

**Petroleum and Natural Gas Systems (Subpart W) of the Greenhouse Gas Reporting Rule
Optional Facility Form for Requesting Extension of Best Available Monitoring Methods
for Well Related Sources**

Form A Part I – Request for BMM Extension thru December 31, 2011

For Sources identified in 98.234(f)(2)

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 XXXXX-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
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**Form A Part I – Request for BAMM Extension thru December 31, 2011
For Sources identified in 98.234(f)(2)**

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)(2), you may use Best Available Monitoring Methods through June 30, 2011 for well-related data that cannot reasonably be measured according to the monitoring and QA/QC requirements of Subpart W. Therefore, you do not need to submit a Form A BAMM request if you will not need to use BAMM beyond June 30, 2011. You may use optional BAMM Form A to request an extension of BAMM for sources designated in 98.234(f)(2) if measurements cannot be duplicated after June 30, 2011 for those sources. The basis for requesting the extension of the use of Best Available Monitoring Methods may include, but are not limited to, inability to secure data from 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.*

Owners or operators may request that the EPA Administrator allow the requestor to extend the use of Best Available Monitoring Methods through December 31, 2011 for sources in 98.234 (f)(2). You must submit your request by April 30, 2011. Please see §98.234(f) regarding the use of Best Available Monitoring Methods in 2011.

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)(2), 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.

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Washington, DC 20460
USA

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 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.

**Petroleum and Natural Gas Systems (Subpart W) of the Greenhouse Gas Reporting Rule
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**Form A Part I – Request for Bamm Extension thru December 31, 2011
For Sources identified in 98.234(f)(2)**

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, Onshore Production would be 98.232 (c)	
9. Facility location (please provide 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)(2) (e.g., Gas well venting during well completions and workovers with hydraulic fracturing and well testing venting & flaring) You must identify on this form all fields (using EIA field identification) within the basin for which Bamm is being requested.	Please complete: Field _____ 98.233(g): <input type="checkbox"/> Completions 98.233(g): <input type="checkbox"/> Workovers 98.233 (l): <input type="checkbox"/> Well Testing & Flaring Field _____ 98.233(g): <input type="checkbox"/> Completions 98.233(g): <input type="checkbox"/> Workovers 98.233 (l): <input type="checkbox"/> Well Testing & Flaring Attach additional pages as necessary.
11. Total number of emissions sources at the facility (basin) included in this	Report number of sources requesting Bamm for each emission source:

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Form A Part I – Request for BMM Extension thru December 31, 2011

For Sources identified in 98.234(f)(2)

<p>application</p>	<p>98.233(g): _____ Completions 98.233(g): _____ Workovers 98.233 (l): _____ Well Testing & Flaring</p>
<p>12. Please indicate if documentation (e.g., fuel flow diagram, map) for the equipment is attached.</p> <p><i>[Indicate whether you are including attachments and include a list of files attached]</i></p> <p>For well related BMM requests, the reporter may provide a list of individual fields within the basin which require the BMM extension or provide a map of the basin with fields identified. Either would be acceptable if it would assist in explanation of the need for the BMM extension.</p>	
<p>13. Indicate the specific reason including identification of the specific rule requirements for which BMM extension is being requested (equipment installation issues, service vendor delays, contractual issues, etc). If the reasons are different for each emissions source, or for different fields within the basin, please specify the issue for each.</p>	
<p>14. Please indicate the BMM chosen in place of the rule requirements such as company records, other engineering estimates, available data, etc. If the BMM chosen is different for different emission source categories, please identify the BMM chosen for each category source.</p>	
<p>Documentation of Effort to Comply</p>	
<p>15. Please verify and provide supporting</p>	

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<p>documents that the owner or operator has attempted to obtain needed equipment, services, or contractual modifications, and why they could not be resolved by June 30, 2011. If the reason for the extension is that the owner or operator could not collect data from a service provider or relevant organization, please provide documentation of a good faith effort to modify contracts, leases, or arrangements (See 98.234 (f)(6)(ii)(D)).</p>	
<p align="center">Planned Actions and Timing to Comply:</p>	
<p>16. What are the specific actions the facility will take to comply with monitoring requirements as soon as possible?</p>	
<p>17. What is the planned installation date or date where all issues are resolved for compliance with monitoring requirements?</p>	
<p align="center">Length of BMM Extension Request</p>	
<p>18. When will you start applying the full monitoring methods in the rule? (If you may require BMM beyond December 31, 2011, you must complete the bottom section of this form and re-submit by September 30, 2011.)</p>	

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**Form A Part II – Request for BAMB Extension Beyond December 31, 2011
For Sources identified in 98.234(f)(2)**

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)(2), 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 BAMB 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, Onshore Production would be 98.232 (c)	
9. Facility location (please provide AAPG basin name).	
Requests for Extension of BAMB beyond 2011	
10. Please list the specific emission source categories and parameters for which BAMB is requested. (The extension request beyond 2011 must be completed for each specific source category for which an extension is desired.)	
11. For each emissions source category requesting use of BAMB, please describe	

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<p>the unique and extenuating circumstances for the BAMB 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 BAMB, please provide a detailed explanation and supporting documents of how and when the emissions source category will comply with Subpart W reporting requirements.</p>	