

**Petroleum and Natural Gas Systems (Subpart W) of the Greenhouse Gas Reporting Rule
Optional Facility Form for Requesting Use of or Extension of Best Available Monitoring
Methods for Leak Detection and Measurement**

**Form C Part I – Request for BAMM Extension thru December 31, 2011
For Sources Identified in 98.234(f)(4)**

OMB Control No. XXXX-XXXX
Approval expires XX/XX/XXXX

The public reporting and recordkeeping burden for this collection of information is estimated to average XX minutes per response (the burden was already included in ICR XXXXXX-XXXX-XXX). This is an optional application form. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave. NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do NOT send the completed form to this address.

**Petroleum and Natural Gas Systems (Subpart W) of the Greenhouse Gas Reporting Rule
Optional Facility Form for Requesting Use of or Extension of Best Available Monitoring
Methods for Leak Detection and Measurement**

**Form C Part I – Request for Bamm Extension thru December 31, 2011
For Sources Identified in 98.234(f)(4)**

General Information: *If you are an owner or operator subject to Subpart W of 40 CFR Part 98 and have sources eligible for Bamm under 98.234(f)(4), you may use Best Available Monitoring Methods through December 31, 2011 for leak detection and measurement for which it is not reasonably feasible to acquire, install and operate systems to measure these data or to hire a service provider to conduct the activities necessary to complete leak detection and measurement requirements. Owners or operators may request that the EPA Administrator allow the requestor to use Best Available Monitoring Methods through December 31, 2011 for sources in 98.234(f)(4). You must submit your request by April 30, 2011. Please see §98.234(f) regarding the use of Best Available Monitoring Methods in 2011.*

You may use optional Bamm Form C to request the use of Bamm for sources designated in 98.234(f)(4). The basis for requesting the use of Best Available Monitoring Methods may include, but are not limited to, inability to secure relevant equipment vendors or service providers, and accessibility concerns related to installing necessary equipment. To obtain approval, the request must demonstrate to the EPA Administrator's satisfaction that site-specific circumstances do not enable you to reasonably acquire, install and operate the necessary equipment.

If you are interested in submitting a request for an extension of the use of Best Available Monitoring Methods past December 31, 2011 for sources in 98.234 (f)(4), under Subpart W of 40 CFR Part 98 (40 CFR 98.234(f)) to the EPA Administrator, please see Part II of this form. The EPA will only consider requests for Bamm extension beyond 2012 under extreme and unique circumstances for granting a further extension beyond 2012.

This form can be printed and submitted by mail or submitted electronically. Do not send duplicative forms by multiple delivery modes, for example, by email, overnight mail, and fax. While you may choose either method to submit your request to EPA, in order to expedite review of your Bamm request, please submit your application electronically to the following email address: MRRpetition@epa.gov with the email header "Subpart W Bamm Request".

For US mail use the following postal address:

Carole Cook
Climate Change Division
Office of Atmospheric Programs (MC- 6207J)
Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, DC 20460
USA

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For submissions using a private mail carrier (e.g., DHL, FEDEX) use the following address:

Carole Cook
1310 L Street NW (802E)
Washington, DC 20005-4113
USA

Upon receipt, the request will be recorded in the EPA tracking system, and the requester will be notified that EPA has received the request and is evaluating the request. EPA will evaluate your request to confirm that it is consistent with §98.234(f). The agency will then notify you to confirm approval or denial of the application. As a general matter, EPA will base its decision on the information provided in the extension request and does not intend to negotiate on specific issues. As time allows, EPA may follow up on extension requests with additional questions.

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**Form C Part I – Request for Bamm Extension thru December 31, 2011
For Sources Identified in 98.234(f)(4)**

General Information	
1. Name of person to contact about the request	
2. Contact person address (include street address, city, state and zip code)	
3. Contact person phone number	
4. Contact person e-mail address	
5. Contact person date signed	
6. Contact person date submitted	
Facility and Segment Information	
7. Facility name	
8. Facility segment: Please enter appropriate rule segment, for example, Processing would be 98.232 (a)(3).	
9. Facility physical address (include street address, city, state and zip code) for where each emissions source is located. For onshore production sources, please report the AAPG basin name.	
Emission Source Type , Applicability and Monitoring Equipment	
10. Indicate type of emissions source for which the owner/operator is requesting the use of Bamm listed in §98.234(f)(4) (e.g., reciprocating compressor rod packing vents, centrifugal compressor wet seal oil degassing venting, acid gas removal vents, equipment leaks in facilities downstream of onshore production, and transmission storage tanks). For onshore sources, you must identify on this form all fields (using EIA field identification) within the basin for which Bamm is being requested.	Please check: 98.233(d): <input type="checkbox"/> 98.233 (k): <input type="checkbox"/> 98.233 (o): <input type="checkbox"/> 98.233 (p): <input type="checkbox"/> 98.233 (q): <input type="checkbox"/>

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For Sources Identified in 98.234(f)(4)**

<p>11. Total number of emissions sources at the facility included in this application</p>	<p>Report number of sources requesting BMM for each emission source above:</p> <p>98.233(d): _____ 98.233 (k): _____ 98.233 (o): _____ 98.233 (p): Not applicable 98.233 (q): _____</p>
<p>12. Monitoring equipment description (e.g., gas or liquid flow meter, optical gas imaging instrument, acoustic detection device, etc.)</p> <p>Identify the equipment which cannot be obtained or installed in time to meet rule requirements.</p>	
<p>13. Please indicate if documentation (e.g., fuel flow diagram) for the equipment with monitor or sampling location is attached.</p> <p><i>[Indicate whether you are including attachments and include a list of files attached]</i></p> <p>This information is required for monitoring or measurement equipment which would be installed. For leak detection equipment the reporter may include a facility flow diagram and indication of source locations if this information would provide additional support for the BMM request.</p>	
<p>14. Certification that the owner or operator does not already own relevant detection or measurement equipment.</p>	
<p>15. Please indicate the eligible BMM chosen. If the BMM chosen is different for different emission source categories, please identify the BMM chosen for</p>	

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each category source.	
Documentation of Correspondence	
16. Please provide certification of the need to request BMM for leak detection and measurement requirements. Please verify and provide supporting documents that demonstrates evidence of specific service or equipment providers contacted and why services or equipment could not be obtained during 2011 (see 98.234(f)(5)(iii)(B)(3).	
Planned Equipment Installation	
17. What are the specific actions the facility will take to obtain and install the equipment as soon as reasonably feasible?	
18. What is the planned installation date?	
Length of Initial BMM Request	
19. When will you start applying the full monitoring methods in the rule (no later than January 1, 2012, unless the EPA grants an extension)?	

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**Form C Part II – Request for BMM Extension beyond December 31, 2011
For Sources Identified in 98.234(f)(4)**

If you are interested in submitting a request for an extension of the use of Best Available Monitoring Methods past December 31, 2011 for sources in 98.234 (f)(4), under Subpart W of 40 CFR Part 98 (40 CFR 98.234(f)) to the EPA Administrator, you have the option of using this form. You must submit your request by September 30, 2011. The EPA will only consider requests for BMM extension beyond 2012 under extreme and unique circumstances for granting a further extension beyond 2012.

General Information	
1. Name of person to contact about the request	
2. Contact person address (include street address, city, state and zip code)	
3. Contact person phone number	
4. Contact person e-mail address	
5. Contact person date signed	
6. Contact person date submitted	
Facility and Segment Information	
7. Facility name	
8. Facility segment: Please enter appropriate rule segment, for example, Processing would be 98.232 (a) (3).nt	
9. Facility physical address (include street address, city, state and zip code) for where each emissions source is located For onshore production sources, please report the AAPG basin name.	

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**Form C Part II – Request for BAMM Extension beyond December 31, 2011
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Requests for Extension of BAMM beyond 2011	
<p>10. Please list the specific emission source categories and parameters for which BAMM is requested. (The extension request beyond 2011 must be completed for each specific source category for which an extension is desired.)</p>	
<p>11. For each emissions source category requesting use of BAMM, please describe the reason for the BAMM request. This could be a description of the data collection methodologies that do not meet safety regulations, technical infeasibility, or specific laws or regulations that conflict with each specific source for which an owner or operator is requesting use of Best Available Monitoring Methodologies.</p>	
<p>12. For each emissions source category requesting use of BAMM, please provide a detailed explanation and supporting documents of how and when the emissions source category will comply with Subpart W reporting requirements.</p>	