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RE: [EXTERNAL] Information Request; Question about 200 H2S emission factor; Hilcorp's Monopod Platform; AQ0067TVP04A

From Jeanette Brena <jbrena@boreal-services.com>

Date Tue 12/3/2024 1:17 PM

To Klina, Joshua J (DEC) <joshua.klina@alaska.gov>

Cc Drew Anderson <ananderson@hilcorp.com>; Francesca Risse - (C) <Francesca.Risse@hilcorp.com>

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Hello Joshua,

For SO₂ emissions from gas-fired emissions units, the Monopod Title V application used 200 ppmv H₂S as a conservative estimate based on the annual average of 5 years of data (2018 – 2022). The application was submitted in January 2023, so 2023 data was not yet analyzed – however, I included the values below for comparison. I also highlighted (red) the maximum H₂S values that you were pulling from the FORs. As you can see, the annual average (2018-2022) is 168 ppmv; if I use a more recent 5-year period, the annual average (2019-2023) is 164 ppmv.

| 2023 | 2022 | 2021 | 2020 | 2019 | 2018 |
|------|------|------|------|------|------|
| 75 | 50 | 175 | 120 | 200 | 100 |
| 70 | 400 | 250 | 85 | 140 | 90 |
| 50 | 150 | 125 | 80 | 250 | 60 |
| 70 | 200 | 150 | 90 | 200 | 75 |
| 600 | 400 | 130 | 50 | 200 | 160 |
| 20 | 130 | 200 | 100 | 200 | 125 |
| 50 | 80 | 60 | 150 | 150 | 200 |
| 120 | 400 | 400 | 350 | 200 | 150 |
| 10 | 100 | 110 | 350 | 110 | 100 |
| 40 | 100 | 400 | 153 | 150 | 100 |
| 100 | 70 | 250 | | 100 | 120 |
| 100 | 189 | 125 | | 173 | 200 |
| 109 | | 198 | | | 200 |
| | | | | | 129 |

Five Year Average (2018-22) **168**

Five Year Average (2019-23) **164**

Please let me know if this answers your question.

Thanks!

Jeanette Brena, P.E.

Principal Engineer



B O R E A L

Mobile: (907) 227-5569

Email: jbrena@boreal-services.com

Address: 4300 B Street, Suite 510, Anchorage, AK 99503

From: Drew Anderson <ananderson@hilcorp.com>
Sent: Tuesday, December 3, 2024 12:05 PM
To: Jeanette Brena <jbrena@boreal-services.com>; Francesca Risse - (C) <Francesca.Risse@hilcorp.com>
Subject: FW: [EXTERNAL] Information Request; Question about 200 H2S emission factor; Hilcorp's Monopod Platform; AQ0067TVP04A

Jeanette,

Can you answer Joshua's question below?

Thank you,
Drew

From: Klina, Joshua J (DEC) <joshua.klina@alaska.gov>
Sent: Tuesday, December 3, 2024 11:29 AM
To: Drew Anderson <ananderson@hilcorp.com>
Subject: [EXTERNAL] Information Request; Question about 200 H2S emission factor; Hilcorp's Monopod Platform; AQ0067TVP04A

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Dear Drew Anderson,

I am writing this information request regarding Hilcorp's application for a Title V renewal for the Monopod Platform (AQ0067TVP04A).

In the PTE calculations submitted, for EU IDs 1 – 7 and 17 – 20, sulfur emissions are calculated using an emission factor of 200 ppmv H2S. Footnote 2 in the "SO2" page of the PTE calculations states that the emission factor, 200 ppmv H2S, is used as a conservative estimate based on an average of the past 5 years of H2S concentration data. Looking through the Facility Operating Reports (FORs) for the years 2019 through 2023, I have found the following reported H2S concentrations: 250 ppmv for 1H2019, 200 ppmv for 2H2019, 120 ppmv for 1H2020, 350 ppmv for 2H2020, 250 ppmv for 1H2021, 400 ppmv for 2H2021, 400 ppmv for 1H2022, 400 ppmv for 2H2022, 600 ppmv for 1H2023, and 120 ppmv for 2H2023. These values have an average of 309 ppmv H2S.

Would Hilcorp be able to provide the data referenced in Footnote 2 that led to an emission factor of 200 ppmv H2S being used for EU IDs 1 – 7 and 17 – 20?

I've attached a copy of the PTE calculations submitted by Hilcorp for your reference. Please let me know if anything in this information request was unclear.

Thanks,

Joshua Klina
Alaska Dept. of Environmental Conservation
Engineering Assistant II
joshua.klina@alaska.gov

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