

Oil & Gas Exploration & Production Public Comments

Name	Date	Message	Document Item
Renee Lewis	7/13/2007	If "many companies BMPs in place already," then why does a mandatory approach to BMPs seem implausible. This should be a cost of doing business in this area; a cost that is well-absorbed by most other companies.	2 - Mitigation Option: Best Management Practices (BMPs) for Operating Tank Batteries
Dennis Casto	6/29/2007	VRU's have one big technical problem not addressed, the introduction of air in the gas. Air is made up of Nitrogen and Oxygen two contaminants that the gas pipeline companies refuse to take into their system. If one VRU allows air to enter the gas system, then the whole gas system must be shut down or flared in the field. The gas companies must be forced to take air in reasonable quantities into their system. The gas pipelines will argue that it is unsafe, if that is true then all the gas supplying houses in the Colorado front range must be shutdown because air is added to improve quality.	3 - Mitigation Option: Installing Vapor Recovery Units
Dennis Casto	6/29/2007	In the 60's and 70's this type of water removal was tried in the northern Rockies. The amount of saltwater disposal was huge and the beds may only last a day or two before they must be changed.	6 - Dehydrators / Separators / Heaters
Dennis Casto	6/30/2007	Glycol pumps are a critical item and any replacement system must have a high reliability. 5KW generators will had NOx, CO, CO2 and decrease reliability. Kimray pumps with flash gas separators reduce emissions and keep the system reliable. the gases recovered from the pump gas separator can be used for fuel MOST of the time. In some cases where the gas stream is high in liquefiable hydrocarbons (those with molecular weights higher than 40) the pump gas separator vapors will not burn reliably or completely cause unreliable operators and increased emissions. In the case of gases with high liquefiable content, vent gases need to be flared (burned).	10 - Mitigation Option: Zero Emissions (a.k.a. Quantum Leap) Dehydrator
Southern Ute Growth Fund	7/11/2007	We strongly agree that an initial voluntary monitoring effort, followed by mandatory reporting and monitoring requirements, should be initiated by the operators to measure concentrations and species of VOCs and HAPs and other flaring by-products.	11 - Mitigation Option: Venting versus Flaring of Natural Gas during Well Completions
Southern Ute Growth Fund	7/11/2007	We strongly agree that co-location and centralization of new oil/gas field facilities should be voluntarily implemented by operators. We also agree with the approach of state and federal agencies and mineral management agencies proactively integrating this approach into planning and permitting processes.	12 - Mitigation Option: Co-location / Centralization for New Sources
Dennis Casto	6/29/2007	The present laws will not allow this option. TEG (glycol) units must be permitted at a maximum rate. In the Rockies the maximum rate is only required for a few months during the year. Good operators adjust their pumps as needed to save fuel and lower emissions, but they get not credit for doing so because their permits are set. GLYCALC uses all kinds of default assumptions, this does not replace good engineering and the ability to make real life adjustments. Other design and simulation programs should be allowed without any legal ramifications.	13 - Mitigation Option: Control Glycol Pump Rates
Southern Ute Growth Fund	7/11/2007	Mitigation option is both economically feasible and environmentally beneficial, as a result we strongly agree with their implementation.	13 - Mitigation Option: Control Glycol Pump Rates

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Southern Ute Growth Fund	7/11/2007	Mitigation option is both economically feasible and environmentally beneficial, as a result we strongly agree with their implementation.	18 - Mitigation Option: Convert High-Bleed to Low or No Bleed Gas Pneumatic Controls
Southern Ute Growth Fund	7/11/2007	Mitigation option is both economically feasible and environmentally beneficial, as a result we strongly agree with their implementation.	22 - Mitigation Option: Optical Imaging to Detect Gas Leaks
Dennis Casto	6/30/2007	Instrument gas or instrument air is used to control facilities. These controls maintain the emission control system, gas quality controls and safety shutdown systems. If the instruments air/gas system lacks sufficient quantity and quality, the controls will fail and emissions, quality and safety devices can fail with undesirable results. At small and remote sites air compressors will be unreliable and gas must be used.	23 - Mitigation Option: Convert Gas Pneumatic Controls to Instrument Air