

From: [Methanestrategy, NM, NMENV](#)
To: [Kuehn, Elizabeth, NMENV](#)
Subject: Fw: Draft VOC Rule Question
Date: Friday, September 4, 2020 10:41:24 AM
Attachments: [image003.jpg](#)

From: Pye Russell <prussell@mjbradley.com>
Sent: Thursday, August 6, 2020 12:00 PM
To: Methanestrategy, NM, NMENV
Subject: [EXT] Draft VOC Rule Question

Hello,

I have a clarifying question on the draft oil and gas VOC rule I was hoping someone could help with. The stripper well and low-PTE exemptions are clear in how they apply to wells (based on production) and gathering and boosting, processing, and transmission sources (based on <15 tpy pte). I was uncertain on how the low-PTE requirement would be applied to standalone tank batteries (not located at a wellhead), which are subject to LDAR requirements regardless of potential annual VOCs. It seems that a tank battery could therefore meet the definition of a low-PTE source but still be subject to the LDAR requirement (which have thresholds well below 15 tpy pte). My understanding is that for other non-wellhead sources, the LDAR requirement (quarterly for <25 tpy and monthly for = 25) effectively kicks in at 15 tpy pte, as anything below that would fall into the low-PTE definition. I appreciate any information you can provide to clarify.

Regards,
Pye

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