

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Self Initiated Inspection

U13141262127848

FACILITY: West Bay Exploration - Mullett CPF		SRN / ID: U131412621
LOCATION: , Marshall		DISTRICT: Kalamazoo
CITY: Marshall		COUNTY: CALHOUN
CONTACT: Tim Baker , Operations Manager		ACTIVITY DATE: 10/28/2014
STAFF: Rex Lane	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Self Initiated Inspection		
RESOLVED COMPLAINTS:		

On October 28, 2014, Air Quality Division (AQD) staff (Rex Lane) arrived at West Bay Exploration Company (WBECO) – Mullett Central Processing Facility (CPF) located in Lee Township, Calhoun County (Section 23; T1S R5W) to conduct an unannounced air quality inspection. CPF means production equipment which has been consolidated at a central location that provides for commingling of oil or gas production, or both, from 2 or more wells. This CPF commenced operations in July 2007 and collects sweet crude oil and natural gas from area wells drilled into the Traverse formation. There was no WBECO staff present on-site during the inspection. There were several contractors on-site during the inspection servicing facility equipment. Mr. David Bechler, MDEQ, Office of Oil, Gas and Minerals assisted AQD staff on the inspection.

This facility has six horizontal heater/treaters that separate natural gas and water from the crude oil. Once separated, the crude oil and water are sent to one of six 400 barrel (16,800 gallon capacity each) vertical above ground storage tanks. Natural gas liquids (NGL) are transferred to a 30,000 gallon horizontal above ground storage tank. There are no open flares or glycol dehydrators at this facility. The oil storage tanks are exempt from Permit to Install (PTI) requirement per Rule 284(e). The NGL storage tank is exempt from PTI requirements per Rule 284(b). The heater/treater process equipment is exempt from PTI requirement per Rule 288(d). There was one compressor engine [Arrow Model No. VRG260/A42] present that is exempt from PTI requirements pursuant to Rule 285(g) based on information provided by WBECO's consultant following the inspection. The compressor engine is rated at 47 Bhp (equivalent to 0.36 MMBtu/hr.; based on conversion factor 2,546.7 Btu/HP-HR and an assumed thermal efficiency of 33%) and is subject to 40 CFR Part 63, Subpart ZZZZ for reciprocating internal combustion engines. The AQD has not taken delegation authority from USEPA for this federal regulation at area sources of Hazardous Air Pollutants, therefore, staff did not evaluate compressor engine compliance with 40 CFR Part 63, Subpart ZZZZ. The manufacture date for the Arrow compressor engine is not known by the owner/operator. If the engine manufacture date were determined to be after June 12, 2006, the compressor engine would also be subject to federal regulation under 40 CFR Part 60, Subpart JJJJ.

At the time of the inspection, it appears that the WBECO – Mullett CPF was in compliance with all applicable state air quality rules and regulations. -RIL

NAME RIL DATE 11/24/14 SUPERVISOR MA 11/24/2014