



CRESTONE PEAK
RESOURCES

Fieldwide Air Quality Plan

Crestone Peak Resources Midstream
Pipeline System

April 2020

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1.0 Introduction

This Fieldwide Air Quality plan provides an assessment of air quality impacts of the Pipeline System and discusses measures taken to maintain air quality and minimize emissions of volatile organic compounds (VOC) and particulate matter during pipeline operations.

1.1 Site Location

Crestone Peak Resources Midstream (CPRM) owns and operates the Pipeline System in Arapaho County. An aerial photograph of the system is provided as Figure 1.

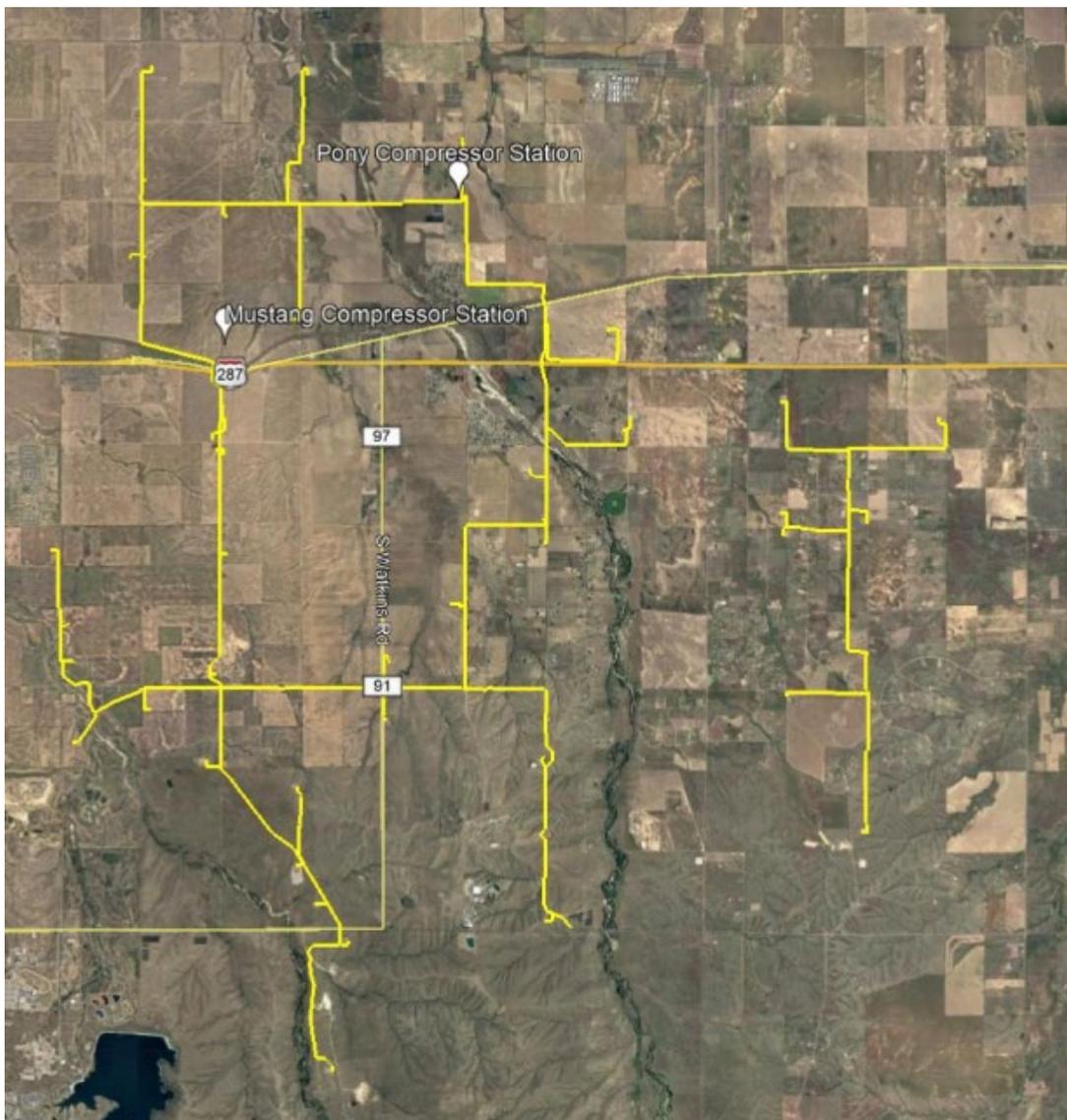


Figure 1 Pipeline System

2.0 Air Quality Plan

2.1 Minimization of Emissions

CPRM pipeline operations will comply with all applicable state, local and federal air quality standards, regulations, and policies in effect during all phases of development, including:

- Federal Clean Air Act (CAA) Program Rules
- Colorado Air Quality Control Commission (AQCC) Regulations administered by the Colorado Department of Public Health and Environment (CDPHE), Air Quality Control Commission (APCD)
- Colorado Oil & Gas Conservation Commission (COGCC) Regulations
- City of Aurora requirements

CPRM will also implement measures described in the following subsections to further minimize impacts to air quality.

2.2 Maintenance and Repair

CPRM will employ measures to reduce or eliminate venting emissions from necessary pipeline maintenance activities such as pigging or other blowdown events.

2.2.1 Routine Maintenance Operations

2.2.1.1 Pigging Operations

Emissions from pigging operations are minimal and below CDPHE permitting and reporting thresholds. CPRM will employ measures to reduce venting emissions from necessary oil and gas pipeline maintenance activities such as pigging or other blowdown events.

Pigging operations will be completed on a weekly frequency with different segments being pigged each day. During the pigging operations, the receiver is depressurized after receiving the pig by opening a manual valve to drain liquids to the skid drain. Any gas in the receiver is vented from the skid drain to atmosphere. To minimize venting, the operator remains at the receiver to close the valve as quickly as possible.

CPRM will maintain operation records of all pigging events and emission calculations will be maintained.

2.2.1.2 Meter Calibrations

Meter calibrations will be performed based on the manufacturer recommended frequency. During calibrations, the meter run is blowdown to atmosphere, connected to a computer to perform the

calibration and then depressurized. CPRM personnel will remain onsite during the entire calibration to minimize all venting to the atmosphere.

2.2.2 Non-Routine Maintenance Operations

For maintenance activity that will involve the intentional venting of gas from a well, tank, compressor or pipeline, beyond routine pipeline maintenance activity and pigging, CPRM shall provide forty eight-hour advance written notice to the City of Aurora (“City”) of such proposed venting. Such notice shall describe or include:

1. The duration and nature of the venting event;
2. Why venting is necessary;
3. What vapors will likely be vented;
4. What steps will be taken to limit the duration of venting; and
5. What steps the operator proposes to undertake to minimize similar events in the future.

If emergency venting is required, or if accidental venting occurs, the operator shall provide such notice to the City of such event as soon as possible, but in no event longer than 24 hours from the time of the event, with the information listed above and with an explanation as to the cause and how the event will be avoided in the future.

2.2.3 Dust

CPRM will implement the following measures to eliminate sources of dust or mitigate dust that may result from operations during normal operations and/or during pipeline maintenance:

The following dust control measures will be taken from unpaved roadways and disturbed areas by:

1. The application of water, as needed;
2. Reduce truck traffic when possible;
3. Implement speed restrictions on roadways; and
4. Perform routine road maintenance.

2.3 Air Quality Action Days

CPRM will respond to air quality Action Day advisories posted by the CDPHE for the Front Range Area by implementing CPRM’s Air Quality Action Plan as feasible. CPRM’s plan provides suggested emission reduction measures that should be implemented for the duration of an air quality Action Day advisory that may, if feasible, include measures as listed such as:

1. Minimize vehicle and engine idling;
2. Reduce truck traffic and worker traffic;
3. Delay vehicle refueling;

4. Delay pigging operations; and
5. Delay any maintenance operations.

2.4 Ambient Air Monitoring

Emissions from pipeline operations are negligible, therefore ambient air monitoring and sampling is not necessary.