

Statement of Basis - Narrative

NSR Permit

Type of Permit Action: Regular-Significant Revision

Facility: Eagle Compressor Station
Company: XTO Energy Inc
Permit No(s): 7638M2 and No Title V at this time
Tempo/IDEA ID No.: 38232 - PRN20220001
Permit Writer: Joseph Kimbrell

Fee Tracking (not required for Title V)

Tracking	NSR tracking entries completed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	NSR tracking page attached to front cover of permit folder: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Paid Invoice Attached: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Balance Due Invoice Attached: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Invoice Comments: Balance due \$13,150.00; PIF on 3/10/2022

Permit Review	Date to Enforcement: NR	Date of Enforcement Reply: NR
	Date to Applicant: 3/31/2022	Date of Applicant Reply: 4/7/2022
	Date to EPA: TBD or N/A	Date of EPA Reply: TBD or N/A
	Date to Supervisor: Draft-3/17/22; 2 nd review 3/30/2022	

1.0 Plant Process Description:

The function of the facility is to separate oil, natural gas, and water from a nearby pipeline; temporarily store condensate onsite until it is removed via truck or pipeline; and compress dehydrated natural gas for transport through the sales line.

2.0 Description of this Modification:

XTO Energy Inc. is planning modification of the Eagle Compressor Station in Eddy County, NM. The facility is a typical compressor station with natural gas engines, dehydration, storage tanks, and flares. Site construction is planned under NSR Permit 7638M1. This is a New Source Review permit application being submitted in accordance with 20.2.72 NMAC. With this application, XTO plans to increase gas throughput and replace many of the engines previously permitted. Additionally, the dehydration systems will be modified and a flare added. Routine SSM emissions are included with the regular emissions of the facility.

The facility is proposing the following modifications:

- 1) Remove HTR2 and HTR3;
- 2) Remove ENG10 and ENG13;
- 3) Increase glycol circulation rate from 6.8 gpm to 27.6 gpm.
- 4) Decrease glycol regenerator reboiler (RB1-RB3) unit heat input from 3 MMBtu/hr to 2.0 MMBtu/hr;
- 5) Increase Dehy SSM from 200 hrs to 300 hrs
- 6) Increase flare purge gas rates;

- 7) Update FL1-FL3 heights to 145';
- 8) Update tank throughputs;
- 9) Decrease condensate truck loading;
- 10) Add inlet gas flaring;
- 11) Increasing steady state flaring associated with increased tank throughput and glycol circulation rate; update sources that vent to flare.
- 12) Update ENG1-9 and ENG11-12 VOC/formaldehyde/CO control efficiencies and update emissions factors from Caterpillar Gas Engine Rating Pro (GERP) analysis.
- 13) Update nomenclature of Gb1a and GB2a to SKT1 and SKT2.
- 14) Update facility location coordinates.
- 15) Update low-pressure separator pressure from 2 psig to 16 psig.
- 16) Added VOC malfunction emissions.
- 17) Added VRU1 and VRU2, controlling emissions from the LPS.

3.0 Source Determination:

1. The emission sources evaluated include the entire Eagle Compressor Station, both existing equipment and modifications included in this action.

2. Single Source Analysis:

- A. SIC Code: Do the facilities belong to the same industrial grouping (i.e., same two-digit SIC code grouping, or support activity)? Yes
- B. Common Ownership or Control: Are the facilities under common ownership or control? Yes
- C. Contiguous or Adjacent: Are the facilities located on one or more contiguous or adjacent properties? Yes

3. Is the source, as described in the application, the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes? Yes

4.0 PSD Applicability:

A. The source, as determined in 3.0 above, is a minor source before and after this modification.

5.0 History (In descending chronological order, showing NSR and TV): *The asterisk denotes the current active NSR and Title V permits that have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
	TBD	Initial Title V	Application due 12 months after facility starts operating as a Major Source. 20.2.70.300.B.(1) NMAC
			Facility is PSD Minor Source and Title V major Source
*7638-M2	TBD	Significant Revision	This is a New Source Review permit application being submitted in accordance with 20.2.72 NMAC. With this application, XTO plans to increase gas throughput and replace many of the engines previously permitted. Additionally, the dehydration systems will be modified and a flare added. Routine SSM emissions are included with the regular emissions of the facility.

5.0 History (In descending chronological order, showing NSR and TV): *The asterisk denotes the current active NSR and Title V permits that have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
7638-M1	2/06/19	Significant Revision	With this revision, XTO plans to increase gas throughput and replace many of the engines previously permitted. Additionally, the dehydration systems will be modified, the VRU and VRT removed, a low-pressure separator (LPS) added, and a Caterpillar 3306 TA (203 hp) added.
7638	5/17/18	NSR - New	Initial issuance

6.0 Public Response/Concerns: As of the issuance date of this permit, this permit writer is not aware of any public comment or concern. Public Involvement Plant approved on 2/10/2022. A letter expressing interest in the application and requesting a copy of the permit analysis was submitted by WildEarth Guardians to AQB 3/18/22.

7.0 Compliance Testing: No compliance testing has been conducted at this site since equipment not installed.

Unit No.	Compliance Test	Test Dates

8.0 Startup and Shutdown:

- A. If applicable, did the applicant indicate that a startup, shutdown, and emergency operational plan was developed in accordance with 20.2.70.300.D(5)(g) NMAC? NA
- B. If applicable, did the applicant indicate that a malfunction, startup, or shutdown operational plan was developed in accordance with 20.2.72.203.A.5 NMAC? Yes
- C. Did the applicant indicate that a startup, shutdown, and scheduled maintenance plan was developed and implemented in accordance with 20.2.7.14.A and B NMAC? Yes
- D. Does the facility have emissions due to routine or predictable startup, shutdown, and maintenance? If so, have all emissions from startup, shutdown, and scheduled maintenance operations been permitted? Yes

Compliance and Enforcement Status [Title V and NSR/PSD new or modification. Use this email template: Per 2/18/2022 email from Teri Waldron: *There is no outstanding notice of violation and no settlement agreement for which all actions have not been completed. Conditions from a settlement agreement, or any other applicable requirements, do not need to be included in the NSR permit.*

9.0 Modeling:

NSR 7638M2: Modeling reviewed by Eric Peters; email received 4/8/2022.

Modeling Assumptions: The facility operates continuously.

Permit Conditions: No additional permit conditions are required by this modeling.

Conclusion: This modeling analysis demonstrates that operation of the facility described in this report neither causes nor contributes to any exceedances of applicable air quality standards.

The standards relevant at this facility are NAAQS for CO, NO2, PM10, PM2.5, and SO2; NMAAQs

for CO, NO2, and SO2; and Class I and Class II PSD increments for NO2, PM10, PM2.5, and SO2.
Action: The permit can be issued based on this modeling analysis.

NSR 7638M1: Angela Raso approved modeling waivers on November 20, 2018 for the Eagle, Tiger, Maverick and Spartan Compressor Stations, based on Air Dispersion Modeling conducted for the Wildcat Compressor Station (NSR 7474M1). These 5 compressor station applications all use an identical site design, with identical allowable emissions, as represented by the applicant. The modeling analysis for the Wildcat Compressor station was done by Angela Raso. The following is from her report, dated 11/19/2018:

Permit Conditions: No additional conditions are required by this modeling.

Conclusion: This modeling analysis demonstrates that operation of the facility described in this report neither causes nor contributes to any exceedances of applicable air quality standards. The standards relevant at this facility are NAAQS for NO2, PM10, and PM2.5; NMAAQs for NO2; and Class I and Class II PSD increments for NO2, and PM10.

Action: The permit can be issued based on this modeling analysis.

10.0 State Regulatory Analysis(NMAC/AQCR):

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.1	General Provisions	Yes, Always	Entire Facility	The facility is subject to Title 20 Environmental Protection Chapter 2 Air Quality of the New Mexico Administrative Code so is subject to Part 1 General Provisions, Update to Section 116 of regulation for Significant figures & rounding. Applicable with no permitting requirements.
2.3	Ambient Air Quality Standards	Yes, for NSR, No for TV	Entire Facility	NSR: 20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide. Title V: 20.2.3.9 NMAC, LIMITATION OF APPLICABILITY TO 20.2.70 NMAC. The requirements of NMAAQs are not applicable requirements under 20.2.70 NMAC, as defined by 20.2.3.9 NMAC, 20.2.3.9 NMAC does not limit the applicability of this part to sources required to obtain a permit under the minor NSR regulation, 20.2.72 NMAC, nor does it limit which terms and conditions of NSR permits issued pursuant to 20.2.72 NMAC are applicable requirements in a Title V permit.
2.7	Excess Emissions	Yes, Always	Entire Facility	Applies to all facilities' sources
2.36 & 2.37	Petroleum Refineries and Petroleum Processing Facilities	No	Entire Facility	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.
2.38	Hydrocarbon Storage Facilities	Yes	OT1 – OT4	NMAC This regulation could apply to storage tanks at petroleum production facilities, processing facilities, tanks batteries, or hydrocarbon storage facilities. https://www.srca.nm.gov/parts/title20/20.002.0038.html

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No		This regulation could apply to sulfur recovery plants that are not part of petroleum or natural gas processing facilities.
2.61	Smoke and Visible Emissions	Yes	FL1-3, RB1-3, ENG1- 9, ENG11 -12, HTR1	<p>This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares unless your equipment is subject to another state regulation that limits particulate matter such as 20.2.19 NMAC (see 20.2.61.109 NMAC). If equipment at your facility was subject to the repealed regulation 20.2.37 NMAC it is now subject to 20.2.61 NMAC.</p> <p>[Following is for Title V permits only] NSR exempt engines that are not TV Insignificant are also listed in Condition A111A 20.2.61 NMAC Opacity. These combustion units are subject to 20.2.61 NMAC Opacity because that regulation is incorporated in the New Mexico State Implementation Plan (SIP). Regulations incorporated in the SIP are federally enforceable, and therefore units subject to 20.2.61 NMAC are included in the Title V permit even if the units are not in the NSR permit.</p>
2.70	Operating Permits	Yes	Entire Facility	The source is a Title V Major Source as defined at 20.2.70.7 NMAC.
2.71	Operating Permit Fees	Yes	Entire Facility	Source is subject to 20.2.70 NMAC as cited at 20.2.71.109 NMAC.
2.72	Construction Permits	Yes	Entire Facility	NSR Permits are the applicable requirement, including 20.2.72 NMAC.
2.73	NOI & Emissions Inventory Requirements	Yes, Always	Entire Facility	Applicable to all facilities that require a permit. PER > 10 tpy for a regulated air contaminant.
2.74	Permits-Prevention of Significant Deterioration	No	Entire Facility	The facility is not a major PSD site.
2.75	Construction Permit Fees	No	Entire Facility	This facility is subject to 20.2.72 NMAC.
2.77	New Source Performance Standards	Yes	See Sources subject to 40 CFR 60	Applies to any stationary source constructing or modifying and which is subject to the requirements of 40 CFR Part 60.
2.78	Emissions Standards for HAPs	No	See Sources subject to 40 CFR 61	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 61.
2.79	Permits Nonattainment Areas	No		This facility is not located in, not does it affect, a nonattainment area. Link to Non-attainment Link areas

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.82	MACT Standards for Source Categories of HAPs	Yes	See sources subject to 40 CFR 63	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63.

11.0 Federal Regulatory Analysis:

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
Air Programs Subchapter C (40 CFR 50)	National Primary and Secondary Ambient Air Quality Standards	Yes	Entire Facility	Independent of permit applicability; applies to all sources of emissions for which there is a Federal Ambient Air Quality Standard.
NSPS Subpart A (40 CFR 60)	General Provisions	Yes	See sources subject to a Subpart in 40 CFR 60	Applies if any other subpart applies.
40 CFR Part 60 Subpart IIII (Quad-I)	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	No		(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (3) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. [Following is for Title V permits only] NSR exempt engines are not Title V Insignificant Activities if the engines are subject to applicable requirements under 40 CFR 60 Subpart IIII. These units are incorporated in the Title V permit in Table 103 in the applicable regulations, as regulated units in Table 104A, and in the conditions for 40 CFR 60 Subpart IIII.
40 CFR Part 60 Subpart JJJJ (Quad -J)	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Yes	Potentially ENG1-9, ENG11-12	The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (5) of section 60.4230. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. [Following is for Title V permits only] NSR exempt engines are not Title V Insignificant Activities if the engines are subject to applicable requirements under 40 CFR 60 Subpart IIII. These units are incorporated in the Title V permit in Table 103 in the applicable regulations, as regulated units in Table 104A, and in the conditions for 40 CFR 60 Subpart IIII.
NSPS 40 CFR Part	Standards of Performance for	No		The rule applies to “affected” facilities that are constructed, modified, or reconstructed after Aug 23, 2011 (40 CFR

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
60 Subpart OOOO (Quad -O)	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			<p>60.5365): gas wells, including fractured and hydraulically refractured wells, centrifugal compressors, reciprocating compressors, pneumatic controllers, certain equipment at natural gas processing plants, sweetening units at natural gas processing plants, and storage vessels.</p> <p>If there is a standard or other requirement, then the facility is an “affected facility.” Currently there are standards for: gas wells (60.5375); centrifugal compressors (60.5380); reciprocating compressors (60.5385); controllers (60.5390); storage vessels (60.5395); equipment leaks (60.5400); sweetening units (60.5405).</p> <p>If standards apply, list the unit number(s) and regulatory citation of the standard that applies to that unit (e.g. Centrifugal Compressors 1a-3a are subject to the standards at 60.5380(a)(1) and (2) since we use a control device to reduce emissions)</p>
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, Compressors for ENG1-9, ENG11, ENG12 (TBD)	The storage tanks were constructed after the applicability date of the rule; however, tank emissions are controlled to < 6tpy by use of a flare with reduction efficiency of 98%.The regulation is applicable to the storage tanks but the tanks are not affected sources. The site uses low-bleed pneumatic controllers. The site is subject to leak monitoring from fugitive components. See 60.5360a
NESHAP Subpart A (40 CFR 61)	General Provisions	No	See sources subject to a Subpart in 40 CFR 61	Applies if any other subpart applies.
40 CFR 61 Subpart E	National Emission Standards for Mercury	No		The provisions of this subpart are applicable to those stationary sources which process mercury ore to recover mercury, use mercury chlor-alkali cells to produce chlorine gas and alkali metal hydroxide, and incinerate or dry wastewater treatment plant sludge
40 CFR 61 Subpart V	National Emission Standards for Equipment Leaks	No		This regulation ONLY applies if 40 CFR 61, Subpart J applies. Other regulations like 40 CFR 63, Subpart HH may incorporate specific sections of 61-V but that doesn’t make 61-V applicable.

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
	(Fugitive Emission Sources)			
MACT Subpart A (40 CFR 63)	General Provisions	Yes	See sources subject to a Subpart in 40 CFR 63	Applies if any other subpart applies.
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities –	Yes	DEHY1-3	As a major source of HAP, sources subject to HH include storage vessels with flash emissions, fugitive components, and compressors in VHAP service ((see §63.760(b)(1)(ii), (iii), and (iv)). Fugitives and compressors are exempt per §63.769(b) since they are subject to NSPS OOOOa. Storage vessels use a closed vent system connected to a combustor to comply with §63.766(b).The dehydrators process more than 3 mmscf/d; however, since benzene emissions are less than 1 tpy, there are no applicable requirements. (See §63.764(E)(1))
40 CFR 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities	No		This subpart applies to owners and operators of natural gas transmission and storage facilities that transport or store natural gas <u>prior</u> to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company), and that are major sources of hazardous air pollutants (HAP) emissions as defined in §63.1271. See link below 40 CFR 63 Subpart HHH
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	Potentially ENG1-9, ENG11-12	MAJOR SOURCE-As defined at 63.6585(b) and 63.6675, this facility is a major source of HAPs, emitting 16.6 TPY formaldehyde and 21.3 TPY Total HAPs. A facility is subject to this subpart if they own or operate a stationary RICE at an area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand. <u>A determination will be made, under §63.6600 once the specific engines are under contract.</u> [Following is for Title V permits only] NSR exempt engines are not Title V Insignificant Activities if the engines are subject to applicable requirements under 40 CFR 63 Subpart ZZZZ. These units are incorporated in the Title V permit in Table 103 in the applicable regulations, as regulated units in Table 104A, and in the conditions for 40 CFR 63 Subpart ZZZZ.
40 CFR 63 Subpart DDDDD (5-Ds)	National Emission Standards for Hazardous Air Pollutants for Major Sources:	No		See 63.7480 Example: Facility has boilers but not subject to MACT 5-D since it is not a major source of HAP emissions. (63.7485) OR Facility is subject to this subpart if it owns or operates an

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
	Industrial, Commercial, and Institutional Boilers and Process Heaters			<p>industrial, commercial, or institutional boiler or process heater as defined in §63.7575 that is located at, or is part of, a major source of HAP as defined in §63.2 or §63.761 (40 CFR part 63, subpart HH, National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities), except as specified in §63.7491.</p> <p>Example: Unit XXX will be (was) constructed Month XX, 20XX, before the applicability date of January 13, 2003, and has a heat input greater than 10 MMBTU/hr. It is a gaseous fuel process heater and must comply with the requirements of the Subpart by September 13, 2007. The other heaters (Units XX, YY, and ZZ) are exempt because their heat inputs are less than 10MM BTU/hr.</p>
40 CFR 63 Subpart CCCCC (6-Cs)	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	No		<p>§ 63.11111 Am I subject to the requirements in this subpart?</p> <p>(a) The affected source to which this subpart applies is each GDF that is located at an area source. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank.</p> <p>(b) If your GDF has a monthly throughput of less than 10,000 gallons of gasoline, you must comply with the requirements in §63.11116.</p> <p>(c) If your GDF has a monthly throughput of 10,000 gallons of gasoline or more, you must comply with the requirements in §63.11117.</p> <p>(d) If your GDF has a monthly throughput of 100,000 gallons of gasoline or more, you must comply with the requirements in §63.11118.</p> <p>(e) An affected source shall, upon request by the Administrator, demonstrate that their average monthly throughput is less than the 10,000-gallon or the 100,000-gallon threshold level, as applicable.</p> <p>(f) If you are an owner or operator of affected sources, as defined in paragraph (a) of this section, you are not required to obtain a permit under 40 CFR part 70 or 40 CFR part 71 as a result of being subject to this subpart. However, you must still apply for and obtain a permit under 40 CFR part 70 or 40 CFR part 71 if you meet one or more of the applicability criteria found in 40 CFR 70.3(a) and (b) or 40 CFR 71.3(a) and (b).</p> <p>(g) The loading of aviation gasoline storage tanks at airports is not subject to this subpart and the aviation gasoline is not included in the gasoline throughput specified in paragraphs (b) through (e) of this section.</p> <p>See Link</p>
40 CFR 64	Compliance Assurance	Yes	Potentially ENG1-9,	Potentially, the engines are subject. Analysis will be needed upon installation.

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
	Monitoring		DEHY1-3, LPS	<p>Units ENG1-9 are equipped with control devices and the uncontrolled CO2 emissions for each unit is above the Title V major source thresholds. However, they will be exempt for Part 64 for CO2 emission limitations if subject to JJJ (a federal regulation promulgated after 1990, per §64.2(b))</p> <p>Units ENG11-12 do not have uncontrolled emissions over the 100 tpy threshold.</p> <p>Tanks OT1-4 have uncontrolled VOC emissions over the Part 64 threshold. However, each tank's VOC emissions limitations are restricted by OOOOa (promulgated after 1990), so they are exempt.</p> <p>Dehydrator units DEHY1-3 and the low-pressure separator (LPS) are not exempt to Part 64 because 40 CFR 63, Subpart HH only established emissions limitations for Benzene only, not for all VOCs. However, Units DEHY1-3 and LPS are not subject to 40 CFR Part 64 because: the VOC flash tank vapors are captured and recycled in the dehydration system, and not vented to the atmosphere.</p>
40 CFR 68	Chemical Accident Prevention	No		<p>An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under §68.115 Threshold determination and 68.130 List of substances, 68 Use link for list and more info.</p> <p>The facility does not have more than a threshold quantity of a regulated substance in a process, as determined under §68.115 Threshold determination and 68.130.</p> <p>This regulation was revised in the Federal Register date 1-13-17. The effective date of the revision was delayed until March 21, 2017 (see FR 1-26-17).</p> <p>The permittee needs to review the changes to this regulation to verify if it is subject to any applicable requirements in the revised regulation and if so must meet those applicable requirements regardless if they are in the Title V permit.</p> <p>NSR & TV permits should include citation in applicability table in the permit, but no other specific permit conditions are required for NSR permits or TV permits. This is because the TV permit template includes a General Condition meeting the requirement of 68.215.</p>
40 CFR 70	Title V- State Operating Permit Programs	No		<p>Operating Permit Program – is not applicable – New Mexico State has full delegated authority and Title V is administered under 20.2.70 NMAC.</p>

**12.0 Exempt and/or Insignificant Equipment that do not require monitoring:
NSR Exempt Equipment (not entered into Tempo database)**

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction ²
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction ²
ROAD	Haul Road Emissions	N/A	N/A	N/A	20.2.72.202.B.5	N/A
			N/A	N/A	20.2.72.202.B.5	N/A

13.0 New/Modified/Unique Conditions (Format: Condition#: Explanation):

- A. Date of Monitoring Protocol used for IC Engines: December 11, 2019, reviewed & no changes
- B. Date of Monitoring Protocol used for Tanks & Loading: September 19, 2017, reviewed & no changes
- C. Date of Monitoring Protocol used for Glycol Dehydrators: February 12, 2018, reviewed & no changes
- D. Date of Monitoring Protocol used for Flares:
- E. Date of NSR Part A. Permit template is June 30, 2021. Updated
- F. Updated PER Tables 102.A&B
- G. Table 104.A, added SSM Activities, miscellaneous updates and deleted units.
- H. Table 105.A: Added DEHY1 – DEHY3 SSM, deleted CAT13-ENG13.
- I. Table 106.A Updated all unit’s emissions, other unit name updates and deletions.
 - 13.I.1 Still didn’t add FUG-VOCs emission limits since value was at 22.16 still below 25 tpy.
- J. Table 107.A, totally replaced table due to all combustion SSM activities. Followed XTO-Cowboy CDP permit for handling Inlet flaring as excess emissions.
- K. Added new SSM Specific Conditions A107.D, E, F & G.
- L. Deleted Specific Condition A201.E Catalytic Converter Operation (Unit ENG13) since ENG13 has been removed from the permit, never installed.
- M. Condition A110.A Fuel and Fuel Sulfur: The application states that 5 grains/100 scf of H2S was used – not total sulfur. The emission factor of 0.01157 lb/MMBtu (in the engine spreadsheet) equates to about 4 gr/100 scf total sulfur. Changed 5 to 4.
- N. Specific Condition A203.A revised description of Crude Oil Tanks to Crude Oil/Condensate since application showed Condensate and previous permit showed Crude Oil tanks. Updated through puts values as represented by each tank based on calculations. Previous permit based through put on entire facility.

14.0 For Title V action: Cross Reference Table between NSR Permit 7638M2 and TV Permit TBD. NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit:

Changed by NSR*	NSR Condition # 7638M2	TV Section #-TBD
	A100 Introduction	A100 Introduction
	A101 Permit Duration	A101 Permit Duration
X	A102 Facility Description	A102 Facility Description
X	Table 102.A Total Potential Emissions	Table 102.A Total Potential Emissions
X	A103 Facility: Applicable Regulations	A103 Facility: Applicable Regulations
X	A104 Facility: Regulated Sources	A104 Facility: Regulated Sources
X	A105 Facility: Control Equipment	A105 Facility: Control Equipment
X	A106 Facility: Allowable Emissions	A106 Facility: Allowable Emissions
XXX	A107 Facility: Allowable SSM	A107 Facility: Allowable SSM
X	A107.C SSM Emissions (Units ENG 1-9, ENG11, ENG12)	A107.C SSM
X	A107.D Emergency Inlet Flaring Emissions	
X	A107.E SSM Flaring (Units FL1-FL3 Blowdown-SSM, FL1-FL3 FTV-SSM)	
X	A107.F Malfunction Emissions [for venting of gas, VOC]	
X	A107.G DEHY1 – DEHY3 SSM	
	A108 Facility: Hours of Operations	A108 Facility: Hours of Operations
	A109 Facility: Reporting Schedules NR for NSR	A109 Facility: Reporting Schedules
		A109.A TV Semi-Annual
		A109.B TV ACC
		A109.C NSR Quarterly Reporting
X changed 5 to 4	A110 Facility: Fuel and Fuel Sulfur Requirements	A110 Facility: Fuel Sulfur Requirements
X	A111.A 20.2.61 NMAC Opacity Limit (Units ENG1-9, ENG11-12, FL1, FL2, FL3, RB1-RB3, HTR1)	A111
X	A201.A Engines: Notification of Catalysts Installation (Units ENG1-9, ENG11-12)	
X	A201.B Periodic Emissions Testing (Units ENG1-9, ENG11-12)	
X	A201.C Initial Compliance Test (Units ENG1-9, ENG11-12)	
X	A201.D Catalytic Converter Operation (Units ENG1-9, ENG11-12)	
X	A201.E 40 CFR 60, Subpart JJJ (Units ENG1-9, ENG11-12)	

Changed by NSR*	NSR Condition # 7638M2	TV Section #-TBD
X	A201.F 40 CFR 60, Subpart OOOOa – (Reciprocating Compressors associated with Units ENG1-9, ENG11-12)	
X	A201.G 40 CFR 63, Subpart ZZZZ (Units ENG1-9, ENG11-12)	
	A202.A Glycol Dehydrator – Extended Gas Analysis and GRI-GLYCalc Calculation (Units DEHY1 - 3)	
	A202.B Glycol pump circulation rate (Units DEHY1 - 3)	
	A202.C Control Device Inspection (Units FL1, FL2, FL3, COND1-3)	
	A202.D Flares (Units FL1, FL2, FL3): Control Device for BTEX Condensers (COND1-COND3)	
	A202.E 40 CFR 63, Subpart HH (Units DEHY1, DEHY2, DEHY3)	
	A203 Tanks and Low-Pressure Separator	
X	A203.A Crude Oil/Condensate Tanks Throughput (Units OT1-4)	
X	A203.B Skim Tank Throughput (Primary Unit SKT1 or Backup Unit SKT2)	
X	A203.C Flares (Units FL1, FL2, FL3): Control Device for Oil/Condensate Tanks (Units OT1-4), Skim Tank (SKT1 and SKT2), and Low-Pressure Separator (LPS)	
X	A203.D Truck Loading – Crude Oil/Condensate Loadout (Unit Load)	
	A203.E 20.2.38 NMAC, Hydrocarbon Storage Facilities (Units OT1-4)	
	A204 Heaters/Boilers	
X	A204.A Operational Inspections of Boilers and/or Heaters (Units RB1, RB2 & RB3)	
X	A204.B Units RB1-RB3, HTR1: See Conditions A110 and A111. Compliance with the emission limits in Table 106.A is demonstrated by complying with those conditions.	
	A205 Turbines – Not Required	A205 Turbines – Not Required
	A206.A Flare Flame & Visible Emissions (20.2.61 NMAC) (Units FL1, FL2, FL3)	
	A206.B Flare Operation Requirement (Units FL1, FL2, FL3)	

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	A206.C Flaring Emissions (Units FL1, FL2, FL3)	
X	A206.D Flare Parametric Monitoring for Low Pressure Sides - Low Pressure Side Pilots and Vapors from Oil Tanks and Dehydrator (Units FL1, FL2, FL3)	
	A207 Sulfur Recovery Unit - NR	A207 Sulfur Recovery Unit - NR
	A208.A Amine Unit - NR	A208.A Amine Unit - NR
	A209.A 40 CFR 60, Subpart OOOOa – Fugitives (Unit FUG)	
X	Part B General Conditions	

15.0 Permit specialist's notes to other NSR or Title V permitting staff concerning changes and updates to permit conditions.

- A. This facility as proposed is a major source and therefore a Title V facility, once operations begin as represented in the application.
- B. As of March 18, 2022, this facility is under construction with few units installed.