EXHIBIT A

DECLARATION OF ROBERT J. REDWEIK

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 ROBERT J. REDWEIK IN SUPPORT OF CITATION OIL & GAS CORP.'S RESPONSE TO DEQ'S CROSS MOTION FOR SUMMARY JUDGMENT AND REPLY

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").
2. I started at Citation in October 2017, and have worked there for 3 years.
3. In addition, 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.
4. In my role as Director of EHS/Regulatory at Citation, 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.
5. This declaration is submitted in support of Citation's Response to DEQ's Cross Motion for Summary Judgment and Reply.

OVERVIEW OF CITATION'S FACILITIES SUBJECT TO APPEAL

1. 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).
2. 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 the other 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.
3. Current estimated potential to emit of volatile organic compounds ("VOC") from these facilities is as follows:

Facility Name	Emissions in November 2020 Applications
Dallas Dome	3.66 tpy
Embar 1	4.71 tpy
Embar 3	6.68 tpy
NWD 1	5.48 tpy
NWD 2	4.34 tpy
Tensleep 1	5.73 tpy
Tensleep 2	5.97 tpy

4. DEQ alleges modifications occurred at these facilities, as follows:

Facility Name	Alleged Modification	Date of Alleged Modification
Dallas Dome	the **addition** of the Barber 89 well; the **addition** of the Barber 49R and Barber 88 wells;	10/01/2014 11/01/2014
Embar 1	the **addition** of the LBB 386 well;	09/20/2008
Embar 3	the **workover** of the LBB DSU 211 well;	07/25/2011
NWD 1	the **addition** of the NWD 42 well;	05/31/2014
NWD 2	the **addition** of the NWD 43 well;	03/24/2014
Tensleep 1	the **workover** of the LBB 178H well;	09/02/2012
Tensleep 2	**fracture treating** of the LBB DSU C-052236 172 well;	08/10/2010

5. A workover of an existing well involves the process of performing major maintenance or remedial treatments on an oil or gas well, and typically is conducted to return a well to some pre-workover production level and/or extend the life of the well.
6. The fracture treating of an existing well produces fractures in the rock formation around the wellbore that will hopefully stimulate the flow of natural gas or oil. Additionally, as defined by EPA, hydraulic fracturing requires the flowback of fluid from the reservoir.
7. In my experience, the workover of a well or the fracture treating of a well does not necessarily result in a return to a well's original production rates or fluid ratios, particularly with respect to older wells with decades of production decline. For example,

when activities such as these are conducted on wells that are already marginal, the goal is to maintain the overall status quo levels of production and extend the production curve into the future by reducing the decline.

8. Similarly, when wells are added to facilities made up of older wells with declining production, particularly stripper wells, these new wells make up for declining production and are not intended to increase production to original levels. Any increase in production will be de minimis when compared to the original production levels and will typically be short-lived.
9. Although a handful of new wells have been drilled and directed to Citation's tank batteries as set forth above, and other wells have been subject to workovers and fracture treatment, the increase in production resulting from these events was insignificant and declined relatively quickly.
10. For example, at Embar 1, a new well was added in September 2008. Cumulative production increased shortly thereafter, but approximately 5 months later production had returned to historic levels prior to the addition.
11. For example, at NWD 1, a new well was added in May 2014. Cumulative production increased after the addition the well, but within 9 months of the increase production fell below the pre-addition level. A few months later, production was consistently below historic levels prior to the addition.
12. Emissions at these facilities necessarily track production. Consequently, as a result of the declines in production that eventually occurred after these events, emissions on a year-over-year basis would not have exceeded previous annual emissions.

13. It is for these reasons that Citation in good faith determined that the facilities were not modified, and did not contemporaneously apply for permits for the new wells that were drilled and directed to these facilities, and for the other wells that were subject to workovers and/or fracture treatment.

OVERVIEW OF CITATION'S PERMIT APPLICATION PROCESS FOR THE FACILITIES SUBJECT TO APPEAL

14. Based on findings of our Environmental Audit under Wyoming law, Citation submitted operating permit applications on January 30, 2020 designed to ensure that the existing equipment and facility was accurately reflected in the permit.
15. Citation included why it was seeking permits in each application under the purpose heading: "Citation is submitting this New Source Review air permit application for the approval of an existing site. As a result of Citation's audit and the State of Wyoming's approval, this application authorizes the site based on operations as existing today; no construction applications or modifications to existing permits are being proposed."
16. As the AQD was already aware, each of these facilities had existing waivers or construction permits: Dallas Dome (waivers issued 1999, 2010); Embar 1 (waiver issued 1999); Embar 3 (construction permit issued in 1999); NWD 1 (waiver issued in 1998); NWD 2 (waiver issued in 1998); Tensleep 1 (waiver issued in 1999); and Tensleep 2 (construction permit issued in 2000).
17. Consistent with Citation's intent to obtain operating permits for existing sources, we did not include information related to a modification or construction in our applications since the AQD was already aware that these facilities had permits. For example, in each application under Section II, "Specific Air Contaminant Source Information" Citation left

the following question blank: “Source Installation or Modification Schedule – Select reason(s) for this emissions unit being included in this application (must be completed regardless of date of installation or modification).” Rather, we explained, “As a result of Citation's audit, disclosure and subsequent findings, the State of Wyoming has approved Citation's request to submit a new permit application authorizing these emissions regardless of whether previously authorized, subject to a waiver, or not authorized.”

18. When Citation submitted these applications, we did not intend to apply for permits for a modification. It is within this context that we provided only the emission data required for the requisite equipment requiring operating permits. Moreover, we did not prepare a BACT worksheet in conjunction with our applications.
19. On February 24, 2020 the Air Quality Division (“AQD”) sent Citation Permit Application Completeness Notices for each permit. These letters notified us that that the AQD found our applications to be complete.
20. Based on the Completeness Notices that Citation received, it was our understanding that the AQD required no further information related to these facilities. Further, although the Completeness Notices indicated the AQD still retained the ability to seek other information or clarification it deems necessary, we received no such request for new or additional information from the AQD prior to the draft or final permits being issued.
21. Per the Permit Application Analyses dated April 2020, the AQD states that “Per the 2018 C6 S2 Guidance Presumptive BACT requirements for fugitive emissions, Citation Oil & Gas Corporation shall follow the fugitive emission monitoring requirements under 40 CFR part 60, Subpart OOOOa for fugitive VOC emissions from a production site as published in the federal register on June 3, 2016 (Federal Register Vol. 81 pg. 35824-

35941). However, the 2018 C6 S2 Guidance states that "The Presumptive BACT permitting requirements under this Guidance apply to facilities with associated wells that have a first date of production (FDOP) on/after **February 1, 2019** and to facilities with a modification occurring on/after **February 1, 2019**." Therefore, the AQD applied Presumptive BACT (PBACT) requirements in our permits which the same 2018 C6 S2 Guidance document clearly states is not applicable since our facilities did not have a first date of production on/after February 1, 2019 and were not modified on/after February 1, 2019.

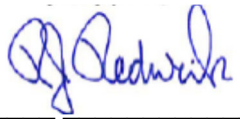
22. In April 2020, an employee of Citation received notices of the draft permits. Due to an internal communications failure, this employee did not forward the notices to anyone else at Citation, including myself. Further notice regarding the status of these permit applications was not provided when this employee's employment terminated.
23. Because I was not aware of the status of the draft permits, Citation did not submit comments objecting to the permit conditions contained therein or the allegation that these facilities had been modified.

OVERVIEW OF SUBSEQUENT DISCUSSIONS WITH DEQ

24. After the final permits were issued for the facilities subject to this challenge, we entered into discussions with DEQ regarding our position. Namely, that the facilities were not modified and therefore should not be subject to the burdensome conditions in the PBACT AQD applied.
25. DEQ refused our request to provide them with data regarding production and emissions at these facilities after the alleged modifications demonstrating that no increase in

emissions had occurred and the AQD never requested any additional information regarding our facilities or their emissions.

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



Executed on: January 12, 2021

Robert J. Redweik Date

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