



Laurel Mountain Midstream, LLC
1605 Coraopolis Heights Road
Moon Township, PA 15108
(412) 865-2141
(412) 865-1754 FAX

February 10, 2012

Ms. Joyce Epps
Director
Bureau of Air Quality
Pennsylvania Department of Environmental Protection
Rachel Carson State Office Building
12th Floor
P.O. Box 8468
Harrisburg, PA 17105-8468



Re: Initial Notification Concerning Source Reports and Annual Air Emissions Inventories

Dear Ms. Epps:

On December 6, 2011, the Pennsylvania Department of Environmental Protection (DEP) notified some owners and operators engaged in natural gas development activities in the Commonwealth of Pennsylvania that emissions inventory reports must be submitted to the DEP by March 1, 2012. These reports are to represent emissions from the period January 1 to December 31, 2011. Laurel Mountain Midstream, LLC (LMM) received such a letter on January 23, 2012, allowing a 60 day time period to report (March 18, 2012).

Since the initial notification to the Oil and Gas Industry, LMM has participated in conversations with officials at the Southwest Regional Office of the Pennsylvania DEP, separate conversations with the Air Subcommittee of the Marcellus Shale Coalition regarding the content and format of the required reports and the PADEP sponsored Webinar on February 6th. This has given the LMM a better understanding of the detailed requirements and how they will facilitate the reporting process into the future. Until receipt of this letter, LMM did not believe that they would be part of this process for CY 2011. Further, we anticipate that retrospectively developing data for the 2011 reporting period will be difficult.

As you know, it is highly unusual for reporting of this nature to be requested after the reporting period has passed. To allow more time to gather data and to ensure the quality of the data, we request that the deadline for submitting the 2011 inventory reports be extended to July 1, 2012. We believe an extension is appropriate in this inaugural year of the program and request that extension.

The justification for this request is based on several factors:

Ms. Joyce Epps
Director
Bureau of Air Quality
February 6, 2012

1. This is the first year of the program and as such, the systems are not yet established to respond to the request. In fact the DEP's electronic system just became available February 1st and the initial training session was just held February 6th. This leaves only a few weeks, at most, for newly trained personnel to collect, analyze, and report the required data; insufficient time for a request of this magnitude. (See attached; LMM will be reporting on 20 sites.)
2. The acquisition of retrospective data will require more time and effort than a "go forward" process in which the reporting requirements have been clearly defined in advance.
3. There are numerous aspects of the inventory reporting that depend on key parameters. There are several methods available to estimate these key parameters and LMM would like time to review these to determine our best practices for emissions calculation methodologies. These would be clearly defined in our submissions.
4. It may be necessary to conduct additional work to verify results. Such work could involve several months of data acquisition and analysis. This would improve the quality of 2011 data submissions and it would improve the process for future reporting years.
5. We have a small staff, and even with contractor support, it will fall on existing staff to verify calculation methods and the input data. Also, contractor availability will be in short supply and will thus make it difficult to provide the required reports by March 18. By extending the deadline, our staff can put their resources to work more effectively and improve the quality of their reports.

In summary, LMM believes an extension to July 1, 2012 will provide a more achievable deadline, will result in better quality data and will therefore provide a more accurate picture of air emissions from LMM operations in Pennsylvania. LMM remains committed to working with the DEP to ensure that the air emission inventory reporting meets your requirements. Please contact me at my office phone at 412-865-2175 or my cell phone at 412-328-6347 if you would like to discuss this in more detail.

Yours Very Truly,



Richard (Dick) Baker, P.E.
Senior Environmental Specialist
Laurel Mountain Midstream

Attachment

Copy: Dan Haney, Operations Chief, SW Regional Office, PADEP
Barbara Hatch, Environmental Engineering Manager, SW Regional Office, PADEP

Ms. Joyce Epps
Director
Bureau of Air Quality
February 6, 2012

Stations Included in this request are:

- Brown Compressor Station
- Ceylon Compressor Station
- Clyde Compressor Station
- Davis Compressor Station
- Dunbar Compressor Station
- Herminie Compressor Station
- Howser Compressor Station
- Hurtt Compressor Station
- Jackson Center Compressor Station
- Joseph Compressor Station
- Lake Wilhelm Compressor Station
- Prah Compressor Station
- Pritts Compressor Station
- Robin Hill Gas Plant
- Salem Compressor Station
- Shamrock Compressor
- Springhill Compressor Station
- Stewart Gas Plant
- Townville Compressor Station
- Union City Compressor Station