

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

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

For Sources identified in 98.234(f)(2) – Well Related Emissions

OMB Control No. 2060-0651

Approval expires 12/31/2013

The public reporting and recordkeeping burden for this collection of information is estimated to average 60 minutes per response (the burden was already included in ICR 2376.02). 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.

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For Sources identified in 98.234(f)(2) – Well Related Emissions

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. You do not need to submit a Form A BAMM request to EPA unless you are planning to use BAMM beyond June 30, 2011 for the sources identified in 98.234(f)(2) for which measurements cannot be duplicated after June 30, 2011. You may use this optional form to request to use BAMM to estimate emissions that occur beyond July 1, 2011 through December 31, 2011 for sources identified in 98.234(f)(2). You must submit your request by **April 30, 2011**.

To obtain approval, the request must demonstrate to the EPA Administrator’s satisfaction that it is not reasonably feasible to obtain the data necessary to meet the requirements of Subpart W. The basis for requesting the extension of the use of BAMM may include, but is not limited to, inability to secure data from relevant equipment vendors or service providers, or concerns related to installing necessary equipment.

For requests to use BAMM to estimate emissions that occur beyond December 31, 2011 for sources listed in 98.234(f)(8) due to unique and extreme circumstances which include safety, technical infeasibility, or inconsistency with local, State, or Federal regulations, you must submit your request by **September 30, 2011**. You may use Part II of this form if you find it necessary to submit a request for an extension of the use of BAMM past December 31, 2011, under subpart W of 40 CFR part 98 (40 CFR part 98.234(f)(8)).

The following table summarizes the important dates for subpart W BAMM requests for sources identified in 98.234(f)(2)

Important Dates for Subpart W BAMM Requests For Sources Identified in 98.234(f)(2)

To use BAMM to estimate emissions that occur between July 1, 2011 and December 31, 2011 for the following parameters:	Demonstrate that it is not reasonably feasible to comply with the monitoring requirements of subpart W after:	Submit BAMM request no later than:
Gas well venting during well completions and workovers with hydraulic fracturing as specified in 98.233(g); Well testing venting and flaring as specified in 98.233(l)	June 30, 2011	April 30, 2011
To use BAMM to estimate emissions that occur beyond December 31, 2011 for the following parameters:	Demonstrate that, due to extreme and unique circumstances, it is not reasonably feasible to comply with	Submit BAMM request no later than:

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	the monitoring requirements of subpart W after:	
For sources listed in 98.234(f)(8).	December 31, 2011	September 30, 2011

This form can be submitted electronically (preferred) to MRRpetition@epa.gov. Please include “Subpart W BAMM Request” in the subject line.

As an alternative, the form can be printed and mailed. (Please do not send duplicative forms by multiple delivery modes, for example, by email, overnight mail, and fax.) 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

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
Phone: 202-343-9334
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. The requester must discontinue using best available monitoring methods and begin following all applicable monitoring and QA/QC requirements of subpart W and part 98 no later than July 1, 2011 unless EPA approves an extension request before that date.

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

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. Signature <i>"I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."</i>	
6. Contact Person Date Signed	
7. Contact Person Date Submitted	
Facility and Segment Information 40 CFR §98.230(a)	
8. Facility name	
9. Industry segment: Please enter appropriate rule segment, from §98.230 of 40 CFR part 98	
10. Facility location (please provide AAPG basin name).	
Emission Source Type, Applicability, and Monitoring Equipment 40 CFR §98.234(f)(6)(ii)(A)	
11. Include a list (you may attach the necessary documentation if necessary) of the specific source types and specific equipment, monitoring instrumentation, contract modifications, and/or services for which the request is being made and the locations (for each emissions source	

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<p>indicate the applicable field for which BAMM is being requested) where each piece of monitoring instrumentation will be installed, monitoring service will be supplied, or contracts will be modified.</p>	
<p>12. Please indicate the BAMM chosen in place of the rule requirements such as company records, other engineering estimates, available data, etc. If the BAMM chosen differs by emission source category, please identify the BAMM chosen for each category choice.</p>	
<p>Identification of Specific Rule Requirements <i>40 CFR §98.234(f)(6)(ii)(B)</i></p>	
<p>13. Identify the specific rule requirements – by subpart, section, and paragraph number – for which the instrumentation, contract modification, or monitoring service is needed. (Include citations from 98.233 as applicable) Please attach additional documentation as needed.</p>	
<p>Applicable Correspondence <i>40 CFR §98.234(f)(6)(ii)(C) and §98.234(f)(6)(ii)(D)</i></p>	
<p>14. Please attach a description and applicable correspondence outlining the diligent efforts of the owner or operator in obtaining the needed equipment or service and why they could not be obtained and installed in a period of time enabling completion of applicable requirements of this subpart within the 2011 calendar year. Please attach additional documentation as needed.</p>	
<p>Specific Actions to Comply with Subpart W <i>40 CFR §98.234(f)(6)(ii)(E)</i></p>	
<p>15. Describe the specific actions the owner/operator will take to comply with monitoring requirements in 2012 and beyond. Please attach documentation as necessary.</p>	

**Petroleum and Natural Gas Systems (Subpart W) of the Greenhouse Gas Reporting Rule
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(BAMM) Beyond December 31, 2011**

**Form A Part II – Request for BAMM Extension Beyond December 31, 2011
For Sources identified in 98.234(f)(8)**

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)(8), 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 BAMM 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. Signature <i>"I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."</i>	
6. Contact person date signed	
7. Contact person date submitted	
Facility and Segment Information	
8. Facility name	
9. Industry segment: Please enter appropriate rule segment, from §98.230 of 40 CFR part 98	
10. Facility location (please enter location address of facility. For onshore petroleum and natural gas production facilities,	

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<p>please provide AAPG basin name as appropriate).</p>	
<p>Listing of Specific Sources for BAMM 40 CFR §98.234(f)(8)(iii)</p>	
<p>11. Please list the specific source categories and parameters for which BAMM is being requested. Please attach documentation as necessary.</p>	
<p>Reason for BAMM Request 40 CFR §98.234(f)(8)(iv)</p>	
<p>12. Include 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 BAMM. Please attach additional documentation as necessary.</p>	
<p>13. Please indicate the BAMM chosen in place of the rule requirements such as company records, other engineering estimates, available data, etc. If the BAMM chosen differs by emission source category, please identify the BAMM chosen for each category choice.</p>	
<p>Specific Actions to Comply with Subpart W §98.234(f)(8)(v)</p>	
<p>14. Include a detailed explanation and supporting documentation of how and when the owner or operator will receive the services or equipment to comply with all of this subpart W reporting requirements. Indicate the time period for which BAMM is being requested. Please attach additional documentation as necessary.</p>	