

**Subject:** Re: FOIA 4149-14/Clarification needed  
**From:** Ellis Boal <ellisboal@voyager.net>  
**Date:** 7/15/2014 3:08 PM  
**To:** "McLeod, Rachel (DEQ)" <McLeodR1@michigan.gov>  
**CC:** Rick Henderson <HENDERSONR2@michigan.gov>

Rachel,

I finally conferenced with Terry Wright and Annette Switzer of the Air Quality Division today. Thank you for setting that up.

They stated that any GHG emissions which DEQ might monitor or limit at the wellhead would be handled by OOGM not AQD. As you know I first directed my questions about this to Rick Henderson of OOGM in May. When he had no data to provide concerning 2013 Encana Utica-Collingwood GHG emissions, on May 28 I sent him a FOIA. He forwarded it to you for handling.

On June 6, you sent me sample 2013 Encana permit information available from AQD, but it was only about non-wellhead facilities. Further it concerned limitations only on non-GHG emissions (VOC, CO, NOX).

Terry and Annette said today that any monitoring AQD does is of non-wellhead structures such as glycol dehydrators. I asked Terry if he would look to see if AQD does any monitoring or limiting of GHG emissions in non-wellhead facilities. He said he didn't think so, but would check further to be sure.

Terry and Annette added that any monitoring or limiting of GHG emissions from the wellhead itself would be available only from OOGM. I explained that OOGM and Rick Henderson was where my inquiry started and came up empty.

Accordingly unless Terry gets back to me with data about AQD monitoring or limiting of GHG in 2013, I conclude from all this that no one anywhere in DEQ makes any attempt to monitor or limit oil-or-gas-related GHG emissions, whether from wellheads or from associated surface structures.

I reminded them that EPA also does no monitoring or limiting of GHG emissions from wells or facilities. The bottom line is that no governmental agency anywhere at any level is watching the global warming potential of oil-gas extraction in Michigan.

I will be addressing DEQ on this issue (and other issues) at public hearings this evening and tomorrow, and will relate this inquiry and the results. I expect Rick will be there. I am cc'ing this to him. Please also forward it to Terry and Annette, who indicated they probably would not be at the hearings.

Thank you again for facilitating the conversation.

Ellis

On 7/15/2014 12:34 AM, Ellis Boal wrote:

Rachel,

My landline phone is 231-547-2626. However I will be out Tuesday, Wednesday, and the first half of Thursday.

Try me Thursday afternoon, or sometime Friday. Thanks.

Ellis

On 7/14/2014 8:06 AM, McLeod, Rachel (DEQ) wrote:

Good Morning Ellis, it has come to my attention that we do not have a phone number listed for you. Would you like to forward to me so I can get the engineers to contact you that way? I believe they should have emailed you last week. I was out on Friday, so I am following up.

Thank you!

Rachel R. McLeod  
Departmental Analyst  
DEQ-AQD-Enforcement Unit  
Phone: 517-284-6770  
[mcleodr1@michigan.gov](mailto:mcleodr1@michigan.gov)

-----Original Message-----

From: Ellis Boal [<mailto:ellisboal@voyager.net>]  
Sent: Thursday, July 10, 2014 6:20 PM  
To: McLeod, Rachel (DEQ)  
Subject: Re: FOIA 4149-14/Clarification needed

Rachel,

No need to apologize. Thanks for keeping on this. I will look forward to a call in the next couple of days.

Ellis

On 7/10/2014 11:31 AM, McLeod, Rachel (DEQ) wrote:

Dear Mr. Boal:

I apologize for my delay, but I am the messenger and simply send documents due to my other duties and placement in the AQD. I have worked it out that someone will follow up with you on the phone. I am out of the office tomorrow and have scheduled a few permit engineers to follow up with you on this FOIA request tomorrow. If you do not hear from someone this week, please let me know on Monday when I return to the office. Thank you for your patience.

Regards,

Rachel R. McLeod

Departmental Analyst

DEQ-AQD-Enforcement Unit

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\*From:\* Ellis Boal [<mailto:ellisboal@voyager.net>]  
\*Sent:\* Monday, June 30, 2014 3:03 PM  
\*To:\* DEQ-AQD-FOIA; McLeod, Rachel (DEQ)  
\*Cc:\* Henderson, Rick (DEQ); LuAnne Kozma  
\*Subject:\* Re: FOIA 4149-14/Clarification needed

Rachel,

Finally I am home and have had time to review the materials you kindly provided on June 6:

\* "4149-14 Encana Permit Cards.pdf", query results.

\* "40-13.pdf", a 7/12/13 AQD permit for Encana, location on Naples Road in Fife Lake, 21 pages, # P0433. The permit shows two condensate storage tanks, two water storage tanks, a glycol dehydrator with gas-fired burner, a flash tank with gas-fired burner, a line heater with gas-fired burner, and a gas-fired reciprocating engine. The limited pollutants are VOC, CO, and NOX. The dehydrator is limited to .5 a ton a year for VOC, the engine to 25 tons for NOX and 22 tons for CO, and the condensate tanks to 6 tons for VOC each. The query results also note other pieces of equipment: a regenerator, condenser, and reboiler. The permit itself says nothing about these. I take it these are different words describing the same complex -- storage tanks, dehydrator, flash tank, line heater, and engine.

\* "74-13.pdf", a 11/4/13 AQD permit for Encana, location on Wood Road in Kalkaska, 23 pages, # P0442. The equipment here is the same as the previous except there are two dehydrators, flash tanks, and heaters. The limited pollutants are the same. The limits are the same except the dehydrators are limited to .4 tons for VOC, and the engine to 19 tons for NOX and 17 tons for CO. The query results note only a regenerator and reboiler.

\* "48-13A.pdf", a 9/20/13 AQD permit for Encana, location on King Road in Grayling, 22 pages, # P0435. The equipment and the limits here are the same as # P0442. The query results note dehydration skids and heaters.

The query results also show "48-13" which you did not send, I assume because it is included within 48-13A.pdf which has the same "P" registration number.

The query results show equipment permitted for # P0278 in 2012 located on Sunset Trail in Kalkaska County, but the actual permits were not provided.

My FOIA request of May 28 via Rick Henderson asked for "the quantities of GHG emissions for Encana's producing Utica-Collingwood wells in 2013." What you have given me shows quantities of pollutants permitted for facilities in 2013, but not:

\* monitoring reports showing the quantities actually emitted (whether above or below the limits),

\* anything about greenhouse emissions (water vapor, CO2, methane, N2O, O3, and CFCs),

\* anything about emissions from the facilities' associated wells, as distinguished from above-ground processing facilities.

I take this to mean DEQ does not limit GHG emissions for oil-gas wells or related facilities, and makes no effort to monitor them. If I am mistaken about this or anything else above please advise.

Finally, though AQD permits for the Sunset Trail facilities were not included in my FOIA of May 28, I now request them. I believe there are at least two (including # P0278), north and south of M-72 in Kalkaska County.

Thank you again for your assistance and forbearance.

Ellis

On 6/12/2014 6:18 PM, Ellis Boal wrote:

Rachel,

Thanks very much. Will be in contact approx June 24.

Ellis

On Mon, June 9, 2014 8:44 am, DEQ-AQD-FOIA wrote:

Ellis,

Not a problem, I can hold it open. I know that OOGM had nothing for your

request and the permits may hold information you need. Just let me know

once you review the information.

Rachel R. McLeod

Departmental Analyst

DEQ-AQD-Enforcement Unit

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From: Ellis Boal [<mailto:ellisboal@voyager.net>]

Sent: Friday, June 06, 2014 5:21 PM

To: DEQ-AQD-FOIA

[Cc:ellisboal@voyager.net](mailto:ellisboal@voyager.net) <<mailto:ellisboal@voyager.net>>

Subject: Re: FOIA 4149-14/Clarification needed

Rachel,

Thank you for your close attention to my request. I am out of my office

till about June 24. I check email occasionally but have no phone till I

return. I am hoping you can hold this inquiry till then, when I will have

a chance to review your attachment to see if it is the type of information

I am looking for.

Thank you again.

Ellis

On Fri, June 6, 2014 2:13 pm, DEQ-AQD-FOIA wrote:

Dear Ellis Boal:

Quality  
SUBJECT: Request for Disclosure of Official Files from Air  
Division (AQD)

This notice is issued in response to your May 28, 2014, request for

information under the Freedom of Information Act, 1976 PA 442, as

amended

(FOIA), received by the AQD on May 30, 2014.

The AQD-Lansing Central Office has the original air permit files

associated with "Encana" in Michigan. I have attached a Permit Cards

detail for your review. I am not sure if you are interested in these

permit files. I estimate about 50.00 or more to scan the files for a

2013

issue date given in your request. Your FOIA stated Utica-Collingwood,

but

I am not positive of this location without giving you the permit files.

The Permit Engineer is out of the office until next week and I was only

able to find 3 permits issued in 2013 and one did make mention of GHG as

a

pollutant. Please let me know if you are interested in the permit files.

The Permit Conditions are attached for your review. I have another staff

member to ask, but need to find out if you know the address of the wells

for Encana.

If you have any questions, need further explanation or would like to

cancel your request for any reason for AQD, please feel free to contact

me.



