NMED AIR QUALITY
NSR SIGNIFICANT REVISION APPLICATION
EL PASO NATURAL GAS COMPANY, L.L.C.
Bluewater Compressor Station

Prepared By:
Wade Janecek – Senior EHS Engineer

El Paso Natural Gas Company, L.L.C.
1667 Cole Blvd.
Suite 300
Lakewood, CO 80401
(303) 914-7602

Adam Erenstein – Manager of Consulting Services

TRINITY CONSULTANTS
9400 Holly Ave NE
Bldg 3, Suite B
Albuquerque, NM 87122
(505) 266-6611

March 2025

Project 243201.0153

Trinity Consultants

Trinity Consultants
9400 Holly Ave NE, Bldg 3, Ste B, Albuquerque, NM 87122 / P 505.266.6611 / **trinityconsultants.com**

March 21, 2025

Permit Programs Manager
NMED Air Quality Bureau
525 Camino de los Marques, Suite 1
Santa Fe, NM 87505

RE: Application for Significant Revision to NSR Permit No. 3004-M1
El Paso Natural Gas Company, L.L.C. – Bluewater Compressor Station

Dear Permit Programs Manager:

On behalf of El Paso Natural Gas Company, L.L.C. (EPNG), Trinity Consultants is submitting this application for an NSR Significant Revision for the Bluewater Compressor Station. This facility is located approximately 0.5 miles south of Thoreau, New Mexico in McKinley County and compresses natural gas for transportation purposes. Bluewater Compressor station is currently authorized to operate under NSR Permit No. 3004-M1.

The format and content of this application are consistent with the Bureau's current policy regarding NSR applications; it is a complete application package using the most current application forms. Enclosed is one hard copy and one working copy of the application, including the original certification page and an application check. Please feel free to contact me at (505) 266-6611 or by email at aerenstein@trinityconsultants.com if you have any questions regarding this application. Alternatively, you may contact Wade Janecek with El Paso Natural Gas Company, L.L.C. at (505) 269-2794 or by email at Wade_Janecek@kindermorgan.com

Sincerely,

TRINITY CONSULTANTS

Adam Erenstein
Manager of Consulting Services

cc: Wade Janecek (El Paso Natural Gas Company, L.L.C.)
Trinity Project File 243201.0153

Air Permit Application
Compliance History Disclosure Form

Pursuant to Subsection 74-2-7(S) of the New Mexico Air Quality Control Act ("AQCA"), NMSA §§ 74-2-1 to -17, the New Mexico Environment Department ("Department") may deny any permit application or revoke any permit issued pursuant to the AQCA if, within ten years immediately preceding the date of submission of the permit application, the applicant met any one of the criteria outlined below. In order for the Department to deem an air permit application administratively complete, or issue an air permit for those permits without an administrative completeness determination process, the applicant must complete this Compliance History Disclosure Form as specified in Subsection 74-2-7(P). An existing permit holder (permit issued prior to June 18, 2021) shall provide this Compliance History Disclosure Form to the Department upon request.

Permittee/Applicant Company Name		**Expected Application Submittal Date**
El Paso Natural Gas Company, L.L.C.		March 21, 2025
Permittee/Company Contact	**Phone**	**Email**
Wade Janecek	(303) 914-7602	Wade_Janecek@kindermorgan.com

	Within the 10 years preceding the expected date of submittal of the application, has the permittee or applicant:	
1	Knowingly misrepresented a material fact in an application for a permit?	☐ Yes ☒ No
2	Refused to disclose information required by the provisions of the New Mexico Air Quality Control Act?	☐ Yes ☒ No
3	Been convicted of a felony related to environmental crime in any court of any state or the United States?	☐ Yes ☒ No
4	Been convicted of a crime defined by state or federal statute as involving or being in restraint of trade, price fixing, bribery, or fraud in any court of any state or the United States?	☐ Yes ☒ No
5a	Constructed or operated any facility for which a permit was sought, including the current facility, without the required air quality permit(s) under 20.2.70 NMAC, 20.2.72 NMAC, 20.2.74 NMAC, 20.2.79 NMAC, or 20.2.84 NMAC?	☐ Yes ☒ No
5b	If "No" to question 5a, go to question 6. If "Yes" to question 5a, state whether each facility that was constructed or operated without the required air quality permit met at least one of the following exceptions: a. The unpermitted facility was discovered after acquisition during a timely environmental audit that was authorized by the Department; or b. The operator of the facility estimated that the facility's emissions would not require an air permit, **and** the operator applied for an air permit within 30 calendar days of discovering that an air permit was required for the facility.	☐ Yes ☐ No
6	Had any permit revoked or permanently suspended for cause under the environmental laws of any state or the United States?	☐ Yes ☒ No
7	For each "yes" answer, please provide an explanation and documentation.	

Mail Application To:		**For Department use only:**
New Mexico Environment Department Air Quality Bureau Permits Section 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico, 87505 Phone: (505) 476-4300 Fax: (505) 476-4375 www.env.nm.gov/aqb		

Universal Air Quality Permit Application

Use this application for NOI, NSR, or Title V sources.

Use this application for: the initial application, modifications, technical revisions, and renewals. For technical revisions, complete Sections, 1-A, 1-B, 2-E, 3, 9 and any other sections that are relevant to the requested action; coordination with the Air Quality Bureau permit staff prior to submittal is encouraged to clarify submittal requirements and to determine if more or less than these sections of the application are needed. Use this application for streamline permits as well.

This application is submitted as (check all that apply)**:** ☐ Request for a No Permit Required Determination (no fee)
☐ **Updating** an application currently under NMED review. Include this page and all pages that are being updated (no fee required).
Construction Status: ☐ Not Constructed ☑ Existing Permitted (or NOI) Facility ☐ Existing Non-permitted (or NOI) Facility
Minor Source: ☐ a NOI 20.2.73 NMAC ☑ 20.2.72 NMAC application or revision ☐ 20.2.72.300 NMAC Streamline application
Title V Source: ☐ Title V (new) ☐ Title V renewal ☐ TV minor mod. ☐ TV significant mod. TV Acid Rain: ☐ New ☐ Renewal
PSD Major Source: ☐ PSD major source (new) ☐ minor modification to a PSD source ☐ a PSD major modification

Acknowledgements:

☑ I acknowledge that a pre-application meeting is available to me upon request. ☐ Title V Operating, Title IV Acid Rain, and NPR applications have no fees.

☑ $500 NSR application Filing Fee enclosed OR ☐ The full permit fee associated with 10 fee points (required w/ streamline applications).

☑ Check No.: 660503 in the amount of $500

☑ I acknowledge the required submittal format for the hard copy application is printed double sided 'head-to-toe', 2-hole punched (except the Sect. 2 landscape tables is printed 'head-to-head'), numbered tab separators. Incl. a copy of the check on a separate page.

☑ I acknowledge there is an annual fee for permits in addition to the permit review fee: www.env.nm.gov/air-quality/permit-fees-2/.

☐ This facility qualifies for the small business fee reduction per 20.2.75.11.C. NMAC. The full $500.00 filing fee is included with this application and I understand the fee reduction will be calculated in the balance due invoice. The Small Business Certification Form has been previously submitted or is included with this application. (Small Business Environmental Assistance Program Information: www.env.nm.gov/air-quality/small-biz-eap-2/.)

Citation: Please provide the **low level citation** under which this application is being submitted: **20.2.72.219.D.(1).(a) NMAC**
(e.g. application for a new minor source would be 20.2.72.200.A NMAC, one example for a Technical Permit Revision is 20.2.72.219.B.1.b NMAC, a Title V acid rain application would be: 20.2.70.200.C NMAC)

Section 1 – Facility Information

Section 1-A: Company Information

		AI # if known (see 1st 3 to 5 #s of permit IDEA ID No.): 882	Updating Permit/NOI #: 3001-M1
1	Facility Name: Bluewater Compressor Station	Plant primary SIC Code (4 digits): 4922	
		Plant NAIC code (6 digits): 486210	
a	Facility Street Address (If no facility street address, provide directions from a prominent landmark): Located in Township 14 North, Range 13 West, Section 33, approximately one mile South of Thoreau, New Mexico in McKinley County.		
2	Plant Operator Company Name: El Paso Natural Gas Company, L.L.C.	Phone/Fax: (505) 831-7763 / (505) 831-7734	
a	Plant Operator Address: 2 N. Nevada Ave., Colorado Springs, CO 80903		
b	Plant Operator's New Mexico Corporate ID or Tax ID: 46-0809216		

3	Plant Owner(s) name(s): El Paso Natural Gas Company, L.L.C.	Phone/Fax: (505) 831-7763 / (505) 831-7734
a	Plant Owner(s) Mailing Address(s): 2 N. Nevada Ave., Colorado Springs, CO 80903	
4	Bill To (Company): El Paso Natural Gas Company, L.L.C.	Phone/Fax: (505) 831-7763 / (505) 831-7734
a	Mailing Address: 2 N. Nevada Ave., Colorado Springs, CO 80903	E-mail: Wade_Janecek@kindermorgan.com
5	☐ Preparer: ☑ Consultant: Adam Erenstein	Phone/Fax: (505) 266-6611
a	Mailing Address: 9400 Holly Ave NE, Bldg 3, Ste B, Albuquerque, NM 87122	E-mail: aerenstein@trinityconsultants.com
6	Plant Operator Contact: Rory Taylor	Phone/Fax: (505) 722-3634 / (505) 206-9256
a	Address: 84 El Paso Circle, Gallup, NM 87301	E-mail: Rory_Taylor@kindermorgan.com
7	Air Permit Contact: Wade Janecek	Title: Sr. EHS Engineer
a	E-mail: Wade_Janecek@kindermorgan.com	Phone/Fax: (303) 914-7602 / (970) 270-5584
b	Mailing Address: 1667 Cole Blvd. Suite 300, Lakewood, CO 80401	
c	The designated Air permit Contact will receive all official correspondence (i.e. letters, permits) from the Air Quality Bureau.	

Section 1-B: Current Facility Status

1.a	Has this facility already been constructed? ☑ Yes ☐ No	1.b If yes to question 1.a, is it currently operating in New Mexico? ☑ Yes ☐ No
2	If yes to question 1.a, was the existing facility subject to a Notice of Intent (NOI) (20.2.73 NMAC) before submittal of this application? ☐ Yes ☑ No	If yes to question 1.a, was the existing facility subject to a construction permit (20.2.72 NMAC) before submittal of this application? ☑ Yes ☐ No
3	Is the facility currently shut down? ☐ Yes ☑ No	If yes, give month and year of shut down (MM/YY): N/A
4	Was this facility constructed before 8/31/1972 and continuously operated since 1972? ☑ Yes ☐ No	
5	If Yes to question 3, has this facility been modified (see 20.2.72.7.P NMAC) or the capacity increased since 8/31/1972? ☑Yes ☐No ☐N/A	
6	Does this facility have a Title V operating permit (20.2.70 NMAC)? ☑ Yes ☐ No	If yes, the permit No. is: P139-R4
7	Has this facility been issued a No Permit Required (NPR)? ☐ Yes ☑ No	If yes, the NPR No. is: N/A
8	Has this facility been issued a Notice of Intent (NOI)? ☐ Yes ☑ No	If yes, the NOI No. is: N/A
9	Does this facility have a construction permit (20.2.72/20.2.74 NMAC)? ☑ Yes ☐ No	If yes, the permit No. is: 3004-M1
10	Is this facility registered under a General permit (GCP-1, GCP-2, etc.)? ☐ Yes ☑ No	If yes, the register No. is: N/A

Section 1-C: Facility Input Capacity & Production Rate

1	What is the facility's maximum input capacity, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: 33.3 MMscf	Daily: 800 MMscf	Annually: 292,000 MMscf
b	Proposed	Hourly: 33.3 MMscf	Daily: 800 MMscf	Annually: 292,000 MMscf
2	What is the facility's maximum production rate, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: 33.3 MMscf	Daily: 800 MMscf	Annually: 292,000 MMscf
b	Proposed	Hourly: 33.3 MMscf	Daily: 800 MMscf	Annually: 292,000 MMscf

Section 1-D: Facility Location Information

1	Section: 33	Range: 13W	Township: 14N	County: McKinley	Elevation (ft): 7,160
2	UTM Zone: ☑ 12 or ☐ 13			Datum: ☐ NAD 27 ☐ NAD 83 ☑ WGS 84	
a	UTM E (in meters, to nearest 10 meters): 751,770			UTM N (in meters, to nearest 10 meters): 3,920,250	
b	**AND** Latitude (deg., min., sec.): 35°23'37.7" N			Longitude (deg., min., sec.): 108°13'40.6" W	
3	Name and zip code of nearest New Mexico town: Thoreau, 87323				
4	Detailed Driving Instructions from nearest NM town (attach a road map if necessary): From the intersection of NM-371 and 1st St in Thoreau, NM, head south on NM-371 for 0.2miles. The facility will be on the right.				
5	The facility is 0.5 miles South of Thoreau, NM.				
6	Status of land at facility (check one): ☑ Private ☐ Indian/Pueblo ☐ Federal BLM ☐ Federal Forest Service ☐ Other (specify)				
7	List all municipalities, Indian tribes, and counties within a ten (10) mile radius (20.2.72.203.B.2 NMAC) of the property on which the facility is proposed to be constructed or operated: Mckinley County, NM; Cibola County, NM.				
8	**20.2.72** NMAC applications **only**: Will the property on which the facility is proposed to be constructed or operated be closer than 50 km (31 miles) to other states, Bernalillo County, or a Class I area (see www.env.nm.gov/air-quality/modeling-publications/)? ☐ Yes ☑ No (20.2.72.206.A.7 NMAC) If yes, list all with corresponding distances in kilometers:				
9	Name nearest Class I area: Petrified Forest National Park				
10	Shortest distance (in km) from facility boundary to the boundary of the nearest Class I area (to the nearest 10 meters): 135.1				
11	Distance (meters) from the perimeter of the Area of Operations (AO is defined as the plant site inclusive of all disturbed lands, including mining overburden removal areas) to nearest residence, school or occupied structure: 310 meters				
12	Method(s) used to delineate the Restricted Area: Continuous Fencing "**Restricted Area**" is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area.				
13	Does the owner/operator intend to operate this source as a portable stationary source as defined in 20.2.72.7.X NMAC? ☐ Yes ☑ No A portable stationary source is not a mobile source, such as an automobile, but a source that can be installed permanently at one location or that can be re-installed at various locations, such as a hot mix asphalt plant that is moved to different job sites.				
14	Will this facility operate in conjunction with other air regulated parties on the same property? ☒ No ☐ Yes If yes, what is the name and permit number (if known) of the other facility?				

Section 1-E: Proposed Operating Schedule (The 1-E.1 & 1-E.2 operating schedules may become conditions in the permit.)

1	Facility **maximum** operating ($\frac{\text{hours}}{\text{day}}$): 24	($\frac{\text{days}}{\text{week}}$): 7	($\frac{\text{weeks}}{\text{year}}$): 52	($\frac{\text{hours}}{\text{year}}$): 8,760		
2	Facility's maximum daily operating schedule (if less than 24 $\frac{\text{hours}}{\text{day}}$)? Start: N/A	☐AM ☐PM	End: N/A	☐AM ☐PM		
3	Month and year of anticipated start of construction: N/A					
4	Month and year of anticipated construction completion: N/A					
5	Month and year of anticipated startup of new or modified facility: N/A					
6	Will this facility operate at this site for more than one year? ☑ Yes ☐ No					

Section 1-F: Other Facility Information

1	Are there any current Notice of Violations (NOV), compliance orders, or any other compliance or enforcement issues related to this facility? ☐ Yes ☑ No If yes, specify: N/A	
a	If yes, NOV date or description of issue: N/A	NOV Tracking No: N/A

b	Is this application in response to any issue listed in 1-F, 1 or 1a above? ☐ Yes ☑ No If Yes, provide the 1c & 1d info below:		
c	Document Title: N/A	Date: N/A	Requirement # (or page # and paragraph #): N/A
d	Provide the required text to be inserted in this permit: N/A		
2	Is air quality dispersion modeling or modeling waiver being submitted with this application? ☑ Yes ☐ No		
3	Does this facility require an "Air Toxics" permit under 20.2.72.400 NMAC & 20.2.72.502, Tables A and/or B? ☐ Yes ☑ No		
4	Will this facility be a source of federal Hazardous Air Pollutants (HAP)? ☑ Yes ☐ No		
a	If Yes, what type of source? ☐ **Major** (☐ ≥10 tpy of any single HAP **OR** ☐ ≥25 tpy of any combination of HAPS) **OR** ☑ **Minor** (☑ <10 tpy of any single HAP **AND** ☑ <25 tpy of any combination of HAPS)		
5	Is any unit exempt under 20.2.72.202.B.3 NMAC? ☑ Yes ☐ No		
a	If yes, include the name of company providing commercial electric power to the facility: _El Paso Natural Gas Company, L.L.C.__ Commercial power is purchased from a commercial utility company, which specifically does not include power generated on site for the sole purpose of the user.		

Section 1-G: Streamline Application (This section applies to 20.2.72.300 NMAC Streamline applications only)

1	☐ I have filled out Section 18, "Addendum for Streamline Applications." ☑ N/A (This is not a Streamline application.)

Section 1-H: Current Title V Information - Required for all applications from TV Sources

(Title V-source required information for all applications submitted pursuant to 20.2.72 NMAC (Minor Construction Permits), or 20.2.74/20.2.79 NMAC (Major PSD/NNSR applications), and/or 20.2.70 NMAC (Title V))

1	Responsible Official (R.O.) (20.2.70.300.D.2 NMAC): Ted Meinhold		Phone: (714) 420-2765
a	R.O. Title: Vice President of Operations	R.O. e-mail: ted_meinhold@kindermorganc.com	
b	R. O. Address: 1001 Louisiana, Houston, TX 77002		
2	Alternate Responsible Official (20.2.70.300.D.2 NMAC): Edward Rasbold		Phone: (520) 663-4242
a	A. R.O. Title: Director of Operations	A. R.O. e-mail: edward_rasbold@kindermorgan.com	
b	A. R. O. Address: 5151 East Broadway Blvd. Suite 1680, Tucson, AZ 85711		
3	Company's Corporate or Partnership Relationship to any other Air Quality Permittee (List the names of any companies that have operating (20.2.70 NMAC) permits and with whom the applicant for this permit has a corporate or partnership relationship): N/A		
4	Name of Parent Company ("Parent Company" means the primary name of the organization that owns the company to be permitted wholly or in part.): Kinder Morgan, Inc.		
a	Address of Parent Company: 1001 Louisiana Street, Suite 100, Houston, TX 77002		
5	Names of Subsidiary Companies ("Subsidiary Companies" means organizations, branches, divisions or subsidiaries, which are owned, wholly or in part, by the company to be permitted.): N/A, El Paso Natural Gas Company, L.L.C. has no subsidiaries		
6	Telephone numbers & names of the owners' agents and site contacts familiar with plant operations: Wade Janecek (303) 914-7602 and Gary Verquer (575) 544-5234		
7	Affected Programs to include Other States, local air pollution control programs (i.e. Bernalillo) and Indian tribes: Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B)? If yes, state which ones and provide the distances in kilometers: **States:** Arizona (74.78 km); **Indian Reservations:** Navajo Nation (28.61 km), Zuni (29.08 km), Ramah Navajo (29.31 km), Acoma (56.22 km), Laguna (63.81 km)		

Section 1-I – Submittal Requirements

Each 20.2.73 NMAC (**NOI**), a 20.2.70 NMAC (**Title V**), a 20.2.72 NMAC (**NSR** minor source), or 20.2.74 NMAC (**PSD**) application package shall consist of the following:

Hard Copy Submittal Requirements:

1) One hard copy **original signed and notarized application package** **printed double sided** **'head-to-toe'** **2-hole punched** as we bind the document on top, not on the side; except Section 2 (landscape tables), which should be head-to-head. Please use **numbered tab separators** in the hard copy submittal(s) as this facilitates the review process. For NOI submittals only, hard copies of UA1, Tables 2A, 2D & 2F, Section 3 and the signed Certification Page are required. Please include a copy of the check on a separate page.

2) If the application is for a minor NSR, PSD, NNSR, or Title V application, include one working hard **copy** for Department use. This copy should be printed in book form, 3-hole punched, and **must be double sided**. Note that this is in addition to the head-to-to 2-hole punched copy required in 1) above. Minor NSR Technical Permit revisions (20.2.72.219.B NMAC) only need to fill out Sections 1-A, 1-B, 3, and should fill out those portions of other Section(s) relevant to the technical permit revision. TV Minor Modifications need only fill out Sections 1-A, 1-B, 1-H, 3, and those portions of other Section(s) relevant to the minor modification. NMED may require additional portions of the application to be submitted, as needed.

3) The entire NOI or Permit application package, including the full modeling study, should be submitted electronically. Electronic files for applications for NOIs, any type of General Construction Permit (GCP), or technical revisions to NSRs must be submitted with compact disk (CD) or digital versatile disc (DVD). For these permit application submittals, **two** CD copies are required (in sleeves, not crystal cases, please), with additional CD copies as specified below. NOI applications require only a single CD submittal. Electronic files for other New Source Review (construction) permits/permit modifications or Title V permits/permit modifications can be submitted on CD/DVD or sent through AQB's secure file transfer service.

Electronic files sent by (check one):

☐ CD/DVD attached to paper application

☑ secure electronic transfer. Air Permit Contact Name Adam Erenstein, Email aerenstein@trinityconsultants.com

Phone number (505) 266-6611.

a. If the file transfer service is chosen by the applicant, after receipt of the application, the Bureau will email the applicant with instructions for submitting the electronic files through a secure file transfer service. Submission of the electronic files through the file transfer service needs to be completed within 3 business days after the invitation is received, so the applicant should ensure that the files are ready when sending the hard copy of the application. The applicant will not need a password to complete the transfer. **Do not use the file transfer service for NOIs, any type of GCP, or technical revisions to NSR permits.**

4) Optionally, the applicant may submit the files with the application on compact disk (CD) or digital versatile disc (DVD) following the instructions above and the instructions in 5 for applications subject to PSD review.

5) If **air dispersion modeling** is required by the application type, include the **NMED Modeling Waiver** and/or electronic air dispersion modeling report, input, and output files. The dispersion modeling ***summary report only*** should be submitted as hard copy(ies) unless otherwise indicated by the Bureau.

6) If the applicant submits the electronic files on CD and the application is subject to PSD review under 20.2.74 NMAC (PSD) or NNSR under 20.2.79 NMC include,
   a. one additional CD copy for US EPA,
   b. one additional CD copy for each federal land manager affected (NPS, USFS, FWS, USDI) and,
   c. one additional CD copy for each affected regulatory agency other than the Air Quality Bureau.

   If the application is submitted electronically through the secure file transfer service, these extra CDs do not need to be submitted.

Electronic Submittal Requirements [in addition to the required hard copy(ies)]:

1) All required electronic documents shall be submitted as 2 separate CDs or submitted through the AQB secure file transfer service. Submit a single PDF document of the entire application as submitted and the individual documents comprising the application.

2) The documents should also be submitted in Microsoft Office compatible file format (Word, Excel, etc.) allowing us to access the text and formulas in the documents (copy & paste). Any documents that cannot be submitted in a Microsoft Office compatible format shall be saved as a PDF file from within the electronic document that created the file. If you are unable to provide Microsoft office compatible electronic files or internally generated PDF files of files (items that were not created electronically:

i.e. brochures, maps, graphics, etc,), submit these items in hard copy format. We must be able to review the formulas and inputs that calculated the emissions.

3) It is preferred that this application form be submitted as 4 electronic files (3 MSWord docs: Universal Application section 1 [UA1], Universal Application section 3-19 [UA3], and Universal Application 4, the modeling report [UA4]) and 1 Excel file of the tables (Universal Application section 2 [UA2]). Please include as many of the 3-19 Sections as practical in a single MS Word electronic document. Create separate electronic file(s) if a single file becomes too large or if portions must be saved in a file format other than MS Word.

4) The electronic file names shall be a maximum of 25 characters long (including spaces, if any). The format of the electronic Universal Application shall be in the format: "A-3423-FacilityName". The "A" distinguishes the file as an application submittal, as opposed to other documents the Department itself puts into the database. Thus, all electronic application submittals should begin with "A-". Modifications to existing facilities should use the core permit number (i.e. '3423') the Department assigned to the facility as the next 4 digits. Use 'XXXX' for new facility applications. The format of any separate electronic submittals (additional submittals such as non-Word attachments, re-submittals, application updates) and Section document shall be in the format: "A-3423-9-description", where "9" stands for the section # (in this case Section 9-Public Notice). Please refrain, as much as possible, from submitting any scanned documents as this file format is extremely large, which uses up too much storage capacity in our database. Please take the time to fill out the header information throughout all submittals as this will identify any loose pages, including the Application Date (date submitted) & Revision number (0 for original, 1, 2, etc.; which will help keep track of subsequent partial update(s) to the original submittal. Do not use special symbols (#, @, etc.) in file names. The footer information should not be modified by the applicant.

Table of Contents

Table 2-A: Regulated Emission Sources

Unit and stack numbering must correspond throughout the application package. If applying for a NOI under 20.2.73 NMAC, equipment exemptions under 2.72.202 NMAC do not apply.

Unit Number[1]	Source Description	Make	Model #	Serial #	Manufacturer's Rated Capacity[3] (Specify Units)	Requested Permitted Capacity[3] (Specify Units)	Date of Manufacture[2] / Date of Construction/ Reconstruction[2]	Controlled by Unit # / Emissions vented to Stack #	Source Classification Code (SCC)	For Each Piece of Equipment, Check One	RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB)[4]	Replacing Unit No.
B-01	Natural Gas Fired Turbine	Solar	Taurus 60-7302	CC92910	6931 hp	5793 hp	10/1/2004 1/17/2005	N/A T-001	20200201	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
B-02	Natural Gas Fired Turbine	Solar	Taurus 60-7302	CC92911	6931 hp	5793 hp	1/1/1997 1/17/2005	N/A T-002	20200201	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
B-03	Natural Gas Fired Turbine	Solar	Taurus 60-7302	CC92912	6931 hp	5793 hp	10/1/2004 1/17/2005	N/A T-003	20200201	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
FUG	Facility-wide fugitive emissions	N/A	N/A	N/A	N/A	N/A	N/A N/A	N/A N/A	31088811	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
SSM	Startup, Shutdown, Maintenance Emissions	N/A	N/A	N/A	N/A	N/A	N/A N/A	N/A N/A	31088811	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		

[1] Unit numbers must correspond to unit numbers in the previous permit unless a complete cross reference table of all units in both permits is provided.

[2] Specify dates required to determine regulatory applicability.

[3] To properly account for power conversion efficiencies, generator set rated capacity shall be reported as the rated capacity of the engine in horsepower, not the kilowatt capacity of the generator set.

[4] "4SLB" means four stroke lean burn engine, "4SRB" means four stroke rich burn engine, "2SLB" means two stroke lean burn engine, "CI" means compression ignition, and "SI" means spark ignition

Table 2-B: Insignificant Activities[1] (20.2.70 NMAC) OR Exempted Equipment (20.2.72 NMAC)

All 20.2.70 NMAC (Title V) applications must list all Insignificant Activities in this table. All 20.2.72 NMAC applications must list Exempted Equipment in this table. If equipment listed on this table is exempt under 20.2.72.202.B.5, include emissions calculations and emissions totals for 202.B.5 "similar functions" units, operations, and activities in Section 6, Calculations. Equipment and activities exempted under 20.2.72.202 NMAC may not necessarily be Insignificant under 20.2.70 NMAC (and vice versa). Unit & stack numbering must be consistent throughout the application package. Per Exemptions Policy 02-012.00 (see http://www.env.nm.gov/aqb/permit/aqb_pol.html), 20.2.72.202.B NMAC Exemptions do not apply, but 20.2.72.202.A NMAC exemptions do apply to NOI facilities under 20.2.73 NMAC. List 20.2.72.301.D.4 NMAC Auxiliary Equipment for Streamline applications in Table 2-A. The List of Insignificant Activities (for TV) can be found online at http://www.env.nm.gov/aqb/forms/InsignificantListTitleV.pdf . TV sources may elect to enter both TV Insignificant Activities and Part 72 Exemptions on this form.

Unit Number	Source Description	Manufacturer	Model No. Serial No.	Max Capacity Capacity Units	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5) Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Manufacture /Reconstruction[2] Date of Installation /Construction[2]	For Each Piece of Equipment, Check Onc
TK-001	Lube oil day tank	N/A	N/A N/A	150 gal	20.2.72.202.B(2)	N/A N/A	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TK-002	Lube oil tank (drum)	N/A	N/A N/A	55 gal	20.2.72.202.B(2)	N/A N/A	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TK-003	Aux lube oil tank	N/A	N/A N/A	15 gal	20.2.72.202.B(2)	N/A N/A	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TK-004	Used lube oil tank	N/A	N/A N/A	1300 gal	20.2.72.202.B(2)	N/A N/A	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
AUX-B-01	Auxiliary Reciprocating IC Engine	Waukesha	H-24 GL HCR C-62002/1	586 hp hp	20.2.72.202.B.(3)	10/1/2004 1/17/2005	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
							☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced

[1] Insignificant activities exempted due to size or production rate are defined in 20.2.70.300.D.6, 20.2.70.7.Q NMAC, and the NMED/AQB List of Insignificant Activities, dated September 15, 2008. Emissions from these insignificant activities do not need to be reported, unless specifically requested.

[2] Specify date(s) required to determine regulatory applicability.

Table 2-C: Emissions Control Equipment

Unit and stack numbering must correspond throughout the application package. Only list control equipment for TAPs if the TAP's maximum uncontrolled emissions rate is over its respective threshold as listed in 20.2.72 NMAC, Subpart V, Tables A and B. In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions.

Control Equipment Unit No.	Control Equipment Description	Date Installed	Controlled Pollutant(s)	Controlling Emissions for Unit Number(s)[1]	Efficiency (% Control by Weight)	Method used to Estimate Efficiency
This table is not applicable as there is no Emissions Control Equipment at this facility.						

[1] List each control device on a separate line. For each control device, list all emission units controlled by the control device.

Table 2-D: Maximum Emissions (under normal operating conditions)

☑ **This Table was intentionally left blank because it would be identical to Table 2-E.**

Maximum Emissions are the emissions at maximum capacity and prior to (in the absence of) pollution control, emission-reducing process equipment, or any other emission reduction. Calculate the hourly emissions using the worst case hourly emissions for each pollutant. For each pollutant, calculate the annual emissions as if the facility were operating at maximum plant capacity without pollution controls for 8760 hours per year, unless otherwise approved by the Department. List Hazardous Air Pollutants (HAP) & Toxic Air Pollutants (TAPs) in Table 2-I. Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E-4).

Unit No.	NOx		CO		VOC		SOx		PM[1]		PM10[1]		PM2.5[1]		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
Totals																		

[1]**Condensable Particulate Matter:** Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but PM is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

Table 2-E: Requested Allowable Emissions

Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or $1.41E^{-4}$).

Unit No.	NOx		CO		VOC		SOx		PM[1]		PM10[1]		PM2.5[1]		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
B-01	27.07	118.57	5.75	25.19	0.25	1.08	0.75	3.30	0.31	1.38	0.31	1.38	0.31	1.38	-	-	-	-
B-02	27.07	118.57	5.75	25.19	0.25	1.08	0.75	3.30	0.31	1.38	0.31	1.38	0.31	1.38	-	-	-	-
B-03	27.07	118.57	5.75	25.19	0.25	1.08	0.75	3.30	0.31	1.38	0.31	1.38	0.31	1.38	-	-	-	-
FUG	-	-	-	-	*	1.17	-	-	-	-	-	-	-	-	-	-	-	-
Totals	81.21	355.70	17.25	75.56	0.74	4.41	2.25	9.90	0.94	4.13	0.94	4.13	0.94	4.13	-	-	-	-

[1] **Condensable Particulate Matter:** Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but it is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

* Denotes an hourly value is not appropriate for this emission type.

Table 2-F: Additional Emissions during Startup, Shutdown, and Routine Maintenance (SSM)

☐ This table is intentionally left blank since all emissions at this facility due to routine or predictable startup, shutdown, or scehduled maintenance are no higher than those listed in Table 2-E and a malfunction emission limit is not already permitted or requested. If you are required to report GHG emissions as described in Section 6a, include any GHG emissions during Startup, Shutdown, and/or Scheduled Maintenance (SSM) in Table 2-P. Provide an explanations of SSM emissions in Section 6 and 6a.

All applications for facilities that have emissions during routine our predictable startup, shutdown or scheduled maintenance (SSM)[1], including NOI applications, must include in this table the Maximum Emissions during routine or predictable startup, shutdown and scheduled maintenance (20.2.7 NMAC, 20.2.72.203.A.3 NMAC, 20.2.73.200.D.2 NMAC). In Section 6 and 6a, provide emissions calculations for all SSM emissions reported in this table. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (https://www.env.nm.gov/aqb/permit/aqb_pol.html) for more detailed instructions. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E-4).

Unit No.	NOx		CO		VOC		SOx		PM[2]		PM10[2]		PM2.5[2]		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
SSM	-	-	-	-	*	10.00	-	-	-	-	-	-	-	-	0.20	0.0039	-	-
Totals	-	-	-	-	*	10.00	-	-	-	-	-	-	-	-	0.20	0.0039	-	-

[1] **For instance**, if the short term steady-state Table 2-E emissions are 5 lb/hr and the SSM rate is 12 lb/hr, enter 7 lb/hr in this table. If the annual steady-state Table 2-E emissions are 21.9 TPY, and the number of scheduled SSM events result in annual emissions of 31.9 TPY, enter 10.0 TPY in the table below.

[2] **Condensable Particulate Matter:** Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but it is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

[3] H2S emissions were calculated for episodic SSM events. The H2S emission rate is conservatively based on 0.25 grains of H2S per 100 scf of gas due to customer obligations per gas tariffs. In reality the H2S emissions are significantly less than what is being requested based on sampling data. The proposed maximum facility-wide hourly H2S emission rate is 0.199 lb/hr. Blowdown ventings do not happen simultaneously.

NOTE: Emission estimates presented here are based on historical data and are not intended as a limit.

Table 2-G: Stack Exit and Fugitive Emission Rates for Special Stacks

☑ I have elected to leave this table blank because this facility does not have any stacks/vents that split emissions from a single source or combine emissions from more than one source listed in table 2-A. Additionally, the emission rates of all stacks match the Requested allowable emission rates stated in Table 2-E.

Use this table to list stack emissions (requested allowable) from split and combined stacks. List Toxic Air Pollutants (TAPs) and Hazardous Air Pollutants (HAPs) in Table 2-I. List all fugitives that are associated with the normal, routine, and non-emergency operation of the facility. Unit and stack numbering must correspond throughout the application package. Refer to Table 2-E for instructions on use of the "-" symbol and on significant figures.

Stack No.	Serving Unit Number(s) from Table 2-A	NOx		CO		VOC		SOx		PM		PM10		PM2.5		□ H_2S or □ Lead	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
Totals:																	

Table 2-H: Stack Exit Conditions

Unit and stack numbering must correspond throughout the application package. Include the stack exit conditions for each unit that emits from a stack, including blowdown venting parameters and tank emissions. If the facility has multiple operating scenarios, complete a separate Table 2-H for each scenario and, for each, type scenario name here:

Stack Number	Serving Unit Number(s) from Table 2-A	Orientation (H-Horizontal V=Vertical)	Rain Caps (Yes or No)	Height Above Ground (ft)	Temp. (F)	Flow Rate		Moisture by Volume (%)	Velocity (ft/sec)	Inside Diameter (ft)
						(acfs)	(dscfs)			
T-001	B-01	V	No	38	864	1775	N/A	N/A	184.5	3.50
T-002	B-02	V	No	38	864	1775	N/A	N/A	184.5	3.50
T-003	B-03	V	No	38	864	1775	N/A	N/A	184.5	3.50

Table 2-I: Stack Exit and Fugitive Emission Rates for HAPs and TAPs

In the table below, report the Potential to Emit for each HAP from each regulated emission unit listed in Table 2-A, only if the entire facility emits the HAP at a rate greater than or equal to one (1) ton per year For each such emission unit, HAPs shall be reported to the nearest 0.1 tpy. Each facility-wide Individual HAP total and the facility-wide Total HAPs shall be the sum of all HAP sources calculated to the nearest 0.1 ton per year. Per 20.2.72.403.A.1 NMAC, facilities not exempt [see 20.2.72.402.C NMAC] from TAP permitting shall report each TAP that has an uncontrolled emission rate in excess of its pounds per hour screening level specified in 20.2.72.502 NMAC. TAPs shall be reported using one more significant figure than the number of significant figures shown in the pound per hour threshold corresponding to the substance. Use the HAP nomenclature as it appears in Section 112 (b) of the 1990 CAAA and the TAP nomenclature as it listed in 20.2.72.502 NMAC. Include tank-flashing emissions estimates of HAPs in this table. For each HAP or TAP listed, fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected or the pollutant is emitted in a quantity less than the threshold amounts described above.

Stack No.	Unit No.(s)	Total HAPs		Acetaldehyde ☑HAP or ☐ TAP		Formaldehyde ☑HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP		Provide Pollutant Name Here ☐ HAP or ☐ TAP	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
T-001	B-01	0.64	2.78	0.26	1.16	0.26	1.13												
T-002	B-02	0.64	2.78	0.26	1.16	0.26	1.13												
T-003	B-03	0.64	2.78	0.26	1.16	0.26	1.13												
FUG	FUG	*	0.012	-	-	-	-												
SSM	SSM	*	0.069	-	-	-	-												
Totals:		1.91	8.42	0.79	3.48	0.78	3.40												

* Denotes an hourly value is not appropriate for this emission type.

Table 2-J: Fuel

Specify fuel characteristics and usage. Unit and stack numbering must correspond throughout the application package.

Unit No.	Fuel Type (low sulfur Diesel, ultra low sulfur diesel, Natural Gas, Coal, …)	Fuel Source: purchased commercial, pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Specify Units				
			Lower Heating Value	Hourly Usage	Annual Usage	% Sulfur	% Ash
B-01	Pipeline Quality Natural Gas	Pipeline Quality Natural Gas	904 BTU/scf	52.6 Mscf	461 MMscf	5.0 grains S/100 scf	N/A
B-02	Pipeline Quality Natural Gas	Pipeline Quality Natural Gas	904 BTU/scf	52.6 Mscf	461 MMscf	5.0 grains S/100 scf	N/A
B-03	Pipeline Quality Natural Gas	Pipeline Quality Natural Gas	904 BTU/scf	52.6 Mscf	461 MMscf	5.0 grains S/100 scf	N/A

Table 2-K: Liquid Data for Tanks Listed in Table 2-L

For each tank, list the liquid(s) to be stored in each tank. If it is expected that a tank may store a variety of hydrocarbon liquids, enter "mixed hydrocarbons" in the Composition column for that tank and enter the corresponding data of the most volatile liquid to be stored in the tank. If tank is to be used for storage of different materials, list all the materials in the "All Calculations" attachment, run the newest version of TANKS on each, and use the material with the highest emission rate to determine maximum uncontrolled and requested allowable emissions rate. The permit will specify the most volatile category of liquids that may be stored in each tank. Include appropriate tank-flashing modeling input data. Use additional sheets if necessary. Unit and stack numbering must correspond throughout the application package.

Tank No.	SCC Code	Material Name	Composition	Liquid Density (lb/gal)	Vapor Molecular Weight (lb/lb*mol)	Average Storage Conditions		Max Storage Conditions	
						Temperature (°F)	True Vapor Pressure (psia)	Temperature (°F)	True Vapor Pressure (psia)
N/A - All tanks at the facility are insignificant.									

Table 2-L: Tank Data

Include appropriate tank-flashing modeling input data. Use an addendum to this table for unlisted data categories. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary. See reference Table 2-L2. Note: 1.00 bbl = 10.159 M3 = 42.0 gal

Tank No.	Date Installed	Materials Stored	Seal Type (refer to Table 2-LR below)	Roof Type (refer to Table 2-LR below)	Capacity		Diameter (M)	Vapor Space (M)	Color (from Table VI-C)		Paint Condition (from Table VI-C)	Annual Throughput (gal/yr)	Turn-overs (per year)
					(bbl)	(M^3)			Roof	Shell			
N/A - All tanks at the facility are insignificant.													

Table 2-L2: Liquid Storage Tank Data Codes Reference Table

Roof Type	Seal Type, Welded Tank Seal Type		Seal Type, Riveted Tank Seal Type		Roof, Shell Color	Paint Condition
FX: Fixed Roof	**Mechanical Shoe Seal**	**Liquid-mounted resilient seal**	**Vapor-mounted resilient seal**	**Seal Type**	**WH**: White	Good
IF: Internal Floating Roof	**A**: Primary only	**A**: Primary only	**A**: Primary only	**A**: Mechanical shoe, primary only	**AS**: Aluminum (specular)	Poor
EF: External Floating Roof	**B**: Shoe-mounted secondary	**B**: Weather shield	**B**: Weather shield	**B**: Shoe-mounted secondary	**AD**: Aluminum (diffuse)	
P: Pressure	**C**: Rim-mounted secondary	**C**: Rim-mounted secondary	**C**: Rim-mounted secondary	**C**: Rim-mounted secondary	**LG**: Light Gray	
					MG: Medium Gray	
					BL: Black	
					OT: Other (specify)	

Note: 1.00 bbl = 0.159 M^3 = 42.0 gal

Table 2-M: Materials Processed and Produced (Use additional sheets as necessary.)

Material Processed				Material Produced			
Description	**Chemical Composition**	**Phase (Gas, Liquid, or Solid)**	**Quantity (specify units)**	**Description**	**Chemical Composition**	**Phase**	**Quantity (specify units)**
N/A - Materials are not processed or produced at this facility.							

Table 2-N: CEM Equipment

Enter Continuous Emissions Measurement (CEM) Data in this table. If CEM data will be used as part of a federally enforceable permit condition, or used to satisfy the requirements of a state or federal regulation, include a copy of the CEM's manufacturer specification sheet in the Information Used to Determine Emissions attachment. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

Stack No.	Pollutant(s)	Manufacturer	Model No.	Serial No.	Sample Frequency	Averaging Time	Range	Sensitivity	Accuracy
This table is not applicable as there are no Continuous Emissions Monitoring devices at this facility.									

Table 2-O: Parametric Emissions Measurement Equipment

Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

Unit No.	Parameter/Pollutant Measured	Location of Measurement	Unit of Measure	Acceptable Range	Frequency of Maintenance	Nature of Maintenance	Method of Recording	Averaging Time
This table is not applicable as there are no parametric emissions measurement devices at this facility.								

Table 2-P: Greenhouse Gas Emissions

Applications submitted under 20.2.70, 20.2.72, & 20.2.74 NMAC are required to complete this Table. Power plants, Title V major sources, and PSD major sources must report and calculate all GHG emissions for each unit. Applicants must report potential emission rates in short tons per year (see Section 6.a for assistance). Include GHG emissions during Startup, Shutdown, and Scheduled Maintenance in this table. For minor source facilities that are not power plants, are not Title V, or are not PSD, there are three options for reporting GHGs 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHG as a second separate unit; OR 3) check the following box ☐ By checking this box, the applicant acknowledges the total CO2e emissions are less than 75,000 tons per year.

		CO_2 ton/yr	N_2O ton/yr	CH_4 ton/yr	SF_6 ton/yr	PFC/HFC ton/yr[2]									Total GHG Mass Basis ton/yr[4]	Total CO_2e ton/yr[5]
Unit No.	**GWPs [1]**	**1**	**265**	**28**	**22,800**	**footnote 3**										
B-01	**mass GHG**	24,394.80	0.046	0.46											24,395.31	
	CO_2e	24,394.80	12.19	12.88												24,419.87
B-02	**mass GHG**	24,394.80	0.046	0.46											24,395.31	
	CO_2e	24,394.80	12.19	12.88												24,419.87
B-03	**mass GHG**	24,394.80	0.046	0.46											24,395.31	
	CO_2e	24,394.80	12.19	12.88												24,419.87
FUG	**mass GHG**	1.17	-	1.17											2.34	
	CO_2e	1.17	-	32.70												33.87
SSM	**mass GHG**	10.00	-	450.00											460.00	
	CO_2e	10.00	-	12,600.00												12,610.00
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO_2e															
	mass GHG															
	CO2e															
Total	**mass GHG**	73,195.57	0.14	452.55											73,648.25	
	CO_2e	73,195.57	36.57	12,671.34												85,903.48

[1] **GWP** (Global Warming Potential): Applicants must use the most current GWPs codified in Table A-1 of 40 CFR part 98. GWPs are subject to change, therefore, applicants need to check 40 CFR 98 to confirm GWP values.

[2] For **HFCs** or **PFCs** describe the specific HFC or PFC compound and use a separate column for each individual compound.

[3] For each new compound, enter the appropriate GWP for each HFC or PFC compound from Table A-1 in 40 CFR 98.

[4] Green house gas emissions on a **mass basis** is the ton per year green house gas emission before adjustment with its GWP.

[5] **CO_2e** means Carbon Dioxide Equivalent and is calculated by multiplying the TPY mass emissions of the green house gas by its GWP.

Section 3

Application Summary

The **Application Summary** shall include a brief description of the facility and its process, the type of permit application, the applicable regulation (i.e. 20.2.72.200.A.X, or 20.2.73 NMAC) under which the application is being submitted, and any air quality permit numbers associated with this site. If this facility is to be collocated with another facility, provide details of the other facility including permit number(s). In case of a revision or modification to a facility, provide the lowest level regulatory citation (i.e. 20.2.72.219.B.1.d NMAC) under which the revision or modification is being requested. Also describe the proposed changes from the original permit, how the proposed modification will affect the facility's operations and emissions, de-bottlenecking impacts, and changes to the facility's major/minor status (both PSD & Title V).

The **Process Summary** shall include a brief description of the facility and its processes.

Startup, Shutdown, and Maintenance (SSM) routine or predictable emissions: Provide an overview of how SSM emissions are accounted for in this application. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions.

This application is being submitted for the significant modification of NSR Permit No. 3004-M1 for the Bluewater Compressor Station (Bluewater CS) pursuant to 20.2.72.219.D.(1)(a) NMAC. The facility is owned and operated by El Paso Natural Gas Company, L.L.C. (EPNG).

Bluewater CS compresses natural gas for transportation purposes. Equipment at this facility includes three Solar natural gas combustion turbines (units B-01, B-02, and B-03) as well as one auxiliary reciprocating engine for emergency power generation (unit AUX-B-01) (exempt pursuant to 20.2.72.202.B.(3) NMAC). Additional emissions at this facility result from facility-wide fugitives (unit FUG) and startup, shutdown, and routine maintenance (unit SSM). Insignificant activities include three lube oil storage tanks (TK-001 to TK-003) and one used lube oil tank (TK-004).

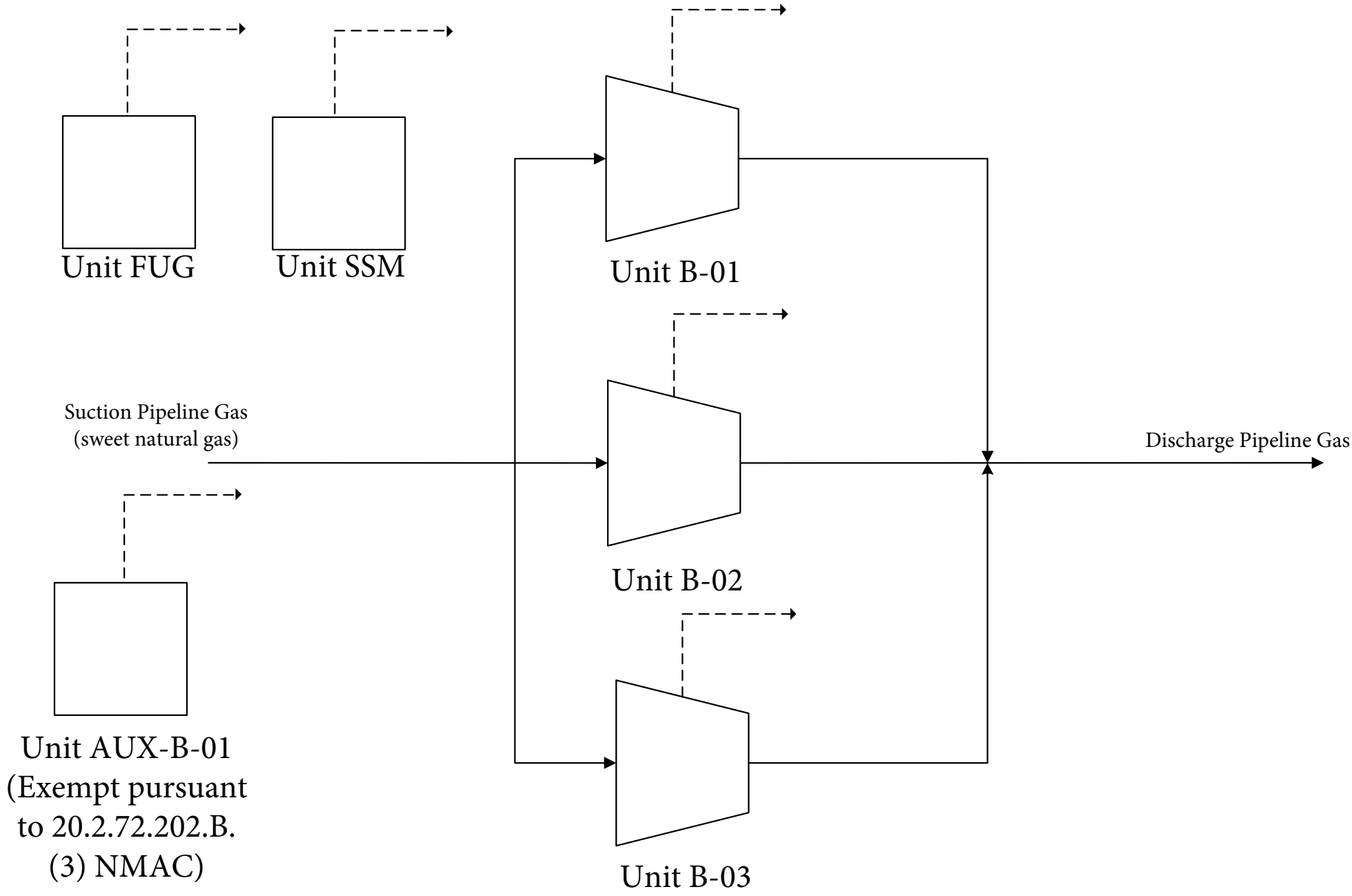
This application consists of an update to the total sulfur content of the fuel gas used at this facility (currently 2.5 gr S/100 scf) to reflect the total sulfur limit in EPNG's FERC tariff of 5 gr S/100 scf. No other changes or modifications will occur at this facility pursuant to this application.

Section 4

Process Flow Sheet

A **process flow sheet** and/or block diagram indicating the individual equipment, all emission points and types of control applied to those points. The unit numbering system should be consistent throughout this application.

A process flow diagram of this facility is included below.



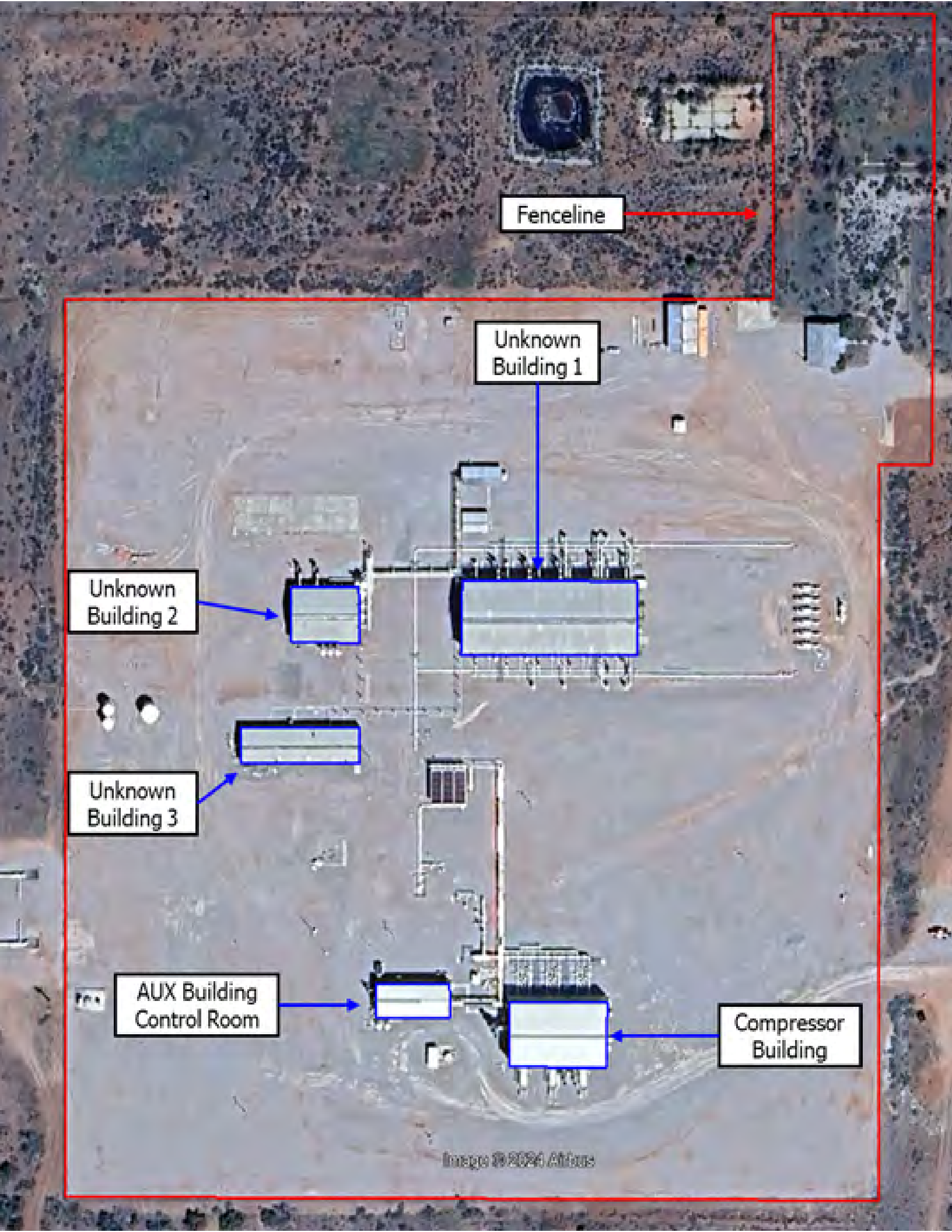
EPNG Bluewater Compressor Station Process Flow Diagram

Section 5

Plot Plan Drawn To Scale

A **plot plan drawn to scale** showing emissions points, roads, structures, tanks, and fences of property owned, leased, or under direct control of the applicant. This plot plan must clearly designate the restricted area as defined in UA1, Section 1-D.12. The unit numbering system should be consistent throughout this application.

A plot plan of this facility has been included below.


Fenceline
Unknown Building 1
Unknown Building 2
Unknown Building 3
AUX Building Control Room
Compressor Building
Image © 2024 Airbus

Section 6

All Calculations

Show all calculations used to determine both the hourly and annual controlled and uncontrolled emission rates. All calculations shall be performed keeping a minimum of three significant figures. Document the source of each emission factor used (if an emission rate is carried forward and not revised, then a statement to that effect is required). If identical units are being permitted and will be subject to the same operating conditions, submit calculations for only one unit and a note specifying what other units to which the calculations apply. All formulas and calculations used to calculate emissions must be submitted. The "Calculations" tab in the UA2 has been provided to allow calculations to be linked to the emissions tables. Add additional "Calc" tabs as needed. If the UA2 or other spread sheets are used, all calculation spread sheet(s) shall be submitted electronically in Microsoft Excel compatible format so that formulas and input values can be checked. Format all spread sheets and calculations such that the reviewer can follow the logic and verify the input values. Define all variables. If calculation spread sheets are not used, provide the original formulas with defined variables. Additionally, provide subsequent formulas showing the input values for each variable in the formula. All calculations, including those calculations are imbedded in the Calc tab of the UA2 portion of the application, the printed Calc tab(s), should be submitted under this section.

Tank Flashing Calculations: The information provided to the AQB shall include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., NOI, permit, or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis. If Hysis is used, all relevant input parameters shall be reported, including separator pressure, gas throughput, and all other relevant parameters necessary for flashing calculation.

SSM Calculations: It is the applicant's responsibility to provide an estimate of SSM emissions or to provide justification for not doing so. In this Section, provide emissions calculations for Startup, Shutdown, and Routine Maintenance (SSM) emissions listed in the Section 2 SSM and/or Section 22 GHG Tables and the rational for why the others are reported as zero (or left blank in the SSM/GHG Tables). Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on calculating SSM emissions. If SSM emissions are greater than those reported in the Section 2, Requested Allowables Table, modeling may be required to ensure compliance with the standards whether the application is NSR or Title V. Refer to the Modeling Section of this application for more guidance on modeling requirements.

Glycol Dehydrator Calculations: The information provided to the AQB shall include the manufacturer's maximum design recirculation rate for the glycol pump. If GRI-Glycalc is used, the full input summary report shall be included as well as a copy of the gas analysis that was used.

Road Calculations: Calculate fugitive particulate emissions and enter haul road fugitives in Tables 2-A, 2-D and 2-E for:

1. If you transport raw material, process material and/or product into or out of or within the facility and have PER emissions greater than 0.5 tpy.
2. If you transport raw material, process material and/or product into or out of the facility more frequently than one round trip per day.

Significant Figures:
A. All emissions standards are deemed to have at least two significant figures, but not more than three significant figures.
B. At least 5 significant figures shall be retained in all intermediate calculations.
C. In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:

(1) If the first digit to be discarded is less than the number 5, the last digit retained shall not be changed;
(2) If the first digit discarded is greater than the number 5, or if it is the number 5 followed by at least one digit other than the number zero, the last figure retained shall be increased by one unit; **and**
(3) If the first digit discarded is exactly the number 5, followed only by zeros, the last digit retained shall be rounded upward if it is an odd number, but no adjustment shall be made if it is an even number.
(4) The final result of the calculation shall be expressed in the units of the standard.

Control Devices: In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions. The applicant can indicate in this section of the

application if they chose to not take credit for the reduction in emission rates. For notices of intent submitted under 20.2.73 NMAC, only uncontrolled emission rates can be considered to determine applicability unless the state or federal Acts require the control. This information is necessary to determine if federally enforceable conditions are necessary for the control device, and/or if the control device produces its own regulated pollutants or increases emission rates of other pollutants.

Authorized emissions units at the facility are as follows:

- Three Natural Gas Turbines, providing power for compressors (Units B-01, B-02 and B-03);
- One natural gas reciprocating engine, providing standby electric power (Unit AUX-B-01) (exempt pursuant to 20.2.72.202.B.(3) NMAC);
- Facility-wide fugitive emissions (Unit FUG);
- Startup, shutdown and maintenance emissions (Unit SSM); and
- Lube oil tanks (Units TK-001, TK-002, TK-003 and TK-004) (exempt pursuant to 20.2.72.202.B.(2) NMAC)

The basis for calculating the emissions for these units is discussed here.

Turbines (B-01, B-02 and B-03)

The emission rates for NO_x, CO and VOC were calculated using testing data. The SO_2 emission rate was calculated using a maximum sulfur content in the fuel of 5.0 grains/100scf. HAP emissions were calculated using GRI-HAPCalc 3.01. As a conservative measure, the ISO horsepower was used for these calculations instead of the site-rated horsepower. PM emissions were calculated using AP-42 Table 3.1-2a emission factors.

Natural Gas Reciprocating Engine (AUX-B-01) (exempt pursuant to 20.2.72.202.B.(3) NMAC)

The emission rates for NO_x, CO, and VOC were calculated using manufacturer data. The SO_2 emission rate was calculated using a maximum sulfur content in the fuel of 5.0 grains/100scf. PM emissions were calculated using AP-42 Table 3.2-2 emission factors.

Fugitives (FUG)

The fugitive VOC and HAP emissions for the facility were calculated GRI-HAPCalc.

Startup, Shutdown and Maintenance (SSM)

VOC and H_2S emissions from startup, shutdown, and maintenance were calculated using the predicted number of SSM events, the volume of gas blown down per event, and a nominal gas constituent weight percentages. HAP emissions were calculated using the same HAP/VOC ratio from the fugitive emission calculations.

Section 6.a

Green House Gas Emissions

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

Title V (20.2.70 NMAC), Minor NSR (20.2.72 NMAC), and PSD (20.2.74 NMAC) applicants must estimate and report greenhouse gas (GHG) emissions to verify the emission rates reported in the public notice, determine applicability to 40 CFR 60 Subparts, and to evaluate Prevention of Significant Deterioration (PSD) applicability. GHG emissions that are subject to air permit regulations consist of the sum of an aggregate group of these six greenhouse gases: carbon dioxide (CO_2), nitrous oxide (N_2O), methane (CH_4), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6).

Calculating GHG Emissions:

1. Calculate the ton per year (tpy) GHG mass emissions and GHG CO_2e emissions from your facility.
2. GHG mass emissions are the sum of the total annual tons of greenhouse gases without adjusting with the global warming potentials (GWPs). GHG CO_2e emissions are the sum of the mass emissions of each individual GHG multiplied by its GWP found in Table A-1 in 40 CFR 98 Mandatory Greenhouse Gas Reporting.
3. Emissions from routine or predictable start up, shut down, and maintenance must be included.
4. Report GHG mass and GHG CO_2e emissions in Table 2-P of this application. Emissions are reported in **short** tons per year and represent each emission unit's Potential to Emit (PTE).
5. All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO2e emissions for each unit in Table 2-P.
6. For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following ☐ By checking this box, the applicant acknowledges the total CO2e emissions are less than 75,000 tons per year.

Sources for Calculating GHG Emissions:

- Manufacturer's Data
- AP-42 Compilation of Air Pollutant Emission Factors at http://www.epa.gov/ttn/chief/ap42/index.html
- EPA's Internet emission factor database WebFIRE at http://cfpub.epa.gov/webfire/
- 40 CFR 98 Mandatory Green House Gas Reporting except that tons should be reported in short tons rather than in metric tons for the purpose of PSD applicability.
- API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry. August 2009 or most recent version.
- Sources listed on EPA's NSR Resources for Estimating GHG Emissions at http://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases:

Global Warming Potentials (GWP):
Applicants must use the Global Warming Potentials codified in Table A-1 of the most recent version of 40 CFR 98 Mandatory Greenhouse Gas Reporting. The GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to that of one unit mass of CO_2 over a specified time period.

"Greenhouse gas" for the purpose of air permit regulations is defined as the aggregate group of the following six gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. **(20.2.70.7 NMAC, 20.2.74.7 NMAC).** You may also find GHGs defined in 40 CFR 86.1818-12(a).

Metric to Short Ton Conversion:
Short tons for GHGs and other regulated pollutants are the standard unit of measure for PSD and title V permitting programs. 40 CFR 98 Mandatory Greenhouse Reporting requires metric tons.
1 metric ton = 1.10231 short tons (per Table A-2 to Subpart A of Part 98 – Units of Measure Conversions)

Greenhouse Gas calculations are included in Table 2-P of the UA2

Emission Summary

Emission Summary

Unit	NO_x		CO		VOC		SO_2		PM		H_2S		Total HAP		Acetaldehyde		Formaldehyde		CO_2e
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	tpy
B-01	27.07	118.57	5.75	25.19	0.25	1.08	0.75	3.30	0.31	1.38	-	-	0.64	2.78	0.26	1.16	0.26	1.13	24,418.73
B-02	27.07	118.57	5.75	25.19	0.25	1.08	0.75	3.30	0.31	1.38	-	-	0.64	2.78	0.26	1.16	0.26	1.13	24,418.73
B-03	27.07	118.57	5.75	25.19	0.25	1.08	0.75	3.30	0.31	1.38	-	-	0.64	2.78	0.26	1.16	0.26	1.13	24,418.73
FUG	-	-	-	-	*	1.17	-	-	-	-	-	-	*	0.012	-	-	-	-	33.87
SSM	-	-	-	-	*	10.00	-	-	-	-	0.40	7.75E-03	*	0.069	-	-	-	-	12,610.00
Totals	81.21	355.70	17.25	75.56	0.74	14.41	2.26	9.89	0.94	4.13	0.40	7.75E-03	1.91	8.42	0.79	3.48	0.78	3.40	85,900.05

Notes

"*" Denotes an hourly value is not appropriate for this emission type.

"-" Denotes emissions of this pollutant are not expected.

Turbine Emissions

Unit: B-01, B-02 and B-03. Note: These same sources were identified in the NSR Permit 3004-R2 as: T-001, T-002 and T-003.
Description: Solar Natural Gas Combustion Turbines, Model 60-7302

ISO Rating:	6931	hp	For informational purposes only; emissions are calculated using the site rating
Site Rating:	5793	hp	Based on manufacturer's data
Fuel Heating Value:	904	Btu/scf	
Fuel Consumption:	461	MMscf/yr	
Heat Input:	47.61	MMBtu/hr	Heat input (Btu/hp-hr) * Site rating (hp) * 1MMBtu/10^6Btu
Heat Input:	8219.0	Btu/hp-hr	Manufacturer data

Emission Calculations

NO_x	CO	VOC[1]	SO_2[2]	PM[3]	Acetaldehyde[4]	Formaldehyde[4]	Total HAPs[4]	
27.07	5.75	0.25						lb/hr
			5.0					grains S/100 scf
27.07	**5.75**	**0.25**	**0.75**	**0.31**	**0.26**	**0.26**	**0.64**	**lb/hr**
118.6	**25.19**	**1.08**	**3.30**	**1.38**	**1.16**	**1.13**	**2.78**	**tons/yr**

[1] VOCs assumed 15% of UHC.

[2] SO_2 emission rate based on sulfur content of 5.0gr S/100scf

[3] PM=PM10=PM2.5; AP-42 Table 3.1-2a

[4] HAP tpy emission rate from GRI-HAPCalc 3.01.

Unit: F-001
Description: Facility-wide fugitives

VOC	Benzene	Toluene	Ethylbenzene	Xylenes	Total HAPs		
0.56	4.90E-03	8.20E-03	4.00E-04	2.10E-03	1.56E-02	**tpy**	GRI-HAPCalc
100%	100%	100%	100%	100%	100%	%	Safety Factor
0.25	2.24E-03	3.74E-03	1.83E-04	9.59E-04	7.12E-03	**lb/hr**[1]	
1.11	**9.80E-03**	**1.64E-02**	**8.00E-04**	**4.20E-03**	**3.12E-02**	**tpy**	

[1] Hourly emission rates are shown for informational purposes only. Hourly emission rates are not appropriate for this emission type.

Representative Facility Gas Breakdown:

Component	Weight %
Methane:	85%
CO_2:	2%
VOC:	3.5%

GHG Emissions

CH_4	CO_2	CO_2e		
27.01	0.64		tons/yr[2]	
28.00	1.00		GWP	40 CFR 98 Table A-1
756.30	0.64	756.93	tons/yr CO_2e	

[2] tons/yr = VOC emissions (tons/yr) / VOC Weight% * Component Weight%

Fugitive Emissions

Unit: FUG
Description: Facility-Wide Fugitive Emissions

VOCs	Benzene	Toluene	Ethylbenzene	Xylene	Total HAPs	
0.56	3.70E-03	6.20E-03	3.00E-04	1.60E-03	0.012	tons/yr, GRI-HAPCalc 3.01
110%	0%	0%	0%	0%	0%	Safety Factor
1.17	**3.70E-03**	**6.20E-03**	**3.00E-04**	**1.60E-03**	**0.012**	**tons/yr (w/SF)**

SSM Emissions

Unit: SSM
Description: Facility-wide SSM emissions

Gas Analysis (Typical)

VOC weight %:	2.00%		Nominal
CO2 weight %:	2.00%		Nominal
CH4 weight %:	90.00%		Nominal
Gas molecular weight:	17.00	lb/lb-mol	Nominal
Gas molar volume:	378.61	scf/lb-mol	Constant
Gas density:	0.0449	lb/scf	Gas MW / Molar volume

Turbine Blowdown Venting (BD-Unit)

SSM Emission Rates, Per Event

Event Description:	Planned Maintenance and Normal Shutdown		
Volume per event:	26	Mscf/event	Estimated (varies)
VOC Emissions:	23.3	lb/event	lb/scf * scf/event * VOC wt %

SSM Emission Rates, Annual

Annual volume:	10312.64	Mscf/yr	Expected blowdown volume
VOC Emissions:	4.6	tons/yr	lb/scf * scf/event * VOC wt % * ton/2000 lb

Turbine Starting Gas (BD-Unit)

SSM Emission Rates, Per Event

Event Description:	Normal Startup		
Volume per event:	150	Mscf/event	Estimated (varies)
VOC Emissions:	135	lb/event	lb/scf * scf/event * VOC wt %

SSM Emission Rates, Annual

Annual volume:	10819.5	Mscf/yr	Expected blowdown volume
VOC Emissions:	4.9	tons/yr	lb/scf * scf/event * VOC wt %

Facility Blowdown Venting (BD-ESD)

SSM Emission Rates, Per Event

Event Description:	Station ESD		
Volume per event:	558	Mscf/event	Estimated (varies)
VOC Emissions:	501	lb/event	lb/scf * scf/event * VOC wt %

SSM Emission Rates, Annual

Annual volume:	558	Mscf/yr	Assumes 1 event per year
VOC Emissions:	0.251	tons/yr	lb/event * event/year * ton/2000lb

Facility VOC Total: 9.739 tpy

Facility Blowdown Total

VOC Emissions:	10.0	tons/yr	
HAP emissions:	0.069	tons/yr	Assumes same HAP/VOC ratio as fugitives
CO2 Emissions:	10.0	tons/yr	VOC Emissions / %VOC * %CO2
CH4 Emissions:	450.0	tons/yr	VOC Emissions / %VOC * %CH4
CO2e Emissions:	12610.0	tons/yr	

Facility-Wide SSM Total

VOC	HAP	CO2	CH4	CO2e	
10.00	0.07	10.00	450.00	12,610.00	tons/yr

SSM Emissions

Unit: SSM
Description: Facility-wide startup, shutdown, maintenance and malfunction emissions

Gas Analysis (Typical)

H_2S	0.50 / 100	gr H_2S / scf	Nominal (Max amount allowed in pipeline quality natural gas)

Turbine Blowdown Venting (BD-Unit)

SSM Emission Rates, Per Event

Event Description:	Planned Maintenance and Normal Shutdown		
Volume per event:	26	Mscf/event	Estimated (varies)
H_2S Emissions:	0.019	lb/event	gr/scf * scf/event * 1lb/7000gr

SSM Emission Rates, Annual

Annual volume:	10312.64	Mscf/yr	Expected blowdown volume
H_2S Emissions:	0.0037	tons/yr	gr/scf * scf/event * 1lb/7000gr * ton/2000 lb

Turbine Starting Gas (BD-Unit)

SSM Emission Rates, Per Event

Event Description:	Normal Startup		
Volume per event:	150	Mscf/event	Estimated (varies)
H_2S Emissions:	0.107	lb/event	gr/scf * scf/event * 1lb/7000gr

SSM Emission Rates, Annual

Annual volume:	10819.5	Mscf/yr	Expected blowdown volume
H_2S Emissions:	0.0039	tons/yr	gr/scf * scf/event * 1lb/7000gr * ton/2000 lb

Facility Blowdown Venting (BD-ESD)

SSM Emission Rates, Per Event

Event Description:	Station ESD		
Volume per event:	558	Mscf/event	Estimated (varies)
H_2S Emissions:	0.399	lb/event	gr/scf * scf/event * 1lb/7000gr

SSM Emission Rates, Annual

Annual volume:	558	Mscf/yr	Expected blowdown volume
H_2S Emissions:	1.99E-04	tons/yr	gr/scf * scf/event * 1lb/7000gr * ton/2000 lb

Facility H_2S Total:	0.0077	tons/yr

Facility Blowdown Total

H_2S Emissions:	0.0077	tons/yr

Facility-Wide SSM Total

H_2S	
7.75E-03	tons/yr

Section 7

Information Used To Determine Emissions

Information Used to Determine Emissions shall include the following:

- ☑ If manufacturer data are used, include specifications for emissions units and control equipment, including control efficiencies specifications and sufficient engineering data for verification of control equipment operation, including design drawings, test reports, and design parameters that affect normal operation.
- ☑ If test data are used, include a copy of the complete test report. If the test data are for an emissions unit other than the one being permitted, the emission units must be identical. Test data may not be used if any difference in operating conditions of the unit being permitted and the unit represented in the test report significantly effect emission rates.
- ☑ If the most current copy of AP-42 is used, reference the section and date located at the bottom of the page. Include a copy of the page containing the emissions factors, and clearly mark the factors used in the calculations.
- ☐ If an older version of AP-42 is used, include a complete copy of the section.
- ☐ If an EPA document or other material is referenced, include a complete copy.
- ☐ Fuel specifications sheet.
- ☐ If computer models are used to estimate emissions, include an input summary (if available) and a detailed report, and a disk containing the input file(s) used to run the model. For tank-flashing emissions, include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., permit or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis.

The following items were used to calculate the emissions for this application:

- Turbines (B-01, B-02 and B-03)
  - GRI-HAPCalc 3.01 Output
  - Manufacturer Data
  - AP-42 Table 3.1-2a
- Facility-wide fugitive emissions (FUG)
  - GRI-HAPCalc 3.01 Output

SOLAR TURBINES INCORPORATED
ENGINE PERFORMANCE CODE REV. 3.25
CUSTOMER: EPNG Bluewater
JOB ID: OD3-434

DATE RUN: 9-Jan-04
RUN BY: William L Richards

NEW EQUIPMENT PREDICTED EMISSION PERFORMANCE
DATA FOR POINT NUMBER 1

Fuel: CHOICE NATURAL GAS
Water Injection: NO
Number of Engines Tested: 0
Model: TAURUS 60-7300 CS/MD 59F MATCH GAS
Emissions Data: REV. 0.0

Customer: EPNG Bluewater
Inquiry Number:

The following predicted emissions performance is based on the following specific single point: (see attached)

Hp= 5793, %Full Load= 100.0, Elev= 7150 ft, %RH= 60.0, Temperature= 0 F

NOX NOM	NOX MAX	CO NOM	CO MAX	UHC NOM	UHC MAX	
*	143.00	*	50.00	*	25.00	PPMvd at 15% O2
*	118.60	*	25.25	*	7.23	ton/yr
*	0.573	*	0.122	*	0.035	lbm/MMBtu (Fuel LHV)
*	6.27	*	1.33	*	0.38	lbm/(MW-hr) (gas turbine shaft pwr)
*	27.08	*	5.76	*	1.65	lbm/hr

* NOMINAL EMISSIONS DATA UNAVAILABLE FOR THIS ENGINE

IMPORTANT NOTES

1. For short-term emission limits such as lbs/hr., Solar recommends using "worst case" anticipated operating conditions specific to the application and the site conditions. Worst case for one pollutant is not necessarily the same for another. The emission values on this form are only predicted emissions at the specific operating conditions listed.
2. Solar's typical SoLoNOx warranty is for greater than 0 deg F, and between 50% and 100% load for gas fuel, and between 80% and 100% load for liquid fuel. An emission warranty for non-SoLoNOx equipment is for greater than 0 deg F and between 80% and 100% load.
3. Fuel must meet Solar standard fuel specification ES 9-98. Predicted emissions are based on the attached fuel composition, or, San Diego natural gas or equivalent.
4. If needed, Solar can provide generic documents to address turbine operation outside typical warranty ranges, as well as non-warranted emissions of SO2, PM10/2.5, VOC, and formaldehyde.
5. Solar can optionally provide factory testing in San Diego to ensure the actual unit(s) meet the above values within the tolerances quoted. Pricing and schedule impact will be provided upon request.

Table 3.1-2a. EMISSION FACTORS FOR CRITERIA POLLUTANTS AND GREENHOUSE GASES FROM STATIONARY GAS TURBINES

Emission Factors[a] - Uncontrolled				
Pollutant	Natural Gas-Fired Turbines[b]		Distillate Oil-Fired Turbines[d]	
	(lb/MMBtu)[c] (Fuel Input)	Emission Factor Rating	(lb/MMBtu)[e] (Fuel Input)	Emission Factor Rating
CO_2[f]	110	A	157	A
N_2O	0.003[g]	E	ND	NA
Lead	ND	NA	1.4 E-05	C
SO_2	0.94S[h]	B	1.01S[h]	B
Methane	8.6 E-03	C	ND	NA
VOC	2.1 E-03	D	4.1 E-04[j]	E
TOC[k]	1.1 E-02	B	4.0 E-03[l]	C
PM (condensible)	4.7 E-03[l]	C	7.2 E-03[l]	C
PM (filterable)	1.9 E-03[l]	C	4.3 E-03[l]	C
PM (total)	6.6 E-03[l]	C	1.2 E-02[l]	C

[a] Factors are derived from units operating at high loads (≥80 percent load) only. For information on units operating at other loads, consult the background report for this chapter (Reference 16), available at "www.epa.gov/ttn/chief". ND = No Data, NA = Not Applicable.

[b] SCCs for natural gas-fired turbines include 2-01-002-01, 2-02-002-01 & 03, and 2-03-002-02 & 03.

[c] Emission factors based on an average natural gas heating value (HHV) of 1020 Btu/scf at 60°F. To convert from (lb/MMBtu) to ($lb/10^6$ scf), multiply by 1020. Similarly, these emission factors can be converted to other natural gas heating values.

[d] SCCs for distillate oil-fired turbines are 2-01-001-01, 2-02-001-01, 2-02-001-03, and 2-03-001-02.

[e] Emission factors based on an average distillate oil heating value of 139 MMBtu/10^3 gallons. To convert from (lb/MMBtu) to ($lb/10^3$ gallons), multiply by 139.

[f] Based on 99.5% conversion of fuel carbon to CO_2 for natural gas and 99% conversion of fuel carbon to CO_2 for distillate oil. CO_2 (Natural Gas) [lb/MMBtu] = (0.0036 scf/Btu)(%CON)(C)(D), where %CON = weight percent conversion of fuel carbon to CO_2, C = carbon content of fuel by weight, and D = density of fuel. For natural gas, C is assumed at 75%, and D is assumed at 4.1 E+04 $lb/10^6$scf. For distillate oil, CO_2 (Distillate Oil) [lb/MMBtu] = (26.4 gal/MMBtu) (%CON)(C)(D), where C is assumed at 87%, and the D is assumed at 6.9 lb/gallon.

[g] Emission factor is carried over from the previous revision to AP-42 (Supplement B, October 1996) and is based on limited source tests on a single turbine with water-steam injection (Reference 5).

[h] All sulfur in the fuel is assumed to be converted to SO_2. S = percent sulfur in fuel. Example, if sulfur content in the fuel is 3.4 percent, then S = 3.4. If S is not available, use 3.4 E-03 lb/MMBtu for natural gas turbines, and 3.3 E-02 lb/MMBtu for distillate oil turbines (the equations are more accurate).

[j] VOC emissions are assumed equal to the sum of organic emissions.

[k] Pollutant referenced as THC in the gathered emission tests. It is assumed as TOC, because it is based on EPA Test Method 25A.

[l] Emission factors are based on combustion turbines using water-steam injection.

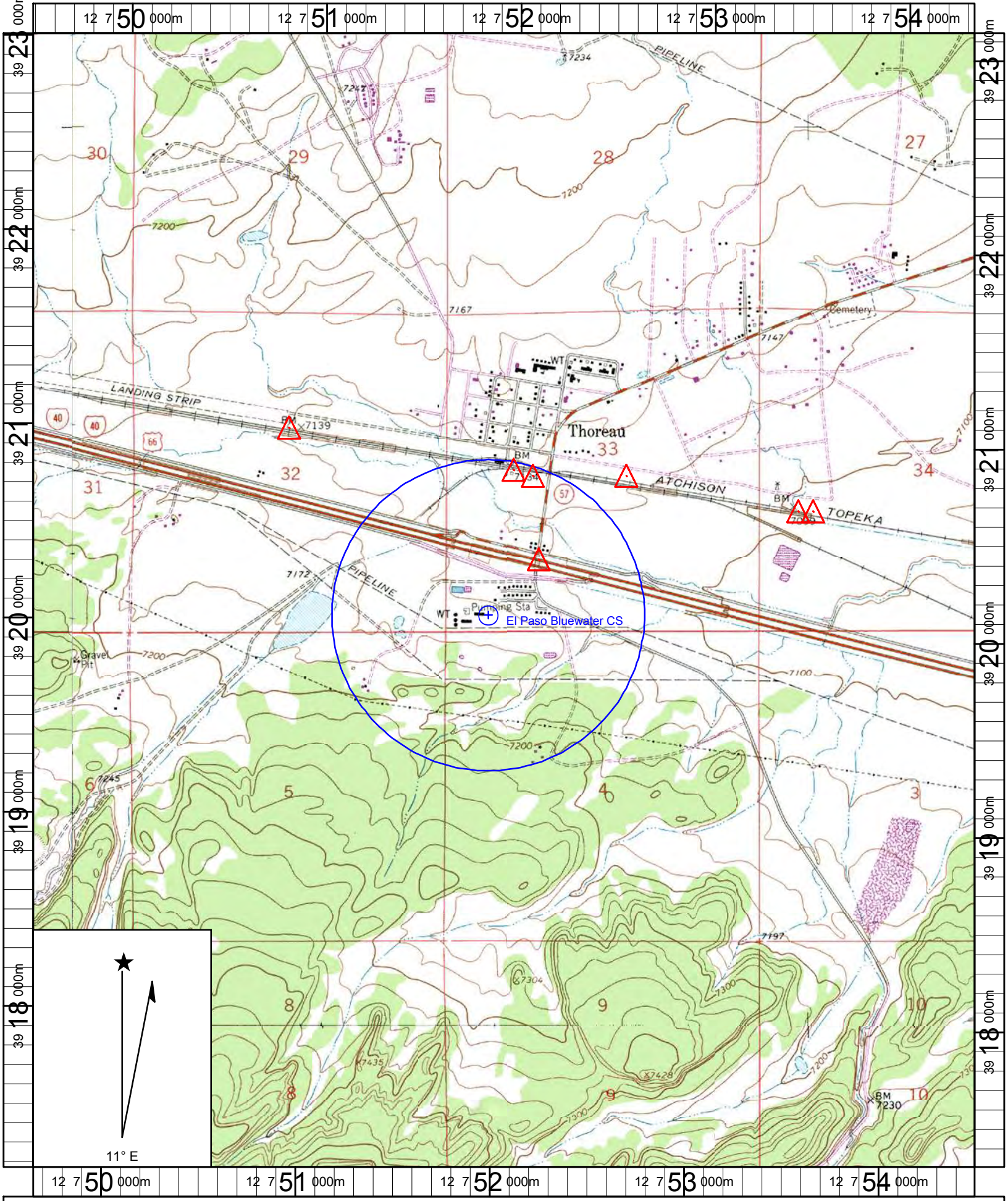
Section 8

Map(s)

A map such as a 7.5 minute topographic quadrangle showing the exact location of the source. The map shall also include the following:

The UTM or Longitudinal coordinate system on both axes	An indicator showing which direction is north
A minimum radius around the plant of 0.8km (0.5 miles)	Access and haul roads
Topographic features of the area	Facility property boundaries
The name of the map	The area which will be restricted to public access
A graphical scale	

A topographic map is included below.



Name: THOREAU
Date: 2/11/2009
Scale: 1 inch equals 2000 feet

Location: 12 0751990 E 3920158 N
Caption: El Paso Natural Gas
Bluewater Compressor Station

Section 9

Proof of Public Notice

(for NSR applications submitting under 20.2.72 or 20.2.74 NMAC)
(This proof is required by: 20.2.72.203.A.14 NMAC "Documentary Proof of applicant's public notice")

☑ **I have read the AQB "Guidelines for Public Notification for Air Quality Permit Applications"**
This document provides detailed instructions about public notice requirements for various permitting actions. It also provides public notice examples and certification forms. Material mistakes in the public notice will require a re-notice before issuance of the permit.

Unless otherwise allowed elsewhere in this document, the following items document proof of the applicant's Public Notification. Please include this page in your proof of public notice submittal with checkmarks indicating which documents are being submitted with the application.

New Permit and **Significant Permit Revision** public notices must include all items in this list.

Technical Revision public notices require only items 1, 5, 9, and 10.

Per the Guidelines for Public Notification document mentioned above, include:

1. ☑ A copy of the certified letter receipts with post marks (20.2.72.203.B NMAC)
2. ☑ A list of the places where the public notice has been posted in at least four publicly accessible and conspicuous places, including the proposed or existing facility entrance. (e.g: post office, library, grocery, etc.)
3. ☑ A copy of the property tax record (20.2.72.203.B NMAC).
4. ☑ A sample of the letters sent to the owners of record.
5. ☑ A sample of the letters sent to counties, municipalities, and Indian tribes.
6. ☑ A sample of the public notice posted and a verification of the local postings.
7. ☑ A table of the noticed citizens, counties, municipalities and tribes and to whom the notices were sent in each group.
8. ☑ A copy of the public service announcement (PSA) sent to a local radio station and documentary proof of submittal.
9. ☑ A copy of the classified or legal ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
10. ☑ A copy of the display ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
11. ☑ A map with a graphic scale showing the facility boundary and the surrounding area in which owners of record were notified by mail. This is necessary for verification that the correct facility boundary was used in determining distance for notifying land owners of record.

Outlook

Bluewater Compressor Station Public Service Announcement

From Ryan Ahlberg <Ryan.Ahlberg@trinityconsultants.com>
Date Wed 3/19/2025 1:40 PM
To psanews@kglp.org <psanews@kglp.org>

Dear Radio 91.7 KGLP FM,

Per New Mexico Administrative Code 20.2.72.203.B NMAC and according to the Guidance for Public Notice for Air Quality Permit Applications – **(5) Notifications: Submittal of Public Service Announcement (PSA):** A public service announcement required for permits and significant permit revisions must be submitted to at least one radio or television station, which services the municipality, or county which the facility is or will be located. **Therefore, based on the above, we respectfully ask you to air the information shown below as a Public Service Announcement.**

The public service announcement request must contain the following information about the facility or proposed facility (20.2.72.203.D NMAC).

a. The name: **Bluewater Compressor Station,** location: **35°23'37.7" N, 108°13'40.6" W**. and type of business: **Compressor Station.**
b. The name and principal owner or operator: **El Paso Natural Gas Company, L.L.C.** – owner and operator.
c. The type of process or change for which the permit is sought: **NSR Significant Revision – update to the total sulfur content of the fuel gas used at this facility (currently 2.5 gr S/100 scf) to reflect the total sulfur limit in EPNG's FERC tariff of 5 gr S/100 scf.**
d. Locations where the notices have been posted in Loving, NM 88256: **(1) Bluewater Compressor Station Facility Entrance, (2) Speedway, Hwy 371 Mm, #1, Throeau, NM 87323, (3) D & J Laundromat, 100 NM-371, Thoreau, NM 87323, and (4) Thoreau United States Postal Service, 3 Prewitt St, Thoreau, NM 87323.**
e. The Department's address or telephone number to which comments may be directed: **Permit Programs manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1, Santa Fe, New Mexico; 87505-1816; (505) 476-4300; 1 (800) 224-7009.**

Ryan Ahlberg
Associate Consultant

P 505.266.6611 M 815.341.2524
Email: mailto:ryan.ahlberg@trinityconsultants.com
9400 Holly Ave NE, Bldg 3, Ste B Albuquerque, NM 87122

Trinity Consultants

Connect with us: LinkedIn / YouTube / trinityconsultants.com (UPDATED WEBSITE!)


NOTICE
MISSING
CASH REWARD OFFERED
"NM 612 Lake Property"
4 sale 0.689 acres 2
Story Cabin elec/septic.
AS-IS sale Taxes paid up
No liens Partial Trade
w/cash Conns. dered
OUT OF ORDER


NO
TRESPASSING
VIOLATORS
WILL BE
PROSECUTED
24 HOURS
A DAY


El Paso
Natural Gas
a Kinder Morgan
NOTICE


U.S. POSTAL INSPECTORS
REWARD
NOTICE
PLEASE USE FOR P.O. BOX MAIL NOT BELONGING IN YOUR BOX.
MAIL PLACED HERE WILL BE VERIFIED DAILY.
THANK YOU FOR YOUR COOPERATION.
POSTMASTER
Mail Placed in wrong P.O. Box
Former Box-holder or Unknown


BINGO
Becenti Chapter
SUNDAY, FEBRUARY 16TH
2:00PM
Win-Pic-Ur-Prize!
You Can Save Lives!
GOSPEL JUBILEE
May this Valentine's Day Be Filled With the Greatest Love Of All.....Jesus
Grocery Bingo
Feb. 22, 2025
Thoreau Chapter
@2pm
NOTICE
WILL PAY YOU SAUL!
VETERAN LOOKING TO LEASE A SPACE TO PARK/STAY IN MY CAMPER TRAILER
Unexpected expenses?

General Posting of Notices – Certification

I, Cory L. Polen, the undersigned, certify that on **{2/19/2025},** posted a true and correct copy of the attached Public Notice in the following publicly accessible and conspicuous places in the **{Thoreau}** of **{McKinley}** County, State of New Mexico on the following dates:

1. Facility entrance {2/19/2025}
2. {Post Office}{2/19/2025}
3. {Speedway}{2/19/2025}
4. {Laundry Mat}{2/19/2025}

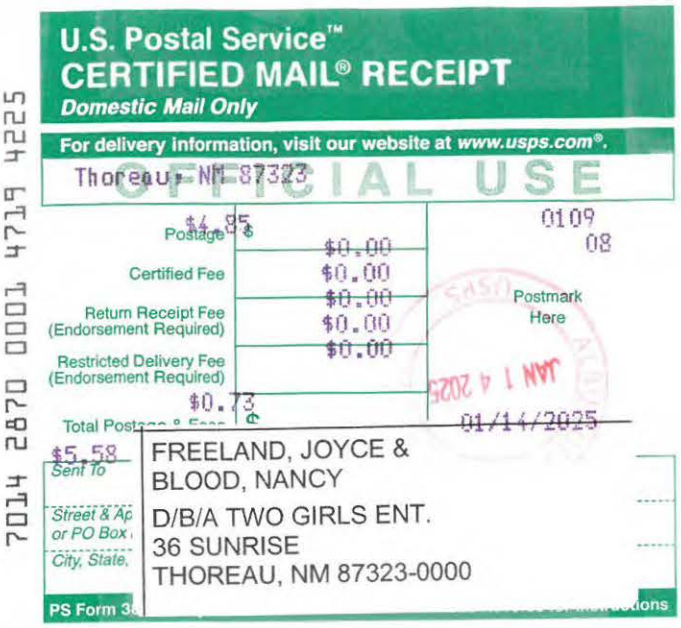
Signed this 19th day of February, 2025.

Signature

2-19-25
Date

Cory L. Polen
Printed Name

Ops. Spec.
Title {APPLICANT OR RELATIONSHIP TO APPLICANT



U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Thoreau, NM 87323
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
Total Postage & Fees $0.73
0109 08
Postmark Here
JAN 14 2025
01/14/2025
$5.58
Sent To
Street & Apt. No. or PO Box No.
City, State, ZIP+
FREELAND, JOYCE & BLOOD, NANCY
D/B/A TWO GIRLS ENT.
36 SUNRISE
THOREAU, NM 87323-0000
PS Form 3800
7014 2870 0001 4719 4225

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
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For delivery information, visit our website at www.usps.com®.
Window Rock, AZ 86515
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
Total Postage & Fees $0.73
0109 08
Postmark Here
JAN 14 2025
01/14/2025
$5.58
Sent To
Street & Apt. No. or PO Box No.
City, State, ZIP+
NAVAJO NATION OIL & GAS CO.
P.O. BOX 4439
WINDOW ROCK, AZ 86515-4439
PS Form 3800, July 2014
See Reverse for Instructions
7014 2870 0001 4719 4201

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
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For delivery information, visit our website at www.usps.com®.
Fontana, CA 92336
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
Total Postage & Fees $0.73
0109 08
Postmark Here
JAN 14 2025
01/14/2025
$5.58
Sent To
Street & Apt. No. or PO Box No.
City, State, ZIP+
SRPH INVESTMENTS, LLC.
15807 SNOWY PEAK LANE
FONTANA, CA 92336-0000
PS Form 3800
7014 2870 0001 4719 4119

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Gamerco, NM 87317
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
Total Postage & Fees $0.73
0109 08
Postmark Here
JAN 14 2025
01/14/2025
$5.58
Sent To
Street & Apt. No. or PO Box No.
City, State, ZIP+
BECENTI, THOMPSON L. & VANGIE K.
P.O. BOX 475
GAMERCO, NM 87317-0000
PS Form 3800
7014 2870 0001 4719 4188

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Amarillo, TX 79108
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
Total Postage & Fees $0.73
0109 08
Postmark Here
JAN 14 2025
01/14/2025
$5.58
Sent To
Street & Apt. No. or PO Box No.
City, State, ZIP+
RADOSEVICH, JOHN J. JR.
2605 COPPER DR.
AMARILLO, TX 79108-0000
PS Form 3800
7014 2870 0001 4718 7500

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Gallup, NM 87301
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
Total Postage & Fees $0.73
0109 08
Postmark Here
JAN 14 2025
01/14/2025
$5.58
Sent To
Street & Apt. No. or PO Box No.
City, State, ZIP+
A & D REAL ESTATE LLC.
2411 EAST AZTEC
GALLUP, NM 87301-0000
PS Form 3800,
7014 2870 0001 4718 7470

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Bloomfield, NM 87413

OFFICIAL USE

Postage	$4.85
Certified Fee	$0.00
Return Receipt Fee (Endorsement Required)	$0.00
Restricted Delivery Fee (Endorsement Required)	$0.00
	$0.00
Total Postage	$0.73
	$5.58

Postmark Here
JAN 14 2025
01/14/2025
0109
08

Sent To
MURPHY, TOM & PEGGIE

Street & Apt. No. or PO Box No.
17 ROAD 4954

City, State, ZIP+4
BLOOMFIELD, NM 87413-0000

PS Form 3800, July 2014 See Reverse for Instructions

7014 2870 0001 4719 4171

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For delivery information, visit our website at www.usps.com®.

Gallup, NM 87301

OFFICIAL USE

Postage	$4.85
Certified Fee	$0.00
Return Receipt Fee (Endorsement Required)	$0.00
Restricted Delivery Fee (Endorsement Required)	$0.00
	$0.00
Total Postage	$0.73
	$5.58

Postmark Here
JAN 14 2025
01/14/2025
0109
08

Sent To
RICO MOTOR CO.

Street & Apt. No. or PO Box No.
220 SOUTH FIFTH STREET

City, State, ZIP+4
GALLUP, NM 87301-0000

PS Form 3800, July 2014 See Reverse for Instructions

7014 2870 0001 4718 7463

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Sioux City, IA 51102

OFFICIAL USE

Postage	$4.85
Certified Fee	$0.00
Return Receipt Fee (Endorsement Required)	$0.00
Restricted Delivery Fee (Endorsement Required)	$0.00
	$0.00
Total Postage & Fees	$0.73
	$5.58

Postmark Here
JAN 14 2025
01/14/2025
0109
08

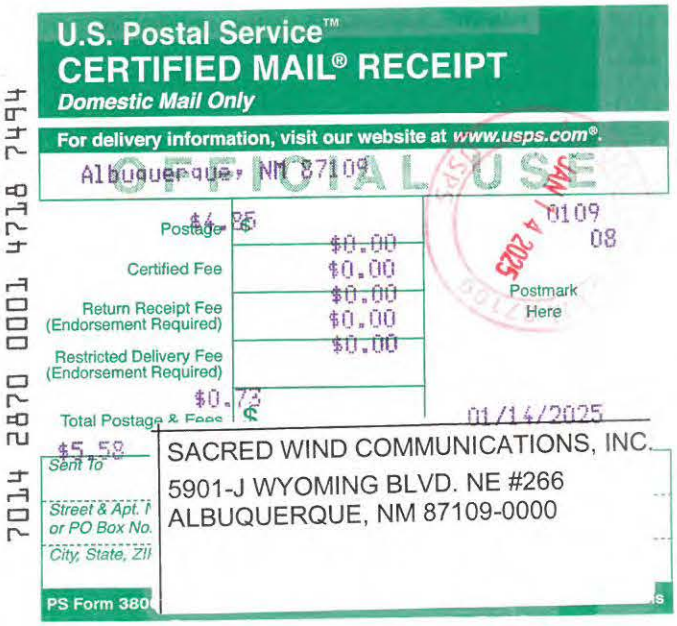
Sent To
WESTERN CONTRACTING CORPORATION

Street & Apt. No. or PO Box No.
PO BOX 3167

City, State, ZIP+4
SIOUX CITY , IA 51102-3167

PS Form 3800

7014 2870 0001 4718 7487



U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Albuquerque, NM 87109

OFFICIAL USE

Postage	$4.85
Certified Fee	$0.00
Return Receipt Fee (Endorsement Required)	$0.00
Restricted Delivery Fee (Endorsement Required)	$0.00
	$0.00
Total Postage & Fees	$0.73
	$5.58

Postmark Here
JAN 14 2025
01/14/2025
0109
08

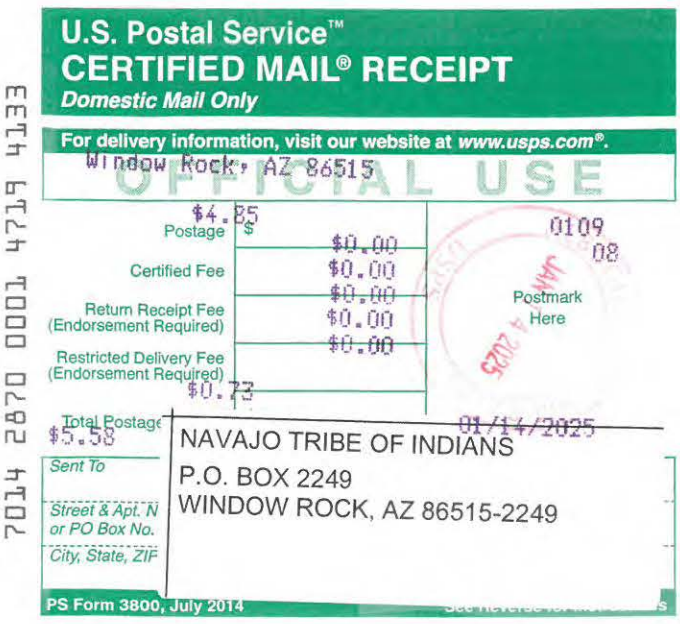
Sent To
SACRED WIND COMMUNICATIONS, INC.

Street & Apt. No. or PO Box No.
5901-J WYOMING BLVD. NE #266

City, State, ZIP+4
ALBUQUERQUE, NM 87109-0000

PS Form 3800

7014 2870 0001 4718 7494



U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Window Rock, AZ 86515

OFFICIAL USE

Postage	$4.85
Certified Fee	$0.00
Return Receipt Fee (Endorsement Required)	$0.00
Restricted Delivery Fee (Endorsement Required)	$0.00
	$0.00
Total Postage	$0.73
	$5.58

Postmark Here
JAN 14 2025
01/14/2025
0109
08

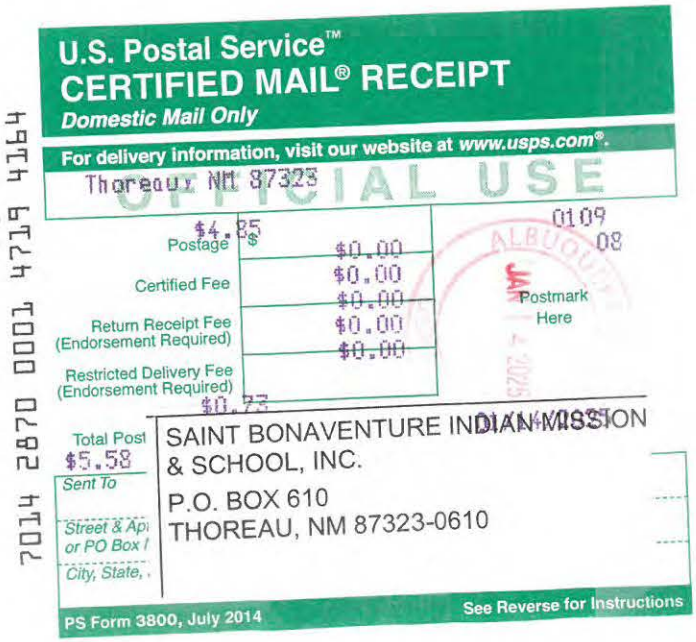
Sent To
NAVAJO TRIBE OF INDIANS

Street & Apt. No. or PO Box No.
P.O. BOX 2249

City, State, ZIP+4
WINDOW ROCK, AZ 86515-2249

PS Form 3800, July 2014

7014 2870 0001 4719 4133



U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Thoreau, NM 87323

OFFICIAL USE

Postage	$4.85
Certified Fee	$0.00
Return Receipt Fee (Endorsement Required)	$0.00
Restricted Delivery Fee (Endorsement Required)	$0.00
	$0.00
Total Postage	$0.73
	$5.58

Postmark Here
JAN 14 2025
01/14/2025
0109
08

Sent To
SAINT BONAVENTURE INDIAN MISSION & SCHOOL, INC.

Street & Apt. No. or PO Box No.
P.O. BOX 610

City, State, ZIP+4
THOREAU, NM 87323-0610

PS Form 3800, July 2014 See Reverse for Instructions

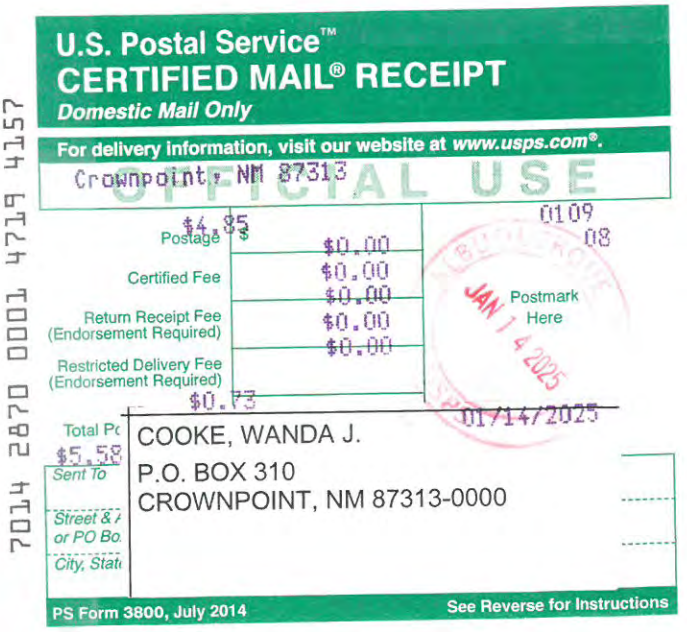
7014 2870 0001 4719 4164

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Thoreau, NM 87323
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
$0.73
Total Postage & Fees $5.58
0109 08
Postmark Here
JAN 14 2025
01/14/2025
Sent To PALMER, PATRICIA L.
Street & Apt. No., or PO Box No. P.O. BOX 255
City, State, ZIP+4® THOREAU, NM 87323-0255
PS Form 3800, July 2014 See Reverse for Instructions
7014 2870 0001 4719 5000

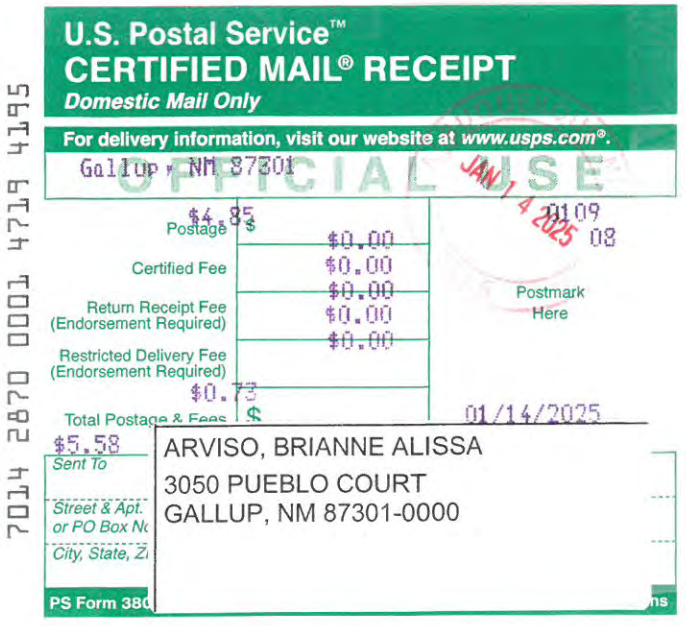
U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Thoreau, NM 87323
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
$0.73
Total Postage & Fees $5.58
0109 08
Postmark Here
JAN 14 2025
01/14/2025
Sent To HARRIS, WAYNE & KATHY
Street & Apt. No., or PO Box No. P.O. BOX 780
City, State, ZIP+4® THOREAU, NM 87323-0780
PS Form 3800, July 2014 See Reverse for Instructions
7014 2870 0001 4719 4102

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Thoreau, NM 87323
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
$0.73
Total Postage & Fees $5.58
0109 08
Postmark Here
JAN 14 2025
01/14/2025
Sent To RANGEL, ELIAS W. & OURINE L.
Street & Apt. No., or PO Box No. P.O. BOX 6
City, State, ZIP+4® THOREAU, NM 87323-0000
PS Form 3800, July 2014 See Reverse for Instructions
7014 2870 0001 4719 4126

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Thoreau, NM 87323
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
$0.73
Total Postage & Fees $5.58
0109 08
Postmark Here
JAN 14 2025
01/14/2025
Sent To STILLHAMMER, KENNETH V. & LAVERNE
Street & Apt. No., or PO Box No. P.O. BOX 580
City, State, ZIP+4® THOREAU, NM 87323-0580
PS Form 3800, July 2014 See Reverse for Instructions
7014 2870 0001 4719 4140



U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Crownpoint, NM 87313
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
$0.73
Total Postage & Fees $5.58
0109 08
Postmark Here
JAN 14 2025
01/14/2025
Sent To COOKE, WANDA J.
Street & Apt. No., or PO Box No. P.O. BOX 310
City, State, ZIP+4® CROWNPOINT, NM 87313-0000
PS Form 3800, July 2014 See Reverse for Instructions
7014 2870 0001 4719 4157



U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Gallup, NM 87301
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
$0.73
Total Postage & Fees $5.58
0109 08
Postmark Here
JAN 14 2025
01/14/2025
Sent To ARVISO, BRIANNE ALISSA
Street & Apt. No., or PO Box No. 3050 PUEBLO COURT
City, State, ZIP+4® GALLUP, NM 87301-0000
PS Form 3800, July 2014 See Reverse for Instructions
7014 2870 0001 4719 4195

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
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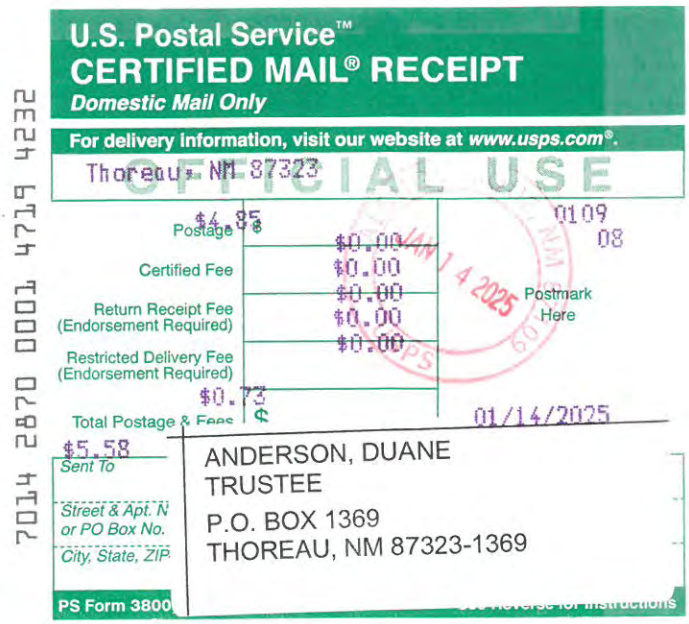
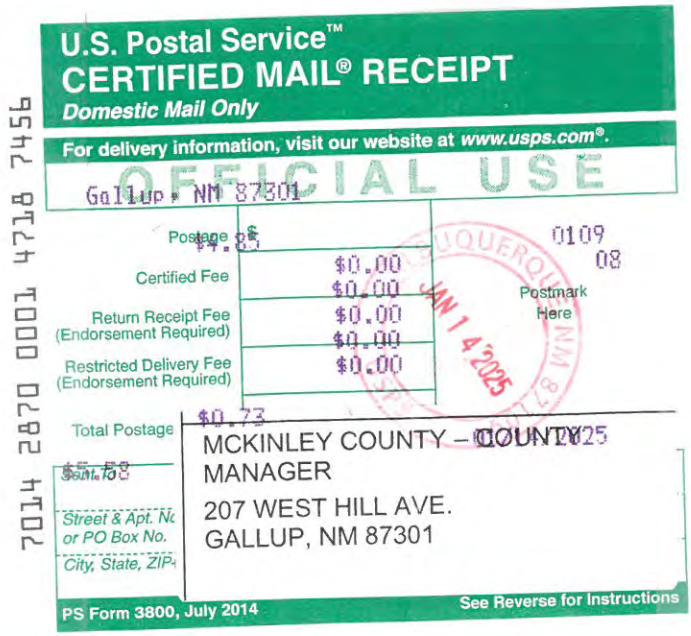
For delivery information, visit our website at www.usps.com®.
Thoreau, NM 87323
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
$0.73
Total Postag $5.58
Sent To
Street & Apt. N or PO Box No.
City, State, ZIF
0109 08
Postmark Here
ALBUQUERQUE, NM 87101 JAN 14 2025
01/14/2025
DESAUTELS, KEITH & LARSON, ANNA
16 HIGHWAY 612
THOREAU, NM 87323-0000
PS Form 3800,
See Reverse for Instructions
7014 2870 0001 4719 4218

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Thoreau, NM 87323
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
$0.73
Total Postage & Fees $5.58
Sent To
Street & Api or PO Box I
City, State,
0109 08
Postmark Here
ALBUQUERQUE, NM 87101 JAN 14 2025
01/14/2025
MARTINEZ, MICHAEL P. P.O. BOX 664
THOREAU, NM 87323-0664
PS Form 38
See Reverse for Instructions
7014 2870 0001 4718 7432

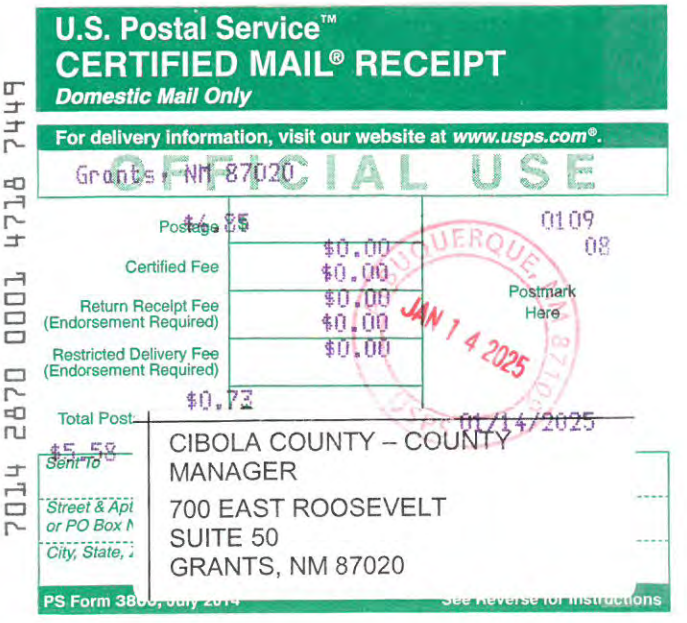
U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Roanoke, TX 76262
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
$0.73
Total Postage & $5.58
Sent To
Street & Apt. No or PO Box No.
City, State, ZIP+
0109 08
Postmark Here
ALBUQUERQUE, NM 87101 JAN 14 2025
01/14/2025
NEZ, MICHAEL M.
In Care Of RASHAD MOORE DFW5-4
1 FIRST PRIOR WAY
WESTLAKE , TX 76262-0000
PS Form 3800,
See Reverse for Instructions
7014 2870 0001 4719 4249



U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Thoreau, NM 87323
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
$0.73
Total Postage & Fees $5.58
Sent To
Street & Apt. N or PO Box No.
City, State, ZIP
0109 08
Postmark Here
ALBUQUERQUE, NM 87101 JAN 14 2025
01/14/2025
ANDERSON, DUANE
TRUSTEE
P.O. BOX 1369
THOREAU, NM 87323-1369
PS Form 3800
See Reverse for Instructions
7014 2870 0001 4719 4232



U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Gallup, NM 87301
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
$0.73
Total Postage
Sent To
Street & Apt. No or PO Box No.
City, State, ZIP+
0109 08
Postmark Here
ALBUQUERQUE, NM 87101 JAN 14 2025
MCKINLEY COUNTY – COUNTY MANAGER
207 WEST HILL AVE.
GALLUP, NM 87301
PS Form 3800, July 2014
See Reverse for Instructions
7014 2870 0001 4718 7456



U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only
For delivery information, visit our website at www.usps.com®.
Grants, NM 87020
OFFICIAL USE
Postage $4.85
Certified Fee $0.00
Return Receipt Fee (Endorsement Required) $0.00
Restricted Delivery Fee (Endorsement Required) $0.00
$0.73
Total Post
Sent To
Street & Api or PO Box N
City, State,
0109 08
Postmark Here
ALBUQUERQUE, NM 87101 JAN 14 2025
01/14/2025
CIBOLA COUNTY – COUNTY MANAGER
700 EAST ROOSEVELT
SUITE 50
GRANTS, NM 87020
See Reverse for Instructions
7014 2870 0001 4718 7449

McKinley County

Account Information

Account: R061594

Location	Owner Information	Assessment History
Situs Address ***NOT FOR VERIFICATION***	**Owner Name** ANDERSON, DUANE TRUSTEE	**Actual Value** (2024): $52,130
City NEAR THOREAU	**Owner Address** P.O. BOX 1369	**Primary Taxable** $17,663
Tax Area 211 - OUTSIDE RES RSU / 211	THOREAU, NM 87323-1369	**Tax Area:** 211 **Mill Levy** 29.499
Parcel Number 2-076-078-258-215		
Legal Summary TRACT 2, BOUNDARY SURVEY AND LAND DIVISION OF A TRACT OF LAND in SECTION 4 T13N R13W, CONT. 406.7668 ACS M/L BK 13 PG 9853 4/26/99 DOC 341398 08/12/08 PLAT DOC 389153 06/06/19 CODE 2-076-078-258-215 LIVESTOCK ON P961345		

Type	Actual	Assessed	Acres	SQFT	Units
LAND	$3,430	$1,430	406.789	0.000	0.000
BUILDING	$48,700	$16,233	0.000	0.000	0.000

Tax History	
Tax Year	**Taxes**
*2025	$521.04
2024	$521.04

* Estimated

Images

tyler

Table of Notified Citizens

Name	Address	City	State	Zip Code
SAINT BONAVENTURE INDIAN MISSION & SCHOOL, INC.	P.O. BOX 610	THOREAU	NM	87323-0610
PALMER, PATRICIA L.	P.O. BOX 255	THOREAU	NM	87323-0255
NAVAJO TRIBE OF INDIANS	P.O. BOX 2249	WINDOW ROCK	AZ	86515-2249
HARRIS, WAYNE & KATHY	P.O. BOX 780	THOREAU	NM	87323-0780
RANGEL, ELIAS W. & OURINE L.	P.O. BOX 6	THOREAU	NM	87323-0000
STILLHAMMER, KENNETH V. & LAVERNE B.	P.O. BOX 580	THOREAU	NM	87323-0580
COOKE, WANDA J.	P.O. BOX 310	CROWNPOINT	NM	87313-0000
SACRED WIND COMMUNICATIONS, INC.	5901-J WYOMING BLVD. NE #266	ALBUQUERQUE	NM	87109-0000
WESTERN CONTRACTING CORPORATION	PO BOX 3167	SIOUX CITY	IA	51102-3167
RICO MOTOR CO.	220 SOUTH FIFTH STREET	GALLUP	NM	87301-0000
MURPHY, TOM & PEGGIE	17 ROAD 4954	BLOOMFIELD	NM	87413-0000
FREELAND, JOYCE & BLOOD, NANCY D/B/A TWO GIRLS ENT.	36 SUNRISE	THOREAU	NM	87323-0000
A & D REAL ESTATE LLC.	2411 EAST AZTEC	GALLUP	NM	87301-0000
SRPH INVESTMENTS, LLC.	15807 SNOWY PEAK LANE	FONTANA	CA	92336-0000
RADOSEVICH, JOHN J. JR	2605 COPPER DR.	AMARILLO	TX	79108-0000
BECENTI, THOMPSON L. & VANGIE K.	P.O. BOX 475	GAMERCO	NM	87317-0000
NAVAJO NATION OIL & GAS CO.	P.O. BOX 4439	WINDOW ROCK	AZ	86515-4439
ARVISO, BRIANNE ALISSA	3050 PUEBLO COURT	GALLUP	NM	87301-0000
DESAUTELS, KEITH & LARSON, ANNA	16 HIGHWAY 612	THOREAU	NM	87323-0000
MARTINEZ, MICHAEL P.	P.O. BOX 664	THOREAU	NM	87323-0664
NEZ, MICHAEL M.	DFW5-4 1 FIRST PRIOR WAY	WESTLAKE	TX	76262-0000
ANDERSON, DUANE TRUSTEE	P.O. BOX 1369	THOREAU	NM	87323-1369

Table of Notified Counties

Name	Address	City	State	Zip Code
MCKINLEY COUNTY – COUNTY MANAGER	207 WEST HILL AVE.	GALLUP	NM	87301
CIBOLA COUNTY – COUNTY MANAGER	700 EAST ROOSEVELT SUITE 50	GRANTS	NM	87020

January 14, 2025

CERTIFIED MAIL 7014 2870 0001 4718 7449
RETURN RECEIPT REQUESTED (certified mail is required, return receipt is optional)

Dear County Official,
El Paso Natural Gas Company, L.L.C. announces its application submittal to the New Mexico Environment Department for an air quality permit for the **modification** of its **compressor station** facility. The expected date of application submittal to the Air Quality Bureau is **January 17, 2025.**

The exact location for the proposed facility known as, **Bluewater Compressor Station**, is at latitude 35 deg 23 min 37.7016 sec, and longitude -108 deg 13 min 40.5984 sec. The approximate location of this facility is **3.1** miles **south** of **Thoreau, NM** in McKinley County.

The proposed **modification** consists of an update to the total sulfur (TS) content of the fuel gas used for the permitted stationary turbines to reflect the TS limit in EPNG's FERC tariff.

The estimated maximum quantities of any regulated air contaminant will be as follows in pound per hour (pph) and tons per year (tpy) and could change slightly during the course of the Department's review:

Pollutant:	Pounds per hour	Tons per year
Particulate Matter (PM)	2	5
PM_{10}	2	5
$PM_{2.5}$	2	5
Sulfur Dioxide (SO_2)	3	11
Nitrogen Oxides (NO_x)	93	392
Carbon Monoxide (CO)	22	84
Volatile Organic Compounds (VOC)	2	17
Total sum of all Hazardous Air Pollutants (HAPs)	3	10
Toxic Air Pollutant (TAP)	N/A	N/A
Green House Gas Emissions as Total CO_2e	N/A	93,150

The standard and maximum operating schedules of the facility will be 24 hours per day, 7 days per week, and a maximum of 52 weeks per year.

The owner and/or operator of the Facility is:
El Paso Natural Gas Company, L.L.C.
2 North Nevada Ave.
Colorado Springs, CO 80903

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

Please refer to the company name and site name, or send a copy of this notice along with your comments, since the Department may have not yet received the permit application. Please include a legible return mailing address with your comments. Once the Department has performed a preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

General information about air quality and the permitting process, and links to the regulations can be found at the Air Quality Bureau's website: www.env.nm.gov/air-quality/permitting-section-home-page/. The regulation dealing with public participation in the permit review process is 20.2.72.206 NMAC.

Attención
Este es un aviso de la oficina de Calidad del Aire del Departamento del Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usted desea información en español, por favor comuníquese con esa oficina al teléfono 505-629-3395.

Notice of Non-Discrimination
NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part 7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non-discrimination programs, policies or procedures, or if you believe that you have been discriminated against with respect to a NMED program or activity, you may contact: Non-Discrimination Coordinator, NMED, 1190 St. Francis Dr., Suite N4050, P.O. Box 5469, Santa Fe, NM 87502, (505) 827-2855, nd.coordinator@env.nm.gov. You may also visit our website at https://www.env.nm.gov/non-employee-discrimination-complaint-page/ to learn how and where to file a complaint of discrimination.

January 14, 2025

CERTIFIED MAIL 7014 2870 0001 4719 4232
RETURN RECEIPT REQUESTED (certified mail is required, return receipt is optional)

Dear Neighbor,
El Paso Natural Gas Company, L.L.C. announces its application submittal to the New Mexico Environment Department for an air quality permit for the **modification** of its **compressor station** facility. The expected date of application submittal to the Air Quality Bureau is **January 17, 2025.**

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Colorado Springs, CO 80903

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1-15 ODD
R059781
2 & 4
R051829
1 & 3
R207367
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R055182
1 3 5
R207276
7-23 ODD
R301018
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R061948
13-23 ODD
R653331
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R052000
2-22 EVEN
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R055476
13-23 ODD
R057703
22 & 24
R673811
14-20
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R055565
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R061859
16-24
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R208785
5 & 7
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R208787
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SEE LEGAL
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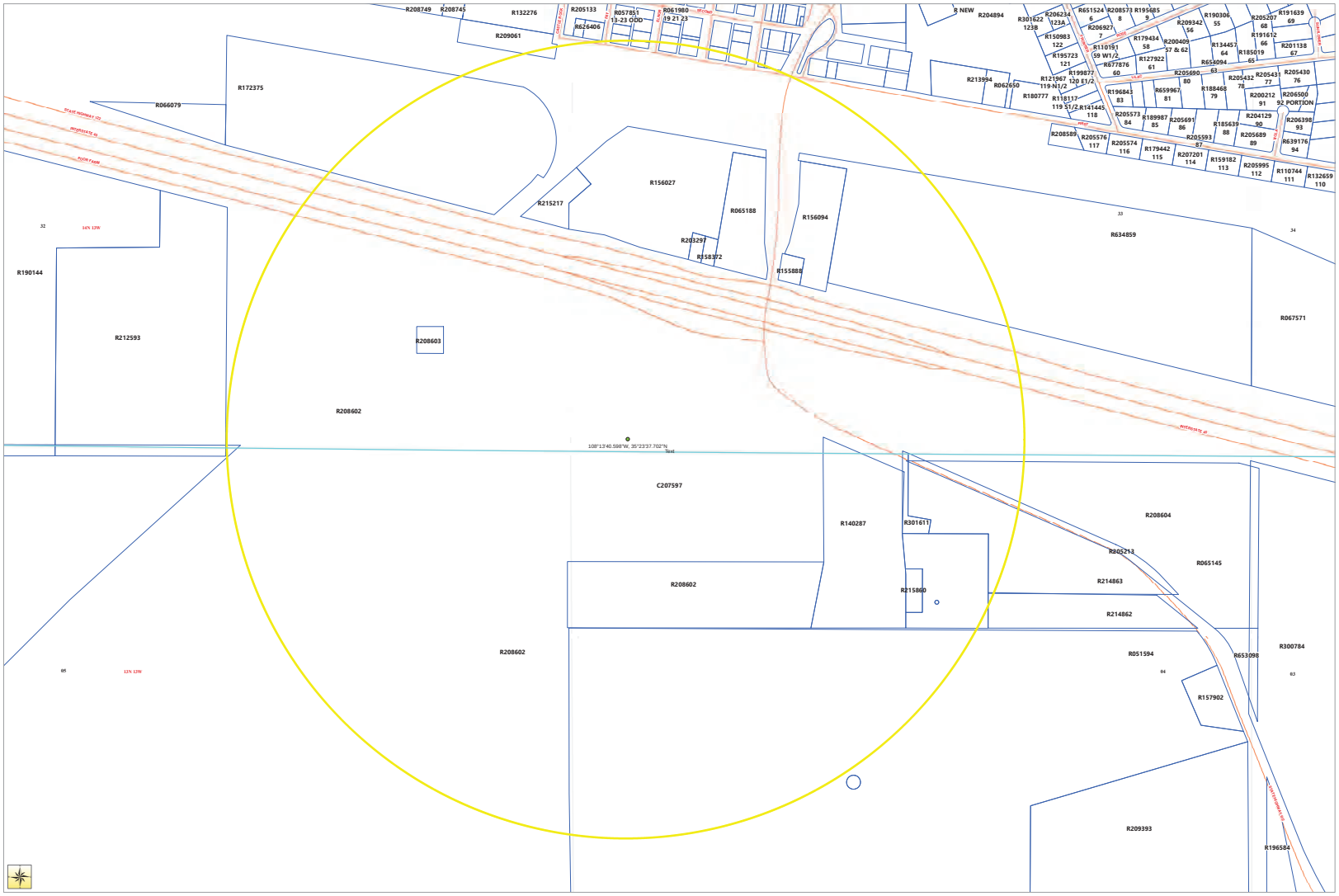
R065145
THIRD
SECOND
BROADWAY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R118117
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33
34
05
04
03
14N 13W
13N 12W
108°13'40.598"W, 35°23'37.702"N
Text
STATE HIGHWAY 122
INTERSTATE 40
FRONTAGE RD
INTERSTATE 40
OLD HIGHWAY 122

Vanderpump Rules' star mes Kennedy says he's ommitted to change after omestic violence arrest

Andrew Dalton
Entertainment Writer

LOS ANGELES — nderpump Rules" star es Kennedy says he etermined to make nges and seek sobriety r he was arrested on icion of misdemean- omestic violence for gedly throwing his riend to the ground. I am committed aking meaningful nges in my life, "he Tuesday via Insta- n, in his first public ement since the arrest. m taking time to focus ny sobriety, person- rowth, and being ent for my loved ones. igating challenging nents is not easy, but determined to learn, v, and move forward." Late on the night of . 10, officers in Bur- k, near Los Angeles, e sent to a residence r a report of a man and nan arguing, accord- to police records. A nan told officers that boyfriend lifted and w her to the ground.

Kennedy, 32, whose legal name is James Kennedy Georgiou, was arrested and released from jail after posting bail. The Burbank city attorney was to determine whether he would be charged; there was no immediate reply to an email seeking comment on whether charges are planned.

Authorities did not name the woman involved, but Kennedy is in a relationship with his "Vanderpump Rules" co-star Ally Lewber.

In her own Instagram statement on Saturday, Lewber said, "Thank you to everyone who has reached out with love and support and for checking in on me. I'm okay and taking the time I need right now."

Kennedy, the London-born reality TV star and DJ, has appeared on 10 seasons of "Vanderpump Rules," a Bravo and Peacock series based on the lives of workers at the swank restaurants of "Real Housewives of Beverly Hills" alum Lisa Vanderpump.

me' tour comes to an end

Paul R. Giunta/Invision/AP, file

ns during the Mariah Carey's Christmas Time ate Farm Arena in Atlanta.

ame with the elusive ience, and during an of "Always peared as

Christmas," turned 30. She told The Associated Press she originally felt apprehensive to record a holiday album and then gave in to the festive spirit.

"I was very young and was just

Legal Notice

LEGAL NOTICE
Thoreau - McKinley County
New Mexico

NOTICE OF AIR QUALITY PERMIT APPLICATION

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Toxic Air Pollutant (TAP)	N/A	N/A
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El Paso Natural Gas Company, L.L.C.
2 North Nevada Ave.
Colorado Springs, CO 80903

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Legal# 21195 Published in The Independent December 20, 2024.

LEGAL NOTICE
Tsaile - Apache County
Arizona

Contact Randy E. Joe, Owner's Representative, at (928) 724-6874/(928) 225-1038 to

Legal Notice

REPROGRAPHICS,4716 McCleod NE, Albuquerque, NM 87109, according to bid retrieval instructions on the ABQ Reprographics website: https://www.arigraphix.com/

Questions shall be addressed in writing to the Architect's office by email, to Dyron Murphy, AIA, at dmurphy@dm-architects.com.

The Owner reserves the right to reject any and all bids, to waive any informalities or irregularities when it is in the best interest of the Owner. Bids are valid for 120 calendar days upon submittal. Kayenta Township is not bound to enter into a contract under this ITB and may issue a subsequent ITB for the same services.

End of Invitation to Bid

Legal# 21183 Published in The Independent December 11, 20, & 28, 2024 and January 4, & 10, 2025.

LEGAL NOTICE
Dilkon - Navajo County
Arizona

REQUEST FOR PROPOSAL

Dine' College (the "Owner"), invites General Contractors to prepare and submit bids for the construction of the Dilkon Micro Campus Building Renovation. The site is located on the satellite campus of Dine' College at Dilkon, Arizona.

The work includes the renovation of an existing single-story building, with related architectural, civil, mechanical, plumbing, electrical, and sitework.

The construction contract will be awarded on a lump-sum basis. Bidders are subject to the Navajo Nation Business Preference Law; Title 5, Navajo Tribal Code, Section 201 through 218 and other applicable Navajo Nation Laws. Each bid must be submitted in accordance with Bidding Documents prepared by the Project Architect, Dyron Murphy Architects, P.C., Albuquerque, NM, (505) 830-0203.

Bids shall be submitted in accordance with the Instructions To Bidders and filed with Dine' College, on or before January 17, 2025 by 2:00 PM MST. Bids received after the specified date and time will not be accepted and returned unopened. No faxed or emailed bids will be accepted.

Bid Documents may be obtained in either digital format online, or in print format at ALBUQUERQUE REPROGRAPHICS, www.ariplans.com, Albuquerque, NM 87109 (505) 884-0862. Printing and shipping charges are the sole responsibility of the Bidder requesting documents.

Bid documents may be examined at the following locations:

Construction Reporter, 1607 2nd St., NW, Albuquerque, NM 87107
Dodge Construction Network, 2860 S State Hwy 161 Ste 160 #501, Grand Prairie Tx 75052, www.construction.com

Questions regarding this project should be addressed in writing to

Affidavit of Publication

STATE OF NEW MEXICO

) SS

COUNTY OF MCKINLEY

Lenora James being duly sworn upon oath, deposes and says:

As LEGAL CLERK of The Independent, a newspaper published in and having a general circulation in McKinley County, New Mexico and in the City of Gallup, New Mexico and having a general circulation in Cibola County, New Mexico and in the City of Grants, New Mexico and having a general circulation in Apache County, Arizona and in the City of St. Johns and in the City of Window Rock, Arizona therein: that this affiant makes the affidavit based upon personal knowledge of the facts herein sworn to. That the publication, a copy of which is hereto attached was published in said newspaper during the period time of publication and said notice was published in the newspaper proper, and not in a supplement thereof, for One Time, the first publication being on the _____ day of _____, 2024, the second publication being on the _____ day of _____, 2024, the third publication being on the _____ day of _____, 2024,

and the last publication being on the 20th day of December, 2024. That such newspaper, in which such notice or advertisement was published, is now and has been at all times material hereto, duly qualified for such purpose, and to publish legal notices and advertisements within the meaning of Chapter 12, of the statutes of the State of New Mexico, 1941 compilation,

Lenora James
Affiant

Sworn and Subscribed to before me this 23rd day of December, A.D., 2024.

Diane Chavez
Notary Public

STATE OF NEW MEXICO
NOTARY PUBLIC
DIANE CHAVEZ
Commission #: 1102891
Expiration Date: 09/06/2025

LEGAL NOTICE
Thoreau - McKinley County
New Mexico

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Legal# 21195 Published in The Independent December 20, 2024

Automotive in brief

German auto supplier Bosch to cut 5,500 jobs in further sign of carmakers' woes

FRANKFURT, Germany (AP) — Germany's technology and services company Bosch said Friday it planned to reduce its automotive division workforce by as many as 5,500 jobs in the next several years in another sign of the headwinds hitting the German and global auto industries.

The company cited stagnating global auto sales, too much factory capacity in the auto industry compared with sales prospects and a slower than expected transition to electric-powered, software-controlled vehicles.

The news comes two days after Ford Motor Co. announced plans to drop 4,000 jobs in Europe, and with Volkswagen employees threatening work stoppages over what they say management has told them are plans to close as many as three factories in Germany. Revenue at Stellantis, created through the 2021 merger of PSA Peugeot and Fiat Chrysler Automobiles, tumbled 27% in its most recent quarter that ended this fall.

Auto sales have slowed this year in Europe as consumers stung by inflation hold back on spending, while automakers have sunk billions into developing electric cars only to see slower sales than expected and new competition from cheaper Chinese brands. The German government abruptly cancelled purchase incentives at the end of last year, sending electric vehicles sales in that country down by 27% over the first nine months of this year.

Iran to shut offices, colleges and schools in Tehran because of air pollution

TEHRAN, Iran (AP) — Iran announced Tuesday that all governmental offices, universities, and schools in the province of Tehran will be closed for two days because of poor air quality, state TV reported.

The capital city of Tehran — home to over 10 million people — saw the closure of elementary schools and kindergartens on Saturday and Sunday, but authorities said Tuesday that because of increasing pollution, all governmental offices, universities and schools will be closed on Wednesday and Thursday, adding that schooling will continue on online platforms.

The TV report also said that banks, essential public services and health centers would remain open on those days.

Authorities also announced that schools and universities in neighboring Alborz province, and the central province of Isfahan will be closed on Wednesday and Thursday.

In Iran, schools usually work from Saturday to Wednesday.

On Tuesday visibility was low in Tehran, and authorities warned of poor air quality and advised the elderly, sick, and children to take extra precautions.

From time to time, authorities respond to the pollution with similar measures.

Tehran's air quality is among the worst in the world. The smog is mostly caused by heavy traffic due to millions of fuel-burning cars, motorbikes and factory emissions. It worsens during the cold season because of a lack of wind and rain.

The city is surrounded by tall hills and mountains on three sides. Cold, stagnant air settles in the valley, trapping automotive and other emissions that cannot escape.

Courtesy of Edmunds via AP

This photo provided by Edmunds shows the 2025 Chevy Silverado 1500 Trail Boss. Besides four-wheel drive, the Trail Boss is outfitted with a lifted suspension, stronger shock absorbers, underbody skid plates and all-terrain tires.

Courtesy of Edmunds via AP

This photo provided by Edmunds shows the 2025 Ford F-150 Tremor, which features standard four-wheel drive, a choice of two V8s, and Trail Turn Assist, a feature that brakes the inside rear wheel to tighten the turning radius.

Edmunds: These are the best full-size trucks for daily driving and off-roading

By Nick Kuczewski
Edmunds

Full-size trucks are hugely popular thanks to their ability to get tough jobs done. This characteristic equally applies to those times when paved roads end and off-road hardware becomes essential to getting to your given destination. The automotive experts at Edmunds have compiled four full-size light-duty pickups that won't wilt over rough landscapes. They've also kept in mind that all-terrain adventures should leave a little money left over for things outside of monthly truck payments. With this in mind, they've steered clear of some of the priciest go-anywhere models and instead focused on ones that balance on-road comfort with off-road aptitude at relative affordability. All prices listed below include the destination charge.

Chevrolet Silverado 1500 Trail Boss

The Chevrolet Silverado 1500 is well suited for fulfilling a broad range of driving needs. The Trail Boss option package can be applied to both the Custom and LT trim levels and provides an appealing mix of capability and affordability. Available exclusively with four-wheel drive, the Trail Boss is outfitted with a lifted suspension, stronger shock absorbers, underbody skid plates and all-terrain tires. During road tests, Edmunds complimented the Silverado for staying true to its old-school roots while simultaneously staying updated with the latest onboard technology.

The Trail Boss can be had with three available engines. These consist of a standard 310-horsepower turbocharged four-cylinder, a 305-horsepower diesel-powered six-cylinder, and a 355-horsepower 5.3-liter V8. There's also a more expensive LT Trail Boss version with a few more standard features and an optional 420-horsepower 6.2-liter V8.

2025 Chevrolet Silverado 1500 Custom Trail Boss starting price: $53,795

Ford F-150 Tremor

For decades, the Ford F-Series has been America's best-selling full-size truck. It's pretty easy to see why. The 2025 Ford F-150 can be customized to be anything from a no-nonsense work truck to an opulent luxury machine. The Tremor version is meant for off-roading. It comes standard with features such as a Tremor-specific suspension to enhance off-road performance, underbody protective skidplates, and a locking rear differential and all-terrain tires to maximize available grip.

The Tremor also boasts some high-tech means of scrambling over rugged terrain. This includes Trail Turn Assist, a feature that brakes the inside rear wheel to tighten the turning radius. It's a nifty piece of kit when navigating along tight trails. Under the hood is standard four-wheel drive and a choice of two engines: a 400-horsepower V8 or a 400-horsepower turbocharged V6. The V8 has the burlier exhaust note but the V6 makes more torque, which is helpful for acceleration and towing.

2025 Ford F-150 Tremor starting price: $66,810

GMC Sierra 1500 AT4

Much of what holds true with the Chevrolet Silverado also applies to the GMC Sierra 1500. That's because the two trucks share the same mechanical bits and specifications. But befitting for a slightly more upmarket brand, GMC kits out the Sierra 1500 with nicer cabin materials and luxury add-ons. Nor is the Sierra afraid to get itself dirty when it comes to off-road duty. It's more than capable of off-roading tasks thanks to its 2-inch suspension lift, standard four-wheel drive and underbody skid plates.

The all-terrain-themed trims consist of the AT4 and AT4X. The latter has a slightly higher degree of rock-crawling capability with some extra features including a locking front differential. Both versions come standard with a 305-horsepower turbocharged diesel engine or offer an available 420-horsepower 6.2-liter V8. During testing, Edmunds praised the strong acceleration provided by the available 6.2-liter V8.

2025 GMC Sierra AT4 starting price: $68,795

Ram 1500 Rebel

The Ram 1500 is significantly updated for 2025. Highlights include slight exterior styling tweaks, some new technology features and an updated cabin. The Ram 1500 Rebel is still in the line-up too. It comes outfitted with four-wheel drive, upgraded Bilstein shock absorbers, an electronic locking rear axle and all-terrain tires. A trick air suspension is available that further allows the driver to raise the truck to increase body clearance over off-road obstacles.

The Rebel can be decked out in no less than seven choices of two-tone color schemes, complete with splashy Rebel decals along the flanks of the cargo bed. Unlike its Ford, Chevy and GMC rivals, the Rebel has only one choice of engine, and it's not a V8. But that's not a demerit. Edmunds has found that the new-for-2025 420-horsepower turbocharged inline-six engine provides the quickest acceleration of the four trucks here.

2025 Ram 1500 Rebel starting price: $66,190

Edmunds says

Truck owners who are serious about venturing off the beaten path would be smart to have this quartet of go-anywhere machines on their shopping list this holiday season.

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Legal# 21195 Published in The Independent December 20, 2024

Section 10

Written Description of the Routine Operations of the Facility

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A written description of the routine operations of the facility. Include a description of how each piece of equipment will be operated, how controls will be used, and the fate of both the products and waste generated. For modifications and/or revisions, explain how the changes will affect the existing process. In a separate paragraph describe the major process bottlenecks that limit production. The purpose of this description is to provide sufficient information about plant operations for the permit writer to determine appropriate emission sources.

Bluewater Compressor Station is a natural gas compressor station that compresses natural gas and delivers compressed gas to a pipeline for mainline transportation. This facility consists of three natural gas-fired Solar Taurus 60-7302 turbines, identified as units B-01, B-02, and B-03, which provide power to the compressors. An auxiliary emergency generator engine (AUX-B-01), Waukesha H-24 GL HCR is maintained at the facility to provide electric power in the event that service from the local utility is interrupted. This unit is exempt pursuant to 20.2.72.202.B.(3) NMAC).

Section 11
Source Determination

Source submitting under 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC

Sources applying for a construction permit, PSD permit, or operating permit shall evaluate surrounding and/or associated sources (including those sources directly connected to this source for business reasons) and complete this section. Responses to the following questions shall be consistent with the Air Quality Bureau's permitting guidance, Single Source Determination Guidance, which may be found on the Applications Page in the Permitting Section of the Air Quality Bureau website.

Typically, buildings, structures, installations, or facilities that have the same SIC code, that are under common ownership or control, and that are contiguous or adjacent constitute a single stationary source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes. Submission of your analysis of these factors in support of the responses below is optional, unless requested by NMED.

A. Identify the emission sources evaluated in this section (list and describe)**:**

See Table 2-A in Section 2 of this application.

B. Apply the 3 criteria for determining a single source:

SIC Code: Surrounding or associated sources belong to the same 2-digit industrial grouping (2-digit SIC code) as this facility, OR surrounding or associated sources that belong to different 2-digit SIC codes are support facilities for this source.

☑ **Yes** ☐ **No**

Common Ownership or Control: Surrounding or associated sources are under common ownership or control as this source.

☑ **Yes** ☐ **No**

Contiguous or Adjacent: Surrounding or associated sources are contiguous or adjacent with this source.

☑ **Yes** ☐ **No**

C. Make a determination:

☑ The source, as described in this application, constitutes the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes. If in "A" above you evaluated only the source that is the subject of this application, all "**YES**" boxes should be checked. If in "A" above you evaluated other sources as well, you must check **AT LEAST ONE** of the boxes "**NO**" to conclude that the source, as described in the application, is the entire source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes.

☐ The source, as described in this application, **does not** constitute the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes (A permit may be issued for a portion of a source). The entire source consists of the following facilities or emissions sources (list and describe):

Section 12

Section 12.A
PSD Applicability Determination for All Sources

(Submitting under 20.2.72, 20.2.74 NMAC)

A PSD applicability determination for all sources. For sources applying for a significant permit revision, apply the applicable requirements of 20.2.74.AG and 20.2.74.200 NMAC and to determine whether this facility is a major or minor PSD source, and whether this modification is a major or a minor PSD modification. It may be helpful to refer to the procedures for Determining the Net Emissions Change at a Source as specified by Table A-5 (Page A.45) of the EPA New Source Review Workshop Manual to determine if the revision is subject to PSD review.

A. This facility is:

- ☐ **a minor PSD source before and after this modification (if so, delete C and D below).**
- ☐ **a major PSD source before this modification. This modification will make this a PSD minor source.**
- ☑ **an existing PSD Major Source that has never had a major modification requiring a BACT analysis.**
- ☐ **an existing PSD Major Source that has had a major modification requiring a BACT analysis**
- ☐ **a new PSD Major Source after this modification.**

B. **This facility is not one of the listed 20.2.74.501 Table I – PSD Source Categories. The "project" emissions** for this modification are **not significant. This application will be increasing the calculated SO_2 lb/hr and tpy values of regulated emission sources at this facility below forty (40) tpy, which is under significance threshold for SO_2 emission rates per NMED guidance. The "project" emissions listed below do only result from changes described in this permit application, thus no emissions from other revisions or modifications, past or future to this facility. Also, specifically discuss whether this project results in "de-bottlenecking", or other associated emissions resulting in higher emissions. The project emissions (before netting) for this project are as follows [see Table 2 in 20.2.74.502 NMAC for a complete list of significance levels]:**

a. **NOx: 00.0 TPY**
b. **CO: 00.0 TPY**
c. **VOC: 00.0 TPY**
d. **SOx: 4.95 TPY**
e. **PM: 00.0 TPY**
f. **PM10: 00.0 TPY**
g. **PM2.5: 00.0 TPY**
h. **Fluorides: 00.0 TPY**
i. **Lead: 0.00 TPY**
j. **Sulfur compounds (listed in Table 2): 00.0 TPY**
k. **GHG: 00.0 TPY**

C. **Netting is not required (project is not significant).**

D. **BACT** is **not required for this modification, as this application is a minor modification.**

E. If this is an existing PSD major source, or any facility with emissions greater than 250 TPY (or 100 TPY for 20.2.74.501 Table 1 – PSD Source Categories), determine whether any permit modifications are related, or could be considered a single project with this action, and provide an explanation for your determination whether a PSD modification is triggered.

Section 13

Determination of State & Federal Air Quality Regulations

This section lists each state and federal air quality regulation that may apply to your facility and/or equipment that are stationary sources of regulated air pollutants.

Not all state and federal air quality regulations are included in this list. Go to the Code of Federal Regulations (CFR) or to the Air Quality Bureau's regulation page to see the full set of air quality regulations.

Required Information for Specific Equipment:
For regulations that apply to specific source types, in the 'Justification' column **provide any information needed to determine if the regulation does or does not apply**. **For example**, to determine if emissions standards at 40 CFR 60, Subpart IIII apply to your three identical stationary engines, we need to know the construction date as defined in that regulation; the manufacturer date; the date of reconstruction or modification, if any; if they are or are not fire pump engines; if they are or are not emergency engines as defined in that regulation; their site ratings; and the cylinder displacement.

Required Information for Regulations that Apply to the Entire Facility:
See instructions in the 'Justification' column for the information that is needed to determine if an 'Entire Facility' type of regulation applies (e.g. 20.2.70 or 20.2.73 NMAC).

Regulatory Citations for Regulations That Do Not, but Could Apply:
If there is a state or federal air quality regulation that does not apply, but you have a piece of equipment in a source category for which a regulation has been promulgated, you must **provide the low level regulatory citation showing why your piece of equipment is not subject to or exempt from the regulation. For example** if you have a stationary internal combustion engine that is not subject to 40 CFR 63, Subpart ZZZZ because it is an existing 2 stroke lean burn stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, your citation would be 40 CFR 63.6590(b)(3)(i). **We don't want a discussion of every non-applicable regulation, but if it is possible a regulation could apply, explain why it does not. For example,** if your facility is a power plant, you do not need to include a citation to show that 40 CFR 60, Subpart OOO does not apply to your non-existent rock crusher.

Regulatory Citations for Emission Standards:
For each unit that is subject to an emission standard in a source specific regulation, such as 40 CFR 60, Subpart OOO or 40 CFR 63, Subpart HH, include the low level regulatory citation of that emission standard. Emission standards can be numerical emission limits, work practice standards, or other requirements such as maintenance. **Here are examples:** a glycol dehydrator is subject to the general standards at 63.764C(1)(i) through (iii); an engine is subject to 63.6601, Tables 2a and 2b; a crusher is subject to 60.672(b), Table 3 and all transfer points are subject to 60.672(e)(1)

Federally Enforceable Conditions:
All federal regulations are federally enforceable. All Air Quality Bureau State regulations are federally enforceable except for the following: affirmative defense portions at 20.2.7.6.B, 20.2.7.110(B)(15), 20.2.7.11 through 20.2.7.113, 20.2.7.115, and 20.2.7.116; 20.2.37; 20.2.42; 20.2.43; 20.2.62; 20.2.63; 20.2.86; 20.2.89; and 20.2.90 NMAC. Federally enforceable means that EPA can enforce the regulation as well as the Air Quality Bureau and federally enforceable regulations can count toward determining a facility's potential to emit (PTE) for the Title V, PSD, and nonattainment permit regulations.

INCLUDE ANY OTHER INFORMATION NEEDED TO COMPLETE AN APPLICABILITY DETERMINATION OR THAT IS RELEVENT TO YOUR FACILITY'S NOTICE OF INTENT OR PERMIT.

EPA Applicability Determination Index for 40 CFR 60, 61, 63, etc: http://cfpub.epa.gov/adi/

Table for State Regulations:

State Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.1 NMAC	General Provisions	Yes	Facility	General Provisions apply to Notice of Intent, Construction, and Title V permit applications.
20.2.3 NMAC	Ambient Air Quality Standards NMAAQS	Yes	Facility	20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Total Suspended Particulates, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide. This facility meets maximum allowable concentrations of TSP, SO_2, H_2S, CO, NO_x, and CO under this regulation.
20.2.7 NMAC	Excess Emissions	Yes	Facility	This regulation establishes requirements for the facility if operations at the facility result in any excess emissions. The owner or operator will operate the source at the facility having an excess emission, to the extent practicable, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions. The facility will also notify the NMED of any excess emission per 20.2.7.110 NMAC. All Title V major sources are subject to Air Quality Control Regulations, as defined in 20.2.7 NMAC, and are thus subject to the requirements of this regulation.
20.2.23 NMAC	Fugitive Dust Control	No for permitted facilities, possible for NOIs	Facility	This facility is not defined as a notice of intent (NOI) per 20.2.73 NMAC.
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No	N/A	Not applicable as this facility does not contain oil burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit.
20.2.34 NMAC	Oil Burning Equipment: NO_2	No	N/A	Not applicable as this facility does not contain oil burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit.
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	No	N/A	Not applicable as this facility is not a "natural gas processing plant" as the term is understood.
20.2.37 and 20.2.36 NMAC	Petroleum Processing Facilities and Petroleum Refineries	No	N/A	**These regulations were repealed by the Environmental Improvement Board. If you had equipment subject to 20.2.37 NMAC before the repeal, your combustion emission sources are now subject to 20.2.61 NMAC.**
20.2.38 NMAC	Hydrocarbon Storage Facility	No	N/A	Not applicable as this facility is not a "petroleum processing facility" or "petroleum production facility" and does not contain a "tank battery" or a "hydrocarbon storage facility" associated with a "petroleum processing facility" as the terms are understood.
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	N/A	This facility is not a sulfur recovery plant as defined in this regulation; therefore, it does not apply.
20.2.50 NMAC	Oil and Gas Sector – Ozone Precursor Pollutants			This regulation establishes emission standards for volatile organic compounds (VOC) and oxides of nitrogen (NO_x) for oil and gas production, processing, compression, and transmission sources. 20.2.50 NMAC subparts below: Include the construction status of applicable units as “New”, “Existing”, “Relocation of Existing”, or “Reconstructed” as defined by this Part in your justification: Check the box for the subparts that are applicable: ☐113 – Engines and Turbines ☐114 – Compressor Seals N/A – This regulation only applies to oil & gas facilities located in Chaves, Dona Ana, Eddy, Lea, Rio Arriba, Sandoval, San Juan & Valencia counties. This facility is located in McKinley County, NM and is thus not subject to this regulation or any of its Subparts.

State Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
				☐115 – Control Devices and Closed Vent Systems ☐116 – Equipment Leaks and Fugitive Emissions ☐ 117 – Natural Gas Well Liquid Unloading ☐ 118 – Glycol Dehydrators ☐ 119 – Heaters ☐ 120 – Hydrocarbon Liquid Transfers ☐121 – Pig Launching and Receiving ☐122 – Pneumatic Controllers and Pumps ☐ 123 – Storage Vessels ☐124 – Well Workovers ☐ 125 – Small Business Facilities ☐126 – Produced Water Management Unit ☐127 – Flowback Vessels and Preproduction Operations
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	B-01, B-02, B-03	This regulation establishes controls on smoke and visible emissions from certain sources, including stationary combustion equipment. Units B-01 through B-03 are stationary combustion equipment that comply by using pipeline-quality natural gas.
20.2.70 NMAC	Operating Permits	Yes	Facility	This facility is a Title V major facility. The facility has been issued Title V Permit #P139-R4.
20.2.71 NMAC	Operating Permit Fees	Yes	Facility	This facility is subject to 20.2.70 NMAC and is in turn subject to 20.2.71 NMAC.
20.2.72 NMAC	Construction Permits	Yes	Facility	This facility is subject to 20.2.72 NMAC and has been issued NSR Permit #3004-M1.
20.2.73 NMAC	NOI & Emissions Inventory Requirements	Yes	Facility	All Title V major sources meet the applicability requirements of 20.2.73.300 NMAC. This regulation requires facilities to respond to request for inventory information. EPNG has and will continue to respond as required.
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	Yes	Facility	Bluewater Compressor Station is an existing PSD major source. The facility has not undergone a major modification and does not currently require a PSD permit.
20.2.75 NMAC	Construction Permit Fees	Yes	Facility	This regulation establishes a schedule of operating permit emission fees. The facility is subject to 20.2.71 NMAC (Operating Permit Emission Fees) and, therefore, is not subject to the requirements of this regulation, per 20.2.75.11.E. In the event of an NSR permit action, EPNG would be required to pay the appropriate filing and review fees.
20.2.77 NMAC	New Source Performance	Yes	B-01, B-02, B-03	This regulation establishes state authority to implement new source performance standards (NSPS) for stationary sources. Units B-01, B-02 and B-03 are subject to NSPS Subparts A and GG; therefore, this regulation applies.
20.2.78 NMAC	Emission Standards for HAPS	No	N/A	This regulation establishes state authority to implement emission standards for hazardous air pollutants subject to 40 CFR Part 61. This facility does not emit hazardous air pollutants which are subject to the requirements of 40 CFR Part 61 and is therefore not subject to this regulation.
20.2.79 NMAC	Permits – Nonattainment Areas	No	N/A	This regulation establishes the requirements for obtaining a non-attainment area permit. This facility is not located in a non-attainment area and therefore is not subject to this regulation.

State Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.80 NMAC	Stack Heights	No	N/A	This regulation establishes requirements for the evaluation of stack heights and other dispersion techniques. This regulation does not apply as all stacks at this facility follow good engineering practice.
20.2.82 NMAC	MACT Standards for source categories of HAPS	No	N/A	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63, as amended through August 29, 2013. Unit AUX-B-01 is subject to MACT ZZZZ and is, therefore, subject to this regulation; however, the engine is an exempt equipment under this permit and therefore has been excluded.

Table for Applicable Federal Regulations (Note: This is not an exhaustive list):

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
40 CFR 50	NAAQS	Yes	Facility	This regulation defines national ambient air quality standards. Bluewater Compressor Station meets all applicable national ambient air quality standards for PM_{10}, $PM_{2.5}$, SO_2, H_2S, CO, and NO_x under this regulation.
NSPS 40 CFR 60, Subpart A	General Provisions	Yes	B-01, B-02, B-03	This regulation defines general provisions for relevant standards that have been set under this part. Units B-01, B-02 and B-03 are subject to this regulation because Subpart GG applies to the turbines.
NSPS 40 CFR60.40a, Subpart Da	Subpart Da, Performance Standards for **Electric Utility Steam Generating Units**	No	N/A	Not applicable as there are no electric utility steam generating units at this facility.
NSPS 40 CFR60.40b Subpart Db	**Electric Utility Steam Generating Units**	No	N/A	This regulation establishes standards of performance for industrial-commercial institutional steam generating units. This regulation does not apply because this facility does not operate any industrial-commercial-institutional steam generating units.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	No	N/A	Not applicable as there are no small industrial-commercial-institutional steam generating units at the facility.
NSPS 40 CFR 60, Subpart Ka	Standards of Performance for **Storage Vessels for Petroleum Liquids** for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and **Prior** to July 23, 1984	No	N/A	This regulation establishes performance standards for storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. The capacities of the tanks at the facility are less than 40,000 gallons and are not subject to this regulation. [40 CFR Part 60.110a(a)]
NSPS 40 CFR 60, Subpart Kb	Standards of Performance for **Volatile Organic**	No	N/A	This facility does not have any tanks with a storage capacity equal to or greater than 75 cubic meters used to store volatile organic liquids (VOL) for which construction,

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
	Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced **After** July 23, 1984 and On or Before October 4, 2023			reconstruction or modification commenced after July 23, 1984 or on or before October 4, 2023.
NSPS 40 CFR 60, Subpart Kc	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced **After** October 4, 2023	No	N/A	This regulation establishes performance standards for storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after October 4, 2023. The capacities of the tanks at the facility are less than 20,000 gallons and are not subject to this regulation. [40 CFR Part 60.110c(c)]
NSPS 40 CFR 60.330 Subpart GG	**Stationary Gas Turbines**	Yes	B-01, B-02, B-03	This regulation sets standards of performance for certain stationary gas turbines. Units B-01, B-02 and B-03 have a heat input greater than the 10 MMBtu/hour threshold and were manufactured after the October 3, 1977 applicability date [40 CFR 60.330(a)]. Accordingly, this regulation applies.
NSPS 40 CFR 60, Subpart KKK	Leaks of VOC from **Onshore Gas Plants**	No	N/A	This regulation defines standards of performance for equipment leaks of VOC emissions from onshore natural gas processing plants for which construction, reconstruction, or modification commenced after January 20, 1984, and on or before August 23, 2011. This regulation does not apply as the facility is not a gas plant.
NSPS 40 CFR Part 60 Subpart LLL	Standards of Performance for **Onshore Natural Gas Processing**: SO_2 Emissions	No	N/A	This regulation establishes standards of performance for SO_2 emissions from onshore natural gas processing for which construction, reconstruction, or modification of the amine sweetening unit commenced after January 20, 1984 and on or before August 23, 2011. This regulation does not apply as this facility is not a natural gas processing plant.
NSPS 40 CFR Part 60 Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015	No	N/A	This regulation establishes standards of performance for crude oil and natural gas production, transmission and distribution. The facility does not have any affected units that have been modified or reconstructed on or after August 23, 2011 and before September 18, 2015. [40 CFR 60.5360]
NSPS 40 CFR Part	Standards of Performance for Crude Oil and	No	N/A	This regulation establishes standards of performance for crude oil and natural gas production, transmission and distribution. The facility does not have any affected

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
60 Subpart OOOOa	Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced **After** September 18, 2015 and On or Before December 6, 2022			units that have been modified or reconstructed after September 18, 2015 or before December 6, 2022.
NSPS 40 CFR Part 60 Subpart OOOOb	Standards of Performance for Crude Oil and Natural Gas Facilities for Which Construction, Modification or Reconstruction Commenced After December 6, 2022	No	N/A	This regulation establishes standards of performance for crude oil and natural gas production, transmission and distribution. The facility does not have any affected units that have been modified or reconstructed after December 6, 2022.
NSPS 40 CFR 60 Subpart IIII	Standards of performance for Stationary Compression Ignition Internal Combustion Engines	No	N/A	This regulation establishes standards of performance for stationary compression ignition combustion engines. This facility does not operate any compression ignition internal combustion engines. Accordingly, this regulation does not apply.
NSPS 40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	No	N/A	This regulation establishes standards of performance for stationary spark ignition combustion engines. AUX-B0-1 is a stationary SI ICE which was constructed prior to June 12, 2006; however, the engine is an exempt equipment under this permit and is therefore excluded.
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	No	N/A	The facility does not have any steam generating units and is therefore not subject to this regulation.
NSPS 40 CFR 60 Subpart UUUU	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units	No	N/A	This regulation establishes standards of performance for electric utility generating units. This facility does not operate any electric utility generating units and therefore this regulation does apply.
NSPS 40 CFR 60, Subparts WWW, XXX, Cc, and Cf	Standards of performance for Municipal Solid Waste (MSW) Landfills	No	N/A	The facility is not a municipal solid waste landfill and is therefore not subject to this regulation.
NESHAP 40 CFR 61 Subpart A	General Provisions	No	N/A	Bluewater Compressor Station does not emit or have threshold quantities of regulated substances at the facility and/or the facility is not involved in the triggering activity.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
NESHAP 40 CFR 61 Subpart E	National Emission Standards for **Mercury**	No	N/A	This regulation establishes a national emission standard for mercury. The facility does not have stationary sources which process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge [40 CFR Part 61.50]. The facility is not subject to this regulation.
NESHAP 40 CFR 61 Subpart V	National Emission Standards for **Equipment Leaks** (Fugitive Emission Sources)	No	N/A	This regulation establishes national emission standards for equipment leaks (fugitive emission sources). The facility does not have equipment that operates in volatile hazardous air pollutant (VHAP) service [40 CFR Part 61.240]. The regulated activities subject to this regulation do not take place at this facility. The facility is not subject to this regulation.
MACT 40 CFR 63, Subpart A	General Provisions	No	N/A	This regulation defines general provisions for relevant standards that have been set under this Subpart. Unit AUX-B-01 is subject to MACT ZZZZ, therefore Subpart A also applies; however, the engine is an exempt equipment under this permit and therefore has been excluded.
MACT 40 CFR 63.760 Subpart HH	**Oil and Natural Gas Production Facilities**	No	N/A	This regulation establishes national emission standards for hazardous air pollutants from oil and natural gas production facilities. This facility is not an Oil or Natural Gas Production Facility, as defined by this regulation therefore it is not subject to this regulation.
MACT 40 CFR 63 Subpart HHH		No	N/A	This facility is not a major source of HAPS, nor does it contain an affected unit. As stated in 63.1270(c), a facility that does not contain an affected source is not subject to the requirements of this subpart.
MACT 40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and Institutional Boilers & Process Heaters	No	N/A	This facility possesses no applicable boilers and process heater Units; therefore, this Subpart is not applicable.
MACT 40 CFR 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric Utility Steam Generating Unit	No	N/A	This facility possesses no coal & oil fire electric utility steam generating Units; therefore, this Subpart is not applicable.
MACT 40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (**RICE MACT**)	No	N/A	This regulation defines national emissions standards for HAPs for stationary reciprocating Internal Combustion Engines. Unit AUX-B-01 is an existing (constructed before 6/12/2006) auxiliary reciprocating engine for the backup generator located at an area source of HAPs. Per 40 CFR 63.6585, the unit is subject to the operation and maintenance requirements of the subpart; however, this engine is an exempt equipment under this permit and therefore has been excluded.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
40 CFR 64	**Compliance Assurance Monitoring**	No	N/A	This regulation defines compliance assurance monitoring. Bluewater Compressor Station is a Title V major source. However, none of the units at the facility are required to use a control device to achieve compliance with an emission limit.
40 CFR 68	**Chemical Accident Prevention**	No	N/A	This facility is regulated under DOT Office of Pipeline Safety Regulations (49 CFR 192, 193 and 195); therefore, it is not subject to this regulation. This regulation arises from section 112(r) of the Clean Air Act and establishes thresholds based on inventoried quantities of specific substances in process. As established at 40 CFR 68.3, the term "stationary source" does not apply to the transportation of any regulated substance or any other extremely hazardous substance under the provisions of this part, provided that such transportation is regulated under 49 CFR parts 192, 193, or 195 (DOT Office of Pipeline Safety Regulations).
Title IV – Acid Rain 40 CFR 72	**Acid Rain**	No	N/A	This part establishes the acid rain program. This part does not apply because the facility is not covered by this regulation. [40 CFR Part 72.6]
Title IV – Acid Rain 40 CFR 73	**Sulfur Dioxide** Allowance Emissions	No	N/A	This regulation establishes sulfur dioxide allowance emissions for certain types of facilities. This part does not apply because the facility is not the type covered by this regulation [40 CFR Part 73.2].
Title IV-Acid Rain 40 CFR 75	**Continuous Emissions Monitoring**	No	N/A	The facility does not generate commercial electric power or electric power for sale and is therefore not subject to this regulation.
Title IV – Acid Rain 40 CFR 76	**Acid Rain** Nitrogen Oxides **Emission Reduction Program**	No	N/A	This regulation establishes an acid rain nitrogen oxides emission reduction program. This regulation applies to each coal-fired utility unit that is subject to an acid rain emissions limitation or reduction requirement for SO_2. This part does not apply because the facility does not operate any coal-fired units [40 CFR Part 76.1].
Title VI – 40 CFR 82	Protection of **Stratospheric Ozone**	Yes	Facility	EPNG owns appliances containing CFCs and is therefore subject to this requirement. However, this requirement imposes no obligations on the facility beyond those imposed on any individual or corporate owner of such appliances, and is mentioned here only in the interest of being thorough. EPNG uses only certified technicians for the maintenance, service, repair and disposal of appliances and maintains the appropriate records for this requirement.

Federal Regulation Citation	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:

Section 14

Operational Plan to Mitigate Emissions

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

☐ **Title V Sources** (20.2.70 NMAC)**:** By checking this box and certifying this application the permittee certifies that it has developed an **Operational Plan to Mitigate Emissions During Startups, Shutdowns, and Emergencies** defining the measures to be taken to mitigate source emissions during startups, shutdowns, and emergencies as required by 20.2.70.300.D.5(f) and (g) NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.

☑ **NSR** (20.2.72 NMAC)**, PSD** (20.2.74 NMAC) **& Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has developed an **Operational Plan to Mitigate Source Emissions During Malfunction, Startup, or Shutdown** defining the measures to be taken to mitigate source emissions during malfunction, startup, or shutdown as required by 20.2.72.203.A.5 NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.

☑ **Title V** (20.2.70 NMAC)**, NSR** (20.2.72 NMAC)**, PSD** (20.2.74 NMAC) **& Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has established and implemented a Plan to Minimize Emissions During Routine or Predictable Startup, Shutdown, and Scheduled Maintenance through work practice standards and good air pollution control practices as required by 20.2.7.14.A and B NMAC. This plan shall be kept on site or at the nearest field office to be made available to the Department upon request. This plan should not be submitted with this application.

EPNG maintains the required planning and excess emission mitigation documents at Bluewater Compressor Station.

Section 15

Alternative Operating Scenarios

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

Alternative Operating Scenarios: Provide all information required by the department to define alternative operating scenarios. This includes process, material and product changes; facility emissions information; air pollution control equipment requirements; any applicable requirements; monitoring, recordkeeping, and reporting requirements; and compliance certification requirements. Please ensure applicable Tables in this application are clearly marked to show alternative operating scenario.

Construction Scenarios: When a permit is modified authorizing new construction to an existing facility, NMED includes a condition to clearly address which permit condition(s) (from the previous permit and the new permit) govern during the interval between the date of issuance of the modification permit and the completion of construction of the modification(s). There are many possible variables that need to be addressed such as: Is simultaneous operation of the old and new units permitted and, if so for example, for how long and under what restraints? In general, these types of requirements will be addressed in Section A100 of the permit, but additional requirements may be added elsewhere. Look in A100 of our NSR and/or TV permit template for sample language dealing with these requirements. Find these permit templates at: www.env.nm.gov/air-quality/permitting-section-procedures-and-guidance/. Compliance with standards must be maintained during construction, which should not usually be a problem unless simultaneous operation of old and new equipment is requested.

In this section, under the bolded title "Construction Scenarios", specify any information necessary to write these conditions, such as: conservative-realistic estimated time for completion of construction of the various units, whether simultaneous operation of old and new units is being requested (and, if so, modeled), whether the old units will be removed or decommissioned, any PSD ramifications, any temporary limits requested during phased construction, whether any increase in emissions is being requested as SSM emissions or will instead be handled as a separate Construction Scenario (with corresponding emission limits and conditions, etc.

The term "alternative operating scenario" is not defined by regulation. EPNG understands this term to apply to a source which may routinely operate with alternative fuels or processes in such a manner as to potentially affect emissions. Based on this understanding, this facility has no alternative operating scenarios.

Units at the facility may be shut down from time to time due to factors including but not limited to market demand, maintenance, malfunctions, and emergency shutdowns. Operating in alternative modes and temporary shutdowns are not alternative operating scenarios as EPNG understands the term.

Section 16

Air Dispersion Modeling

1) Minor Source Construction (20.2.72 NMAC) and Prevention of Significant Deterioration (PSD) (20.2.74 NMAC) ambient impact analysis (modeling): Provide an ambient impact analysis as required at 20.2.72.203.A(4) and/or 20.2.74.303 NMAC and as outlined in the Air Quality Bureau's Dispersion Modeling Guidelines found on the Planning Section's modeling website. If air dispersion modeling has been waived for one or more pollutants, attach the AQB Modeling Section modeling waiver approval documentation.
2) SSM Modeling: Applicants must conduct dispersion modeling for the total short term emissions during routine or predictable startup, shutdown, or maintenance (SSM) using realistic worst case scenarios following guidance from the Air Quality Bureau's dispersion modeling section. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions modeling requirements.
3) Title V (20.2.70 NMAC) ambient impact analysis: Title V applications must specify the construction permit and/or Title V Permit number(s) for which air quality dispersion modeling was last approved. Facilities that have only a Title V permit, such as landfills and air curtain incinerators, are subject to the same modeling required for preconstruction permits required by 20.2.72 and 20.2.74 NMAC.

What is the purpose of this application?	Enter an X for each purpose that applies
New PSD major source or PSD major modification (20.2.74 NMAC). See #1 above.	
New Minor Source or significant permit revision under 20.2.72 NMAC (20.2.72.219.D NMAC). See #1 above. **Note:** Neither modeling nor a modeling waiver is required for VOC emissions.	X
Reporting existing pollutants that were not previously reported.	
Reporting existing pollutants where the ambient impact is being addressed for the first time.	
Title V application (new, renewal, significant, or minor modification. 20.2.70 NMAC). See #3 above.	
Relocation (20.2.72.202.B.4 or 72.202.D.3.c NMAC)	
Minor Source Technical Permit Revision 20.2.72.219.B.1.d.vi NMAC for like-kind unit replacements.	
Other: i.e. SSM modeling. See #2 above.	
This application does not require modeling since this is a No Permit Required (NPR) application.	
This application does not require modeling since this is a Notice of Intent (NOI) application (20.2.73 NMAC).	
This application does not require modeling according to 20.2.70.7.E(11), 20.2.72.203.A(4), 20.2.74.303, 20.2.79.109.D NMAC and in accordance with the Air Quality Bureau's Modeling Guidelines.	

Check each box that applies:

☐ See attached, approved modeling **waiver for all** pollutants from the facility.
☐ See attached, approved modeling **waiver for some** pollutants from the facility.
☐ Attached in Universal Application Form 4 (UA4) is a **modeling report for all** pollutants from the facility.
☑ Attached in UA4 is a **modeling report for some** pollutants from the facility.
☐ No modeling is required.

AIR DISPERSION MODELING PROTOCOL

NSR Significant Revision Modeling Protocol

El Paso Natural Gas Company, L.L.C.
Bluewater Compressor Station

Prepared By:

Adam Erenstein – Manager of Consulting Services

TRINITY CONSULTANTS
9400 Holly Avenue NE
Building 3, Suite B
Albuquerque, NM 87122
(505) 266-6611

December 2024

Project 243201.0153

1. INTRODUCTION

1.1 Purpose of Modeling

Bluewater Compressor Station (Bluewater) is a natural gas compressor station that compresses natural gas and delivers the compressed gas to a pipeline for mainline transportation. This facility consists of three natural gas-fired turbines which provide power to the compressors. An auxiliary emergency generator engine is maintained at the facility to provide electric power in the event that service from the local utility is interrupted. Bluewater is located approximately 3.1 miles south of Thoreau, NM in McKinley County.

EPNG is submitting an application pursuant to 20.2.72.219.D.(1).(a) NMAC for a significant revision of NSR Permit No. 3004-M1. The purpose of this revision is to update to the total sulfur (TS) content of the fuel gas used for the permitted stationary turbines to reflect the TS limit in EPNG's FERC tariff. This modification will only affect SO_2 emissions at this facility. All other pollutant emission rates will remain as permitted. EPNG seeks to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS), New Mexico Ambient Air Quality Standards (NMAAQS), and PSD Increment standards as applicable for the SO_2 1-hour, 3-hour, 24-hour, and annual averaging periods.

1.2 Facility Description and Location

The approximate UTM coordinates of the facility are 751,769 meters East and 3,920,245 meters North with WGS84 datum at an elevation of approximately 7,160 feet above mean sea level.

2. PROPOSED MODELING

2.1 Model Input Options

The AERMOD dispersion model (version 23132) will be used for this analysis in lieu of the latest version 24142. This is justified as BREEZE has not updated the executable software to date. The model will be run in regulatory mode with all default options. Table 1 shows the emission sources and stack parameters for the facility. Please note that emissions and stack parameters may vary throughout the development of this application.

Table 1- Emission sources and stack parameters to be included in the air dispersion modeling.

Unit Number	SO_2 lb/hr	Height ft	Temp F	Velocity ft/s	Diameter ft
B-01	0.75	38	864	184.5	3.50
B-02	0.75	38	864	184.5	3.50
B-03	0.75	38	864	184.5	3.50
AUX-B-01	0.036	25	850	133.6	0.67

A downwash analysis using the latest version of BPIP will be conducted and incorporated into the modeling analysis to account for potential effluent downwash due to structures at the facility.

Table 2- Rectangular Building Downwash Structures

Building ID	*Height m	Length m	Width m
BLDG-1	0	16.7	28.2
BLDG-2	0	18.6	50.5
BLDG-3	0	14.7	19.5
BLDG-4	0	9.9	34.6
BLDG-5	0	9.4	21.1

*Building Heights will be determined and incorporated in the final air dispersion model

2.2 Receptor Grid Description and Elevation Data

The center point of the facility will be designated at 751,769 meters East and 3,920,245 meters North. This center point will serve as the center point for a variable density circular receptor grid. The facility fenceline will be modeled using 50 meter grid spacing. A 50 meter grid spacing will extend out to 800 meters in each direction from the facility center point for a very fine grid resolution. A 100 meter grid spacing will extend from 800 meters to 3,000 meters in each direction for a fine grid resolution. A 250 meter grid spacing will extend from 3,000 meters to 6,000 meters in each directions for a medium grid resolution. A 500 meter grid spacing will extend from 6,000 meters to 10,000 meters in each direction for a coarse grid resolution. A 1000 meter grid spacing will extend from 10,000 meters to 50,000 meters in each direction for a very coarse grid resolution. It is expected that the highest impacts from the proposed source will be at or near the facility property. The elevations of receptors and facility sources will be determined using the most recent NMED data currently available (1/3 arc-second NED).

2.3 Meteorological Data

The Gallup NWS dataset will be used for five meteorological years (2018-2022) as available on the NMED website.

2.4 Significance Analysis (SIL) and Cumulative Impact Analysis (CIA)

The modeled ground-level concentrations will be compared to the corresponding significant impact levels (SILs) to determine whether any modeled ground-level concentrations at any receptor locations are greater than the SIL (i.e., "significant" receptors). If the significance analysis reveals that modeled ground-level concentrations for a particular pollutant and averaging period are greater than the applicable SIL, a Cumulative Impact Analysis (CIA) will be performed at the significant receptors. The CIA will include impacts from the facility sources and/or background concentrations as applicable.

Based on the NMED Modeling Guidelines for SO_2 modeling, background concentrations or surrounding sources may be used. If necessary, the background concentration from the Bloomfield monitor (1ZB) will be used. Otherwise, the facility will be modeled with surrounding sources obtained from the NMED MergeMaster database.

2.5 PSD Increment Analysis

If the results of the ROI analysis for SO_2 indicate concentrations greater than significance levels, PSD increment analysis will be conducted for the appropriate averaging periods. If required, the PSD increment analysis will be conducted including all PSD increment consuming and expanding sources within 25 km of the facility, plus sources emitting over 1000 pounds per hour within 50 km of the facility. The surrounding source information will be obtained from NMED MergeMaster. The predicted maximum concentrations will be compared to the appropriate Class II PSD Increment Standard.

2.6 Class I Areas Analysis

The nearest Class I area is Petrified Forest National Park at 135.1 km from the facility. The Petrified Forest National Park is not within the 50 km inclusion zone of the facility; therefore, Class I area analysis is not required.

From: Mustafa, Sufi A., ENV <sufi.mustafa@env.nm.gov>
Sent: Wednesday, January 15, 2025 2:54 PM
To: Ryan Ahlberg
Subject: RE: [EXTERNAL] Modeling Protocol for El Paso Natural Gas Company L.L.C. Bluewater Compressor Station (NSR 3004-M1)

Ryan
I am sorry for a late reply.
This modeling protocol is acceptable.
Thank you.

Sufi A. Mustafa, Ph.D.
Manager Air Dispersion Modeling and Emission Inventory Section
New Mexico Environment Department's Air Quality Bureau
Office: (505) 629 6186
sufi.mustafa@state.nm.us
525 Camino de los Marquez
Suite 1
Santa Fe, New Mexico, 87505
https://www.env.nm.gov/air-quality/

"Innovation, Science, Collaboration, Compliance"

From: Ryan Ahlberg <Ryan.Ahlberg@trinityconsultants.com>
Sent: Wednesday, December 11, 2024 9:15 PM
To: Mustafa, Sufi A., ENV <sufi.mustafa@env.nm.gov>
Cc: Adam Erenstein <AErenstein@trinityconsultants.com>; Daniel Dolce <Daniel.Dolce@trinityconsultants.com>; Duarte, Ricardo (Richard) <Ricardo_Duarte@kindermorgan.com>
Subject: [EXTERNAL] Modeling Protocol for El Paso Natural Gas Company L.L.C. Bluewater Compressor Station (NSR 3004-M1)

Good Evening Sufi,
Please find attached the modeling protocol for El Paso Natural Gas Company L.L.C.'s Bluewater Compressor Station **(NSR 3004-M1)**. Modeling is being completed as a part of a significant revision to the permit.

Ryan Ahlberg
Associate Consultant

P 505.266.6611 M 815.341.2524
Email: mailto:ryan.ahlberg@trinityconsultants.com
9400 Holly Ave NE, Bldg 3, Ste B Albuquerque, NM 87122

Universal Application 4

Air Dispersion Modeling Report

Refer to and complete Section 16 of the Universal Application form (UA3) to assist your determination as to whether modeling is required. If, after filling out Section 16, you are still unsure if modeling is required, e-mail the completed Section 16 to the AQB Modeling Manager for assistance in making this determination. If modeling is required, a modeling protocol would be submitted and approved prior to an application submittal. The protocol should be emailed to the modeling manager. A protocol is recommended but optional for minor sources and is required for new PSD sources or PSD major modifications. Fill out and submit this portion of the Universal Application form (UA4), the "Air Dispersion Modeling Report", only if air dispersion modeling is required for this application submittal. This serves as your modeling report submittal and should contain all the information needed to describe the modeling. No other modeling report or modeling protocol should be submitted with this permit application.

16-A: Identification

1	Name of facility:	Bluewater Compressor Station
2	Name of company:	El Paso Natural Gas Company, L.L.C.
3	Current Permit number:	NSR Permit #3004-M1
4	Name of applicant's modeler:	Adam Erenstein
5	Phone number of modeler:	(505) 266-6611
6	E-mail of modeler:	aerenstein@trinityconsultants.com

16-B: Brief

1	Was a modeling protocol submitted and approved?	Yes☒	No☐
2	Why is the modeling being done?	Other (describe below)	
3	Describe the permit changes relevant to the modeling.		
	The total fuel sulfur content of the fuel gas used at this facility will be updated from 2.5 gr S/100scf to 5.0 gr S/100 scf. Therefore, this project will only affect the SO_2 emissions from the three (3) natural gas turbines at this facility (Units B-01, B-02, and B-03).		
4	What geodetic datum was used in the modeling?	WGS84	
5	How long will the facility be at this location?	Longer than 1 year	
6	Is the facility a major source with respect to Prevention of Significant Deterioration (PSD)?	Yes☒	No☐

7	Identify the Air Quality Control Region (AQCR) in which the facility is located	156	
8	List the PSD baseline dates for this region (minor or major, as appropriate).		
	NO2	Not Established	
	SO2	8/4/1978	
	PM10	8/4/1978	
	PM2.5	Not Established	
9	Provide the name and distance to Class I areas within 50 km of the facility (300 km for PSD permits).		
	N/A – No Class I areas within 50 km of the facility.		
10	Is the facility located in a non-attainment area? If so describe below	Yes☐	No☒
	N/A		
11	Describe any special modeling requirements, such as streamline permit requirements.		
	N/A		

16-C: Modeling History of Facility

Describe the modeling history of the facility, including the air permit numbers, the pollutants modeled, the National Ambient Air Quality Standards (NAAQS), New Mexico AAQS (NMAAQS), and PSD increments modeled. (Do not include modeling waivers).

Pollutant	Latest permit and modification number that modeled the pollutant facility-wide.	Date of Permit	Comments
CO	NSR 3004	5/12/2004	N/A
NO_2	NSR 3004	5/12/2004	N/A
SO_2	NSR 3004	5/12/2004	N/A
H_2S	NSR 3004-M1	12/18/2014	Modeling waiver was submitted
PM2.5	NSR 3004	5/12/2004	N/A
PM10	NSR 3004	5/12/2004	N/A
Lead	N/A	N/A	N/A
Ozone (PSD only)	N/A	N/A	N/A
NM Toxic Air Pollutants (20.2.72.402 NMAC)	N/A	N/A	N/A

16-D: Modeling performed for this application

For each pollutant, indicate the modeling performed and submitted with this application.
Choose the most complicated modeling applicable for that pollutant, i.e., culpability analysis assumes ROI and cumulative analysis were also performed.

Pollutant	ROI	Cumulative analysis	Culpability analysis	Waiver approved	Pollutant not emitted or not changed.
CO	☐	☐	☐	☐	☒

	NO_2	☐	☐	☐	☐	☒
	SO_2	☒	☒	☐	☐	☐
	H_2S	☐	☐	☐	☐	☒
	PM2.5	☐	☐	☐	☐	☒
	PM10	☐	☐	☐	☐	☒
	Lead	☐	☐	☐	☐	☒
	Ozone	☐	☐	☐	☐	☒
	State air toxic(s) (20.2.72.402 NMAC)	☐	☐	☐	☐	☒

16-E: New Mexico toxic air pollutants modeling

1 List any New Mexico toxic air pollutants (NMTAPs) from Tables A and B in 20.2.72.502 NMAC that are modeled for this application.
N/A

2 List any NMTAPs that are emitted but not modeled because stack height correction factor. Add additional rows to the table below, if required.

Pollutant	Emission Rate (pounds/hour)	Emission Rate Screening Level (pounds/hour)	Stack Height (meters)	Correction Factor	Emission Rate/ Correction Factor
N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A

16-F: Modeling options

1	Was the latest version of AERMOD used with regulatory default options? If not explain below.	Yes☒	No☐
	N/A		

16-G: Surrounding source modeling

1	Date of surrounding source retrieval	January 3, 2025

2 If the surrounding source inventory provided by the Air Quality Bureau was believed to be inaccurate, describe how the sources modeled differ from the inventory provided. If changes to the surrounding source inventory were made, use the table below to describe them. Add rows as needed.

AQB Source ID	Description of Corrections
2298E1	Incorrect location was more than 25 km from facility boundary. The coordinates were corrected to 764952mE and 3918227mN
2298E2	Incorrect location was more than 25 km from facility boundary. The coordinates were corrected to 764952mE and 3918227mN

16-H: Building and structure downwash

1	How many buildings are present at the facility?	5

2	How many above ground storage tanks are present at the facility?	4	
3	Was building downwash modeled for all buildings and tanks? If not explain why below.	Yes☐	No☒
	The tanks were excluded from the building downwash as they were not within the Good Engineering Practices (GEP) 5L area of influence		
4	Building comments	N/A	

16-I: Receptors and modeled property boundary

1	"Restricted Area" is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with a steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area. A Restricted Area is required in order to exclude receptors from the facility property. If the facility does not have a Restricted Area, then receptors shall be placed within the property boundaries of the facility. Describe the fence or other physical barrier at the facility that defines the restricted area.		
	The property is enclosed by a fence and receptors are placed starting along the fence line.		
2	Receptors must be placed along publicly accessible roads in the restricted area. Are there public roads passing through the restricted area?	Yes☐	No☒
3	Are restricted area boundary coordinates included in the modeling files?	Yes☐	No☒

4 Describe the receptor grids and their spacing. The table below may be used, adding rows as needed.

Grid Type	Shape	Spacing (m)	Start distance from restricted area or center of facility	End distance from restricted area or center of facility	Comments
Cartesian	Circular	50	0	800	
Cartesian	Circular	100	800	3000	
Cartesian	Circular	250	3000	6000	
Cartesian	Circular	500	6000	10000	
Cartesian	Circular	1000	10000	50000	

5	Describe receptor spacing along the fence line. A spacing of 50 meters will be used for receptors along the fence line of the property.
6	Describe the PSD Class I area receptors. N/A – No Class I area is within 50 km of the facility.

16-J: Modeling Scenarios

1	Identify, define, and describe all modeling scenarios. Examples of modeling scenarios include using different production rates, times of day, times of year, simultaneous or alternate operation of old and new equipment during transition periods, etc. Alternative operating scenarios should correspond to all parts of the Universal Application and should be fully described in Section 15 of the Universal Application (UA3).		
	N/A – This facility does not have any alternate operating scenarios and operates continuously (8760 hr/yr)		
2	Which scenario produces the highest concentrations? Why?		
	N/A		
3	Were emission factor sets used to limit emission rates or hours of operation? (This question pertains to the "SEASON", "MONTH", "HROFDY" and related factor sets, not to the factors used for calculating the maximum emission rate.)	Yes☐	No☒
4	If so, describe factors for each group of sources. List the sources in each group before the factor table for that group. (Modify or duplicate table as necessary. It's ok to put the table below section 16-K if it makes formatting easier.) Sources: N/A		

5

Hour of Day	Factor	Hour of Day	Factor								
1		13									
2		14									
3		15									
4		16									
5		17									
6		18									
7		19									
8		20									
9		21									
10		22									
11		23									
12		24									

	If hourly, variable emission rates were used that were not described above, describe them below.		
	N/A		
6	Were different emission rates used for short-term and annual modeling? If so describe below.	Yes☐	No☒

16-K: NO_2 Modeling

1	Which types of NO_2 modeling were used? Check all that apply. N/A	
	☐	ARM2
	☐	100% NO_X to NO_2 conversion
	☐	PVMRM

	☐	OLM
	☐	Other:
2	Describe the NO_2 modeling.	
	N/A	
3	Were default NO_2/NO_X ratios (0.5 minimum, 0.9 maximum or equilibrium) used? If not describe and justify the ratios used below.	Yes☐ No☐
	N/A	
4	Describe the design value used for each averaging period modeled. N/A	
	1-hour: Choose an item. Annual Choose an item.:	

16-L: Ozone Analysis

1	NMED has performed a generic analysis that demonstrates sources that are minor with respect to PSD do not cause or contribute to any violations of ozone NAAQS. The analysis follows. The basis of the ozone SIL is documented in *Guidance on Significant Impact Levels for Ozone and Fine Particles in the Prevention of Significant Deterioration Permitting Program*, EPA, April 17, 2018 and associated documents. NMED accepts this SIL basis and incorporates it into this permit record by reference. Complete documentation of the ozone concentration analysis using MERPS is included in the New Mexico Air Quality Bureau Air Dispersion Modeling Guidelines.				
2	The MERP values presented in Table 10 and Table 11 of the NM AQB Modeling Guidelines that produce the highest concentrations indicate that facilities emitting no more than 250 tons/year of NO_X and no more than 250 tons/year of VOCs will cause less formation of O_3 than the O_3 significance level. $$[O_3]_{8-hour} = \left(\frac{250 \frac{ton}{yr}}{340_{MERP_{NOX}}} + \frac{250 \frac{ton}{yr}}{4679_{MERP_{VOC}}} \right) \times 1.96\ \mu g/m^3$$ =1.546 µg/m³, which is below the significance level of 1.96 µg/m³. Sources that produce ozone concentrations below the ozone SIL do not cause or contribute to air contaminant levels exceeding the ozone NAAQS.				
3	Does the facility emit at least 250 tons per year of NO_X or at least 250 tons per year of VOCs? Sources that emit at least 250 tons per year of NO_X or at least 250 tons per year of VOCs are covered by the analysis above and require an individual analysis.			Yes☒	No☐
5	For new PSD Major Sources or PSD major modifications, if MERPs were used to account for ozone fill out the information below. If another method was used describe below.				
	NO_X (ton/yr)	$MERP_{NOX}$	VOCs (ton/yr)	$MERP_{VOC}$	$[O_3]_{8\text{-hour}}$
	N/A	N/A	N/A	N/A	N/A
	NO_x was not affected by the scope of this project and therefore, ozone analysis is not required for this facility.				

16-M: Particulate Matter Modeling

1	Select the pollutants for which plume depletion modeling was used.	
	☐	PM2.5
	☐	PM10

	☐	None
2	Describe the particle size distributions used. Include the source of information.	
	N/A	
3	Does the facility emit at least 40 tons per year of NO_X or at least 40 tons per year of SO_2? Sources that emit at least 40 tons per year of NO_X or at least 40 tons per year of SO_2 are considered to emit significant amounts of precursors and must account for secondary formation of PM2.5.	Yes☐ No☐
4	Was secondary PM modeled for PM2.5? N/A	Yes☐ No☐

5	If MERPs were used to account for secondary PM2.5 fill out the information below. If another method was used describe below.				
	Pollutant	NO_X	SO_2		$[PM2.5]_{24\text{-hour}}$
	$MERP_{annual}$	N/A	N/A		N/A
	$MERP_{24\text{-hour}}$	N/A	N/A		$[PM2.5]_{annual}$
	Emission rate (ton/yr)	N/A	N/A		N/A

16-N: Setback Distances

1	Portable sources or sources that need flexibility in their site configuration requires that setback distances be determined between the emission sources and the restricted area boundary (e.g. fence line) for both the initial location and future locations. Describe the setback distances for the initial location.
	N/A
2	Describe the requested, modeled, setback distances for future locations, if this permit is for a portable stationary source. Include a haul road in the relocation modeling.
	N/A

16-O: PSD Increment and Source IDs

1	The unit numbers in the Tables 2-A, 2-B, 2-C, 2-E, 2-F, and 2-I should match the ones in the modeling files. Do these match? If not, provide a cross-reference table between unit numbers if they do not match below.	Yes☐	No☒
	Unit Number in UA-2	Unit Number in Modeling Files	
	B-01	T-001	
	B-02	T-002	
	B-03	T-003	
2	The emission rates in the Tables 2-E and 2-F should match the ones in the modeling files. Do these match? If not, explain why below.	Yes☒	No☐
3	Have the minor NSR exempt sources or Title V Insignificant Activities" (Table 2-B) sources been modeled?	Yes☐	No☒

4	Which units consume increment for which pollutants?				
	Unit ID	NO_2	SO_2	PM10	PM2.5
	T-001	Consumer			
	T-002	Consumer			
	T-003	Consumer			
5	PSD increment description for sources. (for unusual cases, i.e., baseline unit expanded emissions after baseline date).	The units at this facility were all constructed after the baseline dates and are therefore full increment consumers.			
6	Are all the actual installation dates included in Table 2A of the application form, as required? This is necessary to verify the accuracy of PSD increment modeling. If not please explain how increment consumption status is determined for the missing installation dates below.	Yes☒	No☐		
	N/A				

16-P: Flare Modeling

1	For each flare or flaring scenario, complete the following			
	Flare ID (and scenario)	Average Molecular Weight	Gross Heat Release (cal/s)	Effective Flare Diameter (m)
	N/A	N/A	N/A	N/A

16-Q: Volume and Related Sources

1	Were the dimensions of volume sources different from standard dimensions in the Air Quality Bureau (AQB) Modeling Guidelines? If not please explain how increment consumption status is determined for the missing installation dates below.	Yes☐	No☒
	N/A		
2	Describe the determination of sigma-Y and sigma-Z for fugitive sources.		
	N/A		
3	Describe how the volume sources are related to unit numbers. Or say they are the same.		
	N/A		
4	Describe any open pits.		
	N/A		
5	Describe emission units included in each open pit.		
	N/A		

16-R: Background Concentrations

1	Were NMED provided background concentrations used? Identify the background station used below. If non-NMED provided background concentrations were used describe the data that was used.	Yes☒	No☐
	CO: N/A		
	NO_2: N/A		
	PM2.5: N/A		
	PM10: N/A		
	SO_2: Bloomfield(350450009)		
	Other:		
	Comments:		
2	Were background concentrations refined to monthly or hourly values? If so describe below.	Yes☐	No☒
	N/A		

16-S: Meteorological Data

1	Was NMED provided meteorological data used? If so select the station used. Gallup	Yes☒	No☐
2	If NMED provided meteorological data was not used describe the data set(s) used below. Discuss how missing data were handled, how stability class was determined, and how the data were processed.		
	N/A		

16-T: Terrain

1	Was complex terrain used in the modeling? If not, describe why below.	Yes☒	No☐
	N/A		
2	What was the source of the terrain data?		
	Terrain was incorporated into the modeling analysis through the use of AERMAP with the most recent 1/3 degree DEM data currently available from https://apps.nationalmap.gov/downloader/#/		

16-U: Modeling Files

1	Describe the modeling files:		
	File name (or folder and file name)	Pollutant(s)	Purpose (ROI/SIA, cumulative, culpability analysis, other)
	Meteorological data inputs – obtained from NMED web site.		
	BlueWater_SO2 SIL_v1.0_2025_0121	SO_2	SIA
	BlueWater_SO2 1hr NAAQS_v1.0_2025_0121	SO_2	Cumulative Analysis – NAAQS
	BlueWater_SO2 24hr PSD Increment_v1.0_2025_0121	SO_2	Cumulative Analysis – PSD Inc. Class II

16-V: PSD New or Major Modification Applications			
1	A new PSD major source or a major modification to an existing PSD major source requires additional analysis. Was preconstruction monitoring done (see 20.2.74.306 NMAC and PSD Preapplication Guidance on the AQB website)?	Yes☐	No☒
2	If not, did AQB approve an exemption from preconstruction monitoring?	Yes☐	No☒
3	Describe how preconstruction monitoring has been addressed or attach the approved preconstruction monitoring or monitoring exemption.		
	N/A		
4	Describe the additional impacts analysis required at 20.2.74.304 NMAC.		
	N/A		
5	If required, have ozone and secondary PM2.5 ambient impacts analyses been completed? If so describe below.	Yes☐	No☒
	N/A		

16-W: Modeling Results

1	If ambient standards are exceeded because of surrounding sources, a culpability analysis is required for the source to show that the contribution from this source is less than the significance levels for the specific pollutant. Was culpability analysis performed? If so describe below.	Yes☐	No☒
	N/A		
2	Identify the maximum concentrations from the modeling analysis. Rows may be modified, added and removed from the table below as necessary.		

Pollutant, Time Period and Standard	Modeled Facility Concentration (µg/m3)	Modeled Concentration with Surrounding Sources (µg/m3)	Secondary PM (µg/m3)	Background Concentration (µg/m3)	Cumulative Concentration (µg/m3)	Value of Standard (µg/m3)	Percent of Standard	Location		
								UTM E (m)	UTM N (m)	Elevation (ft)
SO_2 Annual SIL	0.47	-	-	-	0.47	1.0	47.3%	751894	3920241	7157.94
SO_2 24-hr SIL	5.24	-	-	-	5.24	5.0	Significant	751857	3920128	7170.67
SO_2 3-hr SIL	10.38	-	-	-	10.38	25.0	41.5%	751857	3920128	7170.67
SO_2 1- hr SIL	11.80	-	-	-	11.80	7.8	Significant	751857	3920128	7170.67
SO2 24-hr PSD Inc. Class II	4.37	4.37	-	-	4.37	91	4.8%	751894	3920241	7157.94
SO2 1-hr NAAQS	10.11	-	-	3.5	10.11	196.4	5.1%	751857	3920128	7170.67

16-X: Summary/conclusions	
1	A statement that modeling requirements have been satisfied and that the permit can be issued.
	EPNG has demonstrated that the proposed changes to NSR Permit #3004-M1 would neither cause nor contribute to an exceedance of the standards for SO_2.

Section 17

Compliance Test History

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

To show compliance with existing NSR permits conditions, you must submit a compliance test history. The table below provides an example.

To save paper and to standardize the application format, delete this sentence and the samples in the Compliance Test History Table, and begin your submittal for this attachment on this page.

Compliance Test History Table

Unit No.	Test Description	Test Date
B-01	Tested in accordance with EPA test methods for NO_x and CO	10/22/2009 10/08/2012 07/08/2019 07/15/2020 07/28/2021 09/19/2022 12/03/2024
B-02	Tested in accordance with EPA test methods for NO_x and CO	10/21/2009 10/08/2012 07/10/2019 08/04/2020 07/27/2021 09/20/2022 05/23/2023 12/06/2024
B-03	Tested in accordance with EPA test methods for NO_x and CO	10/20/2009 10/11/2012 07/09/2019 07/15/2020 07/27/2021 09/20/2022 05/23/2023 12/04/2024

Section 20

Other Relevant Information

Other relevant information. Use this attachment to clarify any part in the application that you think needs explaining. Reference the section, table, column, and/or field. Include any additional text, tables, calculations or clarifying information.

Additionally, the applicant may propose specific permit language for AQB consideration. In the case of a revision to an existing permit, the applicant should provide the old language and the new language in track changes format to highlight the proposed changes. If proposing language for a new facility or language for a new unit, submit the proposed operating condition(s), along with the associated monitoring, recordkeeping, and reporting conditions. In either case, please limit the proposed language to the affected portion of the permit.

EPNG would like to identify the North American Energy Standards Board (NAESB) Day as the basis for records tracking at Bluewater Compressor Station and other facilities.

The United States uses six different standardized time zones from east to west; the energy industry uses a seventh time zone developed by the NAESB. This Board serves as an industry platform for the development and promotion of industry practices and standards that lead to the seamless marketing of wholesale and retail natural gas and electricity. Since 2003, the NAESB Day has been recognized by its customers, the business community, participants, and federal and state regulatory entities. As such, a NAESB Day is a 24-hour period derived from a uniform time zone that occurs simultaneously nationwide and is the basis of EPNG's COMET data acquisition system "day" data. Unit information defined and stored according to the NAESB Day includes monitored gas flows or volumes, hours of operation, maintenance and repair activities, and routine operations. Data obtained from outside agencies (including test reports and summaries) or submitted pursuant to 20.2.7 NMAC reporting requirements is based on the "day" as defined by the local time zone.

Section 22: Certification

Company Name: El Paso Natural Gas Co. LLC

I, Ricardo Duarte, hereby certify that the information and data submitted in this application are true and as accurate as possible, to the best of my knowledge and professional expertise and experience.

Signed this 21 day of March, 2025, upon my oath or affirmation, before a notary of the State of New Mexico.

A. Ricardo Duarte
*Signature

March 21, 2025
Date

Ricardo Duarte
Printed Name

Sr. EHS Engineer
Title

Scribed and sworn before me on this 21 day of MARCH, 2025

My authorization as a notary of the State of NEW MEXICO expires on the 17 day of AUGUST, 2025.

Notary's Signature

3.21.25
Date

ROBERT GARCIA
Notary's Printed Name

STATE OF NEW MEXICO
NOTARY PUBLIC
Robert Garcia
Commission No. 1135241
August 17, 2025

*For Title V applications, the signature must be of the Responsible Official as defined in 20.2.70.7.AE NMAC.