the APCD website before selecting this option:

<https://www.colorado.gov/pacific/cdphe/air-permitting-cancellation-exempt-sources>

Section 3 - Owner or Operator Certification

I have reviewed this cancellation request in its entirety and I hereby certify that all information contained herein is true, accurate, and complete.

Duncan Shepherd
Signature of Legally Authorized Person (not a vendor or consultant)

10/28/19
Date

Duncan Shepherd
Name (please print)

President
Title

Send completed form to:

CDPHE - Air Pollution Control Division
APCD-SS-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530

Telephone: (303) 692-3150

For more information or assistance call:

Small Business Assistance Program
(303) 692-3175 or (303) 692-3148

Or visit the APCD website at:

<https://www.colorado.gov/pacific/cdphe/apcd>