



April 3, 2018

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**Re: GPA Midstream Response to EPA Questions on GPA Midstream OOOOa
White Paper Supplemental Information**

Dear David,

Thank you for taking the time to speak with us a couple weeks ago. Below is the follow-up information we discussed.

Questions directed to all companies:

- Are the surveys done internally or contracted out?
 - Company 1
 - All are contracted out
 - Company 2
 - Mix of both
 - Company 3
 - Sites A-LL: Internal
 - M21 Sites: Contracted out
 - Company 4
 - CO Sites: Contracted out
 - OH Sites: Mix of both
- Are weather parameters available for the monitoring events?
 - Company 1
 - No, data not required
 - Company 2
 - No, data not required
 - Company 3:
 - Sites A-LL: Yes but data has not been compiled

- M21: No, data not required
 - Company 4:
 - No, data not required
- What is the general production at the site? What are the operating modes of the units?
 - Company 1
 - The sites are operating
 - Company 2
 - Unavailable
 - Company 3:
 - Unavailable
 - Company 4:
 - The surveys were conducted at active compressor stations with operating compressors. The operating mode of each compressor during the survey, but it is reasonable to conclude that the leaking components surveyed were under full (operating) or partial (standby) pressure.
- What program was the site monitoring for?
 - Company 1
 - Complying with NSPS KKK as was required by WY
 - Company 2
 - CO Reg 7
 - Company 3
 - Sites A-LL: NSPS OOOOa
 - M21 Sites: Texas, Non-rule standard permit requirements
 - Company 4
 - CO Sites: CO Reg 7
 - OH Sites: Requirement in OH operating permit
- Where are the sites located?
 - Company 1
 - Located in WY
 - Company 2
 - Located in CO
 - Company 3:
 - Listed on Excel sheet
 - Company 4
 - Station A-Q: CO
 - Stations R-V: OH
- What are the ages of the site?
 - Company 1
 - Site 1: Approx. 20 years old
 - Site 2: Approx. 12 years old
 - Site 3: Approx. 20 years old
 - Site 4: Approx. 13 years old

- Company 2
 - Ranges from less than 1 year to over 40 years
- Company 3:
 - Unknown
- Company 4
 - CO Sites: They were all built between 2001 to 2010
 - OH Sites: They were all built between 2013 to 2017
- What was the monitoring method?
 - Company 1
 - Method 21
 - Company 2
 - All OGI
 - Company 3
 - Sites A-LL: OGI
 - M21 Sites: Method 21
 - Company 4
 - All OGI

Company specific Questions

Company 2:

- Why is there a spike in March of 2016?
 - Unknown
- Is Reg 7 Monitoring on a calendar or rolling basis?
 - There is no minimum time between monitoring events. For example, for quarterly monitoring, you just have to monitor in each quarter of the year

Company 3:

- For the M21 sites, why do the component counts fluctuate so much?
 - The Non-Rule Standard Permit requires quarterly monitoring of accessible valves as well as pump and compressor seals. Annual monitoring is required for DTM valves. Frequently, component totals are split by thirds to monitor components monthly. In addition, flange and connectors were also monitored annually. The component counts also fluctuated when units, such as compressors, were temporarily out of service during the monitoring.
- Is there a reason that the overall leak % for the M21 sites is higher than others?
 - The leak rate should not be looked at on a monthly basis since components are split up between months and quarters making a monthly or even quarterly leak rate a little harder to compare on months where only a few components were

monitored. A more accurate representation would be to look at annual leak rate, which shows a much lower leak rate.

Thank you once again for your time. Please let me know if we can be of any further help. If you have any questions, please contact me at (202) 279-1664 or by email at Mhite@GPAmidstream.org.

Sincerely,

Matthew Hite
Vice President of Government Affairs
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