1512 Larimer Street
Suite 540
Denver, CO 80202
PH: 303.626.8290

March 18, 2022

Ms. Kirby Olson
Major Source Program Manager
Air Quality Bureau
New Mexico Environment Department
525 Camino De los Marquez, Suite 1
Santa Fe, New Mexico 87505

Re: Title V Permit Application Revision for the 3Bear Libby Gas Plant

Dear Ms. Olson,

This application and accompanying material is a revision to the initial Title V Operating Permit application for the 3Bear Libby Gas Plant (Libby), owned and operated by 3 Bear Delaware Operating – NM, LLC (3Bear). The initial Title V permit application was submitted September 11, 2019, and 3Bear is herein amending that application to reflect modifications to the facility as incorporated in the NSR Permit No. 7482M2 (M2). This modification includes the following:

- Updated permit application forms incorporating the M2 modifications
- Updated insignificant activities list
- Compliance Assurance Monitoring Plans for the amine unit (AMINE-1) and the gunbarrel (TK-1)

If you have any questions regarding this submittal, please contact me at (303) 882-4404 or lklein@3BearLLC.com.

Sincerely,

Elisabeth Klein
Director, EHS Regulatory Compliance
3 Bear Delaware Operating – NM, LLC
1512 Larimer St. Suite 540
Denver, CO 80202
Cell: (303) 882-4404

Attachment A – Updated UA1 Form
Attachment B – Updated UA2 Form
Attachment C – Updated UA3 Form
Attachment D – Compliance Assurance Monitoring Plans

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Attachment A

Updated UA1 Form

Mail Application To:		**For Department use only:**
New Mexico Environment Department Air Quality Bureau Permits Section 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico, 87505 Phone: (505) 476-4300 Fax: (505) 476-4375 www.env.nm.gov/aqb		AIRS No.:

Universal Air Quality Permit Application

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

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

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

Acknowledgements:
☑ I acknowledge that a pre-application meeting is available to me upon request. ☑ Title V Operating, Title IV Acid Rain, and NPR applications have no fees.
☐ $500 NSR application Filing Fee enclosed OR ☐ The full permit fee associated with 10 fee points (required w/ streamline applications).
☐ Check No.: in the amount of
☑ I acknowledge the required submittal format for the hard copy application is printed double sided 'head-to-toe', 2-hole punched (except the Sect. 2 landscape tables is printed 'head-to-head'), numbered tab separators. Incl. a copy of the check on a separate page.
☐ This facility qualifies to receive assistance from the Small Business Environmental Assistance program (SBEAP) and qualifies for 50% of the normal application and permit fees. Enclosed is a check for 50% of the normal application fee which will be verified with the Small Business Certification Form for your company.
☐ This facility qualifies to receive assistance from the Small Business Environmental Assistance Program (SBEAP) but does not qualify for 50% of the normal application and permit fees. To see if you qualify for SBEAP assistance and for the small business certification form go to https://www.env.nm.gov/aqb/sbap/small_business_criteria.html).

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

Section 1 – Facility Information

Section 1-A: Company Information

		AI # if known (see 1st 3 to 5 #s of permit IDEA ID No.): 38067	Updating Permit/NOI #: New TV
1	Facility Name: 3Bear Libby Gas Plant	Plant primary SIC Code (4 digits): 1321	
		Plant NAIC code (6 digits): 211130	
a	Facility Street Address (If no facility street address, provide directions from a prominent landmark): From the intersection of US-180 W/US-62 and W/W Marland Blvd in Hobbs, NM, head west on US-180 W/US-62 for 22.6 miles. Turn Left (Southerly) onto Co Rd 27A for 6.5 miles. The facility location will be on the right.		

2	Plant Operator Company Name: 3 Bear Delaware Operating – NM, LLC	Phone/Fax: (303) 626-8290
a	Plant Operator Address: 1512 Larimer St. Suite 540, Denver, CO 80202	
b	Plant Operator's New Mexico Corporate ID or Tax ID: 5501695	
3	Plant Owner(s) name(s): 3 Bear Delaware Operating – NM, LLC	Phone/Fax: (303) 626-8290
a	Plant Owner(s) Mailing Address(s): 1512 Larimer St. Suite 540, Denver, CO 80202	
4	Bill To (Company): 3 Bear Delaware Operating – NM, LLC	Phone/Fax: (303) 626-8290
a	Mailing Address: 1512 Larimer St. Suite 540, Denver, CO 80202	E-mail: info@3bearllc.com
5	☐ Preparer: ☑ Consultant: Barr Engineering Co.	Phone/Fax: (303) 503-4735
a	Mailing Address: 225 E 16th Ave Suite 500, Denver, CO 80203	E-mail: LMarquez@barr.com
6	Plant Operator Contact: Stephanie Swanson	Phone/Fax: (303) 862-3967
a	Address: 1512 Larimer St. Suite 540, Denver, CO 80202	E-mail: stephanie@3bearllc.com
7	Air Permit Contact: Lori Marquez	Title: Senior Air Quality Consultant
a	E-mail: LMarquez@barr.com	Phone/Fax: (303) 503-4735
b	Mailing Address: 225 E 16th Ave Suite 500, Denver, CO 80203	
c	The designated Air permit Contact will receive all official correspondence (i.e. letters, permits) from the Air Quality Bureau.	

Section 1-B: Current Facility Status

1.a	Has this facility already been constructed? ☑ Yes ☐ No	1.b If yes to question 1.a, is it currently operating in New Mexico? ☑ Yes ☐ No
2	If yes to question 1.a, was the existing facility subject to a Notice of Intent (NOI) (20.2.73 NMAC) before submittal of this application? ☐ Yes ☑ No	If yes to question 1.a, was the existing facility subject to a construction permit (20.2.72 NMAC) before submittal of this application? ☒ Yes ☐ No
3	Is the facility currently shut down? ☐ Yes ☑ No	If yes, give month and year of shut down (MM/YY):
4	Was this facility constructed before 8/31/1972 and continuously operated since 1972? ☐ Yes ☑ No	
5	If Yes to question 3, has this facility been modified (see 20.2.72.7.P NMAC) or the capacity increased since 8/31/1972? ☐Yes ☐No ☑N/A	
6	Does this facility have a Title V operating permit (20.2.70 NMAC)? ☐ Yes ☑ No	If yes, the permit No. is: P-
7	Has this facility been issued a No Permit Required (NPR)? ☐ Yes ☑ No	If yes, the NPR No. is:
8	Has this facility been issued a Notice of Intent (NOI)? ☐ Yes ☑ No	If yes, the NOI No. is:
9	Does this facility have a construction permit (20.2.72/20.2.74 NMAC)? ☑ Yes ☐ No	If yes, the permit No. is: 7482M2
10	Is this facility registered under a General permit (GCP-1, GCP-2, etc.)? ☐ Yes ☑ No	If yes, the register No. is:

Section 1-C: Facility Input Capacity & Production Rate

1	What is the facility's maximum input capacity, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: 3.5 MMscf	Daily: 85 MMScf	Annually: 31,025 MMScf
b	Proposed	Hourly: 3.5 MMscf	Daily: 85 MMScf	Annually: 31,025 MMScf

2	What is the facility's maximum production rate, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: 3.5 MMscf	Daily: 85 MMScf	Annually: 31,025 MMScf
b	Proposed	Hourly: 3.5 MMscf	Daily: 85 MMScf	Annually: 31,025 MMScf

Section 1-D: Facility Location Information

1	Section: NESE 26	Range: 34E	Township: 20S	County: Lea	Elevation (ft): 3,713
2	UTM Zone: ☐ 12 or ☑ 13			Datum: ☐ NAD 27 ☐ NAD 83 ☑ WGS 84	
a	UTM E (in meters, to nearest 10 meters): 638430			UTM N (in meters, to nearest 10 meters): 3601510	
b	**AND** Latitude (deg., min., sec.): 32° 32' 32.49" N			Longitude (deg., min., sec.): 103° 31' 32.62" W	
3	Name and zip code of nearest New Mexico town: Monument, 88240				
4	Detailed Driving Instructions from nearest NM town (attach a road map if necessary): From the intersection of US-180 W/US-62 and W/W Marland Blvd in Hobbs, NM, head west on US-180 W/US-62 for 22.6 miles. Turn Left (Southerly) onto Co Rd 27A for 6.5 miles. The facility location will be on the right.				
5	The facility is 16.2 (distance) miles SW (direction) of Monument (nearest town).				
6	Status of land at facility (check one): ☑ Private ☐ Indian/Pueblo ☐ Federal BLM ☐ Federal Forest Service ☐ Other (specify)				
7	List all municipalities, Indian tribes, and counties within a ten (10) mile radius (20.2.72.203.B.2 NMAC) of the property on which the facility is proposed to be constructed or operated: Lea County				
8	**20.2.72** NMAC applications **only**: Will the property on which the facility is proposed to be constructed or operated be closer than 50 km (31 miles) to other states, Bernalillo County, or a Class I area (see www.env.nm.gov/aqb/modeling/class1areas.html)? ☑ Yes ☐ No (20.2.72.206.A.7 NMAC) If yes, list all with corresponding distances in kilometers: Texas - 43 km				
9	Name nearest Class I area: Carlsbad Cavern National Park				
10	Shortest distance (in km) from facility boundary to the boundary of the nearest Class I area (to the nearest 10 meters): 90 km				
11	Distance (meters) from the perimeter of the Area of Operations (AO is defined as the plant site inclusive of all disturbed lands, including mining overburden removal areas) to nearest residence, school or occupied structure: 3,748 m				
12	Method(s) used to delineate the Restricted Area: Signs and Fencing "**Restricted Area**" is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area.				
13	Does the owner/operator intend to operate this source as a portable stationary source as defined in 20.2.72.7.X NMAC? ☐ Yes ☑ No A portable stationary source is not a mobile source, such as an automobile, but a source that can be installed permanently at one location or that can be re-installed at various locations, such as a hot mix asphalt plant that is moved to different job sites.				
14	Will this facility operate in conjunction with other air regulated parties on the same property? ☒ No ☐ Yes If yes, what is the name and permit number (if known) of the other facility?				

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

1	Facility **maximum** operating ($\frac{\text{hours}}{\text{day}}$): 24	($\frac{\text{days}}{\text{week}}$): 7	($\frac{\text{weeks}}{\text{year}}$): 52	($\frac{\text{hours}}{\text{year}}$): 8,760		
2	Facility's maximum daily operating schedule (if less than 24 $\frac{\text{hours}}{\text{day}}$)? Start:	☐AM ☐PM	End:	☐AM ☐PM		
3	Month and year of anticipated start of construction: 12/2022					
4	Month and year of anticipated construction completion: Currently operating, modifications pending permit approval					

5	Month and year of anticipated startup of new or modified facility: Currently operating, modifications pending permit approval
6	Will this facility operate at this site for more than one year? ☑ Yes ☐ No

Section 1-F: Other Facility Information

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

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

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

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

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

1	Responsible Official (R.O.) Scott Spicher (20.2.70.300.D.2 NMAC):	Phone: 303.921.9117
a	R.O. Title: EVP and COO	R.O. e-mail: scott@3bearllc.om
b	R. O. Address: 1512 Larimer St #540, Denver, CO 80202	
2	Alternate Responsible Official: Mike Solomon (20.2.70.300.D.2 NMAC):	Phone: 720.202.2824
a	A. R.O. Title: VP Engineering and Operations	A. R.O. e-mail: msolomon@3bearllc.com
b	A. R. O. Address:1512 Larimer St #540, Denver, CO 80202	
3	Company's Corporate or Partnership Relationship to any other Air Quality Permittee (List the names of any companies that have operating (20.2.70 NMAC) permits and with whom the applicant for this permit has a corporate or partnership relationship): 3 Bear Delaware Operating – NM, LLC, 3 Bear Field Services, LLC	
4	Name of Parent Company ("Parent Company" means the primary name of the organization that owns the company to be permitted wholly or in part.): 3 Bear Energy, LLC	
a	Address of Parent Company: 1512 Larimer St. #540, Denver, CO 80202	
5	Names of Subsidiary Companies ("Subsidiary Companies" means organizations, branches, divisions or subsidiaries, which are owned, wholly or in part, by the company to be permitted.): 3 Bear Delaware Operating-NM, LLC, 3 Bear Field Services, LLC, 3Bear Holdings, LLC	

6	Telephone numbers & names of the owners' agents and site contacts familiar with plant operations: Greg Jones - 3 Bear Field Services, LLC – 303.483.3613 Lori Marquez – Barr Engineering – 303.503.4735 Gerald Wyche – 3 Bear Field Services, LLC – 405.205.5288
7	Affected Programs to include Other States, local air pollution control programs (i.e. Bernalillo) and Indian tribes: Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B)? If yes, state which ones and provide the distances in kilometers: Texas: 43 km Bernalillo County: 355 km Indian Tribes and Pueblos: None

Section 1-I – Submittal Requirements

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

Hard Copy Submittal Requirements:

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

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

3) The entire NOI or Permit application package, including the full modeling study, should be submitted electronically. Upon receipt of the application fee, the Bureau will email the applicant with instructions for submitting the electronic files through a secure file transfer service. Optionally, the applicant may submit the files with the application on compact disk (CD) or digital versatile disc (DVD).

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

5) If the applicant submits the electronic files on CD and the application is subject to PSD review under 20.2.74 NMAC (PSD) or NNSR under 20.2.79 NMC include,
   a. one additional CD copy for US EPA,
   b. one additional CD copy for each federal land manager affected (NPS, USFS, FWS, USDI) and,
   c. one additional CD copy for each affected regulatory agency other than the Air Quality Bureau.
   If the application is submitted electronically through the secure file transfer service, these extra CDs do not need to be submitted.

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

1) All required electronic documents shall be submitted. Submit a single PDF document of the entire application as submitted and the individual documents comprising the application.

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

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

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

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Attachment B

Updated UA2 Form

Table 2-A: Regulated Emission Sources

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

Unit Number[1]	Source Description	Make	Model #	Serial #	Manufacturer's Rated Capacity[3] (Specify Units)	Requested Permitted Capacity[3] (Specify Units)	Date of Manufacture[2] / Date of Construction/ Reconstruction[2]	Controlled by Unit # / Emissions vented to Stack #	Source Classification Code (SCC)	For Each Piece of Equipment, Check One	RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB)[4]	Replacing Unit No.
ENG-1	Compressor Engine	Caterpillar	G3516	N6W00415	1380 hp	1380 hp	7/12/2016 After 6/12/2006	Oxidation Catalyst ENG-1	20200254	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	4SLB	ENG-5
ENG-2	Compressor Engine	Caterpillar	G3516	JEF00133	1380 hp	1380 hp	4/17/2009 After 6/12/2006	Oxidation Catalyst ENG-2	20200254	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	4SLB	ENG-6
ENG-3	Compressor Engine	Waukesha	7044 GSI S4	5283703258	1680 hp	1680 hp	11/1/2013 After 6/12/2006	NSCR ENG-3	20200253	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	4SRB	ENG-9
ENG-4	Compressor Engine	Waukesha	7044 GSI S4	368976	1680 hp	1680 hp	1/27/1982 After 6/12/2006	NSCR ENG-4	20200253	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	4SRB	N/A
ENG-5	Compressor Engine	Caterpillar	G3516	TBD	1380 hp	1380 hp	After 7/1/2010 After 6/12/2006	Oxidation Catalyst ENG-5	20200254	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	4SLB	N/A
ENG-6	Compressor Engine	Caterpillar	G3516	TBD	1380 hp	1380 hp	After 7/1/2010 After 6/12/2006	Oxidation Catalyst ENG-6	20200254	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	4SLB	N/A
ENG-5a	Compressor Engine	Waukesha	7044 GSI S4	TBD	1680 hp	1680 hp	After 7/1/2010 After 6/12/2006	NSCR ENG-5a	20200253	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	4SRB	N/A
ENG-6a	Compressor Engine	Waukesha	7044 GSI S4	TBD	1680 hp	1680 hp	After 7/1/2010 After 6/12/2006	NSCR ENG-6a	20200253	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	4SRB	N/A
ENG-5b	Compressor Engine	Waukesha	7044 GSI S5	TBD	1900 hp	1900 hp	After 7/1/2010 After 6/12/2006	NSCR ENG-5b	20200253	☐ Existing (unchanged) ☐ To be Removed ☑ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	4SRB	N/A
ENG-6b	Compressor Engine	Waukesha	7044 GSI S5	TBD	1900 hp	1900 hp	After 7/1/2010 After 6/12/2006	NSCR ENG-6b	20200253	☐ Existing (unchanged) ☐ To be Removed ☑ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	4SRB	N/A
ENG-5c or 6c	Compressor Engine	Caterpillar	3606	TBD	1875 hp	1875 hp	After 7/1/2010 After 6/12/2006	Oxidation Catalyst ENG-5c or 6c	20200253	☐ Existing (unchanged) ☐ To be Removed ☑ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	4SLB	N/A
TK-1	Gunbarrel Tank	Permian Tank & Man. Co.	TBD	4-15790	500 bbl	500 bbl	4/1/2018 1/8/2018	FL-2 TK-1	40400312	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
TK-2	Condensate Tank	TOK Tank Manufacturing	NA	D-804 TK-7100	400 bbl	400 bbl	4/2018 1/8/2018	FL-2 TK-2	31000212	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
TK-3	Condensate Tank	TOK Tank Manufacturing	NA	D-805 TK-7101	400 bbl	400 bbl	4/2018 1/8/2018	FL-2 TK-3	31000212	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
TK-4	Condensate Tank	TOK Tank Manufacturing	NA	D-806 TK-7102	400 bbl	400 bbl	4/2018 1/8/2018	FL-2 TK-4	31000212	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
TK-5	Condensate Tank	TOK Tank Manufacturing	NA	D-807 TK-7103	400 bbl	400 bbl	4/2018 1/8/2018	FL-2 TK-5	31000212	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
TK-6	Condensate Tank	TBD	TBD	TBD	400 bbl	400 bbl	TBD After 9/18/2015	FL-2 TK-6	31000212	☐ Existing (unchanged) ☐ To be Removed ☑ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
TK-7	Condensate Tank	TBD	TBD	TBD	400 bbl	400 bbl	TBD After 9/18/2015	FL-2 TK-7	31000212	☐ Existing (unchanged) ☐ To be Removed ☑ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A

Unit Number[1]	Source Description	Make	Model #	Serial #	Manufacturer's Rated Capacity[3] (Specify Units)	Requested Permitted Capacity[3] (Specify Units)	Date of Manufacture[2] / Date of Construction/ Reconstruction[2]	Controlled by Unit # / Emissions vented to Stack #	Source Classification Code (SCC)	For Each Piece of Equipment, Check One	RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB)[4]	Replacing Unit No.
TK-8	Oil Tank	TOK Tank Manufacturing	TBD	TBD	400 bbl	400 bbl	4/2018 1/8/2018	FL-2 TK-8	40400312	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	TK-6
PWTK-1	Produced Water Tank	TOK Tank Manufacturing	TBD	TBD	400 bbl	400 bbl	4/2018 4/2018	FL-2 PWTK-1	31000213	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
HTR-1	Hot Oil Heater	Tulsa Heaters Midstream	H-101	MJ17-290	49.42 MMBtu/hr	49.42 MMBtu/hr	4/2018 1/8/2018	N/A HTR-1	30600105	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
HTR-2	Regen Gas Heater	Tulsa Heaters Inc.	H-711	13828	11 MMBtu/hr	11 MMBtu/hr	4/2018 1/8/2018	N/A HTR-2	30600105	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
CONDLOAD	Condensate Loadout	N/A	N/A	N/A	N/A	N/A	N/A N/A	N/A N/A	2310021030	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
OILLOAD	Oil Loadout	N/A	N/A	N/A	N/A	N/A	N/A N/A	N/A N/A	2310021030	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
FUG-1	Fugitives - OOOOa	N/A	N/A	N/A	N/A	N/A	N/A After 9/18/2015	N/A N/A	31088811	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
FUG-2	Fugitives - Residue	N/A	N/A	N/A	N/A	N/A	N/A N/A	N/A N/A	31088811	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
AMINE-1	Amine Unit	TBD	TBD	14-039-300	85 MMScf/d	85 MMScf/d	2018 1/8/2018	TO-1 AMINE-1	31000305	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
COMP	Compressor Blowdowns	N/A	N/A	N/A	N/A	N/A	N/A After 9/18/2015	FL-1 ENG 1-6	31000313	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
PLANT BD	Gas Plant Blowdown	N/A	N/A	N/A	N/A	N/A	N/A N/A	FL-1 N/A	31000199	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
TO-1	Thermal Oxidizer	John Zink	ZCS-0.75-5-50-X-6-X-X	VC-9189527	3.3 MMScf/d	3.3 MMScf/d	2/2018 1/8/2018	N/A TO-1	31000199	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
FL-1	Process Flare	Tornado	Guy Wire Air Assist	16263	60 MMSCFD	60 MMSCFD	N/A 1/8/2018	N/A FL-1	31000160	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
FL-2	Tank Flare	Tornado	Self Supp Air Assist	16321	220 MSCFD	220 MSCFD	N/A 1/8/2018	N/A FL-2	31000160	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
HR-1	Road Dust	N/A	N/A	N/A	N/A	N/A	N/A N/A	N/A N/A	31000199	☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☑ To Be Modified ☐ To be Replaced	N/A	N/A
SSM	Maintenance Activities	N/A	N/A	N/A	N/A	N/A	N/A N/A	N/A N/A	31000199	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
UP/MAL-1	Upsets/Malfunctions	N/A	N/A	N/A	N/A	N/A	N/A N/A	N/A N/A	31000199	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced	N/A	N/A
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		
										☐ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced		

[1] Unit numbers must correspond to unit numbers in the previous permit unless a complete cross reference table of all units in both permits is provided.
[2] Specify dates required to determine regulatory applicability.
[3] To properly account for power conversion efficiencies, generator set rated capacity shall be reported as the rated capacity of the engine in horsepower, not the kilowatt capacity of the generator set.
[4] "4SLB" means four stroke lean burn engine, "4SRB" means four stroke rich burn engine, "2SLB" means two stroke lean burn engine, "CI" means compression ignition, and "SI" means spark ignition

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

All 20.2.70 NMAC (Title V) applications must list all Insignificant Activities in this table. All 20.2.72 NMAC applications must list Exempted Equipment in this table. If equipment listed on this table is exempt under 20.2.72.202.B.5, include emissions calculations and emissions totals for 202.B.5 "similar functions" units, operations, and activities in Section 6, Calculations. Equipment and activities exempted under 20.2.72.202 NMAC may not necessarily be Insignificant under 20.2.70 NMAC (and vice versa). Unit & stack numbering must be consistent throughout the application package. Per Exemptions Policy 02-012.00 (see http://www.env.nm.gov/aqb/permit/aqb_pol.html), 20.2.72.202.B NMAC Exemptions do not apply, but 20.2.72.202.A NMAC exemptions do apply to NOI facilities under 20.2.73 NMAC. List 20.2.72.301.D.4 NMAC Auxiliary Equipment for Streamline applications in Table 2-A. The List of Insignificant Activities (for TV) can be found online at https://www.env.nm.gov/wp-content/uploads/sites/2/2017/10/InsignificantListTitleV.pdf. TV sources may elect to enter both TV Insignificant Activities and Part 72

Unit Number	Source Description	Manufacturer	Model No. / Serial No.	Max Capacity / Capacity Units	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5) / Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Manufacture /Reconstruction[2] / Date of Installation /Construction[2]	For Each Piece of Equipment, Check Onc
GEN-1	Generator Engine	TBD	TBD TBD	374 hp	20.2.72.202.B.3 N/A	TBD TBD	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
GEN-2	Generator Engine	TBD	TBD TBD	65 hp	20.2.72.202.B.3 N/A	TBD TBD	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
GEN-3	Generator Engine	TBD	TBD TBD	41 hp	20.2.72.202.B.3 N/A	TBD TBD	☐ Existing (unchanged) ☐ To be Removed ☑ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TK-8220	Amine Sump	N/A	TBD TBD	51 bbl	20.2.72.202.B.5 N/A	TBD TBD	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TK-AMINE	Amine Tank	N/A	TBD TBD	201 bbl	20.2.72.202.B.5 N/A	TBD TBD	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TK-8225	Hot Oil Sump	N/A	TBD TBD	90 bbl	20.2.72.202.B.5 N/A	TBD TBD	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TK-8230	Overhead Compressor	N/A	TBD TBD	51 bbl	20.2.72.202.B.5 N/A	TBD TBD	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
TK-METH	Methanol Tank	N/A	TBD TBD	1,500 gal	20.2.72.202.B.5 N/A	TBD TBD	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
Comp. Oil	Compressor Lube Oil Tanks	N/A	TBD TBD	~250 gal	20.2.72.202.B.5 N/A	TBD TBD	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced
EG Tanks	EG Tanks	N/A	TBD TBD	~55 gal	20.2.72.202.B.5 N/A	TBD TBD	☑ Existing (unchanged) ☐ To be Removed ☐ New/Additional ☐ Replacement Unit ☐ To Be Modified ☐ To be Replaced

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

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

Table 2-C: Emissions Control Equipment

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

Control Equipment Unit No.	Control Equipment Description	Date Installed	Controlled Pollutant(s)	Controlling Emissions for Unit Number(s)[1]	Efficiency (% Control by Weight)	Method used to Estimate Efficiency
ENG-1	Oxidation Catalyst	9/13/2018	VOC, CO and CH2O	ENG-1	54% VOC / 71% CO / 83% CH2O	Catalyst Information
ENG-2	Oxidation Catalyst	9/13/2018	VOC, CO and CH2O	ENG-2	54% VOC / 71% CO / 83% CH2O	Catalyst Information
ENG-3	NSCR	6/5/2020	NOx,VOC, CO and CH2O	ENG-3	96% NOx / 33% VOC / 96% CO / 76% CH2O	Catalyst Information
ENG-4	NSCR	TBD	NOx,VOC, CO and CH2O	ENG-4	96% NOx / 33% VOC / 96% CO / 76% CH2O	Catalyst Information
ENG-5	Oxidation Catalyst	TBD	VOC, CO and CH2O	ENG-5	54% VOC / 71% CO / 83% CH2O	Catalyst Information
ENG-6	Oxidation Catalyst	TBD	VOC, CO and CH2O	ENG-6	54% VOC / 71% CO / 83% CH2O	Catalyst Information
ENG-5a	NSCR	TBD	NOx,VOC, CO and CH2O	ENG-5a	96% NOx / 33% VOC / 96% CO / 76% CH2O	Catalyst Information
ENG-6a	NSCR	TBD	NOx,VOC, CO and CH2O	ENG-6a	96% NOx / 33% VOC / 96% CO / 76% CH2O	Catalyst Information
ENG-5b	NSCR	TBD	NOx,VOC, CO and CH2O	ENG-5b	96% Nox / 16% VOC / 93% CO / 76% CH2O	Catalyst Information
ENG-6b	NSCR	TBD	NOx,VOC, CO and CH2O	ENG-6b	96% Nox / 16% VOC / 93% CO / 76% CH2O	Catalyst Information
ENG-5c or 6c	Oxidation Catalyst	TBD	NOx,VOC, CO and CH2O	ENG-5c or 6c	31% VOC / 73% CO / 68% CH2O	Catalyst Information
TO-1	Thermal Oxidizer	1/8/2018	VOC, H2S	AMINE-1 (acid gas stream)	0.98	Manufacturer Data
FL-1	Plant Flare	1/8/2018	VOC, (H2S during TO downtime)	AMINE-1 (flash gas and backup for acid gas), COMP, PLANT BD, Misc Maintenance	98%	Manufacturer Data
FL-2	Tank Flare	1/8/2018	VOC	TK 1-8, PWTK-1	0.98	Manufacturer Data

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

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

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

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

Unit No.	NOx		CO		VOC		SOx		PM[1]		PM10[1]		PM2.5[1]		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
ENG-1	1.52	6.66	6.27	27.46	2.68	11.75	0.01	0.03	0.11	0.50	0.11	0.50	0.11	0.50	--	--	--	--
ENG-2	1.52	6.66	6.27	27.46	2.68	11.75	0.01	0.03	0.11	0.50	0.11	0.50	0.11	0.50	--	--	--	--
ENG-3	48.94	214.34	43.67	191.30	0.96	4.22	0.01	0.03	0.26	1.13	0.26	1.13	0.26	1.13	--	--	--	--
ENG-4	48.94	214.34	43.67	191.30	0.96	4.22	0.01	0.03	0.26	1.13	0.26	1.13	0.26	1.13	--	--	--	--
ENG-5	1.52	6.66	6.27	27.46	2.68	11.75	0.01	0.03	0.11	0.50	0.11	0.50	0.11	0.50	--	--	--	--
ENG-6	1.52	6.66	6.27	27.46	2.68	11.75	0.01	0.03	0.11	0.50	0.11	0.50	0.11	0.50	--	--	--	--
ENG-5a	48.94	214.34	43.67	191.30	0.96	4.22	0.01	0.03	0.26	1.13	0.26	1.13	0.26	1.13	--	--	--	--
ENG-6a	48.94	214.34	43.67	191.30	0.96	4.22	0.01	0.03	0.26	1.13	0.26	1.13	0.26	1.13	--	--	--	--
ENG-5b	48.01	210.29	37.75	165.33	1.50	6.59	0.01	0.03	0.26	1.14	0.26	1.14	0.26	1.14	--	--	--	--
ENG-6b	48.01	210.29	37.75	165.33	1.50	6.59	0.01	0.03	0.26	1.14	0.26	1.14	0.26	1.14	--	--	--	--
ENG-5c or 6c	2.07	9.05	9.22	40.38	2.38	10.42	0.01	0.03	0.12	0.55	0.12	0.55	0.12	0.55	--	--	--	--
Worst Case Compressor Engine Emissions	**198.78**	**870.67**	**187.24**	**820.09**	**14.07**	**61.62**	**0.04**	**0.20**	**1.27**	**5.55**	**1.27**	**5.55**	**1.27**	**5.55**	**<0.01**	**<0.01**	--	--
TK-1	--	--	--	--	2,477.43	992.12	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
TK-2	--	--	--	--	279.66	10.53	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
TK-3	--	--	--	--	279.66	10.53	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
TK-4	--	--	--	--	279.66	10.53	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
TK-5	--	--	--	--	279.66	10.53	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
TK-6	--	--	--	--	279.66	10.53	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
TK-7	--	--	--	--	279.66	10.53	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
TK-8	--	--	--	--	96.04	1.18	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
PWTK-1	--	--	--	--	0.44	0.01	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
HTR-1	1.63	7.14	2.03	8.87	0.94	4.11	0.03	0.13	0.64	2.81	0.64	2.81	0.64	2.81	--	--	--	--
HTR-2	1.32	5.78	0.44	1.93	0.21	0.92	0.01	0.03	0.14	0.63	0.14	0.63	0.14	0.63	--	--	--	--
CONDLOAD	--	--	--	--	102.36	9.34	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
OILLOAD	--	--	--	--	35.50	0.89	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
FUG-1	--	--	--	--	14.93	65.40	--	--	--	--	--	--	--	--	<0.01	0.02	--	--
FUG-2	--	--	--	--	0.01	0.04	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
AMINE-1	--	--	--	--	28.47	124.70	--	--	--	--	--	--	--	--	31.69	124.91	--	--
COMP	--	--	--	--	937.26	38.35	--	--	--	--	--	--	--	--	0.14	0.01	--	--
PLANT BD	--	--	--	--	5,484.27	8.23	--	--	--	--	--	--	--	--	0.80	<0.01	--	--
TO-1	0.01	0.03	0.01	0.05	<0.01	0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	--	--
FL-1	0.07	0.32	0.15	0.64	<0.01	0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	--	--
FL-2	<0.01	<0.01	<0.01	0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	--	--
HR-1	--	--	--	--	--	--	--	--	5.38	0.16	1.37	0.04	0.14	<0.01	--	--	--	--
SSM	--	--	--	--	--	10.00	--	--	--	--	--	--	--	--	--	<0.01	--	--
UP/MAL-1	--	--	--	--	--	10.00	--	--	--	--	--	--	--	--	--	--	--	--
Totals	201.81	883.95	189.86	831.60	10,869.86	1,390.06	0.08	0.35	7.43	9.15	3.42	9.03	2.19	8.99	32.63	124.94	--	--

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

Table 2-E: Requested Allowable Emissions

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

Unit No.	NOx		CO		VOC		SOx		PM[1]		PM10[1]		PM2.5[1]		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
ENG-1	1.52	6.66	1.83	8.00	1.22	5.35	0.01	0.03	0.11	0.50	0.11	0.50	0.11	0.50	--	--	--	--
ENG-2	1.52	6.66	1.83	8.00	1.22	5.35	0.01	0.03	0.11	0.50	0.11	0.50	0.11	0.50	--	--	--	--
ENG-3	1.85	8.11	1.57	6.89	0.65	2.84	0.01	0.03	0.26	1.13	0.26	1.13	0.26	1.13	--	--	--	--
ENG-4	1.85	8.11	1.57	6.89	0.65	2.84	0.01	0.03	0.26	1.13	0.26	1.13	0.26	1.13	--	--	--	--
ENG-5	1.52	6.66	1.83	8.00	1.22	5.35	0.01	0.03	0.11	0.50	0.11	0.50	0.11	0.50	--	--	--	--
ENG-6	1.52	6.66	1.83	8.00	1.22	5.35	0.01	0.03	0.11	0.50	0.11	0.50	0.11	0.50	--	--	--	--
ENG-5a	1.85	8.11	1.57	6.89	0.65	2.84	0.01	0.03	0.26	1.13	0.26	1.13	0.26	1.13	--	--	--	--
ENG-6a	1.85	8.11	1.57	6.89	0.65	2.84	0.01	0.03	0.26	1.13	0.26	1.13	0.26	1.13	--	--	--	--
ENG-5b	2.09	9.18	2.51	11.01	1.26	5.52	0.01	0.03	0.26	1.14	0.26	1.14	0.26	1.14	--	--	--	--
ENG-6b	2.09	9.18	2.51	11.01	1.26	5.52	0.01	0.03	0.26	1.14	0.26	1.14	0.26	1.14	--	--	--	--
ENG-5c or 6c	2.07	9.05	2.48	10.87	1.63	7.16	0.01	0.03	0.12	0.55	0.12	0.55	0.12	0.55	--	--	--	--
Worst Case Compressor Engine Emissions	**11.18**	**48.97**	**12.77**	**55.92**	**7.25**	**31.74**	**0.04**	**0.20**	**1.27**	**5.55**	**1.27**	**5.55**	**1.27**	**5.55**	**<0.01**	**<0.01**	--	--
TK-1	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-2	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-3	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-4	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-5	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-6	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-7	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-8	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PWTK-1	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
HTR-1	1.63	7.14	2.03	8.87	0.94	4.11	0.03	0.13	0.64	2.81	0.64	2.81	0.64	2.81	--	--	--	--
HTR-2	1.32	5.78	0.44	1.93	0.21	0.92	0.01	0.03	0.14	0.63	0.14	0.63	0.14	0.63	--	--	--	--
CONDLOAD	--	--	--	--	102.36	9.34	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
OILLOAD	--	--	--	--	35.50	0.89	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
FUG-1	--	--	--	--	14.93	65.40	--	--	--	--	--	--	--	--	<0.01	0.02	--	--
FUG-2	--	--	--	--	0.01	0.04	--	--	--	--	--	--	--	--	<0.01	<0.01	--	--
AMINE-1	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
COMP[2]	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PLANT BD[2]	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TO-1	6.52	28.53	11.85	51.86	1.97	8.66	59.60	234.95	0.44	1.93	0.44	1.93	0.44	1.93	0.63	2.50	--	--
FL-1	440.37	48.62	879.47	97.13	440.84	23.30	22.48	1.09	9.99	1.03	9.99	1.03	9.99	1.03	0.20	0.01	--	--
FL-2	18.98	4.97	37.88	9.93	85.04	21.13	0.03	0.01	0.11	0.03	0.11	0.03	0.11	0.03	<0.01	<0.01	--	--
HR-1	--	--	--	--	--	--	--	--	5.38	0.16	1.37	0.04	0.14	<0.01	--	--	--	--
SSM	--	--	--	--	--	10.00	--	--	--	--	--	--	--	--	--	<0.01	--	--
UP/MAL-1	--	--	--	--	--	10.00	--	--	--	--	--	--	--	--	--	--	--	--
Totals	479.99	144.01	944.43	225.65	689.04	185.52	82.18	236.40	17.98	12.14	13.97	12.02	12.73	11.98	0.84	2.53	--	--

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

2 - VOC and H2S emissions for COMP and PLANT BD are represented at FL-1.

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

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

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

Unit No.	NOx		CO		VOC		SOx		PM[2]		PM10[2]		PM2.5[2]		H_2S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
FL-1[3]	440.37	0.22	879.47	0.45	440.84	0.93	22.48	0.02	9.99	0.00	9.99	0.00	9.99	0.00	0.20	0.00	--	--
SSM	--	--	--	--	--	10.00	--	--	--	--	--	--	--	--	--	--	--	--
Totals	440.37	0.22	879.47	0.45	440.84	10.93	22.48	0.02	9.99	0.00	9.99	0.00	9.99	0.00	0.20	0.00	--	--

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

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

3 - VOC and H2S emissions represented at FL-1 are COMP and PLANT BD.

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

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

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

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

Table 2-H: Stack Exit Conditions

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

Stack Number	Serving Unit Number(s) from Table 2-A	Orientation (H-Horizontal V=Vertical)	Rain Caps (Yes or No)	Height Above Ground (ft)	Temp. (F)	Flow Rate		Moisture by Volume (%)	Velocity (ft/sec)	Inside Diameter (ft)
						(acfs)	(dscfs)			
ENG-1	ENG-1	V	No	24	992	152.1	110.2	9	193.7	1.0
ENG-2	ENG-2	V	No	24	992	152.1	110.2	9	193.7	1.0
ENG-3	ENG-3	V	No	24	1,179	137.6	109.2	0.3	128.6	1.2
ENG-4	ENG-4	V	No	24	1,179	137.6	109.2	0	128.6	1.2
ENG-5	ENG-5	V	No	24	992	152.1	110.2	9	193.7	1.0
ENG-6	ENG-6	V	No	24	992	152.1	110.2	9	193.7	1.0
ENG-5a	ENG-5a	V	No	24	1,179	137.6	109.2	0.3	128.6	1.2
ENG-6a	ENG-6a	V	No	24	1,179	137.6	109.2	0	128.6	1.2
ENG-5b	ENG-5b	V	No	24	1,108	141.8	102.7	9	132.6	1.2
ENG-6b	ENG-6b	V	No	24	1,108	141.8	102.7	9	132.6	1.2
ENG-5c or 6c	ENG-5c or 6c	V	No	24	780	201.5	142.5	11.1	201.5	1.3
TK-1	TK-1	V	No	25	70	0.0	0.0	0	0.0	0.7
TK 2-7	TK 2-7	V	No	20	70	0.0	0.0	0	0.0	0.7
TK-8	TK-8	V	No	20	70	0.0	0.0	0	0.0	0.7
PWTK-1	PWTK-1	V	No	20	70	0.0	0.0	0	0.0	0.7
HTR-1	HTR-1	V	No	30	664	89.1	70.9	0	12.6	3.0
HTR-2	HTR-2	V	No	12	500	25.8	20.5	0	8.2	2.0
TO-1	TO-1	V	No	50	1,400	256.9	204.5	0	15.0	4.7
FL-1[1]	FL-1	V	No	100	1,832	129811.3	103319.2	0	65.6	50.2
FL-2[1]	FL-2	V	No	30	1,832	3637.3	2895.0	0	65.6	8.4

[1]Effective diameter and flow rates are calculated per the NMED Modeling Guidelines revised October 26, 2020.

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

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

Stack No.	Unit No.(s)	Total HAPs		Formaldehyde ☑ HAP or ☐ TAP		Acetaldehyde ☑ HAP or ☐ TAP		Acrolein ☑ HAP or ☐ TAP		Benzene ☑ HAP or ☐ TAP		Toluene ☑ HAP or ☐ TAP		Ethylbenzene ☑ HAP or ☐ TAP		Xylenes ☑ HAP or ☐ TAP		n-Hexane ☑ HAP or ☐ TAP		2,2,4 TMP ☑ HAP or ☐ TAP	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
ENG-1	ENG-1	--	--	0.2	0.9	0.1	0.4	0.1	0.3	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.1	--	--
ENG-2	ENG-2	--	--	0.2	0.9	0.1	0.4	0.1	0.3	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.1	--	--
ENG-5	ENG-5	--	--	0.2	0.9	0.1	0.4	0.1	0.3	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.1	--	--
ENG-6	ENG-6	--	--	0.2	0.9	0.1	0.4	0.1	0.3	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.1	--	--
ENG-3	ENG-3	--	--	<0.1	0.2	<0.1	0.2	<0.1	0.2	<0.1	0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	N/A	N/A	--	--
ENG-4	ENG-4	--	--	<0.1	0.2	<0.1	0.2	<0.1	0.2	<0.1	0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	N/A	N/A	--	--
ENG-5a	ENG-5a	--	--	<0.1	0.2	<0.1	0.2	<0.1	0.2	<0.1	0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	N/A	N/A	--	--
ENG-6a	ENG-6a	--	--	<0.1	0.2	<0.1	0.2	<0.1	0.2	<0.1	0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	N/A	N/A	--	--
ENG-5b	ENG-5b	--	--	0.1	0.2	<0.1	0.2	<0.1	0.2	<0.1	0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	N/A	N/A	--	--
ENG-6b	ENG-6b	--	--	0.1	0.2	<0.1	0.2	<0.1	0.2	<0.1	0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	N/A	N/A	--	--
ENG-5c or 6c	ENG-5c or 6c	--	--	0.3	1.3	0.1	0.5	0.1	0.3	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.1	--	--
Worst Case Compressor Engine Emissions	**Worst Case Compressor Engine Emissions**	**2.3**	**9.9**	**1.2**	**5.2**	**0.5**	**2.3**	**0.3**	**1.5**	**0.1**	**0.4**	**<0.1**	**0.2**	**<0.1**	**<0.1**	**<0.1**	**0.1**	**0.1**	**0.3**	**<0.1**	**<0.1**
TK-1	TK-1	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-2	TK-2	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-3	TK-3	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-4	TK-4	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-5	TK-5	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-6	TK-6	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-7	TK-7	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TK-8	TK-8	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PWTK-1	PWTK-1	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
HTR-1	HTR-1	0.1	0.4	<0.1	<0.1	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	0.1	0.4	--	--
HTR-2	HTR-2	<0.1	0.1	<0.1	<0.1	--	--	--	--	<0.1	<0.1	<0.1	<0.1	--	--	--	--	<0.1	0.1	--	--
CONDLOAD	CONDLOAD	2.2	0.2	--	--	--	--	--	--	0.5	<0.1	0.7	0.1	0.1	<0.1	0.2	<0.1	0.5	<0.1	0.1	<0.1
OILLOAD	OILLOAD	3.6	0.1	--	--	--	--	--	--	0.3	<0.1	0.2	<0.1	<0.1	<0.1	0.1	<0.1	2.9	0.1	<0.1	<0.1
FUG-1	FUG-1	0.1	0.3	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	0.1	0.3	<0.1	<0.1
FUG-2	FUG-2	<0.1	<0.1	--	--	--	--	--	--	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
AMINE-1	AMINE-1	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
COMP[2]	COMP	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
PLANT BD[2]	PLANT BD	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
TO-1	TO-1	<0.1	0.1	--	--	--	--	--	--	<0.1	0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
FL-1	FL-1	1.7	0.1	--	--	--	--	--	--	0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	1.6	0.1	<0.1	<0.1
FL-2	FL-2	2.8	0.7	--	--	--	--	--	--	0.7	0.2	0.4	<0.1	<0.1	<0.1	0.1	<0.1	1.5	0.4	<0.1	<0.1
HR-1	HR-1	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
SSM	SSM	--	<0.1	--	--	--	--	--	--	--	<0.1	--	<0.1	--	<0.1	--	<0.1	--	<0.1	--	<0.1
UP/MAL-1	UP/MAL-1	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Totals:		12.6	11.8	1.2	5.2	0.5	2.3	0.3	1.5	1.8	0.8	1.4	0.3	0.1	<0.1	0.4	0.1	6.7	1.7	0.2	<0.1

[1] Gen 1-3 are exempt from permitting, but are shown here to include in facility-wide emissions.

2 -VOC and H2S emissions for COMP and PLANT BD are represented at FL-1.

Table 2-J: Fuel

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

Unit No.	Fuel Type (low sulfur Diesel, ultra low sulfur diesel, Natural Gas, Coal, …)	Fuel Source: purchased commercial, pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other	Specify Units				
			Lower Heating Value	Hourly Usage (scf)	Annual Usage (scf)	% Sulfur	% Ash
ENG-1	Natural Gas	Residue Gas	1000 btu/scf	11,394.00	99,811,440	N/A	N/A
ENG-2	Natural Gas	Residue Gas	1000 btu/scf	11394.00	99,811,440	N/A	N/A
ENG-3	Natural Gas	Residue Gas	1000 btu/scf	13,241.00	115,991,160	N/A	N/A
ENG-4	Natural Gas	Residue Gas	1000 btu/scf	13241.00	115,991,160	N/A	N/A
ENG-5	Natural Gas	Residue Gas	1000 btu/scf	11,394.00	99,811,440	N/A	N/A
ENG-6	Natural Gas	Residue Gas	1000 btu/scf	11394.00	99,811,440	N/A	N/A
ENG-5a	Natural Gas	Residue Gas	1000 btu/scf	13,241.00	115,991,160	N/A	N/A
ENG-6a	Natural Gas	Residue Gas	1000 btu/scf	13241.00	115,991,160	N/A	N/A
ENG-5b	Natural Gas	Residue Gas	1000 btu/scf	13,420.00	117,559,200	N/A	N/A
ENG-6b	Natural Gas	Residue Gas	1000 btu/scf	13420.00	117,559,200	N/A	N/A
ENG-5c or 6c	Natural Gas	Residue Gas	1000 btu/scf	12,467.00	109,210,920	N/A	N/A
HTR-1	Natural Gas	Process Gas	900 btu/scf	54908.00	480,994,080	N/A	N/A
HTR-2	Natural Gas	Process Gas	900 btu/scf	12223.00	107,073,480	N/A	N/A
TO-1	Natural Gas	Process Gas	900 btu/scf	60.00	525,600	N/A	N/A
FL-1	Natural Gas	Residue Gas	1000 btu/scf	500.00	4,380,000	N/A	N/A
FL-2	Natural Gas	Residue Gas	1000 btu/scf	7.00	61,320	N/A	N/A

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

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

Tank No.	SCC Code	Material Name	Composition	Liquid Density (lb/gal)	Vapor Molecular Weight (lb/lb*mol)	Average Storage Conditions		Max Storage Conditions	
						Temperature (°F)	True Vapor Pressure (psia)	Temperature (°F)	True Vapor Pressure (psia)
TK-1	40400312	Oil/ Produced Water	Mixed Hydrocarbons	7.1	50	61.7	5.02	75.77	6.14
TK-2	31000212	Condensate	Mixed Hydrocarbons	5.6	62	61.7	11.85	75.77	14.35
TK-3	31000212	Condensate	Mixed Hydrocarbons	5.6	62	61.7	11.85	75.77	14.35
TK-4	31000212	Condensate	Mixed Hydrocarbons	5.6	62	61.7	11.85	75.77	14.35
TK-5	31000212	Condensate	Mixed Hydrocarbons	5.6	62	61.7	11.85	75.77	14.35
TK-6	31000212	Condensate	Mixed Hydrocarbons	5.6	62	61.7	11.85	75.77	14.35
TK-7	31000212	Condensate	Mixed Hydrocarbons	5.6	62	61.7	11.85	75.77	14.35
TK-8	40400312	Oil	Mixed Hydrocarbons	7.1	50	61.7	5.05	75.77	6.17
PWTK-1	31000213	Produced Water	Water/ Mixed Hydrocarbons	8.34	20	61.7	0.72	75.77	1.03

Table 2-L: Tank Data

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

Tank No.	Date Installed	Materials Stored	Seal Type (refer to Table 2-LR below)	Roof Type (refer to Table 2-LR below)	Capacity		Diameter (M)	Vapor Space (M)	Color (from Table VI-C)		Paint Condition (from Table VI-C)	Annual Throughput (gal/yr)	Turn-overs (per year)
					(bbl)	(M^3)			Roof	Shell			
TK-1	1/8/2018	Oil/ Produced Water	N/A	FX	500	79	3.7	3.81	OT (Green)	OT (Green)	Good	2,520,000	120.00
TK-2	1/8/2018	Condensate	N/A	FX	400	64	3.7	3.05	OT (Green)	OT (Green)	Good	5,110,000	304.17
TK-3	1/8/2018	Condensate	N/A	FX	400	64	3.7	3.05	OT (Green)	OT (Green)	Good	5,110,000	304.17
TK-4	1/8/2018	Condensate	N/A	FX	400	64	3.7	3.05	OT (Green)	OT (Green)	Good	5,110,000	304.17
TK-5	1/8/2018	Condensate	N/A	FX	400	64	3.7	3.05	OT (Green)	OT (Green)	Good	5,110,000	304.17
TK-6	TBD	Condensate	N/A	FX	400	64	3.7	3.05	OT (Green)	OT (Green)	Good	5,110,000	304.17
TK-7	TBD	Condensate	N/A	FX	400	64	3.7	3.05	OT (Green)	OT (Green)	Good	5,110,000	304.17
TK-8	1/8/2018	Oil	N/A	FX	400	64	3.7	3.05	OT (Green)	OT (Green)	Good	420,000	25.00
PWTK-1	1/8/2018	Produced Water	N/A	FX	400	64	3.7	3.05	OT (Green)	OT (Green)	Good	2,100,000	125.00

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

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

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

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

Material Processed				Material Produced			
Description	**Chemical Composition**	**Phase (Gas, Liquid, or Solid)**	**Quantity (specify units)**	**Description**	**Chemical Composition**	**Phase**	**Quantity (specify units)**
Condensate	Mixed Hydrocarbons	Liquid	730000 bbl/yr				
Slop Oil	Mixed Hydrocarbons	Liquid	10000 bbl/yr				
Produced Water	Mixed Hydrocarbons	Liquid	50000 bbl/yr				
Gas	Mixed Hydrocarbons	Gas	85 MMScf/day				

Table 2-N: CEM Equipment

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

Stack No.	Pollutant(s)	Manufacturer	Model No.	Serial No.	Sample Frequency	Averaging Time	Range	Sensitivity	Accuracy
TBD									

Table 2-O: Parametric Emissions Measurement Equipment

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

Unit No.	Parameter/Pollutant Measured	Location of Measurement	Unit of Measure	Acceptable Range	Frequency of Maintenance	Nature of Maintenance	Method of Recording	Averaging Time
N/A								

Table 2-P: Greenhouse Gas Emissions

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

		CO_2 ton/yr	N_2O ton/yr	CH_4 ton/yr	SF_6 ton/yr	PFC/HFC ton/yr[2]									Total GHG Mass Basis ton/yr[4]	Total CO_2e ton/yr[5]
Unit No.	**GWPs [1]**	**1**	**298**	**25**	**22,800**	**footnote 3**										
ENG-1	**mass GHG**	5,837.46	0.01	0.11											5,838	
	CO_2e	5,837.46	3.28	2.75												5843
ENG-2	**mass GHG**	5,837.46	0.01	0.11											5,838	
	CO_2e	5,837.46	3.28	2.75												5843
ENG-3	**mass GHG**	6,783.69	0.01	0.13											6,784	
	CO_2e	6,783.69	3.81	3.20												6791
ENG-4	**mass GHG**	6,783.69	0.01	0.13											6,784	
	CO_2e	6,783.69	3.81	3.20												6791
ENG-5	**mass GHG**	5,837.46	0.01	0.11											5,838	
	CO_2e	5,837.46	3.28	2.75												5843
ENG-6	**mass GHG**	5,837.46	0.01	0.11											5,838	
	CO_2e	5,837.46	3.28	2.75												5843
ENG-5a	**mass GHG**	6,783.69	0.01	0.13											6,784	
	CO_2e	6,783.69	3.81	3.20												6791
ENG-6a	**mass GHG**	6,783.69	0.01	0.13											6,784	
	CO_2e	6,783.69	3.81	3.20												6791
ENG-5b	**mass GHG**	6,875.72	0.01	0.13											6,876	
	CO_2e	6,875.72	3.86	3.24												6883
ENG-6b	**mass GHG**	6,875.72	0.01	0.13											6,876	
	CO_2e	6,875.72	3.86	3.24												6883
ENG-5c or 6c	**mass GHG**	6,387.53	0.01	0.12											6,388	
	CO_2e	6,387.53	3.59	3.01												6394
Worst Case Compressor Engine Emissions	**mass GHG**	39,085.75	0.07	0.74											39087	
	CO2e	39,085.75	21.95	18.42												39126
TK-1	**mass GHG**	1.69	0.00	0.85											3	
	CO2e	1.69	0.00	21.25												23
TK-2	**mass GHG**	0.01	0.00	0.01											0	
	CO2e	0.01	0.00	0.16												0
TK-3	**mass GHG**	0.01	0.00	0.01											0	
	CO2e	0.01	0.00	0.16												0
TK-4	**mass GHG**	0.01	0.00	0.01											0	
	CO2e	0.01	0.00	0.16												0
TK-5	**mass GHG**	0.01	0.00	0.01											0	
	CO2e	0.01	0.00	0.16												0

TK-6	**mass GHG**	0.01	0.00	0.01											0	
	CO2e	0.01	0.00	0.16												0
TK-7	**mass GHG**	0.01	0.00	0.01											0	
	CO2e	0.01	0.00	0.16												0
TK-8	**mass GHG**	0.00	0.00	0.00											0	
	CO2e	0.00	0.00	0.05												0
PWTK-1	**mass GHG**	0.00	0.00	0.00											0	
	CO2e	0.00	0.00	0.05												0
HTR-1	**mass GHG**	25,319.18	0.05	0.48											25320	
	CO2e	25,319.18	14.22	11.93												25345
HTR-2	**mass GHG**	5,635.96	0.01	0.11											5636	
	CO2e	5,635.96	3.17	2.66												5642
CONDLOAD	**mass GHG**	0.08	0.00	1.91											2	
	CO2e	0.08	0.00	47.74												48
OILLOAD	**mass GHG**	0.00	0.00	0.10											0	
	CO2e	0.00	0.00	2.59												3
FUG-1	**mass GHG**	111.45	0.00	930.40											1042	
	CO2e	111.45	0.00	23,259.90												23371
FUG-2	**mass GHG**	0.00	0.00	0.00											0	
	CO2e	0.00	0.00	0.00												0
AMINE-1	**mass GHG**	52,548.92	0.00	0.24											52549	
	CO2e	52,548.92	0.00	5.97												52555
COMP	**mass GHG**	7.93	0.00	2.83											11	
	CO2e	7.93	0.00	70.84												79
PLANT BD	**mass GHG**	1.71	0.00	0.29											2	
	CO2e	1.71	0.00	7.17												9
TO-1	**mass GHG**	30,334.57	0.06	0.57											30335	
	CO2e	30,334.57	17.04	14.29												30366
FL-1	**mass GHG**	49,271.25	0.09	0.93											49272	
	CO2e	49,271.25	27.67	23.21												49322
FL-2	**mass GHG**	4,214.99	0.01	0.08											4215	
	CO2e	4,214.99	2.37	1.99												4219
HR-1	**mass GHG**	0.00	0.00	0.00											0	
	CO2e	0.00	0.00	0.00												0
SSM	**mass GHG**	0.00	0.00	10.00											10	
	CO2e	0.00	0.00	250.00												250
UP/MAL-1	**mass GHG**	0.00	0.00	10.00											10	
	CO2e	0.00	0.00	250.00												250
Total	**mass GHG**	167,447.82	0.22	958.82											168407	
	CO_2e	167,447.82	64.46	23,970.60												230609

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

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

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

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

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

[6] Gen 1-3 are exempt from permitting, but are shown here to include in facility-wide emissions.

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Attachment C

Updated UA3 Form

Section 3

Application Summary

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

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

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

This application and accompanying material is a revision to the initial Title V Operating Permit application for the 3Bear Libby Gas Plant (Libby), owned and operated by 3 Bear Delaware Operating – NM, LLC (3Bear). NSR Permit No. 7482M2 was issued on October 25, 2021 and the initial Title V permit application was submitted September 11, 2019. 3Bear is herein amending the Title V application to reflect modifications to the facility as incorporated in the NSR Permit No. 7482M2. 3Bear increased capacity to receive up to 85 MMscf/day of gas from three surrounding compressor stations owned and operated by 3Bear. Libby separates natural gas liquids (NGL's) from the field gas, producing natural gas liquids and a residue gas for transmission to a pipeline owned by others. The process utilizes a cryogenic gas separation plant and associated compressors for collecting field gas from the gathering system nearby. Gas and NGL's are piped to the respective nearby interconnect metering stations, which are owned by others.

The facility will consist of one of the compressor engine options listed in Table 3-2 in addition to the five engines listed in Table 3-1.

Table 3-1: Compressor Engine Options

Unit Name	Make & Model
ENG 1-2	Caterpillar G3516
ENG 3-4	Waukesha 7044 GSI S4
ENG-5	Waukesha 7044 GSI S5

Table 3-2: Compressor Engine Options

Option No.	Unit Name	Make & Model
1	ENG 6, 6a, 6b, or 6c	Caterpillar G3516, Waukesha 7044 GSI S4, or Waukesha 7044 GSI S5, or Caterpillar 3606

Notes:
The worst-case emissions are included in the total facility emissions.

In addition to the compressor engine options, the facility consists of the following emission units: three generator engines, one gunbarrel tank, six condensate tanks, one slop oil tank, one produced water tank, one hot oil heater, one regen gas heater, one amine unit, one condensate loadout, one oil loadout, one thermal oxidizer, one plant flare, one tank flare, process piping

fugitives, haul road fugitives, and miscellaneous insignificant tanks. The generators are exempt pieces of equipment under 20.2.72.202.B.3 and the miscellaneous insignificant tanks are exempt under 20.2.72.202.B.5.

SSM Overview:

SSM emissions are included in the total facility wide emissions. The compressor blowdowns and plant blowdowns are controlled by the plant flare. Additional maintenance flaring are included to account for other maintenance activities. Maintenance activities that cannot be controlled are included at a rate of 10 tpy has been used for these uncontrolled maintenance activities. In the event that the thermal oxidizer is down, the plant flare (FL-1) is used as a backup control device for the amine acid gas waste stream.

Section 4

Process Flow Sheet

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

The facility process flow sheet is provided on the next page.

Section 5

Plot Plan Drawn To Scale

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

The facility plot plan is provided on the next page.

Section 6

All Calculations

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

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

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

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

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

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

Significant Figures:

A. All emissions standards are deemed to have at least two significant figures, but not more than three significant figures.

B. At least 5 significant figures shall be retained in all intermediate calculations.

C. In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:

(1) If the first digit to be discarded is less than the number 5, the last digit retained shall not be changed;

(2) If the first digit discarded is greater than the number 5, or if it is the number 5 followed by at least one digit other than the number zero, the last figure retained shall be increased by one unit; **and**

(3) If the first digit discarded is exactly the number 5, followed only by zeros, the last digit retained shall be rounded upward if it is an odd number, but no adjustment shall be made if it is an even number.

(4) The final result of the calculation shall be expressed in the units of the standard.

Control Devices: In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device

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

The emissions calculations are provided on the following pages.

Section 6.a

Green House Gas Emissions

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

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

Calculating GHG Emissions:

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

Sources for Calculating GHG Emissions:

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

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

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

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

Section 7

Information Used To Determine Emissions

Information Used to Determine Emissions shall include the following:

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

Gunbarrel Tank

The gunbarrel tank (TK-1) is controlled by a flare (FL-2) with 98% control efficiency. The working and breathing emissions for the gunbarrel tank are calculated using BTECS.* By using the vapor density and emissions provided by BTECS and the liquid volume going to each tank (TK 1-8, PWTK-1), the amount of waste gas contributed from working and breathing by each tank was calculated. The gunbarrel flash gas volume is calculated by subtracting the working and breathing volume from each tank from the total tank flare throughput. A mass balance was performed on the flash volume to calculate flash emissions at the gunbarrel tank.

*BTECS = Barr Tank Emission Calculation Spreadsheet v.1.3.2 is a tool developed by Barr Engineering to calculate working and breathing losses using AP-42 Chapter 7.1 (June 2020) methodology.

Produced Water Storage Tank

The produced water tank (PWTK-1) is controlled by a flare (FL-2). The working and breathing emissions for the produced water tanks are calculated using BTECS. Emissions were calculated based on the assumption that 5% of the produced water throughput is oil.

Condensate Storage Tanks

The condensate tanks (TK 2-7) are controlled by a flare (FL-2). The working and breathing emissions for the condensate tanks were calculated using BTECS.

Hot Oil & Regenerator Gas Heaters

The emissions from separator heaters (HTR-1, HTR-2) are calculated based on manufacturer data and EPA approved AP-42 emission factors from Chapter 1.4, Tables 1.4-2 through 1.4-3.

Equipment Fugitives

FUG-1 emissions are estimated using component emission rates from EPA's Oil and Gas Production Operations average equipment leak emission factors (EPA 453/R-95-017 dated November 1995) Table 2-4. Component counts include actual component counts for existing equipment and estimated counts for equipment not yet installed.

FUG-2 emissions (non OOOOa) are estimated using component emission rates from EPA's Oil and Gas Production Operations average equipment leak emission factors (EPA 453/R-95-017 dated November 1995) Table 2-4. Residue component counts were estimated by using an engineering assumption.

Loadout

Emissions from truck loading of the condensate and oil (CONDLOAD & OILLOAD) are vented to atmosphere. Working loss emissions were estimated using the US EPA loadout equation from AP-42 Section 5.2, and the annual volume of oil/condensate. Most of the condensate will be piped off site, calculations allow for trucking during pipeline downtime or other event-based trucking requirements. All the oil will be trucked off site.

Flares

The emissions for the plant flare (FL-1) are based on the flare pilot and combustion of plant waste streams and maintenance activities. Additionally, this flare serves as backup control for the acid gas waste stream when the thermal oxidizer (TO-1) is down. Emission factors from the manufacturer were utilized for NOx and CO. The VOC, H2S, and HAP emissions were calculated using a mass balance. The VOC & H2S emissions are represented at the amine unit (AMINE-1)

The emissions for the tank flare (FL-2) are based on the flare pilot and waste streams from the tanks. Emission factors from the manufacturer were utilized for NOx and CO. The VOC and H2S emission factors were calculated using a mass balance. The VOC, H2S, and HAP emissions were calculated using a mass balance. Due to the variability of heat content in tank waste streams a conservative heating value was used.

Thermal Oxidizer

The emissions for the thermal oxidizer (TO-1) are based on the thermal oxidizer pilot, assist gas stream, and the acid gas waste stream from the amine unit (AMINE-1). Emission factors from AP-42 Table 1.4-1 and AP-42 Table 1.4-2 were utilized for NOx and CO. SO2 emission factors were calculated using a mass balance found on the H2S to SO2 conversion tab. The VOC & H2S emissions are represented at the amine unit (AMINE-1).

Amine Unit

The emissions for the amine unit (AMINE-1) are based on the Promax run.

Compressor Blowdowns

The emissions for compressor blowdowns (COMP) are calculated using a mass balance and an estimated 4 Mscf/event. Compressor blowdowns are controlled by FL-1.

Plant Blowdowns

The emissions for the plant blowdowns (PLANT BD) are calculated using a mass balance and an estimated 300 Mscf/event. Plant blowdowns are controlled by FL-1.

Compressor Engines

The compressor engine emissions (ENG 1-6) are calculated based on manufacturer specifications, including horsepower, fuel consumption, and uncontrolled emission factors, as well as any applicable emission standards. For pollutants without manufacturer or regulatory defined emission factors, emissions were calculated based on EPA approved AP-42 emission factors from Chapter 3.2, Tables 3.2-1, 3.2-2 and 3.2-3. Lean burn engines are equipped with oxidation catalysts and rich burn engines are equipped with nonselective catalytic reduction for emission control.

SSM

No change to previous representations. The facility represents SSM emissions as 10 tpy of VOC's.

Malfunction Emissions

No change to previous representations. The facility represents malfunction emissions (UP/MAL-1) emissions as 10 tpy of VOC's.

Generator Engines

The generator engine emissions (GEN-1) are calculated based on manufacturer specifications, including horsepower, fuel consumption, and uncontrolled emission factors, as well as any applicable emission standards. For pollutants without manufacturer or regulatory defined emission factors, emissions were calculated based on EPA approved AP-42 emission factors from Chapter 3.2, Tables 3.2-1, 3.2-2 and 3.2-3.

The generator engines emissions (GEN 2-3) are calculated based on manufacturer specifications, including horsepower, fuel consumption, and uncontrolled emission factors, as well as any applicable emission standards. For pollutants without manufacturer or regulatory defined emission factors, emissions were calculated based on EPA approved AP-42 emission factors from Chapter 3.3, Tables 3.3-2, and 40 CFR 89.112.

Section 8

Map(s)

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

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

A map is provided on the following page.

Section 9

Proof of Public Notice

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

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

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

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

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

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

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

Public notice is not required for applications submitted under 20.2.70.

Section 10

Written Description of the Routine Operations of the Facility

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

The 3Bear Libby Gas Plant is equipped to gather natural gas from three surrounding compressor stations: 3Bear Aztec Compressor Station, 3Bear Outland Compressor Station, and 3Bear Lariat Compressor Station, which are owned and operated by 3Bear. The gas from the compressor stations is sent to the gas processing plant for treatment.

Libby separates natural gas liquids (NGL's) from the field gas, producing natural gas liquids and a residue gas for transmission to a pipeline owned by others. The process utilizes a cryogenic gas separation plant and associated compressors for collecting field gas from the gathering system nearby. Gas and NGL's are piped to the respective nearby interconnect metering stations, which are owned by others.

The facility does not currently compress inlet gas, but future compressors may compress inlet gas and send the gas to the processing plant where an amine unit (AMINE-1) on site treats and sweeten the gas. The acid gas from the amine unit is controlled by a thermal oxidizer (TO-1) and the flash gas is used as fuel gas or controlled by the plant flare (FL-1). In the event that the thermal oxidizer is down, the acid gas is sent to the plant flare (FL-1). The NGLs produced are pumped offsite via pipeline . Liquids from process drains are sent to a gunbarrel tank (TK-1) for hydrocarbon separation. Oil from the Gunbarrel separation is stored in one 400-bbl slop oil tank (TK-8) and produced water is stored in produced water tank (PWTK-1). Condensate tanks store stabilized condensate (TK-2 through TK-7). A tank flare (FL-2) controls all condensate, gunbarrel, oil, and water tanks on site, and oil and water are trucked off site (CONDLOAD and OILLOAD). Condensate is piped offsite to Oil Terminal. A plant flare (FL-1) controls amine flash gas (intermittently), compressor blowdowns (COMP), plant blowdowns (PLANT BD), process gas, residue gas, other maintenance and emergency upset conditions. Fugitive emissions occur from process piping and other components (FUG 1-2). Road dust emissions occur from daily routine traffic to the gas plant (HR-1). Additional equipment on site will include: three generator engines (GEN 1-3), one 49.42 MMBtu/hr hot oil heater (HTR-1), one 11.0 MMBtu/hr regen gas heater (HTR-2), and miscellaneous insignificant tanks. The generators are exempt pieces of equipment under 20.2.72.202.B.3 and the miscellaneous insignificant tanks are exempt under 20.2.72.202.B.5.

Section 11
Source Determination

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

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

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

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

3Bear evaluated the Libby Gas Plant with respect to two nearby facilities that will also be owned and operated by 3Bear:

- The Libby plant site is located south of a crude oil terminal, associated pipeline pumps, and containment area. The crude storage system pumps oil to a nearby oil pipeline.
- The plant site is also located south of a central liquid waste treatment and storage system that includes tank battery and containment with oil-water separators, filtration, and treatment equipment for receiving drill pad waste liquids for processing.

As defined by 40 CFR Part 70.2, "*Major source* means any stationary source (or any group of stationary sources that are located on one or more continuous or adjacent properties, and are under common control of the same person (or persons under common control)) belonging to a single major industrial grouping and that are described in paragraph (1), (2), or (3) of this definition. For the purposes of defining "major source," a stationary source or group of stationary sources shall be considered part of a single industrial grouping if all of the pollutant emitting activities at such source or group of sources on contiguous or adjacent properties belong to the same Major Group (*i.e.,* all have the same two-digit code) as described in the Standard Industrial Classification Manual, 1987. State programs may adopt the following provision: For onshore activities belonging to Standard Industrial Classification (SIC) Major Group 13: Oil and Gas Extraction, pollutant emitting activities shall be considered adjacent if they are located on the same surface site; or if they are located on surface sites that are located within 1⁄4 mile of one another (measured from the center of the equipment on the surface site) and they share equipment. Shared equipment includes, but is not limited to, produced fluids storage tanks, phase separators, natural gas dehydrators or emissions control devices. Surface site, as used in the introductory text of this definition, has the same meaning as in 40 CFR 63.761."

Per 40 CFR 63.761, *Surface site* means any combination of one or more graded pad sites, gravel pad sites, foundations, platforms, or the immediate physical location upon which equipment is physically affixed.

The crude oil terminal and liquid waste treatment and storage system are on the same property owned by 3Bear but are not associated with plant operations and do not share equipment. The facilities will each have their own separate fence-lines and entrances. The Libby plant site is separated from the liquid waste treatment site by a pipeline laydown yard and the crude oil terminal as well as the separate fence-lines and entrances.

The oil terminal operates under SIC 5171, whereas, the Libby plant and the liquid waste treatment and storage system both operate under 2-digit SIC 13.

Based on this analysis, the three facilities are not on the same surface site and do not share equipment, therefore, they are not adjacent as defined by the regulation. Air authorization/permit applications for both nearby facilities will be submitted under separate cover.

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

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

☑ **Yes** ☐ **No**

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

☑ **Yes** ☐ **No**

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

☐ **Yes** ☑ **No**

C. Make a determination:

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

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

Section 12

Section 12.A
PSD Applicability Determination for All Sources

(Submitting under 20.2.72, 20.2.74 NMAC)

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

A. This facility is:

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

B. **This facility is not one of the listed 20.2.74.501 Table I – PSD Source Categories. The "project" emissions** for this modification are **not significant. The "project" emissions listed below do not only result from changes described in this permit application, thus no emissions from other revisions or modifications, past or future to this facility. Also, specifically discuss whether this project results in "de-bottlenecking", or other associated emissions resulting in higher emissions. The project emissions (before netting) for this project are as follows [see Table 2 in 20.2.74.502 NMAC for a complete list of significance levels]:**

a. **NOx: 144.0 TPY**
b. **CO: 225.7 TPY**
c. **VOC: 185.5 TPY**
d. **SOx: 236.4 TPY**
e. **PM10: 12.0 TPY**
f. **PM2.5: 12.0 TPY**
g. **Fluorides: N/A TPY**
h. **Lead: N/A TPY**
i. **Sulfur compounds (listed in Table 2): N/A TPY**
j. **GHG: 230,609 TPY**

Note: Emissions shown do not include emissions from exempt or insignificant equipment.

C. **Netting is not required (project is not significant)**
D. **BACT** is **not required for this modification, as this application is a minor modification.**

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

Section 13

Determination of State & Federal Air Quality Regulations

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

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

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

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

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

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

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

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

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

Example of a Table for STATE REGULATIONS:

STATE REGU-LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.1 NMAC	General Provisions	Yes	Facility	General Provisions apply to Notice of Intent, Construction, and Title V permit applications.
20.2.3 NMAC	Ambient Air Quality Standards NMAAQS	Yes	Facility	This facility is located in New Mexico, therefore the requirements of this part are applicable.
20.2.7 NMAC	Excess Emissions	Yes	Facility	This facility is subject to Air Quality Control Regulations, as defined in 20.2.7 NMAC, and is thus subject to the requirements of this regulation.
20.2.23 NMAC	Fugitive Dust Control	No	Facility	This is a permitted facility therefore this regulation does not apply.
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No		This facility DOES NOT have new gas burning equipment **(external combustion emission sources, such as gas fired boilers and heaters)** having a heat input of greater than 1,000,000 million British Thermal Units per year per unit This facility DOES NOT have existing gas burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit Note: "New gas burning equipment" means gas burning equipment, the construction or modification of which is commenced after February 17, 1972.
20.2.34 NMAC	Oil Burning Equipment: NO_2	No		This facility DOES NOT have oil burning equipment **(external combustion emission sources, such as oil fired boilers and heaters)** having a heat input of greater than 1,000,000 million British Thermal Units per year per unit.
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	Yes	Facility	This facility is a natural gas processing plant; therefore it is subject to the requirements of NMAC 2.35 for "New Natural **Gas Processing** Plants" as defined by the rule.
20.2.37 and 20.2.36 NMAC	Petroleum Processing Facilities and Petroleum Refineries	N/A	N/A	**These regulations were repealed by the Environmental Improvement Board. If you had equipment subject to 20.2.37 NMAC before the repeal, your combustion emission sources are now subject to 20.2.61 NMAC.**
20.2.38 NMAC	Hydrocarbon Storage Facility	Yes	TK 2-8	This regulation could apply to storage tanks at petroleum production facilities, processing facilities, tanks batteries, or hydrocarbon storage facilities.
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No		This facility is NOT a sulfur recovery plant
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	ENG-1, 2, 3, 4, 5, 6, 5a, 6a, 5b, 6b, and 5c or 6c, HTR 1-2, TO-1, FL 1-2	Engines, heaters, thermal oxidizers and flares are Stationary Combustion Equipment. Generators are back up units exempt under 20.2.72.202.B.3.
20.2.70 NMAC	Operating Permits	Yes	Facility	As proposed, this facility is a Title V Major source and is in turn subject to 20.2.70.
20.2.71 NMAC	Operating Permit Fees	Yes	Facility	This facility is subject to 20.2.70 NMAC and is in turn subject to 20.2.71 NMAC.
20.2.72 NMAC	Construction Permits	Yes	Facility	This facility is subject to 20.2.72 NMAC.

STATE REGU-LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.73 NMAC	NOI & Emissions Inventory Requirements	Yes	Facility	**Emissions Inventory Reporting:** 20.2.73.300 NMAC applies. This facility will be issued a permit under 20.2.72 NMAC, therefore it will meet the applicability requirements of 20.2.73.300 NMAC.
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	No	Facility	This facility is NOT a PSD major source,
20.2.75 NMAC	Construction Permit Fees	Yes	Facility	Subject to 20.2.72 NMAC and is in turn subject to 20.2.75 NMAC.
20.2.77 NMAC	New Source Performance	Yes	ENG-1, 2, 3, 4, 5, 6, 5a, 6a, 5b, 6b, and 5c or 6c, FUG-1, COMP, AMINE -1, GEN 1-3	HTR 1-2 are subject to NSPS Dc ENG-1, 2, 3, 4, 5, 6, 5a, 6a, 5b, 6b, and 5c or 6c, GEN-1 are subject to NSPS Subpart JJJJ. FUG-1, COMP, AMINE-1 are subject to NSPS Subpart OOOOa. GEN 2-3 is subject to NSPS Subpart IIII.,
20.2.78 NMAC	Emission Standards for HAPS	No		This facility DOES NOT emit hazardous air pollutants that are subject to the requirements of 40 CFR Part 61, as amended through January 31, 2009.
20.2.79 NMAC	Permits – Nonattainment Areas	No		This facility is located in an attainment area for all regulated pollutants. PTE is major for NOx, CO, and SO2. The significance levels for NOx, CO, and SO2 will meet the national ambient air quality standard, therefore this regulation is not applicable to those pollutants.
20.2.80 NMAC	Stack Heights	Yes		3Bear considered GEP requirements in the previously submitted analysis. Stack heights do not exceed GEP.
20.2.82 NMAC	MACT Standards for source categories of HAPS	Yes	ENG-1, 2, 3, 4, 5, 6, 5a, 6a, 5b, 6b, and 5c or 6c, GEN 1-3	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63. Applies if other MACT subpart applies. The MACT subpart ZZZZ applies as discussed below.

Example of a Table for Applicable FEDERAL REGULATIONS (Note: This is not an exhaustive list):

FEDERAL REGU-LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
40 CFR 50	NAAQS	Yes	Facility	Applies since the source emits air pollutants subject to NAAQS. Defined as applicable at 20.2.70.7.E.22, any national ambient air quality standard. See Section 16 for modeled demonstration of NAAQS compliance.
NSPS 40 CFR 60, Subpart A	General Provisions	Yes	ENG-1, 2, 3, 4, 5, 6, 5a, 6a, 5b, 6b, and 5c or 6c, FUG-1, COMP, AMINE-1, GEN 1-3	HTR 1-2 are subject to NSPS Dc ENG-1, 2, 3, 4, 5, 6, 5a, 6a, 5b, 6b, and 5c or 6c, GEN-1 are subject to NSPS Subpart JJJJ. FUG-1, COMP, AMINE-1 are subject to NSPS Subpart OOOOa. GEN 2-3 is subject to NSPS Subpart IIII.
NSPS 40 CFR60.40a, Subpart Da	Subpart Da, Performance Standards for **Electric Utility Steam Generating Units**	No		There is not a steam generating unit that commenced construction, modification, or reconstruction after September 18, 1978, and that is capable of combusting more than 73 megawatts (MW) (250 million British thermal units per hour (MMBtu/hr)), therefore this facility is not applicable to this regulation.
NSPS 40 CFR60.40b Subpart Db	**Electric Utility Steam Generating Units**	No		There is not a steam generating unit that commenced construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)), therefore this facility is not applicable to this regulation.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Yes	HTR 1-2	This facility has steam generating units for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h). This regulation, therefore, applies to the specified heaters.
NSPS 40 CFR 60, Subpart Ka	Standards of Performance for **Storage Vessels for Petroleum Liquids** for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and **Prior** to July 23, 1984	No		This facility does not have storage vessels greater than 151,416 liters (40,000 gallons) that are used to store petroleum liquids for which construction is commenced after May 18, 1978, therefore the facility is not applicable to this regulation.
NSPS 40 CFR 60, Subpart Kb	Standards of Performance for **Volatile Organic Liquid Storage Vessels** (Including	No		Gunbarrel TK-1 is a vessel with capacity greater than or equal to 75 cubic meters (m^3) but less than 1,589,874 m^3 but does not meet the definition of storage vessel, therefore is not applicable to this subpart. TK 2-8, PWTK-1, and insignificant tanks are NOT storage vessels with capacities

FEDERAL REGU-LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
	Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced **After** July 23, 1984			greater than or equal to 75 cubic meters (m^3) but less than 1,589,874 m^3 that are used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification commenced after July 23, 1984.
NSPS 40 CFR 60.330 Subpart GG	**Stationary Gas Turbines**	No		There are no stationary gas turbines exceeding 10 MMBtu/hr at this facility.
NSPS 40 CFR 60, Subpart KKK	Leaks of VOC from **Onshore Gas Plants**	No		This facility is an onshore natural gas processing plant that will commence construction, reconstruction, or modification AFTER August 23, 2011, therefore the facility is not applicable to this subpart.
NSPS 40 CFR Part 60 Subpart LLL	Standards of Performance for **Onshore Natural Gas Processing**: SO_2 Emissions	No		This facility is an onshore natural gas processing plant that will commence construction, reconstruction, or modification AFTER August 23, 2011, therefore the facility is not applicable to this subpart.
NSPS 40 CFR Part 60 Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015	No		The facility is NOT subject to the provisions of NSPS Subpart OOOO because the facility will be constructed after September 18, 2015.
NSPS 40 CFR Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015	Yes	FUG-1, COMP, AMINE-1	The facility IS subject to the provisions of NSPS Subpart OOOOa listed below because: - The compressors (COMP) are not co-located with a wellhead, so the reciprocating compressor requirements are applicable (§60.5365a (c)). - AMINE-1 is a sweetening unit located at onshore natural gas processing plants that process natural gas produced from onshore wells (§60.5365a (g)). - This is an onshore natural gas processing plant therefore the equipment leak standards apply to the affected facilities (FUG-1) (§60.5365a (f)). The facility is NOT subject to the provisions of NSPS Subpart OOOOa listed below because: - There are no gas-fired, continuous high bleed pneumatic controllers at this site, so the pneumatic controller requirements are not applicable (§60.5365a (d)). - TK-1 is a process vessel not a storage vessel, therefore the storage vessel affected facility requirements are not applicable. - TK 2-8, PWTK-1, insignificant tanks are storage vessels that emit less than 6 tpy VOC, therefore the storage vessel affected facility requirements are not applicable (§60.5365a (e)(3)(v)).
NSPS 40 CFR 60	Standards of performance for	Yes	GEN 2-3	GEN 2-3 are subject to NSPS Subpart IIII because the engine has a manufacture date after July 11, 2005 (§60.4200(a) (2)).

FEDERAL REGU-LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
Subpart IIII	Stationary Compression Ignition Internal Combustion Engines			
NSPS 40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Yes	ENG-1, 2, 3, 4, 5, 6, 5a, 6a, 5b, 6b, and 5c or 6c, GEN-1	ENG-1, 2, 3, 4, 5, 6, 5a, 6a, 5b, 6b, and 5c or 6c are subject to NSPS Subpart JJJJ because the engines have a manufacture date after July 1, 2007 and have a maximum engine power greater than 500 hp (§60.4230(a) (4)(i)). GEN-1 is subject to NSPS Subpart JJJJ because the generator has a manufacture date after July 1, 2008 and has a maximum engine power less than 500 hp (§60.4230(a) (4)(iii)).
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	No		There are not any steam generating units, integrated gasification combined cycle (IGCC), or stationary combustion turbines on site, therefore this facility is not subject to this subpart.
NSPS 40 CFR 60 Subpart UUUU	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units	No		There are not any steam generating units, integrated gasification combined cycle (IGCC), or stationary combustion turbines on site, therefore this facility is not subject to this subpart.
NSPS 40 CFR 60, Subparts WWW, XXX, Cc, and Cf	Standards of performance for Municipal Solid Waste (MSW) Landfills	No		This facility is not a landfill; therefore, it is not applicable to this subpart.
NESHAP 40 CFR 61 Subpart A	General Provisions	No		This facility DOES NOT emit HAP's in quantities that trigger these requirements.
NESHAP 40 CFR 61 Subpart E	National Emission Standards for **Mercury**	No		This facility DOES NOT process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge.
NESHAP 40 CFR 61 Subpart V	National Emission Standards for **Equipment Leaks** (Fugitive Emission Sources)	No		The provisions of this subpart apply to each of the following sources that are intended to operate in volatile hazardous air pollutant (VHAP) service: pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, valves, connectors, surge control vessels, bottoms receivers, and control devices or systems required by this subpart. VHAP service means a piece of equipment either contains or contacts a fluid (liquid or gas) that is at least 10 percent by weight of VHAP. VHAP means a substance regulated under this subpart for which a standard for equipment leaks of the substance has been promulgated. Benzene is a VHAP (See 40 CFR 61 Subpart J). Link to 40 CFR 61 Subpart V Note: If 40 CFR 60 also applies source only needs to comply with this part. No equipment at this facility contains or contacts a fluid with at least 10 percent by weight of a VHAP.
MACT 40 CFR 63, Subpart A	General Provisions	Yes	ENG-1, 2, 3, 4, 5, 6, 5a, 6a, 5b, 6b, and 5c or 6c, GEN 1-3	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63. Applies if other MACT subpart applies. The MACT Subpart ZZZZ applies as discussed below. The facility is classified as an area source of HAPs.

FEDERAL REGU-LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
MACT 40 CFR 63.760 Subpart HH	**Oil and Natural Gas Production Facilities**	No		There are no dehydrators located at this facility. This facility is not a major source of HAPs.
MACT 40 CFR 63 Subpart HHH		No		This facility IS NOT a natural gas transmission and storage facility or a major source of HAPs.
MACT 40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and Institutional Boilers & Process Heaters	No		This facility is not a major source of HAPs, therefore it is not subject to this subpart.
MACT 40 CFR 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric Utility Steam Generating Unit	No		There are not any coal and oil fired electric utility steam generating units on site, therefore it is not subject to this subpart.
MACT 40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (**RICE MACT**)	Yes	ENG-1, 2, 3, 4, 5, 6, 5a, 6a, 5b, 6b, and 5c or 6c, GEN 1-3	40 CFR 63, Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from existing, new, modified and reconstructed stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. The regulation contains provisions for initial and continuous compliance demonstration. The facility is an **area** source of HAP, as defined under the regulation. Under §63.6590(a)(2)(iii) and (a)(3)(iii), a RICE located at an area source of HAP is a *new* or *reconstructed* unit if it is constructed or reconstructed on or after June 12, 2006. Under §63.6590(c)(1), a *new* or *reconstructed* SI RICE at an area source of HAP must meet the requirements of the part by meeting the requirements of 40 CFR 60, Subpart JJJJ (NSPS for Stationary Spark Ignition Internal Combustion Engines). ENG 1-6, and GEN-1 are subject to NSPS Subpart JJJJ. Under §63.6590(a)(2)(iii) and (a)(3)(iii), a RICE located at an area source of HAP is a *new* or *reconstructed* unit if it is constructed or reconstructed on or after June 12, 2006. Under §63.6590(c)(1), a *new* or *reconstructed* SI RICE at an area source of HAP must meet the requirements of the part by meeting the requirements of 40 CFR 60, Subpart IIII (NSPS for Stationary Compression Ignition Internal Combustion Engines). GEN 2-3 are subject to NSPS Subpart IIII.

FEDERAL REGU-LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
40 CFR 64	**Compliance Assurance Monitoring**	Yes	AMINE-1, TK-1	The amine sweetening unit has pre-control VOC and H2S emissions greater than 100 TPY and does not have an applicable emission limitation or standard under NSPS or NESHAPs. The amine unit is subject to OOOOa 60.5365a and recordkeeping of 60.5423a(c) but only has to demonstrate <2LTD H2S in the acid gas stream. However, this unit cannot claim exemption under 64.2(b)(1)(i) since there is not an applicable post 1990 standard for VOC for this unit. Therefore, 3Bear believes this facility IS subject to 40 CFR 64. The Waukesha 7044 S4 and 7044 S5 compressor engine options have pre-control NOx and CO emissions greater than 100 TPY and uses a control device to achieve compliance with an emission limitation or standard. The engines are affected facilities under NSPS JJJJ, therefore, are exempt under §64.2(b)(1)(i) Therefore, 3Bear believes this facility IS NOT subject to 40 CFR 64. The gunbarrel tank has pre-control VOC emissions greater than 100 TPY and does not have an applicable emission limitation or standard under NSPS or NESHAPs. The gunbarrel tank is a process vessel, not a storage vessel and does not meet the requirements of 40 CFR 60 Subpart Kb or 40 CFR 60 Subpart OOOOa. Therefore, 3Bear believes this facility IS subject to 40 CFR 64.
40 CFR 68	**Chemical Accident Prevention**	Yes		This facility will handle naturally occurring hydrocarbon mixtures at a natural gas processing plant and the Accidental Release Prevention Provisions are applicable to this facility. The facility was required to submit the appropriate accidental release emergency response program plan prior to operation of the facility with more than the threshold quantity of a regulated substance. The RMP can be found under EPA Facility Identifier 100000239333.
Title IV – Acid Rain 40 CFR 72	**Acid Rain**	No		Not an affected facility.
Title IV – Acid Rain 40 CFR 73	**Sulfur Dioxide** Allowance Emissions	No		Not an affected facility.
Title IV-Acid Rain 40 CFR 75	**Continuous Emissions Monitoring**	No		Not an affected facility.
Title IV – Acid Rain 40 CFR 76	**Acid Rain** Nitrogen Oxides **Emission Reduction Program**	No		Not an affected facility.
Title VI – 40 CFR 82	Protection of **Stratospheric Ozone**	N/A	N/A	Not Applicable – facility will not “service” , “maintain”, or “repair” class I or class II appliances nor “disposes” of the appliances.

Section 14

Operational Plan to Mitigate Emissions

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

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

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

Section 15

Alternative Operating Scenarios

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

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

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

Please see Table 3-1 and Table 3-2.

Section 16

Air Dispersion Modeling

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

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

Check each box that applies:

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

Section 17

Compliance Test History

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

Compliance Test History Table

Unit No.	Test Description	Test Date
ENG-1 (N6W00415)	Tested in accordance with EPA test methods as required by NSR permit 7482.	4/16/2019
ENG-2 (JEF00133)	Tested in accordance with EPA test methods as required by NSR permit 7482.	4/18/2019
ENG-1 (N6W00415)	Tested in accordance with EPA test methods as required by NSR permit 7482M1.	4/14/2020
ENG-2 (JEF00133)	Tested in accordance with EPA test methods as required by NSR permit 7482M1.	4/14/2020
ENG-3 (5283703258)	Tested in accordance with EPA test methods as required by NSR permit 7482M1.	8/12/2020
ENG-2 (JEF00133)	Tested in accordance with EPA test methods as required by NSR permit 7482M1.	10/18/2021
ENG-4 (368976)	Tested in accordance with EPA test methods as required by NSR permit 7482M1.	10/18/2021
ENG-3 (5283702815)	Tested in accordance with EPA test methods as required by NSR permit 7482M1.	10/19/2021
ENG-1 (N6W00415)	Tested in accordance with EPA test methods as required by NSR permit 7482M2.	11/2/2021

Section 19

Requirements for Title V Program

Do not print this section unless this is a Title V application.

Who Must Use this Attachment:

* Any major source as defined in 20.2.70 NMAC.
* Any source, including an area source, subject to a standard or other requirement promulgated under Section 111 - Standards of Performance for New Stationary Sources, or Section 112 Hazardous Air Pollutants, of the 1990 federal Clean Air Act ("federal Act"). Non-major sources subject to Sections 111 or 112 of the federal Act are exempt from the obligation to obtain an 20.2.70 NMAC operating permit until such time that the EPA Administrator completes rulemakings that require such sources to obtain operating permits. In addition, sources that would be required to obtain an operating permit solely because they are subject to regulations or requirements under Section 112(r) of the federal Act are exempt from the requirement to obtain an Operating Permit.
* Any Acid Rain source as defined under title IV of the federal Act. The Acid Rain program has additional forms. See http://www.env.nm.gov/aqb/index.html. Sources that are subject to both the Title V and Acid Rain regulations are encouraged to submit both applications simultaneously.
* Any source in a source category designated by the EPA Administrator ("Administrator"), in whole or in part, by regulation, after notice and comment.

19.1 - 40 CFR 64, Compliance Assurance Monitoring (CAM) (20.2.70.300.D.10.e NMAC)

Any source subject to 40CFR, Part 64 (Compliance Assurance Monitoring) must submit all the information required by section 64.7 with the operating permit application. The applicant must prepare a separate section of the application package for this purpose; if the information is already listed elsewhere in the application package, make reference to that location. Facilities not subject to Part 64 are invited to submit periodic monitoring protocols with the application to help the AQB to comply with 20.2.70 NMAC. Sources subject to 40 CFR Part 64, must submit a statement indicating your source's compliance status with any enhanced monitoring and compliance certification requirements of the federal Act.

The amine sweetening unit has pre-control VOC and H2S emissions greater than 100 TPY and does not have an applicable emission limitation or standard under NSPS or NESHAPs. The amine unit is subject to OOOOa 60.5365a and recordkeeping of 60.5423a(c) but only has to demonstrate <2LTD H2S in the acid gas stream. However, this unit cannot claim exemption under 64.2(b)(1)(i) since there is not an applicable post 1990 standard for VOC for this unit. Therefore, 3Bear believes this facility IS subject to 40 CFR 64.

The gunbarrel tank has pre-control VOC emissions greater than 100 TPY and does not have an applicable emission limitation or standard under NSPS or NESHAPs. The gunbarrel tank is a process vessel, not a storage vessel and does not meet the requirements of 40 CFR 60 Subpart Kb or 40 CFR 60 Subpart OOOOa. Therefore, 3Bear believes this facility IS subject to 40 CFR 64

19.2 - Compliance Status (20.2.70.300.D.10.a & 10.b NMAC)

Describe the facility's compliance status with each applicable requirement at the time this permit application is submitted. This statement should include descriptions of or references to all methods used for determining compliance. This statement should include descriptions of monitoring, recordkeeping and reporting requirements and test methods used to determine compliance with all applicable requirements. Refer to Section 2, Tables 2-N and 2-O of the Application Form as necessary. (20.2.70.300.D.11 NMAC) For facilities with existing Title V permits, refer to most recent Compliance Certification for existing requirements. Address new requirements such as CAM, here, including steps being taken to achieve compliance.

It is 3Bear's belief that the facility is in compliance with each applicable regulation found in Section 13. If the facility becomes out of compliance with any regulation, 3Bear will take immediate corrective action.

19.3 - Continued Compliance (20.2.70.300.D.10.c NMAC)

Provide a statement that your facility will continue to be in compliance with requirements for which it is in compliance at the time of permit application. This statement must also include a commitment to comply with other applicable requirements as they come into effect during the permit term. This compliance must occur in a timely manner or be consistent with such schedule expressly required by the applicable requirement.

The facility practices and procedures are in place to facilitate continued compliance with the requirements for which it is in compliance at the time of this permit application. If the facility becomes out of compliance with any regulation, 3Bear will take immediate corrective action. The facility will also comply with other applicable requirements as they come into effect during the permit term.

19.4 - Schedule for Submission of Compliance (20.2.70.300.D.10.d NMAC)

You must provide a proposed schedule for submission to the department of compliance certifications during the permit term. This certification must be submitted annually unless the applicable requirement or the department specifies a more frequent period. A sample form for these certifications will be attached to the permit.

3Bear will submit a compliance certification report within 30 days following the end of every reporting period.

19.5 - Stratospheric Ozone and Climate Protection

In addition to completing the four (4) questions below, you must submit a statement indicating your source's compliance status with requirements of Title VI, Section 608 (National Recycling and Emissions Reduction Program) and Section 609 (Servicing of Motor Vehicle Air Conditioners).

---

1. Does your facility have any air conditioners or refrigeration equipment that uses CFCs, HCFCs or other ozone-depleting substances? ☐ **Yes** ☑ **No**

2. Does any air conditioner(s) or any piece(s) of refrigeration equipment contain a refrigeration charge greater than 50 lbs? ☐ **Yes** ☑ **No**

   (If the answer is yes, describe the type of equipment and how many units are at the facility.)

3. Do your facility personnel maintain, service, repair, or dispose of any motor vehicle air conditioners (MVACs) or appliances ("appliance" and "MVAC" as defined at 82. 152)? ☐ **Yes** ☑ **No**

4. Cite and describe which Title VI requirements are applicable to your facility (i.e. 40 CFR Part 82, Subpart A through G.)

There are not any 40 CFR 82 requirements that apply to this facility.

19.6 - Compliance Plan and Schedule

Applications for sources, which are not in compliance with all applicable requirements at the time the permit application is submitted to the department, must include a proposed compliance plan as part of the permit application package. This plan shall include the information requested below:

A. Description of Compliance Status: (20.2.70.300.D.11.a NMAC)
A narrative description of your facility's compliance status with respect to all applicable requirements (as defined in 20.2.70 NMAC) at the time this permit application is submitted to the department.

B. Compliance plan: (20.2.70.300.D.11.B NMAC)
A narrative description of the means by which your facility will achieve compliance with applicable requirements with which it is not in compliance at the time you submit your permit application package.

C. Compliance schedule: (20.2.70.300D.11.c NMAC)
A schedule of remedial measures that you plan to take, including an enforceable sequence of actions with milestones, which will lead to compliance with all applicable requirements for your source. This schedule of compliance must be at least as stringent as that contained in any consent decree or administrative order to which your source is subject. The obligations of any consent decree or administrative order are not in any way diminished by the schedule of compliance.

D. Schedule of Certified Progress Reports: (20.2.70.300.D.11.d NMAC)
A proposed schedule for submission to the department of certified progress reports must also be included in the compliance schedule. The proposed schedule must call for these reports to be submitted at least every six (6) months.

E. Acid Rain Sources: (20.2.70.300.D.11.e NMAC)
If your source is an acid rain source as defined by EPA, the following applies to you. For the portion of your acid rain source subject to the acid rain provisions of title IV of the federal Act, the compliance plan must also include any additional requirements under the acid rain provisions of title IV of the federal Act. Some requirements of title IV regarding the schedule and methods the source will use to achieve compliance with the acid rain emissions limitations may supersede the requirements of title V and 20.2.70 NMAC. You will need to consult with the Air Quality Bureau permitting staff concerning how to properly meet this requirement.

NOTE: The Acid Rain program has additional forms. See http://www.env.nm.gov/aqb/index.html. Sources that are subject to both the Title V and Acid Rain regulations are **encouraged** to submit both applications **simultaneously**.

The facility is currently in compliance with applicable requirements; therefore, a compliance plan is not required.

19.7 - 112(r) Risk Management Plan (RMP)

Any major sources subject to section 112(r) of the Clean Air Act must list all substances that cause the source to be subject to section 112(r) in the application. The permittee must state when the RMP was submitted to and approved by EPA.

3Bear submitted a Risk Management Plan (RMP) on 9/12/2018. The EPA approved the RMP on 11/16/2018.

19.8 - Distance to Other States, Bernalillo, Indian Tribes and Pueblos

Will the property on which the facility is proposed to be constructed or operated be closer than 80 km (50 miles) from other states, local pollution control programs, and Indian tribes and pueblos (20.2.70.402.A.2 and 20.2.70.7.B NMAC)?

(If the answer is yes, state which apply and provide the distances.)

Texas: 43 km
Bernalillo County: 355 km
Indian Tribes and Pueblos: None

19.9 - Responsible Official

Provide the Responsible Official as defined in 20.2.70.7.AD NMAC: Scott Spicher, EVP and COO

Section 20

Other Relevant Information

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

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

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The following permit conditions are requested for the 3Bear Libby Gas Plant:

1. Individual HAP emissions will be less than 10 tpy. Facility wide HAP emissions will be less than 25 tpy.

2. Engine Emission Limits:
   - VOC less aldehydes emissions on ENG 3b-5b will be limited to 0.28 g/hp-hr

3. TK 1-8 and PWTK-1 will be controlled with a 98% control efficiency.

Section 22: Certification

Company Name: 3 Bear Delaware Operating – NM, LLC

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

Signed this ____ day of September, 2019, upon my oath or affirmation, before a notary of the State of

_____.

*Signature

9-10-19
Date

Scott Spicher
Printed Name

EVP and COO
Title

Scribed and sworn before me on this 10th day of September, 2019.

My authorization as a notary of the State of Colorado expires on the

8th day of May, 2022.

Notary's Signature

09.10.19
Date

Robin G. Machholz
Notary's Printed Name

Robin G Machholz
Notary Public
State of Colorado
Notary ID 20024015288
My Commission Expires May 08, 2022

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

1512 Larimer Street
Suite 540
Denver, CO 80202
PH: 303.626.8290

Attachment D

Compliance Assurance Monitoring Plans

CAM Plan—Unit AMINE-1

CAM Monitoring Protocols

40 CFR 64.2 states that the requirements of this part shall apply to an emissions unit at a major source if the unit satisfies *all* the following criteria:

1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant;
2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

Units subject to emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act are exempt from CAM (64.2(b)(i)). The Amine Unit (AMINE-1) controlled by Thermal Oxidizer (TO-1) is subject to the CAM requirement for VOC.

Background

A. Emissions Unit

Description:	Amine Unit
Identification:	AMINE-1
Facility:	3Bear Libby Gas Plant

B. Applicable Regulation and Pre-CAM Monitoring Requirements

Regulation:	40 CFR Part 64
Pre-CAM Monitoring Requirements:	None

C. Control Technology and Potential Emissions Rates

Controls:	Thermal Oxidizer TO-1 and Process Flare FL-1
Capture System:	The acid gas stream is piped to the TO-1. The flash gas stream is used as fuel gas or piped to FL-1.
Bypass:	During periods when TO-1 is inoperable the acid gas stream is piped to the FL-1.
Potential pre-control device emissions:	124.7 tpy VOC

Potential post-control device emissions: (includes flash gas, acid gas, and assist gas) 98% controlled, 11.4 tpy VOC

Compliance Assurance Monitoring Plan

AMINE-1 will be controlled by the thermal oxidizer with flaring as an option during periods of inoperability. Downtime of the thermal oxidizer and flare will be recorded. Flame presence, visible emissions, and flow volumes will be monitored for both devices. Combustion temperature of the thermal oxidizer will be continuously monitored.

Justification

Proper operation of the thermal oxidizer and flare should result in controlled emissions at or below permitted thresholds. Both units should be designed and operated with no visible emissions. By design, a well-maintained thermocouple-based alarm system will indicate whether a flame is present in each unit.

Measurement of flow, VOC content, and heating value to the thermal oxidizer and flare will be used to demonstrate that the units are achieving the required control efficiencies. The combustion temperature of the thermal oxidizer will be used to demonstrate that the required destruction efficiency is achieved.

Likewise, the operation of the flare as a control device is validated by adhering to the maximum tip velocity specifications identified in 40 CFR 60 Subpart A. Measurement of totalized flow volume will determine if the volumetric flow is in line with the flare design specifications, and whether the flare is compliant with the maximum velocity requirements of Subpart A.

The key elements of the monitoring approach are presented in the tables below.

Monitoring Approach: 3Bear Libby Gas Plant, TO-1

	Indicator No. 1	Indicator No. 2	Indicator No. 3	Indicator No. 4
I. Indicator [64.4(a)(1)]	Presence of combustion	Presence of visible emissions	Flow volume	Combustion temperature
Measurement Approach	The presence of combustion shall be monitored by a thermocouple with alarm that signals non-combustion of gas.	The thermal oxidizer shall be monitored for visible emissions.	Flow rate shall be measured continuously with a flow meter. The flow shall be totaled for each hour and each month.	Combustion temperature shall be monitored continuously and recorded once per 24-hr period.
II. Indicator Range [64.4(a)(2)]	Flame present (sensed) or no flame present (sensed).	Visible emissions present or not present.	Flow rate shall be within the design capacity parameters.	Within +/- 5% of the defined temperature, as determined during combustion test
III. Performance Criteria A. Data Representativeness [64.3(b)(1)]	Destruction depends upon the presence of a flame. If the flame is not present, VOCs are not being destroyed.	Efficient combustion is assumed if no visible emissions are observed.	Efficient combustion is assumed if flow rates are within the design capacity parameters.	Temperature is used as an indicator for destruction efficiency.
B. QA/QC Practices and Criteria [64.3(b)(3)]	Proper operation of the thermal oxidizer is achieved by maintaining the non-combustion thermocouple with alarm	Visible emissions to be determined in accordance with Method 22 of Appendix A of 40 CFR 60 Subpart A [(40	Verification shall be in accordance with design specifications.	Proper operation of the thermal oxidizer is demonstrated by maintaining the required

	system. Operators record the date and result of each such maintenance activity, and repairs or replacement are made as indicated.	CFR 60.18(f)(1)].		combustion temperature.
C. Monitoring Frequency [64.3(b)(4)]	The thermocouple is monitored continuously.	Visible emissions monitoring is performed at least annually or whenever visible emissions are observed.	Continuous monitoring with calculated hourly flow rate.	Continuous monitoring and recorded once per 24-hr period.
D. Data Collection Procedures [64.3(b)(4)]	Records shall be maintained of thermal oxidizer shutdown for any reason.	Records shall be maintained of all visible emissions observations	The hourly flow and monthly flow rates are to be calculated. Records of flow monitoring and calculated flow rates are to be maintained.	Records of the date and time of each temperature reading are to be maintained.
E. Averaging Period [64.3(b)(4)]	Not applicable.	Visible emissions are not to exceed a total of 5 minutes during any 2 consecutive hours.	Hourly and monthly flow rates are to be calculated.	Not applicable.

Monitoring Approach: 3Bear Libby Gas Plant, FL-1

	Indicator No. 1	Indicator No. 2	Indicator No. 3
I. Indicator [64.4(a)(1)]	Presence of combustion	Presence of visible emissions	Flow volume
Measurement Approach	The presence of combustion shall be monitored by a thermocouple with alarm that signals non-combustion of gas.	The flare shall be monitored for visible emissions.	Flow rate shall be measured continuously with a flow meter. The flow shall be totaled for each hour and each month.
II. Indicator Range [64.4(a)(2)]	Flame present (sensed) or no flame present (sensed).	Visible emissions present or not present.	Flow rate shall be operated within the operating velocities specified in 40 CFR 60.18(c).
III. Performance Criteria A. Data Representativeness [64.3(b)(1)]	Destruction depends upon the presence of a flame. If the flame is not present, VOCs are not being destroyed.	Efficient combustion is assumed if no visible emissions are observed.	Efficient combustion is assumed if operating velocities are within those specified in 40 CFR 60.18(c).
B. QA/QC Practices and Criteria [64.3(b)(3)]	Proper operation of the flare is achieved by maintaining the non-combustion thermocouple with alarm system. Operators record the date and result of each such maintenance activity, and repairs or	Visible emissions to be determined in accordance with Method 22 of Appendix A of 40 CFR 60 Subpart A [(40 CFR 60.18(f)(1)].	Verification shall be in accordance with 40 CFR 60.18(c).

	replacement are made as indicated.		
C. Monitoring Frequency [64.3(b)(4)]	The thermocouple is monitored continuously.	Visible emissions monitoring is performed at least annually or whenever visible emissions are observed.	Continuous monitoring with calculated hourly flow rate.
D. Data Collection Procedures [64.3(b)(4)]	Records shall be maintained of flare shutdown for any reason.	Records shall be maintained of all visible emissions observations	The hourly flow and monthly flow rates are to be calculated. Records of flow monitoring and calculated flow rates are to be maintained.
E. Averaging Period [64.3(b)(4)]	Not applicable.	Visible emissions are not to exceed a total of 5 minutes during any 2 consecutive hours.	Hourly and monthly flow rates are to be calculated.

CAM Plan—Unit TK-1

CAM Monitoring Protocols

40 CFR 64.2 states that the requirements of this part shall apply to an emissions unit at a major source if the unit satisfies *all* the following criteria:

1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant;
2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and
3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

The Gunbarrel Tank (TK-1) controlled by Tank Flare (FL-2) is subject to the CAM requirement.

Background

A. Emissions Unit

Description:	Gunbarrel Tank
Identification:	TK-1
Facility:	3Bear Libby Gas Plant

B. Applicable Regulation and Pre-CAM Monitoring Requirements

Regulation:	40 CFR Part 64
Pre-CAM Monitoring Requirements:	None

C. Control Technology and Potential Emissions Rates

Controls:	Tank Flare FL-2
Capture System:	Vapors from the Gunbarrel Tank are to FL-2.
Bypass:	None
Potential pre-control device emissions:	992.1 tpy VOC, 10.5 tpy benzene, 21.2 tpy n-hexane, 33.931 tpy total HAPs
Potential post-control device emissions:	98% controlled, 19.8 tpy VOC 98% controlled, 0.2 tpy benzene 98% controlled, 0.4 tpy n-hexane 98% controlled, 0.7 tpy total HAPs

Compliance Assurance Monitoring Plan

TK-1 will be controlled by the tank flare. Downtime of the flare will be recorded. Flame presence, visible emissions, and flow volumes will be monitored for the flare.

Justification

Proper operation of the flare should result in controlled emissions at or below permitted thresholds. The flare should be designed and operated with no visible emissions. By design, a well-maintained thermocouple-based alarm system will indicate whether a flame is present in the flare.

Measurement of flow, VOC content, and heating value to the flare will be used to demonstrate that the unit is achieving the required control efficiencies. In addition, the operation of the flare as a control device is validated by adhering to the maximum tip velocity specifications identified in 40 CFR 60 Subpart A. Measurement of totalized flow volume will determine if the volumetric flow is in line with the flare design specifications, and whether the flare is compliant with the maximum velocity requirements of Subpart A.

The key elements of the monitoring approach are presented in the table below.

Monitoring Approach: 3Bear Libby Gas Plant, FL-2

	Indicator No. 1	Indicator No. 2	Indicator No. 3
I. Indicator [64.4(a)(1)]	Presence of combustion	Presence of visible emissions	Flow volume
Measurement Approach	The presence of combustion shall be monitored by a thermocouple with alarm that signals non-combustion of gas.	The flare shall be monitored for visible emissions.	Flow rate shall be measured continuously with a flow meter. The flow shall be totaled for each hour and each month.
II. Indicator Range [64.4(a)(2)]	Flame present (sensed) or no flame present (sensed).	Visible emissions present or not present.	Flow rate shall be operated within the operating velocities specified in 40 CFR 60.18(c).
III. Performance Criteria A. Data Representativeness [64.3(b)(1)]	Destruction depends upon the presence of a flame. If the flame is not present, VOCs are not being destroyed.	Efficient combustion is assumed if no visible emissions are observed.	Efficient combustion is assumed if operating velocities are within those specified in 40 CFR 60.18(c).
B. QA/QC Practices and Criteria [64.3(b)(3)]	Proper operation of the flare is achieved by maintaining the non-combustion thermocouple with alarm system. Operators record the date and result of each such maintenance activity, and repairs or	Visible emissions to be determined in accordance with Method 22 of Appendix A of 40 CFR 60 Subpart A [(40 CFR 60.18(f)(1)].	Verification shall be in accordance with 40 CFR 60.18(c).

	replacement are made as indicated.		
C. Monitoring Frequency [64.3(b)(4)]	The thermocouple is monitored continuously.	Visible emissions monitoring is performed at least annually or whenever visible emissions are observed.	Continuous monitoring with calculated hourly flow rate.
D. Data Collection Procedures [64.3(b)(4)]	Records shall be maintained of flare shutdown for any reason.	Records shall be maintained of all visible emissions observations	The hourly flow and monthly flow rates are to be calculated. Records of flow monitoring and calculated flow rates are to be maintained.
E. Averaging Period [64.3(b)(4)]	Not applicable.	Visible emissions are not to exceed a total of 5 minutes during any 2 consecutive hours.	Hourly and monthly flow rates are to be calculated.