

**PUBLIC NOTICE**  
For  
Air Quality Operating Permit  
for East Vacuum Liquid Recovery and CO2 Plant of ConocoPhillips - Midland Office

ConocoPhillips - Midland Office at 3300 North Avenue A, Bldg 6-1; Midland, TX 79705-5406 has submitted an air quality operating permit application to the New Mexico Environment Department (NMED) for an air quality operating permit for its East Vacuum Liquid Recovery and CO2 Plant. The owner of this plant is ConocoPhillips - Midland Office. The exact location of the facility is at latitude 32 deg, 47 min, 41.4848 sec and longitude -103 deg, 27 min, 28.7862 sec. To aid in locating this facility, the approximate location is 3 miles east of Buckeye in Lea County, New Mexico. This application file has been assigned an Operating Permit Number P092R2M2 and TEMPO Agency Interest ID No. 638.

Previously, the facility received an air quality construction permit and is in operation. The main purpose of the facility is to receive field gas, crude oil, and water; dehydrate the gas and send back into service for reinjection, and route the crude oil to a processing plant via pipeline.

This operating permit application is for a permit modification. Per 20.2.70.401.C.(4) NMAC, this permitting action involves the following:

- Addition of alternative operating scenario involving the use of a temporary flare during plant turnarounds when the main facility flare is shut down and the inlet to the facility is shut-in.
- Revision of n-Hexane and Total HAP emission rates.
- Addition of Total HAP emissions from Flare Unit 19.
- Update Table 104A to correctly note Units 16 and 17 as 4-stroke rich burn engines.
- Update the serial number listed in the permit for Unit 10 to 361764A.
- Update language in Table A202A to remove the requirement to inject all dehydrator still vent vapors. As with the VRU, when the compressors are down these vapors are flared. These emissions are accounted for in the gas analysis used to calculate the flare's PTE. Table 104 has been updated to reflect the reinjection or flaring of vapors. They are always routed to the inlet; however, the inlet gas is flared if the compressors are down.
- Removed Permit Condition A203.A, the requirement that all flared tank emissions be reported as excess under 20.2.7 NMAC. The flared emission rate has been permitted, whether from Flare 19 in normal operations or Flare 22 during plant turnarounds. The gas analysis used in the flare PTE calculations includes emissions from the VRU. When the compressors are down, the vapors cannot be injected and are instead flared.
- Remove the NOx emission limitations requirement in Condition A106C. Per 40 CFR 60.332(e), units that have commenced construction prior to October 3, 1982 are exempt. These units were constructed in 1980.
- Update Condition A209A to read "not subject to NSPS KKK or NSPS NNN."
- Changing the contents of Tank T-36 from produced water to fresh water and Tank T-12 from crude oil to produced water.

The emissions, as established in NSR Permit 0218-M7, and brought forward into this permit are as follows. Parentheses note changes in emissions from previous operating permit – P092R2. Emissions are expressed in tons per year (tpy). Nitrogen Oxides (NOx) at 155.5 tpy (-41.8); Carbon Monoxide (CO) at 204.5 tpy (-41.8); Volatile Organic Compounds (VOC) at 87.8 tpy (+9.0); Sulfur Dioxide (SO<sub>2</sub>) at 246.5 tpy (-1.2); Total Suspended Particulate (TSP) at 4.1 tpy (-1.6); Particulate Matter 10 microns or less (PM<sub>10</sub>) at 4.1 tpy (-0.7); and Particulate Matter 2.5 microns or less (PM<sub>2.5</sub>) at 4.1 tpy (-0.7); and Hydrogen Sulfide at 2.8 tpy (+0.1). The facility is a minor, < 100,000 tpy CO<sub>2</sub>e, source of greenhouse gas emissions.

The NMED has conducted a preliminary review of the information submitted with the permit application. This review included evaluation of the emission rates and applicable requirements to determine compliance.

The NMED has made a preliminary determination that this facility will comply with the requirements of Title 20, New Mexico Administrative Code (NMAC), Chapter 2, Parts 1, 7, 37, 38, 70, 71, 72, 73, 75, 77, and 82; 40 CFR 50; 40 CFR 60 Subparts A, Ka, GG, KKK, and NNN; 40 CFR 63 Subparts A, HH, and ZZZZ; 40 CFR 64 Compliance Assurance Monitoring; and the New Mexico Air Quality Control Act. Therefore, the preliminary intent of NMED is to issue the air quality operating permit on or before July 27, 2014.

Interested persons may obtain the draft operating permit, submit written comments, or request a public hearing on Operating Permit Number P092R2M2 by contacting Melinda Owens at the New Mexico Environment Department, Air Quality Bureau, 525 Camino de los Marquez Suite 1, Santa Fe, NM 87505-1816.

Written requests for public hearing must state the nature of the issues proposed to be raised in the hearing. Comments must be based on the requirements of the applicable state and federal air quality regulations and the Clean Air Act. Comments or hearing requests must be received within 30 days after the public notice is published.

The permit application, draft permit and relevant supporting materials are currently available for review at the Air Quality Bureau, 525 Camino de los Marquez Suite 1, Santa Fe, NM 87505-1816. The Department contact in Santa Fe is Melinda Owens at 505-476-4341.