

**NMED AIR QUALITY
TITLE V MINOR MODIFICATION
ETC TEXAS PIPELINE LTD
JAL #3 GAS PLANT**

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FEB 17 2023

Air Quality Bureau

Prepared By:

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February 2023

Project 233201.0015



9400 Holly Ave NE, Bldg 3, Ste B, Albuquerque, NM 87122 / P 505.266.6611 / trinityconsultants.com

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FEB 17 2023

Air Quality Bureau

February 1, 2023

Permit Programs Manager
NMED Air Quality Bureau
525 Camino de los Marquez Suite 1
Santa Fe, NM 87505-1816

*Title V Permit – Minor Modification
ETC Texas Pipeline LTD: Jal #3 Gas Plant*

Permit Programs Manager:

ETC Texas Pipeline LTD (ETC) is submitting a minor modification application to correct the Compliance Assurance Monitoring (CAM) plan for the Acid Gas Injection (AGI) well at the Jal #3 Gas Plant. The facility is currently permitted under Operating Permit P090-R3 and Construction Permit 1092-M8R4. The facility is located approximately 4 miles north-northeast of Jal in Lea County, New Mexico. This modification application seeks to correct the CAM plan only; no changes to emission limits or other permit condition is proposed.

The format and content of this application are consistent with the guidance provided by the Air Quality Bureau; it is a complete application package using the most current application form. Enclosed is a hard copy of the application, including the original certification, and the application in electronic format. Please feel free to contact either myself at (505) 266-6611 or by email at aerenstein@trinityconsultants.com if you have any questions regarding this application. Alternatively, you may contact Alena Miro, Environmental Manager for ETC, at (575) 810-8764 or by email at alena.miro@energytransfer.com.

Sincerely,

Adam Erenstein
Manager of Consulting Services

Cc: Alena Miro (Energy Transfer)
Trinity Project File 233201.0015

HEADQUARTERS

12700 Park Central Dr, Ste 2100, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203

| | | |
|--|--|--|
| Mail Application To: 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 |  | For Department use only: <div style="font-size: 2em; color: blue; font-weight: bold;">RECEIVED</div> <div style="color: red; font-weight: bold;">FEB 17 2023</div> <div style="color: blue; font-weight: bold;">Air Quality Bureau</div> |
|--|--|--|

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.

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.
☐ I acknowledge there is an annual fee for permits in addition to the permit review fee: www.env.nm.gov/air-quality/permit-fees-2/.
☐ This facility qualifies for the small business fee reduction per 20.2.75.11.C. NMAC. The full \$500.00 filing fee is included with this application and I understand the fee reduction will be calculated in the balance due invoice. The Small Business Certification Form has been previously submitted or is included with this application. (Small Business Environmental Assistance Program Information: www.env.nm.gov/air-quality/small-biz-eap-2/.)

Citation: Please provide the **low level citation** under which this application is being submitted: **20.2.70.B.(1) 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

| | | | |
|---|--|--|--------------------------------|
| Section 1-A: Company Information | | AI # 569: | Updating Permit/NOI #: P090-R3 |
| | | Plant primary SIC Code (4 digits): 1321 Plant NAIC code (6 digits): | |
| 1 | Facility Name: Jal #3 Gas Plant | | |
| a | Facility Street Address (If no facility street address, provide directions from a prominent landmark): 672,129 m E by 3,561,167 m N; Zone 13, Datum WGS84 | | |
| 2 | Plant Operator Company Name: ETC Texas Pipeline LTD | Phone/Fax: 214-840-5483 | |
| a | Plant Operator Address: 8111 Westchester Drive Suite 600, Dallas, TX 75225 | | |
| b | Plant Operator's New Mexico Corporate ID or Tax ID: | | |

| | | |
|---|---|--|
| 3 | Plant Owner(s) name(s): ETC Texas Pipeline LTD | Phone/Fax: 214-840-5483 |
| a | Plant Owner(s) Mailing Address(s): 8111 Westchester Drive Suite 600, Dallas, TX 75225 | |
| 4 | Bill To (Company): ETC Texas Pipeline LTD | Phone/Fax: 214-840-5483 |
| a | Mailing Address: 8111 Westchester Drive Suite 600, Dallas, TX 75225 | E-mail: alena.miro@energytransfer.com |
| 5 | <input type="checkbox"/> Preparer: Adam Erenstein <input type="checkbox"/> Consultant: Trinity Consultants, Inc. | Phone/Fax: 505-266-6611 |
| a | Mailing Address: 9400 Holly Avenue, Building 3, Suite 300, Albuquerque, NM 87122 | E-mail: aerenstein@trinityconsultants.com |
| 6 | Plant Operator Contact: Alena Miro | Phone/Fax: 575-810-8674 |
| a | Address: 2564 Pecos Highway, Carlsbad, NM 88220 | E-mail: alena.miro@energytransfer.com |
| 7 | Air Permit Contact: Alena Miro | Title: Environmental Manager |
| a | E-mail: alena.miro@energytransfer.com | Phone/Fax: 575-810-8674 |
| b | Mailing Address: 2564 Pecos Highway, Carlsbad, NM 88220 | |
| 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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 1.b If yes to question 1.a, is it currently operating in New Mexico? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3 | Is the facility currently shut down? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If yes, give month and year of shut down (MM/YY): N/A |
| 4 | Was this facility constructed before 8/31/1972 and continuously operated since 1972? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A | |
| 6 | Does this facility have a Title V operating permit (20.2.70 NMAC)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | If yes, the permit No. is: P-090-R3 |
| 7 | Has this facility been issued a No Permit Required (NPR)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If yes, the NPR No. is: N/A |
| 8 | Has this facility been issued a Notice of Intent (NOI)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If yes, the NOI No. is: N/A |
| 9 | Does this facility have a construction permit (20.2.72/20.2.74 NMAC)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | If yes, the permit No. is: 1092-M8R4 |
| 10 | Is this facility registered under a General permit (GCP-1, GCP-2, etc.)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | If yes, the register No. is: N/A |

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: 6.25 MMscf | Daily: 150 MMscf | Annually: 54,750 MMscf |
| b | Proposed | Hourly: 6.25 MMscf | Daily: 150 MMscf | Annually: 54,750 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: 6.25 MMscf | Daily: 150 MMscf | Annually: 54,750 MMscf |
| b | Proposed | Hourly: 6.25 MMscf | Daily: 150 MMscf | Annually: 54,750 MMscf |

Section 1-D: Facility Location Information

| | | | | | |
|----|---|------------|---------------|---|----------------------|
| 1 | Section: 33 | Range: 37E | Township: 24S | County: Lea | Elevation (ft): 3264 |
| 2 | UTM Zone: <input type="checkbox"/> 12 or <input checked="" type="checkbox"/> 13S | | | Datum: <input type="checkbox"/> NAD 27 <input type="checkbox"/> NAD 83 <input checked="" type="checkbox"/> WGS 84 | |
| a | UTM E (in meters, to nearest 10 meters): 672,129 | | | UTM N (in meters, to nearest 10 meters): 3,561,167 | |
| b | AND Latitude (deg., min., sec.): 32.17361 | | | Longitude (deg., min., sec.): -103.174 | |
| 3 | Name and zip code of nearest New Mexico town: Jal, 88252 | | | | |
| 4 | Detailed Driving Instructions from nearest NM town (attach a road map if necessary): Travel north on NM18 from Jal for ~ 4 miles to Lea County Road13. Travel east on CR13 for ~ 1 mile. The Jal #3 Gas Plant is on the left, north of CR13. | | | | |
| 5 | The facility is 4 miles NNE of Jal. | | | | |
| 6 | Status of land at facility (check one): <input type="checkbox"/> Private <input type="checkbox"/> Indian/Pueblo <input type="checkbox"/> Federal BLM <input type="checkbox"/> Federal Forest Service <input type="checkbox"/> 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: Municipalities: Jal, Bennett, NM; Counties: Lea County, NM; Indian tribes: None. | | | | |
| 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/air-quality/modeling-publications/)? <input type="checkbox"/> Yes <input type="checkbox"/> No (20.2.72.206.A.7 NMAC) If yes, list all with corresponding distances in kilometers: N/A | | | | |
| 9 | Name nearest Class I area: Carlsbad Caverns National Park | | | | |
| 10 | Shortest distance (in km) from facility boundary to the boundary of the nearest Class I area (to the nearest 10 meters): 112.600 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: 2,030 m | | | | |
| 12 | Method(s) used to delineate the Restricted Area: Continuous fence "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? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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? <input checked="" type="checkbox"/> No <input type="checkbox"/> 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 | ($\frac{\text{hours}}{\text{year}}$): 8760 |
| 2 | Facility's maximum daily operating schedule (if less than 24 $\frac{\text{hours}}{\text{day}}$)? Start: N/A | | <input type="checkbox"/> AM <input type="checkbox"/> PM | End: <input type="checkbox"/> AM <input type="checkbox"/> PM |
| 3 | Month and year of anticipated start of construction: N/A | | | |
| 4 | Month and year of anticipated construction completion: N/A | | | |
| 5 | Month and year of anticipated startup of new or modified facility: N/A | | | |
| 6 | Will this facility operate at this site for more than one year? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> 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? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If yes, specify: This plant as no Active Matters in the Enforcement Watch database. |
|---|--|

| | | | |
|---|--|-----------|--|
| a | If yes, NOV date or description of issue: N/A | | NOV Tracking No: N/A |
| b | Is this application in response to any issue listed in 1-F, 1 or 1a above? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, provide the 1c & 1d info below: | | |
| c | Document Title: N/A | Date: N/A | Requirement # (or page # and paragraph #): N/A |
| d | Provide the required text to be inserted in this permit: N/A | | |
| 2 | Is air quality dispersion modeling or modeling waiver being submitted with this application? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |
| 4 | Will this facility be a source of federal Hazardous Air Pollutants (HAP)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | |
| a | If Yes, what type of source? <input checked="" type="checkbox"/> Major (<input checked="" type="checkbox"/> ≥ 10 tpy of any single HAP AND <input checked="" type="checkbox"/> ≥ 25 tpy of any combination of HAPS) OR <input type="checkbox"/> Minor (<input type="checkbox"/> < 10 tpy of any single HAP AND <input type="checkbox"/> < 25 tpy of any combination of HAPS) | | |
| 5 | Is any unit exempt under 20.2.72.202.B.3 NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | |
| a | If yes, include the name of company providing commercial electric power to the facility: N/A 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 | <input type="checkbox"/> I have filled out Section 18, "Addendum for Streamline Applications." <input checked="" type="checkbox"/> 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.) Toby Clark (20.2.70.300.D.2 NMAC): | | Phone: 432-614-9387 |
| a | R.O. Title: Vice-President, Operations | R.O. e-mail: Toby.Clark@energytransfer.com | |
| b | R. O. Address: 600 N Marienfield Street, Suite 700, Midland, TX 79701 | | |
| 2 | Alternate Responsible Official N/A (20.2.70.300.D.2 NMAC): | | Phone: N/A |
| a | A. R.O. Title: N/A | A. R.O. e-mail: N/A | |
| b | A. R. O. Address: N/A | | |
| 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): Energy Transfer Company 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.): Energy Transfer Equity, L.P. | | |
| a | Address of Parent Company: 800 Sonterra Blvd., Suite 400, San Antonio, Texas, 78258 | | |
| 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.): None | | |
| 6 | Telephone numbers & names of the owners' agents and site contacts familiar with plant operations: Alena Miro, 575-810-8674 | | |
| 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: Yes, Texas, 10.36 km. | | |

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-toe 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. Electronic files for applications for NOIs, any type of General Construction Permit (GCP), or technical revisions to NSRs must be submitted with compact disk (CD) or digital versatile disc (DVD). For these permit application submittals, **two CD** copies are required (in sleeves, not crystal cases, please), with additional CD copies as specified below. NOI applications require only a **single CD** submittal. Electronic files for other New Source Review (construction) permits/permit modifications or Title V permits/permit modifications can be submitted on CD/DVD or sent through AQB’s secure file transfer service.

Electronic files sent by (check one):

☐ CD/DVD attached to paper application

☒ secure electronic transfer. Air Permit Contact Name Alena Mio, Email: alena.miro@energytransfer.com Phone number _____.

a. If the file transfer service is chosen by the applicant, after receipt of the application, the Bureau will email the applicant with instructions for submitting the electronic files through a secure file transfer service. Submission of the electronic files through the file transfer service needs to be completed within 3 business days after the invitation is received, so the applicant should ensure that the files are ready when sending the hard copy of the application. The applicant will not need a password to complete the transfer. **Do not use the file transfer service for NOIs, any type of GCP, or technical revisions to NSR permits.**

- 4) Optionally, the applicant may submit the files with the application on compact disk (CD) or digital versatile disc (DVD) following the instructions above and the instructions in 5 for applications subject to PSD review.
- 5) 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.
- 6) 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 as 2 separate CDs or submitted through the AQB secure file transfer service. 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:

that calculated the emissions.

- 3) It is preferred that this application form be submitted as 4 electronic files (3 MS Word docs: Universal Application section 1 [UA1], Universal Application section 3-19 [UA3], and Universal Application 4, the modeling report [UA4]) and 1 Excel file of the tables (Universal Application section 2 [UA2]). 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 number (0 for original, 1, 2, etc.; which will help keep track of subsequent partial update(s) to the original submittal. Do not use special symbols (#, @, etc.) in file names. The footer information should not be modified by the applicant.

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Change Log – Do **not** submit this page with your application.

If you are using a form older than the most current form posted on the website, you are required to incorporate the changes listed. Periodically, AQB will announce when older form versions will no longer be accepted.

| Version Date | Changes Incorporated |
|--------------|--|
| 4/1/2021 | Current version of this form. Older versions are not accepted. |
| | |

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.

ETC Texas Pipeline, Ltd. (ETC) operates the Jal No. 3 Gas Plant in Lea County. In this application ETC seeks to correct a typographical error in the current Compliance Assurance Monitoring (CAM) plan for the Acid Gas Injection (AGI) well operated at the plant. The CAM plan is shown on page A34, Table A-3 of the current Title V Operating Permit P090-R3.

The current CAM plan shows the low indicator range for Indicator No. 1, Wellhead Pressure, as 700 pounds per square inch, gauge (psig). In practice, successful injection can be achieved with a low-end of the indicator range that is much lower. ETC seeks to replace the incorrect the lower end of the indicator range with the correct value of 1 psig.

As required by the CAM plan, ETC monitors and records the AGI wellhead pressure daily when the AGI is operating. These records are available to the NMED on request. Pressure monitoring records for the AGI compressor discharge pressure are also available on request and demonstrate that discharge pressure is always greater than the wellhead pressure.

A red-line of the CAM plan correction is included with this application.

ETC has determined that this modification qualifies as minor modification to Title V Permit P090-R3 pursuant to 20.2.70.B(1)(a) through (f) as this modification

- (a) Does not violate any applicable requirement;
- (b) Does not involve relaxation of existing monitoring, reporting, or recordkeeping requirements in the permit;
- (c) Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
- (d) Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the permittee has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions cap assumed to avoid classification as a title I modification and any alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Act;
- (e) Is not title I modifications; and
- (f) Is not required by the Department to be processed as a significant modification pursuant to subsection C of 20.2.70.404 NMAC.

Per guidance provided by the NMED Air Quality Bureau on December 221, 2022, this application includes only the applicable UA1 sections, Section 3 and then CAM updates and certification page.

TABLE A-3. JAL #3 GAS PLANT - CAM APPROACH - AGI

| | Indicator No. 1 | Indicator No. 2 | Other Monitoring and Verification |
|---------------------------------|--|--|--|
| I. AGI Performance Indicator | Wellhead pressure (psig). | Duct integrity | NA |
| II. Indicator Range * | Low 1 psig Low 700 psig High 1700 psig | No visible or readily detectable leaks, gaps, or failures in piping. | Permittee will investigate any excursion of indicators 1 & 2 and perform corrective action, logging, and reporting in semiannual report. |
| III. Performance Criteria | | | |
| A. Data Representativeness | Pressure is measured by a pressure transducer or gauge. | Piping is inspected visually and by any other appropriate means | NA |
| B. QA/QC Practices and Criteria | 1) Pressure transducer or gauge is verified annually. 2) Proper operation of the transducer is verified annually. 3) AGI motor and compressor are maintained according to manufacturer's specifications. | Instrumentation, if any, calibrated in accordance with good practice | NA |
| C. Monitoring Frequency | Wellhead pressure is monitored once per day. | Piping is inspected daily | |
| D. Data Collection Procedures | 1) Wellhead pressure recorded daily. No observation required for days when AGI is not operated. 2) Verification of gauge or transducer recorded. 3) Maintenance of AGI motor and compressor recorded. | Written record of inspection and of any repairs needed. | Record any AGI shutdowns. |
| E. Averaging Period | None, not to exceed ranges. | NA | NA |

* Ranges may need to be revised in the future.

TABLE A-3. JAL #3 GAS PLANT - CAM APPROACH - AGI

| | Indicator No. 1 | Indicator No. 2 | Other Monitoring and Verification |
|---------------------------------|--|--|--|
| I. AGI Performance Indicator | Wellhead pressure (psig). | Duct integrity | NA |
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| III. Performance Criteria | | | |
| A. Data Representativeness | Pressure is measured by a pressure transducer or gauge. | Piping is inspected visually and by any other appropriate means | NA |
| B. QA/QC Practices and Criteria | 1) Pressure transducer or gauge is verified annually. 2) Proper operation of the transducer is verified annually. 3) AGI motor and compressor are maintained according to manufacturer's specifications. | Instrumentation, if any, calibrated in accordance with good practice | NA |
| C. Monitoring Frequency | Wellhead pressure is monitored once per day. | Piping is inspected daily | |
| D. Data Collection Procedures | 1) Wellhead pressure recorded daily. No observation required for days when AGI is not operated. 2) Verification of gauge or transducer recorded. 3) Maintenance of AGI motor and compressor recorded. | Written record of inspection and of any repairs needed. | Record any AGI shutdowns. |
| E. Averaging Period | None, not to exceed ranges. | NA | NA |

* Ranges may need to be revised in the future.

Section 22: Certification

Company Name: ETC Texas Pipeline Ltd

I, Mike Mc Cracken, 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 14TH day of FEBRUARY, 2023 upon my oath or affirmation, before a notary of the State of

NEW MEXICO

[Signature]
*Signature

02/14/2023
Date

Mike Mc Cracken
Printed Name

Senior Director, Operations
Title

Scribed and sworn before me on this 14th day of February, 2023.

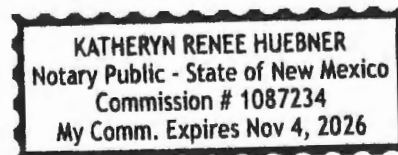
My authorization as a notary of the State of NEW MEXICO CHANDLER COUNTY expires on the

4th day of November, 2026.

[Signature]
Notary's Signature

2/14/2023
Date

Kathryn Renee Huebner
Notary's Printed Name



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