

Exhibit A

**BEFORE THE ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING**

In the Matter of:)
Citation Oil & Gas Corp.) Docket No. 20-2601
Air Quality Permit No. P0027427)
Through Permit No. P0027433)

**DECLARATION OF BOB REDWEIK IN SUPPORT OF CITATION
OIL & GAS CORP.'S MOTION TO STAY PERMIT CONDITIONS**

I, Robert J. Redweik, declare and state that the following is true and correct to the best of my knowledge, based on my personal knowledge:

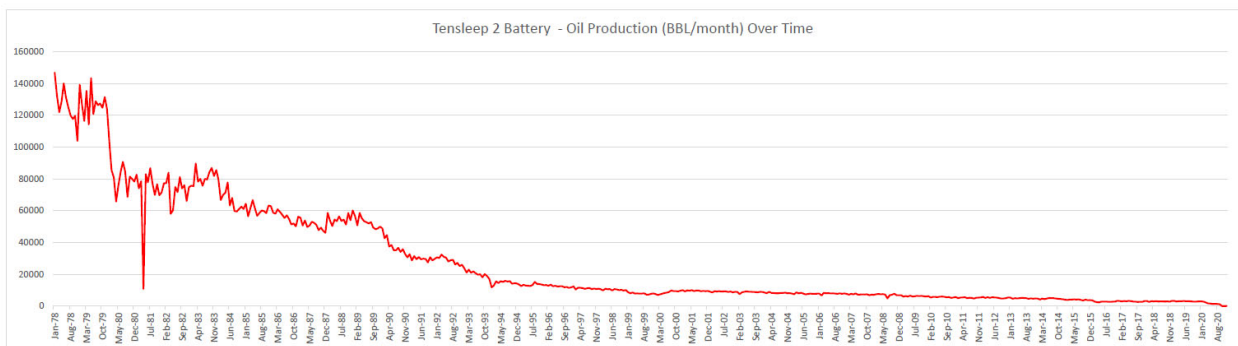
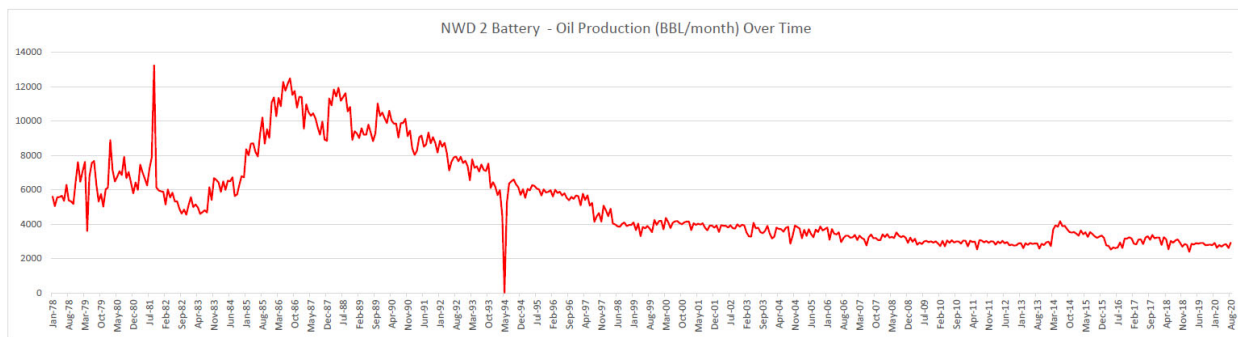
1. I am currently the Director of Environment Health Safety (“EHS”) and Regulatory for Citation Oil & Gas Corp. (“Citation”). I have nearly 40 years of experience in the oil and gas industry, the majority of which has involved management of environmental and regulatory matters.
2. In my role as Director of EHS/Regulatory, I manage environmental compliance for all of Citation’s facilities in Wyoming, Utah, Colorado, Montana, North Dakota, South Dakota, Kansas, Nebraska, Illinois, Indiana, New Mexico, Texas, and Oklahoma. Citation currently has 30 operating facilities in Wyoming, not including individual oil and gas well sites. As part of my responsibilities, I oversee compliance with state and federal air quality regulatory requirements, including assessment of permitting applicability for Citation’s facilities.
3. This declaration is submitted in support of Citation’s Motion to Stay Permit Conditions.

OVERVIEW OF CITATION’S FACILITIES SUBJECT TO APPEAL

4. I am familiar with the history and have reviewed the production status of Citation’s facilities subject to this appeal: Dallas Dome Tank Battery (F003333), Embar 3 Tank Battery

(F006413), NWD 1 Tank Battery (F004577), NWD 2 Tank Battery (F004576), Tensleep 1 Tank Battery (F004571), Tensleep 2 Tank Battery (F004572), and Embar 1 Tank Battery (F004573).

5. The above facilities are each oil tank batteries and associated equipment that service vertical wells drilled as early as 1900. Two of these facilities—Tensleep 2 and NWD 2—were constructed in 1969 and none of these facilities were constructed in the past 20 years. Based on my review of production data associated with these facilities, production to these facilities has been steadily declining over the past 30 years. The wells that produce to these facilities are generally referred to as stripper wells based on their individual low production volumes, typically less than 15 barrels of oil per day. Although a few new wells have been drilled and directed to these facilities, and other wells have been subject to workovers, the increase in production resulting from these events was insignificant. Production increases never approached historic levels and production quickly declined over a matter of months. The trend is illustrated below at the NWD 2 Tank Battery and the Tensleep 2 Tank Battery:



6. Emissions at these facilities necessarily track production and therefore emissions on a year-over-year basis did not exceed previous annual emissions associated with the historic oil production. Current estimated potential to emit of volatile organic compounds (“VOC”) from these facilities is as follows:

- a. Tensleep 1: 5.73 tpy
- b. Tensleep 2: 5.98 tpy
- c. Dallas Dome: 3.66 tpy
- d. Embar 1: 4.71 tpy
- e. Embar 3: 6.68 tpy
- f. NWD 1: 5.48 tpy
- g. NWD 2: 4.34 tpy

7. None of these facilities are subject to the federal requirements found at 40 CFR Part 60, Subpart OOOO or Subpart OOOOa, which regulate VOC emissions from oil and gas production facilities. This is because these facilities were constructed prior to the 2011 applicability date for Subpart OOOO and the 2015 applicability date for Subpart OOOOa and were not modified or reconstructed as defined in the relevant standards after those dates.

8. Therefore, Citation’s facilities would not be required to comply with the fugitive emissions monitoring provisions of Subpart OOOOa but for the fugitive monitoring conditions as set forth in Permit Nos. P0027427 through P0027433.

IMPACTS OF FUGITIVE EMISSIONS MONITORING CONDITIONS ON CITATION

9. Compliance with the fugitive emissions monitoring requirements would require Citation to begin work prior to the completion of this appeal.

10. Compliance with these requirements requires that Citation immediately hire technical support to begin identifying fugitive emissions components at each of the subject facilities, developing an emissions monitoring plan, and undertaking site visits.
11. These facilities and associated wells contain thousands of individual fugitive emissions components, including valves, connectors, flanges, pressure relief valves, etc.
12. In order to identify each of these components, Citation must hire a consultant to undertake a separate multi-day review of each facility. Citation anticipates that creating an inventory of fugitive emissions components would cost approximately \$20,000 per facility for a total of approximately \$140,000.
13. Once the components are identified, Citation must develop an emissions monitoring plan as set forth in Subpart OOOOa, including a comprehensive database to track each component. Citation also must develop and implement monitoring schedules, training programs, and recordkeeping at each of these facilities. Citation anticipates that this effort will cost approximately \$25,000 in total.
14. In addition, Citation must expend significant time and resources training or hiring employees or contractors, obtaining additional equipment, and visiting discrete or remote locations during the winter months. Citation anticipates that each site visit to perform monitoring at each separate facility would cost approximately \$4,500 for a total of \$31,500 and that site visits would be necessary during the pendency of this appeal.
15. To the extent that emissions leaks are identified, Citation must physically tag the components with unique identification numbers and repair or replace the leaking components.

16. Once the monitoring program is established, Citation will carry continuing costs associated with required quarterly field audits of all fugitive components at each facility.

17. The burden associated with this effort is exacerbated by the ongoing COVID-19 pandemic, which is resulting in difficulties in managing resources necessary to achieve compliance.

18. If Citation prevails in this appeal and the permit conditions are vacated, all of Citation's resources spent achieving compliance will be wasted.

I declare under penalty of perjury that the foregoing is true and correct.



Robert J. Redweik

Dated: December 2, 2020