RESOLVED COMPLAINTS:

SUBJECT: scheduled inspection and records review

DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

11010101000		
FACILITY: LINN Operating INC - E Albert 13 CPF (Sage Creek)		SRN / ID: N6151
LOCATION: SE4 NE4 NW4 T29N R2E SEC 13, ALBERT TWP		DISTRICT: Gaylord
CITY: ALBERT TWP		COUNTY: MONTMORENCY
CONTACT: Diane Lundin, Senior EHS Representative		ACTIVITY DATE: 10/12/2015
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT

On October 12, 2015, AQD Staff traveled to N6151 Linn Energy (formerly HighMount) Sage Creek CPF located in Albert Township, Montmorency County for a Full Compliance Evaluation (FCE) to determine compliance with PTI 710-96. PTI 710-96 is MOGA and an Opt-Out permit.

The facility was signed as follows: Linn Operating LLC Sage Creek Production Facility, SE/SE/NW Section 13 T29N R2E, in case of Emergency call 231-922-7303.

AQD Staff Gloria Torello and Becky Radulski were present at the inspection.

DEQ Inspection brochures have been previously emailed to Linn Energy.

LOCATION

N615131800

The facility is located in Albert Township, Montmorency County, SE of Atlanta. From M-32 go south on M-33 to Harwood Rd, turn east. Facility is at intersection of Harwood and Sage Creek Roads. The gate was locked with a padlock that has a 4 digit number combination on bottom to open the lock.

EQUIPMENT ON SITE

There was 1 engine onsite - a Caterpillar 3512 LE Engine - lean burn, no control. Also onsite was also a dehy and a lined tank farm containing 1 400 bbl tank labeled 'brine' and a smaller tank, approximately 300 bbl.

REGULATORY DISCUSSION

The engine is subject to 40 CFR Part 63, Subpart ZZZZ, which has not been delegated to MDEQ from EPA.

The glycol dehydration system is subject to 40 CFR Part 63, Subpart HH, which also has not been delegated to MDEQ from EPA.

INSPECTION NOTES

There is one large building on site with the engine. The stack from the engine was located at ground level. The horizontal portion of the stack was encompassed with dirt, pipe, most likely serving to reduce noise. No VE or odor noted. No stack size requirements in this PTI.

rpm	1134
engine oil temperature	185 F
engine oil pressure	60 psi

Several oil, used oil, and glycol related tanks/drums were located outside the building in a covered and

contained structure. As mentioned above, there was also a lined containment with 2 tanks onsite – 1 400 bbl brine, 1 smaller (approximately 300) bbl tank.

RECORDS REVIEW

PTI 710-96 is a MOGA permit. The engine onsite did not have a a catalytic convertor, therefore the facility is not required to maintain an approved PM-MAP.

The Special Conditions (SC) of the permit are as follows:

SC 13/15. CO, VOC and NOx shall not exceed 89 tons/yr rolling. 12 Month rolling records provided are: CO 8.82 tpy, NOx 11.02 tpy, VOC 2.65 tpy, under the permitted limits. Emission factors are listed in the table and have no issues.

SC 14/15 HAPS - HAPS were reported by the facility as TEG (tri ethylene glycol), less than 1 pound monthly. Ethylene glycol is on CAA list of HAPS.

SC 16, fuel consumption was provided (approximately 3.8 MMcf/month), crude oil/condensate thruput (0 bbls), glycol circulated through dehydrator (0.12 average) in Appendix A format.

SC 19, There facility is not required to have an approved PM-MAP. However maintenance records were request and provided, no issues noted.

SC 20/22 - specific conditions for crude oil/condensate. As indicated in SC 16, there is no crude oil / condensate at this facility.

SC 21 - air pollution control device hours of operation. There is no control device so this condition does not apply.

SC 23 - stack test if requested by AQD. No test has been requested by AQD.

SC 24 - process only sweet natural gas. The facility confirmed that they operate with only sweet natural gas.

There are no stack height requirements in the permit.

MAERS

The 2016 submittal will be reviewed during the 2016 MAERS season. See MAERS for details.

MACES

MACES Facility and Regulatory screens were reviewed. The facility information and regulatory summary screens were updated.

COMPLIANCE DETERMINATION

Based on the scheduled inspection, N6151 Linn Energy Sage Creek CPF appears to be in compliance with PTI 710-96.

NAME Becky Radulski

DATE /1-12-15

SUPERVISOR