PROPOSED as of September 26, 2022

Statement of Basis - Narrative

Title V Permit

Type of Permit Action: New Title V permit

Facility: **Wildcat Compressor Station**
Company: XTO Energy Inc
Permit No(s).: 7474M2 and P290
Tempo/IDEA ID No.: 38056 - PRT20200001
Permit Writer: Julia Kuhn

Permit Review		
	Date to Enforcement: NA	**Date of Enforcement Reply:** NA
	Date to Applicant: 9/1/2022	**Date of Applicant Reply:** 9/23/2022
	Date to EPA: 9/26/2022	**Date of EPA Reply:** TBD
	Date to Supervisor: 7/13/2022, 7/19/2022, 8/23/2022, 9/26/2022	

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.

Field gas flows into two inlet slug catchers. The site uses natural gas engines to compress the gas to 1100 to 1300 psig including nine (9) Caterpillar G3616 engines (ENG1-ENG9) and two (2) Caterpillar 3516JTA engines (ENG11-ENG12). The Caterpillar engines are equipped with oxidation catalysts to reduce CO, VOC, and formaldehyde emissions.

The high-pressure natural gas is dehydrated using triethylene glycol dehydration units (DEHY1-DEHY3), each handling up to 80 MMscfd each. The systems are equipped with flash tanks and condensers. Flash tank vapors are recycled in the dehydration system back to the station inlet. The glycol still vent vapors are routed to condensers. Uncondensed vapors from the condensers are routed to the low-pressure side of the flares FL1-FL3. Dehydrated gas is then transferred to a sales pipeline.

High-pressure liquids generated anywhere in the system are dumped to a three-phase high pressure separator (HPS) operating at 300-500 psig. Natural gas liquids (NGLs) from the high-pressure separator are routed to pipeline, water routes to redundant skim tanks (SKT1/SKT2), and gas is routed back to the inlet slug catcher. Low pressure liquids generated anywhere in the system are dumped to a three phase ultra-low-pressure separator (LPS). Vapors from the LPS are controlled by a VRU and routed to the flare system during VRU downtime (FL1/FL2/FL3). From the LPS, oil at approximately 15 psig is dumped to four (4) oil storage tanks (OT1-OT4), which are controlled by the flare system (FL1/FL2/FL3). Water from the LPS flows to redundant skim tanks (SKT1/SKT2). The skim tanks are arranged as a redundant system in which one unit can be used if another is down for unforeseen circumstances. Water is then dumped to two (2) water tanks (WT1-WT2). Any residual oil flows from the skim tanks into the oil storage tanks. Vapors from the water storage tanks and skim tanks are also controlled by the flare system (FL1/FL2/FL3). Oil and water are transferred via pipeline or trucked offsite.

The flare system (FL1/FL2/FL3) is also used to flare gas in the event of an emergency. SSM emissions from equipment maintenance are routed to either the low pressure or high-pressure flare header (FL1/FL2/FL3). SSM-related VOC emissions (tank landings, cleanings, pigging, compressor blowdowns, equipment blowdowns, etc.) are included at a rate of 10 tons per year per New Mexico Air Quality Bureau guidance.

2.0 Description of this Modification:

This application is submitted under section 20.2.70.200.A of the New Mexico Administrative Code (NMAC) to obtain an operating permit. The Wildcat Compressor Station is a typical compressor station with natural gas engines, dehydration, storage tanks, and flares. The TV operating permit incorporates the most recent New Source Review (NSR) Permit 7474M2, issued on February 11, 2022.

3.0 Source Determination:

1. The emission sources evaluated include the Wild Cat Compressor Station.

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:

Title V action does not determine PSD applicability; see the History Table for a summary of previous PSD applicability determinations.

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

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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)
*P290	TBD	Title V New	This application is submitted under section 20.2.70.200.A of the New Mexico Administrative Code (NMAC) to obtain an operating permit. The TV operating permit incorporates the most recent New Source Review (NSR) Permit 7474M2, issued on February 11, 2022.

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)
*7474M2	2/11/2022	Significant Revision	Revision of emission factors, removal & addition of some equipment, increase of tank throughput and steady state flaring. See detailed information on the previous page.
7474-M1	2/6/2019	Significant Revision	This revision included an increase in gas throughput and replaced many of the engines previously permitted. Additionally, the dehydration systems were modified, the VRU and VRT removed, a low-pressure separator (LPS) added, and a Caterpillar 3306 TA (203 hp) added.
*7474	1/03/18	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.

7.0 **Compliance Testing:**

Initial compliance tests were performed on ENG1, ENG2, ENG3, ENG11, and ENG12 between March 24 and March 26, 2020. Subsequent compliance tests were performed for ENG1, ENG2, ENG3, ENG11, and ENG12 between September 2 and September 11, 2020, and between August 30 and September 1, 2021. Testing demonstrated compliance with emission limitations.

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? **Yes**
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**

9.0 **Compliance and Enforcement (C&E) Status:** Per C&E email received on July 22, 2021: "*There is no outstanding notice of violation and no settlement agreement for which all actions have not been completed. No compliance plan needs to be placed in the Title V Permit.*"

10.0 **Modeling:** Per modeling report by Angela Raso dated August 20, 2020: "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, PM2.5, PM10, and SO2; NMAAQS for CO, NO2, and SO2; and Class I and Class II PSD increments for NO2, PM10, PM2.5, and SO2."

11.0 **State Regulatory Analysis(NMAC/AQCR):**

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.1	General Provisions	Yes	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	No	NA	**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	Entire Facility	Applies to all facilities' sources
2.38	Hydrocarbon Storage Facilities	Yes	OT1-4	20.2.38 NMAC This regulation applies to storage tanks at petroleum production facilities, processing facilities, tanks batteries, or hydrocarbon storage facilities. The permittee complies with 2.38.112 NMAC by controlling emissions with a flare. Produced water does not meet the definition of crude or condensate; so 20.2.38 does not apply to WT1, WT2, SKT1, and SKT2.
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	NA	This regulation could apply to sulfur recovery plants that are not part of petroleum or natural gas processing facilities.

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.50	Oil and Gas Sector - Ozone Precursor Pollutants	Yes	RICE units ENG1-9, ENG11-12; DEHY1-3; FL1-3; VRU1-2; FUG; LOAD; OT1-4; Natural Gas Driven Pneumatic Controllers and Pumps; Pig Launching and Receiving; and Compressor Seals	20.2.50.113 NMAC – Engines and Turbines. The natural gas-fired spark ignition engines (ENG1-9 and ENG11-12) and are subject to the applicable requirements of this subpart. 20.2.50.114 NMAC – Compressor Seals. Each of the eleven reciprocating compressors will comply with applicable wet seal fluid degassing system emissions control requirements and applicable rod packing replacement requirements. 20.2.50.115 NMAC – Control Devices and Closed Vent Systems The flares (FL1-3), vapor recovery units (VRU1-2), and associated closed vent systems are subject to the requirements of this subpart. 20.2.50.116 NMAC – Equipment Leaks and Fugitive Monitoring The piping and equipment components at the facility are subject to the applicable audio, visual, and olfactory (AVO) inspections; EPA M21 or optical gas imaging (OGI) inspections; and leak repair and replacement requirements of this subpart. 20.2.50.118 NMAC – Glycol Dehydrators The glycol dehydrators (DEHY1-3) have a PTE of ≥ 2 tpy VOC and are subject to the requirements of this subpart. 20.2.50.119 NMAC – Heaters The fuel line heater (HTR1) and the glycol regenerator reboilers (RB1-3) are natural gas-fired heaters with a rated heat input < 20 MMBtu/hr; therefore, they are not subject to the requirements of this subpart. 20.2.50.120 NMAC – Hydrocarbon Liquid Transfers The oil/condensate truck loading (LOAD) is subject to the requirements of this subpart except for facilities meeting an exemptions at 20.2.50.120.A(1)-(3) NMAC. 20.2.50.121 NMAC – Pig Launching and Receiving Individual pipeline pig launcher and receiver operations with PTE ≥ 1 tpy VOC located within the property boundary and under common ownership and control is subject to the requirements of this subpart. 20.2.50.122 NMAC – Pneumatic Controllers and Pumps Natural gas-driven pneumatic controllers or pumps are subject to the requirements of this subpart. 20.2.50.122 NMAC – Pneumatic Controllers and Pumps Natural gas-driven pneumatic controllers or pumps are subject to the requirements of this subpart.

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.50 (continued)				**Note future applicability**: determination to be made concerning demonstration of compliance with Part 50 for the dehydrator still vents and the tanks.
2.61	Smoke and Visible Emissions	Yes	FL1-3, RB1-3, ENG1-9, ENG11-12, HTR1	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). This regulation applies to the engines, flares, and re-boilers at the facility because they are stationary combustion equipment.
2.70	Operating Permits	Yes	Entire Facility	The source is a Title V Major Source as defined at 20.2.70.7 NMAC. PTE is ≥ 100 TPY for NOx, CO, and VOCs. PTE is ≥ 10 TPY Formaldehyde.
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. This facility is subject to 20.2.72 NMAC and NSR Permit 7474M2.
2.73	NOI & Emissions Inventory Requirements	Yes	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	NA	The facility is not a major PSD site. This regulation does not apply. **20.2.74.7.AG (1)** A stationary source listed in Table 1 of this Part (20.2.74.501 NMAC) which emits, or has the potential to emit, emissions equal to or greater than one hundred (100) tons per year of any stack and fugitive emissions (as defined) of any regulated air pollutant; or **20.2.74.7.AG (2)** A stationary source not listed in Table 1 of this Part (20.2.74.501 NMAC) and which emits or has the potential to emit stack emissions of two hundred fifty (250) tons per year or more of any regulated pollutant;
2.75	Construction Permit Fees	No	Entire Facility	No, in accordance with 20.2.75.11.E an annual NSR enforcement and compliance fee shall not apply to sources subject to 20.2.71 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.

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
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.
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.

12.0 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. Subparts JJJJ and OOOOa apply.
40 CFR Part 60 Subpart JJJJ (Quad -J)	Standards of Performance for Stationary Spark. Ignition Internal Combustion Engines	Yes	ENG1-3 and ENG11-12, potentially ENG4-9	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. This regulation applies because the construction date for the engines is or will be after the applicability date of June 12, 2006, in 60.4230 (a)(4). Units ENG1-ENG3 are 5,000 hp 4SLB engines constructed after 7/1/2010. Units ENG11-ENG12 are 1,380 hp 4 SLB engines constructed after 7/1/2010. Therefore, the units are subject at §60.4230(a)(4)(i) and are subject to the emission limitations in Table 1 per 40 CFR 60.4233(e). ENG4-9 will be evaluated for applicability under subpart JJJJ upon installation.
NSPS	Standards of Performance for		Compressors	The oil and water storage tanks are or will be constructed after

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
40 CFR Part 60 Subpart OOOOa	Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015		for ENG1-9 ENG11-12, FUG	the applicability date; however, the water tank emissions are < 6tpy uncontrolled, and therefore, do not fall under OOOOa applicability. OT1-4 and SKT-1-2: Emissions are controlled to < 6tpy by use of a flare with collection efficiency of 98%. The facility uses low-bleed pneumatic controllers. Compressors: Per §60.5365a(c), the Compressors associated with engines (ENG1-9, ENG11-12) are subject to the control standards of §60.5385a. Fugitives: Under §60.5365a (j), the collection of fugitive emissions components at a compressor station, as defined in §60.5430a, is an affected facility. The facility will be subject to leak monitoring from fugitive components, per §60.5397a.
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.
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. Subparts HH and ZZZZ apply. This facility is a major source of HAPS, emitting 20.5 tpy formaldehyde; and 28.1 tpy total HAPs.
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities –	Yes	DEHY1-3	The facility is a natural gas production field facility, located prior to the point of custody transfer, under definitions in 63.761. Therefore, the definition of Major Source in 63.761 provides that only HAP emissions from glycol dehydration units and storage vessels shall be aggregated for a major source determination. AREA SOURCE (Minor for HAPs): given the definitions above, this facility is an area source under HH. EXEMPTIONS: The facility contains affected sources (TEG glycol dehydrators, 63.760(b)(2)). However, being an Area Source, and actual benzene emissions from each individual unit is less than 0.90 megagrams per year (< 1 tpy), the dehydrators are exempt (63.764(e)(1)(ii)), and the facility is only required to

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				maintain records of the determination as required in §63.774(d)(1).
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)		ENG1-3, ENG11-12, Potentially ENG4-9	MAJOR SOURCE-As defined at 63.6585(b) and 63.6675, this facility is a major source of HAPs, emitting 20.5 TPY formaldehyde and 28.1 TPY Total HAPs. Per §63.6590(a)(2), Units ENG1-3 and ENG11-12 are subject: *New stationary RICE.* (i) A stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after December 19, 2002. ENG4-9 will be evaluated for applicability under subpart ZZZZ upon installation.
40 CFR 64	Compliance Assurance Monitoring	No	NA	The Low Pressure Separator (Unit LPS) at the station requires control devices (VRU1-2). The VOC emissions are directed to VRU1 or VRU2 (back-up) in closed loop system. During the 10% VRU downtime the emissions are directed to the flares for combustion. The emissions do not meet the major source threshold, and therefore, the LPS is controlled by VRU1-2 is not subject to Part 64. The facility contains affected sources: glycol dehydrators and condensate storage tanks (63.760(b)(2)). The facility is an area source of HAPs as defined by Subpart HH. The dehydrator flash tank vapors are captured and routed back to the inlet. Routing back to process does not meet the 40 CFR 64 definition of control device, therefore, the emissions from DEHY1-3 are not subject to CAM, Emissions from the condensate tanks are not included in the HAP major source determination as the tanks do not have an actual annual average hydrocarbon liquid throughput equal to or greater than 79,500 liters per day (500 barrels per day). Units OT1-4 are equipped with a control device (FL1, 2, 3) and the uncontrolled emissions for this unit are above the Title V major source thresholds. However, the condensate tanks TO1-4 are exempt from Part 64 because they are subject to VOC emission limitations in Subpart OOOOa (promulgated after 1990).

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
				ENG1-9, ENG11-12 are exempt from Part 64 because they are subject to NOx, CO, and VOC emissions limitations in Subpart JJJJ (promulgated after 1990).
40 CFR 68	Chemical Accident Prevention	No		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. 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.
40 CFR 70	Title V- State Operating Permit Programs	No		Operating Permit Program – is not applicable – New Mexico State has full delegated authority and Title V is administered under 20.2.70 NMAC.
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	No		This regulation is not applicable because the facility does not service, maintain, or repair appliances, dispose of appliances, refrigerant reclaimers

13.0 Exempt and/or Insignificant Equipment that do not require monitoring:

Title V - Insignificant Activities (Dated March 24, 2005) as defined by 20.2.70.7.Q NMAC**:**
Insignificant List Link

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

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

A. Date of Monitoring Protocol used for IC Engines: December 11, 2019.
B. Date of Monitoring Protocol used for Tanks & Loading: September 19, 2017.
C. Date of Monitoring Protocol used for Glycol Dehydrators: February 12, 2018.
D. Date of Monitoring Protocol used for Boilers and Heaters: August 18, 2017.
E. Date of Monitoring Protocol used for Flares: April 20, 2021.
F. NMAC 50: Ozone Precursor Pollutants: added several conditions for engines, dehydrators, flares, VRUs, tanks, loading, natural gas driven pneumatic controllers and pumps, pig launching and receiving, compressor seals, and fugitive units subject to 20.2.50 NMAC

15.0 For Title V action: Cross Reference Table between NSR Permit 7474M2 and TV Permit P290.

NSR permit conditions cross referenced to the TV permit are federally enforceable conditions, and therefore brought forward into the TV permit:

Changed by TV*	NSR Condition #	TV Section #
	A100 Introduction	A100 Introduction
	A101 Permit Duration	A101 Permit Duration
	A102 Facility Description	A102 Facility Description
	Table 102.A Total Potential Emissions	Table 102.A Total Potential Emissions
XX	A103 Facility: Applicable Regulations	A103 Facility: Applicable Regulations (added Part 50)
	A104 Facility: Regulated Sources	A104 Facility: Regulated Sources
	A105 Facility: Control Equipment	A105 Facility: Control Equipment
	A106 Facility: Allowable Emissions	A106 Facility: Allowable Emissions
	Table 106.B Subpart JJJJ Emission Limits	Table 106.B Subpart JJJJ Emission Limits
XX	(before effective date of Part 50)	Table 106.C Part 50 Engine Limits
XX	(before effective date of Part 50)	Table 106.D Part 50 Engine Limits
	A107 Facility: Allowable SSM	A107 Facility: Allowable SSM
	A107.C SSM Flare	A107.C SSM Flare
	A107.D SSM Venting	A107.D SSM Venting
	A107.E Malfunction	A107.E Malfunction
	A108 Facility: Allowable Operations	A108 Facility: Hours of Operations
XX	A109 Facility: Reporting Schedules NR for NSR	A109 Facility: Reporting Schedules
XX		A109.A TV Semi-Annual
XX		A109.B TV ACC
	A110 Facility: Fuel Sulfur Requirements	A110 Facility: Fuel Sulfur Requirements
	A111 Facility: 20.2.61 Opacity	A111 Facility: 20.2.61 Opacity
	A201.A Engines: Periodic Testing (Units ENG1-9, ENG11-12)	A201.A Engines: Periodic Testing (Units ENG1-9, ENG11-12)
	A201.B Engines: Initial Compliance Testing (Units ENG4-9)	A201.B Engines: Initial Compliance Testing (Units ENG4-9)
	A201.C Catalytic Convertor Operations (Units ENG1-9, ENG11-12)	A201.C Catalytic Convertor Operations (Units ENG1-9, ENG11-12)
	A201.D/E 40 CFR 60, Subpart JJJJ (ENG1-9, ENG11-12)	A201.D/E 40 CFR 60, Subpart JJJJ (ENG1-9, ENG11-12)
	A201.F/G 40 CFR 60, Subpart ZZZZ (ENG1-9, ENG11-12)	A201.F/G 40 CFR 60, Subpart ZZZZ (ENG1-9, ENG11-12)
XX	(before effective date of Part 50)	A201.H Part 50 engine condition
XX	(before effective date of Part 50)	A201.I Part 50 compressor seal condition
	A202 Glycol Dehydrator	A202 Glycol Dehydrator
	A202.A Extended Gas Analysis and GRI-GLYCalc Calculation (Units DEHY1-3)	A202.A Extended Gas Analysis and GRI-GLYCalc Calculation (Units DEHY1-3)
	A202.B Glycol Pump Circulation Rate (DEHY1-3)	A202.B Glycol Pump Circulation Rate (DEHY1-3)

Changed by TV*	NSR Condition #	TV Section #
	A202.C Control Device Inspection (Units COND1-3 and RB1-3 or FL1-3)	A202.C Control Device Inspection (Units COND1-3 and RB1-3 or FL1-3)
	A202.D 40 CFR 63, Subpart HH (DEHY1-3)	A202.D 40 CFR 63, Subpart HH (DEHY1-3)
XX	(before effective date of Part 50)	A202.E Part 50 dehy condition
XX	(before effective date of Part 50)	A202.F Part 50 – reference to control condition in A203.I
	A203 Tanks: Condensate, Skim, and Produced Water Tanks, Low-Pressure Separator, and VRUs	A203 Tanks: Condensate, Skim, and Produced Water Tanks, Low-Pressure Separator, and VRUs
	A203.A Low Pressure Separator (LPS) and Control Devices (Vapor Recovery Units VRU1, VRU2 and Flares FL1, FL2, FL3)	A203.A Low Pressure Separator (LPS) and Control Devices (Vapor Recovery Units VRU1, VRU2 and Flares FL1, FL2, FL3)
	A203.BCondensate Tank Throughput (Units OT1-4)	A203.B Condensate Tank Throughput (Units OT1-4)
	A203.C Skim Tank Throughput (Units SKT1 and SKT2)	A203.C Skim Tank Throughput (Units SKT1 and SKT2)
	A203.D Flares (Units FL1, FL2, FL3): Control Device for Condensate Tanks (Units OT1-4), Produced Water Tanks (WT1, WT2), and Skim Tanks (SKT1, SKT2)	A203.D Flares (Units FL1, FL2, FL3): Control Device for Condensate Tanks (Units OT1-4), Produced Water Tanks (WT1, WT2), and Skim Tanks (SKT1, SKT2)
	A203.E Truck Loading – Condensate Loadout (Unit Load)	A203.E Truck Loading – Condensate Loadout (Unit Load)
	A203.F: 20.2.38 NMAC Tanks	A203.F: 20.2.38 NMAC Tanks
XX	(before effective date of Part 50)	A203.G Part 50 load condition
XX	(before effective date of Part 50)	A203.H Part 50 tank condition
XX	(before effective date of Part 50)	A203.I Part 50 control device/closed vent system condition
	A204 Heaters/Boilers	A204 Heaters/Boilers
	A204.A Operational Inspections of Boilers and/or Heaters (Units RB1, RB2 & RB3; HTR1)	A204.A Operational Inspections of Boilers and/or Heaters (Units RB1, RB2 & RB3; HTR1)
	A204.B Reference – dehy emission compliance	A204.B Reference – dehy emission compliance
	A205 Turbines – Not required	A205 Turbines – Not required
	A206 Flares	A206 Flares
	A206.A Flare Flame & Visible Emissions (20.2.61 NMAC) (Units FL1, FL2, FL3)	A206.A Flare Flame & Visible Emissions (20.2.61 NMAC) (Units FL1, FL2, FL3)
	A206.B Flare Operation Requirement (Units FL1, FL2, FL3)	A206.B Flare Operation Requirement (Units FL1, FL2, FL3)
	A206.C Flaring Emissions (Units FL1, FL2, FL3)	A206.C Flaring Emissions (Units FL1, FL2, FL3)
	A206.D Flare Parametric Monitoring for Low Pressure Sides - Low Pressure Side Pilots and Vapors from Condensate Tanks	A206.D Flare Parametric Monitoring for Low Pressure Sides - Low Pressure Side Pilots and Vapors from Condensate Tanks and Dehydrator (Units FL1, FL2,

Changed by TV*	NSR Condition #	TV Section #
	and Dehydrator (Units FL1, FL2, FL3)	FL3)
	A207 Sulfur Recovery Unit– Not Required	A207 Sulfur Recovery Unit– Not Required
	A208 Amine Unit– Not Required	A208 Amine Unit– Not Required
	A209 Fugitives	A209 Fugitives
	A209.A 40 CFR 60, Subpart OOOOa – (Reciprocating Compressors associated with Units ENG1-9, ENG11-12)	A209.A 40 CFR 60, Subpart OOOOa – (Reciprocating Compressors associated with Units ENG1-9, ENG11-12)
	A209.B 40 CFR 60, Subpart OOOOa – Fugitives (Unit FUG)	A209.B 40 CFR 60, Subpart OOOOa – Fugitives (Unit FUG)
XX	(before effective date of Part 50)	A209.C Part 50 equipment leaks/fugitive condition
XX	(before effective date of Part 50)	A209.D Part 50 pneumatic controller condition
XX	(before effective date of Part 50)	A209.E pig launcher condition
		A300 Construction Industry – Aggregate – Not Required
		A400 Construction Industry – Asphalt – Not Required
		A500 Construction Industry - Concrete – Not Required
		A600 Power Generation Industry – Not Required
		A700 Solid Waste Disposal (Landfills) Industry – Not Required
	Part B General Conditions	Part B General Conditions
	Part C Miscellaneous	Part C Miscellaneous

NSR conditions identified as "NSR Unique" do not establish any applicable requirements or federally enforceable conditions that require adoption in the TV operating permits.

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

A. The dehy flash emissions are routed back to process. Routing emissions back to process does not meet the 40 CFR 64 definition of control device, therefore, the dehydrators emissions (units DEHY1-3) are not subject to CAM.
B. As of August 5, 2022, the facility is subject to 20.2.50 NMAC.