

**STATE OF NEW MEXICO  
BEFORE THE SECRETARY OF THE ENVIRONMENT**

**NEW MEXICO ENVIRONMENT  
DEPARTMENT,**

**Complainant,**

v.

**No. AQB Case: LUC-29885-2201**

**TARGA NORTHERN DELAWARE LLC,**

**AQB 25-01**

**Respondent.**

**RESPONDENT TARGA NORTHERN DELAWARE LLC'S  
REQUEST FOR HEARING AND ANSWER TO COMPLIANCE ORDER**

Respondent, Targa Northern Delaware LLC (“Targa”), pursuant to 20.1.5.200 NMAC, submits the following Request for Hearing and Answer (“Request”) to the New Mexico Environment Department’s (“Department” or “NMED”) Administrative Compliance Order (“Compliance Order”), signed December 5, 2024, for alleged violations of the Air Quality Control Act, permit conditions, and regulations at Targa’s Red Hills Gas Processing Plant (“the Facility” or “Red Hills”), located in Lea County, New Mexico.

**REQUEST FOR HEARING**

Targa, pursuant to NMSA 1978, § 74-2-12(C) (2006) and 20.1.5.200.A NMAC, hereby requests a hearing on the Compliance Order. A copy of the Compliance Order (without attachments) is attached to this Request as Exhibit A.

## **BACKGROUND**

Targa offers the following background to provide important context for the Compliance Order and this Request for Hearing. Targa has a long history of responsibly operating oil and gas assets in the State of New Mexico. The current case presents unique circumstances that are not recognized in the Compliance Order, including the distinct nature of this Facility, the fact that the vast majority of the violations occurred prior to Targa acquiring the Facility, and Targa's extraordinary efforts to bring the Facility into full compliance as quickly as possible following acquisition. Violations alleged in the Compliance Order that occurred prior to Targa's acquisition of the Facility include the following:

- Violation 1 relates to excess emissions from the flares at the Facility, 98% of which occurred prior to Targa's ownership.
- Violation 2 relates to excess emissions from thermal oxidizers and certain flaring events at the Facility. 71% of the thermal oxidizer emissions occurred prior to Targa's ownership of the Facility.
- Violation 3 relates to late reporting of excess emissions and constitutes 71% of the proposed penalty. 99% of the violation days cited by NMED occurred under the previous owner.

Since acquiring the Facility, Targa has expended considerable time and resources, in coordination with NMED, to reduce excess emissions and enhance environmental compliance at the Facility. From the first quarter of 2024 through the fourth quarter of 2024, Targa reduced excess emissions at the Facility by 87%.<sup>1</sup> Upon approval of the Significant Permit Revision

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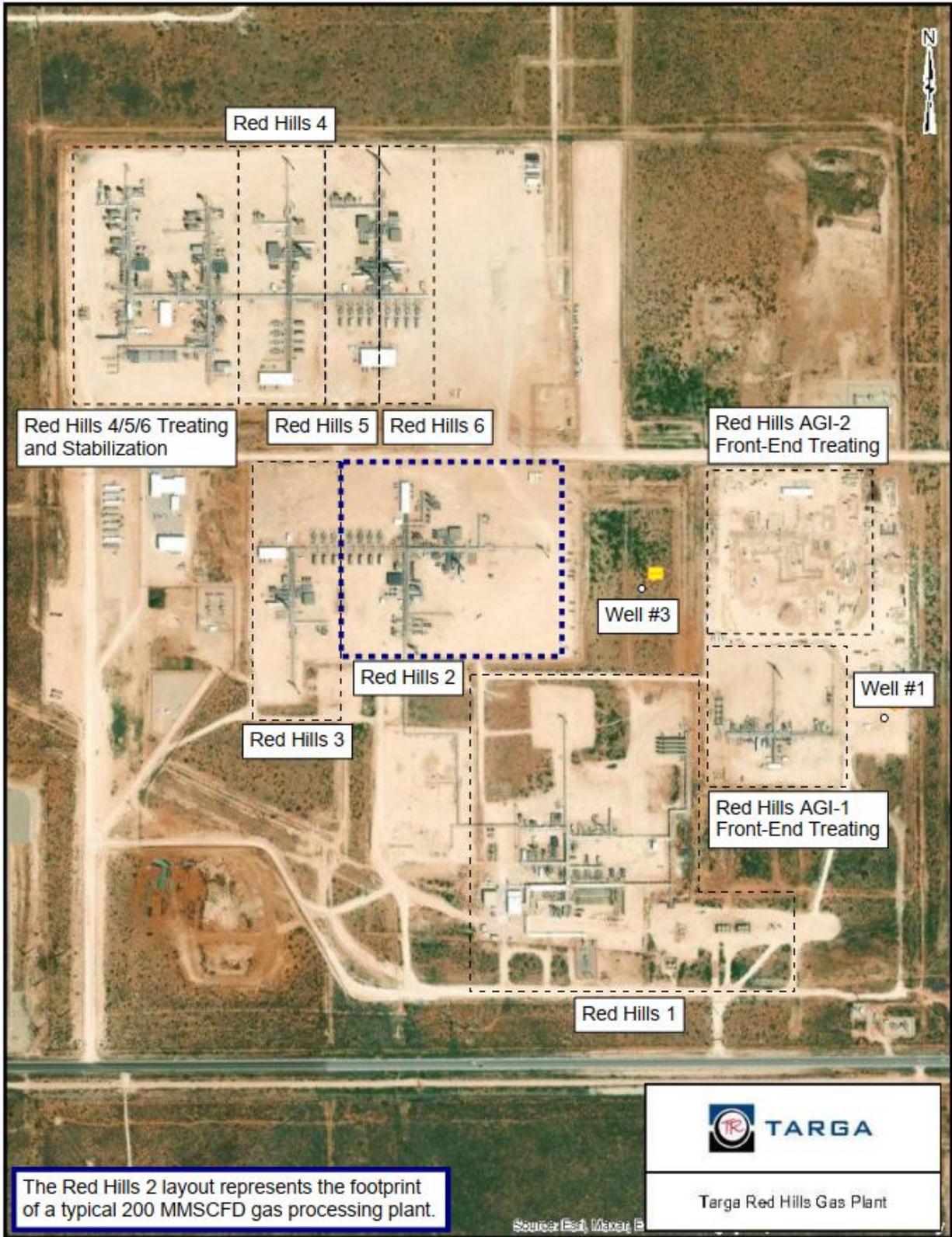
<sup>1</sup> Based on Targa's Jan. 2, 2025 review of Excess Emission Reports from January 2024 to December 2024 contained in NMED's Secure Extranet Portal.

referenced in paragraph D, excess emissions occurring during routine operations are expected to be negligible.

**A. Targa's Acquisition of the Facility**

On July 29, 2022, Targa acquired the Facility from Lucid Energy Delaware. The Facility was commissioned in 2013 by Agave Energy with construction of Red Hills Train 1. Lucid Energy acquired Agave Energy in 2016 and constructed Red Hills Trains 2 through 5 and the front-end treater and first acid gas injection facility. Targa completed the construction of Red Hills Train 6 after acquisition of the Facility. Targa also commissioned a second front-end treater and a second acid gas injection facility in January 2024. Since it consists of six processing trains, plus two front-end treaters and two acid gas injection facilities, the Facility has a footprint that is unlike other gas processing plants in terms of size and complexity that are overseen by NMED. In short, the Facility essentially consists of six gas plants at one location.

The Facility serves as a key regional resource for the gathering and processing of natural gas. An image of the Facility is set forth below.



## **B. Targa Conducted a Voluntary, Post-Acquisition Audit**

In accordance with Targa's post-acquisition environmental compliance practices, on October 6, 2022, Targa submitted a proposal to NMED to undertake a voluntary, comprehensive environmental post-acquisition audit of all assets that Targa acquired from Lucid Energy, including the Facility. Targa conducted the audit in compliance with the NMED Air Quality Bureau's ("AQB" or "Bureau") Voluntary Disclosure Policy and in coordination with the AQB. In a "Memorandum" dated October 26, 2022, the AQB conditionally approved for penalty mitigation Targa's "Environmental Audit TAR-Multi-2201" covering thirty-four (34) acquired facilities, including the Facility. Targa hired third-party environmental experts from Trinity Consultants to conduct the audit with Targa oversight. Targa submitted monthly audit reports to the AQB and submitted the final report on February 28, 2024. The final report is attached as Exhibit B (without attachments).

As a result of the audit, Targa voluntarily disclosed numerous compliance issues to the AQB, the vast majority of which related to Lucid Energy's historic permitting, recordkeeping, and reporting practices. Except for certain audit findings requiring additional permit revisions, all audit findings are closed and corrective actions completed. In sum, Targa voluntarily expended over \$1 million and devoted significant internal resources to identify and correct legacy environmental issues. These voluntary efforts directly contradict allegations by NMED that Targa has been negligent or has demonstrated a lack of cooperation.

## **C. Targa Is Making Significant Progress to Reduce Excess Emissions**

While undertaking the voluntary environmental audit, Targa concurrently worked with NMED to address excess emissions at the Facility, including correcting Lucid Energy's excess emissions reports, addressing excess emissions identified in the July 18, 2023 Notice of Violation

(“NOV”) and the April 26, 2024 Post Inspection Notification (“PIN”), and completing the Root Cause Analysis (“RCA”) requested by the NMED on December 21, 2023. In response to NMED’s December 21, 2023, request for the RCA, Targa hired third-party engineering experts from Think Reliability to complete the RCA. Targa and NMED discussed format and content of the requested RCA over the phone or via email on approximately ten separate occasions between February and April 2024. Believing its submission complied with the NMED’s request based on its communications with NMED, on April 19, 2024, Targa submitted the “Response to Root Cause Analysis and Corrective Action Request” and requested a meeting to discuss the final report with NMED. NMED denied Targa’s request to meet with the third-party engineer hired by NMED to review Targa’s RCA.

On July 12, 2024, NMED notified Targa that the RCA report was deficient. Along with this notification, NMED issued a second NOV and requested that Targa resubmit the RCA. On August 9, 2024, Targa submitted its “Revised Root Cause Analysis and Corrective Action Report,” which included all the information in the originally submitted RCA plus detailed answers to NMED’s follow-up questions. The final, resubmitted report included 54 root cause analyses evaluating 122 excess emissions events along with over 100 engineering or operational corrective actions. Of the 100 corrective actions, 97 were closed as of December 31, 2024, with the remaining three scheduled for completion in early 2025. The approximate cost of corrective actions totals over \$13 million. This total does not include the \$130 million cost of the already commissioned Red Hills AGI 2 that provides redundancy and reduces emissions at the Facility. As stated above, these corrective actions have already reduced excess emission at the Facility by approximately 87% from the first quarter of 2024 through the fourth quarter of 2024.

#### **D. Targa Is Properly Re-Permitting the Facility**

In addition to Targa's extensive efforts to complete its voluntary compliance audit, complete corrective actions, and conduct the NMED-required RCAs for the acquired assets, Targa has been working with NMED to re-permit the Facility, as follows:

- On January 18, 2024, Targa held a prevention of significant deterioration ("PSD") pre-application meeting with NMED to correct all the remaining items found during the voluntary environmental audit. NMED advised Targa to withhold filing Targa's proposed PSD application until all the below-referenced technical and significant revisions have been approved by NMED.
- Within thirty days following completion of the voluntary compliance audit, Targa submitted a significant permit revision (the "Significant Permit Revision") application to NMED on March 20, 2024, that included several corrective actions from the voluntary environmental audit and an additional compliance action from the RCA. After Targa timely responded to several requests for additional information from NMED, NMED deemed the Significant Permit Revision application administratively complete on December 27, 2024—282 days after Targa submitted the application.
- Targa has submitted several technical revision applications (July 18, 2024, July 30, 2024, August 1, 2024, and August 13, 2024) that were approved by NMED on August 16, 2024, September 4, 2024, and October 4, 2024, in connection with projects identified in the RCAs.

The revised permits are necessary to more accurately reflect present and future operations at the Facility.

**E. Targa Has Made Good Faith and Expeditious Efforts to Bring the Facility into Full Compliance**

Despite Targa’s good faith efforts to cooperate with the AQB on achieving environmental compliance at the Facility, NMED was unwilling to meet with Targa to discuss the enforcement action prior to issuing the Compliance Order. In addition, and notwithstanding Targa’s extensive efforts and the unique nature of the Facility (as outlined above), NMED has improperly issued a blanket denial of all affirmative defenses submitted by Targa for excess emissions that occurred after Targa acquired the Facility because the Facility allegedly “has a pattern of inadequate design, operation, or maintenance and that improper operation of the Facility exists [.]” NMED’s position is contrary to law, inaccurate, and arbitrary and capricious.

Targa remains committed to being a responsible operator of midstream assets in New Mexico. To that end, Targa will continue to act in good faith with the intention of bringing the Facility into full compliance with applicable regulations in cooperation with NMED. Nonetheless, there are numerous legal, factual, and equitable flaws in the Compliance Order, and Targa is prepared to present its case at a hearing, if necessary. Targa’s answer to the Compliance Order follows.

**ANSWER**

Targa, pursuant to 20.1.5.200.A(2) NMAC, submits the following answers to the factual assertions in the Compliance Order. Except where Targa expressly admits a factual assertion in this Request, Targa denies every allegation of the Compliance Order.

**FACTUAL BACKGROUND**

1. Targa admits the factual assertions in Paragraph 1. Targa further affirmatively states that it acquired the Facility on July 29, 2022 from Lucid Energy, after the majority of the factual assertions underlying the Compliance Order had allegedly occurred.

2. Targa admits the factual assertions in Paragraph 2.<sup>2</sup> Targa further affirmatively states that the preliminary findings of the portion of the audit related to the Red Hills Facility revealed that the permitting for the Facility requires updates to more accurately reflect present and future operations at the Facility. Targa has submitted various permit applications to the Department to re-permit the Facility and, as outlined in paragraph D above, will submit a PSD application after all current applications have been approved.

3. In response to the first sentence in Paragraph 3, Targa has no knowledge to admit or deny that an AQB analyst reviewed Excess Emission Reports (“EERs”) on July 8, 2022. In response to the second sentence in Paragraph 3, Targa admits that Lucid Energy submitted EERs for events that occurred between November 11, 2018 and November 30, 2021, prior to the date that Targa acquired the Facility. Targa admits the third sentence in Paragraph 3. Targa is without knowledge to admit or deny that the PIN contained in NMED Attachment 7 became the basis for Enforcement case number LUC-29885-2201. Unless specifically admitted, the remaining allegations in Paragraph 3 are denied.

4. Targa is without sufficient knowledge to confirm or deny that an AQB analyst and Lucid personnel met by phone on July 12, 2022.

5. Targa admits that a Tolling Agreement related to the Facility is included as NMED Attachment 8. That Tolling Agreement was signed on July 28, 2022 and August 26, 2022. The terms of the Tolling Agreement (NMED Attachment 8) and PIN (Attachment 9) speak for themselves, and no response is necessary. To the extent a response is necessary, Targa denies any allegations inconsistent with the plain language of the Tolling Agreement and PIN. Targa has no

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<sup>2</sup> Targa notes that NMED Attachment 6 is incorrectly labeled as “NMED Attachment 3.”

knowledge of the factual assertions in the third sentence of Paragraph 5. Unless specifically admitted, the remaining allegations in Paragraph 5 are denied.

6. Targa admits the factual assertions in Paragraph 6.

7. Targa admits that Targa personnel submitted a revised spreadsheet with corrections to EERs along with the email identified as NMED Attachment 11. The terms of the revised spreadsheet and email (Attachment 11) speak for themselves, and no response is necessary. To the extent a response is necessary, Targa denies any allegations inconsistent with the plain language of the revised spreadsheet and email. In response to the second sentence of Paragraph 7, Targa admits that one of its employees met with an AQB analyst by phone to discuss the revised calculations and continued to correspond with the AQB analyst and the Compliance & Enforcement Chief (“Section Chief”) until all their questions were answered. Targa has no knowledge as to whether that AQB analyst still had remaining questions. Unless specifically admitted, the remaining allegations in Paragraph 7 are denied.

8. Targa admits the factual assertions in Paragraph 8.

9. Targa admits the factual assertions in Paragraph 9.

10. Targa admits the factual assertions in Paragraph 10. The spreadsheets referred to in Paragraph 10 speak for themselves and Targa denies any allegations inconsistent with the plain language of the spreadsheets. Targa further affirmatively states that the February 27, 2023 meeting referred to in Paragraph 10 included discussions about Targa’s voluntary, comprehensive environmental audit of every acquired Lucid Energy facility, including Red Hills. The purpose of the audit was to identify, report to NMED, and correct legacy environmental issues at the newly acquired facilities, including the newly acquired Red Hills Facility. The final Environmental Audit TAR-Multi-2201 report was submitted to the Department on February 28, 2024. The Compliance

Order does not directly refer to Targa’s voluntary, comprehensive post-acquisition environmental audit, but the audit is described in NMED Attachment 13 at page 5, section 2.2.2. As explained therein, “the audit overlaps with [the Compliance Order], as the corrective actions for these alleged violations align with the corrective actions in the audit – a needed permit revision for Red Hills Gas Processing Plant.” Except for audit findings requiring the permit revision, the audit findings have been addressed.

11. Targa admits that NMED Attachment 14 was signed on April 19, 2023. The terms of the First Amended Tolling Agreement (Attachment 14) speak for themselves, and no response is necessary. To the extent a response is necessary, Targa denies any allegations inconsistent with the plain language of the First Amended Tolling Agreement.

12. Targa admits the factual assertions in Paragraph 12.

13. Targa admits the factual assertions in Paragraph 13.

14. Targa admits the factual assertions in Paragraph 14.

15. Targa admits the factual assertions in Paragraph 15.

16. Targa admits the factual assertions in Paragraph 16.

17. Targa admits the factual assertions in Paragraph 17.

18. Targa admits the factual assertions in Paragraph 18. Targa further affirmatively states that the RCA submitted on April 19, 2024 contained the information required by 20.2.7.114 NMAC.

19. Targa admits that the AQB compiled the list that is included in the Compliance Order as NMED Attachment 22. Targa further admits that the Department purports to rely on NMED Attachment 22 for some allegations in violation #2 in LUC-29885-2201 and for some

allegations in violation #3. Unless specifically admitted, the remaining allegations in Paragraph 19 are denied.

20. Targa admits the factual assertions in Paragraph 20.

21. Targa admits that it signed the Second Amended Tolling Agreement on May 14, 2024. The terms of the First Second Amended Tolling Agreement (Attachment 24) speak for themselves, and no response is necessary. To the extent a response is necessary, Targa denies any allegations inconsistent with the plain language of the Second Amended Tolling Agreement.

22. Targa admits that the Department sent Targa a letter dated July 12, 2024 (NMED Attachment 25) but denies that its RCA was legally deficient. Targa further denies that the allegedly deficient RCA constitutes a separate violation or that the Department is authorized to assess civil penalties for an allegedly deficient RCA.

23. Targa admits that it submitted a revised RCA to the Department but denies that NMED Attachment 26 is a complete copy of the revised RCA. The full RCA is 1,515 pages long and contains detailed analysis of the alleged violations and corrective actions.

## **ALLEGED VIOLATIONS – LUC – 29885-2201**

### **Alleged Violation 1**

**Failure to operate the Red Hills Gas Processing Plant's flare units 1-EP-2, 2.5-EP-5, 2-EP-2a and 4-EP-2a within allowable emission limits for four regulated pollutants pursuant to NSR Permits 4310 M3-M5R1, Specific Conditions A106.A and A107.A.**

### **Violation 1 Background**

24. Targa admits that the emission limits in tons per year are governed by the applicable permits and further admits that NMED Attachment 27 accurately summarizes the limits.

### **Violation 1 Summary**

25. Targa admits that the Department has alleged that Lucid did not submit adequate records for the emissions of the four flares in alleged Violation 1, admits that Targa certified data to the Department, and admits that the Department has calculated an amount that it alleges constitutes excess emissions for Violation 1. The data referenced in Paragraph 25 shows that 98% of the excess emissions occurred prior to Targa's acquisition of the Facility. Unless specifically admitted, the remaining allegations in Paragraph 25 are denied.

26. Targa assumes that the phrase "The table from Targa" refers to the data tables submitted by Targa on March 3, 2023 that are referenced in Paragraph 25. Based on that assumption, Targa admits that the Department purports to rely on the referenced data for its claims. Unless specifically admitted, the remaining allegations in Paragraph 26 are denied.

### **Violation 2**

**Failure to operate the Red Hills Gas Processing Plant within allowable emission limits for four regulated pollutants to NSR Permits 4310 M3-M5R1, Specific Conditions A106.A and A 107.A.**

#### **Violation 2 Background**

27. Targa admits that it submitted spreadsheets with emissions calculations for the three identified thermal oxidizers but otherwise denies Paragraph 27.

28. In response to the first sentence of Paragraph 28, Targa admits that the pounds-per-hour emission limits are governed by the applicable permits. The second sentence of Paragraph 28 states a legal conclusion to which no response is necessary. Unless specifically admitted, the remaining allegations in Paragraph 28 are denied.

### **Violation 2 Summary**

29. Targa admits the allegations in the first sentence of Paragraph 29. Targa further admits that it submitted data spreadsheets correcting Lucid Energy's calculations of excess emissions from the thermal oxidizers and certain flaring events at the Facility to the Department on March 3, 2023. The terms of the March 3, 2023 spreadsheets speak for themselves, and no response is necessary. To the extent a response is necessary, Targa denies any allegations inconsistent with the plain language of the revised spreadsheet. Unless specifically admitted, the remaining allegations in Paragraph 29 are denied.

30. Targa admits the allegations in the first sentence of Paragraph 30. The EERs referred to in Paragraph 30 speak for themselves, and no response is necessary. To the extent a response is necessary, Targa denies any allegations inconsistent with the plain language of the EERs.

31. Targa admits the first sentence of Paragraph 31. The remainder of Paragraph 31 states a legal position to which no response is required. To the extent that a response is required, Targa denies the remaining allegations of Paragraph 31. Targa disagrees with the Department's position on the Affirmative Defense Determinations ("ADD") and states that the efficacy of the ADDs is a matter which will be determined in this proceeding.

### **Violation 3**

**Failure to submit excess emissions reports by the appropriate time frames  
is in violation of 20.2.7.110.A NMAC.**

### **Violation 3 Background**

32. 20.2.7.110.A NMAC speaks for itself, and no response is necessary to Paragraph 32.

### **Violation 3 Summary**

33. Targa admits the factual assertions in Paragraph 33.

34. Targa is without sufficient knowledge to admit or deny the first two sentences of Paragraph 34. Targa denies the third and fourth sentences of Paragraph 34 and affirmatively states that it has identified errors in NMED Attachment 32. Moreover, the Department fails to acknowledge that in many instances, the EERs that were submitted by Lucid constituted both initial and final reports. Unless specifically admitted, the remaining allegations in Paragraph 34 are denied.

35. In response to the first sentence of Paragraph 35, Targa admits that a Bureau enforcement specialist purported to identify EERs submitted by Targa that did not meet the timelines in 20.2.7.110 NMAC. Targa admits the second and fifth sentences of Paragraph 35. The numbers contained in the third and fourth sentences of Paragraph 35 are transposed. The Department has alleged that initial EERs were submitted a total of 206 days (not 111) late, and final EERs were submitted 111 days (not 206) late. Unless specifically admitted, the remaining allegations in Paragraph 35 are denied.

### **Violation 4**

**Failure to adequately meet the requirements of a Root Cause Analysis, and failure to provide an analysis describing the root cause of the excess emissions, including the identification of available corrective actions alternatives, the estimated cost of each alternative, and a thorough analysis of probable effectiveness of each alternative, in violation of NMAC 20.2.7.114.**

### **Violation 4 Background**

36. 20.2.7.110.A NMAC speaks for itself, and no response is necessary to Paragraph 36.

#### **Violation 4 Summary**

37. Targa admits the factual assertions in Paragraph 37.

38. Targa admits the factual assertions in Paragraph 38.

39. Targa admits the factual assertions in Paragraph 39.

40. Targa is without sufficient information to admit or deny the allegations in the first sentence of Paragraph 40. Targa admits that the Department sent a letter on July 12, 2024. The terms of the July 12, 2024 letter speak for themselves, and no response is necessary. To the extent a response is necessary, Targa denies any allegations inconsistent with the plain language of the letter. Targa further denies that its initial RCA was deficient or that the Department has stated with reasonable specificity the nature of the violation. Unless specifically admitted, the remaining allegations in Paragraph 29 are denied.

41. Targa admits the factual assertions in Paragraph 41.

#### **EFFECTIVE DATE**

42. Paragraph 42 states a legal conclusion to which no response is required. To the extent a response is required, Targa states that the Effective Date in Paragraph 42 is inconsistent with the Air Quality Control Act, § 74-2-12(C), which states that “[a]n order issued pursuant to Subsection A of this section shall become final unless, no later than thirty days after the order is served, the person named therein submits a written request to the secretary . . . for a public hearing.”

#### **COMPLIANCE ORDER**

43. Paragraph 43 states a legal conclusion to which no response is required. To the extent a response is required, Targa denies that the relief sought in the Compliance Order is authorized by Section 74-2-12(A).

44. Paragraph 43 states a legal conclusion to which no response is required. To the extent a response is required, Targa denies the allegations in Paragraph 43. Targa further affirmatively states that to the extent the Secretary was involved in the consideration or development of the Compliance Order, the New Mexico Constitution forbids the Secretary from also acting as the impartial decision-maker on the Compliance Order.

45. Targa is without sufficient knowledge to admit or deny the allegations in Paragraph 45. To the extent the Secretary was involved in the consideration or development of the Compliance Order, the New Mexico Constitution forbids the Secretary from also acting as the impartial decision-maker on the Compliance Order.

46. Paragraph 46 contains a legal conclusion to which no response is required. Targa further affirmatively states that Paragraph 46 is inconsistent with NMSA 1978, § 74-2-12(C).

### **Order 1**

#### **Cease and desist excess emissions at the Red Hills Gas Processing Plant.**

47. Paragraph 47 states a request for relief to which no response is necessary. As stated above, Targa has submitted various permit applications and completed numerous engineering and operational corrective actions to reduce excess emissions at the Facility.

48. Paragraph 48 states a legal conclusion to which no response is necessary. To the extent that a response is necessary, Targa denies the assertions in Paragraph 48 and states that the Department lacks statutory authority to take the action asserted in Paragraph 48.

## Order 2

### Complete 16 projects, initiatives, and improvements as outlined in the August 9, 2024 letter to AQB.

49. Paragraph 49 states a request for relief to which no response is necessary. Targa further affirmatively states that the 16 projects referenced in Paragraph 49 were identified by Targa's RCA. As Targa explained:

In total, Targa has approved 16 distinct projects, initiatives, and improvements to reduce both the number of excess emission events and total emissions at the Red Hills Gas Processing Plant. Within the 12-month period between July 1, 2023 and June 30, 2024, Targa identified 550 excess emission events (88% of adjusted total events) would be directly addressed by the corrective actions outlined below. Estimated capital cost totals \$13,000,000 after excluding the construction cost for Red Hills AGI-2. Estimated recurring operating cost totals \$450,000 per year.

NMED Attachment 26 at pg. 3. Moreover, the specific injunctive relief identified in Paragraph 49 is not authorized by the Air Quality Control Act.

50. Paragraph 50 states a request for relief to which no response is necessary. To the extent a response is required, Targa states that the specific injunctive relief identified in Paragraph 50 is not authorized by the Air Quality Control Act.

51. Paragraph 51 states a request for relief to which no response is necessary. To the extent a response is required, Targa states that the specific injunctive relief identified in Paragraph 51 is not authorized by the Air Quality Control Act.

52. Paragraph 52 states a request for relief to which no response is necessary. To the extent a response is required, Targa states that the specific injunctive relief identified in Paragraph 52 is not authorized by the Air Quality Control Act.

### **CIVIL PENALTY**

53. Paragraph 53 states a legal conclusion to which no response is required. To the extent a response is required, Targa denies that the penalties sought in the Compliance Order are authorized by Section 74-2-12(A).

54. Paragraph 54 states a legal conclusion to which no response is required. To the extent a response is required, Targa denies that the penalties sought in the Compliance Order are authorized by Section 74-2-12(A).

55. Paragraph 55 states a legal conclusion to which no response is required. To the extent a response is required, Targa denies that the penalties sought in the Compliance Order are authorized by Section 74-2-12(A), denies that the assessed penalty is reasonable, appropriate, or consistent with the Air Quality Control Act, the New Mexico Administrative Code, and/or the Civil Penalty Policy and denies that the Civil Penalty Policy is applicable to this proceeding or binding on the Secretary. Targa further states that the NMED-AQB Civil Penalty Policy is not a regulation or statute and lacks the force of law.

### **ADMINISTRATIVE COMPLIANCE COSTS**

56. Paragraph 56 states a legal conclusion to which no response is required. To the extent a response is required, Targa denies that the obligation specified in Paragraph 55 is consistent with the relief authorized under Section 74-2-12 or Section 74-2-12.1(B) and asserts that the relief is beyond the scope of the Secretary's authority.

### **NOTICE OF OPPORTUNITY TO ANSWER AND REQUEST A HEARING**

57. Paragraph 57 states a legal conclusion to which no response is required.

58. Paragraph 58 states a legal conclusion to which no response is required.

59. Paragraph 59 states a legal conclusion to which no response is required.

## **SETTLEMENT CONFERENCE**

60. Paragraph 60 states a legal conclusion or request for relief to which no response is required.

## **TERMINATION**

61. Paragraph 61 states a legal conclusion to which no response is required.

## **DEFENSES**

1. The civil penalty claim is barred for each of the alleged violations for which Targa has asserted valid affirmative defenses under 20.7.2 NMAC.

2. To the extent the orders and civil penalties assessed in the Compliance Order are for excess emissions events discovered and/or reported to the AQB one year or more prior to August 26, 2022, the execution date of the tolling agreement, they are barred by the 1-year statute of limitations for administrative compliance orders under Section 74-2-12(A)(1).

3. To the extent that any alleged violations in the Compliance Order were not included in an inspection report issued by the AQB, or are based on occurrences that were not specified in the inspection report, such claims are impermissible in this action because they do not comply with NMSA 1978, Section 74-2-5.1(A) (1992), which requires the AQB to reduce to writing the results of any investigation when an enforcement action is contemplated and furnish a copy to the owner of the premises before an enforcement action is filed.

4. The orders and civil penalties for any other compliance issues known by, or that should have been known by, the AQB one year prior to August 26, 2022, the execution date of the are barred by the 1-year statute of limitations for administrative compliance orders under Section 74-2-12(A)(1).

5. The civil penalties assessed in the Compliance Order are not reasonable, appropriate, or consistent with the Air Quality Control Act and/or the New Mexico Administrative Code and are not consistent with AQB enforcement precedent. The penalties are also inconsistent with the AQB's Civil Penalty Policy, including with respect to calculation of alternative assessment for excess emissions violations and/or calculation of the determination of the gravity factors, number of claims, and adjustment factors.

6. The civil penalties assessed in the Compliance Order do not "take into account the seriousness of the violation, any good-faith efforts to comply with the applicable requirements and other relevant factors" as required by the Air Quality Control Act, Section 74-2-12(G).

7. The penalties assessed in the Compliance Order are not proportional to the violations alleged, and therefore, violate due process under the Fourteenth Amendment of the United States Constitution and Article II, Section 18 of the New Mexico Constitution.

8. The provisions of the Air Quality Control Act, § 74-2-12(A)(I), that purport to authorize the Secretary to issue a compliance order assessing a civil penalty for past and current violations violates the Separation of Powers provision of the New Mexico Constitution, Article III, Section 1. The authority to assess sanctions for violations of laws and regulations is reserved under the New Mexico Constitution to the judicial branch of government.

9. The penalties assessed in the Compliance Order of more than \$15,000 per day for each flaring event is barred by and inconsistent with the Air Quality Control Act, Section 74-2-12(A).

10. The orders and civil penalties assessed in the Compliance Order for alleged Violation 4, "failure to adequately meet requirements of a Root Cause Analysis..." violates due process under the Fourteenth Amendment of the United States Constitution and Article II, Section

18 of the New Mexico Constitution. The regulation allegedly violated (20.2.7.114(A) NMAC), as applied by the Division, is unconstitutionally vague by subjecting Targa to enforcement action and civil penalties without discernible criteria to determine what conduct is necessary to avoid the penalties. It is well-established through New Mexico case law that “[a] statute will be held unconstitutional in violation of due process of law, if the statute either forbids or requires the doing of an act in terms so vague that [people] of common intelligence must guess at its meaning and differ as to its application.” *See, e.g., Tri-State Generation and Transmission Ass’n, Inc., v. D’Antonio*, 2012-NMSC-039, ¶ 52, 289 P.3d 1232, 1244 (*quoting State v. Segotta*, 1983-NMSC-092, ¶ 5, 100 N.M. 498, 499, 672 P.2d 1129, 1130); *Bokum Res. Corp. v. New Mexico Water Quality Control Comm’n*, 1979-NMSC-090, ¶ 17, 93 N.M. 546, 550, 603 P.2d 285, 289; *Kerr-McGee Nuclear Corp. v. New Mexico Water Quality Control Comm’n*, 1982-NMCA-015, ¶ 13, 98 N.M. 240, 244, 647 P.2d 873, 877.

11. The penalties assessed in the Compliance Order of more than \$15,000 per day is barred by and inconsistent with the Air Quality Control Act, Section 74-2-12(A). By way of illustration, the penalties assessed of more than \$15,000 per day for the alleged noncompliance with 20.2.7.114 NMAC and the alleged failure to timely submit excess emissions reports are improper, unauthorized, and *ultra vires*.

12. The requirement for specific compliance measures, including the requirement to “complete 16 projects, initiatives, and improvements as outlined in the August 9, 2024 letter to AQB” are beyond the compliance powers authorized by the Air Quality Control Act, Section 74-2-12(A)(1).

13. The assessment of administrative compliance costs is not authorized by the Air Quality Control Act, including Section 74-2-12(A) and Section 74-2-12.1(B), and therefore, fails to state a claim upon which relief can be granted.

14. The substantial time between the AQB's alleged observation of violations and the assessment of penalties for these alleged violations violates due process under the Fourteenth Amendment of the United States Constitution and Article II, Section 18 of the New Mexico Constitution.

15. The orders and the penalty assessment in the Compliance Order are barred by the doctrines of laches and estoppel because of the substantial delay between alleged observed violations and the assessment of penalties based on those violations.

16. The Air Quality Control Act, Section 74-2-12(C), authorizing the Secretary of Environment to both assess and then preside over the adjudication of administrative penalties in excess of \$40,000,000 violates Targa's right to due process under the Fourteenth Amendment of the United States Constitution and Article II, Section 18 of the New Mexico Constitution. The statement in Paragraph 45 of the Compliance Order that "the Secretary or his designee has concurred with this enforcement action" compounds the violation of due process.

17. In addition, Targa reserves the right to identify additional defenses that become apparent through the course of this matter.

#### **PRAYER FOR RELIEF**

Targa respectfully requests that the Secretary grant the following relief:

1. Deny the violations alleged in the Compliance Order, to the extent contested by Targa;

2. Deny the relief requested in the Compliance Order, including the specified corrective actions, the assessed civil penalties, and the assessed compliance costs; and,
3. Such other relief as the Secretary deems just and proper, including, but not limited to, reduction of the penalty assessment.

Respectfully submitted,

SPENCER FANE LLP

By: /s/ Jeffrey J. Wechsler  
Jeffrey J. Wechsler  
Kari E. Olson  
325 Paseo De Peralta  
Santa Fe, NM 87501-1860  
(505) 982-3873  
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and

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100 Congress Avenue Suite 1100  
Austin, TX 788701  
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*Attorneys for Targa Northern Delaware LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 3, 2025, a true copy of the foregoing ***Respondent Targa Northern Delaware LLC's Request for Hearing and Answer to Compliance Order*** was served via electronic mail to the following:

Kelly Villanueva  
Assistant General Counsel  
[kelly.villanueva@env.nm.gov](mailto:kelly.villanueva@env.nm.gov)

*Attorney for New Mexico Environment Department*

By: /s/ Jeffrey J. Wechsler  
Jeffrey J. Wechsler

**STATE OF NEW MEXICO  
BEFORE THE SECRETARY OF THE ENVIRONMENT**

**NEW MEXICO ENVIRONMENT DEPARTMENT,**

**Complainant,**

**v.**

**No. AQB Case: LUC-29885-2201**

**Targa Northern Delaware LLC,**

**Respondent.**

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**ADMINISTRATIVE COMPLIANCE ORDER**

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Pursuant to NMSA 1978, Section 74-2-12 of the New Mexico Air Quality Control Act (“Act”) (collectively, NMSA 1978, §§ 74-2-1 through -17 (as amended through 2021)), the Environmental Protection Division (“Division”) of the New Mexico Environment Department (“Department” or “NMED”) issues this Compliance Order (“Order”) to Targa Northern Delaware, LLC (“Targa”), to require compliance and assess a civil penalty for the violations of the Act, the Air Quality Regulations at Title 20, Part 2 (“Regulations”) of the New Mexico Administrative Code (“NMAC”), and violations of an air quality permit regulations at the Red Hills Gas Processing Plant (“Facility”).

As set forth in the detailed allegations below, the Facility has reported excess emissions events through the Air Quality Bureau Compliance Reporting program (AQBCR) and has several instances of submitting late excess emissions reports (EERs). In addition, Targa Northern Delaware submitted inadequate Root Cause Analyses for over 50 events. A summary of these alleged violations is set forth in Table 1 below. This Order addresses the seriousness of the violations and the necessary corrective actions required to address them.

**Table 1: Summary of Violations**

<b>Violation Number</b>	<b>Permit Condition and/or Regulation Violated</b>	<b>Violation Description</b>
1	NSR Permits 4310 M3-M5R1, Specific Conditions A106.A and A107.A	Exceeding tons per year emission limits for flare units 1-EP-2, 2.5-EP-5, 2-EP-2a, and 4-EP-2a. This violation is supported by data agreed upon by Targa and NMED.
2	NSR Permits 4310 M3-M5R1, Specific Condition A106.A and A107.A	Exceeding pound per hour emission limits for units EP-5, EP-6, EP-8, 1-EP-2, 2.5-5, 2-EP-2a, 4-EP-2a, 4-EP-2a, 5.5-EP-2a, 2.5-EP-5, 3-EP-2a, 3-T, 5-EP-2, 2-EP-1h, 2-EP-1b, and EP-10. This violation is supported by EERs submitted by Targa.
3	NMAC 20.2.7.110.A	Failure to submit EERs according to appropriate timeframes in NMAC 20.2.7.110.A. The evidence comes from EERs submitted by Targa through AQBCR.
4	NMAC 20.2.7.114	Failure to adequately meet the requirements of a root cause analysis and failure to provide an analysis describing the root cause of the fifty-four excess emission events requested.

**FACTUAL BACKGROUND**

1. Targa owns and operates the Facility that is located at latitude 32.210556 and longitude -103.523889, Lea County, New Mexico.

2. During all relevant times, the Facility operated under the following permits:

Permit type	Permit number	Effective date	NMED Attachment Number
NSR	4310M3R1	January 22, 2018	1
NSR	4310M4	December 28, 2018	2
NSR	4310M4R1	January 31, 2019	3
NSR	4310M5	December 30, 2019	4
Title V	P278	June 26, 2019	5
Title V	P278M1	October 6, 2022	6

3. On July 8, 2022, an Air Quality Bureau (AQB) compliance reports analyst reviewed EERs submitted by the Facility between August 1, 2021, and June 30, 2022, through AQBCR. These EERs represented excess emissions events that occurred between November 11, 2018, and November 30, 2021. The analyst issued a Post-Inspection Notification (PIN) to the owner of the Facility at the time, Lucid Energy Delaware, LLC (“Lucid”), on July 11, 2022 [NMED Attachment 7]. This PIN became the basis of Enforcement case number LUC-29885-2201.

4. On July 12, 2022, the AQB analyst and Lucid personnel met by phone to discuss the PIN and tolling agreement sent with the PIN.

5. On July 28, 2022, Lucid personnel hand-delivered a copy of a Tolling Agreement to AQB’s office, signed by Lucid [NMED Attachment 8], and the signed PIN for LUC-29885-2201 [NMED Attachment 9]. The tolling agreement extended the statute of limitations until May 31, 2023. At that time, Lucid personnel stated that they would have corrections on 21 of 102 reports.

6. On July 29, 2022, Targa acquired the Facility from Lucid [NMED Attachment 10].

7. On September 17, 2022, Targa personnel submitted a revised spreadsheet with corrections to the EERs. [NMED Attachment 11]. The AQB analyst met with a Targa

representative by phone to discuss the revised calculations but still had remaining questions regarding missing values for expected combustion pollutants.

8. On January 3, 2023, the Compliance & Enforcement Chief (“Section Chief”) requested sample calculations and clarifications, which Targa supplied on January 10, 2023. **[NMED Attachment 12].**

9. On February 2, 2023, The Section Chief requested further clarifications. On February 10, 2023, Targa personnel and AQB managers met to discuss the proper reporting of excess emissions. The Section Chief requested recalculations of the tons per year emissions for each pollutant, broken down by equipment, for all months from July 2017 through January 2023.

10. On February 27, 2023, Targa personnel and AQB managers met to discuss the status of the requested revised calculations. On March 3, 2023, the Bureau received seven new spreadsheets regarding excess emissions calculations. On March 7, 2023, Targa personnel confirmed an error in the data sent for the AGI flare **[NMED Attachment 13].**

11. On April 19, 2023, Targa signed the first Amended Tolling Agreement for this case **[NMED Attachment 14].** The Amended Tolling Agreement extended the statute of limitations until May 31, 2024

12. On July 18, 2023, NMED issued the NOV for LUC-29885-2201 **[NMED Attachment 15].**

13. On August 2, 2023, an NMED assistant general counsel sent an email to Targa granting a request to extend the due date for the response to NOV LUC-29885-2201 from July 24, 2023, to September 15, 2023 **[NMED Attachment 16].**

14. On September 15, 2023, Targa submitted a response to NOV LUC-29885-2201 **[NMED Attachment 17].**

15. On December 21, 2023, NMED notified Targa that they would be required to submit a Root Cause Analysis (RCA) for each of their Facility's EERs between September 20, 2023, and December 21, 2023 [**NMED Attachment 18**].

16. On January 25, 2024, Targa sent an Email request to extend the due date for the RCAs from February 19, 2024, to April 19, 2024 [**NMED Attachment 19**].

17. On January 30, 2024, NMED granted Targa's RCA extension request from February 19, 2024, to April 19, 2024 [**NMED Attachment 20**].

18. On April 19, 2024, Targa submitted the RCAs for LUC-29885-2201 [**NMED Attachment 21**].

19. On April 22, 2024, an AQB enforcement specialist compiled a list of six hundred forty-seven (647) EERs from the Facility between June 1, 2023, and April 22, 2024. These EERs represent six hundred forty-seven (647) more instances for alleged violation #2 in LUC-29885-2201 and thirty-nine (39) more instances for alleged violation #3 [**NMED Attachment 22**].

20. On April 26, 2024, the AQB enforcement specialist issued a PIN for the EERs between June 1, 2023, and April 22, 2024 [**NMED Attachment 23**]. The PIN initially counted these EERs as a new violation but now these events are included as additional instances of alleged violation #2.

21. On May 14, 2024, Targa signed the Second Amended Tolling Agreement [**NMED Attachment 24**]. The Second Amended Tolling Agreement extends the statute of limitations for this case to May 31, 2025.

22. On July 12, 2024, NMED sent Targa a letter notifying the company that the RCAs were not acceptable, and a fourth violation would be added to the NOV [**NMED Attachment 25**].

23. On August 9, 2024, Targa submitted revised RCAs to NMED. [**NMED**

**Attachment 26].**

**VIOLATIONS -LUC-29885-2201**

**Violation 1**

Failure to operate the Red Hills Gas Processing Plant's flare units 1-EP-2, 2.5-EP-5, 2-EP-2a and 4-EP-2a within allowable emission limits for four regulated pollutants pursuant to NSR Permits 4310 M3-M5R1, Specific Conditions A106.A and A107.A.

**Violation 1 Background**

24. The allowable emission limits in tons per year for each permit are included in **NMED Attachment 27.**

**Violation 1 Summary**

25. Initially, Lucid had not submitted adequate records for the emissions of the four flares in this alleged violation. After an exchange of emails, Targa certified a list of the Facility's emissions from the four flares with data tables submitted on March 3, 2023. NMED has taken that data and calculated the amount of excess emissions and the extent to which the Facility exceeded their limits [**NMED Attachment 28**].

26. The tables from Targa show 226 claims of this violation. Each claim represents a month of exceedances for an individual pollutant.

**Violation 2**

Failure to operate the Red Hills Gas Processing Plant within allowable emission limits for four regulated pollutants pursuant to NSR Permits 4310 M3-M5R1, Specific Conditions A106.A and A107.A.

**Violation 2 Background**

27. After reviewing Lucid's records, Targa sent NMED corrected spreadsheets with excess emissions calculations for three thermal oxidizers (TOs), units EP-5, EP-6, and EP-8 [**NMED Attachment 29**].

28. The excess emissions events between June 1, 2023, and April 22, 2024, are subject to NSR Permit 4310-M5, Specific Conditions A106 and A107 [**NMED Attachment 30**]. Emitting units not listed in these tables are considered unpermitted.

### **Violation 2 Summary**

29. Between August 1, 2021, and June 30, 2022, Lucid submitted 102 final emissions reports for events that occurred between November 11, 2018, and November 30, 2021. Lucid submitted no Affirmative Defense Demonstrations (ADDs) for these events. After acquisition, Targa found errors in Lucid's calculations. Targa corrected Lucid's excess emission calculations and sent NMED the corrections for these events on March 3, 2023. The new calculations showed 287 excess emissions events from the three thermal oxidizers between April 10, 2020, and January 29, 2023. Together, these events released 1,300,736 pounds of VOCs and 8,329 pounds of H<sub>2</sub>S in excess emissions [**NMED Attachment 31**].

30. Between June 1, 2023, and April 22, 2024, Targa submitted 647 EERs for the Facility using AQBCR. In total, these events emitted 70,298.6 pounds of CO, 39,504.6 pounds of NO<sub>x</sub>, 59,315.9 pounds of SO<sub>2</sub>, 485,369.0 pounds of VOCs, and 3,348.03 pounds of H<sub>2</sub>S [**NMED Attachment 22**].

31. Targa submitted 600 ADDs for the events between June 1, 2023, and April 22, 2024. Nearly all are listed as malfunctions or emergencies. These ADDs will not be accepted because according to 20.2.7.111.A (8), an ADD can only be accepted if the "excess emission was not part of a pattern indicative of inadequate design, operation, or maintenance." In addition, 20.2.7.113.A NMAC states, "An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, or careless or improper operation." NMED takes the Facility's record of at least one excess emissions event per day on

average as evidence that the Facility has a pattern of inadequate design, operation, or maintenance and that improper operation of the Facility exists.

### **Violation 3**

Failure to submit excess emissions reports by the appropriate time frames is in violation of 20.2.7.110.A NMAC.

### **Violation 3 Background**

32. In relevant part, 20.2.7.110.A NMAC states:

“A. The owner or operator of a source having an excess emission shall report the following information to the department on forms provided by the department. The department may authorize the submittal of such reports in electronic format.

- 1) Initial Report: the owner or operator shall file an initial report, no later than the end of the next regular business day after the time of discovery of an excess emission that includes all available information for each item in Subsection B of 20.2.7.110 NMAC.
- 2) Final Report: the owner or operator shall file a final report that contains specific and detailed information for each item in Subsection B of 20.2.7.110 NMAC, no later than ten (10) days after the end of the excess emission.”

### **Violation 3 Summary**

33. Between August 1, 2021, and June 30, 2022, Lucid submitted 102 final EERs for excess emissions events through AQBCR that occurred between November 11, 2018, and November 30, 2021. On July 11, 2022, a Bureau Analyst issued a Post-Inspection Notification (“PIN”), identifying two potential violations – for exceeding allowable emission limits and for failing to submit initial or final excess emission reports according to required timelines. Lucid personnel received the PIN the same day.

34. The Bureau analyst determined from their review of excess emissions reports submitted by Lucid that 101 initial reports were submitted at least 1 day late (beyond one business day after discovery) and all 102 final reports were submitted at least 1 day late (beyond ten business days after the end of the excess emission). This determination was based on Lucid’s indication of event discovery date (for initial reports) and event end time (for final reports). Initial reports were

submitted a total of 401 days late. Final reports were submitted a total of 29,718 days late [NMED Attachment 32].

35. On April 22, 2024, a Bureau enforcement specialist found that between June 1, 2023, and June 22, 2024, Targa failed to submit 27 initial EERs and 12 final EERs within the defined regulatory timelines in 20.2.7.110 NMAC. These reports were submitted through AQBCR. Initial EERs were submitted a total of 111 days late. Final EERs were submitted a total of 206 days late. A PIN was sent to Targa on April 24, 2024 [NMED Attachment 22].

#### **Violation 4**

Failure to adequately meet the requirements of a Root Cause Analysis, and failure to provide an analysis describing the root cause of the excess emissions, including the identification of available corrective actions alternatives, the estimated cost of each alternative, and a thorough analysis of probable effectiveness of each alternative, in violation of NMAC 20.2.7.114.

#### **Violation 4 Background**

36. In relevant part, 20.2.7.114 NMAC states:

“A. The owner or operator of a source having an excess emission, upon written request of the department, shall prepare an analysis that uses appropriate analytical tools and contains the following information.

- 1) An analysis describing the root cause and contributing causes of the excess emission;
- 2) An analysis of the corrective actions implemented or available to reduce the likelihood of a recurrence of the excess emission resulting from the causes identified under Paragraph (1) of Subsection A of 20.2.7.114 NMAC, including, as applicable:
  - a) identification of implemented or available corrective action alternatives, such as changes in design, operation and maintenance;
  - b) the estimated cost associated with each corrective action alternative;
  - c) the probable effectiveness of each corrective action alternative;
  - d) if no corrective action alternatives are available, a clear explanation providing an adequate justification for that conclusion; and
  - e) if one or more corrective actions are identified, a schedule for implementation and progress reports.”

### **Violation 4 Summary**

37. On December 21, 2023, NMED issued a letter to Targa requiring the company to submit a Root Cause Analyses (RCAs) for the Facility's excess emission events that had occurred between September 22, 2023, and December 21, 2023 [NMED Attachment 18]. The RCA was due on February 29, 2024.

38. On January 25, 2024, Targa sent a letter to NMED saying that they would not be able to make the February 19, 2024, deadline and requested an extension. On January 30, NMED issued a letter to Targa granting them an extension until April 19, 2024 [NMED Attachment 20].

39. Targa submitted their RCAs on April 19, 2024 [NMED Attachment 21].

40. NMED analyzed the RCAs with the help of an engineering firm and found that the RCAs did not include everything required by 20.2.7.114 NMAC. NMED sent a detailed letter outlining the inadequacies of the report to Targa on July 12, 2024 [NMED Attachment 25].

41. On August 9, 2024, Targa submitted revised RCAs [NMED Attachment 26]. The revised report was accepted by NMED.

### **EFFECTIVE DATE**

42. The Effective Date of this Order shall be the date upon which this Order is signed by the New Mexico Secretary of Environment ("Secretary") or the Secretary's designee.

### **COMPLIANCE ORDER**

43. Section 74-2-12(A) authorizes the Secretary to issue a compliance order requiring compliance with a regulation or permit.

44. Pursuant to the NMED Delegation Order dated November 26, 2024, the Bureau Chief may approve the commencement of a civil enforcement action with concurrence by the Secretary or his designee.

45. The Secretary or his designee has concurred with this enforcement action.

46. Targa is ordered to take the following corrective actions for the four violations outlined above.

**Order 1:**

**Cease and desist excess emissions at the Red Hills Gas Processing Plant.**

47. Targa shall cease and desist from excess emissions at the Red Hills Gas Processing Plant that do not qualify for an affirmative defense pursuant to 20.2.7.111 NMAC.

48. Pursuant to 20.2.7.111.A (8) NMAC and 20.2.7.112.A (3) NMAC, affirmative defenses for malfunctions will no longer be accepted from the Facility. The almost daily excess emissions events are indicative of inadequate design, operation, or maintenance. Affirmative defenses for malfunctions will be considered again at NMED's discretion.

**Order 2:**

**Complete 16 projects, initiatives, and improvements as outlined in the August 9, 2024 letter to AQB.**

49. Targa shall complete the 16 projects, initiatives, and improvements outlined in the letter that was sent to AQB on August 9, 2024, as part of their revised Root Cause Analyses (pages 9-13 of the pdf) [NMED Attachment 26]. The 16 proposed projects, initiatives, and improvements are listed in the table in paragraph 51.

50. Between the issuance of this ACO and July 1, 2025, Targa shall submit three letters certifying the completion of their corrective actions. Each letter will describe the new projects, initiatives and improvements completed to date and include at least one piece of evidence of completion (e.g. an invoice, workorder or hiring document) per corrective action. Each letter shall also address whether any excess emissions purported to be resolved by the action have occurred after completion.

51. The three letters' due dates and contents are as follows:

Due Date	Corrective Action
January 6, 2025	Foaming Mitigation - Inlet Filtration Improvements
January 6, 2025	Temporary Flares for Pipeline Blowdowns
January 6, 2025	Amine Reboiler Tube Bundle Replacements
January 6, 2025	Thermal Oxidizer Low Combustion Air Flow Switch Replacement
January 6, 2025	LPG Vapor to Overhead Compression
January 6, 2025	Flash Gas Vapor Recovery Compression (VRU)
January 6, 2025	AGI Acid Gas Pipeline
February 3, 2025	Liquid Handling System Improvements
February 3, 2025	AGI-2 Plant Commissioning and Reliability Improvements
February 3, 2025	Plant Control Logic Improvements
February 3, 2025	Process Equipment Specialist - Thermal Oxidizer Reliability Improvements
February 3, 2025	Field and Plant Gas Quality Monitoring Improvements
February 3, 2025	Plant Compression RTD and Vibration Transmitter Improvements
February 3, 2025	Electrical Protective Device Coordination Study
July 1, 2025	Condensate Tank ECD Replacement
July 1, 2025	Network Infrastructure Upgrades

52. A change in the above timeline can only occur with the approval of both Targa and NMED.

### **CIVIL PENALTY**

53. Section 74-2-12(A) of the Act authorizes the Secretary to issue a compliance order assessing a civil penalty for a violation of the Act, the Regulations, or a condition of a permit issued under the Act.

54. Section 74-2-12(B) of the Act authorizes the Secretary to assess a civil penalty of up to fifteen thousand dollars (\$15,000.00) per day of noncompliance for each violation under Section 74-2-12(A).

55. For the violations described in this order, the Department has calculated and assessed a civil penalty of \$47,833,048.21 consistent with the NMED-AQB Civil Penalty Policy, with a maximum penalty of \$15,000.00 per violation per occurrence. A summary of the penalty calculations is attached [**NMED Attachment 33**].

### **ADMINISTRATIVE COMPLIANCE COSTS**

56. The Department will invoice Targa in the amount of \$109,796.28 for administrative compliance costs incurred to date that are associated with this matter. To the extent that Targa does not resolve this matter within 30 days, including the payment of the civil penalty, Targa will continue to accrue additional administrative compliance cost up to \$2,500.00 per day, pursuant to Section 74-2-12.1(B).

### **NOTICE OF OPPORTUNITY TO ANSWER AND REQUEST A HEARING**

57. Pursuant to Section 74-2-12(C) and 20.1.5.200 NMAC, Targa may request a public hearing by filing a written Request for Hearing with the hearing clerk no later than 30 days from receipt of this Order. The Request for Hearing shall include an Answer:

- a. Admitting or denying each alleged finding of fact. Any alleged finding of fact which is not specifically denied shall be deemed to be admitted. Targa may assert that it has insufficient knowledge of any alleged finding of fact, and such finding shall be deemed to be denied;
- b. Asserting any affirmative defense upon which Targa intends to rely. Any affirmative defense not asserted in the Answer, except an affirmative defense asserting lack of subject matter jurisdiction, shall be deemed to be waived;
- c. Signed under oath or affirmation that the information contained therein is true and correct to the best of the signatory's knowledge; and
- d. Attaching a copy of this Order.

58. This Order shall become final upon Targa's receipt of the Order unless Targa files a Request for Hearing and Answer as set forth above. Targa may file a Request for Hearing and Answer at:

Pam Jones, Paralegal/Hearing Clerk Office of Public Facilitation  
New Mexico Environment Department  
1190 St. Francis Drive  
Santa Fe, NM 87505  
Telephone: 505-660-4305  
[pamela.jones@env.nm.gov](mailto:pamela.jones@env.nm.gov)

59. The public hearing shall be governed by 20.1.5 NMAC.

#### **SETTLEMENT CONFERENCE**

60. Targa may confer with the Department regarding settlement at any time, but a settlement conference or request for a settlement conference shall not extend or waive the deadline

for filing a Request for Hearing and Answer. Targa may appear at a settlement conference *pro se* or through counsel. The Secretary or the Secretary's designee shall execute any settlement as a Stipulated Final Order. A Stipulated Final Order shall resolve all issues raised in this Order, shall bind all parties to this Order, and shall not be appealable. To confer regarding settlement, contact:

Kelly Villanueva, Assistant General Counsel  
New Mexico Environment Department  
121 Tijeras Avenue NE, Suite 1000  
Albuquerque, NM 87102  
Telephone: (505) 795-4383  
[kelly.villanueva@env.nm.gov](mailto:kelly.villanueva@env.nm.gov)

**TERMINATION**

61. This Order shall terminate upon approval of the Secretary or the Secretary's designee of a Stipulated Final Order.

**NEW MEXICO ENVIRONMENT DEPARTMENT**

DocuSigned by:  
**BY:** Cindy Hollenberg **DATE:** 12/5/2024  
8C5B75B327A8482...  
Cindy Hollenberg  
Air Quality Bureau Chief  
New Mexico Environment Department

**CERTIFICATE OF SERVICE**

I certify that on December 5, 2024, this Compliance Order was served by email and by

U.S. Mail Certified Mail to:

Sara W. Feucht  
Director – ES&H Services  
Targa Resources  
811 Louisiana Street  
Suite 2100  
Houston, TX 77002  
email: [SFeucht@targaresources.com](mailto:SFeucht@targaresources.com)

*/s/ Kelly Villanueva*

---

Kelly Villanueva Assistant General Counsel  
New Mexico Environment Department



February 28, 2024

Ms. Cindy Hollenberg  
Compliance & Enforcement Section Chief  
New Mexico Environmental Department – Air Quality Bureau  
Compliance and Enforcement Section  
525 Camino de los Marquez, Suite 1  
Santa Fe, New Mexico 87505

***Re: Final Audit Report under New Mexico Environmental Department's (NMED)  
Voluntary Environmental Disclosure Policy  
Targa Northern Delaware LLC (formerly Lucid Energy Delaware, LLC)***

Dear Ms. Hollenberg:

In accordance with your memorandum dated October 26, 2022, Targa Northern Delaware LLC (Targa) is hereby submitting the final audit report and certification form. We appreciate the opportunity to work directly with you and your staff on this audit and we appreciate the submittal date extension to February 28, 2024.

As you know, Targa acquired numerous assets from another midstream company and voluntarily undertook a comprehensive environmental audit under the NMED Environmental Disclosure Policy. Specifically, Targa audited environmental compliance across 34 acquired facilities from Lucid Energy Delaware, LLC. Since initiating the post-acquisition audit, Targa has submitted monthly audit reports to the Air Quality Bureau (AQB), documented the progress of the audit and any deviations from the anticipated schedule, and disclosed any potential violations (including a determination as to whether the potential violations were verified or were interim findings). In order to perform an audit of this magnitude, Targa hired a team of experts from Trinity Consultants (Trinity) to spearhead the compliance review. Working together, Targa and Trinity disclosed approximately 448 violations, approximately 100 of which will be corrected through air permitting revisions. In part due to the complexity of understanding and integrating assets that Targa did not previously own or operate, the auditing process has been extensive and required a considerable dedication of Targa's resources and manpower.

With the exceptions of those audit findings that require a permit revision as corrective action, Targa has successfully closed all audit findings. Air permit applications required as corrective action will be submitted to the NMED based on the schedule previously blessed by the AQB Permitting Section Manager.

Targa and the AQB have a long history of cooperatively working together to resolve compliance issues. Targa offers this final report in that spirit, and Targa is confident that these auditing efforts and the corrective actions that they have spurred and will continue to spur will result in significantly enhanced environmental compliance in New Mexico.

EXHIBIT B

Ms. Cindy Hollenberg  
Compliance & Enforcement Section Chief  
New Mexico Environmental Department – Air Quality Bureau  
Page 2

Targa would like to request a meeting as soon as possible to discuss this final report in detail with the AQB to address any additional questions or concerns. In the meantime, please do not hesitate to contact me at (713) 584-1064.

TARGA NORTHERN DELAWARE LLC

Sincerely,

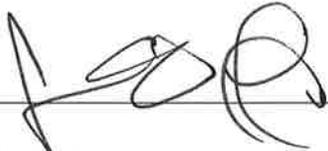
A handwritten signature in black ink, appearing to read "Charles Bates", with a long horizontal flourish extending to the right.

Charles Bates  
Advisor – Air Quality

Attachments – final audit report, certification

Ms. Cindy Hollenberg  
Compliance & Enforcement Section Chief  
New Mexico Environmental Department – Air Quality Bureau  
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I hereby certify that Targa Northern Delaware LLC has completed the audit, findings are accurate, and corrective actions have been taken. All required documentation has been submitted electronically by the due dates specified.

  
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Signature

2/28/24  
Date

Printed Name: Jimmy Oxford  
Title: Vice-President, Operations

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
1	Road Runner Gas Plant	All heaters (4-EP-2, 4-EP-4, 4-EP-5, 4-EP-3B)	All sources of air contaminant emissions must be authorized by some appropriate permitting mechanism.	Failure to properly authorize heaters based on maximum heat release duty.	20.2.72.200 NMAC	Units were permitted for heat absorbed rather than heat released which underestimated the PTE. It is unknown if permitted duty was actually exceeded.	Verified	Permit revision submitted 12/16/2022.	10/31/2022	Heater construction dates are: EP-2 (7/10/2014); EP-3A (9/20/2017); EP-4 (2017); EP-5 (3/9/2011); EP-6 (2017)	Submit permit revision to properly authorize heaters.	12/16/2022	Corrective application submitted 12/16/22.
2	Road Runner Gas Plant	T-1, T-2, T-3, T-4, T-5 (all tanks have been installed.)	40 CFR 60 Subpart Kb	Tanks are being evaluated as possibly being located after the point of "custody transfer" and therefore subject to NSPS Kb requirements.	60 CFR 60.110b	Units were previously permitted as NSPS Kb exempt tanks per 40 CFR 60.110b(d)(4) (located prior to the point of custody transfer). Targa is evaluating this historical applicability determination.	Verified	Compliance monitoring plan developed/submitted and applicability determination updated in permit.	11/17/2022	{30 days after start of construction, per 60.7(a)(1). Construction date is 4/10/2017.}	1) Confirm Kb applicability; 2) If applicable, comply with Kb.	Compliance Monitoring Plan: 4/28/23	Kb applicability updated in 12/16/22 application submittal. Monitoring Plan Submitted: 4/28/2023
3	Road Runner Gas Plant	T-7, T-8 (Methanol Tanks) Diesel Tanks	Sources exempt under 20.2.72.202.B must be represented on permit application forms provided by NMED.	Failure to identify two methanol tanks on NMED forms. Failure to identify two diesel fueling totes on NMED forms.	20.2.72.202.B NMAC	The tanks are exempt from Part 72 permitting per 20.2.72.202.B(5) but were constructed without representation on NMED forms in permit applications.	Verified	Permit revision submitted 12/16/2022.	11/17/2022	1500 gal tank has a construction date of 07/24/2017; 1000 gal tank has a construction date of 2022.	Submit permit revision to properly represent exempt status of the tanks.	12/16/2022	Corrective application submitted 12/16/22.
4	Road Runner Gas Plant	Site	Retain monitoring records, including the date, time, and duration of each SSM event, as well as a description of the event including maintenance performed.  Calculate hourly emissions for each SSM event.	Not maintaining sufficient SSM event records as required in A107.C, A107.D and B109.C  Site is not calculating emissions for each SSM event.	A107.C A107.D B109.C	Site is reporting and recording flare volumes in whole but is not keeping event-specific records as required in this permit condition. Routine flaring for off-spec condensate vessel was witnessed 12/12/22.  Site was unable to provide records showing hourly SSM emission calculations.	Verified	Site specific emission calculation tool developed. Daily flare volume report process implemented. Recordkeeping and Reporting process initiated 2/1/2023. Training completed week of 2/6/2023.	12/13/2022	Pre-acquisition	Keep records of SSM events as required in these permit conditions.	2/17/2023	Recordkeeping and Reporting process initiated 2/1/2023 Training completed 2/8/2023
5	Road Runner Gas Plant	Site	Report excess emissions per 20.2.7 NMAC	Site has not appropriately tracked or reported upset/malfunction events vs. routine SSM.	B110.E, F 20.2.7 NMAC	SSM/M events should be categorized as routine or upset. Permit M3 does not include authorized upset emissions. As such, excess emission must be reported per 20.2.7 NMAC.	Verified	Tracking process initiated 2/1/2023. Training completed week of 2/6/2023.	12/13/2022	Pre-acquisition	Each SSM/M event must be categorized as routine or malfunction. Requirements for recording and reporting are in B109.C and B110.E and F. Report as required in 20.2.7 NMAC.	2/17/2023	Tracking process initiated 2/1/2023 Training completed 2/8/2023
6	Road Runner Gas Plant	FUG	Comply with NSPS OOOOa LDAR provisions.	Atlas (LDAR subcontractor) has been monitoring site fugitives under 40 CFR 60 Subpart OOOO rather than OOOOa.	A209.D 40 CFR60.5360a(a) 40 CFR 60.5365a(f)	Atlas has been monitoring under NSPS OOOO. Since the site commenced construction after 9/18/2015, NSPS OOOOa is applicable rather than NSPS OOOO.	Verified	OOOOb LDAR monitoring complete.	12/13/2022	Pre-acquisition	Begin monitoring under NSPS OOOOa.	Next monitoring event (February 2023 Monitoring w/ Report March 2023)	LDAR monitoring completed 2/22/2023
7	Road Runner Gas Plant	Site	At least once per year during an SSM event, the permittee shall conduct a visible emissions observation in accordance with the requirements at 40 CFR 60, Appendix A, Reference Method 22.	Not compliant with this requirement.	A206.A	The site has not conducted a Method 22 test during an SSM event.	Verified	Trained on-site personnel and records complete.	12/13/2022	Pre-acquisition	Train onsite personnel on Method 22 monitoring and schedule for at least one SSM event per year. Keep required records.	11/30/2023	6/6/2023
8	Road Runner Gas Plant	Tanks (T-1 through T-6)	Record the monthly total throughput of liquids. Each month, during the first 12 months of monitoring, the permittee shall record the cumulative total liquid throughput and after the first 12 months of monitoring, the permittee shall calculate and record the monthly rolling 12-month total liquid throughput.	Appropriate records not being maintained.	A203.A	Rolling 12-month volumes of condensate and wastewater (produced water) are not being recorded for the purposes of complying with this permit condition.	Verified	Implemented a 12-month rolling tracking spreadsheet.	12/13/2022	Pre-acquisition	Develop a 12-month rolling tracking spreadsheet for tank throughput.	3/31/2023	3/16/2023
9	Road Runner Gas Plant	Plant 1	Unless modified by conditions of this permit, the permittee shall construct or modify and operate the Facility in accordance with all representations of the application.	Form UA-2 in April 2020 application represents 220 MMSCFD for Plant 1, but site has achieved throughputs exceeding this level.	B101.A, B110.C	Plant 1 has consistently achieved throughputs greater than 220 MMSCFD, although the site as a whole remains less than the authorized 880 MMSCFD.	Verified	Permit revision submitted 12/16/2022.	1/3/2023	Pre-acquisition	An application with a higher throughput for Plant 1 was submitted 12/16/22.	12/16/2022	Corrective application submitted 12/16/22.
10	Road Runner Gas Plant	TEG Dehy EP-7	Demonstrate compliance with Table 106.A emission limits by conducting an extended gas analysis on the dehydrator inlet gas annually and by calculating emissions using ProMax, GRI-GlyCalc, or another method if approved by the Department. Keep Records.	Insufficient records demonstrating compliance.	A202.A	Permit requires annual extended TEG dehydrator inlet analyses, and that the analyses be used for annual compliance calculations, and records be kept. Records were not available to show compliance with this requirement.	Verified	Calculations performed and process in place to ensure compliance.	1/3/2023	Pre-acquisition	Perform required calculations.	3/10/2023	2/27/2023

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11	Road Runner Gas Plant	Thermal Oxidizer EP-9	The permittee shall determine a combustion temperature that achieves the required destruction efficiency from periodic emissions testing performed in accordance with A208.E, monitor the combustion temperature of the thermal oxidizer continuously, and record the average temperature each 24-hour period. Compliance with this condition is defined as operating with temperatures within +/- 5% of the combustion temperature during the emissions test.  Test results for pre-control and post-control VOCs shall be used to calculate the destruction efficiency of the TO at the operator-defined operating conditions. Compliant destruction efficiency is defined as a percentage equal to or greater than 99.9%.	No source test was provided that was used to establish proper operating temperature to achieve 99.9% DRE.	A208.D A208.E	Permit requires that a source test be performed to establish the operating temperature that achieves 99.9% DRE for the TO. This source test was not located in records.  Site is required to perform annual source test of TO EP-9 (pre-control and post-control) and use the test results to demonstrate 99.9% destruction efficiency. No compliant records have been provided.	Verified	Testing complete.	1/3/2023	Pre-acquisition	Perform required testing.	5/31/2023	Test Completed: 5/18/2023
12	Road Runner Gas Plant	LOAD	The permittee shall record the monthly condensate truck loadout volume. Each month during the first 12 months of monitoring the permittee shall record the cumulative condensate loadout volume and after the first 12 months of monitoring, the permittee shall calculate and record a monthly rolling 12-month total loadout volume.	No compliant records were readily available.	A203.B	Permit requires throughput records for condensate load out to ensure compliance with permit throughput limits.	Verified	Implemented a 12-month rolling tracking spreadsheet.	1/23/2023	Pre-acquisition	Keep monthly and rolling 12-month records as required.	3/31/2023	3/16/2023
13	Road Runner Gas Plant	Portable Generator Gasoline Refueling Tank Portable Air Compressor Tie-In Unit	All sources of air contaminant emissions must be authorized by some appropriate permitting mechanism.	Portable diesel generator present on-site is not included in NSR permit.  300-gallon gasoline refueling tank present on-site is not included in NSR permit.  Portable diesel-driven air compressor present on-site is not included in NSR permit.  New tie-in unit with pigging operation is in the process of being installed. An air permit authorization was not obtained for this installation.	20.2.72.200 NMAC, B110.C	Portable generator not represented in current NSR permit.  300-gallon gasoline tank is present on-site. Determination must be made whether the tank is exempt or must be authorized.  Portable diesel-driven air compressor is not represented in current NSR permit.  Tie-in not represented in current NSR permit.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	1/23/2023	Pre-acquisition	Submit permit revision.	Submit update with next permit revision: 5/1/2024 (Significant Revision)	
14	Road Runner Gas Plant	EP-1	At least semi-annually, perform a visual inspection of all components of the monitor for physical and operational integrity and all electrical connections for oxidation and galvanic corrosion.	No compliant records were available.	B108.H(1)(d) B108.H(4)	The site was unable to provide documentation for these inspections.	Verified	Third party contractor has been contracted to conduct semi-annual inspections.	2/7/2023	Pre-acquisition	Perform inspections and maintain compliant records.	6/30/2023	6/26/2023
15	Road Runner Gas Plant	EP-1	Recalibrate the monitor in accordance with the manufacturer's procedures and specifications at the frequency specified by the manufacturer, or every two years, whichever is less.  All flow meters and inline chemical composition analyzers shall be installed, calibrated, operated and maintained in accordance with the requirements of Condition B108.H. (The owner or operator shall install, calibrate, operate and maintain monitoring instrumentation (monitor) according to the manufacturer's procedures and specifications and the following requirements.)	Manufacturer procedures and specifications were not available during the audit.	A206.B B108.H(1) B108.H(1)(e) B108.H(4)	The site was unable to provide documentation regarding completed manufacturer recommended maintenance and calibration for the flare flow meters.  Documentation regarding manufacturer maintenance and calibration protocol for the flare flow meters was not available during the audit.	Verified	Permit revision to allow operator procedures to be used.  Manufacturer calibration check schedule is every 24 months.	2/7/2023	Pre-acquisition	Ensure flow meters are operated, calibrated, and maintained per manufacturer specifications.	Next plant scheduled outage if calibration is required. (anticipated 4Qtr 2023)	Corrective application submitted 12/16/22.  Calibration checks completed 2/27.
16	Road Runner Gas Plant	EP-1	The monitor shall measure data for a minimum of 90 percent of the time that the emissions unit or the associated process is in operation, based on a calendar monthly average.	No compliant records were available.	B108.H (3)	Data completeness records had not been compiled to demonstrate this monthly requirement.	Verified	Records being maintained moving forward via SCADA reports.	2/7/2023	Pre-acquisition	Maintain compliant records.	6/30/2023	6/30/2023
17	Road Runner Gas Plant	EP-1	Records of all flowmeter and inline monitor certifications, calibrations, data capture calculations and documentation as specified by Condition B108.H, as well as any breakdowns, reasons for the breakdown, and corrective actions.	No compliant records were available.	A206.B	The site was unable to provide these records.	Verified	Permit revision to allow operator procedures to be used.  Manufacturer calibration check schedule is every 24 months.	2/7/2023	Pre-acquisition	Maintain compliant records.	Next plant scheduled outage if calibration is required. (anticipated 4Qtr 2023)	Corrective application submitted 12/16/22.  Calibration checks completed 2/27.
18	Road Runner Gas Plant	EP-1	The permittee shall also maintain a copy of the manufacturer specifications for operation and calibration or the site-specific operations and maintenance plan for flowmeters and inline monitors.	No compliant records were available.	A206.B	Documentation regarding manufacturer maintenance and calibration protocol for the flare flow meters was unavailable.	Verified	Record keeping work process in place to ensure compliance.	2/7/2023	Pre-acquisition	Maintain compliant records.	2/28/2023	2/20/2023

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19	Road Runner Gas Plant	EP-9	The flow meter(s), totalizer(s), and if used, the inline monitor shall be operated, calibrated, and maintained as specified by the manufacturer or equivalent and as necessary to ensure correct and accurate readings.  The following records shall be kept: (1) Flow Monitoring & (2) Calibration: Records of flowmeter, totalizer, and inline monitor certifications, calibrations, breakdowns, reasons for the breakdown, and corrective actions. If manufacturer's specifications are used to determine pilot and purge fuel gas flow, the manufacturer's specification documentation must be maintained.	No maintenance records were available for the audit.	A206.C	Documentation regarding completed manufacturer recommended maintenance and calibration for the flow meters was unavailable.	Verified	Permit revision to allow operator procedures to be used.  Manufacturer calibration check schedule is every 24 months.	2/7/2023	Pre-acquisition	Ensure flow meters are operated, calibrated, and maintained per manufacturer specifications.  Maintain compliant records.	Next plant scheduled outage if calibration is required. (anticipated 4Qtr 2023)	Corrective application submitted 12/16/22.  Calibration checks completed 2/27.
20	Road Runner Gas Plant	Reciprocating Compressors	Rod packing shall be replaced every 26,000 hours of operation or after 36 months.	Rod packing replacement for some compressors has not taken place within the required timeframe.	40 CFR Part 60.5415a(c)(3)	Visual inspection of records during site visit indicate that some reciprocating compressors are overdue for rod packing replacement based on hours of operation.	Verified	Maximo is now being used to schedule and record these maintenance activities.	2/7/2023	Pre-acquisition	Evaluate all compressors for current rod packing replacement timing and establish a system to notify operators when a replacement is required.	Future events scheduled in Maximo 6/30/2023	All overdue rod packing replacements completed January 2023.
21	Road Runner Gas Plant	Reciprocating Compressors	Submit annual reports containing the information in 40 CFR Part 60.5420a(b)(1) and (4)	No annual reports available to auditors.	40 CFR Part 65.5420a(b)(1), (4)	Annual reports for reciprocating compressor compliance were not available.	Verified	2022 annual reports were submitted, but not all elements were included. Complete reports will be submitted moving forward. The 2022 report was corrected and submitted.	2/7/2023	Pre-acquisition	Submit required report.	07/31/2023 (Submit Corrected Report)	7/31/2023
22	Road Runner Gas Plant	Reciprocating Compressors	Compliance records specified in 40 CFR Part 60.5420a(c)(3) for rod packing replacement are required to be kept for five years.	No compliant records or deviation reports were available.	40 CFR Part 60.5420a(c)(3)	Compliant records for reciprocating compressors were not available.	Verified	Maximo is now being used to schedule and record these maintenance activities.	2/7/2023	Pre-acquisition	Maintain compliant records.	6/30/2023	6/23/2023
23	Road Runner Gas Plant	NSPS OOOOa units	Submit notifications as required in 60.5420a(a)(1).	No NSPS OOOOa 60.7 notifications available to auditors.	40 CFR 60.5420a(a)(1); 40 CFR Part 60.7(a)(1), (3)	Initial notifications per 40 CFR Part 60.7 were not available for NSPS OOOOa.	Verified	Notification work process implemented.	2/7/2023	Pre-acquisition	Submit required notifications.	4/14/2023	4/20/2023
24	Road Runner Gas Plant	EP-7; 2-EP-7; 3-EP7	Maintain ongoing documentation that actual benzene emissions from each TEG unit are less than <0.9 MG/yr (1 tpy).	Ongoing calculation of actual emissions not available for inspection. Calculations were carried forward.	40 CFR 60.774(d)(1)(ii)	Records of compliant MACT HH TEG exemption calculations were not available.	Verified	Completed moving forward as part of annual EI reporting.	2/7/2023	Pre-acquisition	Maintain records specifically to demonstrate the ongoing MACT HH exemption.	3/31/2023	2/27/2023
25	Road Runner Gas Plant	Site	Submit notification to NMED specifying the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Letter notifying NMED that maximum production rate has been achieved was not available.	B110.B-3	Required notification to NMED not available.	Verified	Notification work process implemented.	2/7/2023	Pre-acquisition	Submit required notifications.	4/14/2023	4/21/2023
26	Road Runner Gas Plant	Site	General Recordkeeping requirements.	Site has not kept consistent records for many permit provisions, as required by this permit provision.	B109	There have been recent improvements with recordkeeping requirements. However, records are not always available for all requirements going back five years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	2/7/2023	Pre-acquisition	Better consistency in keeping records for the required time period is needed. Set up systems to consistently keep records with the required content and in the form required by the permit provision or regulation.	2/29/2024	2/28/2024
27	Road Runner Gas Plant	Amine Unit (EP-8)	Ensure that all uncondensed flash tank gases are routed back to the process.	Flash gas is sometimes routed to flare rather than being routed to a process point.	A208.A	Amine flash gas is sometimes routed to flare.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	1/24/2023	Pre-acquisition	Add an alternate operating scenario for routing amine flash gas to flare.	Submit update with next permit revision: 5/1/2024 (Significant Revision)	
28	Road Runner Gas Plant	Site	After receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date.	Serial numbers of some equipment reflected in the permit do not match the equipment present on site.	B110.B-2	Serial numbers of some equipment were not accurately reflected in the permit and were not updated after initial startup of each new or modified source.	Verified	Serial numbers managed in Maximo.	11/17/2022	Pre-acquisition	Submit updated serial numbers.	N/A	Corrective application submitted 12/16/22.

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1	Red Hills Gas Plant	1-T, 2-T	40 CFR 60 Subpart Kb	Tanks are being evaluated as possibly being located after the point of "custody transfer" and therefore subject to NSPS Kb requirements.	60 CFR 60.110b	Units were previously permitted as NSPS Kb exempt tanks per 40 CFR 60.110b(d)(4) (located prior to the point of custody transfer). Targa is evaluating this historical applicability determination.	Verified	Submit permit revision updating tank applicability. Draft control device monitoring plan will be completed after tank emission calculations are finalized as part of the permit revision.	1/20/2023	{30 days after start of construction, per 60.7(a)(1). Construction date is 4/10/2017.}	1) Confirm Kb applicability; 2) If applicable, comply with Kb.	Permit Revision Submittal: 6/15/2024 (PSD Application) Compliance Monitoring Plan: 6/15/2024	
2	Red Hills Gas Plant	Portable Generator Gasoline Refueling Tank Methanol Tanks All Heaters Plant 2 & 3 Slop Tank	All sources of air contaminant emissions must be authorized by some appropriate permitting mechanism.	Portable diesel generators present on-site is not included in NSR permit. 300-gallon gasoline tank is present on-site. Determination must be made whether the tank is exempt or must be authorized. Methanol Tanks at the site have not been previously represented in permit application forms. Failure to properly authorize heaters based on maximum heat release duty. Slop Tank for Plants 2 and 3 has not been represented in permit applications.	20.2.72.200 NMAC, NSR B110.C	Portable generators not represented in current NSR permit. 300-gallon gasoline tank is present on-site. Determination must be made whether the tank is exempt or must be authorized. Methanol tanks have not been previously included in permit applications. Units were permitted for heat absorbed rather than heat released which underestimated the PTE. It is unknown if permitted duty was actually exceeded. Slop Tank for Plants 2 and 3 has not been previously included in permit applications.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	1/20/2023	Pre-acquisition	Submit permit revision.	Permit Revision Submittal: 3/17/2024 (Significant Revision) Heaters Permit Revision Submittal: 6/15/2024(PSD Application)	
3	Red Hills Gas Plant	LOAD	Site must be constructed per permit application representations.	No vapor return line evident for LOAD point for tank group 1-T.	20.2.72.200 NMAC, B101.C	LOAD out point for tanks in group 1-T represented in permit application as having vapor return line with 100% vapor capture. No return line was evident upon inspection.	Verified	No loading occurs out of tank group 1-T. Any future truck loading will only occur from tank group 3-T. Permit will be revised to remove emission unit "LOAD".	1/20/2023	Pre-acquisition	Add return line or update permit application accordingly.	Permit Revision Submittal: 2/28/2024 (Admin Revision)	2/28/2024
4	Red Hills Gas Plant	2-EP-1t, 3-EP-1t, 4-EP-1t, 5-EP-1t, 6-EP-1t	Retain monitoring records, including the date, time, and duration of each SSM event, and track rolling 12-month total VOC emissions.	Not maintaining sufficient SSM event records for Cryo blowdowns as required in A107.C and B109.E.	Title V A107.C, B109.E	(Corrected Finding) Track cryo blow down emission events per the requirements in the permit conditions.	Verified	Monitoring, recordkeeping and reporting processes implemented.	12/13/2022	Pre-acquisition	Keep records of SSM events as required in these permit conditions.	3/31/2023	3/31/2023
5	Red Hills Gas Plant	Site	Report excess emissions per 20.2.7 NMAC	Site has not appropriately tracked or reported upset/malfunction events vs. routine SSM.	Title V B110.D, E 20.2.7 NMAC	SSM/M events should be categorized as routine or upset. Permit does not include authorized upset emissions. As such, excess emission must be reported per 20.2.7 NMAC.	Verified	Monitoring, recordkeeping and reporting processes implemented.	1/20/2023	Pre-acquisition	Each SSM/M event must be categorized as routine or malfunction. Requirements for recording and reporting are in Title V B110.E. Report as required in 20.2.7 NMAC.	3/31/2023	3/31/2023
6	Red Hills Gas Plant	1-EP-2, 2-EP-2a, 2.5-EP-5, 3-EP-2a, 4-EP-2a, 5-EP-2	Calculate hourly emissions for each Flare SSM event, and use these emissions to calculate rolling 12-month emissions. The permittee shall monitor the date, time, cause and duration of routine or predictable startup, shutdown, and scheduled maintenance events. Keep records per A107.E	Site is not calculating emissions for each Flare SSM event. Records not available to demonstrate compliance with the monitoring and recordkeeping requirements for Flare SSM events.	Title V A107.E, A206.D	(Corrected Finding) Site was unable to provide records showing hourly SSM emission calculations. SSM events are not being tracked in compliance with permit condition.	Verified	Monitoring, recordkeeping and reporting processes implemented.	1/20/2023	Pre-acquisition	Keep required records. Monitor and maintain records per the permit condition.	3/31/2023	3/31/2023
7	Red Hills Gas Plant	TEG Dehydrators (1-EP-3, 2a-EP-3, 3-EP-3, 4-EP-3, 5-EP-1e, and 6-EP-1e)	Standards, monitoring, recordkeeping, and reporting requirements for new large dehydrators at a HAP major source.	Comply with MACT HH requirements for new large TEG dehydrators located at a HAP major source.	MACT Subpart HH; P278M1 A209.E, B106.C	Permit claims the exemption for small dehydrators at area sources. This exemption is not available to the site since it is a major source of HAPs. The dehydrators are Large Dehydrators per the MACT HH definition in Part 63.761.	Verified	Completed moving forward as part of annual EI reporting.	2/10/2023	Pre-acquisition	Evaluate MACT HH applicability and develop compliance plan for meeting applicable requirements.	3/31/2023	2/27/2023
8	Red Hills Gas Plant	SSM Cryo Blowdown, ECD (EP-11, 2-EP-1t, 3-EP-1t, 4-EP-1t, 5-EP-1t, 6-EP-1t)	Perform a gas analysis once every calendar year, of the gas that is being directly vented from each listed unit	Gas analyses specifically to demonstrate compliance for the cryo unit blowdowns and TO venting were not available.	P278M1 A107.C	Complete records of gas analyses for this requirement were not available. 2022 Cryo gas analyses were available.	Verified	Data not available for full 5 years. System in place since 2022 to have the records going forward.	2/10/2023	Pre-acquisition	Comply with A107.C for annual gas analyses for cryo blowdowns and TO downtime.	3/17/2023	1/17/2022
9	Red Hills Gas Plant	Flares (1-EP-2, 2-EP-2a, 2.5-EP-5, 3-EP-2a, 4-EP-2a, 5-EP-2)	Conduct a performance test on the flare in accordance with the requirements at 40 CFR §60.485a(g), and the requirements at 40 CFR 60, Subpart A, §§60.8 (performance tests) and 60.18 (general control device requirements).	Flare maximum velocity calculations could not be provided by site.	P278M1 A206.A, A206.B, B109	No compliant records were available.	Verified	Monitoring, recordkeeping processes in place.	2/10/2023	Pre-acquisition	Perform monitoring (including maximum flare velocity calculations) and recordkeeping as required in A 206.A and A206.B.	4/7/2023	4/12/2023
10	Red Hills Gas Plant	Flares (1-EP-2, 2-EP-2a, 2.5-EP-5, 3-EP-2a, 4-EP-2a, 5-EP-2)	All flow meters and inline chemical composition analyzers shall be installed, calibrated, operated and maintained in accordance with the requirements of Condition B108.H.	No maintenance records were available for the audit.	P278M1 A107.D, B108.H, B109	Documentation regarding completed manufacturer recommended maintenance and calibration for the flow meters was unavailable.	Verified	Permit revision to allow operator procedures to be used. Manufacturer calibration check schedule is every 24 months.	2/10/2023	Pre-acquisition	Ensure flow meters are operated, calibrated, and maintained per manufacturer specifications. Keep appropriate records.	Permit Revision Submittal: 3/17/2024 (Significant Revision)	
11	Red Hills Gas Plant	Misc. Venting (SSM/M)	Perform a gas analysis once every year based on a calendar year of the gas vented during each SSM/M event. Calculate emissions and categorize each event for Table 107.A compliance. Report excess emissions as appropriate. Keep rolling 12-month records. Keep records per B109.	No records for the tracking of emissions under SSM/M were available.	P278M1 A107.F, B109	Appropriate emission calculations and records must be kept for all SSM events that fall under the SSM/M emission unit.	Verified	SSM/M recordkeeping process has been implemented.	2/10/2023	Pre-acquisition	This permit provision will require updating, as it is not achievable in practice. Targa will provide suggested language as part of the NSR True-Up application.	Permit Revision Submittal: 3/17/2024 (Significant Revision)	SSM/M Tracking Complete: 3/31/2023
12	Red Hills Gas Plant	Dehy Units (1-EP-3, 2a-EP-3, 3-EP-3, 4-EP-3, 5-EP-1e and 6-EP-1e)	Identify in a summary table all parameters that were used as inputs in the ProMax model. The permittee shall keep a record of the results, noting the emission rates for the dehydrator obtained from estimates using ProMax.	No summary table available.	P278M1 A202.A	Dehy inlet analyses have been collected and ProMax run. However, a summary table as required in the permit condition is not available.	Verified	Annual requirement. Will be completed as part of annual EI reporting moving forward.	2/10/2023	Pre-acquisition	Develop a summary table for ProMax runs per the permit condition.	3/31/2023	2/27/2023

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13	Red Hills Gas Plant	Plant 1 Dehy Still Vent (1-EP-3) and Plant 1 Flare (1-EP-2)	Still vent emissions shall be routed to a condenser and then routed to a thermal oxidizer for combustion.	Plant 1 dehy still vent VRU was down during site visit. Emissions being routed to flare (1-EP-2) rather than thermal oxidizer (EP-5).	P278M1 A202.B	The Plant 1 dehy still vent was being routed to the flare rather than the TO due to the associated VRU being down. No scheduled date to bring VRU back online.	Verified	Targa continues to evaluate permitting the dehy still vent to the flare vs restarting the VRU.	1/19/2023	Pre-acquisition	Route emissions to TO and/or add alternate operating scenario to permit.	Permit Revision Submittal: 6/15/2024 (PSD Application)	
14	Red Hills Gas Plant	Amine Unit (1-EP-4, 2-EP-4, 3-EP-4, 4-EP-4, 5-EP-1f)	Ensure that all uncondensed flash tank gases are routed back to the process.	Flash gas is sometimes routed to flare rather than being routed to a process point.	P278M1 A208.A	Amine flash gas is sometimes routed to flare.	Verified	Should only be 2-EP-4, 4-EP-4 and 5-EP-1f, 3-EP-4 and 6-EP-1f have not been constructed. Flash gas from 1-EP-4 is not routed to a flare. VRUs will be installed to route flash gas back to process. An AOS will be authorized for flaring when the VRUs are unavailable during SSM/M.	1/24/2023	Pre-acquisition	Add an alternate operating scenario for routing amine flash gas to flare.	VRU Installation Permit Revision Submittal: 2/28/2024 (Tech Rev) AOS Permit Revision Submittal: 6/15/2024 (PSD Application)	Tech Rev Submittal: 2/20/2024
15	Red Hills Gas Plant	Dehy unit and controls (1-EP-3, 2a-EP-3, 3-EP-3, 4-EP-3, 5-EP-1e, and 6-EP-1e)	The permittee shall inspect the glycol dehydrator and the control equipment semi-annually to ensure it is operating as designed and in accordance with the manufacturer's recommended procedures. The permittee shall also inspect that the reboiler is operating as initially designed and in accordance with the manufacturer's recommended procedures. The permittee shall maintain a copy of the manufacturer's maintenance recommendations.	Manufacturer maintenance documentation was not available.	P278M1 A202.B	Site is using a custom checklist. Manufacturer documentation not available during site visit.	Verified	Submit permit revision to allow for operator maintenance program.	1/19/2023	Pre-acquisition	Manufacturer recommendations not available. Permit will be updated to allow Targa-specific procedures.	Permit Revision Submittal: 3/17/2024 (Significant Revision)	
16	Red Hills Gas Plant	Plant 1 equipment / fugitives	NSPS OOOO	Atlas is monitoring under NSPS KKK. Construction on Plant 1 commenced after August 2011, so should be monitored under NSPS OOOO	NSPS OOOO	Based on date construction commenced, components in Plant 1 should be monitored and reported under NSPS OOOO rather than NSPS KKK.	Verified	OOOo LDAR monitoring complete.		Pre-acquisition	Verify correct applicability and begin monitoring and reporting under correct NSPS subpart.	6/30/2023	2/23/2023
17	Red Hills Gas Plant	Site	Compliance Certification Reports shall also be submitted to the Administrator at the address below (20.2.70.302.E.3 NMAC): Chief, Air Enforcement Section US EPA Region-6, R6 ECD-A 1201 Elm Street, Suite 500 Dallas, TX 75270	Compliance reports have been sent to NMED only.	P278M1 B105.D; 20.2.70.302.E.3 NMAC	Compliance reports must be sent to NMED and US EPA Region 6.	Verified	Annual Compliance Report was submitted to NMED and EPA Region 6 and will be submitted annually moving forward.	1/19/2023	Pre-acquisition	Send compliance reports to NMED and US EPA.	6/30/2023	6/30/2023
18	Red Hills Gas Plant	1-T-1, 1-T-2, 1-T-3, 1-T-4, 1-T-5, 1-T-6 and Unit 3-T (3-T-1, 3-T-2, 3-T-3, 3-T-4, 3-T-5, 3-T-6)	To demonstrate compliance during the first 12 months of monitoring, each month the permittee shall sum and record each unit's total cumulative liquids throughput as of the end of the calendar month. After the first 12 months of monitoring, the permittee shall record each unit's total liquids throughput each month and the monthly rolling, 12-month total throughput.	Records are being updated every six months. Missing December 2022 data.	P278M1 A 203.A	Records must be updated after the end of each calendar month to ensure ongoing compliance. Currently, records and calculations are updated every six months.	Verified	Recordkeeping processes have been implemented.	1/19/2023	Pre-acquisition	Update throughput spreadsheet on an ongoing basis for each calendar month.	3/31/2023	3/21/2023
19	Red Hills Gas Plant	Sour Tanks (2-T-1, 2-T-2)	Recordkeeping: To demonstrate compliance during the first 12 months of monitoring, each month the permittee shall sum and record each unit's total cumulative liquids throughput as of the end of the calendar month.	Records are being updated every six months. Missing December 2022 data.	P278M1 A203.B	Records must be updated after the end of each calendar month to ensure ongoing compliance. Currently, records and calculations are updated every six months.	Verified	Start moving forward and generate back up to 5 years based on data availability. Throughputs being tabulated weekly going forward.	1/19/2023	Pre-acquisition	Update throughput spreadsheet on an ongoing basis for each calendar month.	6/30/23	06/30/2023
20	Red Hills Gas Plant	Plant 5 Amine Unit (5-EP-1f)	To demonstrate compliance with the allowable SO2 (H2S), CO, VOC emission limits in Table 106.A, the unit inlet gas stream shall not exceed following: 1. 70 MMscf/day for 1-EP-4 2. 245 MMscf/day for 2-EP-4, 3-EP-4 and 4-EP-4 3. 250 MMscf/day for 5-EP-1f and 6-EP-1f.	Plant 5 exceeding 250 MMscf/day flowrate.	P278M1 A208.E	Daily flow records for the Amine Unit at Plant 5 indicates that it regularly exceeds 250 MMSCFD.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	1/19/2023	Pre-acquisition	Update permit to increase gas throughput at Plant 5.	Permit Revision Submittal: 6/15/2024 (PSD Application)	
21	Red Hills Gas Plant	Amine Units (Units 1-EP-4, 2-EP-4, 3-EP-4, 4-EP-4, 5-EP-1f and 6-EP-1f)	Monitoring: 1. The permittee shall calibrate the flow meter in accordance with the manufacturer's recommended schedule. The calibration shall be in accordance with the specifications at 40 CFR 98. Recordkeeping: The permittee shall keep records in accordance with Section B109, and of the following: 1. Flow meter calibration results 2. Daily total of natural gas throughput each day in units of MMscf/day	Flow meter calibrations are not being completed. No records available.	P278M1 A208.E	Flow meters are not being calibrated and no records of manufacturer calibration are available for review.	Verified	Flow meter was calibrated upon purchase/install. Calibration checks are ongoing to confirm proper operation of the meters.	2/14/2023	Pre-acquisition	Permit revision to allow for operator calibration schedule.	Permit Revision Submittal: 3/17/2024 (Significant Revision)	
22	Red Hills Gas Plant	Acid Gas Injection System	Acid gas flow meters will be calibrated as specified by the manufacturer or equivalent and as necessary to ensure correct and accurate readings.	No calibration data available and no ability to calibrate meters.	P278M1 A211; AGI and Flare CAM Plan	Calibration not being completed and no records of manufacturer calibration are available for review.	Verified	Manufacturer calibration check schedule is every 24 months. Calibration checks ongoing.	2/14/2023	Pre-acquisition	Complete flow meter calibrations per manufacturer schedule and maintain required records.	6/30/2023	6/30/2023
23	Red Hills Gas Plant	Acid Gas Injection System	Flow monitor data will be reduced to daily totals. Records of AGI system outages for maintenance or upset will be maintained. Any acid gas compressor downtime will be reported, as required.	No logs or records of AGI system outages for maintenance, upsets, or compressor downtime.	P278M1 A211; AGI and Flare CAM Plan	No logs or records of AGI system outages for maintenance, upsets, or compressor downtime.	Verified	Monitoring, recordkeeping and reporting processes implemented.	2/14/2023	Pre-acquisition	Complete required monitoring and maintain required records.	3/31/2023	3/31/2023
24	Red Hills Gas Plant	Acid Gas Flare (2.5-EP-5)	Flow rate should be within the operating velocities specified in NSPS Subpart A.	Flow rate and operating velocity compliance not being verified.	P278M1 A211; AGI and Flare CAM Plan	No logs or records of flow rate going to the flare in comparison to NSPS Subpart A operating velocity.	Verified	Verification processes have been implemented.	2/14/2023	Pre-acquisition	Derive required flare velocity and demonstrate compliance.	4/28/2023	4/12/2023
25	Red Hills Gas Plant	Acid Gas Flare (2.5-EP-5)	Records will be maintained of flare shutdown for any reason, including failure to deliver fuel, and of inspection and maintenance to the flare and flare pilot.	Flare shutdowns are currently not being tracked.	P278M1 A211; AGI and Flare CAM Plan	No records available of flare shutdowns.	Verified	Flare shutdowns are being tracked through Teams. Flaring/H2S/flare shutdowns are reported by ops to ESH.	2/14/2023	Pre-acquisition	Maintain required records.	2/28/2024	2/28/2024

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26	Red Hills Gas Plant	Thermal Oxidizers (EP-5, EP-6, EP-8)	The thermal oxidizer is inspected on a semi-annual basis to ensure that the process is properly controlled. The unit is inspected according to an NMED-approved inspection protocol which includes at minimum the methods for inspecting and adjusting proper minimum combustion temperature and proper air distribution.	Inspection protocol not submitted to NMED.	P278M1 A211; Amine, Dehy, & TO CAM Plan	Inspection protocol was not submitted to NMED.	Verified	Inspection protocol submitted.	2/14/2023	Pre-acquisition	Submit custom protocol to NMED for approval.	9/29/2023	9/28/2023
27	Red Hills Gas Plant	ECDs (EP-7 and EP-12)	Proper operation of the ECD shall be achieved by maintaining the non-combustion thermocouple with alarm system. Operators will record the date and result of each such maintenance activity, as well as repairs or replacements made.  Records will be maintained of ECD shutdown for any reason, including failure to deliver fuel, and of inspection and maintenance to the ECD.	No records of maintenance or repairs.  No records of ECD shutdowns.	P278M1 A211; Load and ECD CAM Plan	No records of maintenance or repairs are maintained.  No records are being kept for ECD shutdowns and the reason for shutdown along with inspection and maintenance records.	Verified	Records are being maintained in Maximo (system of record).  ECD shutdowns and maintenance events are being tracked in Maximo.	2/14/2023	Pre-acquisition	Maintain records of shutdowns, maintenance, and repairs.	6/30/2023	6/30/2023
28	Red Hills Gas Plant	ECDs (EP-7 and EP-12)	Temperature will be recorded automatically once per day with a data logger. Records will be available for review at the site.	Temperature measurements are not being recorded or logged.	P278M1 A211; Load and ECD CAM Plan	Thermocouple present and temperature can be checked by operators. Temperature measurements are not being recorded or logged.	Verified	Temperature measurements were initiated in January 2022, and data recording is in place.	2/14/2023	Pre-acquisition	Record temperature measurements as required.	7/31/2023	06/30/2023
29	Red Hills Gas Plant	Units 1-EP-1, 1.5-EP-1g, 2-EP-1a, 2-EP-1b, 3-EP-1a, 3-EP-1b, 4-EP-1a, 4-EP-1b, 4-EP-1g, 5-EP-1c, 5-EP-1d, 6-EP-1c, 6-EP-1d, 7-EP-1c and 7-EP-1d, & Reboiler Units 2-EP-1e, 2-EP-1h, 2a-EP-1d, 2.5-EP-1d, 3-EP-1d, 3-EP-1e, 3-EP-1h, 4-EP-1d, 4-EP-1e, 4-EP-1h, 5-EP-1a, 5-EP-1b, 5.5-EP-1a, 6-EP-1a and 6-EP-1b	(1) Compliance with the allowable emission limits in Table 106.A shall be demonstrated by performing annual inspections to ensure proper operation of the Unit. (2) At a minimum, the operational inspections shall meet those recommended by the manufacturer or shall meet the facility specific procedure submitted to the Department. (3) If the permittee is using a facility specific procedure it shall submit an electronic version of the procedure to the Department's Permit Section Manager within 90 days of implementing the procedure. If the plan cannot be submitted within 90 days, the permittee shall obtain written approval to extend the deadline from the Department's Permit Section, either by regular or electronic mail. The permittee shall provide additional information or make changes to the plan as requested by the Department. (4) The permittee shall make changes or improvements to the inspection procedure based on experience with the unit and/or new information provided by the manufacturer. This updated procedure shall be made available to the Department upon request.	Procedure not submitted to NMED. Update: Site has been following manufacturer procedures. Therefore, submittal of site-specific plan not required. However, annual records were not available for inspection.	P278M1 A204.C	Currently being completed with internal procedure. Internal procedure was not submitted to department. Update: Site is using manufacturer procedures. However, annual records were not available for inspection.	Verified	Using manufacturer procedure last several years. Maintenance records maintained in Maximo.	2/14/2023	Pre-acquisition	Submit custom site-specific plans to NMED for approval. Update: Submittal of custom plan not required. Maintain annual records of manufacturer-recommended maintenance performed.	6/30/2023	6/30/2023
30	Red Hills Gas Plant	Site	Annual Compliance Certification and Semi-Annual Title V Monitoring Report: All instances of deviations from permit requirements, including emergencies, must be clearly identified in such reports.	Deviations from monitoring permit requirements have not been fully or clearly represented.	P278M1 A 109, B110.B, C; 20.2.70.302.E NMAC	All deviations from permit conditions must be represented in the semi-annual monitoring and annual compliance reports.	Verified	All deviations included in the June 2023 report and submitted to NMED by the 07/14 deadline.	2/14/2023	Pre-acquisition	Comply with the reporting requirements in Part 70.302.E	7/14/2023	7/7/2023
31	Red Hills Gas Plant	Site	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	P278M1 B109	There have been recent improvements with recordkeeping requirements. However, records are not always available or complete for all requirements going back five years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	2/14/2023	Pre-acquisition	Consistency in keeping records for the required time period is needed. Set up systems to keep records with the required content and in the form required by the permit provision or regulation.	2/28/2024	2/28/2024
32	Red Hills Gas Plant	Train 5 HMO Heater (5-EP-1d)	Permitted capacity of unit is 17.55 MMBtu/hr	Name plate heating rate of unit is 24.75 MMBtu/hr	P278M1 A104.A	Maximum heating rate of unit not represented in permit.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	1/19/2023	Pre-acquisition	Update permit for maximum heating rate of unit.	Permit Revision Submittal:6/15/2024 (PSD Application)	
33	Red Hills Gas Plant	Reciprocating Compressors	Rod packing shall be replaced every 26,000 hours of operation or after 36 months.	Rod packing replacement for some compressors has not taken place within the required timeframe.	40 CFR Part 60.5415(c)(3) 40 CFR Part 60.5415a(c)(3)	Visual inspection of records during site visit indicate that some reciprocating compressors are overdue for rod packing replacement based on hours of operation.	Verified	Maintenance tasking maintained in Maximo.	2/22/2023	Pre-acquisition	Evaluate all compressors for current rod packing replacement timing and establish a system to notify operators when a replacement is required.	6/30/2023	6/9/2023
34	Red Hills Gas Plant	Reciprocating Compressors	Submit annual reports containing the information in 40 CFR Part 60.5420a(b)(1) and (4)	No compliant annual reports available to auditors.	40 CFR Part 65.5420(b)(4) 40 CFR Part 65.5420a(b)(4)	Annual reports with required information for reciprocating compressors were not available.	Verified	2022 annual reports were submitted, but not all elements were included. Complete reports will be submitted moving forward. The 2022 report was corrected and resubmitted.	2/22/2023	Pre-acquisition	Submit required report.	10/31/2023	7/31/2023
35	Red Hills Gas Plant	Reciprocating Compressors	Compliance records specified in 40 CFR Part 60.5420a(c)(3) for rod packing replacement are required to be kept for five years.	No compliant records or deviation reports were available.	40 CFR Part 60.5420(c)(3) 40 CFR Part 60.5420a(c)(3)	Compliant records for reciprocating compressors were not available.	Verified	Rodpacking replacements are being scheduled and tracked in Maximo. Records are being maintained in Maximo (system of record).	2/22/2023	Pre-acquisition	Maintain the required compliance records.	6/30/2023	6/23/2023
36	Red Hills Gas Plant	NSPS OOOO units	Submit notifications as required in 60.5420(a)(1).	No NSPS OOOO 60.7 notifications available to auditors.	40 CFR 60.5420(a)(1); 40 CFR Part 60.7(a)(1), (3); P278M1 A209.A, C	Initial notifications per 40 CFR Part 60.7 were not available for NSPS OOOO.	Verified	Notification work process implemented.	2/22/2023	Pre-acquisition	Submit the required notifications.	4/14/2023	4/20/2023
37	Red Hills Gas Plant	NSPS OOOOa units	Submit notifications as required in 60.5420(a)(1).	No NSPS OOOOa 60.7 notifications available to auditors.	40 CFR 60.5420a(a)(1); 40 CFR Part 60.7(a)(1), (3); P2781M1 A209.B, D	Initial notifications per 40 CFR Part 60.7 were not available for NSPS OOOOa.	Verified	Notification work process implemented.	2/22/2023	Pre-acquisition	Submit the required notifications.	4/14/2023	4/20/2023
38	Red Hills Gas Plant	H2S Sour Slop Tanks (2-T-1 and 2-T-2)	The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section.	No CAM Plan has been developed for these units.	40 CFR 64	No CAM plan has been developed for the Sour Slop Tanks (2-T-1 and 2-T-2).	Verified	Tank emissions will be re-evaluated as part of the permit revision.	2/14/2023	Pre-acquisition	Confirm applicability of CAM Plan requirement. Develop CAM Plan as applicable.	Permit Revision Submittal:6/15/2024 (PSD Application)	

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39	Red Hills Gas Plant	Boilers and Process Heaters	Comply with 40 CFR 63, Subpart MACT DDDDD	No record available to demonstrate that site is complying with standard, recordkeeping, or reporting requirements.	40 CFR 63 Subpart DDDDD; P278M1 A204, B106.C	Site is a major source of HAPs. Listed units are subject to MACT DDDDD.	Verified	Detailed evaluation of HAPs emissions will be completed as part of the PSD application.	2/22/2023	Pre-acquisition	Confirm MACT DDDDD applicability and comply as required.	Permit Revision Submittal:6/15/2024 (PSD Application)	
40	Red Hills Gas Plant	Flare Units	At least once per year during a blow down event, the permittee shall conduct a visible emissions observation in accordance with the requirements at 40 CFR 60, Appendix A, Reference Method 22.	No record of Method 22 specifically during a blow down event were available.	P278M1 A206.C	A Method 22 is required at least once per year during a blow down event for each flare.	Verified	Training complete and implemented record keeping process.	2/22/2023	Pre-acquisition	Train onsite personnel on Method 22 monitoring and schedule for at least one SSM event per year. Keep required records.	12/31/2023	12/31/2023
41	Red Hills Gas Plant	Flare Units	The permittee shall record all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare into normal operating conditions, and maintenance activities.	No compliant records were available.	P278M1 A206.C	Compliant records for flare alarms were not available.	Verified	Processes were installed to ensure flare alarms are recorded including date, cause, and actions taken.	2/22/2023	Pre-acquisition	Maintain the required compliance records.	2/28/2024	2/28/2024
42	Red Hills Gas Plant	Flare Units	Calibration: Records of all flowmeter and inline monitor certifications, calibrations, data capture calculations and documentation as specified by Condition B108.H, as well as any breakdowns, reasons for the breakdown, and corrective actions. The permittee shall also maintain a copy of the manufacturer specifications for operation and calibration or the site-specific operations and maintenance plan for flowmeters and inline monitors.	No compliant records were available.	P278M1 A206.D	Compliant records and maintenance plans were not available.	Verified	Manufacturer calibration check schedule is every 24 months. Calibration checks ongoing.  Finalizing validation/calibration schedule and plan.	2/22/2023	Pre-acquisition	Maintain the required compliance records.	2/28/2024	6/30/2023
43	Red Hills Gas Plant	ECD (EP-12)	To demonstrate compliance with the allowable emission limits in Table 106.A, the permittee shall perform an initial compliance test on the TO and ECD emissions stack.	No record of an initial source test for EP-12 was available.	P278M1 A206.F	An initial performance test for EP-12 was not available.	Verified	Tanks routed to EP-12 are currently idled.  The expected method of operation for the tank battery controlled by EP-12 has changed. Alternative controls for tank battery 3-T will be evaluated and installed as part of the PSD application.	2/22/2023	Pre-acquisition	Reevaluate tank emissions and control options.	Permit Revision Submittal:6/15/2024 (PSD Application)	
44	Red Hills Gas Plant	ECD and TO (EP-5, EP-6, EP-7, EP-8, EP-12)	Compliance with the allowable emission limits in Table 106.A shall be demonstrated by completing periodic emission tests on TO and ECD emissions stack.	2022 periodic tests were not performed.	P278M1 A206.G	Periodic compliance tests for ECD and TO units were not performed in 2022.	Verified	Testing has been completed for EP-5, EP-6, and EP-8.  The expected method of operation for the tank batteries controlled by EP-7 and EP-12 has changed. Alternative controls for tank batteries 1-T and 3-T will be evaluated and installed as part of the PSD application.	2/22/2023	Pre-acquisition	Complete periodic compliance tests moving forward.	Permit Revision Submittal:6/15/2024 (PSD Application)	
45	Red Hills Gas Plant	Heaters (1-EP-1, 1.5-EP-1g, 2-EP-1b, 3-EP-1b, 4-EP-1b, 4-EP-1g, 5-EP-1d, 6-EP-1d & Reboiler Units 2-EP-1h, 2a-EP-1d, 2.5-EP-1d, 3-EP-1d, 3-EP-1h, 4-EP-1d, 4-EP-1h, 5-EP-1a, 5-EP-1b, 6-EP-1a and 6-EP-1b)	The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup.	Complete notifications as required in NSPS Subpart Dc were not available.	40 CFR 60.48c(a); P278M1 A204.B	NSPS Dc specifies the requirements for notifications under 40 CFR 60.7. The site provided a site-wide notification for NSPS Dc rather than a notification for each unit.	Verified	notification work process implemented.	2/22/2023	Pre-acquisition	Submit notifications as required.	5/31/2023	5/3/2023
46	Red Hills Gas Plant	Site	After receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date.	Serial numbers of some equipment reflected in the permit do not match the equipment present on site.	B110.B-2	Serial numbers of some equipment were not accurately reflected in the permit and were not updated after initial startup of each new or modified source.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	2/22/2023	Pre-acquisition	Submit permit revision to properly represent serial numbers.	Permit Revision Submittal: 2/28/2024 (Admin Revision)	2/28/2024
47	Red Hills Gas Plant	FUG	Provide all information, including all calculations and computations, to describe the specific chemical and physical nature and to estimate the maximum quantities of any regulated air contaminants the source will emit through routine operations after construction, modification or installation is completed, and estimate maximum potential emissions during malfunction, startup, shutdown.	Fugitive counts at the facility appear to be underrepresented.	20.2.72.203 NMAC	Based on experience at other gas plants, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.		Pre-acquisition	Submit permit revision.	Permit Revision Submittal:6/15/2024 (PSD Application)	
48	Red Hills Gas Plant	Site	A significant permit revision is required for any modification to a source, and for revisions to any term or condition of such permit, including but not limited to emissions limitation, control technology, operating conditions, and monitoring requirements;	Trinity noted disparities between the latest NSR Permit #4310M5 and Title V Permit #278M1.	20.2.72.219D(1) NMAC	Trinity noted disparities between the latest NSR Permit #4310M5 and Title V Permit #278M1. These disparities will need to be addressed as part of the NSR True-Up application.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.		Pre-acquisition	Submit permit revision.	Permit Revision Submittal:6/15/2024 (PSD Application)	

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49	Red Hills Gas Plant	5.5-EP-1b	The contents of a permit application specifically identified by the Department shall become the terms and conditions of the permit or permit revision. Unless modified by conditions of this permit, the permittee shall construct or modify and operate the Facility in accordance with all representations of the application and supplemental submittals that the Department relied upon to determine compliance with applicable regulations and ambient air quality standards. If the Department relied on air quality modeling to issue this permit, any change in the parameters used for this modeling shall be submitted to the Department for review.	The unit installed has stack and operating parameters that differ from what was permitted.	B101.A	The unit that was installed is 145 feet tall instead of 300 feet as represented in the model, and the unit will have a different effective diameter for facility-specific operating conditions than was previously represented and modeled. The permit represented 122.64 hours of acid gas flaring, but only 61.32 hours of assist gas flaring was represented.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/12/2023	Pre-acquisition	Submit permit revision with updated flare stack and operating parameters.	Permit Revision Submittal:6/15/2024 (PSD Application)	
50	Red Hills Gas Plant	Facility	A compliance demonstration based on US EPA approved modeling or analysis, including all pertinent calculations and computations, for all applicable requirements of 20.2.72.300 NMAC - 20.2.72.399 NMAC for any facility electing to obtain a permit under 20.2.72.300 NMAC - 20.2.72.399 NMAC;  "Ambient air" means the outdoor atmosphere, but does not include the area entirely within the boundaries of the industrial or manufacturing property within which the air contaminants are or may be emitted and public access is restricted within such boundaries.  The act of repositioning or relocating sources of air emissions or emissions points within the plant site is only permissible when such change in physical configuration does not increase air emissions or the ambient impacts of such emissions.	Modeling completed for the previous permit application had an incorrect representation of the facility's boundary.  The equipment was not built in the location represented in the modeling submitted for NSR Permit #4310M5.	20.2.72.302.A(11) NMAC, 40 CFR § 50.1(e), 20.2.72.202.B(4) NMAC	Modeling completed for the previous permit application had an incorrect representation of the facility's boundary. Combustion emission sources are closer to the fence line than represented in the most recent modeling submitted to the NMED. Therefore, modeling will require updates.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/12/2023	Pre-acquisition	Submit permit revision with updated property boundary and equipment locations.	Permit Revision Submittal:6/15/2024 (PSD Application)	
51	Red Hills Gas Plant	5.5-EP-1b	The contents of a permit application specifically identified by the Department shall become the terms and conditions of the permit or permit revision. Unless modified by conditions of this permit, the permittee shall construct or modify and operate the Facility in accordance with all representations of the application and supplemental submittals that the Department relied upon to determine compliance with applicable regulations and ambient air quality standards. If the Department relied on air quality modeling to issue this permit, any change in the parameters used for this modeling shall be submitted to the Department for review.	The wrong emission factor for CO was utilized.	B101.A	The previous permitting of this unit utilized the CO emission factor for a high BTU (>1,000) stream to calculate emissions from a low BTU (<1,000) stream, resulting in lower CO emissions than are expected from this unit.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/12/2023	Pre-acquisition	Submit permit revision with updated CO emission factor.	Permit Revision Submittal:6/15/2024 (PSD Application)	
52	Red Hills Gas Plant	Facility	If a source or modification becomes a major stationary source or major modification solely due to a relaxation in any enforceable limitation (which limitation was established after August 7, 1980), on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then this part shall apply to the source or modification as though construction had not yet commenced.	Based on review of the previously issued permits, the facility is subject to PSD permitting.	20.2.74.300.D NMAC, 40 CFR 52.21(r)(4)	The facility is subject to PSD permitting.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/12/2023	Pre-acquisition	Submit updated permit application.	Permit Revision Submittal:6/15/2024 (PSD Application)	
53	Red Hills Gas Plant	EP-5 and EP-8 5-EP-2, 7-EP-2, 2.5-EP-5, EP-9, EP-10, EP-13  Haul Roads Pigging 1-T and 3-T EP-5, EP-8	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	The thermal oxidizers currently do not have permitted downtime.  The units were permitted with pilot, assist, or sweep gas that was lower than what is required to operate.  Currently permitted haul roads for condensate loadout are currently assuming use of an inaccessible road, which is no longer in service.  Pigging units are permitted as regulated sources but no associated emissions are permitted.  The representation for each set of tanks in the previous application was in parallel, but tanks operate in series.  The units installed have a greater heat input than what the units were permitted for.	20.2.72.200 NMAC, NSR B110.C	Although the thermal oxidizers experience routine and predictable downtime events, no downtime is permitted for the units.  The units were not permitted for enough fuel input through pilot, assist, or sweep gas.  Currently permitted haul roads for condensate loadout are assuming use of a road which is no longer in service.  Pigging units are permitted as regulated sources but no associated emissions are permitted.  The representation for each set of tanks in the previous application was in parallel, but tanks operate in series.  The units was permitted as having a 28 MMBtu/hr capacity, but larger units were installed.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/12/2023	Pre-acquisition	Submit permit revision.	Haul Roads and Pigging Permit Revision Submittal: 3/17/2024 (Significant Revision)  Permit Revision Submittal: 6/15/2024 (PSD Application)	
54	Red Hills Gas Plant	Facility	If a source or modification becomes a major stationary source or major modification solely due to a relaxation in any enforceable limitation (which limitation was established after August 7, 1980), on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then this part shall apply to the source or modification as though construction had not yet commenced.	AGI Train 2 was permitted at a specified throughput limit based on an assumed H2S concentration, but is capable of processing higher gas flow rates dependent on the inlet H2S concentration.	20.2.74.300.D NMAC, 20.2.72.200 NMAC, 40 CFR 50.21(r)(4)	AGI Train 2 has the capability to process higher gas flow rates dependent on the inlet H2S concentration. Appropriate permitting must occur prior to the start of construction of a source.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/12/2023	Pre-acquisition	Submit updated permit application.	Permit Revision Submittal: 2/29/2024 (Tech Rev)	1/8/2024

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1	Frac Cat CS	Heater Trailer	"Construction" means fabrication, erection, installation or relocation of a stationary source, including but not limited to temporary installations and portable stationary sources.	Diesel-fired heater trailer present at facility and not included in permit. Records indicating diesel fuel is ultra low sulfur diesel are not being kept.	20.2.72.200.F NMAC	Heater trailer, which is used for the compressors, is present at the facility. This unit is not included in the permit.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	4/4/2023	Pre-acquisition	Submit a permit revision to properly represent heater trailer.	Permit Revision: 3/15/2024 (NSR to GCP Conversion)	
2	Frac Cat CS	Engines: Units 17-0533, 17-0530, 17-0529, 17-0590, 17-0585, 18-1279, 3, and 4	Monitoring: The permittee shall test using a portable analyzer or EPA Reference Methods. Testing frequency shall be once per quarter.	No compliant records for fourth quarter tests or semiannual formaldehyde testing.	A201.B 40 CFR 63.6603	Records were not available to demonstrate compliance with Q4 2022 testing or semiannual formaldehyde testing.	Verified	Quarterly/semi-annual testing is scheduled for July and will be conducted, documented, and reported as required going forward.	4/4/2023	Pre-acquisition	Perform quarterly or semiannual testing as required.	7/31/2023	7/31/2023
3	Frac Cat CS	Dehy-1	Monitoring: The permittee shall conduct an annual GRI-GlyCalc analysis using the most recent extended gas analysis, and verify the input data. The permittee may use a method of calculating dehydrator emissions other than the most current version of GRI-GlyCalc if approved by the Department. Changes in the calculated emissions due solely to a change in the calculation methodology shall not be deemed an exceedance of an emission limit.	Annual ProMax calculations are completed but are not representative of operations on site based on site visit.	A202.A	On site, flash tank emissions are rerouted to the facility inlet and the BTEX condenser overheads are routed to the reboiler. The annual ProMax completed to demonstrate compliance with the requirement in the permit does not reflect this.	Verified	ProMax calculations were updated to accurately reflect facility process flow.	4/4/2023	Pre-acquisition	Update ProMax calculation to accurately reflect facility process flow.	6/16/2023	4/25/2023
4	Frac Cat CS	RBL-3	(2) At a minimum, the operational inspections shall meet those recommended by the manufacturer or shall meet the facility specific procedure submitted to the Department. (3) If the permittee is using a facility specific procedure it shall submit an electronic version of the procedure to the Department's Permit Section Manager within 90 days of implementing the procedure. If the plan cannot be submitted within 90 days, the permittee shall obtain written approval to extend the deadline from the Department's Permit Section, either by regular or electronic mail. The permittee shall provide additional information or make changes to the plan as requested by the Department. (4) The permittee shall make changes or improvements to the inspection procedure based on experience with the unit and/or new information provided by the manufacturer. This updated procedure shall be made available to the Department upon request.(NSR 4221M6, Condition A204A).  Monitoring: (1) Inspections shall be completed at least once per year or at the frequency recommended by the manufacturer. (2) At a minimum, inspections shall include the following: (a) checking indicators to verify that the optimal amount of excess combustion air is introduced into the boiler combustion process such as a blue colored, steady flame; (b) inspections of the unit(s) components and housing for cracks or worn parts.	Records of operational inspections were available. However, the inspections are not based on manufacturer recommendations, but are based on a Targa-specific procedure. This inspection procedure has not been approved by the NMED within 90 days of implementing the procedure.  Inspections are taking place, but do not specifically address the required permit monitoring conditions.	A204.A	A procedure for inspection is in place, but does not meet the requirements of this condition.  Inadequate inspection documentation for unit. Records of inspection occurrence are available but do not demonstrate compliance with the monitoring requirements listed in the permit.	Verified	Targa has submitted a facility specific procedure.	4/4/2023	Pre-acquisition	Update procedure for inspection.	11/30/2023	11/30/2023
5	Frac Cat CS	Flare-1	Monitoring: (1) Flare Pilot Flame: The permittee shall continuously monitor the presence of a flare pilot flame using a thermocouple or any equivalent device approved by the Department and shall be equipped with a continuous recorder and alarm or equivalent, to detect the presence of a flame.  Recordkeeping: (1) Flare Pilot Flame: The permittee shall record all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare into normal operating conditions, and maintenance activities.	Flare is equipped with thermocouple, but not with continuous recorder or alarm.  Records of alarm activation were not available.	A206.A	Flare is equipped with a thermocouple but data is not being logged or recorded.  Records of alarm activation were not available.	Verified	Flare was equipped with a recorder and tied into SCADA system with alarms.  Created flare log and process to record required information.	4/4/2023	Pre-acquisition	Install continuous data recorder or alarm. Maintain the required compliance records.	6/30/2023	6/30/2023
6	Frac Cat CS	Flare-1	(2) Maintain a copy of the manufacturer's maintenance recommendations. (3) The SCADA system shall record the time the pilot is down along with any flow to the flare during that time.	No manufacturer's maintenance recommendations were available and no records were available for pilot downtime and flow rate monitoring.	A206.B	Targa needs to acquire a copy of the manufacturer's maintenance recommendations. No recordkeeping was available for pilot downtime or flow to the flare during the downtime.	Verified	Record keeping process implemented.	4/4/2023	Pre-acquisition	Obtain manufacturer recommendations and ensure custom checklist incorporates those procedures.	7/31/2023	7/7/2023
7	Frac Cat CS	Flare-1	Monitoring: The permittee shall determine a combustion temperature that achieves the required destruction efficiency from periodic emissions testing performed in accordance with A208.D and monitor the burning temperature of the flare continuously and record the temperature once per 24-hour period. Compliance with this condition is defined as operating with temperatures within +/- 2% of the combustion temperature during the emissions test.  Monitoring: The permittee shall perform an initial compliance test in accordance with the General Testing Requirements of Section B111. Emission testing is required for NOx, CO, and VOCs.	Thermal oxidizer language carried forward in permit; no periodic emissions testing being completed at flare because this is not possible.  No initial compliance test for flare because this is not possible with a flare.	A208.C A208.D	Periodic emissions testing not possible for a flare. Permit condition requires such testing.  Condition cannot be complied with. Initial compliance tests not possible for flares.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	4/4/2023	Pre-acquisition	This permit provision will require updating, as it is not achievable in practice. Targa will provide suggested language as part of the NSR True-Up application.	Permit Revision: 3/15/2024 (NSR to GCP Conversion)	
8	Frac Cat CS	Facility	Provide all information, including all calculations and computations, to describe the specific chemical and physical nature and to estimate the maximum quantities of any regulated air contaminants the source will emit through routine operations after construction, modification or installation is completed, and estimate maximum potential emissions during malfunction, startup, shutdown.	SSM and M activities not identified and quantified in the permit.	20.2.72.203(3) NMAC	SSM and M activities are not specified and quantified in permit.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	4/4/2023	Pre-acquisition	Submit a permit revision to incorporate quantified SSM and M activities.	Permit Revision: 3/15/2024 (NSR to GCP Conversion)	

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9	Frac Cat CS	RBL-3 T4 Methanol Tanks	All sources of air contaminant emissions must be authorized by some appropriate permitting mechanism.	Reboiler is permitted at 21 MMBtu/hr but nameplate rating is 25.2 MMBtu/hr. T4 is permitted as a 300 bbl condensate tank but is actually a 210 bbl produced water tank. Methanol Tanks except one at the site have not been previously represented in permit application forms.	20.2.72.200 NMAC	Unit was permitted for heat absorbed rather than heat released which underestimated the PTE. It is unknown if permitted duty was actually exceeded. Unit was permitted for the incorrect size and liquid category. Unit was permitted for the incorrect size and liquid category.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	4/25/2023	Pre-acquisition	Submit permit revision.	Permit Revision: 3/15/2024 (NSR to GCP Conversion)	
10	Frac Cat CS	Pneumatic Controllers	Each pneumatic controller affected facility at a location other than at a natural gas processing plant must be tagged with the month and year of installation, reconstruction or modification, and identification information that allows traceability to the records for that controller as required in § 60.5420a(c)(4)(iii).	No compliant records available for natural gas driven pneumatic controllers.	40 CFR 60.5390a (OOOa)	No compliant records available for natural gas driven pneumatic controllers.	Verified	Record keeping process implemented.	4/25/2023	Pre-acquisition	Maintain required compliance records.	2/28/2024	1/30/2024
11	Frac Cat CS	Fugitives	Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.	No compliant records available for fugitive resurveying.	40 CFR 60.5397a(h)(4)	No compliant records available for fugitive resurveying.	Verified	Monthly surveys began in October 2022.	4/25/2023	Pre-acquisition	Maintain required compliance records.	6/30/2023	10/19/2022
12	Frac Cat CS	Engines	The owner or operator of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. All required measurements needed to demonstrate compliance with a relevant standard (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report).	No compliant records available for CMS data.	40 CFR 63.10(b)(2)(vii) and A201.F	No compliant records available for continuous monitoring of catalyst inlet temperature and measurement of monthly dP for compliance demonstration.	Verified	Targa installed sensors to continuously record temperature data and hardware for monthly delta P measurements.	4/25/2023	Pre-acquisition	Start recording continuous pressure and temperature readings.	7/31/2023	8/21/2023
13	Frac Cat CS	Engines	The owner or operator of an affected source must notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin to allow the Administrator, upon request, to review an approve the site-specific test plan required under paragraph (c) of this section and to have an observer present during the test.	/	40 CFR 63.7(b)(1)	No records indicating Targa notified the Administrator if intent to perform compliance test.	Verified	Notification submitted prior to next performance test.	4/25/2023	Pre-acquisition	Submit notifications for future performance tests.	5/12/2023	5/19/2023
14	Frac Cat CS	Engines	If you start up your new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions on or after August 16, 2004, you must submit an Initial Notification not later than 120 days after you become subject to this subpart.	No compliant records available for initial startup notification.	40 CFR 63. 6645(c)	No records available for initial startup notification for engines at facility.	Verified	notification work process implemented	4/25/2023	Pre-acquisition	Submit initial startup notification.	6/30/2023	6/30/2023
15	Frac Cat CS	DEHY-1	To demonstrate compliance with the allowable VOC emission limits in Table 106.A, the unit's inlet gas stream shall not exceed 35 MMscf/day. The permittee shall maintain a flow meter that measures the flow rate of gas into or out of the dehydrator.	The 35 MMscf/day limit was exceeded 25 days during March, 2023.	A202.E	Records of daily gas throughput indicated that the inlet gas stream to DEHY-1 was exceeded 25 times in March 2023.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	4/28/2023	Pre-acquisition	Submit permit revision to increase inlet gas throughput for DEHY-1.	Permit Revision: 3/15/2024 (NSR to GCP Conversion)	
16	Frac Cat CS	RBL-3	The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup.	Complete notifications as required in NSPS Subpart Dc were not available.	A204.C	NSPS Dc specifies the requirements for notifications under 40 CFR 60.7.	Verified	notification work process implemented	4/28/2023	Pre-acquisition	Submit NSPS Dc notification.	6/30/2023	6/30/2023
17	Frac Cat CS	RBL-1, RBL-2, RBL-3	If you are required to meet an applicable tune-up work practice standard, you must conduct an annual, biennial, or 5-year performance tune-up according to § 63.7540(a)(10), (11), or (12), respectively.	Required DDDDD tune-ups were not completed.	A204.D	DDDDD tune-ups were not completed as specified in 40 CFR Subpart DDDDD.	Verified	Testing complete. RBL-2 has not been constructed.	4/28/2023	Pre-acquisition	Complete DDDDD tune-ups during the next reporting period.	09/29/23	9/9/2023
18	Frac Cat CS	Engines: 585, 1279, 3 (3107), 4 (3108), 2 (3342)	Rod packing shall be replaced every 26,000 hours of operation or after 36 months.	Rod packing replacement for some compressors may not have taken place within the required timeframe.	40 CFR Part 60.5415(c)(3) 40 CFR Part 60.5415a(c)(3)	Records indicate that some rod packing replacements may not have occurred within the required timeframe.	Verified	Rod packing replacements managed in Maximo.	4/28/2023	Pre-acquisition	Complete rod packing changes.	6/30/2023	6/30/2023
19	Frac Cat CS	Flare-1	Thermocouple and/or equivalent device visually checked quarterly, and the alarm tested twice per year. Pilot flame is constantly monitored using a thermocouple or infrared (IR) device as approved by the Division.	Failed to conduct semi-annual test of pilot alarm and failed to conduct flow meter calibration. Flare is equipped with a thermocouple but data is not being logged or recorded. Records of alarm activation were not available.	A800 (CAM Plan)	Semi-annual test of pilot alarm and flow meter calibration were not completed. No data is being recorded from thermocouple.	Verified	Scheduled and documented in Maximo.	4/28/2023	Pre-acquisition	Begin conducting semiannual testing of the pilot alarm. Install continuous data recorder or alarm and maintain the required compliance records.	6/30/2023	6/30/2023
20	Frac Cat CS	Flare-1	The permittee shall maintain records including the date and time of each temperature reading, detail any deficiencies in operation identified, and record any corrective actions taken to restore the control device to operation.	No compliant records available for temperature reading data.	A208.C	Records were not being kept of temperature reading data.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	4/28/2023	Pre-acquisition	This permit provision will require updating, as it relates to thermal oxidizers. Targa will provide suggested language as part of the NSR True-Up application.	Permit Revision: 3/15/2024 (NSR to GCP Conversion)	

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21	Frac Cat CS	DEHY-1 and DEHY-2	Standards, monitoring, recordkeeping, and reporting requirements for new large dehydrators at a HAP major source.	Comply with MACT HH requirements for new large TEG dehydrators located at a HAP major source.	MACT Subpart HH; P288 A202.D, B106.C	Application incorrectly claims that units are subject to 63.764(e)(1)(ii), but units are located at a Major Source.	Verified	Based on equipment installed the site is not exceeding MACT Major status. The facility permit will be revised to reduce HAP allowable emissions below MACT major source thresholds.	4/28/2023	Pre-acquisition	Comply with MACT HH requirements for new large TEG dehydrators at a HAP major source.	Permit Revision: 3/15/2024 (NSR to GCP Conversion)	
22	Frac Cat CS	T1 through T3	<p>The closed-vent system shall route all gases, vapors, and fumes emitted from the material in an emissions unit to a control device that meets the requirements specified in paragraph (d) of this section.</p> <p>The closed-vent system shall be designed and operated with no detectable emissions.</p> <p>Except as provided in paragraphs (c)(5) and (6) of this section, each closed-vent system shall be inspected according to the procedures and schedule specified in paragraphs (c)(2)(i) and (ii) of this section, each cover shall be inspected according to the procedures and schedule specified in paragraph (c)(2)(iii) of this section, and each bypass device shall be inspected according to the procedures of paragraph (c)(2)(iv) of this section</p> <p>Records identifying all parts of the cover or closed-vent system that are designated as unsafe to inspect in accordance with § 63.773(c)(5), an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment.</p> <p>Records identifying all parts of the cover or closed-vent system that are designated as difficult to inspect in accordance with § 63.773(c)(6), an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment.</p> <p>For each inspection conducted in accordance with § 63.773(c), during which a leak or defect is detected, a record of the information specified in paragraphs (b)(7)(i) through (b)(7)(viii) of this section.</p> <p>For each inspection conducted in accordance with § 63.773(c) during which no leaks or defects are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks or defects were detected.</p> <p>The owner or operator of an affected source subject to this subpart shall maintain records of the occurrence and duration of each malfunction of operation (i.e., process equipment)</p>	The tanks at the facility do not have a closed-vent system or a control in place.	<p>40 CFR 63.771(c)(1)</p> <p>40 CFR 63.773(c)</p> <p>40 CFR 63.774(b)5 &amp; 6</p> <p>40 CFR 63.774(b)7 &amp; 8</p> <p>40 CFR 63.774(g)</p>	<p>The tanks at the facility are uncontrolled, but a control is required to comply with 40 CFR 63 Subpart HH.</p> <p>The tanks at the facility are permitted for their uncontrolled emissions and have no installed controls.</p>	Verified	Based on equipment installed the site is not exceeding MACT Major status. The facility permit will be revised to reduce HAP allowable emissions below MACT major source thresholds.	4/28/2023	Pre-acquisition	Submit permit revision and install control device for the tanks, complete required inspections, maintain records for inspection, including parts that are designated as difficult to inspect, and maintain compliant records of malfunctions.	Permit Revision: 3/15/2024 (NSR to GCP Conversion)	

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1	Big Lizard	Facility	The permittee shall perform a facility inlet gas analysis once every year. On a monthly basis, the permittee shall complete the following monitoring and recordkeeping to demonstrate compliance with the allowable emission limits in Table 107.A for routine or predictable startup, shutdown, and maintenance (SSM); and/or malfunctions (M) herein referred in accordance with 20.2.7 NMAC. to as SSM/M.	No compliant records prior to 2022.	A107.C	Extended analyses are completed annually now. Inlet analysis was not being completed prior to 2022.	Verified	Extended analysis performed annually.  Rolling 12 month emission recordkeeping work process implemented.	4/4/2023	Pre-acquisition	Keep compliant records going forward.	6/16/2023	6/16/2023
2	Big Lizard	18-339	Monitoring: The units shall be operated with the catalytic converter, which includes catalyst maintenance periods. During periods of catalyst maintenance, the permittee shall either (1) shutdown the engine(s); or (2) replace the catalyst with a functionally equivalent spare to allow the engine to remain in operation.	An engine at the facility was operating without a functioning catalyst. There was a break in the exhaust piping prior to the catalyst, so a portion of engine exhaust was not routed to the catalyst.	A201.C	An engine on site had a break in the exhaust prior to the catalyst, so emissions from the unit were being released to the atmosphere instead of routed to the catalyst.	Verified	Entire exhaust manifold replaced.	4/4/2023	Pre-acquisition	Repair catalyst exhaust piping or shutdown unit.	N/A	2/28/2023
3	Big Lizard	Units T-1, T-2, T-3, T-4 LOAD	Monitoring: The permittee shall monitor the monthly total throughput once per month. Monitoring: The permittee shall monitor the condensate truck loadout volume on a monthly basis.	Throughput rolling total is only being monitored semiannually.	A203.A A203.B	The throughput rolling total is not being calculated each month. Data is only being collected when preparing a semiannual report. Records go back to August 2021.	Verified	rolling 12-month tracking spreadsheet implemented	4/4/2023	Pre-acquisition	Update throughput spreadsheet on an ongoing basis for each calendar month.	6/16/2023	6/16/2023
4	Big Lizard	Units RBL-1, RBL-2, RBL-3, AURB1, AU-RB2	If the permittee is using a facility specific procedure it shall submit an electronic version of the procedure to the Department's Permit Section Manager within 90 days of implementing the procedure. If the plan cannot be submitted within 90 days, the permittee shall obtain written approval to extend the deadline from the Department's Permit Section, either by regular or electronic mail. The permittee shall provide additional information or make changes to the plan as requested by the Department.	Records of operational inspections were available. However, the inspections are not based on manufacturer recommendations, but are based on a Targa-specific procedure. This inspection procedure has not been approved by the NMED within 90 days of implementing the procedure.	A204.A	A procedure for inspection is in place, but does not meet the requirements of this condition.	Verified	Targa has submitted a facility specific procedure.	4/4/2023	Pre-acquisition	Obtain manufacturer recommendations and ensure custom checklist incorporates those procedures	11/30/2023	11/30/2024
5	Big Lizard	Units RBL-1, RBL-2, RBL-3, AURB1, AU-RB2	(1) Inspections shall be completed at least monthly or at the frequency recommended by the manufacturer. (2) At a minimum, inspections shall include the following: (a) checking indicators to verify that the optimal amount of excess combustion air is introduced into the boiler combustion process such as a blue colored, steady flame; (b) inspections of the unit(s) components and housing for cracks or worn parts.	Heater inspections do not address the required inspection components.	A204.A	Heater inspection is general in nature and does not directly address specific items required to be inspected by the permit.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	4/4/2023	Pre-acquisition	Update procedure for inspection. Submit permit revision to align inspection frequency with other NMED issued permits.	Permit Revision: 5/15/2024 (Significant Revision)	
6	Big Lizard	Units AU-RB1 and AU-RB2	The unit is subject to 40 CFR 60, Subpart Dc and the permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A and Subpart Dc.	No compliant records of initial notification.	A204.B 40 CFR 60.48c	No initial notification for the boilers was completed under 40 CFR 60 Subpart Dc.	Verified	initial notification work process implemented	4/4/2023	Pre-acquisition	Submit initial notification for boilers subject to 40 CFR 60 Subpart Dc.	6/16/2023	5/19/2023
7	Big Lizard	FL-1	The permittee shall continuously monitor the presence of a flare pilot flame using a thermocouple or any equivalent device approved by the Department and shall be equipped with a continuous recorder and alarm or equivalent, to detect the presence of a flame.  The permittee shall record all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare into normal operating conditions, and maintenance activities.	Flare is equipped with thermocouple, but not with continuous recorder or alarm.  Records of alarm activation were not available.	A206.A	Flare is equipped with a thermocouple but data is not being logged or recorded.  Records of alarm activation were not available.	Verified	Flare thermocouple and continous recorder were installed and connected to SCADA.	4/4/2023	Pre-acquisition	Install continuous data recorder or alarm. Maintain the required compliance records.	6/30/2023	6/29/2023
8	Big Lizard	Unit FL-1 and Amine Reboilers AU-RB1 and AU-RB2 Controlling AU-1	1) The permittee shall record the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the units into compliance. 2) The permittee shall maintain a copy of the manufacturer's maintenance recommendations.	No compliant records of manufacturer's recommendations.	A208.A	No records of manufacturer's recommendations.	Verified	work process implemented to ensure compliance	4/4/2023	Pre-acquisition	Obtain manufacturer recommendations and ensure custom checklist incorporates those procedures	7/31/2023	7/31/2023
9	Big Lizard	AU-1 and associated control FL-1	Monitoring: The permittee shall monitor the following indicators according to the approved CAM Plan in Section C103 and pursuant to 40 CFR 64.3(a) and (b): the presence of pilot flame, presence of visible emissions, and totalized flow volume. The permittee shall continue the monitoring pursuant to 40 CFR 64.7. The permittee shall comply with the measurement approach, performance criteria, and defined excursion for each indicator range or condition that is described in the approved CAM Plan in Section C103 (40 CFR 64.6(c)). The frequency of data collection shall be at least once every 24 hours per 40 CFR 64.3(b)(4)(i) and (iii). The permittee shall respond to any excursion of indicator range or condition in accordance with the CAM Plan and 40 CFR 64.7(d).	No compliant records of alarm activation. No compliant records of corrective action or maintenance for control device.	A800.A	Thermocouple is present but no there is no continuous recorder or alarm. Alarm is present at the facility, but alarm activation is not sent anywhere or recorded. No records were available of corrective action being taken for repair or maintenance.	Verified	record keeping work process implemented	4/4/2023	Pre-acquisition	Maintain the required compliance records. Maintain records of corrective action for repair or maintenance.	6/16/2023	6/30/2023
10	Big Lizard	Facility	Provide all information, including all calculations and computations, to describe the specific chemical and physical nature and to estimate the maximum quantities of any regulated air contaminants the source will emit through routine operations after construction, modification or installation is completed, and estimate maximum potential emissions during malfunction, startup, shutdown.	SSM and M activities not identified and quantified in the permit.	20.2.7.203(3) NMAC	SSM and M activities are not specified and quantified in permit.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	4/4/2023	Pre-acquisition	Submit a permit revision to incorporate quantified SSM and M activities.	Permit Revision: 5/15/2024 (Significant Revision)	

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11	Big Lizard	Fugitives	Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.	No compliant records available for fugitive resurveying.	40 CFR 60.5397a(h)(4)	No compliant records available for fugitive resurveying.	Verified	Monthly surveys began in October 2022.	4/25/2023	Pre-acquisition	Maintain required compliance records.	6/30/2023	10/19/2022
12	Big Lizard	Facility	If a facility is subject to a MACT standard in 40 CFR 63, then the facility is subject to the requirement for a Startup, Shutdown and Malfunction Plan (SSM) under 40 CFR 63.6(e)(3), unless specifically exempted in the applicable subpart	No compliant SSM plan available.	NSR Permit No. 7960-M2 B106.C	No SSM Plan available for facility.	Verified	SSM plan developed	4/25/2023	Pre-acquisition	Develop SSM plan for facility.	6/30/2023	5/30/2023

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1	Greyhound Compressor Station	TK-1 and TK-2 Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.  The Facility shall operate as specified in the Registration Form. The emission limits and equipment specified in the Registration Form are federally enforceable, and shall become the terms and conditions of this Permit.	Tanks are permitted at a 300 bbl capacity. Tanks located at site have a 400 bbl capacity.  Fugitives are underrepresented in current permit.  Tank emissions are underrepresented in the current permit.	20.2.72.200 NMAC  A100.F	Incorrect tank size is permitted.  Based on experience at other compressor stations, the fugitive counts may be low.  Based on a review of the GCP-O&G permit and associated registration and documents, the permitted values for tank emissions are currently underrepresented due to the incorrect tank count representation.	Verified	permit revision submitted.	5/9/2023	Pre-acquisition	Submit permit revision.	Permit Revision To Be Filed: 5/17/2023	5/17/2023
2	Greyhound Compressor Station	ENG-1, 19-286, ENG-4, ENG-5, ENG-8, ENG-9	Facilities with a PER greater than 80 tpy of any regulated air pollutant shall perform periodic testing once per calendar year for each engine and turbine > 180 hp. For annual testing, the first test shall occur within the twelve months after permit issuance. All subsequent monitoring events for engines and turbines shall occur no later than one year from the previous event. For 3-year testing, the first test shall occur within 36 months after permit issuance, and at least once per 36-month period thereafter. The permittee shall follow the General Testing Procedures of Section B111.	Complete records of compliance testing not available.	A202.D	Complete records not available for engine periodic testing within the past two years.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	7/6/2023	Pre-acquisition	Complete periodic compliance test and maintain records.	2/28/2024	11/6/2023
3	Greyhound Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision submitted to align permitted representations with planned operations.	7/6/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	2/28/2024	5/17/2023
4	Greyhound Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.  (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	7/6/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
5	Greyhound Compressor Station	ENG-1, 19-286, ENG-4, ENG-5, ENG-8, ENG-9	For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.  NSPS JJJJ  Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.	Site has not kept consistent records with many of the requirements of JJJJ.	A202.F  40 CFR 60 Subpart JJJJ  40 CFR 60.4245(d)	Complete records were not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.  Complete records are not available for requirements going back two years.  Complete records were not available of submittal of performance testing.	Verified	Targa submitted initial NSPS JJJJ notifications.  Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Complete initial notification and comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	Initial Notification: 2/23/2024 Performance Testing: 11/6/2023
6	Greyhound Compressor Station	ENG-1, 19-286, ENG-4, ENG-5, ENG-8, ENG-9	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	7/6/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024

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7	Greyhound Compressor Station	Dehy-1 and Dehy-2	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1)	Records were unavailable of site specific extended gas analyses; no records of annual GlyCalc model inputs or results using the site specific analysis were available.	A204.B, 40 CFR 63.772(b)(2)(i)	No annual extended analysis was completed at the dehydrator inlet for this site going back two years. Records unavailable for previous two years of extended annual gas analyses and calculated emissions.	Verified	Going forward Targa will acquire an annual site specific sample to complete emission calculations.	9/27/2023	Pre-acquisition	Complete annual extended analysis at the dehydrator inlet and maintain records. Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
8	Greyhound Compressor Station	TK-1 and TK-2	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision was submitted to increase inlet separator pressure to align with planned operations.	9/27/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	9/30/2023	5/17/2023
9	Greyhound Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plan developed.	7/6/2023	Pre-acquisition	Develop and implement SSM plan for facility.	N/A	9/7/2023
10	Greyhound Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	7/6/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
11	Greyhound Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.7.2.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa submitted startup/production rate notifications.	7/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
12	Greyhound Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	No records of AQB notifications for compliance tests.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	7/6/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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13	Greyhound Compressor Station	Facility	<p>NSPS OOOOa Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(ii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.</p> <p>Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.</p> <p>Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).</p>	Site has not kept consistent records with many of the requirements of OOOOa.	<p>40 CFR 60 Subpart OOOOa</p> <p>40 CFR 60.5420a(c)(4)(i)-(iii),(v)</p> <p>40 CFR 60.5420a(c)(3)(ii)</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of resurveying of identified fugitive emissions.</p> <p>Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.</p> <p>Complete records were not available of deviations for pneumatic controllers.</p> <p>Complete records were not available for rod packing replacements.</p>	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>LDAR Resurveys: 11/14/23</p> <p>Pneumatic Controllers: 1/30/24</p> <p>Rod Packing: 10/30/23</p>

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1	Thistle Compressor Station	Methanol Tanks; Fugitives	All sources of air contaminant emissions must be authorized by some appropriate permitting mechanism.	Methanol tanks were not evaluated for permitting. Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Three methanol tanks present on site. Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	5/18/2023	Pre-acquisition	Evaluate emissions of methanol tanks on site and submit permit revision. Submit permit revision to update fugitive counts to be more representative.	Permit Revision: 3/8/2024 (GCP Revision)	
2	Thistle Compressor Station	Dehy-1 and Dehy-2	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist. The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022. No records of inspections are available.	A204.A, A204.B, A204.C, 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021. No records of inspections were available.	Verified	Glycol dehydrator inspections are conducted typically on a daily basis during operator rounds. An inspection report documents this process. The site-specific extended analysis was used to perform the calculations for 2022 and will be conducted on an annual basis going forward. Record keeping process implemented.	9/27/2023	Pre-acquisition	Complete annual extended analysis at the dehydrator inlet and maintain records. Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records. Maintain records of inspections on glycol dehydrator.	2/28/2024	7/21/2023
3	Thistle Compressor Station	FL-1	The permittee shall record: 1) Chronologically, all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare into normal operating conditions, the name of the personnel conducting the inspection, and maintenance activities. 2) The results of the Method 22 observations and flame inspection for manual flares. 3) The results of the gas analysis including H2S, VOC content, and heating value. 4) Both the hourly and monthly flow meter and flow totalizer measurements of gas sent to the flare during each flaring event. 5) Monthly, based on the data monitored and recorded in this condition and the throughput of the gas streams sent to any high pressure flare, the calculations and the basis of the calculations of the maximum hourly emission rate and the monthly total emissions in tons per month. 6) If the maximum hourly emission rate calculated in requirement 5 above, exceeds the allowable hourly emission limit, calculate and record the hourly emission rate for each hour of each flaring event of that month. 7) If one of the process parameters for a controlled unit has been exceeded, calculate and record the hourly and annual emission calculations for low and high pressure flares, to determine compliance with each applicable emission limit for that piece of equipment.	No records available of alarm activation, flow rates, throughputs, calculations or comparison of process parameters to permitted values. Although dehy and fuel analyses were available, no records of flare analyses were available for this site.	A207.B	No records of alarm activation and information of event, results of Method 22, gas analysis, hourly and monthly flow sent to flare, monthly calculations, or hourly calculations.	Verified	Alarm activation is being recorded. Efforts continue to ensure the alarms are viewable in a central location. The flare operates at low pressure and there were no identified occurrences of visible emissions requiring a Method 22 observation. Meters are installed and record flow to the flares.	7/24/2023	Pre-acquisition	Maintain compliant flare records going forward.	2/28/2024	2/28/2024
4	Thistle Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records unavailable for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	7/6/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 3/8/2024 (GCP Revision)	
5	Thistle Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC. (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024

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6	Thistle Compressor Station	0316, 0317, 0489, 0490, 0584, ENG-6, 1201	For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.  NSPS JJJJ  Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.	Site has not kept consistent records with many of the requirements of JJJJ.	A202.F  40 CFR 60 Subpart JJJJ  40 CFR 60.4245(d)	Complete records were not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.  Complete records are not available for requirements going back two years.  Complete records were not available of submittal of performance testing.	Verified	Targa submitted initial NSPS JJJJ notifications.  Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Complete initial notification and comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	Initial Notification: 2/26/2024  Performance Testing: 11/6/2023
7	Thistle Compressor Station	0316, 0317, 0489, 0490, 0584, ENG-6, 1201	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device.  During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation.  The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records were not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	7/6/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
8	Thistle Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	7/6/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
9	Thistle Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B):  (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date;  (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and  (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa submitted startup/production rate notifications.	7/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	1/31/2024	2/26/2024
10	Thistle Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	Complete records were not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	7/6/2023	Pre-acquisition	Submit initial notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023
11	Thistle Compressor Station	T-1 through T-2	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure.  Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure.  Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit.  Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to increase inlet separation pressure to align with planned operations.	9/27/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 3/8/2024 (GCP Revision)	

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12	Thisle Compressor Station	Facility	<p>NSPS OOOOa</p> <p>Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.</p> <p>Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour.</p> <p>For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.</p> <p>Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).</p>	Site has not kept consistent records with many of the requirements of OOOOa.	<p>40 CFR 60 Subpart OOOOa</p> <p>40 CFR 60.5420a(c)(4)(i)-(iii),(v)</p> <p>40 CFR 60.5420a(c)(3)(ii)</p>	<p>Records are not available for all requirements going back two years.</p> <p>Complete records were not available of resurveying of identified fugitive emissions.</p> <p>Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.</p> <p>Complete records were not available of deviations for pneumatic controllers.</p> <p>Complete records were not available for rod packing replacements.</p>	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>LDAR Resurveys: 11/14/23</p> <p>Pneumatic Controllers: 1/30/24</p> <p>Rod Packing: 10/30/23</p>
13	Thisle Compressor Station	T-1 through T-2	<p>A single storage vessel that commenced construction, reconstruction, or modification after September 18, 2015, and on or before November 16, 2020, is a storage vessel affected facility if its potential for VOC emissions is equal to or greater than 6 tons per year (tpy) as determined according to this paragraph (e)(1).</p> <p>Reduce VOC emissions by 95.0 percent within 60 days after startup. For storage vessel affected facilities receiving liquids pursuant to the standards for well affected facilities in § 60.5375a(a)(1)(i) or (ii), you must achieve the required emissions reductions within 60 days after startup of production as defined in § 60.5430a.</p>	Based on actual emissions from the tanks determined over a 12-month period, the units are subject to OOOOa and must therefore comply with the provisions in 40 CFR 60.5395a.	<p>40 CFR 60.5365a(e)(1)</p> <p>40 CFR 60.5395a(2)</p>	The storage vessels at this facility have VOC emissions equal to or greater than 6 tons per year based on liquid throughput data, thereby making them subject to OOOOa. The units must reduce VOC emissions by 95%.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/19/2023	Pre-acquisition	Submit permit revision and evaluate control options.	Permit Revision: 3/8/2024 (GCP Revision)	

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1	Plantview Compressor Station	Fugitives; Heater Trailer	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit. Diesel fueled heater trailer present at facility and not included in permit. Records indicating diesel fuel is ultra low sulfur diesel are not being kept.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low. Heater trailer, which is used for the compressors, is present at the facility. This unit is not included in the permit.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	5/18/2023	Pre-acquisition	Submit permit revision.	Permit Revision: 4/17/2024 (Significant Revision)	
2	Plantview Compressor Station	SSM/M	(1) Compliance Method (a) Each month records shall be kept of the cumulative total of all VOC emissions related to SSM/M during the first 12 months and, thereafter of the monthly rolling 12 month total of SSM/M VOC emissions. Any malfunction emissions that have been reported in a final excess emissions report per 20.2.7.110.A(2) NMAC, shall be excluded from this total. (b) Records shall also be kept of the inlet gas analysis, the weight percent VOC of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the VOC emissions. (c) The permittee shall identify the equipment or activity and shall describe the event that is the source of emissions.  (2) Emissions included in Permit Limit and/or Reported as Excess Emissions (a) All emissions due to routine or predictable startup, shutdown, and/or maintenance (SSM) must be included under and shall not exceed the 10 tpy SSM/M emission limit in this permit. For emissions due to malfunctions, the permittee has the option to report these as excess emissions of the pound per hour limits in Table 106.A (or the pound per hour limits in condition B110F, if applicable), in accordance with 20.2.7 NMAC, or include the emissions under the 10 tpy limit.  (3) Condition B109 Records The permittee shall keep records in accordance with Condition B109 of this permit except for the following: (a) The requirement to record the start and end times of SSM/M events shall not apply to venting of known quantities of VOCs as long as the emissions do not exceed the SSM/M emission limit. (b) The requirement to record a description of the cause of the event shall not apply to SSM/M events as long as the emissions do not exceed the SSM/M emission limit.  If the facility has allowable SSM emission limits in the Registration Form, the permittee shall record all SSM events, including the date, the start time, the end time, a description of the event, and a description of the cause of the event. This record shall include, but not be limited to:	Complete records not available for SSM/M, including VOC emissions and start and end time of event. Records of gas analyses were available. SSM and M events are not identified or quantified in the permit.	A107.C; B109.C(2); B109.C(3); B110.E	Complete records not available for SSM or M VOC emissions at the time of audit. Records from pipeline and compressor blowdowns were available and reported as excess emissions, but not all SSM/M activities were quantified and included as excess emissions or counted against the SSM/M limit.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M VOC emissions.	2/28/2024	2/28/2024
3	Plantview Compressor Station	538, 539, 541, 274, 505, 9, 523, 497, 8, & 10	Monitoring: The unit(s) shall be operated with the catalytic converter, which includes catalyst maintenance periods. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine(s); or (2) replace the catalyst with a functionally equivalent spare to allow the engine to remain in operation.	Complete records were not available regarding changing catalyst were available.	A201.E	Complete records not available regarding operation with catalytic converter or records of maintenance including records of changing catalyst.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	7/6/2023	Pre-acquisition	Comply with catalyst monitoring and maintenance requirements.	2/28/2024	2/22/2024
4	Plantview Compressor Station	Dehy-1, Dehy-2	Monitoring: The permittee shall conduct an annual GRI-GlyCalc or ProMax analysis using the most recent extended gas analysis, and verify the input data. The permittee may use a method of calculating dehydrator emissions other than the most current version of GRI-GlyCalc or ProMax if approved by the Department. Changes in the calculated emissions due solely to a change in the calculation methodology shall not be deemed an exceedance of an emission limit. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYcalc or ProMax model. The permittee shall keep a record of the results, noting the emission rates for the dehydrator obtained from estimates using GRI-GLYcalc or ProMax. Compliance with the allowable VOC emission limits in Table 106.A shall be demonstrated by monitoring the glycol pump circulation rate for each unit shall not exceed 600 gallons per hour (10 gallons per minute).  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records of calculations not available for the past two years. Site specific analysis and calculations available for only 2022.	A202.A, 40 CFR 63.772(b)(2)(i)	Records of gph data were available. Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	9/27/2023	Pre-acquisition	Complete annual extended analysis at the dehydrator inlet and maintain records. Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records	2/28/2024	2/6/2024
5	Plantview Compressor Station	T-1, T-2, T-3, T-4	Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by limiting the monthly rolling 12-month total condensate throughput to the units to 314,173 gallons per year (7,480 barrels/year) per tank, or 29,921 barrels/year total and limiting the monthly rolling 12-month average separator pressure to less than 65.0 psia. Monitoring: The permittee shall monitor the monthly total throughput and the upstream separator pressure once per month. Recordkeeping: The permittee shall record: (1) the monthly total throughput of liquids and, (2) the monthly separator pressure. (3) Each month the permittee shall use these values to calculate and record: (a) during the first 12 months of monitoring, the cumulative total liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total liquid throughput and, (b) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Tank breathing and working emissions were calculated using the USEPA Tanks program Version 4.0.9.d [or more current] and tank flashing emissions using ProMax. Emission rates computed using the same parameters, but with a different Department approved algorithm that exceed these values will not be deemed non-compliance with this permit. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A203.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	9/27/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 4/17/2024 (Significant Revision)	

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6	Plantview Compressor Station	Reboil-1, Reboil-2	<p>Requirement:</p> <p>(1) Compliance with the allowable emission limits in Table 106.A shall be demonstrated by performing annual inspections to ensure proper operation of Units Reboil-1, Reboil- 2, and Reboil-3.</p> <p>(2) At a minimum, the operational inspections shall meet those recommended by the manufacturer or shall meet the facility specific procedure submitted to the Department.</p> <p>(3) If the permittee is using a facility specific procedure it shall submit an electronic version of the procedure to the Department's Permit Section Manager within 90 days of implementing the procedure. If the plan cannot be submitted within 90 days, the permittee shall obtain written approval to extend the deadline from the Department's Permit Section, either by regular or electronic mail. The permittee shall provide additional information or make changes to the plan as requested by the Department.</p> <p>(4) The permittee shall make changes or improvements to the inspection procedure based on experience with the unit and/or new information provided by the manufacturer. This updated procedure shall be made available to the Department upon request.</p> <p>Recordkeeping:</p> <p>(1) The permittee shall maintain records of operational inspections, including the indicators used to verify optimal excess combustion air, a description of the indicators, the unit component and housing inspections, and any adjustments needed to ensure optimal operation of the unit.</p> <p>(2) The permittee shall also keep records of the manufacturer's recommended or the permittee's facility specific operational inspection procedure and shall keep records of the percent of excess combustion air required for optimal performance.</p> <p>(3) The permittee shall maintain records in accordance with Section B109.</p>	Facility specific procedure was not submitted to NMED	A204.A	Facility specific procedure was not submitted to NMED	Verified	recordkeeping process implemented	7/6/2023	Pre-acquisition	Ensure inspections are being completed to comply with the requirements.	2/28/2024	1/26/2024
7	Plantview Compressor Station	Facility	<p>The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B):</p> <p>(1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date;</p> <p>(2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and</p> <p>(3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.</p>	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa submitted startup/production rate notifications.	7/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
8	Plantview Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	Complete records were not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	7/6/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023
9	Plantview Compressor Station	Facility	<p>NSPS OOOOa</p> <p>Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.</p> <p>Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.</p> <p>Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why.</p> <p>If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour.</p> <p>For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.</p> <p>Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).</p>	Site has not kept consistent records with many of the requirements of OOOOa.	<p>40 CFR 60 Subpart OOOOa</p> <p>40 CFR 60.5397a(h)(4)</p> <p>40 CFR 60.5420a(c)(4)(i)-(iii), (v)</p> <p>40 CFR 60.5420a(c)(3)(ii)</p>	<p>Records are not available for all requirements going back two years.</p> <p>Complete records were not available of resurveying of identified fugitive emissions.</p> <p>Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.</p> <p>Complete records were not available of deviations for pneumatic controllers.</p> <p>Complete records were not available for rod packing replacements.</p>	Verified	As of November 2022, fugitive monitoring and recordkeeping has been updated to meet the compliance requirements of NSPS OOOOa.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>LDAR Resurveys: 11/14/23</p> <p>Pneumatic Controllers: 1/30/24</p> <p>Rod Packing: 10/30/23</p>
10	Plantview Compressor Station	Facility	Except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m <sup>3</sup> ) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.	Facility may be subject to 40 CFR 60 Subpart Kb.	40 CFR 60.110b	Facility needs to evaluate Kb applicability.	Verified	As part of the permit revision, Targa will evaluate, permit, and install an appropriate control device on the affected tanks.	12/12/2023	Pre-acquisition	Evaluate Kb applicability and requirements.	Permit Revision: 4/17/2024 (Significant Revision)	

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11	Plantview Compressor Station	Engines	<p>NSPS JJJJ</p> <p>Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.</p> <p>For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart III and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.</p>	Site has not kept consistent records with many of the requirements of JJJJ.	<p>40 CFR 60 Subpart JJJJ</p> <p>40 CFR 60.4245(d)</p> <p>A201.F, A201.G</p>	<p>Complete records were not available for requirements going back two years.</p> <p>Complete records were not available of submittal of performance testing.</p> <p>Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.</p>	Verified	<p>Targa submitted initial NSPS JJJJ notifications.</p> <p>Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.</p>	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>Initial Notification: 2/26/2024</p> <p>Performance Testing: 11/6/2023</p>

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1	Dos Equis	Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low.	Verified		5/18/2023	Pre-acquisition	Submit permit revision to update fugitive counts to be more representative.	11/30/2023	11/20/2023
2	Dos Equis	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM plan developed	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Dos Equis	TK-1 and TK-2	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	10/25/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	11/30/2023	11/20/2024
4	Dos Equis	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.  (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
5	Dos Equis	Dehy-1	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Records were unavailable of site specific extended gas analyses; Records of annual GlyCalc model inputs or results using the site specific analysis were not available, but records using a representative analysis are available for 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	No annual extended analysis was completed at the dehydrator inlet for this site going back two years. Records unavailable for previous two years of extended annual gas analyses and calculated emissions. 2022 calculations available, but only using a representative analysis	Verified	Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
6	Dos Equis	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa submitted startup/production rate notifications.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
7	Dos Equis	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	2/28/2024	11/20/2023
8	Dos Equis	ENG-2 through ENG-7	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
9	Dos Equis	Engines	NSPS JJJJ Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.	Site has not kept consistent records with many of the requirements of JJJJ.	40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d) A202.F	Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing. Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	Initial Notification: 2/23/2024 Performance Testing: 11/6/2023
10	Dos Equis	ENG-2 through ENG-7	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
11	Dos Equis	Facility	NSPS OOOOa Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions. Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa 40 CFR 60.5397a(h)(4) 40 CFR 60.5420a(c)(4)(i)-(iii),(v)	Records are not available for all requirements going back two years. Complete records were not available of resurveying of identified fugitive emissions. Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers. Complete records were not available of deviations for pneumatic controllers.	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23 Pneumatic Controllers: 1/30/24 Rod Packing: 10/30/23

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12	Dos Equis	Compressors	<p>On or before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of your reciprocating compressor affected facility, August 2, 2016, or the date of the most recent reciprocating compressor rod packing replacement, whichever is latest.</p> <p>Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).</p> <p>Records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in § 60.5385a, including the date and time the deviation began, duration of the deviation, and a description of the deviation.</p>	Rod packing replacements were not completed prior to the compressor having operated for 26,000 hours.	<p>40 CFR 60.5385a</p> <p>40 CFR 60.5420a(c)(3)(ii)-(iii)</p>	<p>The cumulative number of hours of operation since the previous reciprocating compressor rod packing replacement or since initial startup exceeded 26,000 hours for compressors 10860, 11034, 11002, and 11291.</p> <p>Complete records were not available of the date and time of each rod packing replacement.</p> <p>Complete records were not available for deviations for compressors 10860, 11034, 11002, and 11291.</p>	Verified	Targa has a recordkeeping process in place for tracking deviations as of Fall 2022 and is currently evaluating the process to ensure all deviations are being recorded and reported appropriately.	12/12/2023	Pre-acquisition	<p>Replace reciprocating compressor rod packing.</p> <p>Maintain compliant records for rod packing replacements.</p> <p>Maintain compliant records of deviations at facility.</p>	2/28/2024	10/31/2023
13	Dos Equis	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Records are not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
14	Dos Equis	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	No records of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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1	Bootleg Compressor Station	Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	5/18/2023	Pre-acquisition	Submit permit revision to update fugitive counts to be more representative.	Permit Revision: 4/5/2024 (GCP Revision)	
2	Bootleg Compressor Station	T-1 through T-2	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	10/25/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be repermited.	Permit Revision: 4/5/2024 (GCP Revision)	
3	Bootleg Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC. (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
4	Bootleg Compressor Station	Dehy-1	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist. The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1).	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A204.B, 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
5	Bootleg Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa submitted startup/production rate notifications.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024

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6	Bootleg Compressor Station	Facility	<p>NSPS OOOOa</p> <p>Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.</p> <p>Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.</p> <p>Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why.</p> <p>If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour.</p> <p>For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.</p> <p>Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).</p>	Site has not kept consistent records with many of the requirements of OOOOa.	<p>40 CFR 60 Subpart OOOOa</p> <p>40 CFR 60.5397a(h)(4)</p> <p>40 CFR 60.5420a(c)(4)(i)-(iii),(v)</p> <p>40 CFR 60.5420a(c)(3)(ii)</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of resurveying of identified fugitive emissions.</p> <p>Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.</p> <p>Complete records were not available of deviations for pneumatic controllers.</p> <p>Complete records were not available for rod packing replacements.</p>	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>LDAR Resurveys: 11/14/23</p> <p>Pneumatic Controllers: 1/30/24</p> <p>Rod Packing: 10/30/23</p>
7	Bootleg Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 4/5/2024 (GCP Revision)	
8	Bootleg Compressor Station	17-0535, 17-0536, 17-0641	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
9	Bootleg Compressor Station	17-0535, 17-0536, 17-0641	<p>Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device.</p> <p>During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation.</p> <p>The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.</p>	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
10	Bootleg Compressor Station	Engines	<p>NSPS JJJJ</p> <p>Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.</p> <p>For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.</p>	Site has not kept consistent records with many of the requirements of JJJJ.	<p>40 CFR 60 Subpart JJJJ</p> <p>40 CFR 60.4245(d)</p> <p>A202.F</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of submittal of performance testing.</p> <p>Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.</p>	Verified	<p>Targa submitted initial NSPS JJJJ notifications.</p> <p>Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.</p>	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>Initial Notification: 2/23/2024</p> <p>Performance Testing: 11/6/2023</p>
11	Bootleg Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
12	Bootleg Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	No records of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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1	Casa Bonita Compressor Station	Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	5/18/2023	Pre-acquisition	Submit permit revision to update fugitive counts to be more representative.	11/30/2023	10/6/2023
2	Casa Bonita Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plans developed.	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Casa Bonita Compressor Station	TK-1 through TK-2	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	10/25/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.		10/6/2023
4	Casa Bonita Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.  (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12- month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
5	Casa Bonita Compressor Station	Dehy-1	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Permitted glycol pump rate was exceeded. Records were unavailable of site specific extended gas analyses; Records of annual GlyCalc model inputs or results using the site specific analysis were not available, but records using a representative analysis are available for 2022.	A024.A, A204.B; 40 CFR 63.772(b)(2)(i)	No annual extended analysis was completed at the dehydrator inlet for this site going back two years. Records unavailable for previous two years of extended annual gas analyses and calculated emissions. 2022 calculations available, but only using a representative analysis. Permitted glycol pump rate was exceeded.	Verified	Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records. Determine if facility needs to be re-permitted at new glycol pump rate.	2/28/2024	2/6/2024

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
6	Casa Bonita Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa submitted startup/production rate notifications.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
7	Casa Bonita Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	2/28/2024	10/6/2023
8	Casa Bonita Compressor Station	ENG-5, ENG -6	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
9	Casa Bonita Compressor Station	ENG-5, ENG -6	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
10	Casa Bonita Compressor Station	Engines	NSPS JJJJ Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.	Site has not kept consistent records with many of the requirements of JJJJ.	40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d) A202.F	Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing. Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	Initial Notification: 2/23/2024 Performance Testing: 11/6/2023
11	Casa Bonita Compressor Station	Compressors	On or before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of your reciprocating compressor affected facility, August 2, 2016, or the date of the most recent reciprocating compressor rod packing replacement, whichever is latest. Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3). Records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in § 60.5385a, including the date and time the deviation began, duration of the deviation, and a description of the deviation.	Complete and consistent records were not available.	40 CFR 60.5385a 40 CFR 60.5420a(c)(3)(ii)-(iii)	The cumulative number of hours of operation since the previous reciprocating compressor rod packing replacement or since initial startup exceeded 26,000 hours for compressors 11032 and 13934. Complete records were not available of the date and time of each rod packing replacement. Complete records were not available for deviations for compressors 11032 and 13934.	Verified	Targa has a recordkeeping process in place for tracking deviations as of Fall 2022 and is currently evaluating the process to ensure all deviations are being recorded and reported appropriately.	7/25/2023	Pre-acquisition	Replace reciprocating compressor rod packing. Maintain compliant records for rod packing replacements. Maintain compliant records of deviations at facility.	2/28/2024	10/31/2023

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
12	Casa Bonita Compressor Station	Fugitives	<p>NSPS OOOOa</p> <p>Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.</p> <p>Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.</p> <p>Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why.</p> <p>If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour.</p> <p>For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.</p>	Site has not kept consistent records with many of the requirements of OOOOa.	<p>40 CFR 60 Subpart OOOOa</p> <p>40 CFR 60.5397a(h)(4)</p> <p>40 CFR 60.5420a(c)(4)(i)-(iii),(v)</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of resurveying of identified fugitive emissions.</p> <p>Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.</p> <p>Complete records were not available of deviations for pneumatic controllers.</p>	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>LDAR Resurveys: 11/14/23</p> <p>Pneumatic Controllers: 1/30/24</p>
13	Casa Bonita Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	10/25/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
14	Casa Bonita Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	Complete records are not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	10/25/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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1	Achilles Compressor Station	Heater Trailer Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Diesel fueled heater trailer present at facility and not included in permit. Records indicating diesel fuel is ultra low sulfur diesel are not being kept. Fugitives are underrepresented in current permit.	20.2.72.200.F NMAC	Heater trailer, which is used for the compressors, is present at the facility. This unit is not included in the permit. Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	5/18/2023	Pre-acquisition	Submit permit revision.	Permit Revision: 2/28/24 (GCP Revision)	2/23/2024
2	Achilles Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plans developed.	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Achilles Compressor Station	TK-1 through TK-3	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	10/25/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 2/28/24 (GCP Revision)	2/23/2024
4	Achilles Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC. (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
5	Achilles Compressor Station	Dehy-1	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist. The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024

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6	Achilles Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa submitted startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
7	Achilles Compressor Station	Facility	NSPS OOOOa Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions. Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation. Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa 40 CFR 60.5397a(h)(4) 40 CFR 60.5420a(c)(4)(i)-(iii), (v) 40 CFR 60.5420a(c)(3)(ii)	Complete records are not available for requirements going back two years. Complete records were not available of resurveying of identified fugitive emissions. Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers. Complete records were not available of deviations for pneumatic controllers. Complete records were not available for rod packing replacements.	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23 Pneumatic Controllers: 1/30/24 Rod Packing: 10/30/23
8	Achilles Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 2/28/24 (GCP Revision)	2/23/2024
9	Achilles Compressor Station	ENG-3 through ENG-9	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
10	Achilles Compressor Station	ENG-3 through ENG-9	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
11	Achilles Compressor Station	Engines	NSPS JJJJ Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.	Site has not kept consistent records with many of the requirements of JJJJ.	40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d) A202.F	Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing. Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	Initial Notification: 2/23/2024 Performance Testing: 11/6/2023
12	Achilles Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
13	Achilles Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	No records of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
1	Helios Compressor Station	Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	5/18/2023	Pre-acquisition	Submit permit revision to update fugitive counts to be more representative.	Permit Revision: 4/26/2024 (GCP Revision)	
2	Helios Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plans developed.	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Helios Compressor Station	TK-1 through TK-3	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	10/25/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 4/26/2024 (GCP Revision)	
4	Helios Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.  (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
5	Helios Compressor Station	Dehy-1	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Records were unavailable of site specific extended gas analyses; Records of annual GlyCalc model inputs or results using the site specific analysis were not available, but records using a representative analysis are available for 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	No annual extended analysis was completed at the dehydrator inlet for this site going back two years. Records unavailable for previous two years of extended annual gas analyses and calculated emissions. 2022 calculations available, but only using a representative analysis	Verified	Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
6	Helios Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa submitted startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	12/31/2024	2/26/2024
7	Helios Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 4/26/2024 (GCP Revision)	
8	Helios Compressor Station	ENG-1 through ENG-6	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
9	Helios Compressor Station	ENG-1 through ENG-6	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
10	Helios Compressor Station	Engines	NSPS JJJJ Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart III and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.	Site has not kept consistent records with many of the requirements of JJJJ.	40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d) A202.F	Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing. Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	Initial Notification: 2/26/2024 Performance Testing: 11/6/2023
11	Helios Compressor Station	Compressors	On or before the compressor has operated for 26,000 hours. The number of hours of operation must be continuously monitored beginning upon initial startup of your reciprocating compressor affected facility, August 2, 2016, or the date of the most recent reciprocating compressor rod packing replacement, whichever is latest. Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3). Records of deviations in cases where the reciprocating compressor was not operated in compliance with the requirements specified in § 60.5385a, including the date and time the deviation began, duration of the deviation, and a description of the deviation.	Complete and consistent records were not available.	40 CFR 60.5385a 40 CFR 60.5420a(c)(3)(ii)-(iii)	The cumulative number of hours of operation since the previous reciprocating compressor rod packing replacement or since initial startup exceeded 26,000 hours for compressors 10060, 10217, 10452, 11029, and 11100. Complete records were not available of the date and time of each rod packing replacement. Complete records were not available for deviations for compressors 10060, 10217, 10452, 11029, and 11100.	Verified	Targa has a recordkeeping process in place for tracking deviations as of Fall 2022 and is currently evaluating the process to ensure all deviations are being recorded and reported appropriately.	12/12/2023	Pre-acquisition	Replace reciprocating compressor rod packing. Maintain compliant records for rod packing replacements. Maintain compliant records of deviations at facility.	2/28/2024	10/31/2023

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12	Helios Compressor Station	Fugitives	<p>NSPS OOOOa</p> <p>Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.</p> <p>Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.</p> <p>Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why.</p> <p>If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour.</p> <p>For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.</p> <p>Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).</p>	Site has not kept consistent records with many of the requirements of OOOOa.	<p>40 CFR 60 Subpart OOOOa</p> <p>40 CFR 60.5397a(h)(4)</p> <p>40 CFR 60.5420a(c)(4)(i)-(iii), (v)</p> <p>40 CFR 60.5420a(c)(3)(ii)</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of resurveying of identified fugitive emissions.</p> <p>Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.</p> <p>Complete records were not available of deviations for pneumatic controllers.</p> <p>Complete records were not available for rod packing replacements.</p>	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>LDAR Resurveys: 11/14/23</p> <p>Pneumatic Controllers: 1/30/24</p> <p>Rod Packing: 10/30/23</p>
13	Helios Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Records are not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	10/25/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
14	Helios Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	No records of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	10/25/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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1	Eider Compressor Station	Fugitives Methanol Tanks Condensate Tanks	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit. Methanol Tanks at the site have not been previously represented in permit application forms. Tanks are incorrectly represented in the permit for the facility.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low.  Two 520 methanol tanks present on site.  Tanks on site are 400 bbl tanks. Represented as 300 bbl tanks in the permit.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	5/18/2023	Pre-acquisition	Submit permit revision.	Permit Revision: 2/28/24 (GCP Revision)	2/18/2024
2	Eider Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plans exist for key facilities and are in development for the remainder of facilities.	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Eider Compressor Station	TK-1 through TK-2	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure were available, but separator pressure represented in application has been exceeded.	A205.A	Records of separator pressure were available, but separator pressure represented in application has been exceeded.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	10/25/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 2/28/24 (GCP Revision)	2/18/2024
4	Eider Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.  (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D; A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
5	Eider Compressor Station	Dehy-1	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024

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6	Eider Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	1/31/2024	2/26/2024
7	Eider Compressor Station	Facility	NSPS OOOOa Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions. Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation. Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa 40 CFR 60.5397a(h)(4) 40 CFR 60.5420a(c)(4)(i)-(iii), (v) 40 CFR 60.5420a(c)(3)(ii)	Complete records are not available for requirements going back two years. Complete records were not available of resurveying of identified fugitive emissions. Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers. Complete records were not available of deviations for pneumatic controllers. Complete records were not available for rod packing replacements.	Verified	OOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23 Pneumatic Controllers: 1/30/24 Rod Packing: 10/30/23
8	Eider Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 2/28/24 (GCP Revision)	2/18/2024
9	Eider Compressor Station	ENG-2	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
10	Eider Compressor Station	ENG-2	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
11	Eider Compressor Station	ENG-2	NSPS JJJJ Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.	Site has not kept consistent records with many of the requirements of JJJJ.	40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d) A202.F	Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing. Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	Initial Notification: 2/23/2024 Performance Testing: 11/6/2023
12	Eider Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
13	Eider Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	Complete records not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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1	Twisted Sister Compressor Station	Fugitives Condensate Tanks Methanol Tanks Facility	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit. Tanks are incorrectly represented in the permit for the facility. Methanol Tanks at the site have not been previously represented in permit application forms. Permit was not updated for temporary flare installation.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low. Tanks on site are 210 bbl but are represented as 300 bbl in permit. Three methanol tanks on site. Portable flare present at facility. Site is permitted for a TO - refer to 7116M4. Old thermal oxidizer still present at facility.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	5/18/2023	Pre-acquisition	Submit permit revision.	Permit Revision: 3/1/2024 (GCP Revision)	
2	Twisted Sister Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	7/6/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 3/1/2024 (GCP Revision)	
3	Twisted Sister Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC. (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	7/6/2023	Pre-acquisition	Maintain compliant records for malfunction events.	2/28/2024	2/28/2024
4	Twisted Sister Compressor Station	16-0494, 16-0495, 17-0584, ENG-4	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	7/6/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
5	Twisted Sister Compressor Station	16-0494, 16-0495, 17-0584, ENG-4	For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ. Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.	Site has not kept consistent records with many of the requirements of JJJJ.	A202.F 40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d)	Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ. Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	7/6/2023	Pre-acquisition	Complete initial notification and comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	Initial Notification: 2/26/2024 Performance Testing: 11/6/2023
6	Twisted Sister Compressor Station	16-0494, 16-0495, 17-0584, ENG-4	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	7/6/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024

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7	Twisted Sister Compressor Station	Dehy-1	<p>Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent.</p> <p>Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent.</p> <p>Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed.</p> <p>Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist.</p> <p>The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or</p>	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
8	Twisted Sister Compressor Station	T-1 through T-2	<p>Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure.</p> <p>Each month the permittee shall use these values to calculate and record:</p> <ol style="list-style-type: none"> <li>during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and</li> <li>during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure.</li> </ol> <p>Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit.</p> <p>Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.</p>	Records of separator pressure were available, but separator pressure represented in application has been exceeded.	A205.A	Records of separator pressure were available, but separator pressure represented in application has been exceeded.	Verified	Records of liquid throughput and inlet separation are kept by Operations staff.	9/27/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 3/1/2024 (GCP Revision)	
9	Twisted Sister Compressor Station	AU-1	<p>Monitoring: The permittee shall:</p> <ol style="list-style-type: none"> <li>calibrate the flow meter semi-annually in accordance with the manufacturer's, permittee's, or equivalent recommended schedule. The calibration shall be in accordance with the specifications at 40 CFR 98, and</li> <li>monitor the flow rate daily (in units of MMscf/day) and monitor the circulation rate monthly.</li> </ol> <p>Recordkeeping: The permittee shall keep records in accordance with Section B109, and of the following:</p> <ol style="list-style-type: none"> <li>flow meter calibration results,</li> <li>daily total of natural gas or NGL throughput each day in units of MMscf/day or barrels/day,</li> <li>the pump flow rate in gpm and the basis for determination of flow rate, and</li> <li>the manufacturer's specification sheet indicating the maximum flow rate of the pump.</li> </ol>	Complete records not available.	A210.A	Complete records of flow meter calibration results, daily throughput.	Verified	Targa has implemented processes to ensure monitoring and recordkeeping occur on the correct frequency and include the appropriate data.	7/6/2023	Pre-acquisition	Maintain compliant amine records going forward.	2/28/2024	2/21/2024
10	Twisted Sister Compressor Station	AU-1	<p>Monitoring: The permittee shall inspect the amine treatment unit, piping, and, if selected, the control equipment semi-annually to ensure it is operating as designed.</p> <p>Alternatively to the above, and if selected in the Registration Form, the Permittee may implement a program that meets the requirements of NSPS OOOOa (40 CFR 60.5416a).</p> <p>The permittee shall record the date, the name of the personnel conducting the inspection, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the amine treatment unit into compliance. The permittee shall maintain a copy of the manufacturer's, permittees, or equivalent maintenance recommendations.</p>	Complete records were not available.	A210.B	Complete records not available of inspection for amine, piping, and control device.	Verified	Targa has implemented processes to ensure the amine system and control equipment are inspected and operating as designed.	7/6/2023	Pre-acquisition	Maintain compliant amine records going forward.	2/28/2024	2/21/2024
11	Twisted Sister Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Records are not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	7/6/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024

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12	Twisted Sister Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	7/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/27/2024
13	Twisted Sister Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	No records of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	7/6/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023
14	Twisted Sister Compressor Station	Facility	NSPS OOOOa Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions. Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation. Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa 40 CFR 60.5397a(h)(4) 40 CFR 60.5420a(c)(4)(i)-(iii),(v) 40 CFR 60.5420a(c)(3)(ii)	Complete records were not available for requirements going back two years. Complete records were not available of resurveying of identified fugitive emissions. Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers. Complete records were not available of deviations for pneumatic controllers. Complete records were not available for rod packing replacements.	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23 Pneumatic Controllers: 1/30/24 Rod Packing: 10/30/23
15	Twisted Sister Compressor Station	T-1 through T-2	A single storage vessel that commenced construction, reconstruction, or modification after September 18, 2015, and on or before November 16, 2020, is a storage vessel affected facility if its potential for VOC emissions is equal to or greater than 6 tons per year (tpy) as determined according to this paragraph (e)(1). Reduce VOC emissions by 95.0 percent within 60 days after startup. For storage vessel affected facilities receiving liquids pursuant to the standards for well affected facilities in § 60.5375a(a)(1)(i) or (ii), you must achieve the required emissions reductions within 60 days after startup of production as defined in § 60.5430a.	Based on actual emissions from the tanks determined over a 12-month period, the units are subject to OOOOa and must therefore comply with the provisions in 40 CFR 60.5395a.	40 CFR 60.5365a(c)(1) 40 CFR 60.5395a(2)	The storage vessels at this facility have VOC emissions equal to or greater than 6 tons per year based on liquid throughput data, thereby making them subject to OOOOa. The units must reduce VOC emissions by 95%.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/19/2023	Pre-acquisition	Submit permit revision and evaluate control options.	Permit Revision: 3/1/2024 (GCP Revision)	

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1	Wildhog Compressor Station	Tanks	All sources of air contaminant emissions must be authorized by some appropriate permitting mechanism.	Tanks are not accurately represented in the permit for the facility.  H2S scavenger tank needs to be evaluated for emissions and represented in the permit for the facility.  Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Two condensate tanks and one produced water tank on site. Facility is only permitted for two tanks.  Tanks on site are 400 bbl in size. Tanks in permit are only 300 bbl capacity.  300 bbl H2S Scavenger tank present at facility.  Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	5/18/2023	Pre-acquisition	Submit permit revision.	Permit Revision: 3/29/2024 (GCP Revision)	
2	Wildhog Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plans exist for key facilities and are in development for the remainder of facilities.	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Wildhog Compressor Station	TK-1 through TK-2	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	10/25/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 3/29/2024 (GCP Revision)	
4	Wildhog Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.  (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
5	Wildhog Compressor Station	Dehy-1	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
6	Wildhog Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
7	Wildhog Compressor Station	Facility	NSPS OOOOa Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions. Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation. Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa 40 CFR 60.5397a(h)(4) 40 CFR 60.5420a(c)(4)(i)-(iii),(v) 40 CFR 60.5420a(c)(3)(ii)	Complete records are not available for requirements going back two years. Complete records were not available of resurveying of identified fugitive emissions. Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers. Complete records were not available of deviations for pneumatic controllers. Complete records were not available for rod packing replacements.	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23 Pneumatic Controllers: 1/30/24 Rod Packing: 10/30/23
8	Wildhog Compressor Station	ENG-1 and ENG-2	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
9	Wildhog Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 3/29/2024 (GCP Revision)	
10	Wildhog Compressor Station	ENG-1 and ENG-2	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
11	Wildhog Compressor Station	Engines	NSPS JJJJ Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart III and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.	Site has not kept consistent records with many of the requirements of JJJJ.	40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d) A202.F	Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing. Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	Initial Notification: 2/26/2024 Performance Testing: 11/6/2023

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12	Wildhog Compressor Station	Combustor	The permittee shall record: 1) Chronologically, all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the unit into normal operating conditions, and maintenance 2) The results of the Method 22 observations, 3) The results of the gas analyses including H2S, VOC content, and heating value, 4) For high pressure units, both the hourly and monthly flow meter and flow totalizer measurements of gas sent to the unit, and 5) Calculations if one of the process parameters has been exceeded to determine compliance with each applicable emission limit for that piece of equipment.	Complete records not available of alarm activation, flow rates, throughputs, calculations or comparison of process parameters to permitted values. Although dehy and fuel analyses were available, no records of combustor analyses were available for this site.	A208.A	Complete records are not available of alarm activation and information of event, results of Method 22, gas analysis, hourly and monthly flow sent to combustor, monthly calculations, or hourly calculations.	Verified	Alarm activation is being recorded. Efforts continue to ensure the alarms are viewable in a central location.  The combustor operates at low pressure and there were no identified occurrences of visible emissions requiring a Method 22 observation. Meters are installed and record flow to the flares.	12/12/2023	Pre-acquisition	Maintain compliant flare records going forward.	2/28/2024	2/28/2024
13	Wildhog Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
14	Wildhog Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	Complete records are not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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1	Vandelay Compressor Station	Fugitives Methanol Tanks	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit. Methanol tanks were not evaluated for permitting.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low. Two methanol tanks present at facility.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	5/18/2023	Pre-acquisition	Submit permit revision.	Permit Revision: 2/28/2024 (GCP Revision)	2/9/2024
2	Vandelay Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plans exist for key facilities and are in development for the remainder of facilities.	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Vandelay Compressor Station	TK-1 through TK-5	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	10/25/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 2/28/2024 (GCP Revision)	2/9/2024
4	Vandelay Compressor Station	Dehy-1 and Dehy-2	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist. The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Records were unavailable of site specific extended gas analyses; Records of annual GlyCalc model inputs or results using the site specific analysis were not available, but records using a representative analysis are available for 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	No annual extended analysis was completed at the dehydrator inlet for this site going back two years. Records unavailable for previous two years of extended annual gas analyses and calculated emissions. 2022 calculations available, but only using a representative analysis	Verified	Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
5	Vandelay Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC. (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024

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6	Vandelay Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
7	Vandelay Compressor Station	Facility	NSPS OOOOa Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions. Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation. Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa 40 CFR 60.5397a(h)(4) 40 CFR 60.5420a(c)(4)(i)-(iii),(v) 40 CFR 60.5420a(c)(3)(ii)	Complete records are not available for requirements going back two years. Complete records were not available of resurveying of identified fugitive emissions. Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers. Complete records were not available of deviations for pneumatic controllers. Complete records were not available for rod packing replacements.	Verified	OOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23 Pneumatic Controllers: 1/30/24 Rod Packing: 10/30/23
8	Vandelay Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 2/28/2024 (GCP Revision)	2/9/2024
9	Vandelay Compressor Station	ENG-1 through ENG-9	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
10	Vandelay Compressor Station	ENG-1 through ENG-9	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
11	Vandelay Compressor Station	Engines	NSPS JJJJ Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.	Site has not kept consistent records with many of the requirements of JJJJ.	40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d) A202.F	Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing. Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	Initial Notification: 2/26/2024 Performance Testing: 11/6/2023

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12	Vandelay Compressor Station	FL-1	The permittee shall record: 1) Chronologically, all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare into normal operating conditions, the name of the personnel conducting the inspection, and maintenance activities. 2) The results of the Method 22 observations and flame inspection for manual flares. 3) The results of the gas analysis including H2S, VOC content, and heating value. 4) Both the hourly and monthly flow meter and flow totalizer measurements of gas sent to the flare during each flaring event. 5) Monthly, based on the data monitored and recorded in this condition and the throughput of the gas streams sent to any high pressure flare, the calculations and the basis of the calculations of the maximum hourly emission rate and the monthly total emissions in tons per month. 6) If the maximum hourly emission rate calculated in requirement 5 above, exceeds the allowable hourly emission limit, calculate and record the hourly emission rate for each hour of each flaring event of that month. 7) If one of the process parameters for a controlled unit has been exceeded, calculate and record the hourly and annual emission calculations for low and high pressure flares, to determine compliance with each applicable emission limit for that piece of equipment.	Complete records not available of alarm activation, flow rates, throughputs, calculations or comparison of process parameters to permitted values. Although dehy and fuel analyses were available, no records of flare analyses were available for this site.	A207.B	No records of alarm activation and information of event, results of Method 22, gas analysis, hourly and monthly flow sent to flare, monthly calculations, or hourly calculations.	Verified	Alarm activation is being recorded. Efforts continue to ensure the alarms are viewable in a central location.  The flare operates at low pressure and there were no identified occurrences of visible emissions requiring a Method 22 observation. Meters are installed and record flow to the flares.	12/12/2023	Pre-acquisition	Maintain compliant flare records going forward.	2/28/2024	2/28/2024
13	Vandelay Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Records are not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	10/25/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
14	Vandelay Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	Complete records were not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	10/25/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/23

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1	Pirate Compressor Station	Fugitives Methanol Tanks Condensate Tanks	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit. Methanol tanks were not evaluated for permitting. The facility is permitted for two tanks, but three are present on site.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low. Three methanol tanks present on site. Three tanks present at the facility, but only two are permitted.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	5/18/2023	Pre-acquisition	Submit permit revision.	Permit Revision: 4/12/2024 (GCP Revision)	
2	Pirate Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plans exist for key facilities and are in development for the remainder of facilities.	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Pirate Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC. (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12- month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D; A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
4	Pirate Compressor Station	Dehy-1 and Dehy-2	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist. The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
5	Pirate Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
6	Pirate Compressor Station	Facility	<p>NSPS OOOOa</p> <p>Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.</p> <p>Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.</p> <p>Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why.</p> <p>If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour.</p> <p>For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.</p> <p>Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).</p>	Site has not kept consistent records with many of the requirements of OOOOa.	<p>40 CFR 60 Subpart OOOOa</p> <p>40 CFR 60.5397a(h)(4)</p> <p>40 CFR 60.5420a(c)(4)(i)-(iii),(v)</p> <p>40 CFR 60.5420a(c)(3)(ii)</p>	<p>Records are not available for all requirements going back two years.</p> <p>Complete records were not available of resurveying of identified fugitive emissions.</p> <p>Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.</p> <p>Complete records were not available of deviations for pneumatic controllers.</p> <p>Complete records were not available for rod packing replacements.</p>	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>LDAR Resurveys: 11/14/23</p> <p>Pneumatic Controllers: 1/30/24</p> <p>Rod Packing: 10/30/23</p>
7	Pirate Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 4/12/2024 (GCP Revision)	
8	Pirate Compressor Station	ENG-1 through ENG-4	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
9	Pirate Compressor Station	ENG-1 through ENG-4	<p>Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device.</p> <p>During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation.</p> <p>The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.</p>	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
10	Pirate Compressor Station	Engines	<p>NSPS JJJJ</p> <p>Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.</p> <p>For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.</p>	Site has not kept consistent records with many of the requirements of JJJJ.	<p>40 CFR 60 Subpart JJJJ</p> <p>40 CFR 60.4245(d)</p> <p>A202.F</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of submittal of performance testing.</p> <p>Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.</p>	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>Initial Notification: 2/6/2024</p> <p>Performance Testing: 11/6/2023</p>
11	Pirate Compressor Station	Combustor	The permittee shall record: 1) Chronologically, all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the unit into normal operating conditions, and maintenance 2) The results of the Method 22 observations, 3) The results of the gas analyses including H2S, VOC content, and heating value, 4) For high pressure units, both the hourly and monthly flow meter and flow totalizer measurements of gas sent to the unit, and 5) Calculations if one of the process parameters has been exceeded to determine compliance with each applicable emission limit for that piece of equipment.	Complete records not available of alarm activation, flow rates, throughputs, calculations or comparison of process parameters to permitted values. Although deby and fuel analyses were available, no records of combustor analyses were available for this site.	A208.A	No records of alarm activation and information of event, results of Method 22, gas analysis, hourly and monthly flow sent to combustor, monthly calculations, or hourly calculations.	Verified	Alarm activation is being recorded. Efforts continue to ensure the alarms are viewable in a central location. The combustor operates at low pressure and there were no identified occurrences of visible emissions requiring a Method 22 observation. Meters are installed and record flow to the flares.	12/12/2023	Pre-acquisition	Maintain compliant flare records going forward.	2/28/2024	2/28/2024
12	Pirate Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Records are not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
13	Pirate Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	No records of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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1	Limestone Compressor Station	Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	5/18/2023	Pre-acquisition	Submit permit revision to update fugitive counts to be more representative.	Permit Revision: 4/5/2024 (GCP Revision)	
2	Limestone Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plans exist for key facilities and are in development for the remainder of facilities.	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Limestone Compressor Station	TK-1 through TK-3	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	10/25/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 4/5/2024 (GCP Revision)	
4	Limestone Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.  (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
5	Limestone Compressor Station	Dehy-1	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Records were unavailable of site specific extended gas analyses; Records of annual GlyCalc model inputs or results using the site specific analysis were not available, but records using a representative analysis are available for 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	No annual extended analysis was completed at the dehydrator inlet for this site going back two years. Records unavailable for previous two years of extended annual gas analyses and calculated emissions. 2022 calculations available, but only using a representative analysis	Verified	Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024

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6	Limestone Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
7	Limestone Compressor Station	Facility	NSPS OOOOa Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions. Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation. Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa 40 CFR 60.5397a(h)(4) 40 CFR 60.5420a(c)(4)(i)-(iii),(v) 40 CFR 60.5420a(c)(3)(ii)	Complete records are not available for requirements going back two years. Complete records were not available of resurveying of identified fugitive emissions. Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers. Complete records were not available of deviations for pneumatic controllers. Complete records were not available for rod packing replacements.	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23 Pneumatic Controllers: 1/30/24 Rod Packing: 10/30/23
8	Limestone Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 4/5/2024 (GCP Revision)	
9	Limestone Compressor Station	ENG-1 through ENG-3	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
10	Limestone Compressor Station	ENG-1 through ENG-3	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
11	Limestone Compressor Station	Engines	NSPS JJJJ Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.	Site has not kept consistent records with many of the requirements of JJJJ.	40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d) A202.F	Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing. Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	Initial Notification: 2/26/2024 Performance Testing: 11/6/2023

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
12	Limestone Compressor Station	FL-1	The permittee shall record: 1) Chronologically, all instances of alarm activation, including the date and cause of alarm activation, actions taken to bring the flare into normal operating conditions, the name of the personnel conducting the inspection, and maintenance activities. 2) The results of the Method 22 observations and flame inspection for manual flares. 3) The results of the gas analysis including H2S, VOC content, and heating value. 4) Both the hourly and monthly flow meter and flow totalizer measurements of gas sent to the flare during each flaring event. 5) Monthly, based on the data monitored and recorded in this condition and the throughput of the gas streams sent to any high pressure flare, the calculations and the basis of the calculations of the maximum hourly emission rate and the monthly total emissions in tons per month. 6) If the maximum hourly emission rate calculated in requirement 5 above, exceeds the allowable hourly emission limit, calculate and record the hourly emission rate for each hour of each flaring event of that month. 7) If one of the process parameters for a controlled unit has been exceeded, calculate and record the hourly and annual emission calculations for low and high pressure flares, to determine compliance with each applicable emission limit for that piece of equipment.	Complete records not available of alarm activation, flow rates, throughputs, calculations or comparison of process parameters to permitted values. Although dehy and fuel analyses were available, no records of flare analyses were available for this site.	A207.B	No records of alarm activation and information of event, results of Method 22, gas analysis, hourly and monthly flow sent to flare, monthly calculations, or hourly calculations.	Verified	Alarm activation is being recorded. Efforts continue to ensure the alarms are viewable in a central location.  The flare operates at low pressure and there were no identified occurrences of visible emissions requiring a Method 22 observation. Meters are installed and record flow to the flares.	12/12/2023	Pre-acquisition	Maintain compliant flare records going forward.	2/28/2024	2/28/2024
13	Limestone Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Records are not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
14	Limestone Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	Complete records are not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
1	Harrier Compressor Station	Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	6/23/2023	Pre-acquisition	Submit permit revision to update fugitive counts to be more representative.	Permit Revision: 2/23/2024 (GCP Revision)	2/22/2024
2	Harrier Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plans exist for key facilities and are in development for the remainder of facilities.	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Harrier Compressor Station	TK-1 through TK-3	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure were available, but separator pressure represented in application has been exceeded.	A205.A	Records of separator pressure were available, but separator pressure represented in application has been exceeded.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	10/25/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 2/23/2024 (GCP Revision)	2/22/2024
4	Harrier Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC. (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
5	Harrier Compressor Station	Dehy-1	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist. The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Records were unavailable of site specific extended gas analyses; Records of annual GlyCalc model inputs or results using the site specific analysis were not available, but records using a representative analysis are available for 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	No annual extended analysis was completed at the dehydrator inlet for this site going back two years. Records unavailable for previous two years of extended annual gas analyses and calculated emissions. 2022 calculations available, but only using a representative analysis	Verified	Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/29/2024	2/6/2024

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
6	Harrier Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
7	Harrier Compressor Station	Facility	NSPS OOOOa Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions. Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation. Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa 40 CFR 60.5397a(h)(4) 40 CFR 60.5420a(c)(4)(i)-(iii),(v) 40 CFR 60.5420a(c)(3)(ii)	Complete records are not available for requirements going back two years. Complete records were not available of resurveying of identified fugitive emissions. Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers. Complete records were not available of deviations for pneumatic controllers. Complete records were not available for rod packing replacements.	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23 Pneumatic Controllers: 1/30/24 Rod Packing: 10/30/23
8	Harrier Compressor Station		Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 2/23/2024 (GCP Revision)	2/22/2024
9	Harrier Compressor Station	ENG-5, ENG-6	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
10	Harrier Compressor Station	ENG-5, ENG-6	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
11	Harrier Compressor Station	Engines	NSPS JJJJ Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.	Site has not kept consistent records with many of the requirements of JJJJ.	40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d) A202.F	Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing. Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	Initial Notification: 2/23/2024 Performance Testing: 11/6/2023
12	Harrier Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
13	Harrier Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	Complete records were not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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1	Rattlesnake Compressor Station	Reboiler Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Permitted reboiler does not match reboiler on site. Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Site is permitted for one (1) 1.0 MMBtu/hr reboiler, but one (1) 0.5 MMBtu/hr reboiler was on site. Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	6/23/2023	Pre-acquisition	Submit permit revision to update reboiler rating.	Permit Revision: 4/12/2024 (GCP Revision)	
2	Rattlesnake Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plans exist for key facilities and are in development for the remainder of facilities.	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Rattlesnake Compressor Station	TK-1 and TK-2	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	10/25/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 4/12/2024 (GCP Revision)	
4	Rattlesnake Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC. (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
5	Rattlesnake Compressor Station	Dehy-1	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist. The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Records were unavailable of site specific extended gas analyses; Records of annual GlyCalc model inputs or results using the site specific analysis were not available, but records using a representative analysis are available for 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	No annual extended analysis was completed at the dehydrator inlet for this site going back two years. Records unavailable for previous two years of extended annual gas analyses and calculated emissions. 2022 calculations available, but only using a representative analysis	Verified	Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024

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6	Rattlesnake Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
7	Rattlesnake Compressor Station	Facility	NSPS OOOOa Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.  Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.  Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa 40 CFR 60.5397a(h)(4) 40 CFR 60.5420a(c)(4)(i)-(iii),(v) 40 CFR 60.5420a(c)(3)(ii)	Complete records are not available for requirements going back two years. Complete records were not available of resurveying of identified fugitive emissions. Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers. Complete records were not available of deviations for pneumatic controllers. Complete records were not available for rod packing replacements.	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23 Pneumatic Controllers: 1/30/24 Rod Packing: 10/30/23
8	Rattlesnake Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 4/12/2024 (GCP Revision)	
9	Rattlesnake Compressor Station	ENG-1 through ENG-5	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
10	Rattlesnake Compressor Station	Engines	NSPS JJJJ Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.	Site has not kept consistent records with many of the requirements of JJJJ.	40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d) A202.F	Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing. Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	Initial Notification: 2/26/2024 Performance Testing: 11/6/2023
11	Rattlesnake Compressor Station	ENG-1 through ENG-5	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
12	Rattlesnake Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Records are not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
13	Rattlesnake Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	No records of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023
14	Rattlesnake Compressor Station	TK-1 and TK-2	Table 106 does not establish facility emission limits, but establishes the eligibility criteria to register under this permit. If, at any time, these emission rates are exceeded, the applicant shall re-evaluate permit applicability.	Based on actual emissions from the tanks determined over a 12-month period, the units may cause the facility to exceed the 95 tpy threshold for VOCs (not including fugitives).	A106.B	Based on actual emissions from the tanks determined over a 12-month period, the annual VOC emissions from the tanks are higher than currently permitted.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/21/2023	Pre-acquisition	Re-evaluate permit applicability.	Permit Revision: 4/12/2024 (GCP Revision)	

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1	Seawolf Compressor Station	Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	6/23/2023	Pre-acquisition	Submit permit revision to update fugitive counts to be more representative.	Permit Revision: 4/19/2024 (GCP Revision)	
2	Seawolf Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plans exist for key facilities and are in development for the remainder of facilities.	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Seawolf Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.  (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12- month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
4	Seawolf Compressor Station	Dehy-1, Dehy-2	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
5	Seawolf Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024

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6	Seawolf Compressor Station	Facility	<p>NSPS OOOOa</p> <p>Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.</p> <p>Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.</p> <p>Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why.</p> <p>If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour.</p> <p>For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.</p> <p>Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).</p>	Site has not kept consistent records with many of the requirements of OOOOa.	<p>40 CFR 60 Subpart OOOOa</p> <p>40 CFR 60.5397a(h)(4)</p> <p>40 CFR 60.5420a(c)(4)(i)-(iii),(v)</p> <p>40 CFR 60.5420a(c)(3)(ii)</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of resurveying of identified fugitive emissions.</p> <p>Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.</p> <p>Complete records were not available of deviations for pneumatic controllers.</p> <p>Complete records were not available for rod packing replacements.</p>	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>LDAR Resurveys: 11/14/23</p> <p>Pneumatic Controllers: 1/30/24</p> <p>Rod Packing: 10/30/23</p>
7	Seawolf Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 4/19/2024 (GCP Revision)	
8	Seawolf Compressor Station	17-0723, 18-1160, 18-238	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
9	Seawolf Compressor Station	17-0723, 18-1160, 18-238	<p>Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device.</p> <p>During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation.</p> <p>The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.</p>	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	A third party vendor is responsible for this type of maintenance. Targa will coordinate with the vendor to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
10	Seawolf Compressor Station	Engines	<p>NSPS JJJJ</p> <p>Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.</p> <p>For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.</p>	Site has not kept consistent records with many of the requirements of JJJJ.	<p>40 CFR 60 Subpart JJJJ</p> <p>40 CFR 60.4245(d)</p> <p>A202.F</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of submittal of performance testing.</p> <p>Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.</p>	Verified	<p>Targa submitted initial NSPS JJJJ notifications.</p> <p>Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.</p>	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>Initial Notification: 2/26/2024</p> <p>Performance Testing: 11/6/2023</p>
11	Seawolf Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Records are not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
12	Seawolf Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	No records of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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1	Cavern Compressor Station	Truck Loading Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Vapor balance is represented in the permit, but there was no vapor balance on site. Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	The application noted that the truck loading would be controlled by vapor balance. However, no evidence of vapor loading was available during the site visit. Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	6/23/2023	Pre-acquisition	Submit permit revision.	Permit Revision: 4/19/2024 (GCP Revision)	
2	Cavern Compressor Station	T-1 and T-2	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to increase inlet separator pressure to align with planned operations.	10/25/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 4/19/2024 (GCP Revision)	
3	Cavern Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.  (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
4	Cavern Compressor Station	Dehy-1, Dehy-2	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
5	Cavern Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024

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6	Cavern Compressor Station	Facility	<p>NSPS OOOOa</p> <p>Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.</p> <p>Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.</p> <p>Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why.</p> <p>If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour.</p> <p>For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.</p> <p>Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).</p>	Site has not kept consistent records with many of the requirements of OOOOa.	<p>40 CFR 60 Subpart OOOOa</p> <p>40 CFR 60.5397a(h)(4)</p> <p>40 CFR 60.5420a(c)(4)(i)-(iii),(v)</p> <p>40 CFR 60.5420a(c)(3)(ii)</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of resurveying of identified fugitive emissions.</p> <p>Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.</p> <p>Complete records were not available of deviations for pneumatic controllers.</p> <p>Complete records were not available for rod packing replacements.</p>	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>LDAR Resurveys: 11/14/23</p> <p>Pneumatic Controllers: 1/30/24</p> <p>Rod Packing: 10/30/23</p>
7	Cavern Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 4/19/2024 (GCP Revision)	
8	Cavern Compressor Station	ENG-1 through ENG-6	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
9	Cavern Compressor Station	Engines	<p>NSPS JJJJ</p> <p>Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.</p> <p>For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.</p>	Site has not kept consistent records with many of the requirements of JJJJ.	<p>40 CFR 60 Subpart JJJJ</p> <p>40 CFR 60.4245(d)</p> <p>A202.F</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of submittal of performance testing.</p> <p>Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.</p>	Verified	<p>Targa submitted initial NSPS JJJJ notifications.</p> <p>Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.</p>	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>Initial Notification: 2/23/2024</p> <p>Performance Testing: 11/6/2023</p>
10	Cavern Compressor Station	ENG-1 through ENG-6	<p>Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device.</p> <p>During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation.</p> <p>The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.</p>	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
11	Cavern Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
12	Cavern Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	Complete records are not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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1	Grandi Compressor Station	Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	6/23/2023	Pre-acquisition	Submit permit revision to update fugitive counts to be more representative.	Permit Revision: 3/29/2024 (NSR to GCP Conversion)	
2	Grandi Compressor Station	Units 13 and 15 (Dehydrators)	A. Extended Gas Analysis and GRI-GLYCalc Calculation (Units 13 and 15) Requirement: (1) the dehydrator shall be equipped with a condenser; and (2) The permittee shall conduct an annual extended gas analysis on the dehydrator inlet gas. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc model. The permittee shall keep a record of the results, noting the emission rates for the dehydrator obtained from estimates using GRI-GLYCalc. Reporting: The permittee shall report in accordance with Section B110.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A202.A; 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
3	Grandi Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit a startup/production rate notification to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
4	Grandi Compressor Station	Facility	NSPS OOOOa  Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.  Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.  Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa  40 CFR 60.5397a(h)(4) 40 CFR 60.5420a(c)(4)(i)-(iii),(v)  40 CFR 60.5420a(c)(3)(ii)	Complete records are not available for requirements going back two years.  Complete records were not available of resurveying of identified fugitive emissions.  Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.  Complete records were not available of deviations for pneumatic controllers.  Complete records were not available for rod packing replacements.	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23  Pneumatic Controllers: 1/30/24  Rod Packing: 10/30/23
5	Grandi Compressor Station	SSM	A. Allowable emission limits for routine or predictable SSM emissions are not imposed at this time. The permittee certified that routine or predictable SSM emissions are an exempt activity per 20.2.72.202.B(5) NMAC. The permittee shall notify the Department in accordance with Condition B110.C(2), if there is a change to the regulatory status of any routine or predictable SSM emissions from the facility. The permittee shall maintain records in accordance with Condition B109.C.  If the facility has allowable SSM emission limits in the Registration Form, the permittee shall record all SSM events, including the date, the start time, the end time, a description of the event, and a description of the cause of the event. This record also shall include a copy of the manufacturer's, or equivalent, documentation showing that any maintenance qualified as scheduled. Scheduled maintenance is an activity that occurs at an established frequency pursuant to a written protocol published by the manufacturer or other reliable source. The authorization of allowable SSM emissions does not supersede any applicable federal or state standard.	Complete records are not available to demonstrate compliance with exempt status of SSM emissions.	A107.A, B109.C(2); B110.E	SSM emissions were permitted as exempt pursuant to 20.2.72.202.B(5) NMAC for a potential emission rate less than 0.5 tpy.  Consistent and complete records not available to demonstrate the SSM events at the facility remain below 0.5 tpy.  Cannot verify complete records of excess emissions are available.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/12/2023	Pre-acquisition	Calculate total annual SSM emissions for the facility and keep records to ensure the emissions are below 0.5 tpy. If above 0.5 tpy, submit a permit revision to authorize SSM emissions.	Permit Revision: 3/29/2024 (NSR to GCP Conversion)	

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6	Grandi Compressor Station	Units 5-12, 14 and 16	<p>Catalytic Converter Operation (Units 5-12)</p> <p>Requirement: Each unit shall be equipped and operated with an oxidation catalytic converter to control CO, VOC, and HAP emissions.</p> <p>The permittee shall maintain the units according to manufacturer's or supplier's recommended maintenance, including replacement of oxygen sensor as necessary for oxygen-based controllers.</p> <p>Monitoring: Each unit shall be operated with the catalytic converter, which includes catalyst maintenance periods. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine(s); or (2) replace the catalyst with a functionally equivalent spare to allow the engine to remain in operation.</p> <p>Recordkeeping: The permittee shall maintain records in accordance with Section B109.</p> <p>Reporting: The permittee shall report in accordance with Section B110.</p>	Complete records not available.	A201.C	Complete records are not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
7	Grandi Compressor Station	Engines	<p>NSPS JJJJ</p> <p>Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.</p> <p>For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.</p>	Site has not kept consistent records with many of the requirements of JJJJ.	<p>40 CFR 60 Subpart JJJJ</p> <p>40 CFR 60.4245(d)</p> <p>A201.D</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of submittal of performance testing.</p> <p>Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.</p>	Verified	<p>Targa submitted initial NSPS JJJJ notifications.</p> <p>Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.</p>	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>Initial Notification: 2/23/2024</p> <p>Performance Testing: 11/6/2023</p>
8	Grandi Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Records are not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
9	Grandi Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records not available.	B111.D(1)	Complete records not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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1	Trojan Horse Compressor Station	Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	6/23/2023	Pre-acquisition	Submit permit revision to update fugitive counts to be more representative.	Permit Revision: 3/8/2024 (GCP Revision)	
2	Trojan Horse Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM Plans exist for key facilities and are in development for the remainder of facilities.	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.		9/7/2023
3	Trojan Horse Compressor Station	Dehy-1	<p>Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent.</p> <p>Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent.</p> <p>Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed.</p> <p>Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist.</p> <p>The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or</p>	Records were unavailable of site specific extended gas analyses; Records of annual GlyCalc model inputs or results using the site specific or representative analyses were not available.	A204.B; 40 CFR 63.772(b)(2)(i)	No annual extended analysis was completed at the dehydrator inlet for this site going back two years. Records unavailable for previous two years of extended annual gas analyses and calculated emissions.	Verified	Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
4	Trojan Horse Compressor Station	Facility	<p>(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions.</p> <p>(2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC.</p> <p>(3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.</p> <p>(1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions.</p> <p>(2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions.</p> <p>(3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.</p>	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
5	Trojan Horse Compressor Station	Facility	<p>The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B):</p> <p>(1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date;</p> <p>(2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and</p> <p>(3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.</p>	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024

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6	Trojan Horse Compressor Station	Facility	<p>NSPS OOOOa</p> <p>Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.</p> <p>Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.</p> <p>Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why.</p> <p>If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour.</p> <p>For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.</p> <p>Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).</p>	Site has not kept consistent records with many of the requirements of OOOOa.	<p>40 CFR 60 Subpart OOOOa</p> <p>40 CFR 60.5397a(h)(4)</p> <p>40 CFR 60.5420a(c)(4)(i)-(iii),(v)</p> <p>40 CFR 60.5420a(c)(3)(ii)</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of resurveying of identified fugitive emissions.</p> <p>Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.</p> <p>Complete records were not available of deviations for pneumatic controllers.</p> <p>Complete records were not available for rod packing replacements.</p>	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>LDAR Resurveys: 11/14/23</p> <p>Pneumatic Controllers: 1/30/24</p> <p>Rod Packing: 10/30/23</p>
7	Trojan Horse Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 3/8/2024 (GCP Revision)	
8	Trojan Horse Compressor Station	ENG-5 through ENG-6	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
9	Trojan Horse Compressor Station	Engines	<p>NSPS JJJJ</p> <p>Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.</p> <p>For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.</p>	Site has not kept consistent records with many of the requirements of JJJJ.	<p>40 CFR 60 Subpart JJJJ</p> <p>40 CFR 60.4245(d)</p> <p>A202.F</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of submittal of performance testing.</p> <p>Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.</p>	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>Initial Notification: 2/26/2024</p> <p>Performance Testing: 11/6/2023</p>
10	Trojan Horse Compressor Station	ENG-5 through ENG-6	<p>Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device.</p> <p>During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation.</p> <p>The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.</p>	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
11	Trojan Horse Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
12	Trojan Horse Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	Complete records not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

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1	Humidor Compressor Station	Engines Fugitives Truck Loading	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Engines on site do not match what is in permit.  Fugitives are underrepresented in current permit.  Vapor balance is represented in the permit, but there was no vapor balance on site.	20.2.72.200 NMAC	The facility is permitted for three (3) CAT G3606 engines rated at 1875 hp. All three (3) CAT G3606 engines on site were rated at 1775 hp.  Based on experience at other compressor stations, the fugitive counts may be low.  The application noted that the truck loading would be controlled by vapor balance. However, no evidence of vapor loading was available during the site visit.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	6/23/2023	Pre-acquisition	Submit permit revision.	Permit Revision: 2/28/24 (GCP Revision)	2/16/2024
2	Humidor Compressor Station	Dehy-1	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Records were unavailable of site specific extended gas analyses; Records of annual GlyCalc model inputs or results using the site specific analysis were not available, but records using a representative analysis are available for 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	No annual extended analysis was completed at the dehydrator inlet for this site going back two years. Records unavailable for previous two years of extended annual gas analyses and calculated emissions. 2022 calculations available, but only using a representative analysis	Verified	Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
3	Humidor Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.  (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
4	Humidor Compressor Station	T-1, T-2	Recordkeeping: The permittee shall record the monthly total throughput of hydrocarbon liquids and the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) during the first 12 months of monitoring, the cumulative total hydrocarbon liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total hydrocarbon liquid throughput, and 2) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure. Emission rates computed using the same parameters, but with a different Department-approved calculation methodology that exceed these values will not be deemed non-compliance with this permit. Records shall specify the unit of pressure (psia or psig) and shall be consistent with the representation in the Registration Form. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A205.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	11/20/2024	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 2/28/24 (GCP Revision)	2/16/2024

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5	Humidor Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records were not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
6	Humidor Compressor Station	Facility	NSPS OOOOa Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (b)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions. Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation. Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa 40 CFR 60.5397a(h)(4) 40 CFR 60.5420a(c)(4)(i)-(iii),(v) 40 CFR 60.5420a(c)(3)(ii)	Complete records are not available for requirements going back two years. Complete records were not available of resurveying of identified fugitive emissions. Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers. Complete records were not available of deviations for pneumatic controllers. Complete records were not available for rod packing replacements.	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23 Pneumatic Controllers: 1/30/24 Rod Packing: 10/30/23
7	Humidor Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	10/25/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 2/28/24 (GCP Revision)	2/16/2024
8	Humidor Compressor Station	0851, ENG-5, ENG-6	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records were not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	10/25/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
9	Humidor Compressor Station	Engines	NSPS JJJJ Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.	Site has not kept consistent records with many of the requirements of JJJJ.	40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d) A202.F	Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing. Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	Initial Notification: 2/26/2024 Performance Testing: 11/6/2023
10	Humidor Compressor Station	0851, ENG-5, ENG-6	Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation. The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.	Complete records were not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
11	Humidor Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024

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12	Humidor Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records were not available.	B111.D(1)	No records of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023
13	Humidor Compressor Station	T-1, T-2	Table 106 does not establish facility emission limits, but establishes the eligibility criteria to register under this permit. If, at any time, these emission rates are exceeded, the applicant shall re-evaluate permit applicability.	Based on actual emissions from the tanks determined over a 12-month period, the units may cause the facility to exceed the 95 tpy threshold for VOCs (not including fugitives).	A106.B	Based on actual emissions from the tanks determined over a 12-month period, the annual VOC emissions from the tanks are higher than currently permitted.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/21/2023	Pre-acquisition	Re-evaluate permit applicability.	Permit Revision: 2/28/24 (GCP Revision)	2/16/2024

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1	Coyote Compressor Station	Reboiler Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Permitted reboiler does not match reboiler on site. Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Site is permitted for one (1) 0.75 MMBtu/hr reboiler, but one (1) 1.0 MMBtu/hr reboiler was on site. Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	6/23/2023	Pre-acquisition	Submit permit revision.	Permit Revision: 3/22/2024 (GCP Revision)	
2	Coyote Compressor Station	Dehy-1	A. 20.2.61 NMAC Opacity Limit (Units Dehy-1, 250, 252, 254, 256) Requirement: Visible emissions from all stationary combustion emission stacks shall not equal or exceed an opacity of 20 percent. Monitoring: Use of natural gas fuel constitutes compliance with 20.2.61 NMAC unless opacity equals or exceeds 20% averaged over a 10-minute period. When any visible emissions are observed during steady state operation, opacity shall be measured over a 10-minute period, in accordance with the procedures at 40 CFR 60, Appendix A, Method 9 as required by 20.2.61.114 NMAC. Recordkeeping: The permittee shall record dates of any opacity measures and the corresponding opacity readings.	Visible emissions were observed during on site audit. No process or records available demonstrating compliance with this condition.	A111.A	No records for Method 22 or Method 9 available and no process in place for ensuring compliance with this requirement based on visible emissions observed on site.	Verified	Targa has updated its daily rounds forms to ensure compliance with this requirement.	9/1/2023	Pre-acquisition	Maintain compliant records of Method 22 or Method 9 completion.		9/18/2023
3	Coyote Compressor Station	Unit Dehy-1	A. Extended Gas Analysis and GRI-GLYCalc calculation (Unit Dehy-1) Requirement: To demonstrate compliance with the allowable VOC emission limits, 1) the dehydrator shall be equipped with a Jatco A10, AC 1371 condenser, and 2) the permittee shall conduct an annual extended gas analysis on the dehydrator inlet gas. Monitoring: The permittee shall conduct an annual GRI-GlyCalc analysis using the most recent extended gas analysis, and verify the input data. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc model. The permittee shall keep a record of the results, noting the emission rates for the dehydrator obtained from estimates using GRI-GLYCalc. The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A202.A; 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
4	Coyote Compressor Station	Units T-1 and T-2	A. Tank Throughput and Separator Pressure (Units T-1 and T-2) Requirement: To demonstrate compliance with the allowable limit, total condensate throughput to the unit(s) shall not exceed 383,250 gallons per year (9,125 barrels per year) and the 12 month average separator pressure shall not exceed 75 psia. Recordkeeping: The permittee shall record: 1) the monthly total throughput of liquids, and 2) the monthly separator pressure. Each month the permittee shall use these values to calculate and record: 1) a monthly rolling, 12-month total throughput, and 2) a monthly rolling, 12-month average separator pressure. Records shall be maintained in accordance with Section B109.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A203.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	11/20/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 3/22/2024 (GCP Revision)	
5	Coyote Compressor Station	SSM	C. SSM VOC Emissions Requirement: The permittee shall perform an annual facility inlet gas analysis and complete the following recordkeeping to demonstrate compliance with SSM VOC typy emission limits. Recordkeeping: Every month the permittee shall record all routine and predictable startups and shutdowns and scheduled maintenance events. To demonstrate compliance, the permittee shall calculate the total VOC emissions on a monthly rolling 12-month basis, including the volume of total gas vented in MMscf and the percent VOC of the gas based on a gas analysis no older than one year. The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C(2) to record the duration of the SSM event shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM events.	A107.C; B109(C)(2); B110.E	Consistent and complete records not available for SSM events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM events.	2/28/2024	2/28/2024
6	Coyote Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/27/2024
7	Coyote Compressor Station	Units 250, 252, 254, 256	E. Catalytic Converter Operation (Units 250, 252, 254, 256) Requirement: The units shall be equipped and operated with an oxidation catalytic converter to control CO, VOC, and HAP emissions. Monitoring: The unit(s) shall be operated with the catalytic converter, including catalyst maintenance periods. During periods of catalyst maintenance, the permittee shall either 1) shut down the engine(s); or 2) replace the catalyst with a functionally equivalent spare to allow the engine to remain in operation.	Complete records not available.	A201.E	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024

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8	Coyote Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
9	Coyote Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records not available.	B111.D(1)	Complete records not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023
10	Coyote Compressor Station	Engines	<p>C. Periodic Testing (Units 250, 252, 254, 256) Monitoring: Test results that demonstrate compliance with the CO emission limits shall also be considered to demonstrate compliance with the VOC emission limits. (1) The monitoring period shall be once every 12-months. (2) The tests shall continue based on the existing testing schedule. (3) All subsequent monitoring shall occur in each succeeding monitoring period. No two monitoring events shall occur closer together in time than 25% of a monitoring period. (4) The permittee shall follow the General Testing Procedures of Section B111. Recordkeeping: The permittee shall maintain records in accordance with Section B109, B110, and B111.</p> <p>D. Parametric Monitoring of the Oxidation Catalyst (Units 250, 252, 254, 256) Requirement: The permittee shall comply with the allowable emission limits in Table 106.A by installing operating and maintaining an oxidation catalytic converter (catalyst) on the engines. Monitoring: The permittee shall monitor the performance of the catalyst by: (1) Monitoring the catalyst inlet temperature monthly. (2) Monitoring the differential pressure across the catalyst monthly. All subsequent monitoring shall occur in each succeeding monitoring period. No two monitoring events shall occur closer together in time than 25% of a monitoring period. The permittee shall follow the General Testing Procedures of Section B111. Recordkeeping: (1) The permittee shall keep a log of any hot engine shutdowns and any actions taken as a result of the hot engine shutdown. (2) The permittee shall record the catalyst inlet temperature no less than monthly. (3) The permittee shall record the differential pressure across the catalyst monthly.</p> <p>F. Air Fuel Ratio Operation (Units 250, 252, 254, 256) Requirement: The unit(s) shall be equipped and operated with an AFR controlling device, or similar device that performs the same function of maintaining an appropriate air-fuel ratio. The</p>	<p>Periodic tests reports were provided, but not available for all quarters.</p> <p>Complete records not available for parametric monitoring values.</p> <p>Complete records not available for AFR controlling device.</p>	A201.C	<p>Emissions testing reports were provided, but not available for every quarter.</p> <p>Complete records not available demonstrating compliance with temperature or differential pressure monitoring requirements. No engine logs or records of monthly temperature and pressure values.</p> <p>Complete records not available demonstrating compliance with monitoring conditions. No records of maintenance or replacement of oxygen sensors.</p>	Verified	<p>Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.</p> <p>Catalyst inlet temperature sensor is installed and monitored.</p>	12/12/2023	Pre-acquisition	<p>Ensure compliance with quarterly emissions testing requirement. Keep accurate records of notifications and reports.</p> <p>Install appropriate sensors if not already installed and ensure monitoring and recordkeeping requirements are satisfied.</p> <p>Install appropriate sensors if not already installed and ensure monitoring and recordkeeping requirements are satisfied.</p>	2/28/2024	11/6/2023
11	Coyote Compressor Station	Engines	<p>During startup, minimize engine idle and limit startup period to less than 30 minutes, after 30 minutes, non-startup emissions limits apply.</p> <p>You must report each instance in which you did not meet each emission limitation or operating limitation. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in § 63.6650. If you change your catalyst, you must reestablish the values of the operating parameters measured during the initial performance test. When you reestablish the values of your operating parameters, you must also conduct a performance test to demonstrate that you are meeting the required emission limitation applicable to your stationary RICE.</p> <p>Test initially to demonstrate that engine achieves at least 93% reduction in CO or a CO concentration level in exhaust of 47 ppmvd or less (at 15% oxygen). You must conduct any initial performance test or other initial compliance demonstration according to Tables 4 and 5 to this subpart that apply to you within 180 days after the compliance date that is specified for your stationary RICE in § 63.6595 and according to the provisions in § 63.7(a)(2).</p> <p>Facility can either install CPMS to continuously record and monitor catalyst inlet temperature or use a high temperature shutdown device that detects if a catalyst inlet temperature is too high to maintain the catalyst inlet temperature between 450 and 1350 F.</p>	Complete records not available.	<p>40 CFR 63.6625(h)</p> <p>40 CFR 63.6640(b)</p> <p>40 CFR 63.6640, Table 6</p>	<p>Complete records not available demonstrating compliance with startup and idle requirements.</p> <p>Complete records not available of instances where emissions limitations were not met. No records of deviations or replacement of catalysts.</p> <p>Complete records not available demonstrating compliance with CO ppmvd value or compliance testing.</p> <p>Complete records not available of CPMS installation as required by permit, or catalyst temperatures.</p>	Verified	<p>Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.</p> <p>Catalyst inlet temperature sensor is installed and monitored.</p>	12/12/2023	Pre-acquisition	<p>Ensure compliance with startup and idle requirements.</p> <p>Ensure records are kept of deviations and catalyst replacements.</p> <p>Ensure compliance testing is completed and records are available.</p> <p>Install appropriate sensors if not already installed and ensure monitoring and recordkeeping requirements are satisfied.</p>	2/28/2024	11/6/2023

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12	Coyote Compressor Station	Engines	<p>Complete notification requirements pursuant to 40 CFR 63.6645.</p> <p>(g) If you are required to conduct a performance test, you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in § 63.7(b)(1).</p> <p>(h) If you are required to conduct a performance test or other initial compliance demonstration as specified in Tables 4 and 5 to this subpart, you must submit a Notification of Compliance Status according to § 63.9(h)(2)(ii).</p> <p>(1) For each initial compliance demonstration required in Table 5 to this subpart that does not include a performance test, you must submit the Notification of Compliance Status before the close of business on the 30th day following the completion of the initial compliance demonstration.</p> <p>(2) For each initial compliance demonstration required in Table 5 to this subpart that includes a performance test conducted according to the requirements in Table 3 to this subpart, you must submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th day following the completion of the performance test according to § 63.10(d)(2).</p> <p>Complete recordkeeping requirements pursuant to 40 CFR 63.6655.</p> <p>(a) If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section.</p> <p>(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in § 63.10(b)(2)(xiv).</p> <p>(2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.</p> <p>(3) Records of performance tests and performance evaluations as required in § 63.10(b)(2)(viii).</p> <p>(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.</p> <p>(5) Records of actions taken during periods of malfunction to minimize emissions in accordance</p>	Complete records not available.	<p>40 CFR 63.6645</p> <p>40 CFR 63.6655(a)</p> <p>40 CFR 63.6650(b)(1)-(5)</p>	<p>Complete records not available of notification requirements to demonstrate compliance with MACT ZZZZ.</p> <p>Complete records not available of recordkeeping requirements to demonstrate compliance with MACT ZZZZ.</p> <p>Complete records not available of reporting requirements to demonstrate compliance with MACT ZZZZ.</p>	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with notification, recordkeeping, and reporting requirements.	2/28/2024	11/6/2023

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1	Hackberry Compressor Station	Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	6/23/2023	Pre-acquisition	Submit permit revision to update fugitive counts to be more representative.	11/30/2023	10/29/2023
2	Hackberry Compressor Station	Units 13 and 15 (Dehydrators)	A. Extended Gas Analysis and GRI-GLYCalc Calculation (Unit 13 and Unit 15) Requirement: To demonstrate compliance with the allowable VOC emission limits in Table 106.A: (1) The dehydrator shall be equipped with a BTEX condenser; and (2) The permittee shall conduct an annual extended gas analysis on the dehydrator inlet gas. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc model. The permittee shall keep a record of the results, noting the emission rates for the dehydrator obtained from estimates using GRI-GLYCalc. Reporting: The permittee shall report in accordance with Section B110.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A202.A; 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
3	Hackberry Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit a startup/production rate notification to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/24/2026
4	Hackberry Compressor Station	Facility	NSPS OOOOa  Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.  Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.  Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa 40 CFR 60.5397a(h)(4) 40 CFR 60.5420a(c)(4)(i)-(iii),(v) 40 CFR 60.5420a(c)(3)(ii)	Complete records are not available for requirements going back two years. Complete records were not available of resurveying of identified fugitive emissions. Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers. Complete records were not available of deviations for pneumatic controllers. Complete records were not available for rod packing replacements.	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23 Pneumatic Controllers: 1/30/24 Rod Packing: 10/30/23
5	Hackberry Compressor Station	SSM	A. Allowable emission limits for routine or predictable SSM emissions are not imposed at this time. The permittee certified that routine or predictable SSM emissions are an exempt activity per 20.2.72.202.B(5) NMAC. The permittee shall notify the Department in accordance with Condition B110.C(2), if there is a change to the regulatory status of any routine or predictable SSM emissions from the facility. The permittee shall maintain records in accordance with Condition B109.C.  If the facility has allowable SSM emission limits in the Registration Form, the permittee shall record all SSM events, including the date, the start time, the end time, a description of the event, and a description of the cause of the event. This record also shall include a copy of the manufacturer's, or equivalent, documentation showing that any maintenance qualified as scheduled. Scheduled maintenance is an activity that occurs at an established frequency pursuant to a written protocol published by the manufacturer or other reliable source. The authorization of allowable SSM emissions does not supersede any applicable federal or state standard.	No records available to demonstrate compliance with exempt status of SSM emissions.	A107.A; B109.C(2); B110.E	SSM emissions were permitted as exempt pursuant to 20.2.72.202.B(5) NMAC for a potential emission rate less than 0.5 tpy. No records were available to demonstrate the SSM events at the facility remain below 0.5 tpy.  Cannot verify complete records of excess emissions are available.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/12/2023	Pre-acquisition	Calculate total annual SSM emissions for the facility and keep records to ensure the emissions are below 0.5 tpy. If above 0.5 tpy, submit a permit revision to authorize SSM emissions.	Permit Revision: 2/28/2024 (Initial GCP)	10/29/2023

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6	Hackberry Compressor Station	Units 5-12	<p>C. Catalytic Converter Operation (Units 5 - 12)</p> <p>Requirement: The units shall be equipped and operated with an oxidation catalytic converter to control CO, VOC, and HAP emissions. Engines equipped with oxidation catalysts are not required to operate with an AFR.</p> <p>The permittee shall maintain the units according to manufacturer's or supplier's recommended maintenance, including replacement of oxygen sensor as necessary for oxygen-based controllers. Monitoring: Each unit shall be operated with the catalytic converter, which includes catalyst maintenance periods. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine to remain in operation.</p> <p>Recordkeeping: The permittee shall maintain records in accordance with Section B109.</p> <p>Reporting: The permittee shall report in accordance with Section B110.</p>	Complete records not available.	A201.C	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
7	Hackberry Compressor Station	Engines	<p>NSPS JJJJ</p> <p>Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.</p> <p>For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.</p>	Site has not kept consistent records with many of the requirements of JJJJ.	<p>40 CFR 60 Subpart JJJJ</p> <p>40 CFR 60.4245(d)</p> <p>A201.D</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of submittal of performance testing.</p> <p>Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.</p>	Verified	<p>Targa submitted initial NSPS JJJJ notifications.</p> <p>Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.</p>	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>Initial Notification: 2/23/2024</p> <p>Performance Testing: 11/6/2023</p>
8	Hackberry Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
9	Hackberry Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records not available.	B111.D(1)	Complete records not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023
10	Hackberry Compressor Station	Engines	<p>A. Periodic Emissions Testing (Units 5 - 12)</p> <p>Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by completing periodic emission tests during the monitoring period.</p> <p>(1) The testing shall be conducted as follows:</p> <p>(a) Testing frequency shall be once per quarter.</p> <p>(b) The monitoring period is defined as a calendar quarter.</p> <p>(2) The first test shall occur within the first monitoring period occurring after permit issuance.</p> <p>(3) All subsequent monitoring shall occur in each succeeding monitoring period. No two monitoring events shall occur closer together in time than 25% of a monitoring period.</p> <p>(4) The permittee shall follow the General Testing Procedures of Section B111.</p> <p>(5) Performance testing required by 40 CFR 60, Subpart JJJJ or 40 CFR 63, Subpart ZZZZ may be used to satisfy these periodic testing requirements if they meet the requirements of this condition and are completed during the specified monitoring period.</p> <p>Recordkeeping: The permittee shall maintain records in accordance with Section B109, B110, and B111.</p> <p>Reporting: The permittee shall report in accordance with Section B109, B110, and B111.</p>	Periodic tests reports were provided, but not available for all quarters.	A201.A	Emissions testing reports were provided, but not available for every quarter.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Ensure compliance with quarterly emissions testing requirement. Keep accurate records of notifications and reports.	2/28/2024	11/6/2023
11	Hackberry Compressor Station	Units 14 and 16 (Reboilers)	<p>A. Operational Inspections of Boilers and/or Heaters (Unit 14 &amp; Unit 16)</p> <p>Requirement:</p> <p>(1) The permittee shall maintain records of operational inspections, including the indicators used to verify optimal excess combustion air, a description of the indicators, the unit component and housing inspections, and any adjustments needed to ensure optimal operation of the unit.</p> <p>(2) The permittee shall also keep records of the manufacturer's recommended or the permittee's facility specific operational inspection procedure and shall keep records of the percent of excess combustion air required for optimal performance.</p> <p>(3) The permittee shall maintain records in accordance with Section B109.</p> <p>Reporting: The permittee shall report in accordance with Section B110.</p>	Complete records not available of operational inspections available.	A204.A	Complete not records available to demonstrate compliance with operational inspection requirement.	Verified		12/12/2023	Pre-acquisition	Ensure operational inspections are completed and records are available demonstrating compliance with requirement.	2/28/2024	1/26/2024

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1	Salt Draw Compressor Station	VRU Tanks Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Site is permitted for VRU, but the unit is not on site.  Multiple tanks on site, that were not authorized in the permit.  Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Site is permitted for VRU in conjunction with VRT. The VRU has been removed from the site.  Multiple tanks were on site that were not included in the permit including: 1000 bbl methanol tanks, lube oil tank, glycol tank. These units should be included as exempt sources.  Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	6/23/2023	Pre-acquisition	Submit permit revision.	Permit Revision: 3/1/2024 (Significant Revision)	
2	Salt Draw Compressor Station	Dehy-1 and Dehy-2	A. Extended Gas Analysis and GRI-GLYCalc calculation (Units Dehy-1 and Dehy -2) Requirement: Compliance with the allowable VOC emission limits in Table 106.A shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc model. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc. Reporting: The permittee shall report in accordance with Section B110.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A202.A; 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	10/30/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
3	Salt Draw Compressor Station	SSM	C. SSM Emissions Recordkeeping: To demonstrate compliance, each month records shall be kept of the cumulative total of VOC emissions during the first 12 months and, thereafter of the monthly rolling 12 month total of VOC emissions. Records shall also be kept of the inlet gas analysis, the percent VOC of the gas based on the most recent gas analysis and of the volume of total gas vented in MMscf used to calculate the VOC emissions. The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC. Reporting: The permittee shall report in accordance with Section B110.	Consistent and complete records not available for SSM events.	A107.C; B109(C)(2); B110.E	Consistent and complete records not available for SSM events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM events.	2/28/2024	2/28/2024
4	Salt Draw Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records not available	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
5	Salt Draw Compressor Station	Facility	NSPS OOOOa  Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.  Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed. Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why. If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour. For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.  Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).	Site has not kept consistent records with many of the requirements of OOOOa.	40 CFR 60 Subpart OOOOa  40 CFR 60.5397a(h)(4)  40 CFR 60.5420a(c)(4)(i)-(iii),(v)  40 CFR 60.5420a(c)(3)(ii)	Complete records not available for requirements going back two years.  Complete records were not available of resurveying of identified fugitive emissions.  Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.  Complete records were not available of deviations for pneumatic controllers.  Complete records were not available for rod packing replacements.	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	LDAR Resurveys: 11/14/23  Pneumatic Controllers: 1/30/24  Rod Packing: 10/30/23

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6	Salt Draw Compressor Station	Units 232, 234, 236, 238, 240, 242, 244, & 246	D. Catalytic Converter Operation (Units 232, 234, 236, 238, 240, 242, 244, & 246) Monitoring: The units shall be operated with the catalytic converter, which includes catalyst maintenance periods. During periods of catalyst maintenance, the permittee shall either (1) shut down the engine(s); or (2) replace the catalyst with a functionally equivalent spare to allow the engine to remain in operation. Recordkeeping: The permittee shall maintain records in accordance with Section B109. Reporting: The permittee shall report in accordance with Section B110.	Complete records not available.	A201.D	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
7	Salt Draw Compressor Station	Engines	NSPS JJJJ Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed. For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart III and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.	Site has not kept consistent records with many of the requirements of JJJJ.	40 CFR 60 Subpart JJJJ 40 CFR 60.4245(d) A201.E	Complete records are not available for requirements going back two years. Complete records were not available of submittal of performance testing. Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	Initial Notification: 2/26/2024 Performance Testing: 11/6/2023
8	Salt Draw Compressor Station	Units T-1, T-2 and T-4, VRU/VRT	D. Vapor Recovery Unit/Vapor Recovery Tower (Units T-1, T-2, and T-4) Requirement: The vapor recovery unit (VRU)/vapor recovery tower (VRT) shall control all emissions from Units T-1, T-2, and T-4 and the tanks shall not vent to the atmosphere. The tanks shall not operate unless the VRU/VRT is collecting all emissions from T-1, T-2, and T-4. If the units T-1, T-2, and T-4 operate without the VRU/VRT, the permittee shall submit an excess emission report under 20.2.7 NMAC. The VRU shall be equipped with a pressure sensor that powers on when the tanks are in use. Recordkeeping: The permittee shall record the results of the VRU/VRT and T-1, T-2, and T-4 inspections chronologically, noting any maintenance or repairs that are required. Reporting: The permittee shall report in accordance with Section B110.	No vapor recovery tower or unit on site. Tanks are vented to the atmosphere.	A204.D	Tanks are operating as uncontrolled, even though they are permitted as controlled.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/12/2023	Pre-acquisition	Re-permit tanks at facility and evaluate control options.	Permit Revision: 3/1/2024 (Significant Revision)	
9	Salt Draw Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Records are not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
10	Salt Draw Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records not available.	B111.D(1)	Complete records not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
1	Cadillac Compressor Station	Fugitives	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Fugitives are underrepresented in current permit.	20.2.72.200 NMAC	Based on experience at other compressor stations, the fugitive counts may be low.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	6/23/2023	Pre-acquisition	Submit permit revision to update fugitive counts to be more representative.	Permit Revision: 3/15/2024 (Significant Revision)	
2	Cadillac Compressor Station	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.B	No SSM plan available for this facility.	Verified	SSM plan developed	9/1/2023	Pre-acquisition	Develop and implement SSM plan for facility.	9/29/2023	9/28/2023
3	Cadillac Compressor Station	SSM & Malfunction	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.  (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/12/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
4	Cadillac Compressor Station	Dehy-1	A. Extended Gas Analysis and ProMax calculation (Unit Dehy-1) Requirement: The permittee shall demonstrate compliance with the allowable VOC emission limits in Table 106.A by conducting an extended gas analysis on the dehydrator inlet gas annually based on a calendar year and by calculating emissions using ProMax. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the ProMax model. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using ProMax.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Complete records not available for the past two years. Site specific analysis and calculations available for only 2022.	A202.A; 40 CFR 63.772(b)(2)(i)	Records of site specific extended analysis and emission calculations only available for 2022. An extended analysis and calculations were not available for 2021.	Verified	The site-specific extended analysis was used to perform the calculations for 2022. Going forward Targa will acquire an annual site specific sample to complete emission calculations.	11/20/2023	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
5	Cadillac Compressor Station	Units TK-1, TK-2, TK-3 and TK-4	A203 Tanks Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by limiting the monthly rolling 12-month total condensate throughput to the units to 2,446,668 gallons per year (58,254 barrels/year) and limiting the monthly rolling 12-month average separator pressure to less than 66 psia. Recordkeeping: The permittee shall record: (1) the monthly total throughput of liquids and, (2) Each month the permittee shall use these values to calculate and record: (a) during the first 12 months of monitoring, the cumulative total liquid throughput and after the first 12 months of monitoring, the monthly rolling 12-month total liquid throughput and, (b) during the first 12 months of monitoring, the average separator pressure, and after the first 12 months of monitoring, the monthly rolling 12-month average separator pressure.	Records of separator pressure and throughput were available, but separator pressure represented in application has been exceeded.	A203.A	Records were available to verify 12-month throughput and separator pressure, but data shows exceedances of permitted representations.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	11/20/2023	Pre-acquisition	Review current calculations and permit representation to determine if facility needs to be re-permitted.	Permit Revision: 3/15/2024 (Significant Revision)	
6	Cadillac Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date																																																																			
7	Cadillac Compressor Station	Facility	<p>NSPS OOOOa</p> <p>Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.</p> <p>Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.</p> <p>Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why.</p> <p>If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour.</p> <p>For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.</p> <p>Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).</p>	Site has not kept consistent records with many of the requirements of OOOOa.	<p>40 CFR 60 Subpart OOOOa</p> <p>40 CFR 60.5397a(h)(4)</p> <p>40 CFR 60.5420a(c)(4)(i)-(iii),(v)</p> <p>40 CFR 60.5420a(c)(3)(ii)</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of resurveying of identified fugitive emissions.</p> <p>Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.</p> <p>Complete records were not available of deviations for pneumatic controllers.</p> <p>Complete records were not available for rod packing replacements.</p>	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>LDAR Resurveys: 11/14/23</p> <p>Pneumatic Controllers: 1/30/24</p> <p>Rod Packing: 10/30/23</p>																																																																			
8	Cadillac Compressor Station	Engines	<p>NSPS JJJJ</p> <p>Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.</p>	Site has not kept consistent records with many of the requirements of JJJJ.	<p>40 CFR 60 Subpart JJJJ</p> <p>40 CFR 60.4245(d)</p> <p>A201.E, A201.F</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of submittal of performance testing.</p>	Verified	<p>Targa submitted initial NSPS JJJJ notifications.</p> <p>Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.</p>	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>Initial Notification: 2/23/2024</p> <p>Performance Testing: 11/6/2023</p>																																																																			
9	Cadillac Compressor Station		<p>D. Catalytic Converter Operation (Units 18-0246, 18-0296, 18-0304, 18-0341, 18-0342, 18-0345, ENG-1, ENG-2, ENG-8, ENG-9, ENG-10 and ENG-11)</p> <p>Requirement: The units shall be equipped and operated with an oxidation catalytic converter to control CO, VOC, and HAP emissions. Engines equipped with oxidation catalysts are not required to operate with an AFR.</p> <p>Monitoring: The units shall be operated with the catalytic converter, which includes catalyst maintenance periods. During periods of catalyst maintenance, the permittee shall either (1) shut down the engines; or (2) replace the catalyst with a functionally equivalent spare to allow the engine to remain in operation.</p>	Complete records not available.	A201.D	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024																																																																			
10	Cadillac Compressor Station	Units 18-0246, 18-0296, 18-0304, 18-0341, 18-0342, 18-0345, ENG-1, ENG-2, ENG-8, ENG-9, ENG-10 and ENG-11	<p>Requirement: The permittee shall install only one alternative operating scenario at a time from the list of options specified in Table 113.A.</p> <p>The permittee shall notify the Department of the following:</p> <ol style="list-style-type: none"> <li>the engine models/options selected and the dates of installation of each unit within 60 days of installation; and</li> <li>the resulting total allowable emissions from the facility.</li> </ol>	Complete records not available of engine models/options provided to the department, dates of installation, or resulting total allowable emissions.	A201.A	Complete records not available to demonstrate compliance with the alternate operating scenario requirements listed in the permit.	Verified	Cadillac will be re-permitted and the AOS will be removed from the permit.	12/12/2023	Pre-acquisition	Submit notification to NMED regarding alternate operating scenario chosen and required information including allowable emissions.	Permit Revision: 3/15/2024 (Significant Revision)																																																																				
			<table border="1"> <caption>Table 113.A: Alternative operating scenarios</caption> <thead> <tr> <th colspan="2">AOS 1</th> <th colspan="2">AOS 2 (Engine configuration)</th> </tr> </thead> <tbody> <tr> <td>• 18-0246</td> <td>• ENG-11</td> <td>• 18-0341</td> <td>• ENG-10</td> </tr> <tr> <td>• 18-0296</td> <td>• Deby -1</td> <td>• 18-0246</td> <td>• Deby -1</td> </tr> <tr> <td>• 18-0304</td> <td>• Rbl -1</td> <td>• 18-0296</td> <td>• Rbl -1</td> </tr> <tr> <td>• ENG-1</td> <td>• TK 1-TK 4</td> <td>• 18-0304</td> <td>• TK 1-TK 4</td> </tr> <tr> <td>• ENG-2</td> <td>• LOAD</td> <td>• ENG-1</td> <td>• LOAD</td> </tr> <tr> <td>• ENG-8</td> <td>• FUG</td> <td>• ENG-8</td> <td>• FUG</td> </tr> <tr> <td>• ENG-9</td> <td>• SSM/M</td> <td>• ENG-8</td> <td>• SSM/M</td> </tr> <tr> <td>• ENG-10</td> <td></td> <td>• ENG-9</td> <td></td> </tr> <tr> <td>• 18-0341</td> <td>• ENG-9</td> <td>• 18-0341</td> <td>• ENG-8</td> </tr> <tr> <td>• 18-0342</td> <td>• Deby -1</td> <td>• 18-0342</td> <td>• Deby -1</td> </tr> <tr> <td>• 18-0246</td> <td>• Rbl -1</td> <td>• 18-0345</td> <td>• Rbl -1</td> </tr> <tr> <td>• 18-0296</td> <td>• TK 1-TK 4</td> <td>• 18-0246</td> <td>• TK 1-TK 4</td> </tr> <tr> <td>• 18-0304</td> <td>• LOAD</td> <td>• 18-0296</td> <td>• LOAD</td> </tr> <tr> <td>• ENG-1</td> <td>• FUG</td> <td>• 18-0304</td> <td>• FUG</td> </tr> <tr> <td>• ENG-2</td> <td>• SSM/M</td> <td>• ENG-1</td> <td>• SSM/M</td> </tr> <tr> <td>• ENG-8</td> <td></td> <td>• ENG-2</td> <td></td> </tr> </tbody> </table>	AOS 1		AOS 2 (Engine configuration)		• 18-0246	• ENG-11	• 18-0341	• ENG-10	• 18-0296	• Deby -1	• 18-0246	• Deby -1	• 18-0304	• Rbl -1	• 18-0296	• Rbl -1	• ENG-1	• TK 1-TK 4	• 18-0304	• TK 1-TK 4	• ENG-2	• LOAD	• ENG-1	• LOAD	• ENG-8	• FUG	• ENG-8	• FUG	• ENG-9	• SSM/M	• ENG-8	• SSM/M	• ENG-10		• ENG-9		• 18-0341	• ENG-9	• 18-0341	• ENG-8	• 18-0342	• Deby -1	• 18-0342	• Deby -1	• 18-0246	• Rbl -1	• 18-0345	• Rbl -1	• 18-0296	• TK 1-TK 4	• 18-0246	• TK 1-TK 4	• 18-0304	• LOAD	• 18-0296	• LOAD	• ENG-1	• FUG	• 18-0304	• FUG	• ENG-2	• SSM/M	• ENG-1	• SSM/M	• ENG-8		• ENG-2										
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11	Cadillac Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records are not available for requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024																																																																			
12	Cadillac Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records are not available.	B111.D(1)	Complete records not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023																																																																			

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
13	Cadillac Compressor Station	Engines	<p>B. Periodic Emissions Testing (Units 18-0246, 18-0296, 18-0304, 18-0341, 18-0342, 18-0345, ENG-1, ENG-2, ENG-8, ENG-9, ENG-10 and ENG-11)</p> <p>Monitoring: The permittee shall test using a portable analyzer or EPA Reference Methods subject to the requirements and limitations of Section B 108, General Monitoring Requirements. Emission testing is required for NOx and CO and shall be carried out as described below.</p> <p>(1) The testing shall be conducted as follows:                      (a) Testing frequency shall be once per quarter                      (b) The monitoring period is defined as a calendar quarter.</p> <p>(2) The first test shall occur within the first monitoring period occurring after permit issuance for Units 18-0246, 18-0296, 18-0304, 18-0341, 18-0342 and 18-0345 and within the first monitoring period after completion of the initial compliance test for Units ENG-1, ENG-2, ENG-8, ENG-9, ENG-10 and ENG-11.</p> <p>(3) All subsequent monitoring shall occur in each succeeding monitoring period. No two monitoring events shall occur closer together in time than 25% of a monitoring period.</p>	Periodic tests reports were provided, but not available for all quarters.	A201.B	Emissions testing reports were provided, but not available for every quarter. Some stack tests not available for Q4 2022.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Ensure compliance with quarterly emissions testing requirement. Keep accurate records of notifications and reports.	2/28/2024	11/6/2023

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
1	Dogtown Compressor Station	RBL-1	All sources of air contaminant emissions must be authorized by the appropriate permitting mechanism.	Permitted reboiler does not match reboiler on site.	20.2.72.200 NMAC	Site is permitted for one (1) 1.0 MMBtu/hr reboiler, but one (1) 0.5 MMBtu/hr reboiler was on site.	Verified	Permit revisions will be submitted per the schedule blessed by the AQB Permitting Section Manager.	12/6/2023	Pre-acquisition	Submit permit revision to update reboiler rating.	Permit Revision: 4/26/2024 (GCP Revision)	
2	Dogtown Compressor Station	Facility	Compliance with the annual emission limits in the Registration Form shall be demonstrated during the first twelve months of operation on a cumulative monthly basis, and after the first twelve months, on a monthly rolling 12-month total basis. The permittee shall record in accordance with Section B109.	Complete records unavailable for 12-month rolling emissions.	A106.C	Complete records not available for 12-month rolling emissions.	Verified	Permit revision will be submitted to align permitted representations with planned operations.	12/12/2023	Pre-acquisition	Maintain compliant 12-month rolling emissions totals.	Permit Revision: 4/26/2024 (GCP Revision)	
3	Dogtown Compressor Station	Facility	(1) To demonstrate compliance, each month records shall be kept of the cumulative total of malfunction VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total VOC emissions. (2) Records shall also be kept of the percent VOC of the gas based on the most recent gas analysis, of the volume of total gas vented in MMscf used to calculate the VOC emissions, and whether the emissions resulting from the event will be used toward the permitted malfunction emission limit or whether the event is reported as excess emissions of the ton per year limit in the Registration Form under 20.2.7 NMAC. (3) The permittee shall record the demonstrated compliance in accordance with Condition B109, except the requirement in B109.C to record the start and end times of malfunction events shall not apply to the venting of known quantities of VOC.  (1) To demonstrate compliance, each month records shall be kept of the cumulative total of SSM VOC emissions during the first 12 months and, thereafter of the monthly rolling 12-month total SSM VOC emissions. (2) Records shall also be kept of the percent VOC and H2S of the gas based on the most recent gas analysis, and of the volume of total gas vented in MMscf used to calculate the SSM VOC emissions. (3) The permittee shall maintain records in accordance with Condition B109, except the requirement in B109.C to record the start and end times of SSM events shall not apply to the venting of known quantities of VOC.	Consistent and complete records not available for SSM/M events.	A107.D, A107.E; B109.C(2); B109.C(3); B110.E	Consistent and complete records not available for SSM/M events.	Verified	Process have been developed and implemented to ensure SSM and Malfunction events are reported timely. Rolling 12 month SSM and Malfunction emission totals have been developed developed.	12/6/2023	Pre-acquisition	Maintain compliant records for SSM/M events.	2/28/2024	2/28/2024
4	Dogtown Compressor Station	Dehy-1	Requirement: Compliance with the allowable emission limits in the Registration Form shall be demonstrated by conducting an annual extended gas analysis on the dehydrator inlet gas and by calculating emissions using GRI-GLYCalc or Department-approved equivalent. Recordkeeping: The permittee shall identify in a summary table all parameters that were used as inputs in the GRI-GLYCalc or equivalent software model. A printout of calculation inputs will suffice as the summary table. The permittee shall keep a record of the results, noting the VOC and HAP emission rates for the dehydrator obtained from estimates using GRI-GLYCalc or equivalent. Monitoring: The permittee shall inspect the glycol dehydrator, the piping to any capture or control equipment, and any capture and control equipment semi-annually to ensure it is operating as designed. Recordkeeping: The permittee shall record the inspection, the name of the inspector, and the results of all equipment and control device inspections chronologically, noting any maintenance or repairs needed to bring the dehydrator into compliance. The permittee shall maintain a copy of the control device and VRU maintenance recommendations, and the annual maintenance program or checklist.  The owner or operator shall determine actual average benzene or BTEX emissions using the model GRI-GLYCalc TM, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc TM Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or	Records were unavailable of site specific extended gas analyses; Records of annual GlyCalc model inputs or results using the site specific analysis were not available, but records using a representative analysis are available for 2022.	A204.B; 40 CFR 63.772(b)(2)(i)	No annual extended analysis was completed at the dehydrator inlet for this site going back two years. Records unavailable for previous two years of extended annual gas analyses and calculated emissions. 2022 calculations available, but only using a representative analysis	Verified	Going forward Targa will acquire an annual site specific sample to complete emission calculations.	12/6/2024	Pre-acquisition	Complete calculations for VOC and HAP emission rate along with summary table of parameters and maintain compliant records.	2/28/2024	2/6/2024
5	Dogtown Compressor Station	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records not available.	B110.B	Complete records not available of notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/6/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
6	Dogtown Compressor Station	Facility	<p>NSPS OOOOa</p> <p>Each identified source of fugitive emissions must be resurveyed to complete repair according to the requirements in paragraphs (h)(4)(i) through (iv) of this section, to ensure that there are no fugitive emissions.</p> <p>Records of the month and year of installation, reconstruction, or modification, location in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983, identification information that allows traceability to the records required in paragraph (c)(4)(iii) or (iv) of this section and manufacturer specifications for each pneumatic controller constructed, modified, or reconstructed.</p> <p>Records of the demonstration that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than the applicable standard are required and the reasons why.</p> <p>If the pneumatic controller is not located at a natural gas processing plant, records of the manufacturer's specifications indicating that the controller is designed such that natural gas bleed rate is less than or equal to 6 standard cubic feet per hour.</p> <p>For each instance where the pneumatic controller was not operated in compliance with the requirements specified in § 60.5390a, a description of the deviation, the date and time the deviation began, and the duration of the deviation.</p> <p>Records of the date and time of each reciprocating compressor rod packing replacement, or date of installation of a rod packing emissions collection system and closed vent system as specified in § 60.5385a(a)(3).</p>	Site has not kept consistent records with many of the requirements of OOOOa.	<p>40 CFR 60 Subpart OOOOa</p> <p>40 CFR 60.5397a(h)(4)</p> <p>40 CFR 60.5420a(c)(4)(i)-(iii),(v)</p> <p>40 CFR 60.5420a(c)(3)(ii)</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of resurveying of identified fugitive emissions.</p> <p>Complete records were not available demonstrating compliance with the date of installation, location, bleed rate information or other required data for the pneumatic controllers.</p> <p>Complete records were not available of deviations for pneumatic controllers.</p> <p>Complete records were not available for rod packing replacements.</p>	Verified	OOOOa record keeping process implemented.	12/12/2023	Pre-acquisition	Maintain continuous complaint records for the facility moving forward.	2/28/2024	<p>LDAR Resurveys: 11/14/23</p> <p>Pneumatic Controllers: 1/30/24</p> <p>Rod Packing: 10/30/23</p>
7	Dogtown Compressor Station	17-0537, ENG-2	The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.	Complete records not available.	A202.E	Complete records not available for monitoring, recordkeeping, and reporting as required under MACT ZZZZ.	Verified	Targa's process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	11/6/2023
8	Dogtown Compressor Station	17-0537, ENG-2	<p>Each unit equipped and operated with an oxidation catalytic converter, non-selective catalytic converter, or other control device specified in the Registration Form, shall comply with the requirements of this condition. Except for recommended burn-in period for catalysts, the units may not be operated in normal service without the control device.</p> <p>During periods of catalyst maintenance, the permittee shall either (1) shut down the engine or turbine; or (2) replace the catalyst with a functionally equivalent spare to allow the engine or turbine to remain in operation.</p> <p>The permittee shall maintain the units per the manufacturers supplier's or permittee's recommended maintenance. Maintain records in accordance with B109 and report in accordance with B110.</p>	Complete records not available.	A202.H, B109, B110	Complete records not available of monitoring, recordkeeping, or reporting regarding catalytic converters at facility.	Verified	Targa has implemented processes to ensure records are complete and being maintained.	12/12/2023	Pre-acquisition	Comply with monitoring, recordkeeping, and reporting requirements going forward.	2/28/2024	2/22/2024
9	Dogtown Compressor Station	Engines	<p>NSPS JJJJ</p> <p>Owners and operators of stationary SI ICE that are subject to performance testing must submit a copy of each performance test as conducted in § 60.4244 within 60 days after the test has been completed.</p> <p>For units subject to 40 CFR 60, Subparts A and JJJJ, the permittee shall comply with the notification requirements in Subpart A and the specific requirements of Subpart IIII and/or JJJJ. The permittee shall comply with all applicable monitoring, recordkeeping, and reporting requirements in 40 CFR 60, Subpart A and JJJJ.</p>	Site has not kept consistent records with many of the requirements of JJJJ.	<p>40 CFR 60 Subpart JJJJ</p> <p>40 CFR 60.4245(d)</p> <p>A202.F</p>	<p>Complete records are not available for requirements going back two years.</p> <p>Complete records were not available of submittal of performance testing.</p> <p>Complete records not available for initial notification, monitoring, recordkeeping, and reporting as required under NSPS JJJJ.</p>	Verified	Targa submitted initial NSPS JJJJ notifications. Targa's performance testing process has been updated to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain continuous compliant records for the facility moving forward.	2/28/2024	<p>Initial Notification: 2/23/2024</p> <p>Performance Testing: 11/6/2023</p>
10	Dogtown Compressor Station	Facility	General recordkeeping requirements	Site has not kept consistent records for many permit provisions.	B109	Complete records not available for all requirements going back two years.	Verified	Targa has implemented and updated many processes throughout the audit period to ensure notifications, testing, recordkeeping, and reporting occurs on the appropriate schedule.	12/12/2023	Pre-acquisition	Maintain consistent records for facility.	2/28/2024	2/28/2024
11	Dogtown Compressor Station	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	No compliant records.	B111.D(1)	Complete records not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023

FINDING #	Site	Unit	Requirement	Violation	Citation and Permit Provisions	Description of Finding	Finding Status	Targa Comments	Violation Discovery Date	Violation Start Date	Corrective Action	Schedule or Target Completion Date	Violation Status Completion or Actual Completion Date
1	Palo Duro Gas Processing Facility	Facility	The establishment of permitted startup, shutdown, and maintenance (SSM) emission limits does not supersede the requirements of 20.2.7.14.A NMAC. Except for operations or equipment subject to Condition B106, the permittee shall establish and implement a plan to minimize emissions during routine or predictable start up, shut down, and scheduled maintenance (SSM work practice plan) and shall operate in accordance with the procedures set forth in the plan. (SSM work practice plan) (20.2.7.14.A NMAC)	No SSM plan available for facility.	B107.A	No SSM plan available for this facility.	Verified	SSM plan developed	12/12/2023	Pre-acquisition	Develop and implement SSM plan for facility.	2/28/2024	1/31/2023
2	Palo Duro Gas Processing Facility	Facility	The permittee shall notify the Air Quality Bureau's Compliance and Enforcement Section using the current Submittal Form posted to NMED's Air Quality web site under Compliance and Enforcement/Submittal Forms in writing of, or provide the Department with (20.2.72.212.A and B): (1) the anticipated date of initial startup of each new or modified source not less than thirty (30) days prior to the date. Notification may occur prior to issuance of the permit, but actual startup shall not occur earlier than the permit issuance date; (2) after receiving authority to construct, the equipment serial number as provided by the manufacturer or permanently affixed if shop-built and the actual date of initial startup of each new or modified source within fifteen (15) days after the startup date; and (3) the date when each new or modified emission source reaches the maximum production rate at which it will operate within fifteen (15) days after that date.	Complete records not available.	B110.B	Complete records not available notification of initial startup or maximum production rate.	Verified	Targa will submit startup/production rate notifications to ensure notifications for all equipment onsite have been completed.	12/12/2023	Pre-acquisition	Complete required notifications and maintain compliant records.	2/28/2024	2/26/2024
3	Palo Duro Gas Processing Facility	Facility	The permittee shall notify the Program Manager of the Air Quality Bureau's Compliance and Enforcement Section consistent with the Section's current published reporting procedures.	Complete records not available.	B111.D(1)	Complete records not available of AQB initial test notifications for compliance tests within past two years. Initial notification needs to be provided prior to the test being completed.	Verified	Targa's process has been updated to ensure notifications and recordkeeping occur on the appropriate schedule.	12/12/2023	Pre-acquisition	Submit notifications to AQB for compliance tests to be completed at the facility.	2/28/2024	11/6/2023