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October 6, 2017

**VIA FEDERAL EXPRESS**

Ms. Linda Collart ✓  
Regional Mineral Resources Supervisor  
New York State Department of Environmental Conservation  
Division of Mineral Resources, Region 8  
6274 East Avon-Lima Road  
Avon, New York 14414-9516

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OCT 10 2017

DIVISION OF  
MINERAL RESOURCES

Re: NOTICE OF INCOMPLETE APPLICATIONS  
Tioga Energy Partners, LLC Well Drilling Permit Applications  
Snyder E 1 (API 31-107-30000-00-00)  
Snyder E 1-A (API 31-107-30000-01-00)

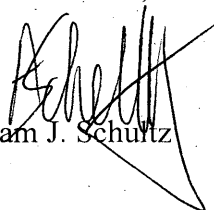
Dear Ms. Collart:

This office represents Tioga Energy Partners, LLC ("TEP"). On August 3, 2017, we submitted a response to the above referenced Notice of Incomplete Applications. Attached to this letter are updated Tables 2B and 2C to Exhibit 1 of the August 3, 2017 response. Kindly replace Tables 2B and 2C with the attached revised tables.

Please feel free to contact me should you have any questions or need anything further.

Very truly yours,

COUCH WHITE, LLP

  
Adam J. Schultz

AJS/elb

Attachments

cc: Carrie W. Friello, Chief Oil & Gas Regulation Section  
Jennifer Maglienti, Counsel

**Table 2B - Snyder E1 & E1-A (DRILLING PROCESS) - Emission Calculations**

Well Flaring*	Nox		CO		VOC		PM		SO2		CO2	
	lb/hr (PTE)	Act. total lb	lb/hr (PTE)	Act. total lb	lb/hr (PTE)	Act. total lb	lb/hr (PTE)	Act. total lb	lb/hr (PTE)	Act. total lb	lb/hr (PTE)	Act. total lbs
E1 & E1-A methane	0.340	4.404	1.550	20.079	0.003	0.042	0.037	0.483	0.003	0.038	584.89	7,577

\*Drill Rig Flare emissions calculated based on AP-42 factors and the estimated volumes of methane to be processed during drilling operations.

Engines **	Nox		CO		VOC		PM		SO2		CO2	
	lb/hr (PTE)	Act. total lb	lb/hr (PTE)	Act. total lb	lb/hr (PTE)	Act. total lb	lb/hr (PTE)	Act. total lb	lb/hr (PTE)	Act. total lb	lb/hr (PTE)	Act. total lbs
Drilling Rig	23.211	13,926	12.693	7,616	1.555	933	0.725	435	0.892	535	2559.0	1,535,376
Living Quarters	1.427	1,199	1.081	908	0.325	273	0.065	54	0.270	226	151.2	127,029
Trash Pump	0.925	32	0.616	22	0.185	6	0.049	2	0.154	5	86.3	3,019
Light Tower	0.370	155	0.271	114	0.074	31	0.030	12	0.062	26	34.5	14,490

\*\*Engine emissions calculated based on 40 CFR 89 Table 1 and AP-42 factors - See Table 6 & 7 for Engine

Emission Data used to generate emissions

Total Drilling Emissions

Drilling Emissions	Nox		CO		VOC		PM		SO2		CO2	
	Act. total lb	Act. total lb	Act. total lb	Act. total lb	Act. total lb	Act. total lb	Act. total lb	Act. total lb	Act. total lb	Act. total lbs		
Drill Rig Flare Source	4	20	0	0	0	0	0	0	0	7,577		
Non-road Engines	15,313	8,659	1,244	504	793	1,679,914						
Subtotal Emissions	15,317	8,680	1,244	504	793	1,687,490						

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Table 2C - Drill Rig Flare Methane Emissions

Air Contaminant	lb/mmBTU	lb/hr (PTE)	Reference
NOx	0.0680	0.34	AP-42 Table 13.5-1 (New AP-42 does not have NOx)
CO	0.3100	1.55	AP-42 Table 13.5-1
VOC	0.0006	0.00	AP-42 Table 1.4-1 (New AP-42 , VOC factor) where VOC=0.66 lb/mmscf
PMTOT	0.0075	0.04	AP-42 Table 1.4-2 PMTOT=7.6 lb/mmscf
SO2	0.0006	0.00	AP-42 Table 1.4-2 (0.1S) where S=1grain/100scf where SO2=0.6S lb/mi
CO2	116.9773	584.89	40 CFR 98.253 Table C-1 GHG CO2 NG Flare emission 53.07 kg/mmBTU
Methane	1020	btu/cf	BTU content of natural gas

Note: Drill Rig Flare lb/hr PTE calculations performed using Drill Rig Flare maximum rated capacity of ~ 5mmBTU/hr (0.1 mmSCFD)

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