



November 22, 2023

James E. Locke
Director, Air Quality
CNX
1000 CONSOL Energy Drive
Canonsburg, PA 15317-6506

Re: RFD-65-01137
Mamont Flowback and Produced Water Impoundment
Bell Township, Westmoreland County
APS # 1080672; Auth # 142650; PF # 735870

Dear Mr. Locke:

After review, the Department of Environmental Protection (Department) has determined that installation and operation of the CNX Gas Company LLC, Mamont Impoundment is exempt from Plan Approval/Operating Permit requirements per 25 Pa. Code §127.14(d) listed as No. 44 in the Department's Air Quality Permit Exemptions (275-2101-003, July 1, 2021) under 25 Pa. Code §127.14(a)(8). The basis for this decision is the conformance of the impoundment to Paragraph 38(c), c., ii. (Page 12), with the exception that the impoundment is not located at an oil or gas well pad, as required by this exemption.

This determination and subsequent authorization are based on the RFD-65-01137 submission dated February 1, 2023, notifying the Department of this physical change and de minimis emission increase. From your submittal, the Department understands that:

1. The impoundment stores both flowback and produced water. The liquids may be received or distributed by truck or pipeline. It will have an approximate capacity of 880,000 barrels (37 million gallons) and a throughput of 10 million barrels per year. Fresh water may also be received by pipeline.
2. The application for RFD states that emissions of VOCs from the storage impoundment are 0.20 tons per year, with no VOC emissions from the haul roads.
3. The application for RFD states that emissions of all HAPs combined from the storage impoundment are 0.18 tons per year, with no HAP emissions from the haul roads.

4. The application for RFD states that emissions of methanol, the single HAP emitted in the greatest amount, from the storage impoundment are 0.11 tons (220 pounds) per year.
5. The measured concentration of VOCs in the flowback and produced water received at the facility is 365 µg per liter of water. 40 CFR §60.481 Definitions states that equipment in VOC service must be in contact with process fluid that is at least 10% VOC by weight. The liquid processed at this facility is not in VOC service.
6. The water shall be sampled every 10,000 barrels no more than once per day, in accordance with the sampling protocol submitted as part of the RFD. CNX shall conduct sampling and analysis of the incoming water for VOC and methanol using EPA SW-846 Methods 8260 and 8015 (or equivalent). That sampling frequency may be reduced based on the results with written approval from the Department.
7. Any sources claiming an exemption based on rated capacity or emission thresholds must keep adequate records to clearly demonstrate to the Department that the applicable thresholds are not exceeded. The records must be kept for five (5) years and be made available to the Department upon request.
8. Operation of this facility with actual emissions of less than 2.7 tons of VOC, less than 1 ton per year of all HAPs combined, and less than 1,000 pounds per year of any single HAP is exempt from a requirement to be authorized by a State Only Operating Permit.

In conclusion, construction of this proposed facility does not require submittal of an application for a Plan Approval (PA). Also, operation of the proposed facility does not require an Operating Permit. If you require further assistance, please contact Sheri Guerrieri at 412-442-4174 or shguerrier@pa.gov.

Sincerely,

Mark R. Gorog, P.E.
Regional Program Manager
Air Quality Program

Enclosure:

CC: Operations thru E. Speicher Hbg. OnBase Case File: 65-01137