



Question	Answer
<p>When your pipeline is down for routine maintenance or leaks or emergency shut-down for 24-48-72 hours - do you need to apply for a flaring permit?</p>	<p>If more than 24 hours you need to apply for an exception to SWR 32 (flaring).</p>
<p>To clarify, if you're only flaring 3 days per month, the entire 30 days in the month are counted toward the 180 day limit?</p>	<p>Yes, assuming the exception period you apply for is for 30 days. For instance, if you request an exception from June 1 through June 30, that is a 30-day period, so all 30 days would count against the 180-day limit. However, if you apply for an exception covering June 1 through June 3rd, then you would only have 3 days counted as that is the period covered by the exception applied for.</p>
<p>For Section 4 - Requested Release - Does the daily release rate need to be well specific based on production or can an operator allocate daily release rates evenly across the total release being requested?</p>	<p>The daily rate should be specific to the property for which the exception applies. For example, if the exception is for an entire oil lease, then the lease flare rate is needed. If it is for a commingle permit, then we will need a daily rate for each lease or gas ID that is associated with the commingle permit.</p>
<p>If you are venting mostly, but there is a chance for maintenance shutdowns and need to flare, do you need to file within 24 hours? Or can you file for a permanent flare to cover this, although you mostly vent?</p>	<p>Venting and flaring are both prohibited by SWR 32. If you are venting, you need to apply for a SWR 32 exception just the same as if you are flaring. An operator may only vent if they can show that they can do so safely. Flaring is always the preferred method.</p>
<p>So, if data is filled in online why is attachment 1 & 2 required? This information is already requested online.</p>	<p>If you are filing online, attachment 1 and 2 are not required since, as you point out, the data is already being provided.</p>

<p>Can you add a feature to allow a print or save pdf of an application you have filed online? And can you add a "duplicate application" feature to allow a submitted application to be copied for additional permits?</p>	<p>We are currently planning to add a print to pdf feature. We have not considered the "duplicate application" feature at this point, but can look at providing it in future releases, which are planned.</p>
<p>Is the search feature only for exceptions filed online with the new system or have older exceptions been scanned and filed and are searchable?</p>	<p>It will only work for exceptions that are filed online.</p>
<p>When seeking an administrative approval to flare less than 50 mcf/day, you get 50 mcf/day for the commingle permit, regardless of how many flare points are within the commingle permit? not 50 mcf/day per flare/vent point, is that correct?</p>	<p>Correct.</p>
<p>Thank you. I had a filing recently and the attachments were required prior to approval. So just making sure for future filings.</p>	<p>I apologize. We had some confusion on that when we were first starting up the online system.</p>
<p>I recently filed swr32 online, but the application was returned and the RRC requested to attach attachment 1. So, in the future, I do not need to attach attachment 1 when filing online?</p>	<p>Correct, I apologize for the confusion.</p>
<p>I have logged into my TRRC page, but my screen does not have the swr32 option at the bottom</p>	<p>You will need to get with your account administrator to have yourself set up for access to the SWR 32 Online System. Note, it is titled "Flare/Vent Exception (SWR32)" and will probably be at the bottom of the list.</p>
<p>I submit applications for multiple operator numbers, but my access is limited to a single operator number and unable to select other operator numbers after login. How can I submit online for multiple operators?</p>	<p>You will need a separate login for each operator.</p>
<p>In the case of a "shared" flare, on oil leases that are not commingled, the system forces an individual permit per lease, not one permit for a flare point since there is no surface commingling</p>	<p>Actually, I believe this would require a rule change as SWR 32 states " Exceptions shall be issued to the operator of a gas well or commission-designated oil lease or commingling point for commingled operations</p>

<p>in place. Please consider making this situation permissible per the rule. Thanks Tim.</p>	<p>and to the operator of a processing plant or other facility subject to this section." The rule does mention vent or flare point, but only in connection with permanent exceptions.</p>
<p>I was asked to provide additional documentation information in the online R-32 application, and it is now requiring me to pay the \$375 fee again. Why should I have to pay again when I'm just completing an application as per RRC request?</p>	<p>If it is the same application, you should not have to pay the fee again. You may need to get with Bill or Nathan to assist you in filing the application.</p>
<p>When filing using a p17 commingle permit number, I have had several sites associate both drilling permits and oil lease numbers with the p17 number. Is there someone to contact when this happens? I would prefer to only have the oil leases associated with a P17 for the requested release rates.</p>	<p>If you are filing for a commingle permit, all properties need to be listed. You may show requested flare volumes as zero for those that you will not need to flare. The system pulls all of the properties associated with the current commingle permit, whether they are drilling permits, gas IDs or oil leases. You may contact the Production Audit Unit to make changes to the properties listed on the P-17/P-17A. Removing drilling permits that have converted to leases can be done over the phone; other changes may require filing a new P-17/P-17A.</p>
<p>For a commingle flare application, do you enter the commingling number or one of the RRC Lease ID numbers></p>	<p>The commingle permit number</p>
<p>In reference to Mark's Henkhaus's questions, would we then have to submit one exception per lease for the same flare point?</p>	<p>Correct.</p>
<p>If a new lease is approved for commingling while a SWR 32 exception is active, do you have to amend the permit to add the extra lease?</p>	<p>Yes.</p>
<p>When avg. less than 50mcf/m for flaring, do you need a flare permit?</p>	<p>That depends. Rule 32(f)(1)(E) states "Low pressure separator gas, not to exceed 15 mcf of hydrocarbon gas per gas well or 50 mcf of hydrocarbon gas per commission-designated oil lease or commingling point for commingled operations, may be released." If your release meets that criteria, then no, an exception is not needed.</p>

<p>Can you search for any filed SWR 32 exceptions by other operators or only ones that you have filed?</p>	<p>Currently only the ones that you have filed. A future release will provide a public portal to view all flare exceptions.</p>
<p>To Mark and Kristin's questions, this is the case when flaring/venting is not associated with gas purchaser upset, correct? In the case of upset, all leases could be associated under the same exception, but using the attachment?</p>	<p>Correct.</p>
<p>Does the system easily track the amount of days left you have within your 180-day allotment per lease or commingle? Or do we need to track that?</p>	<p>If you file for an extension, the system should show how many days you have remaining.</p>
<p>Hypothetically speaking, if I have a facility that has to flare due to the gas plant has issues, and I need to flare for 40 days, and a couple of months later the gas plant has more issues, and I flare again for 40 days. does this apply to the 180 days? and what happens once I reach the 180 of flaring, say towards the end of the year. and the gas plant has more issues where I need to flare but exceed the 180 days?</p>	<p>Presumably, you would file an exception for 40 days for the first occurrence. Since that exception will have expired if another event happens 2 months later, you will need to file for a new exception. The prior exception would not count against the 180 days for the new exception.</p>
<p>What if you have multiple H-9 certificates?</p>	<p>You should list the one with the largest area of exposure. The system does not allow entering more than one certificate at this time.</p>
<p>Is there a website location where an operator can confirm the H9 information and the commingle permit leases?</p>	<p>http://webapps.rrc.state.tx.us/H9/publicquery.xhtml</p>
<p>If I have a flaring event due to a 3rd party pipeline/plant down, will each of those flare points receive a separate exception number? How will that affect if some of the flare points already have an exception number assigned?</p>	<p>If it is a plant disruption you may file one exception for all of the flare points. If you have existing exceptions for some of these flare points, then they would be excluded from the new exception application.</p>
<p>There was a proposed second filing - post-flare report of actual flare volume consumed, etc. Will that be required?</p>	<p>No, that was not approved. Although you will be required to report the volumes on the production report.</p>

<p>Can someone please expand upon Jack P's question and associated reply whereas it seems that if a gas plant had multiple issues throughout the year, only one (the last exception request) would be applicable toward the 180 days maximum.</p>	<p>If you apply for an exception, say for 30 days, then 6 months later you need a new exception, those exceptions are considered separate exception.</p>
<p>So, that particular flare event does not count toward the 180-day allowance per flare point, correct?</p>	<p>If there is a significant lapse of time between exceptions, then they are separate exceptions.</p>
<p>For future questions regarding flaring and all the rules and the online application is there a person and/or phone number that we can call to get more detailed explanations?</p>	<p>You can contact Bill Heard, Nathan Nattin or Tim Speer. Our contact information is on the last slide.</p>
<p>What is the maximum number of days that you can receive for a lease that is vented? This lease is nit near a gas sales line.</p>	<p>180 days. After that you would need to request a hearing.</p>
<p>If we miss a flare event, say for just a few days at the beginning of the month & we add that disposition to the PR report at the end of the next month, what is the consequence? Will we get a 30-day NIC letter, etc., to submit a SWR 32 exception? Or is there an automatic fine, etc.?</p>	<p>You would be in non-compliance for failure to timely file for a SWR 32 Exception. At this point we are not issuing fines, but you may get a non-compliance letter.</p>