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VIA ELECTRONIC MAIL AND FEDERAL EXPRESS

October 13, 2011

Ms. Tina Artemis
Regional Hearing Clerk
U.S. Environmental Protection Agency--Region 8
Mail Code 8RC
1595 Wynkoop Street
Denver, Colorado 80202-1129

Re: In the Matter of EOG Resources, Inc., Docket No. CAA-08-2011-0023
Unopposed Motion to Amend Administrative Complaint and Consent Agreement

Dear Ms. Artemis:

Please find enclosed for filing the original and two copies of the above-references motion and attachments. Please time stamp one copy and return it to my attention in the self-addressed envelope.

If you have questions or require further information, please feel free to contact me.

Very truly yours,

Eddie Lewis

Edward Lewis

ECL/jnb

Enclosures

cc: Ms. Cynthia Reynolds, EPA Region 8 (via Electronic Mail)
Mr. Jim Eppers, EPA Region 8 (via Electronic Mail)
Mr. David Rochlin, EPA Region 8 (via Electronic Mail)

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 8
Docket No. CAA-08-2011-0023

In the Matter of:)	
)	
EOG RESOURCES, INC.)	<u>UNOPPOSED MOTION TO AMEND</u>
)	ADMINISTRATIVE COMPLAINT
Respondent.)	AND CONSENT AGREEMENT
)	

AUTHORITY

COMES NOW EOG Resources, Inc. and files this its Unopposed Motion to Amend the Administrative Complaint and Consent Agreement.

1. On August 29, 2011, the Court approved an Administrative Complaint and Consent Agreement ("Agreement") in this matter (see August 29, 2011 Order Granting Filing of An Electronic Consent Agreement Final Order).

2. Pursuant to the terms of Paragraph F.13 of the Agreement, the purpose of this Motion is to request that the Court approve a revised and amended Appendix A, Table A-1, to the Agreement ("Revised Appendix A"). Additionally, as a result of the proposed revision, Respondent also seeks to amend Section E, Paragraph 1 ("E.1") of the Agreement to reflect the increased civil penalty amount caused by the revision to Appendix A, Table A-1.

3. Respondent respectfully requests that Appendix A be amended to add one (1) additional source to Table A-1. Respondent identified this one additional source, which was inadvertently not referenced in the Table A-1 as signed on August 29, 2011. Specifically, the Revised Table A-1 now includes source No. "102_2," further identified as a well site named "Fertile 40-1718H," with the corresponding information for location, site completion date, and casinghead

gas and tank control details.

4. As a result of increasing the total number of emission sources listed in Appendix A by one (1) source, from 137 to 138 sources, the civil penalty amount listed in the Agreement at E.1 should correspondingly be amended to "\$414,000.00" instead of \$411,000.00 as currently in the Agreement. Respondent, therefore, respectfully seeks to amend Section E.1. of the Agreement to reflect the appropriate civil penalty amount of \$414,000.00.

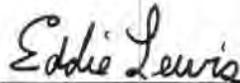
5. Respondent has conferred with the Environmental Protection Agency, Region 8 ("EPA") with respect to this Motion, and EPA confirmed that it has no objection to Respondent's proposed changes to the Revised Appendix A, Table A-1, or to Section E.1 of the Agreement.

PRAYER

For the above-mentioned reasons, Respondent respectfully requests that the Court approve substitution of the attached Revised Appendix A, Table A-1 into the Agreement, and approve revision of Section E.1 of the Agreement, as described herein and attached to this motion.

EOG RESOURCES, INC.,
Respondent.

Date: October 13, 2011



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Counsel for Respondent

CERTIFICATE OF SERVICE

The undersigned certifies that the original of the attached Unopposed Motion to Amend Administrative Complaint and Consent Agreement in the matter of EOG Resources, Inc.; Docket No. CAA-08-2011-0023, was filed with the Regional Hearing Clerk on October 13, 2011.

Further, the undersigned certifies that a true and correct copy of the document was e-mailed to Cynthia Reynolds, Director, Air & Toxics Technical Enforcement Program, and Jim Eppers and David Rochlin, Enforcement Attorneys, U.S. EPA – Region 8, 1595 Wynkoop Street, Denver, CO 80202-1129.

Date: October 13, 2011



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Counsel for Respondent

EMISSION SOURCE INVENTORY
Table A-1 Existing Emission Sources (commenced construction by August 30, 2011)

No.	Source Name	Latitude	Longitude	Section-Township-Range	Well site completion date	Casinghead gas controlled or captured	Casinghead gas control device	Tank control device	Tank control device install date
1	Bear Den 4-20H	47.7905220	102.7297940	SEC 20-T150N-R94W	03/04/2011	Flare	Utility Flare	Combustor	03/04/2011
2	Bear Den 7-17H	47.8050970	102.7309530	SEC 17-T150N-R94W	01/06/2011	Flare	Utility Flare	Pit Flare	01/06/2011
3	Clarks Creek 3-0805H	47.9075140	102.7291830	SEC 8-T151N-R94W	06/04/2011	Flare	Engineered TCI to Combustor	Combustor	06/04/2011
4	Clarks Creek 12-4719H	47.9058920	102.7515110	SEC 7-T151N-R94W	08/09/2011	Flare	Pit Flare	Combustor	08/09/2011
5	DeLienne 1-07H	47.9931780	102.2422590	SEC 7-T152N-R90W	04/04/2008	Sales	NA	Combustor	04/04/2008
6	Evans 1-13H	47.9913940	102.1477610	SEC 13-T152N-R90W	02/07/2008	Sales	NA	Combustor	02/07/2008
7	Evanson 1-18H	47.9908910	102.2555660	SEC 18-T152N-R90W	05/21/2008	Sales	NA	Combustor	05/21/2008
8	Fertile 2-1H	47.9332710	102.1490320	SEC 1-T151N-R90W	08/06/2009	Sales	NA	Combustor	08/07/2009
9	Fertile 4-3H	47.9207250	102.1781190	SEC 3-T151N-R90W	08/04/2009	Sales	NA	Combustor	08/07/2009
10	Fertile 5-4H	47.9331080	102.2133340	SEC 4-T151N-R90W	08/05/2009	Sales	NA	Combustor	08/07/2009
11	Fertile 6-5H	47.9207720	102.2158630	SEC 5-T151N-R90W	07/24/2008	Sales	NA	Combustor	07/24/2008
12	Fertile 7-06H	47.9333330	102.2516290	SEC 6-T151N-R90W	08/25/2009	Sales	NA	Combustor	08/07/2009
13	Fertile 9-08H	47.9063120	102.2200970	SEC 8-T151N-R90W	08/23/2009	Sales	NA	Combustor	08/07/2009
14	Fertile 10-9H	47.9190780	102.2133140	SEC 9-T151N-R90W	08/12/2009	Sales	NA	Combustor	08/07/2009
15	Fertile 11-10H	47.9190030	102.1919000	SEC 10-T151N-R90W	06/07/2010	Sales	NA	Combustor	06/07/2010
16	Fertile 13-18H	47.8920850	102.2375490	SEC 18-T151N-R90W	09/12/2009	Sales	NA	Combustor	09/12/2009
17	Fertile 14-17H	47.8919750	102.2201300	SEC 17-T151N-R90W	05/03/2010	Sales	NA	Combustor	05/03/2010
18	Fertile 16-20H	47.8773960	102.2156630	SEC 20-T151N-R90W	07/04/2010	Sales	NA	Combustor	07/05/2010
19	Fertile 17-21H	47.8524490	102.1234670	SEC 21-T151N-R90W	07/07/2010	Sales	NA	Combustor	07/08/2010
20	Fertile 18-30H	47.8633360	102.2411950	SEC 30-T151N-R90W	06/12/2010	Sales	NA	Combustor	06/13/2010
21	Fertile 19-29H	47.8633980	102.2159630	SEC 29-T151N-R90W	06/26/2011	Sales	NA	Combustor	06/26/2011
22	Fertile 23-19H	47.8896040	102.2556530	SEC 19-T151N-R90W	09/22/2009	Sales	NA	Combustor	09/22/2009
23	Fertile 29-27H	47.8631810	102.1730400	SEC 27-T151N-R90W	10/19/2010	Flare	Pit Flare	Combustor	10/19/2010
24	Fertile 30-28H	47.8630400	102.1991590	SEC 28-T151N-R90W	05/07/2010	Sales	NA	Combustor	05/08/2010
25	Fertile 32-33H	47.8612750	102.2131080	SEC 33-T151N-R90W	06/16/2010	Sales	NA	Combustor	06/17/2010
26	Fertile 34-31H	47.8610380	102.2507410	SEC 31-T151N-R90W	06/09/2010	Sales	NA	Combustor	06/10/2010
27	Fertile 35-32H	47.8484290	102.2174080	SEC 32-T151N-R90W	09/18/2009	Sales	NA	Combustor	09/01/2009
28	Fertile 37-07H	47.9061700	102.2373730	SEC 7-T151N-R90W	05/18/2010	Sales	NA	VRU	05/20/2010
29	Fertile 38-20H	47.8901008	102.2351000	SEC 28-T151N-R90W	07/04/2010	Sales	NA	Combustor	07/05/2010
30	Fertile 45-29H	47.8758140	102.2312940	SEC 29-T151N-R90W	06/14/2011	Sales	NA	Combustor	06/14/2011
31	Fertile 101-04H	47.9207830	102.2058690	SEC 4-T151N-R90W	04/22/2010	Sales	NA	Combustor	04/23/2010
32	GDR 1-7H	47.9932958	102.1136499	SEC 7-T152N-R89W	03/26/2008	Sales	NA	Combustor	03/26/2008
33	Gewing 1-9H	47.9930110	102.1998700	SEC 9-T152N-R90W	08/12/2007	Sales	NA	Combustor	08/12/2007
34	HG 1-14H	47.9903110	102.1693500	SEC 14-T152N-R90W	01/28/2008	Sales	NA	Combustor	01/28/2008
35	Hovda 1-8H	47.9936720	102.2208280	SEC 8-T152N-R90W	09/10/2008	Sales	NA	Combustor	03/18/2010
36	Liberty 2-11H	47.9065450	102.2798500	SEC 11-T151N-R91W	12/23/2009	Sales	NA	Combustor	01/04/2010
37	Liberty 3-14H	47.8924920	102.2797410	SEC 14-T151N-R91W	12/22/2010	Sales	NA	VRU	12/22/2010
38	Liberty 4-13H & Liberty 103-13H	47.9047650	102.2778080	SEC 13-T151N-R91W	08/24/2010	Sales	NA	VRU	08/24/2010
39	Liberty 05-24H	47.8898430	102.2741380	SEC 24-T151N-R91W	09/08/2010	Sales	NA	VRU	09/08/2010
40	Liberty 6-25H	47.8758420	102.2766370	SEC 25-T151N-R91W	05/21/2010	Sales	NA	VRU	05/22/2010
41	Liberty 8-01H	47.9337090	102.2770430	SEC 1-T151N-R91W	07/21/2010	Sales	NA	VRU	07/21/2010
42	Liberty 09-23H	47.8856210	102.2793890	SEC 23-T151N-R91W	09/14/2010	Sales	NA	VRU	09/14/2010
43	Liberty 10-36H & Liberty LR 16-36H	47.8589560	102.2737510	SEC 36-T151N-R91W	2/11/2011-2/22/2011	Sales	NA	Combustor/VRU	02/11/2011
44	Liberty 23-12H & Liberty 101-12H	47.9067980	102.2594880	SEC 12-T151N-R91W	08/31/2010	Sales	NA	Combustor	08/31/2010
45	Liberty 100-26H	47.8631410	102.2819240	SEC 26-T151N-R91W	08/17/2010	Sales	NA	Combustor	08/17/2010
46	Liberty 102-01H	47.9337110	102.2752890	SEC 1-T151N-R91W	11/12/2010	Sales	NA	Combustor	11/12/2010
47	Liberty LR 14-23H	47.8863910	102.2904990	SEC 23-T151N-R91W	04/07/2011	Sales	NA	Combustor	04/07/2011
48	Liberty LR 17-11H	47.9081470	102.2812930	SEC 11-T151N-R91W	06/16/2011	Sales	NA	Pit Flare	06/16/2011
49	Liberty LR 19-23H	47.8798870	102.2879570	SEC 23-T151N-R91W	03/02/2011	Sales	NA	Combustor	03/02/2011
50	Liberty LR 21-36H	47.8497940	102.2736200	SEC 36-T151N-R91W	07/18/2011	Sales	NA	Combustor	07/18/2011

EOG Resources, Inc.,
Appendix A, Table A-1

No.	Source Name	Latitude	Longitude	Section-Range Township-Range	Well site completion date	Casinghead gas controlled or captured	Casinghead gas control device	Tank control device	Tank control device install date
51	Mandaree 1-10H	47.7448580	102.7045000	SEC 10-T149N-R94W	09/01/2010	Flare	Utility Flare	Combustor	09/01/2010
52	Mandaree 2-09H	47.7454030	102.7248610	SEC 9-T149N-R94W	08/08/2010	Flare	Utility Flare	Combustor	08/08/2010
53	Mandaree 4-15H	47.7186970	102.8855690	SEC 15-T149N-R94W	08/13/2010	Flare	Utility Flare	Combustor	08/13/2010
54	Mandaree 5-16H	47.7298690	102.7248610	SEC 16-T149N-R94W	09/23/2010	Flare	Utility Flare	Combustor	10/16/2010
55	Mandaree 6-20H	47.7169390	102.7471860	SEC 20-T149N-R94W	09/23/2010	Flare	Utility Flare	Combustor	09/23/2010
56	Mandaree 7-17H	47.7310830	102.7483890	SEC 17-T149N-R94W	09/27/2010	Flare	Utility Flare	Combustor	09/27/2010
57	Mandaree 9-04H	47.7594500	102.7157420	SEC 4-T149N-R94W	03/17/2011	Flare	Utility Flare	Combustor	03/17/2011
58	Mandaree 10-05H	47.7603140	102.7459970	SEC 5-T149N-R94W	10/02/2010	Flare	Utility Flare	Combustor	10/02/2010
59	Mandaree 12-07H	47.7333610	102.7507280	SEC 7-T149N-R94W	11/19/2010	Flare	Utility Flare	Combustor	11/19/2010
60	Model 10-7H	47.9933000	102.1206860	SEC 7-T152N-R89W	07/09/2009	Sales	NA	Combustor	07/30/2009
61	Model 100-19H	47.9640810	102.1136840	SEC 19-T152N-R89W	10/04/2009	Sales	NA	Combustor	11/01/2009
62	Parshall 3-19H	47.9642610	102.2425020	SEC 19-T152N-R90W	08/14/2009	Sales	NA	Combustor	08/07/2009
63	Parshall 4-20H	47.9643060	102.2188820	SEC 20-T152N-R90W	08/01/2008	Sales	NA	Combustor	03/18/2010
64	Parshall 5-21H	47.9641160	102.1989490	SEC 21-T152N-R90W	07/15/2008	Sales	NA	Combustor	03/18/2010
65	Parshall 6-22H	47.9642130	102.1748820	SEC 22-T152N-R90W	10/25/2008	Sales	NA	Combustor	10/25/2008
66	Parshall 7-23H	47.9766310	102.1701970	SEC 23-T152N-R90W	05/06/2008	Sales	NA	Combustor	05/06/2008
67	Parshall 8-24H	47.9767970	102.1479010	SEC 24-T152N-R90W	11/01/2008	Sales	NA	Combustor	11/01/2008
68	Parshall 9-30H	47.9621450	102.2508300	SEC 30-T152N-R90W	11/15/2008	Sales	NA	Combustor	11/15/2008
69	Parshall 10-29H	47.9620310	102.2309110	SEC 29-T152N-R90W	08/10/2009	Sales	NA	Combustor	08/07/2009
70	Parshall 11-28H	47.9619880	102.2133130	SEC 28-T152N-R90W	12/12/2008	Sales	NA	Combustor	03/18/2010
71	Parshall 12-27	47.9626790	12.1907510	SEC 27-T152N-R90W	07/12/2009	Sales	NA	Combustor	03/18/2010
72	Parshall 13-26H	47.9627330	102.1694130	SEC 26-T152N-R90W	10/18/2008	Sales	NA	Combustor	10/18/2008
73	Parshall 15-31H	47.9480390	102.2560780	SEC 31-T152N-R90W	08/08/2009	Sales	NA	Combustor	08/07/2009
74	Parshall 16-32H	47.9352440	102.2166390	SEC 32-T152N-R90W	08/28/2009	Sales	NA	Combustor	08/07/2009
75	Parshall 17-33H	47.9350650	102.1988120	SEC 33-T152N-R90W	08/20/2009	Sales	NA	Combustor	08/07/2009
76	Parshall 18-34H	47.9472690	102.1912140	SEC 34-T152N-R90W	08/21/2009	Sales	NA	Combustor	08/07/2009
77	Parshall 19-35H	47.9353870	102.1555190	SEC 35-T152N-R90W	08/06/2009	Sales	NA	Combustor	08/07/2009
78	Parshall 100-22H	47.9544420	102.1842190	SEC 22-T152N-R90W	05/05/2010	Sales	NA	Combustor	04/29/2010
79	Riverview 1-32H	47.9478690	102.7457080	SEC 32-T152N-R94W	11/15/2010	Flare	Utility Flare	Combustor	11/15/2010
80	Roberta 1-16H	47.8919850	102.1979590	SEC 16-T151N-R90W	08/29/2009	Sales	NA	Combustor	08/07/2009
81	Roger 1-15H	47.9909610	102.1912860	SEC 15-T152N-R90W	03/21/2008	Sales	NA	Combustor	03/21/2008
82	Ruud 1-18H	47.9911120	102.1269200	SEC 18-T152N-R89W	10/24/2010	Sales	NA	Combustor	10/24/2010
83	Sampson 1-12H	47.9934440	102.1331430	SEC 12-T152N-R90W	08/31/2007	Sales	NA	Combustor	08/31/2007
84	School 1-16H	47.9912190	102.2726640	SEC 16-T152N-R90W	03/02/2008	Sales	NA	Combustor	03/02/2008
85	Shirley 1-17H	47.9914440	102.2322080	SEC 17-T152N-R90W	09/25/2008	Sales	NA	Combustor	09/25/2008
86	Van Hook 1-13H	47.9909210	102.2771070	SEC 13-T152N-R91W	06/10/2008	Sales	NA	Combustor	08/07/2009
87	Van Hook 2-24H	47.9640000	102.2578640	SEC 24-T152N-R91W	07/08/2009	Sales	NA	VRU	08/07/2009
88	Van Hook 3-25H	47.9498080	102.2588810	SEC 25-T152N-R91W	07/30/2009	Sales	NA	VRU	08/07/2009
89	Van Hook 4-36H	47.9474860	102.2773540	SEC 36-T152N-R91W	08/27/2009	Sales	NA	Combustor	08/07/2009
90	Van Hook 5-11H	47.9930500	102.2834390	SEC 11-T152N-R91W	07/05/2009	Sales	NA	VRU	08/07/2009
91	Van Hook 6-14H	47.9788440	102.2836720	SEC 14-T152N-R91W	12/18/2008	Sales	NA	VRU	08/07/2009
92	Van Hook 7-23H	47.9768610	102.2983560	SEC 23-T152N-R91W	05/30/2010	Sales	NA	VRU	05/31/2010
93	Van Hook 8-36H	47.9475280	102.2758440	SEC 26-T152N-R91W	08/02/2010	Sales	NA	VRU	08/02/2010
94	Van Hook 13-35H	47.9352140	102.2809170	SEC 35-T152N-R91W	06/19/2010	Sales	NA	VRU	06/20/2010
95	Van Hook 15-15H	47.9914770	102.3153660	SEC 15-T152N-R91W	09/11/2010	Sales	NA	VRU	09/11/2010
96	Van Hook 16-35H	47.9350770	102.2883630	SEC 35-T152N-R91W	08/19/2011	Sales	NA	Combustor	08/19/2011
97	Van Hook 17-23H	47.9758860	102.2983310	SEC 23-T152N-R91W	07/04/2011	Flare	Pit Flare	Combustor	07/04/2011
98	Van Hook 100-15H	47.9787560	102.3065920	SEC 15-T152N-R91W	11/11/2009	Sales	NA	VRU	03/18/2010
99	Bear Den 5-31H	47.7905220	102.7297940	SEC 20-T150N-R94W	Not Completed	NA	NA	NA	NA
100	Fertile 43-2821H	47.8664580	102.1950890	SEC 28-T151N-R90W	Not Completed	NA	NA	NA	NA
101	Horse Camp 2-11H & Horse Camp 101-11H	47.7449780	102.5545360	SEC 11-T149N-R93W	Not Completed	NA	NA	NA	NA
102	Horse Camp 3-16H & Horse Camp 102-16H	47.7307940	102.5865060	SEC 16-T149N-R93W	Not Completed	NA	NA	NA	NA
102_2	Fertile 40-1718H	47.8919390	102.2261390	SEC 17-T151N-R90W	08/26/2011	Sales	Engineered Flare	Combustor	08/26/2011

2. Control Requirements

- a. For all Existing Emission Sources listed in Appendix A, Table A-1, the Respondent shall comply with the requirements of Appendix B by no later than December 1, 2011.
- b. For all New Emission Sources listed in Appendix A, Tables A-2, A-3, and A-4 the Respondent shall comply with the requirements of Appendix B upon start-up of production. Emission sources that receive an effective synthetic minor source permit before commencing construction are not subject to the requirements of this Agreement.

3. Notification

Respondent shall notify the EPA on the last business day of each month of all of the emission sources subject to this Agreement that commence construction in the previous month. Respondent shall also notify the EPA whether those emission sources are meeting the control requirements as required by Appendix B and whether they have received an effective synthetic minor source permit. This notice shall also include a list of emissions sources that are removing a 98% control device and using a 90% control device as outlined in Appendix B.

Unless otherwise specified herein, whenever Respondent's notification, submissions, or communication are required by this Agreement, they shall be made electronically or mailed to the following:

Cynthia J. Reynolds, Director
U.S. EPA Region 8 (8ENF-AT)
Air & Toxics Technical Enforcement Program
1595 Wynkoop St.
Denver, CO 80208-1129
reynolds.cynthia@epa.gov

E. CIVIL PENALTY

1. Pursuant to an analysis of the facts and circumstances of this case with the statutory factors described in section 113(d)(1)(B) of the CAA, 43 U.S.C. §7413(d)(1)(B), EPA has determined that an appropriate civil penalty to settle this action is the amount of \$3,000 per emission source listed in Appendix A for a total of \$ 414,000.00.
2. Respondent consents to the issuance of a Final Order and consents for the purpose of settlement to the payment of the civil penalty in the manner described below in this paragraph:
 - a. Payment is due within 90 calendar days from the date of the Final Order, to be issued by the EPA's Regional Judicial Officer, that adopts this Administrative Complaint and Consent Agreement. If the due date falls on a weekend or legal federal holiday, then the due date