Dolores:

This really is not much to work with.  However...

1.  In the Valley, fugitive monitoring is currently conducted for all sources > 30 API (cutoff for Rule 4409).  Therefore, if this is mandated as a BPS, will current practices be included in the determination?  If so, that will provide fugitive I&M for sources < 30 API.  Also,Are these BPS for existing operations or for planned projects (i.e. - new steam flood).  How are the BPS going to be implemented?

2.  Except for small producers, you will not find a great deal of these tanks.  Must be careful when making demands on the independents as the present exemptions are basically there in the rules for them (via Les Clark).  Again,will operators get credit for what they are currently doing?  Above and beyond?

3.  I am not sure I know what you are talking about.  Steam drive wells?

4.  What are you going to do about a floating roof?  Options?

Concerns:

1.  BPS ultimately become regulations.  This worries more than a small number of operators.  Regulation through Policy is a disease.
2.  Do operators receive credit for current activities under a BPS?
3.  In other words, is BPS only for new projects?  Can existing practices be utilized to supplement?

WCI is currently working on gas-actuated controllers.  Are there other topics members can think of.  Are you only looking at fugitives or combustion sources as well although not much to do here either).  Where is gas vented?  Most of these sources are already controlled.

PS - There was nothing really to comment on.  We can sit down and develop something more substantive and distribute to any who have signed up.  Then need to have meetings at specific times (telephone or otherwise) and set definitive schedules for deliverables.  Need to integrate into and take credit for existing operations rather than creating more requirements.

Let me know what you think?

Dennis