

# NMED AIR QUALITY PERMIT NSR SIGNIFICANT REVISION APPLICATION

**HILCORP ENERGY COMPANY**  
**San Juan Gas Plant**



**Prepared By:**

Michael Celente – Managing Consultant

**TRINITY CONSULTANTS**

9400 Holly Ave NE  
Bldg 3, Suite B  
Albuquerque, NM 87122  
(505) 266-6611

January 2024

Project 233201.0150



**TRINITY CONSULTANTS, INC.**

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OF

Five Hundred and 00/100 Dollars

New Mexico Environmental Department

Air Quality Bureau

525 Camino de los Marquez

Suite 1

Santa Fe, NM 87505-1816

AMOUNT 500.00

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AUTHORIZED SIGNATURE

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| 122332010150NSR                     | 9/13/2023 | 0157213  | 500.00 |           |              | 500.00     |
| New Mexico Environmental Department |           | TOTAL    | 500.00 |           |              | 500.00     |
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9400 Holly Ave NE, Bldg 3, Ste B, Albuquerque, NM 87122 / P 505.266.6611 / [trinityconsultants.com](http://trinityconsultants.com)

January 12, 2024

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

*RE: NSR Significant Revision Application  
Hilcorp Energy Company – San Juan Gas Plant*

Permit Programs Manager:

On the behalf of Hilcorp Energy Company, we are submitting an NSR Significant Revision application for the San Juan Gas Plant. The facility is currently authorized under NSR 0613-M13 and is located approximately 0.9 miles northeast of Bloomfield, New Mexico. The proposed modification includes replacing two (2) natural gas-fired turbines (Unit 4 & 5).

The format and content of this application are consistent with the Bureau's current policy regarding NSR Significant Revision applications; it is a complete application package using the most current Universal Application forms. Enclosed is a hard copy of the application, including the original certification. Please feel free to contact either myself at (505) 266-6611 or by email at [mcelente@trinityconsultants.com](mailto:mcelente@trinityconsultants.com) if you have any questions regarding this application. Alternatively, you may contact Clara Cardoza, Environmental Compliance for Hilcorp Energy Company, at (505) 564-0733 or by email at [ccardoza@hilcorp.com](mailto:ccardoza@hilcorp.com).

Sincerely,

Michael Celente  
Managing Consultant

CC: Clara Cardoza (Environmental Compliance, [ccardoza@hilcorp.com](mailto:ccardoza@hilcorp.com))

Trinity Project File: 233201.0150

## HEADQUARTERS

12700 Park Central Dr, Ste 600, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203

|  |   |                                 |
|--|---|---------------------------------|
| <b>Mail Application To:</b><br><br>New Mexico Environment Department<br>Air Quality Bureau<br>Permits Section<br>525 Camino de los Marquez, Suite 1<br>Santa Fe, New Mexico, 87505<br><br>Phone: (505) 476-4300<br>Fax: (505) 476-4375<br><a href="http://www.env.nm.gov/aqb">www.env.nm.gov/aqb</a> |  | <b>For Department use only:</b> |
|--|---|---------------------------------|

## 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:** ☐ 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.: **656951** in the amount of \$500
- ☒ 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/](http://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/](http://www.env.nm.gov/air-quality/small-biz-eap-2/).)

**Citation:** Please provide the **low level citation** under which this application is being submitted: **20.2.72.219.D(2) NMAC** (e.g. application for a new minor source would be 20.2.72.200.A NMAC, one example for a Technical Permit Revision is 20.2.72.219.B.1.b NMAC, a Title V acid rain application would be: 20.2.70.200.C NMAC)

## Section 1 – Facility Information

### Section 1-A: Company Information

|   |  |   |                                 |
|---|--|---|---------------------------------|
|   |  | AI # if known: 1177                     | Updating Permit/NOI #: 0613-M13 |
| 1 | Facility Name:<br>San Juan Gas Plant   | Plant primary SIC Code (4 digits): 1321 |                                 |
|   |  | Plant NAIC code (6 digits): 211112      |                                 |
| a | Facility Street Address (If no facility street address, provide directions from a prominent landmark):<br>1001 Arizona, Bloomfield, NM 87413 |   |                                 |
| 2 | Plant Operator Company Name: Hilcorp Energy Company  | Phone/Fax: (713) 209-2400/ N/A          |                                 |
| a | Plant Operator Address: 1111 Travis Street, Houston, TX 77002  |   |                                 |

|   |   |  |  |
|---|---|--|--|
| b | Plant Operator's New Mexico Corporate ID or Tax ID: 81-3974956  |  |  |
| 3 | Plant Owner(s) name(s): Hilcorp Energy Company  | Phone/Fax: (713) 209-2400/ N/A   |  |
| a | Plant Owner(s) Mailing Address(s): 1111 Travis Street, Houston, TX 77002  |  |  |
| 4 | Bill To (Company): Hilcorp Energy Company   | Phone/Fax: (713) 209-2400/ N/A   |  |
| a | Mailing Address: 1111 Travis Street, Houston, TX 77002  | E-mail: <a href="mailto:rbeard@hilcorp.com">rbeard@hilcorp.com</a>                           |  |
| 5 | <input checked="" type="checkbox"/> Preparer: Michael Celente<br><input checked="" type="checkbox"/> Consultant: Trinity Consultants Inc. | Phone/Fax: (505) 266-6611 / N/A  |  |
| a | Mailing Address: 9400 Holly Ave NE, Bldg. 3, Ste B, Albuquerque, NM 87122   | E-mail: <a href="mailto:MCelente@trinityconsultants.com">MCelente@trinityconsultants.com</a> |  |
| 6 | Plant Operator Contact: Kevin Reese   | Phone/Fax: 505-632-4907/N/A  |  |
| a | Address: 1001 Arizona, Bloomfield NM 87413  | E-mail: <a href="mailto:kreese@hilcorp.com">kreese@hilcorp.com</a>                           |  |
| 7 | Air Permit Contact: Clara Cardoza   | Title: Environmental Compliance L48W   |  |
| a | E-mail: <a href="mailto:ccardoza@hilcorp.com">ccardoza@hilcorp.com</a>  | Phone/Fax: (505) 564-0733/ N/A   |  |
| b | Mailing Address: 382 CR 3100, Aztec NM 87410  |  |  |
| 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?<br><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?<br><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)?<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No   | If yes, the permit No. is: P-124-R4   |
| 7   | Has this facility been issued a No Permit Required (NPR)?<br><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)?<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No  | If yes, the permit No. is: 0613-M13   |
| 10  | Is this facility registered under a General permit (GCP-1, GCP-2, etc.)?<br><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: 25 MMSCF | Daily: 600 MMSCF | Annually: 219 BSCF |
| b | Proposed   | Hourly: 25 MMSCF | Daily: 600 MMSCF | Annually: 219 BSCF |
| 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: 25 MMSCF | Daily: 600 MMSCF | Annually: 219 BSCF |
| b | Proposed   | Hourly: 25 MMSCF | Daily: 600 MMSCF | Annually: 219 BSCF |

**Section 1-D: Facility Location Information**

|    |  |  |   |                          |
|----|--|--|---|--------------------------|
| 1  | Latitude (decimal degrees): 36.73251°  | Longitude (decimal degrees): -107.96701° | County:<br>San Juan   | Elevation (ft):<br>5,600 |
| 2  | UTM Zone: <input type="checkbox"/> 12 or <input checked="" type="checkbox"/> 13  |  | Datum: <input type="checkbox"/> NAD 83 <input checked="" type="checkbox"/> WGS 84 |                          |
| a  | UTM E (in meters, to nearest 10 meters): 235,114 m   |  | UTM N (in meters, to nearest 10 meters): 4,069,292 m                              |                          |
| 3  | Name and zip code of nearest New Mexico town: Bloomfield, 87413  |  |   |                          |
| 4  | Detailed Driving Instructions from nearest NM town (attach a road map if necessary): From E. Broadway Ave (Hwy 64) and N. 1st Street (Hwy 550) in Bloomfield, travel north for approx. 1.4 miles and turn right (east) on Arizona. Travel east for approx. 0.5 miles. Facility is on right.  |  |   |                          |
| 5  | The facility is 0.9 miles northeast of Bloomfield, NM 87413  |  |   |                          |
| 6  | Land Status of facility (check one): <input checked="" type="checkbox"/> Private <input type="checkbox"/> Indian/Pueblo <input type="checkbox"/> Government <input type="checkbox"/> BLM <input type="checkbox"/> Forest Service <input type="checkbox"/> Military   |  |   |                          |
| 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 – Bloomfield, Aztec, Farmington; Indian tribe – Navajo Nation; County – San Juan County;   |  |   |                          |
| 8  | 20.2.72 NMAC applications <b>only</b> : 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 <a href="http://www.env.nm.gov/air-quality/modeling-publications/">www.env.nm.gov/air-quality/modeling-publications/</a> )? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (20.2.72.206.A.7 NMAC) If yes, list all with corresponding distances in kilometers: Colorado, 31 km.  |  |   |                          |
| 9  | Name nearest Class I area: Mesa Verde National Park  |  |   |                          |
| 10 | Shortest distance (in km) from facility boundary to the boundary of the nearest Class I area (to the nearest 10 meters): 63.3 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: 42.6 m  |  |   |                          |
| 12 | Method(s) used to delineate the Restricted Area: Continuous fencing<br><br>"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?<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No<br>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<br>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 <b>maximum</b> 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: N/A <input checked="" type="checkbox"/> AM <input checked="" type="checkbox"/> PM |
| 3 | Month and year of anticipated start of construction: Upon receipt of the modified permit.   |  |   |  |
| 4 | Month and year of anticipated construction completion: Upon receipt of the modified permit.   |  |   |  |
| 5 | Month and year of anticipated startup of new or modified facility: Upon receipt of the modified permit.                             |  |   |  |
| 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:  |                      |  |
| 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 checked="" type="checkbox"/> No<br>If Yes, provide the 1c & 1d info below: N/A  |                      |  |
| 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 checked="" type="checkbox"/> Yes <input 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 type="checkbox"/> Major ( <input type="checkbox"/> ≥10 tpy of any single HAP OR <input type="checkbox"/> ≥25 tpy of any combination of HAPS)<br>OR <input checked="" type="checkbox"/> Minor ( <input checked="" type="checkbox"/> <10 tpy of any single HAP AND <input checked="" 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<br><br>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.)<br>(20.2.70.300.D.2 NMAC): Matt Henderson  |   | Phone: 713-289-2970 |
| a | R.O. Title: Environmental Manager - L48W   | R.O. e-mail: <a href="mailto:mhenderson@hilcorp.com">mhenderson@hilcorp.com</a> |                     |
| b | R. O. Address: 1111 Travis Street, Houston, TX 77002   |   |                     |
| 2 | Alternate Responsible Official<br>(20.2.70.300.D.2 NMAC): Kevin Reese  |   | Phone: 505-632-4907 |
| a | A. R.O. Title: Plant Manager   | A. R.O. e-mail: <a href="mailto:kreese@hilcorp.com">kreese@hilcorp.com</a>      |                     |
| b | A. R. O. Address: 1001 Arizona, Bloomfield NM 87413  |   |                     |
| 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): N/A |   |                     |
| 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.): Hilcorp Energy Company  |   |                     |
| a | Address of Parent Company: 1111 Travis Street, Houston, TX 77002   |   |                     |
| 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.): N/A  |   |                     |
| 6 | Telephone numbers & names of the owners' agents and site contacts familiar with plant operations:<br>Kevin Reese, 505-632-4907<br>Clara Cardoza, 505-564-0733  |   |                     |

|   |  |
|---|--|
| 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:<br>Colorado, 31 km; Southern Ute Indian Tribe, 31 km; Ute Mountain Indian Reservation, 32.2 km; Navajo Nation, 32.2 km; Jicarilla Apache Reservation, 48.3 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-to 2-hole punched copy required in 1) above. Minor NSR Technical Permit revisions (20.2.72.219.B NMAC) only need to fill out Sections 1-A, 1-B, 3, and should fill out those portions of other Section(s) relevant to the technical permit revision. TV Minor Modifications need only fill out Sections 1-A, 1-B, 1-H, 3, and those portions of other Section(s) relevant to the minor modification. NMED may require additional portions of the application to be submitted, as needed.
- 3) The entire NOI or Permit application package, including the full modeling study, should be submitted electronically. 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: Michael Celente Email: [MCelente@trinityconsultants.com](mailto:MCelente@trinityconsultants.com); Phone number (505) 266-6611

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: i.e. brochures, maps, graphics, etc.), submit these items in hard copy format. We must be able to review the formulas and inputs that calculated the emissions.
- 3) It is preferred that this application form be submitted as 4 electronic files (**3 MSWord docs**: Universal Application section 1 [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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**Table 2-A: Regulated Emission Sources**

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

| Unit Number <sup>1</sup> | Source Description           | Make                   | Model #   | Serial # | Manufact-<br>urer's Rated<br>Capacity <sup>3</sup><br>(Specify Units) | Requested<br>Permitted<br>Capacity <sup>3</sup><br>(Specify Units) | Date of<br>Manufacture <sup>2</sup>                     | Controlled<br>by Unit #           | Source Classi-<br>fication Code<br>(SCC) | For Each Piece of Equipment, Check One  | RICE Ignition<br>Type (CI, SI,<br>4SLB, 4SRB,<br>2SLB) <sup>4</sup> | Replacing<br>Unit No. |
|--------------------------|------------------------------|------------------------|-----------|----------|---|--|---|-----------------------------------|--|---|---|-----------------------|
|                          |                              |                        |           |          |   |  | Date of<br>Construction/<br>Reconstruction <sup>2</sup> | Emissions<br>vented to<br>Stack # |  |   |   |                       |
| 1                        | Natural Gas Fired<br>Turbine | Rolls Royce            | Avon 1535 | C-101*   | 23,800 hp   | 15,000 hp  | 1986  | 1                                 | 20200201                                 | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced | N/A   | N/A                   |
|                          |                              |                        |           |          |   |  | 1986  | 1                                 |  |   |   |                       |
| 2                        | Natural Gas Fired<br>Turbine | Rolls Royce            | Avon 1535 | C-201*   | 23,800 hp   | 15,000 hp  | 1986  | 2                                 | 20200201                                 | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced | N/A   | N/A                   |
|                          |                              |                        |           |          |   |  | 1986  | 2                                 |  |   |   |                       |
| 3                        | Natural Gas Fired<br>Turbine | Rolls Royce            | Avon 1535 | C-301*   | 23,800 hp   | 15,000 hp  | 1986  | 3                                 | 20200201                                 | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced | N/A   | N/A                   |
|                          |                              |                        |           |          |   |  | 1986  | 3                                 |  |   |   |                       |
| 4                        | Natural Gas Fired<br>Turbine | Solar Centaur          | T4501     | G-1300A  | 4,500 hp  | 3,735 hp   | 1986  | N/A                               | 20200201                                 | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced | N/A   | N/A                   |
|                          |                              |                        |           |          |   |  | 1986  | 4                                 |  |   |   |                       |
| 5                        | Natural Gas Fired<br>Turbine | Solar Centaur          | T4501     | G-1300B  | 4,500 hp  | 3,735 hp   | 1986  | N/A                               | 20200201                                 | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced | N/A   | N/A                   |
|                          |                              |                        |           |          |   |  | 1986  | 5                                 |  |   |   |                       |
| 6                        | Natural Gas Fired<br>Turbine | Solar Centaur          | T4501     | G-1300C  | 4,500 hp  | 3,735 hp   | 1986  | N/A                               | 20200201                                 | <input type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input checked="" type="checkbox"/> To be Replaced | N/A   | N/A                   |
|                          |                              |                        |           |          |   |  | 1986  | 6                                 |  |   |   |                       |
| 7                        | Natural Gas Fired<br>Turbine | Solar Centaur          | T4501     | G-1300D  | 4,500 hp  | 3,735 hp   | 1986  | N/A                               | 20200201                                 | <input type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input checked="" type="checkbox"/> To be Replaced | N/A   | N/A                   |
|                          |                              |                        |           |          |   |  | 1986  | 7                                 |  |   |   |                       |
| 8                        | Regeneration Heater          | WILLBROS<br>Downstream | N/A       | 621-014  | 14.55<br>MMBtu/hr   | 14.55<br>MMBtu/hr  | 2011  | N/A                               | 30600105                                 | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced | N/A   | N/A                   |
|                          |                              |                        |           |          |   |  | 2012  | 8                                 |  |   |   |                       |
| 9                        | Safety System Flare          | John Zink              | N/A       | N/A      | 600 mmscfd  | 600 mmscfd   | 1986  | N/A                               | 30600903                                 | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced | N/A   | N/A                   |
|                          |                              |                        |           |          |   |  | 1986  | 9                                 |  |   |   |                       |
| 10                       | Diesel Generator             | Caterpillar            | G3412     | 81Z05003 | 755 hp  | 469 hp   | 1986  | N/A                               | 20200401                                 | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced | CI  | N/A                   |
|                          |                              |                        |           |          |   |  | 1986  | 10                                |  |   |   |                       |
| 11                       | Firewater Pump               | Caterpillar            | G3406     | 6TB03248 | 343 hp  | 343 hp   | 1986  | N/A                               | 20200401                                 | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced | CI  | N/A                   |
|                          |                              |                        |           |          |   |  | 1986  | 11                                |  |   |   |                       |
| 12                       | Regeneration Heater          | Broach                 | N/A       | H-901    | 3.4<br>MMBtu/hr   | 3.4<br>MMBtu/hr  | 1986  | N/A                               | 30600105                                 | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced | N/A   | N/A                   |
|                          |                              |                        |           |          |   |  | 1986  | 12                                |  |   |   |                       |
| 13                       | Regeneration Heater          | WILLBROS<br>Downstream | N/A       | 621-011  | 14.55<br>MMBtu/hr   | 14.55<br>MMBtu/hr  | 2011  | N/A                               | 30600105                                 | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced | N/A   | N/A                   |
|                          |                              |                        |           |          |   |  | 2011  | 13                                |  |   |   |                       |
| 14                       | Fugitive Emissions           | N/A                    | N/A       | N/A      | N/A   | N/A  | 1986  | N/A                               | 3688801                                  | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced | N/A   | N/A                   |
|                          |                              |                        |           |          |   |  | 1986  | 14                                |  |   |   |                       |

| Unit Number <sup>1</sup> | Source Description               | Make          | Model #   | Serial # | Manufact-urer's Rated Capacity <sup>3</sup><br>(Specify Units) | Requested Permitted Capacity <sup>3</sup><br>(Specify Units) | Date of Manufacture <sup>2</sup>                     | Controlled by Unit #        | Source Classi-fication Code (SCC) | For Each Piece of Equipment, Check One   | RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB) <sup>4</sup>  | Replacing Unit No. |     |
|--------------------------|----------------------------------|---------------|-----------|----------|--|--|--|-----------------------------|-----------------------------------|--|---|--------------------|-----|
|                          |                                  |               |           |          |  |  | Date of Construction/<br>Reconstruction <sup>2</sup> | Emissions vented to Stack # |                                   |  |   |                    |     |
| 15                       | Thermal Oxidizer                 | Callidus      | N/A       | N/A      | 12 MMBtu/hr  | 12 MMBtu/hr  | 1986   | N/A                         | 30600903                          | <input checked="" type="checkbox"/> Existing (unchanged)<br><input type="checkbox"/> New/Additional<br><input type="checkbox"/> To Be Modified | <input type="checkbox"/> To be Removed<br><input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To be Replaced            | N/A                | N/A |
|                          |                                  |               |           |          |  |  | 1986   | 15                          |                                   |  |   |                    |     |
| 16                       | Blowdown Flare                   | John Zink     | N/A       | N/A      | 6 mmscfd   | 6 mmscfd   | 2002   | N/A                         | 30600903                          | <input checked="" type="checkbox"/> Existing (unchanged)<br><input type="checkbox"/> New/Additional<br><input type="checkbox"/> To Be Modified | <input type="checkbox"/> To be Removed<br><input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To be Replaced            | N/A                | N/A |
|                          |                                  |               |           |          |  |  | 2002   | 16                          |                                   |  |   |                    |     |
| SSM/M1                   | SSM & Malfunction Emissions      | N/A           | N/A       | N/A      | N/A  | N/A  | N/A  | N/A                         | 30600903                          | <input checked="" type="checkbox"/> Existing (unchanged)<br><input type="checkbox"/> New/Additional<br><input type="checkbox"/> To Be Modified | <input type="checkbox"/> To be Removed<br><input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To be Replaced            | N/A                | N/A |
|                          |                                  |               |           |          |  |  | N/A  | N/A                         |                                   |  |   |                    |     |
| MALF                     | Amine Unit Still Vent/Flash Tank | N/A           | N/A       | N/A      | N/A  | N/A  | 1986   | 15                          | 31000305                          | <input checked="" type="checkbox"/> Existing (unchanged)<br><input type="checkbox"/> New/Additional<br><input type="checkbox"/> To Be Modified | <input type="checkbox"/> To be Removed<br><input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To be Replaced            | N/A                | N/A |
|                          |                                  |               |           |          |  |  | 1986   | 15                          |                                   |  |   |                    |     |
| CT                       | Cooling Tower                    | N/A           | N/A       | N/A      | N/A  | N/A  | 1986   | N/A                         | 31000299                          | <input checked="" type="checkbox"/> Existing (unchanged)<br><input type="checkbox"/> New/Additional<br><input type="checkbox"/> To Be Modified | <input type="checkbox"/> To be Removed<br><input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To be Replaced            | N/A                | N/A |
|                          |                                  |               |           |          |  |  | 1986   | CT                          |                                   |  |   |                    |     |
| 4                        | Natural Gas Fired Turbine        | Solar Centaur | 40-4700 S | TBD      | 4700 hp  | 4138 hp  | 2023   | N/A                         | 20200201                          | <input type="checkbox"/> Existing (unchanged)<br><input type="checkbox"/> New/Additional<br><input type="checkbox"/> To Be Modified            | <input type="checkbox"/> To be Removed<br><input checked="" type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To be Replaced | N/A                | 4   |
|                          |                                  |               |           |          |  |  | TBD  | 4                           |                                   |  |   |                    |     |
| 5                        | Natural Gas Fired Turbine        | Solar Centaur | 40-4700 S | TBD      | 4700 hp  | 4138 hp  | 2023   | N/A                         | 20200201                          | <input type="checkbox"/> Existing (unchanged)<br><input type="checkbox"/> New/Additional<br><input type="checkbox"/> To Be Modified            | <input type="checkbox"/> To be Removed<br><input checked="" type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To be Replaced | N/A                | 5   |
|                          |                                  |               |           |          |  |  | TBD  | 5                           |                                   |  |   |                    |     |

<sup>1</sup> Unit numbers must correspond to unit numbers in the previous permit unless a complete cross reference table of all units in both permits is provided.

<sup>2</sup> Specify dates required to determine regulatory applicability.

<sup>3</sup> To properly account for power conversion efficiencies, generator set rated capacity shall be reported as the rated capacity of the engine in horsepower, not the kilowatt capacity of the generator set.

<sup>4</sup> "4SLB" means four stroke lean burn engine, "4SRB" means four stroke rich burn engine, "2SLB" means two stroke lean burn engine, "CI" means compression ignition, and "SI" means spark ignition

**Table 2-B: Exempted Equipment (20.2.72 NMAC)**

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

| Unit Number | Source Description  | Manufacturer | Model No.  | Max Capacity   | List Specific 20.2.72.202 NMAC Exemption<br>(e.g. 20.2.72.202.B.5) | Date of<br>Manufacture<br>/Reconstruction <sup>2</sup> | For Each Piece of Equipment, Check One  |
|-------------|---------------------|--------------|------------|----------------|--|--|---|
|             |                     |              | Serial No. | Capacity Units | Insignificant Activity citation (e.g. IA List<br>Item #1.a)        | Date of Installation<br>/Construction <sup>2</sup>     |   |
| Saddle Tank | Diesel Fuel Tank    | N/A          | N/A        | 500            | 20.2.72.202.B.2  | 1986   | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced |
|             |                     |              | N/A        | gal            | IA List Item #5  | 1986   |   |
| TK 1401     | Methanol Tank       | N/A          | N/A        | 8400           | 20.2.72.202.B.5  | 1986   | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced |
|             |                     |              | N/A        | gal            | IA List Item #1a   | 1986   |   |
| TK 1402     | Used Oil Tank       | N/A          | N/A        | 21,000         | 20.2.72.202.B.2  | 1986   | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced |
|             |                     |              | N/A        | gal            | IA List Item #5  | 1986   |   |
|             | Misc. Small Vessels | N/A          | N/A        | N/A            | 20.2.72.202.B.5  |  | <input checked="" type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced |
|             |                     |              | N/A        | N/A            | IA List Item #1a   |  |   |
|             |                     |              |            |                |  |  | <input type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced            |
|             |                     |              |            |                |  |  |   |
|             |                     |              |            |                |  |  | <input type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced            |
|             |                     |              |            |                |  |  |   |
|             |                     |              |            |                |  |  | <input type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced            |
|             |                     |              |            |                |  |  |   |
|             |                     |              |            |                |  |  | <input type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced            |
|             |                     |              |            |                |  |  |   |
|             |                     |              |            |                |  |  | <input type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced            |
|             |                     |              |            |                |  |  |   |
|             |                     |              |            |                |  |  | <input type="checkbox"/> Existing (unchanged) <input type="checkbox"/> To be Removed<br><input type="checkbox"/> New/Additional <input type="checkbox"/> Replacement Unit<br><input type="checkbox"/> To Be Modified <input type="checkbox"/> To be Replaced            |
|             |                     |              |            |                |  |  |   |

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

<sup>2</sup> Specify date(s) required to determine regulatory applicability.

**Table 2-C: Emissions Control Equipment**

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

| Control Equipment Unit No. | Control Equipment Description | Date Installed | Controlled Pollutant(s) | Controlling Emissions for Unit Number(s) <sup>1</sup> | Efficiency (% Control by Weight) | Method used to Estimate Efficiency |
|----------------------------|-------------------------------|----------------|-------------------------|---|----------------------------------|------------------------------------|
| 1                          | Oxidation Catalyst            | 1986           | CO / VOC                | 1   | CO: 95%<br>VOC: 85%              | Previous App                       |
| 2                          | Oxidation Catalyst            | 1986           | CO / VOC                | 2   | CO: 95%<br>VOC: 85%              | Previous App                       |
| 3                          | Oxidation Catalyst            | 1986           | CO / VOC                | 3   | CO: 95%<br>VOC: 85%              | Previous App                       |
| 9                          | Safety System Flare           | 1986           | VOC / HAP               | Facility Wide SSM                                     | 98%                              | Manufacturer                       |
| 15                         | Thermal Oxidizer              | 1986           | VOC / HAP / H2S         | Amine Unit  | 98%                              | Manufacturer                       |
| 16                         | Blowdown Flare                | 2002           | VOC / HAP / H2S         | Facility Wide SSM, Amine Unit                         | 98%                              | Manufacturer                       |
|                            |                               |                |                         |   |                                  |                                    |
|                            |                               |                |                         |   |                                  |                                    |
|                            |                               |                |                         |   |                                  |                                    |
|                            |                               |                |                         |   |                                  |                                    |

<sup>1</sup> List each control device on a separate line. For each control device, list all emission units controlled by the control device.

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

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

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

| Unit No.          | NO <sub>x</sub> |        | CO     |         | VOC   |        | SO <sub>x</sub> |        | PM <sup>1</sup> |        | PM10 <sup>1</sup> |        | PM2.5 <sup>1</sup> |        | H <sub>2</sub> S |        | Lead    |         |
|-------------------|-----------------|--------|--------|---------|-------|--------|-----------------|--------|-----------------|--------|-------------------|--------|--------------------|--------|------------------|--------|---------|---------|
|                   | lb/hr           | ton/yr | lb/hr  | ton/yr  | lb/hr | ton/yr | lb/hr           | ton/yr | lb/hr           | ton/yr | lb/hr             | ton/yr | lb/hr              | ton/yr | lb/hr            | ton/yr | lb/hr   | ton/yr  |
| 1                 | 56.30           | 246.40 | 90.00  | 394.20  | 10.00 | 43.80  | 0.060           | 0.26   | 0.81            | 3.60   | 0.81              | 3.60   | 0.81               | 3.60   | --               | --     | 0.00011 | 0.0005  |
| 2                 | 56.30           | 246.40 | 90.00  | 394.20  | 10.00 | 43.80  | 0.060           | 0.26   | 0.81            | 3.60   | 0.81              | 3.60   | 0.81               | 3.60   | --               | --     | 0.00011 | 0.0005  |
| 3                 | 56.30           | 246.40 | 90.00  | 394.20  | 10.00 | 43.80  | 0.060           | 0.26   | 0.81            | 3.60   | 0.81              | 3.60   | 0.81               | 3.60   | --               | --     | 0.00011 | 0.0005  |
| 4                 | 3.74            | 16.38  | 4.56   | 19.99   | 1.309 | 5.73   | 0.080           | 0.351  | 0.25            | 1.08   | 0.25              | 1.08   | 0.25               | 1.08   | --               | --     | 0.00052 | 0.0023  |
| 5                 | 3.74            | 16.38  | 4.56   | 19.99   | 1.309 | 5.73   | 0.080           | 0.351  | 0.25            | 1.08   | 0.25              | 1.08   | 0.25               | 1.08   | --               | --     | 0.00052 | 0.0023  |
| 6                 | 15.90           | 69.80  | 2.30   | 10.00   | 0.05  | 0.24   | 0.010           | 0.05   | 0.22            | 0.95   | 0.22              | 0.95   | 0.22               | 0.95   | --               | --     | #####   | 0.00010 |
| 7                 | 15.90           | 69.80  | 2.30   | 10.00   | 0.05  | 0.24   | 0.010           | 0.05   | 0.22            | 0.95   | 0.22              | 0.95   | 0.22               | 0.95   | --               | --     | #####   | 0.00010 |
| 8                 | 0.75            | 3.30   | 0.35   | 1.47    | 0.030 | 0.14   | 0.010           | 0.040  | 0.11            | 0.48   | 0.11              | 0.48   | 0.11               | 0.48   | --               | --     | --      | --      |
| 9                 | 0.17            | 0.72   | 0.44   | 1.94    | 0.17  | 0.73   | --              | --     | --              | --     | --                | --     | --                 | --     | --               | --     | --      | --      |
| 12                | 0.34            | 1.49   | 0.10   | 0.30    | 0.020 | 0.080  | 0.010           | 0.010  | 0.030           | 0.11   | 0.03              | 0.11   | 0.030              | 0.11   | --               | --     | --      | --      |
| 13                | 0.75            | 3.30   | 0.34   | 1.47    | 0.030 | 0.14   | 0.010           | 0.040  | 0.11            | 0.48   | 0.11              | 0.48   | 0.11               | 0.48   | --               | --     | --      | --      |
| 14                | --              | --     | --     | --      | 8.68  | 38.01  | --              | --     | --              | --     | --                | --     | --                 | --     | --               | --     | --      | --      |
| 15                | 1.62            | 7.08   | 1.36   | 5.95    | 0.43  | 1.86   | 2.71            | 11.92  | 0.11            | 0.47   | 0.11              | 0.47   | 0.11               | 0.47   | 0.030            | 0.13   | --      | --      |
| 16                | 1.33            | 5.84   | 3.57   | 15.64   | 1.60  | 7.02   | 1.21            | 5.33   | --              | --     | --                | --     | --                 | --     | 0.010            | 0.06   | --      | --      |
| CT                | --              | --     | --     | --      | --    | --     | --              | --     | 0.36            | 1.58   | 0.15              | 0.64   | 0.020              | 0.10   | --               | --     | --      | --      |
| SSM & Malfunction | 259.84          | 10.00  | 45.50  | 10.00   | --    | 10.00  | --              | --     | --              | --     | --                | --     | --                 | --     | --               | --     | --      | --      |
| Amine Unit        | --              | --     | --     | --      | 16.04 | 70.27  | --              | --     | --              | --     | --                | --     | --                 | --     | 1.32             | 5.80   | --      | --      |
| <b>Totals</b>     | 472.98          | 943.29 | 335.39 | 1279.34 | 59.72 | 271.60 | 4.31            | 18.92  | 4.08            | 17.98  | 3.87              | 17.04  | 3.74               | 16.50  | 1.36             | 5.99   | -       | -       |

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

**Table 2-E: Requested Allowable Emissions**

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

| Unit No.          | NOx  |        | CO    |        | VOC   |        | SOx   |        | PM <sup>1</sup> |        | PM10 <sup>1</sup> |        | PM2.5 <sup>1</sup> |        | H <sub>2</sub> S |        | Lead     |         |
|-------------------|--|--------|-------|--------|-------|--------|-------|--------|-----------------|--------|-------------------|--------|--------------------|--------|------------------|--------|----------|---------|
|                   | lb/hr  | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr           | ton/yr | lb/hr             | ton/yr | lb/hr              | ton/yr | lb/hr            | ton/yr | lb/hr    | ton/yr  |
| 1                 | 56.30  | 246.40 | 9.60  | 42.00  | 0.30  | 1.30   | 0.060 | 0.26   | 0.81            | 3.56   | 0.81              | 3.56   | 0.81               | 3.56   | --               | --     | 0.00011  | 0.00050 |
| 2                 | 56.30  | 246.40 | 9.60  | 42.00  | 0.30  | 1.30   | 0.060 | 0.26   | 0.81            | 3.56   | 0.81              | 3.56   | 0.81               | 3.56   | --               | --     | 0.00011  | 0.00050 |
| 3                 | 56.30  | 246.40 | 9.60  | 42.00  | 0.30  | 1.30   | 0.060 | 0.26   | 0.81            | 3.56   | 0.81              | 3.56   | 0.81               | 3.56   | --               | --     | 0.00011  | 0.00050 |
| 4                 | 3.74   | 16.38  | 4.56  | 19.99  | 1.309 | 5.73   | 0.080 | 0.35   | 0.25            | 1.08   | 0.25              | 1.08   | 0.25               | 1.08   | --               | --     | 0.00052  | 0.0023  |
| 5                 | 3.74   | 16.38  | 4.56  | 19.99  | 1.309 | 5.73   | 0.080 | 0.35   | 0.25            | 1.08   | 0.25              | 1.08   | 0.25               | 1.08   | --               | --     | 0.00052  | 0.0023  |
| 6                 | 15.90  | 69.80  | 2.30  | 10.00  | 0.05  | 0.24   | 0.010 | 0.05   | 0.22            | 0.95   | 0.22              | 0.95   | 0.22               | 0.95   | --               | --     | 0.000023 | 0.00010 |
| 7                 | 15.90  | 69.80  | 2.30  | 10.00  | 0.05  | 0.24   | 0.010 | 0.05   | 0.22            | 0.95   | 0.22              | 0.95   | 0.22               | 0.95   | --               | --     | 0.000023 | 0.00010 |
| 8                 | 0.75   | 3.30   | 0.35  | 1.47   | 0.030 | 0.14   | 0.010 | 0.04   | 0.11            | 0.48   | 0.11              | 0.48   | 0.11               | 0.48   | --               | --     | --       | --      |
| 9                 | 0.17   | 0.72   | 0.44  | 1.94   | 0.17  | 0.73   | --    | --     | --              | --     | --                | --     | --                 | --     | --               | --     | --       | --      |
| 12                | 0.34   | 1.49   | 0.10  | 0.30   | 0.020 | 0.080  | 0.010 | 0.010  | 0.030           | 0.11   | 0.030             | 0.11   | 0.030              | 0.11   | --               | --     | --       | --      |
| 13                | 0.75   | 3.30   | 0.34  | 1.47   | 0.030 | 0.14   | 0.010 | 0.040  | 0.11            | 0.48   | 0.11              | 0.48   | 0.11               | 0.48   | --               | --     | --       | --      |
| 14                | --   | --     | --    | --     | 8.68  | 38.01  | --    | --     | --              | --     | --                | --     | --                 | --     | --               | --     | --       | --      |
| 15                | 1.62   | 7.08   | 1.36  | 5.95   | 0.43  | 1.86   | 2.71  | 11.92  | 0.11            | 0.47   | 0.11              | 0.47   | 0.11               | 0.47   | 0.03             | 0.13   | --       | --      |
| 16                | 1.33   | 5.84   | 3.57  | 15.64  | 1.60  | 7.02   | 1.21  | 5.33   | --              | --     | --                | --     | --                 | --     | 0.01             | 0.06   | --       | --      |
| CT                | --   | --     | --    | --     | --    | --     | --    | --     | 0.36            | 1.58   | 0.15              | 0.64   | 0.020              | 0.10   | --               | --     | --       | --      |
| SSM & Malfunction | 259.84   | 10.00  | 45.50 | 10.00  | --    | 10.00  | --    | --     | --              | --     | --                | --     | --                 | --     | --               | --     | --       | --      |
| Amine Unit        | Emissions from the Amine Unit are routed to the thermal oxidizer (unit 15) or flare (unit 16). Controlled emissions are represented under unit 15 and unit 16. |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |          |         |
| <b>Totals</b>     | 472.98   | 943.29 | 94.19 | 222.74 | 14.58 | 73.83  | 4.31  | 18.92  | 4.08            | 17.86  | 3.87              | 16.92  | 3.74               | 16.38  | 0.040            | 0.19   | 0.0014   | 0.0063  |

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

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

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

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

| Unit No.          | NOx    |        | CO    |        | VOC   |        | SOx   |        | PM <sup>2</sup> |        | PM10 <sup>2</sup> |        | PM2.5 <sup>2</sup> |        | H <sub>2</sub> S |        | Lead  |        |
|-------------------|--------|--------|-------|--------|-------|--------|-------|--------|-----------------|--------|-------------------|--------|--------------------|--------|------------------|--------|-------|--------|
|                   | lb/hr  | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr | ton/yr | lb/hr           | ton/yr | lb/hr             | ton/yr | lb/hr              | ton/yr | lb/hr            | ton/yr | lb/hr | ton/yr |
| SSM & Malfunction | 259.84 | 10.00  | 45.50 | 10.00  | --    | 10.00  | --    | --     | --              | --     | --                | --     | --                 | --     | --               | --     | --    | --     |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
|                   |        |        |       |        |       |        |       |        |                 |        |                   |        |                    |        |                  |        |       |        |
| Totals            | 259.84 | 10.00  | 45.50 | 10.00  | -     | 10.00  | -     | -      | -               | -      | -                 | -      | -                  | -      | -                | -      | -     | -      |

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

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

**Table 2-H: Stack Exit Conditions**

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

| Stack Number | Serving Unit Number(s)<br>from Table 2-A | Orientation<br>(H=Horizontal<br>V=Vertical) | Rain Caps<br>(Yes or No) | Height Above<br>Ground (ft) | Temp.<br>(F) | Flow Rate |         | Moisture by<br>Volume<br>(%) | Velocity<br>(ft/sec) | Inside<br>Diameter (ft) |
|--------------|--|---|--------------------------|-----------------------------|--------------|-----------|---------|------------------------------|----------------------|-------------------------|
|              |  |   |                          |                             |              | (acfs)    | (dscfs) |                              |                      |                         |
| 1            | 1  | V   | No                       | 56                          | 750          | --        | 13102   |                              | 46.7                 | 18.9                    |
| 2            | 2  | V   | No                       | 45                          | 370          | --        | 10218   |                              | 35.2                 | 10.5                    |
| 2 Bypass     | 2  | V   | No                       | 45                          | 750          | --        | 348     |                              | 133.9                | 6.5                     |
| 3            | 3  | V   | No                       | 45                          | 370          | --        | 10218   |                              | 35.2                 | 10.5                    |
| 3 Bypass     | 3  | V   | No                       | 45                          | 750          | --        | 348     |                              | 133.9                | 6.5                     |
| 4            | 4  | V   | No                       | 30.8                        | 820          | --        | 1197.3  |                              | 140.0                | 3.3                     |
| 5            | 5  | V   | No                       | 30.8                        | 820          | --        | 1197.3  |                              | 140.0                | 3.3                     |
| 6            | 6  | V   | No                       | 30.8                        | 827          | --        | 855.3   |                              | 100.0                | 3.3                     |
| 7            | 7  | V   | No                       | 30.8                        | 827          | --        | 855.3   |                              | 100.0                | 3.3                     |
| 8            | 8  | V   | No                       | 78.3                        | 664          | --        | 124.7   |                              | 48.7                 | 3.1                     |
| 9            | 9  | V   | No                       | 200                         | 1832         | --        | 37.23   |                              | 65.6                 | 0.9                     |
| 12           | 12                                       | V   | No                       | 15.3                        | 550          | --        | 25.3    |                              | 14.3                 | 1.5                     |
| 13           | 13                                       | V   | No                       | 78.3                        | 664          | --        | 124.7   |                              | 48.7                 | 3.1                     |
| 14           | 14                                       | N/A   | N/A                      | Fugitives                   | N/A          | --        | N/A     |                              | N/A                  | N/A                     |
| 15           | 15                                       | V   | No                       | 40                          | 1200         | --        | 201.5   |                              | 28.5                 | 3.0                     |
| 16           | 16                                       | V   | No                       | 60                          | 1832         | --        | 34.6    |                              | 65.6                 | 0.8                     |

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

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

| Stack No.  | Unit No.(s) | Total HAPs   |        | Acetaldehyde<br>☒ HAP |        | Formaldehyde<br>☒ HAP |        | n-Hexane<br>☒ HAP |        | Benzene<br>☒ HAP |        | Toluene<br>☒ HAP |        | Ethylbenzene<br>☒ HAP |        | Xylene<br>☒ HAP |        | Provide Pollutant Name<br>Here<br>☐ HAP or ☐ TAP |        |
|------------|-------------|--|--------|-----------------------|--------|-----------------------|--------|-------------------|--------|------------------|--------|------------------|--------|-----------------------|--------|-----------------|--------|--|--------|
|            |             | lb/hr  | ton/yr | lb/hr                 | ton/yr | lb/hr                 | ton/yr | lb/hr             | ton/yr | lb/hr            | ton/yr | lb/hr            | ton/yr | lb/hr                 | ton/yr | lb/hr           | ton/yr | lb/hr  | ton/yr |
| 1          | 1           | 0.20   | 1.00   | 0.10                  | 0.40   | 0.10                  | 0.40   | --                | --     | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| 2          | 2           | 0.20   | 1.00   | 0.10                  | 0.40   | 0.10                  | 0.40   | --                | --     | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| 3          | 3           | 0.20   | 1.00   | 0.10                  | 0.40   | 0.10                  | 0.40   | --                | --     | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| 4          | 4           | 0.038  | 0.17   | 0.0015                | 0.0066 | 0.027                 | 0.12   | --                | --     | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| 5          | 5           | 0.038  | 0.17   | 0.0015                | 0.0066 | 0.0266                | 0.12   | --                | --     | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| 6          | 6           | 0.30   | 1.50   | 0.10                  | 0.60   | 0.10                  | 0.60   | --                | 0.10   | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| 7          | 7           | 0.30   | 1.50   | 0.10                  | 0.60   | 0.10                  | 0.60   | --                | 0.10   | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| 8          | 8           | --   | 0.10   | --                    | --     | --                    | --     | --                | --     | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| 9          | 9           | --   | --     | --                    | --     | --                    | --     | --                | --     | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| 12         | 12          | --   | --     | --                    | --     | --                    | --     | --                | --     | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| 13         | 13          | --   | --     | --                    | --     | --                    | --     | --                | --     | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| 14         | 14          | 0.30   | 1.20   | --                    | --     | --                    | --     | --                | 0.80   | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| 15         | 15          | 0.11   | 0.49   | --                    | --     | --                    | --     | --                | --     | 0.070            | 0.32   | 0.030            | 0.15   | --                    | --     | 0.010           | 0.020  | --   | --     |
| 16         | 16          | 0.05   | 0.21   | --                    | --     | --                    | --     | --                | --     | 0.030            | 0.14   | 0.010            | 0.060  | --                    | --     | 0.010           | 0.010  | --   | --     |
| CT         | CT          | --   | --     | --                    | --     | --                    | --     | --                | --     | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| SSM/M      | SSM/M       | --   | 1.35   | --                    | --     | --                    | --     | --                | 1.21   | --               | --     | --               | --     | --                    | --     | --              | --     | --   | --     |
| Amine Unit | Amine Unit  | Emissions from the Amine Unit are routed to the thermal oxidizer (unit 15) or flare (unit 16). Controlled emissions are represented under unit 15 and unit 16. |        |                       |        |                       |        |                   |        |                  |        |                  |        |                       |        |                 |        |  |        |
| Totals:    |             | 1.74   | 9.69   | 0.50                  | 2.41   | 0.55                  | 2.63   | --                | 2.21   | 0.10             | 0.46   | 0.040            | 0.21   | --                    | --     | 0.020           | 0.030  | --   | --     |

**Table 2-J: Fuel**

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

| Unit No. | Fuel Type (low sulfur Diesel, ultra low sulfur diesel, Natural Gas, Coal, ...) | Fuel Source: purchased commercial, pipeline quality natural gas, residue gas, raw/field natural gas, process gas (e.g. SRU tail gas) or other | Specify Units       |                        |                         |                     |            |
|----------|--|---|---------------------|------------------------|-------------------------|---------------------|------------|
|          |  |   | Lower Heating Value | Hourly Usage (MSCF/hr) | Annual Usage (MMSCF/yr) | % Sulfur            | % Ash      |
| 1        | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 123.20                 | 1079.20                 | 5 gr/100 scf max    | Negligible |
| 2        | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 123.20                 | 1079.20                 | 5 gr/100 scf max    | Negligible |
| 3        | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 123.20                 | 1079.20                 | 5 gr/100 scf max    | Negligible |
| 4        | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 32.90                  | 327.62                  | 0.75 gr/100 scf max | Negligible |
| 5        | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 32.90                  | 327.62                  | 0.75 gr/100 scf max | Negligible |
| 6        | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 37.40                  | 288.20                  | 5 gr/100 scf max    | Negligible |
| 7        | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 37.40                  | 288.20                  | 5 gr/100 scf max    | Negligible |
| 8        | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 16.20                  | 141.90                  | 5 gr/100 scf max    | Negligible |
| 9        | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 1.10                   | 10.00                   | 5 gr/100 scf max    | Negligible |
| 12       | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 3.40                   | 29.80                   | 5 gr/100 scf max    | Negligible |
| 13       | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 16.20                  | 141.90                  | 5 gr/100 scf max    | Negligible |
| 15       | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 12.00                  | 105.10                  | 5 gr/100 scf max    | Negligible |
| 16       | Pipeline Quality Natural Gas   | Pipeline Quality Natural Gas  | 1000                | 1.10                   | 288.20                  | 5 gr/100 scf max    | Negligible |

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

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

| Tank No.    | SCC Code | Material Name | Composition | Liquid Density (lb/gal) | Vapor Molecular Weight (lb/lb*mol) | Average Storage Conditions |                            | Max Storage Conditions |                            |
|-------------|----------|---------------|-------------|-------------------------|------------------------------------|----------------------------|----------------------------|------------------------|----------------------------|
|             |          |               |             |                         |                                    | Temperature (°F)           | True Vapor Pressure (psia) | Temperature (°F)       | True Vapor Pressure (psia) |
| Saddle Tank | 31088811 | Diesel Fuel   | Diesel Fuel | Exempt Source           |                                    |                            |                            |                        |                            |
| TK 1401     | 31088811 | Methanol      | Methanol    | Exempt Source           |                                    |                            |                            |                        |                            |
| TK 1402     | 31088811 | Used Oil      | Used Oil    | Exempt Source           |                                    |                            |                            |                        |                            |
|             |          |               |             |                         |                                    |                            |                            |                        |                            |
|             |          |               |             |                         |                                    |                            |                            |                        |                            |
|             |          |               |             |                         |                                    |                            |                            |                        |                            |
|             |          |               |             |                         |                                    |                            |                            |                        |                            |
|             |          |               |             |                         |                                    |                            |                            |                        |                            |
|             |          |               |             |                         |                                    |                            |                            |                        |                            |
|             |          |               |             |                         |                                    |                            |                            |                        |                            |
|             |          |               |             |                         |                                    |                            |                            |                        |                            |

Table 2-L: Tank Data

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

| Tank No.    | Date Installed | Materials Stored | Seal Type<br>(refer to Table 2-LR below) | Roof Type<br>(refer to Table 2-LR below) | Capacity |                   | Diameter (M)  | Vapor Space (M) | Color<br>(from Table VI-C) |       | Paint Condition<br>(from Table VI-C) | Annual Throughput<br>(gal/yr) | Turn-overs<br>(per year) |
|-------------|----------------|------------------|--|--|----------|-------------------|---------------|-----------------|----------------------------|-------|--------------------------------------|-------------------------------|--------------------------|
|             |                |                  |  |  | (bbl)    | (M <sup>3</sup> ) |               |                 | Roof                       | Shell |                                      |                               |                          |
| Saddle Tank | N/A            | Diesel Fuel      | N/A                                      | FX                                       | 12       | 1.9               | Exempt Source |                 |                            |       |                                      |                               |                          |
| TK 1401     | N/A            | Methanol         | N/A                                      | FX                                       | 200      | 31.8              | Exempt Source |                 |                            |       |                                      |                               |                          |
| TK 1402     | N/A            | Used Oil         | N/A                                      | FX                                       | 500      | 79.5              | Exempt Source |                 |                            |       |                                      |                               |                          |

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

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

Note: 1.00 bbl = 0.159 M³ = 42.0 gal

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

| Material Processed |                      |                                  |                          | Material Produced   |                      |         |                             |
|--------------------|----------------------|----------------------------------|--------------------------|---------------------|----------------------|---------|-----------------------------|
| Description        | Chemical Composition | Phase<br>(Gas, Liquid, or Solid) | Quantity (specify units) | Description         | Chemical Composition | Phase   | Quantity<br>(specify units) |
| Natural Gas        | Varies               | Gas                              | 600 MMSCFD               | Residue Gas         | Methane              | Gas     | 600 MMSCFD                  |
|                    |                      |                                  |                          | Natural Gas Liquids | Mixed Hydrocarbons   | Liquids | 55,000 bbl/d                |
|                    |                      |                                  |                          |                     |                      |         |                             |
|                    |                      |                                  |                          |                     |                      |         |                             |
|                    |                      |                                  |                          |                     |                      |         |                             |

Table 2-N: CEM Equipment

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

| Stack No.                                       | Pollutant(s) | Manufacturer | Model No. | Serial No. | Sample Frequency | Averaging Time | Range | Sensitivity | Accuracy |
|---|--------------|--------------|-----------|------------|------------------|----------------|-------|-------------|----------|
| N/A - This facility will have no CEM Equipment. |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |
|   |              |              |           |            |                  |                |       |             |          |

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

[illegible]

**Table 2-P: Greenhouse Gas Emissions**

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

|          |                   | CO <sub>2</sub><br>ton/yr | N <sub>2</sub> O<br>ton/yr | CH <sub>4</sub><br>ton/yr | SF <sub>6</sub><br>ton/yr | PFC/HFC<br>ton/yr <sup>2</sup> |  |  |  |  |  |  |  |  | Total GHG<br>Mass Basis<br>ton/yr <sup>4</sup> | Total CO <sub>2</sub> e<br>ton/yr <sup>5</sup> |
|----------|-------------------|---------------------------|----------------------------|---------------------------|---------------------------|--------------------------------|--|--|--|--|--|--|--|--|--|--|
| Unit No. | GWPs <sup>1</sup> | 1                         | 298                        | 25                        | 22,800                    | footnote 3                     |  |  |  |  |  |  |  |  |  |  |
| 1        | mass GHG          | 62,990.45                 | 0.12                       | 1.19                      |                           |                                |  |  |  |  |  |  |  |  | 62,991.76                                      |  |
|          | CO <sub>2</sub> e | 62,990.45                 | 35.46                      | 29.75                     |                           |                                |  |  |  |  |  |  |  |  |  | 63,055.66                                      |
| 2        | mass GHG          | 62,990.45                 | 0.12                       | 1.19                      |                           |                                |  |  |  |  |  |  |  |  | 62,991.76                                      |  |
|          | CO <sub>2</sub> e | 62,990.45                 | 35.46                      | 29.75                     |                           |                                |  |  |  |  |  |  |  |  |  | 63,055.66                                      |
| 3        | mass GHG          | 62,990.45                 | 0.12                       | 1.19                      |                           |                                |  |  |  |  |  |  |  |  | 62,991.76                                      |  |
|          | CO <sub>2</sub> e | 62,990.45                 | 35.46                      | 29.75                     |                           |                                |  |  |  |  |  |  |  |  |  | 63,055.66                                      |
| 4        | mass GHG          | 19,162.28                 | 0.036                      | 0.36                      |                           |                                |  |  |  |  |  |  |  |  | 19,162.68                                      |  |
|          | CO <sub>2</sub> e | 19,162.28                 | 10.728                     | 9.00                      |                           |                                |  |  |  |  |  |  |  |  |  | 19,182.01                                      |
| 5        | mass GHG          | 19,162.28                 | 0.036                      | 0.36                      |                           |                                |  |  |  |  |  |  |  |  | 19,162.68                                      |  |
|          | CO <sub>2</sub> e | 19,162.28                 | 10.728                     | 9.00                      |                           |                                |  |  |  |  |  |  |  |  |  | 19,182.01                                      |
| 6        | mass GHG          | 16,821.31                 | 0.030                      | 0.32                      |                           |                                |  |  |  |  |  |  |  |  | 16,821.66                                      |  |
|          | CO <sub>2</sub> e | 16,821.31                 | 9.45                       | 7.93                      |                           |                                |  |  |  |  |  |  |  |  |  | 16,838.69                                      |
| 7        | mass GHG          | 16,821.31                 | 0.030                      | 0.32                      |                           |                                |  |  |  |  |  |  |  |  | 16,821.66                                      |  |
|          | CO <sub>2</sub> e | 16,821.31                 | 9.45                       | 7.93                      |                           |                                |  |  |  |  |  |  |  |  |  | 16,838.69                                      |
| 8        | mass GHG          | 7,439.21                  | 0.01                       | 0.14                      |                           |                                |  |  |  |  |  |  |  |  | 7,439.36                                       |  |
|          | CO <sub>2</sub> e | 7,439.21                  | 4.17                       | 3.50                      |                           |                                |  |  |  |  |  |  |  |  |  | 7,446.88                                       |
| 9        | mass GHG          | 692.43                    | 0.00115                    | 3.59                      |                           |                                |  |  |  |  |  |  |  |  | 696.02   |  |
|          | CO <sub>2</sub> e | 692.43                    | 0.34                       | 89.75                     |                           |                                |  |  |  |  |  |  |  |  |  | 782.52   |
| 12       | mass GHG          | 1,738.37                  | 3.28E-03                   | 0.03                      |                           |                                |  |  |  |  |  |  |  |  | 1,738.40                                       |  |
|          | CO <sub>2</sub> e | 1,738.37                  | 0.98                       | 0.82                      |                           |                                |  |  |  |  |  |  |  |  |  | 1,740.17                                       |
| 13       | mass GHG          | 7,439.21                  | 0.01                       | 0.14                      |                           |                                |  |  |  |  |  |  |  |  | 7,439.36                                       |  |
|          | CO <sub>2</sub> e | 7,439.21                  | 4.17                       | 3.50                      |                           |                                |  |  |  |  |  |  |  |  |  | 7,446.88                                       |
| 14       | mass GHG          | 8.87                      | --                         | 166.37                    |                           |                                |  |  |  |  |  |  |  |  | 175.24   |  |
|          | CO <sub>2</sub> e | 8.87                      | --                         | 4,159.25                  |                           |                                |  |  |  |  |  |  |  |  |  | 4,168.12                                       |
| 15       | mass GHG          | 6,135.43                  | 0.01                       | 0.12                      |                           |                                |  |  |  |  |  |  |  |  | 6,135.56                                       |  |
|          | CO <sub>2</sub> e | 6,135.43                  | 3.46                       | 2.90                      |                           |                                |  |  |  |  |  |  |  |  |  | 6,141.79                                       |
| 16       | mass GHG          | 5,686.55                  | 8.17E-03                   | 29.46                     |                           |                                |  |  |  |  |  |  |  |  | 5,716.02                                       |  |
|          | CO <sub>2</sub> e | 5,686.55                  | 2.43                       | 736.5                     |                           |                                |  |  |  |  |  |  |  |  |  | 6,425.48                                       |
| SSM/M    | mass GHG          | 2.33                      | --                         | 43.77                     |                           |                                |  |  |  |  |  |  |  |  | 46.10  |  |
|          | CO <sub>2</sub> e | 2.33                      | --                         | 1,094.25                  |                           |                                |  |  |  |  |  |  |  |  |  | 1,096.58                                       |
| Total    | mass GHG          | 290080.93                 | 0.53                       | 248.55                    |                           |                                |  |  |  |  |  |  |  |  | 290,330.01                                     |  |
|          | CO <sub>2</sub> e | 290080.93                 | 162.29                     | 6213.58                   |                           |                                |  |  |  |  |  |  |  |  |  | 296,456.80                                     |

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

<sup>2</sup> For HFCs or PFCs describe the specific HFC or PFC compound and use a separate column for each individual compound.

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

<sup>4</sup> Green house gas emissions on a **mass basis** is the ton per year green house gas emission before adjustment with its GWP.

<sup>5</sup> CO<sub>2</sub>e means Carbon Dioxide Equivalent and is calculated by multiplying the TPY mass emissions of the green house gas by its GWP.

# Section 3

## Application Summary

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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](http://www.env.nm.gov/aqb/permit/app_form.html)) for more detailed instructions on SSM emissions.

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The San Juan Gas Plant is owned and operated by Hilcorp Energy Company (Hilcorp) and is located 0.9 miles northeast of Bloomfield, NM in San Juan County. This application seeks a significant revision to the NSR permit pursuant to NMAC 20.2.72.219.D(1). The facility is also an existing PSD major source. The current application does not trigger a PSD modification. Therefore, the application is submitted under 20.2.72.219.D(1).

The facility receives two field natural gas streams (high and low pressure) and hydrocarbon liquids are extracted via a cryogenic process. The resulting residue gas and hydrocarbon liquids are delivered, primarily via pipelines, to customers. The facility is currently authorized to operate under NSR Permit No. 0613-M13 and Title V Operating Permit No. P124-R4 to operate the following equipment/sources:

- Three Rolls Royce Avon 1535 natural gas fired turbines driving gas compressors (Units 1-3);
- Four Solar Centaur T4501 natural gas fired turbines driving generators (Units 4-7);
- Two WILLBROS Downstream natural gas fired regeneration heaters (Units 8 and 13);
- One Broach natural gas fired regeneration heater (Unit 12);
- One Caterpillar G3412 diesel fired emergency generator (Unit 10);
- One Caterpillar G3406 diesel fired fire water pump (Unit 11);
- One John Zink plant safety system flare (Unit 9);
- One John Zink staged flare to work in conjunction with the safety system flare (Unit 16);
- One Callidus thermal oxidizer (Unit 15);
- Facility fugitive emissions (Unit 14); and
- SSM and malfunction emissions (SSM/M1).

With this application, Hilcorp seeks to replace two Solar Centaur T4501 natural gas-fired turbines, which drive generators (Units 4 & 5) with two (2) Solar Centaur 40-4700S natural gas-fired turbines (Rated power 4138 hp). The function of these replacement units will be equivalent to the existing units. After this modification, there will be no changes to the facility's status with regards to Title V or PSD as this facility will remain a major source for both.

Some or all of the facility's piping will be blown down for safety purposes in the event of an emergency or during maintenance. In addition, the shutdown of turbines involves the purging of gas contained within the equipment. With the exception of the six PSVs, all blowdown and emergency shutdown emissions are routed to a system of two flares (Units 9 and 16) that are part of a staged flare system. Non-routine emissions from De-methanizers are released into the atmosphere. The characterization of SSM/M emissions is not proposed to change with this modification.

# Section 4

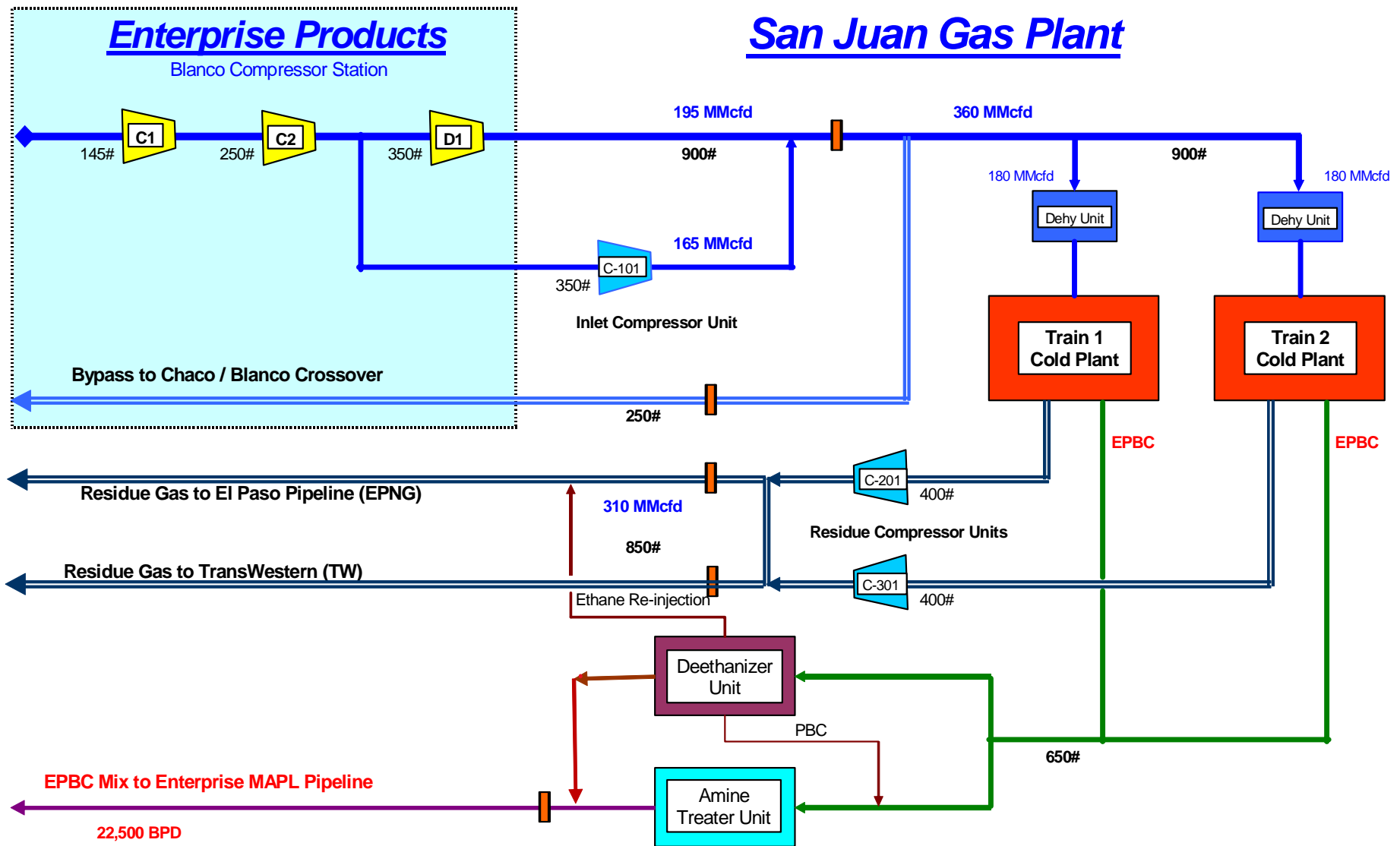
## Process Flow Sheet

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

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A process flow diagram is attached to this application.



**Gas & Liquid Flow Diagram**

# Section 5

## Plot Plan Drawn to Scale

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

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A plot plan of this facility is attached to this application.

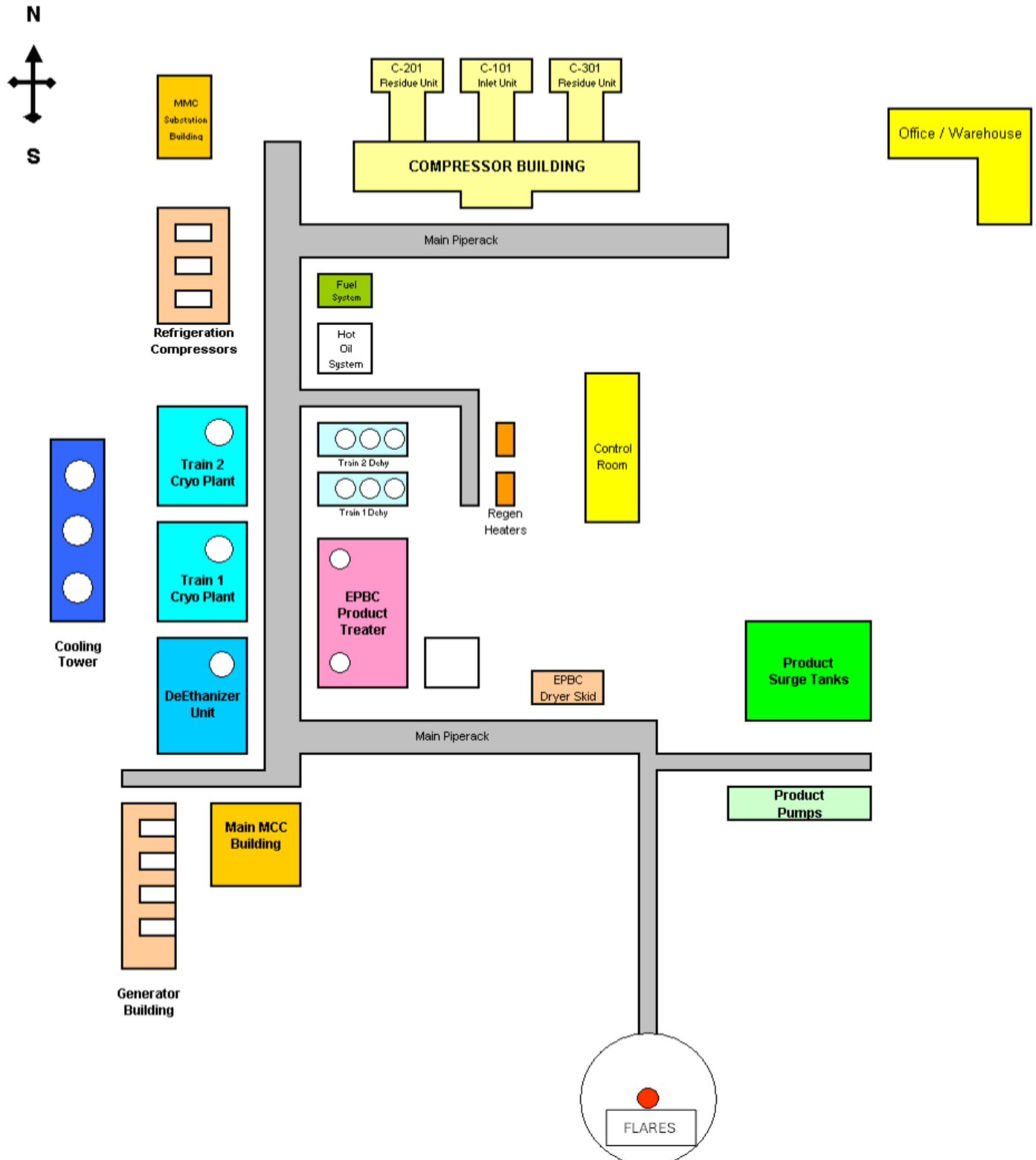
| ITEM | EQUIPMENT DESCRIPTION                        | EQUIPMENT #                   | ITEM | EQUIPMENT DESCRIPTION                            | EQUIPMENT #                    |
|------|--|-------------------------------|------|--|--------------------------------|
| 1    | HOT OIL HEATERS (2)                          | WH-1101, A, B                 | 46   | EP PRODUCT TRIM COOLER                           | E-902                          |
| 2    | RESIDUE COMPRESSORS (2)                      | C-201/301                     | 47   | EP COMPRESSOR SUCTION SCRUBBER                   | V-904                          |
| 3    | INLET COMPRESSOR                             | C-100                         | 48   | EP PRODUCT COMPRESSORS (2)                       | C-901, A, B                    |
| 4    | HEAVY ATMO OIL SKIDS (6)                     | AC-105                        | 49   | PBC COOLER                                       | AC-901                         |
| 5    | RESIDUE COMPRESSOR SUCTION SCRUBBERS (2)     | V-201/301                     | 50   | EP COMPRESSOR AFTERCOOLER                        | AC-902                         |
| 6    | LOW PRESSURE INLET GAS SEPARATOR             | V-102                         | 51   | COOLING WATER CIRCULATING PUMPS (3)              | P-1201, A, B, C                |
| 7    | HOT OIL TRIM COOLER (OOS)                    | AC-1103                       | 52   | WATER TREATING OX 1201 SODIUM HYPERCHLORIDE      | P-1208, A, B                   |
| 8    | RESIDUE COMPRESSOR AFTERCOOLERS (3)          | AC-100-201-301                | 53   | ACID STORAGE TANK                                | V-1201                         |
| 9    | INLET COMPRESSOR AFTERCOOLER                 | AC-105                        | 54   | WATER TREATING CHEMICAL TANKS (2)                | AT-1201                        |
| 10   | HIGH PRESSURE INLET COOLER                   | E-101                         | 55   | DEMINERALIZED WATER PUMP                         | P-1407                         |
| 11   | HIGH PRESSURE INLET GAS SEPARATOR            | V-101                         | 56   | DEMINERALIZED WATER STORAGE TANK (3)             | TK-802                         |
| 12   | INLET COMPRESSOR TRIM COOLER                 | E-102                         | 57   | POWER GENERATORS (4)                             | G-1300 A, B, C, D              |
| 13   | INLET COMPRESSOR DISCHARGE SCRUBBER          | V-103                         | 58   | BACK UP GENERATOR                                | G-1301                         |
| 14   | RECYCLE COOLERS (12)                         | E-201/801                     | 59   | HSW-700 STORAGE TANK                             | TK-804A                        |
| 15   | HIGH PRESSURE FUEL GAS SCRUBBER              | V-1404                        | 60   | WASTE LUBE OIL PUMP                              | P-1414                         |
| 16   | LOW PRESSURE FUEL GAS SCRUBBER               | V-1405                        | 61   | INSTRUMENT AIR RECEIVER                          | V-1408                         |
| 17   | HOT OIL EXPANSION VESSEL                     | V-13101                       | 62   | UTILITY AIR RECEIVER                             | V-1407                         |
| 18   | HOT OIL PUMPS (3)                            | P-1101-ABC                    | 63   | INSTRUMENT AIR DRIER                             | M-1409                         |
| 19   | REGEN GAS HEATERS (2)                        | A-401/501                     | 64   | INSTRUMENT/UTILITY AIR COMPRESSOR (3)            | P-1401, A, B, C                |
| 20A  | INLET GAS DEHYD.-COOLERS                     | AC-401 (TRAIN #2 OF 2)        | 65   | FLARE KNOCKOUT DRUM PUMP                         | P-1406                         |
| 20B  | INLET GAS DEHYD.-DEHYDRATORS (3)             | V-401 (TRAIN #2 OF 2)         | 66   | FLARE KNOCKOUT DRUM                              | V-1406                         |
| 20C  | INLET GAS DEHYD.-DUST FILTER                 | F-402 (TRAIN #2 OF 2)         | 67   | EPIC PRODUCT SURGE TANKS (3)                     | V-902, A, B, C                 |
| 20D  | INLET GAS DEHYD.-FILTER SEPARATOR            | F-401A (TRAIN #2 OF 2)        | 68   | PROPANE STORAGE TANK                             | V-1007                         |
| 20E  | INLET GAS DEHYD.-REGEN COMPR. & OIL COOLER   | V-402 (TRAIN #2 OF 2)         | 69   | PBC PRODUCT SURGE TANKS (4)                      | P-903, A, B, C, D              |
| 20F  | INLET GAS DEHYD.-REGEN SCRUBBER              | V-402 (TRAIN #2 OF 2)         | 70   | WASTEWATER STORAGE TANK                          | TK-1403                        |
| 20G  | INLET GAS COALESCE                           | F-401B (TRAIN #2 OF 2)        | 71   | SLOP OIL STORAGE TANK                            | TK-1402                        |
| 21   | SULFA CHECK SYSTEM                           | TK-804                        | 72   | EPIC PRODUCT PIPELINE PUMPS (4) (DECOMMISSIONED) | P-903, A, B, C                 |
| 22   | EPIC PRODUCT DEHYD. SKID                     | H-900, 906 A/B/V-607          | 73   | EPIC PRODUCT BOOSTER PUMPS (3)                   | P-903, A, B, C                 |
| 23   | EPIC PRODUCT DEHYD REGEN HEATER              | TK-801                        | 74   | EPIC PRODUCT PIPELINE PUMPS (3)                  | P-903, A, B, C                 |
| 24   |  |                               | 75   |  |                                |
| 25   |  |                               | 76   |  |                                |
| 26   | WASTEWATER & AMINE STORAGE TANK              | TK-802                        | 77   | CLOSED DRAIN PUMP                                | P-906                          |
| 27   | AMINE STORAGE TANK                           | TK-801                        | 78   | GENERATOR LUBE OIL TANK                          | TK-1300                        |
| 28   | AMINE COOLER                                 | AC-801                        | 79   | HSW-700 PUMP                                     | P-808                          |
| 29   | AMINE MAKEUP PUMP                            | P-805                         | 80   | SKIM PIT SLOP OIL PUMP                           | P-1404                         |
| 30   | AMINE SUMP PUMPS (2)                         | P-805, A, B                   | 81   | COOLING TOWER                                    | CT-1201                        |
| 31   | AMINE DRAIN TANK PUMP                        | P-804                         | 82   | PRODUCT METERING AREA & MAPCO MTR. AREA          |                                |
| 32   | AMINE STILL REFLUX FANS                      | AC-802                        | 83   | TRUCK LOADING CONNECTIONS (HVL)                  |                                |
| 33   |  |                               | 84   | TRUCK LOADING CONNECTIONS (FLAMMABLE LQ.)        |                                |
| 34A  | AMINE TREATING- CONTACTOR                    | T-801                         | 85   | GAS ANALYZER BUILDING (5)                        |                                |
| 34B  | AMINE TREATING- AMINE COALESCE               | H-803                         |      |  |                                |
| 34C  | AMINE TREATING- FLASH VESSEL                 | H-802                         | 86   | TURBINE MAKE-UP LUBE OIL TANK                    | TK-101                         |
| 34D  | AMINE TREATING- COOL AMINE EXCHANGER         | H-801                         | 88   | COLD DRAIN VESSEL                                | V-1403                         |
| 34E  | AMINE TREATING- CIRCULATION PUMPS (3)        | P-801, A, B, C                | 89   | PROCESS WATER TANK                               | TK-1203                        |
| 34F  | AMINE TREATING- SURGE VESSEL                 | H-804                         | 90A  | INLET GAS DEHYD.- COOLERS                        | AC-501 (TRAIN #1 OF 2)         |
| 34G  | AMINE TREATING- CHARCOAL FILTER              | H-808                         | 90B  | INLET GAS DEHYD.- DEHYDRATORS (3)                | V-501 (TRAIN #1 OF 2)          |
| 34H  | AMINE TREATING- SLOP FILTER                  | E-802                         | 90C  | INLET GAS DEHYD.- DUST FILTER                    | F-502 (TRAIN #1 OF 2)          |
| 34I  | AMINE TREATING- HOT AMINE EXCHANGER          | E-802                         | 90D  | INLET GAS DEHYD.- FILTER SEPARATOR               | F-501A (TRAIN #1 OF 2)         |
| 34J  | AMINE TREATING- STILL+VAP. REBOILER          | T-802 & B-803                 | 90E  | INLET GAS DEHYD.- REGEN. COMPR. & OIL COOLER     | C-501 (TRAIN #1 OF 2)          |
| 34K  | AMINE TREATING- STILL REFLUX PUMPS (2)       | P-802, A, B                   | 90F  | INLET GAS DEHYD.- REGEN SCRUBBER                 | V-502 (TRAIN #2 OF 2)          |
| 35A  | REFRIGERANT SUBCOOLER                        | E-1002                        | 91   | CRVO, TRAIN- DEMETH. UPPER SIDE REBOILER         | F-701A (TRAIN #1 OF 2)         |
| 35B  | REFRIGERANT COMP. -ECONOMIZER                | V-1004                        | 91A  | CRVO, TRAIN- GAS/GAS & COLD GAS/GAS EXCH.        | E-702, E-702 (TRAIN #2 OF 2)   |
| 35C  | REFRIGERANT COMP. -COMPRESSORS (3)           | C-1001 A, B, C                | 91B  | CRVO, TRAIN- EXPANDER/COMPRESSOR                 | X-701 (TRAIN #2 OF 2)          |
| 36   | REFRIGERANT CONDENSER                        | E-1001                        | 91C  | CRVO, TRAIN- DEMETHANIZER - COLD VENT            | T-701 (TRAIN #2 OF 2)          |
| 37   | REFRIGERANT ACCUMULATOR                      | V-1003                        | 91D  | CRVO, TRAIN- DEMETH. UPPER SIDE REBOILER         | E-705 (TRAIN #2 OF 2)          |
| 38   | REFRIGERANT SUBCOOLER                        | E-1002                        | 91E  | CRVO, TRAIN- COLD SEPARATOR                      | F-701A (TRAIN #1 OF 2)         |
| 39A  | CRVO, TRAIN-1- GAS/GAS & COLD GAS EXCH.      | E-601, E-602 (TRAIN 1 OF 2)   | 91F  | CRVO, TRAIN- DEMETH. BOTTOM PUMPS (3)            | F-701, A, B, C (TRAIN #2 OF 2) |
| 39B  | CRVO, TRAIN-1- EXPANDER/COMPRESSOR           | X-601 (TRAIN 1 OF 2)          | 91G  | CRVO, TRAIN- DEMETH. & TRIM REBOILERS            | E-705, E-706 (TRAIN #2 OF 2)   |
| 39C  | CRVO, TRAIN-1- DEMETHANIZER - COLD VENT      | T-601 (TRAIN 1 OF 2)          | 91H  | CRVO, TRAIN- LOWEST SIDE REBOILER                | E-707 (TRAIN #2 OF 2)          |
| 39D  | CRVO, TRAIN-1- DEMETH. UPPER SIDE REBOILER   | F-605 (TRAIN 1 OF 2)          | 91I  | CRVO, TRAIN- LOW STORAGE REFRIG. RECLAIMER       | P-704 (TRAIN #2 OF 2)          |
| 39E  | CRVO, TRAIN-1- COLD SEPARATOR                | F-601 (TRAIN 1 OF 2)          | 92   | CRVO, TRAIN- GAS CHILLER                         | T-704 (TRAIN #2 OF 2)          |
| 39F  | CRVO, TRAIN-1- DEMETH. BOTTOM PUMPS (3)      | P-601, A, B, C (TRAIN 1 OF 2) | 93   | BACK UP GENERATOR DIESEL TANK                    | TK-1301                        |
| 39G  | CRVO, TRAIN-1- DEMETH. & TRIM REBOILERS      | E-603, E-606 (TRAIN 1 OF 2)   | 93   | WATER TANK (UNUSED)                              | TK-1202                        |
| 39H  | CRVO, TRAIN-1- LOWER SIDE REBOILER           | F-607 (TRAIN 1 OF 2)          | 94   | FIRE WATER PUMP DIESEL TANK                      | TK-01                          |
| 39I  | CRVO, TRAIN-1- LOW STORAGE REFRIG. RECLAIMER | P-1008 (TRAIN 1 OF 2)         | 95   | THERMAL OIL CHILLER                              | TO-860                         |
| 39J  | CRVO, TRAIN-1- GAS CHILLER                   | T-604 (TRAIN 1 OF 2)          | 96   | WASTE LUBE OIL TANK                              | TK-1402A                       |
| 40   | METHANOL INJECTION PUMP                      | P-1401                        | 97   | AMINE STILL REFLUX ACCUMULATOR                   | V-805                          |
| 41   | METHANOL STORAGE TANK                        | TK-1401                       | 98   | VAPOR RECOVERY COMPRESSOR                        | P-1415/C-1412                  |
| 42   | CLOSD DRAIN VESSEL                           | P-1403                        | 99   | SKIMMER PIT- PROCESS WASTE PUMPS                 | C-1403, A, B                   |
| 43   | CLOSD DRAIN VESSEL                           | P-1402                        | 100  | 36 INCH FLEX                                     | AT-1404                        |
| 44A  | DETHANIZER- REBOILER                         | E-904                         | 101  | 36 INCH FLEX                                     | AT-1404                        |
| 44B  | DETHANIZER                                   | E-903                         | 102  | EVAP. COOLERS                                    | M-101/M-201/M-301              |
| 44C  | DETHANIZER- SIDE REBOILER                    | E-905                         | 103  | DIESEL TANK                                      | EQUIPMENT FUEL                 |
| 44D  | DETHANIZER- REFLUX CONDENSER                 | E-901                         | 104  | FIRE WATER TANK                                  | TK-100                         |
| 44E  | DETHANIZER- REFLUX PUMPS (3)                 | P-901, A, B, C                | 105  | FIRE WATER PUMP                                  | P-100                          |
| 44F  | DETHANIZER- REFLUX ACCUMULATOR               | V-901                         | 106  | INLET GAS FILTER                                 | F-101                          |
| 44G  | DETHANIZER- HIGH-STATE REFRIG. RECLAIMER     | V-1006                        | 107  | WASTE WATER PIPELINE PUMP                        | P-H20                          |
| 45   | EP PRODUCT CHILLER                           | E-903                         | 108  | SPECIAL WASTE CONTAINMENT PAD                    | (NO EQUIPMENT NUMBER)          |
| 45A  | EP METER SKID                                |                               | 109  | WASTE LUBE TANK                                  | TK-1414                        |
| 45B  | EP REINJECTION PUMP                          | P-970                         | 110  |  |                                |

[illegible]

|   |   |                                     |                            |
|---|---|-------------------------------------|----------------------------|
|  | Issue Date:<br><b>January 13, 2015</b>  | Revision No.:<br><b>3</b>           | Procedure Number:          |
|   | Document Owner:   | Review Frequency:<br><b>5 Years</b> | Page Number:<br><b>B-2</b> |
| Document Title:   | <b>Spill Prevention, Control, and Countermeasure Plan</b><br>San Juan Gas Plant |                                     |                            |

## *San Juan Gas Plant*

### *Major Equipment Layout*



# Section 6

## All Calculations

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

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

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

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

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

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

**Significant Figures:**

- A. All emissions standards are deemed to have at least two significant figures, but not more than three significant figures.
- B. At least 5 significant figures shall be retained in all intermediate calculations.
- C. In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:

- (1) If the first digit to be discarded is less than the number 5, the last digit retained shall not be changed;
- (2) If the first digit discarded is greater than the number 5, or if it is the number 5 followed by at least one digit other than the number zero, the last figure retained shall be increased by one unit; **and**
- (3) If the first digit discarded is exactly the number 5, followed only by zeros, the last digit retained shall be rounded upward if it is an odd number, but no adjustment shall be made if it is an even number.
- (4) The final result of the calculation shall be expressed in the units of the standard.

**Control Devices:** In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions. The applicant can indicate in this section of the application if they chose to not take credit for the reduction in emission rates. For notices of intent submitted under 20.2.73 NMAC, only uncontrolled emission rates can be considered to determine applicability unless the state or federal Acts require the control. This information is necessary to determine if federally enforceable conditions are necessary for the control device, and/or if the control device produces its own regulated pollutants or increases emission rates of other pollutants.

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### Calculations Carried forward from Previous Application (No Requested Changes)

#### **Amine Vent (Unit: Amine Unit)**

All emissions from this unit are calculated using ProMax.

Emissions from the Amine Unit are controlled by the Thermal Oxidizer in ethane recovery mode and by the Flare in ethane rejection mode. Controlled emissions are represented under Unit 15 (Thermal Oxidizer) and Unit 16 (Flare).

#### **Thermal Oxidizer (Unit: 15)**

When the facility is in ethane recovery mode, the amine unit vents to the thermal oxidizer (Unit: 15). NO<sub>x</sub>, CO, VOC, PM, and SO<sub>2</sub> emissions are calculated using AP-42 factors for external natural gas combustion sources in Tables 1.4-1 and 1.4-2. As a conservative measure, it is assumed that TSP = PM<sub>10</sub> = PM<sub>2.5</sub>. HAPs, VOC, and H<sub>2</sub>S emissions are calculated using streams from ProMax. The ProMax gas analysis for the facility is attached in Section 7. Greenhouse gas emissions are estimated using 40 CFR Part 98 and emission factors from Tables C-1 and C-2 of Part 98.

#### **Flare (Unit: 9 and 16)**

##### *Flare Pilot, Purge and Process Gas Streams*

Emissions from the plant safety system flare (Unit 9) and from the blowdown flare (Unit 16) are calculated based on estimated design throughput rates. Pilot, purge and process gas emission rates for NO<sub>x</sub> are based on emission factor taken from Texas Commission on Environmental Quality (TCEQ) January 2010 document "Technical Supplement 4: Flares" for air assisted or unassisted units combusting high-Btu waste streams (>1000 Btu/scf). CO & VOC emission factors are taken from AP-42, Table 13.5-1, 09-91.

There are no excess SSM emissions associated with operation of the flares. The flares do not require warm-up periods. Equipment is not turned on unless the flares are in operation and the flares are not shut down while equipment is in operation. No maintenance is conducted on the flare while they are in operation.

##### *Flare Waste Gas*

When the facility is in ethane rejection mode, the amine unit vents to the flare (Unit: 16). NO<sub>x</sub> and CO emissions are calculated using AP-42 Table 13.5-1 emission factors. HAPs, VOC, and H<sub>2</sub>S emissions are calculated using streams from ProMax. The ProMax gas analysis for the facility is attached in Section 7. The SO<sub>2</sub> composition is based on a 99% molar conversion of H<sub>2</sub>S to SO<sub>2</sub>. Emissions of greenhouse gases are calculated using methodology from 40 CFR Subpart 98.233(n).

##### *Cooling Tower (Unit: CT)*

The cooling tower water flow rate and drift loss data are provided by the manufacturer. The calculations were performed using a total dissolved solids (TDS) concentration of 1,995 ppm. Particle size distribution (PM, PM<sub>10</sub>, PM<sub>2.5</sub>) of the drift mass is based on information from the "Frisbie" paper equation.

Due to the nature of the source, it is estimated there are no startup or shutdown emissions associated with the cooling towers. No maintenance is conducted while the cooling towers are in operation.

NOTE: All the remaining calculations described below are unchanged from the previous application. Also, for simplicity of review, the Amine Unit, 9, 15, and CT emissions calculations worksheet in Section 6 and the supporting documentation in Section 7 have been moved to the front of these respective sections.

#### **Turbines (Units: 1-3, 6 & 7)**

Emissions from the turbines are carried forward from the last construction permit application. No modifications are being made to the turbines or their operation.

The NO<sub>x</sub>, CO, VOC and SO<sub>2</sub> emissions from the turbines are based on manufacturer's data as identified in the previous NSR application. Particulate emissions are calculated using the AP-42 emission factor from Table 3.1-2a. HAP emissions are calculated using GRI-HAPCalc 3.0. Emissions are calculated assuming each turbine operates at full site capacity for 8,760 hours per year.

The turbines at the plant start up with no load and a rich fuel mixture. As a result, emissions are minimized. Because the turbines take only minutes to reach operating temperature, emissions during startup are not expected to exceed the steady-state allowable limits. Similarly, emissions during shutdown do not exceed the steady-state allowable limits, because fuel and air flow cease at or within milliseconds of shutdown. Emissions due to scheduled maintenance are negligible as the turbines are not in operation during maintenance.

#### **Regeneration Heaters (Units: 8, 12, and 13)**

Emissions from the regeneration heaters are carried forward from the last construction permit application. No modifications are being made to the regeneration heaters or their operation.

The NO<sub>x</sub>, CO, VOC and SO<sub>2</sub> emissions from the large regeneration heaters (Units 8 and 13) are based on manufacturer's data as identified in the previous NSR application and include a safety factor. Emissions of these same pollutants from the small heater (Unit 12), as well as particulate emissions from all three heaters, are calculated using AP-42 emission factors from Tables 1.4-1 and 1.4-2. HAP emissions are calculated using GRI-HAPCalc 3.0. Emissions are calculated assuming each heater operates at full site capacity for 8,760 hours per year.

The heaters (uncontrolled) startup with less fuel input than during steady-state operation, so emissions are lower than during steady-state operation. During shutdown, the fuel supply stops quickly, but air flow may not, causing the continued formation of NO<sub>x</sub>. Even so, with no fuel, NO<sub>x</sub> formation should be less than during steady-state operation. Emissions due to scheduled maintenance are negligible as the units are not in operation.

### **Calculations Associated with the Proposed Revision**

#### **Turbines (Units: 4 & 5)**

The NO<sub>x</sub>, CO, and VOC emissions from the turbines are based on manufacturer's (Solar) data. Particulate (PM, PM<sub>10</sub>, PM<sub>2.5</sub>), lead (Pb), HAPs, are calculated using the AP-42 emission factors from Chapter 3.1. SO<sub>2</sub> emissions are based on an assumed fuel sulfur content of 0.75 gr S/100 scf, which is a conservative estimate. Emissions are calculated assuming each turbine operates at full site capacity for 8,760 hours per year.

The turbines at the plant start up with no load and a rich fuel mixture. As a result, emissions are minimized. Because the turbines take only minutes to reach operating temperature, emissions during startup are not expected to exceed the steady-state allowable limits. Similarly, emissions during shutdown do not exceed the steady-state allowable limits, because fuel and air flow cease at or within milliseconds of shutdown. Emissions due to scheduled maintenance are negligible as the turbines are not in operation during maintenance.

# Section 6.a

## Green House Gas Emissions

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

**Title V (20.2.70 NMAC), Minor NSR (20.2.72 NMAC), and PSD (20.2.74 NMAC)** applicants must estimate and report greenhouse gas (GHG) emissions to verify the emission rates reported in the public notice, determine applicability to 40 CFR 60 Subparts, and to evaluate Prevention of Significant Deterioration (PSD) applicability. GHG emissions that are subject to air permit regulations consist of the sum of an aggregate group of these six greenhouse gases: carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), methane (CH<sub>4</sub>), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>).

### Calculating GHG Emissions:

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

### Sources for Calculating GHG Emissions:

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

### Global Warming Potentials (GWP):

Applicants must use the Global Warming Potentials codified in Table A-1 of the most recent version of 40 CFR 98 Mandatory Greenhouse Gas Reporting. The GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to that of one unit mass of CO<sub>2</sub> over a specified time period.

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

### Metric to Short Ton Conversion:

Short tons for GHGs and other regulated pollutants are the standard unit of measure for PSD and title V permitting programs. 40 CFR 98 Mandatory Greenhouse Reporting requires metric tons.

1 metric ton = 1.10231 short tons (per Table A-2 to Subpart A of Part 98 – Units of Measure Conversions)

## Hilcorp Energy Co. - San Juan Gas Plant

### Solar Turbines

Emission Unit: 4-5  
 Source Description: Natural Gas-Fired Turbine  
 Manufacturer: Solar Turbines  
 Model: Centaur 40-4700 S, GSC Standard

MFG Rated Power: 3500 kW  
 4700 hp  
 Site Rated Power: 3086 kW  
 4138 hp

Per MFG Specifications  
 Per MFG Specifications  
 Site Rating  
 Site Rating

#### Horsepower Calculations

|              | Units        | Unit 4 | Unit 5 | Notes  |
|--------------|--------------|--------|--------|--|
| Elevation    | ft above MSL | 5,600  | 5,600  | Per Solar Specifications Provided on 8/15/2023 |
| Rated Power: | hp           | 4,138  | 4,138  | Per Solar Specifications Provided on 8/15/2023 |

#### Fuel Consumption

|                         | Units    | Unit 4 | Unit 5 | Notes   |
|-------------------------|----------|--------|--------|---|
| Annual Operating Time   | hr/yr    | 8,760  | 8,760  | Conservative Assumption   |
| Average Hours per Day   | hrs/day  | 24.0   | 24.0   | Conservative Assumption   |
| Fuel Heat Value         | Btu/scf  | 1,026  | 1,026  | Lower Heating Value as Permitted for the Site   |
| Heat Rate               | MMBtu/hr | 37.40  | 37.40  | Manufacturer Specification  |
| Hourly Fuel Consumption | MMscf/hr | 0.036  | 0.036  | Calculated Hourly Fuel Consumption (MMscf/hr) = hourly fuel flow (MMBtu/hr) / Fuel Lower Heating Value (Btu/scf)                                  |
| Annual Fuel Consumption | MMscf/yr | 319.32 | 319.32 | Calculated Annual Fuel Consumption (MMscf/yr) = hourly fuel flow (MMBtu/hr) * annual operating hours (hr/yr) / Fuel Lower Heating Value (Btu/scf) |

#### Emission Factors

|  | Units    | Unit 4   | Unit 5   | Notes  |
|--|----------|----------|----------|--|
| <b>Criteria Pollutants</b>                         |          |          |          |  |
| NO <sub>x</sub> <sup>1</sup>                       | lb/MMBtu | 0.100    | 0.100    | Per Solar Specifications Provided on 8/15/2023 |
| CO <sup>1</sup>                                    | lb/MMBtu | 0.122    | 0.122    | Per Solar Specifications Provided on 8/15/2023 |
| VOC <sup>1</sup>                                   | lb/MMBtu | 0.035    | 0.035    | Per Solar Specifications Provided on 8/15/2023 |
| SO <sub>2</sub> <sup>2</sup>                       | lb/MMBtu | 0.0021   | 0.0021   | Based on assumption of 0.75 gr S/100 scf       |
| PM <sup>3</sup>                                    | lb/MMBtu | 0.0066   | 0.0066   | AP-42, Table 3.1-2a for PM (Total)             |
| Pb <sup>4</sup>                                    | lb/MMBtu | 1.40E-05 | 1.40E-05 | AP-42 Table 3.1-2a                             |
| <b>Hazardous Air Pollutants (HAPs)<sup>5</sup></b> |          |          |          |  |
| Formaldehyde                                       | lb/MMBtu | 7.1E-04  | 7.10E-04 | AP-42, Table 3.1-3                             |
| Acetaldehyde                                       | lb/MMBtu | 4.0E-05  | 4.00E-05 | AP-42, Table 3.1-3                             |
| Acrolein   | lb/MMBtu | 6.4E-06  | 6.40E-06 | AP-42, Table 3.1-3                             |
| Benzene  | lb/MMBtu | 1.2E-05  | 1.20E-05 | AP-42, Table 3.1-3                             |
| Toluene  | lb/MMBtu | 1.3E-04  | 1.30E-04 | AP-42, Table 3.1-3                             |
| Ethylbenzene                                       | lb/MMBtu | 3.2E-05  | 3.20E-05 | AP-42, Table 3.1-3                             |
| Xylenes  | lb/MMBtu | 6.4E-05  | 6.40E-05 | AP-42, Table 3.1-3                             |
| 1,3-Butadiene                                      | lb/MMBtu | 4.3E-07  | 4.30E-07 | AP-42, Table 3.1-3                             |
| Naphthalene  | lb/MMBtu | 1.3E-06  | 1.30E-06 | AP-42, Table 3.1-3                             |
| PAH  | lb/MMBtu | 2.2E-06  | 2.20E-06 | AP-42, Table 3.1-3                             |
| Propylene Oxide                                    | lb/MMBtu | 2.9E-05  | 2.90E-05 | AP-42, Table 3.1-3                             |
| <b>Greenhouse Gases (GHGs)<sup>6</sup></b>         |          |          |          |  |
| CO <sub>2</sub>                                    | kg/MMBtu | 53.06    | 53.06    | 40 CFR 98 Subpart C Tables C-1 and C-2         |
|  | GWP      | 1        | 1        | 40 CFR 98 Table A-1                            |
| N <sub>2</sub> O                                   | kg/MMBtu | 0.0001   | 0.0001   | 40 CFR 98 Subpart C Tables C-1 and C-2         |
|  | GWP      | 298      | 298      | 40 CFR 98 Table A-1                            |
| CH <sub>4</sub>                                    | kg/MMBtu | 0.001    | 0.001    | 40 CFR 98 Subpart C Tables C-1 and C-2         |
|  | GWP      | 25       | 25       | 40 CFR 98 Table A-1                            |

## Emission Calculations

|        | Pollutants                      | Uncontrolled/Controlled Emission Rates* |                  |   |
|--------|---------------------------------|---|------------------|---|
|        |                                 | lb/hr <sup>7</sup>                      | tpy <sup>8</sup> | CO <sub>2</sub> e (ton/yr) <sup>9</sup> |
| Unit 4 | Criteria Pollutants             |   |                  |   |
|        | NO <sub>x</sub>                 | 3.74                                    | 16.38            | -                                       |
|        | CO                              | 4.56                                    | 19.99            | -                                       |
|        | VOC                             | 1.31                                    | 5.73             | -                                       |
|        | SO <sub>2</sub>                 | 0.078                                   | 0.34             | -                                       |
|        | PM                              | 0.25                                    | 1.08             | -                                       |
|        | Pb                              | 5.24E-04                                | 2.29E-03         | -                                       |
|        | Hazardous Air Pollutants (HAPs) |   |                  |   |
|        | Formaldehyde                    | 2.66E-02                                | 1.16E-01         | -                                       |
|        | Acetaldehyde                    | 1.50E-03                                | 6.55E-03         | -                                       |
|        | Acrolein                        | 2.39E-04                                | 1.05E-03         | -                                       |
|        | Benzene                         | 4.49E-04                                | 1.97E-03         | -                                       |
|        | Toluene                         | 4.86E-03                                | 2.13E-02         | -                                       |
|        | Ethylbenzene                    | 1.20E-03                                | 5.24E-03         | -                                       |
|        | Xylenes                         | 2.39E-03                                | 1.05E-02         | -                                       |
|        | 1,3-Butadiene                   | 1.61E-05                                | 7.04E-05         | -                                       |
|        | Naphthalene                     | 4.86E-05                                | 2.13E-04         | -                                       |
|        | PAH                             | 8.23E-05                                | 3.60E-04         | -                                       |
|        | Propylene Oxide                 | 1.08E-03                                | 4.75E-03         | -                                       |
|        | Total HAP                       | 0.038                                   | 0.17             | -                                       |
|        | Greenhouse Gases (GHGs)         |   |                  |   |
|        | CO <sub>2</sub> - Combustion    | 4374.95                                 | 19,162.28        | 19,162.28                               |
|        | N <sub>2</sub> O - Combustion   | 0.0082                                  | 0.036            | 10.76                                   |
|        | CH <sub>4</sub> - Combustion    | 0.082                                   | 0.36             | 9.03                                    |
| Unit 5 | Criteria Pollutants             |   |                  |   |
|        | NO <sub>x</sub>                 | 3.74                                    | 16.38            | -                                       |
|        | CO                              | 4.56                                    | 19.99            | -                                       |
|        | VOC                             | 1.31                                    | 5.73             | -                                       |
|        | SO <sub>2</sub>                 | 0.078                                   | 0.34             | -                                       |
|        | PM                              | 0.25                                    | 1.08             | -                                       |
|        | Pb                              | 5.24E-04                                | 2.29E-03         | -                                       |
|        | Hazardous Air Pollutants (HAPs) |   |                  |   |
|        | Formaldehyde                    | 2.66E-02                                | 1.16E-01         | -                                       |
|        | Acetaldehyde                    | 1.50E-03                                | 6.55E-03         | -                                       |
|        | Acrolein                        | 2.39E-04                                | 1.05E-03         | -                                       |
|        | Benzene                         | 4.49E-04                                | 1.97E-03         | -                                       |
|        | Toluene                         | 4.86E-03                                | 2.13E-02         | -                                       |
|        | Ethylbenzene                    | 1.20E-03                                | 5.24E-03         | -                                       |
|        | Xylenes                         | 2.39E-03                                | 1.05E-02         | -                                       |
|        | 1,3-Butadiene                   | 1.61E-05                                | 7.04E-05         | -                                       |
|        | Naphthalene                     | 4.86E-05                                | 2.13E-04         | -                                       |
|        | PAH                             | 8.23E-05                                | 3.60E-04         | -                                       |
|        | Propylene Oxide                 | 1.08E-03                                | 4.75E-03         | -                                       |
|        | Total HAP                       | 0.038                                   | 0.17             | -                                       |
|        | Greenhouse Gases (GHGs)         |   |                  |   |
|        | CO <sub>2</sub> - Combustion    | 4374.95                                 | 19,162.28        | 19,162.28                               |
|        | N <sub>2</sub> O - Combustion   | 0.0082                                  | 0.036            | 10.76                                   |
|        | CH <sub>4</sub> - Combustion    | 0.082                                   | 0.36             | 9.03                                    |

### Notes:

<sup>1</sup> NO<sub>x</sub>, CO, and VOC emission factors are based on Solar specifications provided on 8/15/2023.

<sup>2</sup> SO<sub>2</sub> emissions based on assumption of 0.75 gr S/100 scf.

<sup>3</sup> Assumed TSP = PM (Total) = PM<sub>10</sub> = PM<sub>2.5</sub>

<sup>4</sup> Pb emissions based on AP-42 Table 3.1-2a for Distillate Oil-Fired Turbines. No emission factor is listed for natural gas-fired turbines, so this factor is used as a conservative estimate.

<sup>5</sup> HAP emissions based on AP-42 Table 3.1-3.

<sup>6</sup> CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O emission factors and global warming potentials (GWPs) from 40 CFR Part 98 Subpart A and Subpart C.

<sup>7</sup> lb/hr emissions calculated as follows: lb/hr = Emission Factor (lb/MMBtu) \* Fuel Heat Rate (MMBtu/hr)

N<sub>2</sub>O, CH<sub>4</sub>, and CO<sub>2</sub> lb/hr Emission Rate= EF (kg/MMBtu)\* Fuel Usage (MMBtu/hr) \* 2.20462 lb/1 kg

<sup>8</sup> tpy emissions calculated as follows: ton/yr = lb/hr \* Annual Hours of Operation (hr/yr) \* 1 ton / 2000 lb

<sup>9</sup> CO<sub>2</sub>e Emission Rate = Emission Rate (ton/yr) \* GWP Factor

<sup>10</sup> Because no control devices or operating hour limitations are in place on the turbines, uncontrolled and controlled emissions for the units are identical.

| Exhaust Parameters                         |         |                    |
|--|---------|--------------------|
| Temperature                                | 820     | °F                 |
| Exhaust Flow                               | 128,421 | lbm/hr             |
| Density of Flue Gas at Exhaust Temperature | 0.0298  | lb/ft <sup>3</sup> |
| Exhaust Flow                               | 71,836  | cfm                |
| Exhaust Velocity                           | 139.98  | ft/s               |
| Diameter                                   | 3.30    | ft                 |
| Height                                     | 30.80   | ft                 |

All the remaining calculations described below are unchanged from the previous application

Harvest Four Corners, LLC - San Juan Gas Plant  
Amine Unit Emissions Calculations

Unit Number: Amine Unit

Description: Amine Unit Still Vent / Flash Tank

**Ethane Recovery Mode (High Flow)**

| Emissions    | VOC   |       | Total HAP |       | Benzene |       | Toluene |      | Ethylbenzene |      | Hexane |      | Xylene |      | H <sub>2</sub> S |      | CO <sub>2</sub> | CH <sub>4</sub> |
|--------------|-------|-------|-----------|-------|---------|-------|---------|------|--------------|------|--------|------|--------|------|------------------|------|-----------------|-----------------|
|              | pph   | tpy   | pph       | tpy   | pph     | tpy   | pph     | tpy  | pph          | tpy  | pph    | tpy  | pph    | tpy  | pph              | tpy  | tpy             | tpy             |
| Uncontrolled | 16.04 | 70.27 | 5.10      | 22.33 | 3.30    | 14.46 | 1.56    | 6.84 | 0.02         | 0.08 | 0.02   | 0.10 | 0.19   | 0.84 | 1.32             | 5.80 | 70,070.70       | 4.78            |

**Ethane Rejection Mode (Low Flow)**

| Emissions    | VOC   |       | Total HAP |       | Benzene |      | Toluene |      | Ethylbenzene |      | Hexane |      | Xylene |      | H <sub>2</sub> S |      | CO <sub>2</sub> | CH <sub>4</sub> |
|--------------|-------|-------|-----------|-------|---------|------|---------|------|--------------|------|--------|------|--------|------|------------------|------|-----------------|-----------------|
|              | pph   | tpy   | pph       | tpy   | pph     | tpy  | pph     | tpy  | pph          | tpy  | pph    | tpy  | pph    | tpy  | pph              | tpy  | tpy             | tpy             |
| Uncontrolled | 14.83 | 64.94 | 2.42      | 10.58 | 1.59    | 6.98 | 0.73    | 3.21 | 0.01         | 0.02 | 0.02   | 0.10 | 0.06   | 0.27 | 0.65             | 2.86 | 727.18          | 0.02            |

## Notes:

1. All emissions calculated using ProMax
2. Emissions from the Amine Unit are controlled by the Thermal Oxidizer (Unit 15) in ethane recovery mode and by the Flare (Unit 9) in ethane rejection mode.

Harvest Four Corners, LLC - San Juan Gas Plant  
Thermal Oxidizer Emissions Calculations

Unit Number: 15  
Description: Thermal oxidizer

**Fuel Consumption**

|               |  |   |
|---------------|--|---|
| 12.0 MMBtu/hr | Capacity                               | 2011 NSR application (manufacturer's data plus 10% safety factor) |
| 1,000 Btu/scf | Field gas heating value                | Nominal heat content  |
| 12,000 scf/hr | Hourly fuel consumption                | MMBtu/hr x 1,000,000 / Btu/scf                                    |
| 3,125 scfm    | Maximum waste gas fuel flow capacity   | 2011 NSR application (design maximum)                             |
| 0.5 Mole %    | Methane/Ethane waste gas concentration | ProMax  |
| 938 scf/hr    | Hourly waste gas consumption           | scfm x (mole % / 100) x 60 min/hr                                 |
| 8,760 hr/yr   | Annual operating time                  | Harvest Four Corners  |

**Fuel Gas Emission Rates**

| Pollutants <sup>2,3</sup> | Emission Factors <sup>1,4</sup> | Controlled Emission Rates |                  |
|---------------------------|---------------------------------|---------------------------|------------------|
|                           | lb/MMscf                        | pph <sup>5</sup>          | tpy <sup>6</sup> |
| NO <sub>x</sub>           | 100                             | 1.50                      | 6.57             |
| CO                        | 84                              | 1.26                      | 5.52             |
| VOC                       | 5.5                             | 0.07                      | 0.32             |
| SO <sub>2</sub>           | 0.6                             | 0.01                      | 0.03             |
| PM                        | 7.6                             | 0.10                      | 0.44             |
| PM <sub>10</sub>          | 7.6                             | 0.10                      | 0.44             |
| PM <sub>2.5</sub>         | 7.6                             | 0.10                      | 0.44             |

Notes:

<sup>1</sup> NO<sub>x</sub>, CO, VOC, SO<sub>2</sub> and PM emission factors taken from AP-42, Tables 1.4-1, 1.4-2.

<sup>2</sup> A safety factor of 25% is added to the NO<sub>x</sub> & CO emission rates.

<sup>3</sup> A safety factor of 10% is added to the VOC, PM, and SO<sub>2</sub> emission rates.

<sup>4</sup> The sulfur content of the natural gas is 5 S gr/100 dscf.

<sup>5</sup> Hourly Emission Rates (pph) = lb/MMscf x (scf/hr / 1,000,000) x 1.25.

<sup>6</sup> Annual Emission Rates (tpy) = Hourly Emission Rates (pph) x hr/yr x (1 ton / 2,000 lb).

**Amine Unit Waste Gas Stream (Ethane Recovery Mode)**

| Pollutants <sup>1,3</sup>      | Emission Factors <sup>1</sup> | Uncontrolled Emission Rates from Amine Unit <sup>2</sup> |       | Control Efficiencies <sup>6</sup> | Controlled Emission Rates |                        |
|--------------------------------|-------------------------------|--|-------|-----------------------------------|---------------------------|------------------------|
|                                | lb/MMscf                      | pph  | tpy   | %                                 | pph <sup>7,9,11</sup>     | tpy <sup>8,10,12</sup> |
| NO <sub>x</sub>                | 100                           |  |       |                                   | 0.12                      | 0.51                   |
| CO                             | 84                            |  |       |                                   | 0.10                      | 0.43                   |
| PM                             | 7.6                           |  |       |                                   | 0.01                      | 0.03                   |
| PM <sub>10</sub>               | 7.6                           |  |       |                                   | 0.01                      | 0.03                   |
| PM <sub>2.5</sub>              | 7.6                           |  |       |                                   | 0.01                      | 0.03                   |
| SO <sub>2</sub> <sup>4,5</sup> |                               |  |       |                                   | 2.71                      | 11.89                  |
| H <sub>2</sub> S <sup>4</sup>  |                               | 1.32   | 5.80  | 98                                | 0.03                      | 0.13                   |
| VOC <sup>4</sup>               |                               | 16.04  | 70.27 | 98                                | 0.35                      | 1.55                   |
| Benzene <sup>4</sup>           |                               | 3.30   | 14.46 | 98                                | 0.07                      | 0.32                   |
| Toluene <sup>4</sup>           |                               | 1.56   | 6.84  | 98                                | 0.03                      | 0.15                   |
| Ethylbenzene <sup>4</sup>      |                               | 0.02   | 0.08  | 98                                | 4.40E-04                  | 1.76E-03               |
| Hexane <sup>4</sup>            |                               | 0.02   | 0.10  | 98                                | 4.40E-04                  | 2.20E-03               |
| Xylene <sup>4</sup>            |                               | 0.19   | 0.84  | 98                                | 4.18E-03                  | 0.02                   |
| Total HAPs <sup>4</sup>        |                               | 5.10   | 22.33 | 98                                | 0.11                      | 0.49                   |

Notes:

<sup>1</sup> NO<sub>x</sub>, CO and PM emission factors taken from AP-42, Tables 1.4-1, 1.4-2.

<sup>2</sup> VOC, HAPs, and H<sub>2</sub>S uncontrolled emissions from the amine unit (in Ethane Recovery Mode) calculated using ProMax.

<sup>3</sup> A safety factor of 25% is added to the NO<sub>x</sub> & CO emission rates.

<sup>4</sup> A safety factor of 10% is added to the VOC, PM, SO<sub>2</sub>, and H<sub>2</sub>S emission rates.

<sup>5</sup> It is assumed 99% of the H<sub>2</sub>S is converted to SO<sub>2</sub>.

<sup>6</sup> The thermal oxidizer has a 98% control efficiency.

<sup>7</sup> Hourly NO<sub>x</sub> & CO Emission Rates (pph) = lb/MMscf x (scf/hr / 1,000,000) x 1.25.

<sup>8</sup> Annual NO<sub>x</sub> & CO Emission Rates (tpy) = Hourly Emission Rates (pph) x hr/yr x (1 ton / 2,000 lb).

<sup>9</sup> Controlled VOC & H<sub>2</sub>S Emission Rate (pph) = Uncontrolled Emission Rate (pph) x (1 - (% / 100)).

<sup>10</sup> Controlled VOC & H<sub>2</sub>S Emission Rate (tpy) = Uncontrolled Emission Rate (tpy) x (1 - (% / 100)).

<sup>11</sup> Controlled SO<sub>2</sub> Emission Rate (pph) = Uncontrolled H<sub>2</sub>S Emission Rate (pph) x (% / 100) x (32 lb S / 34 lb H<sub>2</sub>S) x (64 lb SO<sub>2</sub> / 32 lb S).

<sup>12</sup> Controlled SO<sub>2</sub> Emission Rate (tpy) = Controlled SO<sub>2</sub> Emission Rate (pph) x hr/yr x (1 ton / 2,000 lb).

Harvest Four Corners, LLC - San Juan Gas Plant  
Thermal Oxidizer Emissions Calculations

**Combined Emission Rates**

| Pollutants        | Controlled Emission Rates |          |
|-------------------|---------------------------|----------|
|                   | pph                       | tpy      |
| NO <sub>x</sub>   | 1.62                      | 7.08     |
| CO                | 1.36                      | 5.95     |
| PM                | 0.11                      | 0.47     |
| PM <sub>10</sub>  | 0.11                      | 0.47     |
| PM <sub>2.5</sub> | 0.11                      | 0.47     |
| SO <sub>2</sub>   | 2.71                      | 11.92    |
| H <sub>2</sub> S  | 0.03                      | 0.13     |
| VOC               | 0.43                      | 1.86     |
| Benzene           | 0.07                      | 0.32     |
| Toluene           | 0.03                      | 0.15     |
| Ethylbenzene      | 4.40E-04                  | 1.76E-03 |
| Hexane            | 4.40E-04                  | 2.20E-03 |
| Xylene            | 4.18E-03                  | 0.02     |
| Total HAPs        | 0.11                      | 0.49     |

**Exhaust Parameters**

|             |                     |  |
|-------------|---------------------|--|
| 1,200 °F    | Exhaust temperature | 2011 NSR application   |
| 28.50 fps   | Stack exit velocity | 2011 NSR application   |
| 3.0 ft      | Stack exit diameter | 2011 NSR application   |
| 12,087 acfm | Stack flowrate      | $\text{fps} \times 3.1416 \times ((\text{ft} / 2) ^2) \times 60 \text{ sec/min}$ |
| 40.0 ft     | Stack height        | 2011 NSR application   |

Harvest Four Corners, LLC - San Juan Gas Plant  
Plant Flare Emissions Calculations

Emission Unit: 16  
Description: Low Pressure Flare

**Pilot Gas Stream**

|               |                         |                      |
|---------------|-------------------------|----------------------|
| 100 scf/hr    | Pilot gas hour flowrate | Harvest Four Corners |
| 1,050 Btu/scf | Heat content            | Nominal heat content |

**Process Gas Stream**

|               |                         |                      |
|---------------|-------------------------|----------------------|
| 7970 scf/hr   | Purge gas hour flowrate | Harvest Four Corners |
| 1,050 Btu/scf | Heat content            | Nominal heat content |

**Relief Valve Gas Stream**

|                     |  |   |
|---------------------|--|---|
| 100 #               | Valve count                            | Harvest Four Corners  |
| 0.0088 kg/hr/source | EPA emission factor (gas service)      | 1995 Protocol for Equipment Leak<br>Emission Estimates, Table 2-4 |
| 1.94 pph            | Uncontrolled mass hourly emission rate | kg/hr/source x 2.2 lb/kg x valve count                            |
| 8.60 cf/lb          | Volume                                 | Nominal (propane)   |
| 16.65 cf/hr         | Purge gas hourly flow rate             | pph x cf/lb   |
| 2,517 Btu/scf       | Heat content                           | Nominal heat content  |

**Seal Leakage Gas Stream**

|               |  |                          |
|---------------|--|--------------------------|
| 950 scf/hr    | Purge gas hour flowrate                | Harvest Four Corners     |
| 1,050 Btu/scf | Heat content                           | Nominal heat content     |
| 23.6 cf/lb    | Volume                                 | Nominal (methane)        |
| 10 %          | VOC content of gas stream              | Harvest Four Corners     |
| 4.03 pph      | Uncontrolled mass hourly emission rate | scf/hr x (% 100) / cf/lb |

**Combined Gas Stream (Pilot & Process)**

|                 |                       |  |
|-----------------|-----------------------|--|
| 8,070 scf/hr    | Hourly flowrate       | Sum of individual streams                    |
| 1,050 Btu/scf   | Heat content          | Flow weighted average                        |
| 8.47 MMBtu/hr   | Hourly heat rate      | scf/hr x Btu/scf x (1 MMBtu / 1,000,000 Btu) |
| 8,760 hr/yr     | Annual operating time | Harvest Four Corners                         |
| 70.69 MMscf/yr  | Annual flowrate       | scf/hr x hr/yr x (1 MMscf / 1,000,000 scf)   |
| 74,228 MMBtu/yr | Annual heat rate      | MMBtu/hr x hr/yr                             |

**Combined Gas Stream (pilot, process, relief valves & seal leaks)**

|                 |                       |  |
|-----------------|-----------------------|--|
| 9,037 scf/hr    | Hourly flowrate       | Sum of individual streams                    |
| 1,053 Btu/scf   | Heat content          | Flow weighted average                        |
| 9.51 MMBtu/hr   | Hourly heat rate      | scf/hr x Btu/scf x (1 MMBtu / 1,000,000 Btu) |
| 8,760 hr/yr     | Annual operating time | Harvest Four Corners                         |
| 79.16 MMscf/yr  | Annual flowrate       | scf/hr x hr/yr x (1 MMscf / 1,000,000 scf)   |
| 83,333 MMBtu/yr | Annual heat rate      | MMBtu/hr x hr/yr                             |

**Steady-State Emission Rates**

| Pollutants      | Emission Factors <sup>2,3</sup> | Uncontrolled Emission Rates <sup>1</sup> |                  |
|-----------------|---------------------------------|--|------------------|
|                 | lb/MMBtu                        | pph <sup>4</sup>                         | tpy <sup>5</sup> |
| NO <sub>x</sub> | 0.138                           | 1.31                                     | 5.75             |
| CO              | 0.370                           | 3.52                                     | 15.42            |

Notes:

<sup>1</sup> NO<sub>x</sub> and CO emissions are calculated using data from the combined gas stream (pilot, process, relief valves & seal leaks).

<sup>2</sup> NO<sub>x</sub> emission factor taken from Texas Commission on Environmental Quality (TCEQ) February 2012 document "Technical Supplement 4: Flares" for air assisted or unassisted units combusting high-Btu waste streams (>1000 Btu/scf).

<sup>3</sup> CO emission factors taken from AP-42, Table 13.5-1, 09-91

<sup>4</sup> Uncontrolled Emission Rates (pph) = lb/MMBtu x MMBtu/hr

<sup>5</sup> Uncontrolled Emission Rates (tpy) = lb/MMBtu x MMBtu/yr x (1 ton/2,000 lb)

Harvest Four Corners, LLC - San Juan Gas Plant  
Plant Flare Emissions Calculations

**Steady-State Emission Rates (Continued)**

| Pollutants            | Emission Factors <sup>2</sup> | Uncontrolled Emission Rates <sup>1,5</sup> |                  | Control Efficiencies <sup>7</sup> | Controlled Emission Rates <sup>1,5</sup> |                    |
|-----------------------|-------------------------------|--|------------------|-----------------------------------|--|--------------------|
|                       | lb/MMBtu                      | pph  | tpy <sup>6</sup> | %                                 | pph <sup>3,8</sup>                       | tpy <sup>4,9</sup> |
| VOC (pilot & process) | 0.140                         | --   | --               | --                                | 1.19                                     | 5.20               |
| VOC (relief valves)   | --                            | 1.94                                       | 8.48             | 98                                | 0.04                                     | 0.17               |
| VOC (seal leaks)      | --                            | 4.03                                       | 17.63            | 98                                | 0.08                                     | 0.35               |
| Total                 |                               | 5.96                                       | 26.11            |                                   | 1.31                                     | 5.72               |

Notes:

<sup>1</sup> VOC (pilot & process) emission rates are calculated using the heat rates from only the pilot and process gas streams.<sup>2</sup> VOC (pilot & process) emission factor taken from AP-42, Table 13.5-1, 09-91.<sup>3</sup> Controlled VOC (pilot & process) Emission Rates (pph) = lb/MMBtu x MMBtu/hr<sup>4</sup> Controlled VOC (pilot & process) Emission Rates (tpy) = lb/MMBtu x MMBtu/yr x (1 ton/2,000 lb)<sup>5</sup> VOC (relief valves & seal leaks) emission rates are calculated using the pph emission rates (calculated above) from the relief valve and seal leaks gas streams, respectively.<sup>6</sup> Uncontrolled VOC (relief valves & seal leaks) Emission Rates (tpy) = pph x hr/yr x (1 ton/2,000 lb)<sup>7</sup> Control efficiencies taken from Texas Commission on Environmental Quality (TCEQ) February 2012 document "Technical Supplement 4: Flares."<sup>8</sup> Controlled VOC (relief valves & seal leaks) Emission Rates (pph) = Uncontrolled Emission Rates (pph) x (1-(% / 100))<sup>9</sup> Controlled VOC (relief valves & seal leaks) Emission Rates (tpy) = Uncontrolled Emission Rates (tpy) x (1-(% / 100))**Amine Unit Waste Gas Stream (Ethane Rejection Mode)**

|                |  |  |
|----------------|--|--|
| 35 scfm        | Maximum waste gas fuel flow capacity   | ProMax                                       |
| 15.5 Mole %    | Methane/Ethane waste gas concentration | ProMax                                       |
| 326 scf/hr     | Waste gas flowrate                     | scfm x (mole % / 100) x 60 min/hr            |
| 433 Btu/scf    | Waste gas heat content                 | ProMax                                       |
| 0.14 MMBtu/hr  | Hourly heat rate                       | scf/hr x Btu/scf x (1 MMBtu / 1,000,000 Btu) |
| 8,760 hr/yr    | Annual operating time                  | Harvest Four Corners                         |
| 2.85 MMscf/yr  | Annual flowrate                        | scf/hr x hr/yr x (1 MMscf / 1,000,000 scf)   |
| 1,235 MMBtu/yr | Annual heat rate                       | MMBtu/hr x hr/yr                             |

**Waste Gas Stream Emission Rates**

| Pollutants                   | Emission Factors <sup>1</sup> | Uncontrolled Emission Rates from Amine Unit <sup>2</sup> |       | Control Efficiencies <sup>4</sup> | Controlled Emission Rates |                       |
|------------------------------|-------------------------------|--|-------|-----------------------------------|---------------------------|-----------------------|
|                              | lb/MMBtu                      | pph  | tpy   | %                                 | pph <sup>5,7,9</sup>      | tpy <sup>6,8,10</sup> |
| NO <sub>x</sub>              | 0.138                         | 0.02   | 0.09  |                                   | 0.02                      | 0.09                  |
| CO                           | 0.370                         | 0.05   | 0.23  |                                   | 0.05                      | 0.23                  |
| SO <sub>2</sub> <sup>3</sup> |                               |  |       |                                   | 1.21                      | 5.33                  |
| H <sub>2</sub> S             |                               | 0.65   | 2.86  | 98                                | 0.01                      | 0.06                  |
| VOC                          |                               | 14.83  | 64.94 | 98                                | 0.30                      | 1.30                  |
| Benzene                      |                               | 1.59   | 6.98  | 98                                | 0.03                      | 0.14                  |
| Toluene                      |                               | 0.73   | 3.21  | 98                                | 0.01                      | 0.06                  |
| Ethylbenzene                 |                               | 0.01   | 0.02  | 98                                | 2.00E-04                  | 4.00E-04              |
| Hexane                       |                               | 0.02   | 0.10  | 98                                | 4.00E-04                  | 2.00E-03              |
| Xylene                       |                               | 0.06   | 0.27  | 98                                | 1.20E-03                  | 0.01                  |
| Total HAPs                   |                               | 2.42   | 10.58 | 98                                | 0.05                      | 0.21                  |

Notes:

<sup>1</sup> NO<sub>x</sub> & CO emission factor taken from Texas Commission on Environmental Quality (TCEQ) February 2012 document "Technical Supplement 4: Flares" for air assisted or unassisted units combusting high-Btu waste streams (>1000 Btu/scf).<sup>2</sup> VOC, HAPs, and H<sub>2</sub>S uncontrolled emissions from the amine unit (in Ethane Rejection Mode) calculated using ProMax.<sup>3</sup> It is assumed 99% of the H<sub>2</sub>S is converted to SO<sub>2</sub>.<sup>4</sup> The flare has a 98% control efficiency.<sup>5</sup> Hourly NO<sub>x</sub> & CO Emission Rates (pph) = lb/MMBtu x (MMBtu/hr / 1,000,000).<sup>6</sup> Annual NO<sub>x</sub> & CO Emission Rates (tpy) = Hourly Emission Rates (pph) x hr/yr x (1 ton / 2,000 lb).<sup>7</sup> Controlled VOC & H<sub>2</sub>S Emission Rate (pph) = Uncontrolled Emission Rate (pph) x (1 - (% / 100)).<sup>8</sup> Controlled VOC & H<sub>2</sub>S Emission Rate (tpy) = Uncontrolled Emission Rate (tpy) x (1 - (% / 100)).<sup>9</sup> Controlled SO<sub>2</sub> Emission Rate (pph) = Uncontrolled H<sub>2</sub>S Emission Rate (pph) x (% / 100) x (32 lb S / 34 lb H<sub>2</sub>S) x (64 lb SO<sub>2</sub> / 32 lb S).<sup>10</sup> Controlled SO<sub>2</sub> Emission Rate (tpy) = Controlled SO<sub>2</sub> Emission Rate (pph) x hr/yr x (1 ton / 2,000 lb).

Harvest Four Corners, LLC - San Juan Gas Plant  
Plant Flare Emissions Calculations

**Combined Emission Rates**

| Pollutants       | Controlled Emission Rates |          |
|------------------|---------------------------|----------|
|                  | pph                       | tpy      |
| NO <sub>x</sub>  | 1.33                      | 5.84     |
| CO               | 3.57                      | 15.64    |
| SO <sub>2</sub>  | 1.21                      | 5.33     |
| H <sub>2</sub> S | 0.01                      | 0.06     |
| VOC              | 1.60                      | 7.02     |
| Benzene          | 0.03                      | 0.14     |
| Toluene          | 0.01                      | 0.06     |
| Ethylbenzene     | 2.00E-04                  | 4.00E-04 |
| Hexane           | 4.00E-04                  | 2.00E-03 |
| Xylene           | 1.20E-03                  | 5.40E-03 |
| Total HAPs       | 0.05                      | 0.21     |

**Exhaust Parameters**

1,832 °F  
2.40 ft  
65.62 fps  
60 ft

Exhaust temperature  
Effective stack diameter  
Stack velocity  
Stack height

NMAQB  
Calculated per NMAQB guidelines  
NMAQB  
Harvest Four Corners

**Flare Effective Diameter**

16.04 lb/lb-mol  
154.70 scfm  
683,981 cal/sec  
552,493 cal/sec  
0.743 meters

Molecular weight  
Flowrate  
Gross heat release  
Effective heat release (qn)  
Effective stack diameter

Molecular weight of CH<sub>4</sub>  
scf/hr / 60 min/hr  
scfm x Btu/scf x 252 cal/Btu / 60 sec/min  
cal/sec x (1-(0.048 x (MW<sup>0.5</sup>)))  
(0.000001 x cal/sec[qn])<sup>0.5</sup>

## Harvest Four Corners, LLC - San Juan Gas Plant Cooling Tower Emissions Calculations

Emission Unit: CT  
Description: Cooling Tower

### COOLING TOWER SPECIFICATIONS:

Enter specifications into blue cells

|                             |            |  |
|-----------------------------|------------|--|
| Drift loss                  | 0.0100%    | Low Efficiency   |
| Circulating water flow rate | 11,520 gpm |  |
| Total dissolved solids      | 1,995 ppm  |  |
| Density of TDS constituents | 2.5 g/cc   | Average density of common salts (CaCO <sub>3</sub> , CaSO <sub>4</sub> , CaCl <sub>2</sub> , NaCl, Na <sub>2</sub> SO <sub>4</sub> , Na <sub>2</sub> CO <sub>3</sub> ) |

Volume of a sphere  $V = 4/3 \pi r^3$

Annual drift 576 lb H<sub>2</sub>O/hr

### PARTICULATE EMISSIONS:

|                             |              |              |
|-----------------------------|--------------|--------------|
| Total Particulate Emissions | 0.360 lbs/hr | 1.575 ton/yr |
| PM <sub>10</sub> Emissions  | 0.145 lbs/hr | 0.635 ton/yr |
| PM <sub>2.5</sub> Emissions | 0.022 lbs/hr | 0.097 ton/yr |

### Water Drop Size Distribution for Low Efficiency Drift Eliminators\*

Based on a drift rate of 0.001%

| Droplet  |        | H <sub>2</sub> O Drople |         | Solids  |          | Emissions |                  |                   |
|----------|--------|-------------------------|---------|---------|----------|-----------|------------------|-------------------|
| Dia.     | % mass | % mass                  | Mass    | Vol.    | Dia.     | PM        | PM <sub>10</sub> | PM <sub>2.5</sub> |
| (micron) |        | smaller                 | (g)     | (cc)    | (micron) | (lb/hr)   | (lb/hr)          | (lb/hr)           |
| 22       | 0.43   | 0.43                    | 5.6E-09 | 4.4E-12 | 2.0      |           |                  |                   |
| 29       | 1.49   | 1.92                    | 1.3E-08 | 1.0E-11 | 2.7      |           |                  | 1.9%              |
| 44       | 3.76   | 5.68                    | 4.5E-08 | 3.6E-11 | 4.1      |           |                  |                   |
| 58       | 2.09   | 7.77                    | 1.0E-07 | 8.2E-11 | 5.4      |           |                  |                   |
| 65       | 1.86   | 9.63                    | 1.4E-07 | 1.1E-10 | 6.0      |           |                  |                   |
| 87       | 1.56   | 11.19                   | 3.4E-07 | 2.8E-10 | 8.1      |           |                  |                   |
| 108      | 1.43   | 12.62                   | 6.6E-07 | 5.3E-10 | 10.0     |           | 12.6%            |                   |
| 120      | 1.26   | 13.88                   | 9.0E-07 | 7.2E-10 | 11.1     |           |                  |                   |
| 132      | 1.09   | 14.97                   | 1.2E-06 | 9.6E-10 | 12.2     |           |                  |                   |
| 144      | 1.32   | 16.29                   | 1.6E-06 | 1.2E-09 | 13.4     |           |                  |                   |
| 174      | 5.81   | 22.1                    | 2.8E-06 | 2.2E-09 | 16.1     |           |                  |                   |
| 300      | 5.04   | 27.14                   | 1.4E-05 | 1.1E-08 | 27.8     |           |                  |                   |
| 450**    | 4.17   | 31.31                   | 4.8E-05 | 3.8E-08 | 41.7     | 31.3%     |                  |                   |
| 600      | 4.01   | 35.32                   | 1.1E-04 | 9.0E-08 | 55.7     |           |                  |                   |
| 750      | 4.00   | 39.32                   | 2.2E-04 | 1.8E-07 | 69.6     |           |                  |                   |
| 900      | 4.03   | 43.35                   | 3.8E-04 | 3.0E-07 | 83.5     |           |                  |                   |
| 1,050    | 4.57   | 47.92                   | 6.1E-04 | 4.8E-07 | 97.4     |           |                  |                   |
| 1,200    | 5.46   | 53.38                   | 9.0E-04 | 7.2E-07 | 111.3    |           |                  |                   |
| 1,350    | 6.80   | 60.18                   | 1.3E-03 | 1.0E-06 | 125.2    |           |                  |                   |
| 2,250    | 17.99  | 78.17                   | 6.0E-03 | 4.8E-06 | 208.7    |           |                  |                   |
| 2,400    | 21.83  | 100                     | 7.2E-03 | 5.8E-06 | 222.6    |           |                  |                   |

\* EPA. 1979. *Effects of Pathogenic and Toxic Material Transport Via Cooling Device Drift* - Vol. 1 Technical Report. EPA-600/7-79-251a. November 1979.

\*\* Maximum droplet size governed by atmospheric dispersion. Larger droplets fall to the ground before evaporating into a particle (EPA 1979).

# Harvest Four Corners, LLC - San Juan Gas Plant

## Cooling Tower Emissions Calculations

Emission Unit: CT  
Description: Cooling Tower

### Water Drop Size Distribution for High Efficiency Drift Eliminators\*

Based on a drift rate of 0.0003%

| Droplet          |                   | H <sub>2</sub> O Droplet | Solids       |                  | Emissions     |                             |                              |
|------------------|-------------------|--------------------------|--------------|------------------|---------------|-----------------------------|------------------------------|
| Dia.<br>(micron) | % mass<br>smaller | Mass<br>(g)              | Vol.<br>(cc) | Dia.<br>(micron) | PM<br>(lb/hr) | PM <sub>10</sub><br>(lb/hr) | PM <sub>2.5</sub><br>(lb/hr) |
| 10               | 0                 | 5.2E-10                  | 4.2E-13      | 0.9              |               |                             |                              |
| 20               | 0.196             | 4.2E-09                  | 3.3E-12      | 1.9              |               |                             |                              |
| 30               | 0.226             | 1.4E-08                  | 1.1E-11      | 2.8              |               |                             | 0.2%                         |
| 40               | 0.514             | 3.4E-08                  | 2.7E-11      | 3.7              |               |                             |                              |
| 50               | 1.816             | 6.5E-08                  | 5.2E-11      | 4.6              |               |                             |                              |
| 60               | 5.702             | 1.1E-07                  | 9.0E-11      | 5.6              |               |                             |                              |
| 70               | 21.348            | 1.8E-07                  | 1.4E-10      | 6.5              |               |                             |                              |
| 90               | 49.812            | 3.8E-07                  | 3.0E-10      | 8.3              |               |                             |                              |
| 110              | 70.509            | 7.0E-07                  | 5.6E-10      | 10.2             |               | 70.5%                       |                              |
| 130              | 82.023            | 1.2E-06                  | 9.2E-10      | 12.1             |               |                             |                              |
| 150              | 88.012            | 1.8E-06                  | 1.4E-09      | 13.9             |               |                             |                              |
| 180              | 91.032            | 3.1E-06                  | 2.4E-09      | 16.7             |               |                             |                              |
| 210              | 92.468            | 4.8E-06                  | 3.9E-09      | 19.5             |               |                             |                              |
| 240              | 94.091            | 7.2E-06                  | 5.8E-09      | 22.3             |               |                             |                              |
| 270              | 94.689            | 1.0E-05                  | 8.2E-09      | 25.0             |               |                             |                              |
| 300              | 96.288            | 1.4E-05                  | 1.1E-08      | 27.8             |               |                             |                              |
| 350              | 97.011            | 2.2E-05                  | 1.8E-08      | 32.5             |               |                             |                              |
| 400              | 98.34             | 3.4E-05                  | 2.7E-08      | 37.1             |               |                             |                              |
| 450**            | 99.071            | 4.8E-05                  | 3.8E-08      | 41.7             | 99.1%         |                             |                              |
| 500              | 99.071            | 6.5E-05                  | 5.2E-08      | 46.4             |               |                             |                              |
| 600              | 100               | 1.1E-04                  | 9.0E-08      | 55.7             |               |                             |                              |

\*Reisman, J. and G. Frisbie. 2002. "Calculating Realistic PM10 Emissions from Cooling Towers."

Environmental Progress & Sustainable Energy. American Institute of Chemical Engineers. Volume 21, Issue 2, pp. 127-130. July 2002.

\*\*Maximum droplet size governed by atmospheric dispersion. Larger droplets fall to the ground before evaporating into a particle (EPA 1979).

### EXAMPLE CALCULATIONS: Low Efficiency

Annual drift:

|                  |             |        |                |   |                    |
|------------------|-------------|--------|----------------|---|--------------------|
| 11,520 gal water | 8.33 lb     | 60 min | 0.010% (drift) | = | 576 lb water drift |
| 1 min            | 1 gal water | 1 hr   |                |   | hr                 |

### Total Particulate Emissions

|              |               |          |   |             |   |              |
|--------------|---------------|----------|---|-------------|---|--------------|
| 576 lb water | 1,995 lb PM   | 31.3% PM | = | 0.360 lb PM | = | 1.575 ton PM |
| hr           | 1E+6 lb water |          |   | hr          |   | yr           |

### PM<sub>10</sub> Emissions

|              |               |                        |   |                           |   |                            |
|--------------|---------------|------------------------|---|---------------------------|---|----------------------------|
| 576 lb water | 1,995 lb PM   | 12.6% PM <sub>10</sub> | = | 0.145 lb PM <sub>10</sub> | = | 0.635 ton PM <sub>10</sub> |
| hr           | 1E+6 lb water |                        |   | hr                        |   | yr                         |

### PM<sub>2.5</sub> Emissions

|              |               |                        |   |                            |   |                             |
|--------------|---------------|------------------------|---|----------------------------|---|-----------------------------|
| 576 lb water | 1,995 lb PM   | 1.9% PM <sub>2.5</sub> | = | 0.022 lb PM <sub>2.5</sub> | = | 0.097 ton PM <sub>2.5</sub> |
| hr           | 1E+6 lb water |                        |   | hr                         |   | yr                          |

# Harvest Four Corners, LLC - San Juan Gas Plant Turbine Exhaust Emissions Calculations

Unit Number: 1-3  
Description: Rolls Royce Avon 1535 Gas Turbines

Note: The data on this worksheet applies to each individual emissions unit identified above.

## Horsepower

|                    |               |                      |
|--------------------|---------------|----------------------|
| 5,600 ft above MSL | Elevation     |                      |
| 23,800 hp          | Nameplate hp  | Mfg. data            |
| 15,000 hp          | Site-rated hp | 2011 NSR application |

## Fuel Consumption

|                    |                         |                                |
|--------------------|-------------------------|--------------------------------|
| 123.2 MMBtu/hr     | Hourly fuel consumption | 2011 NSR application           |
| 1,000 Btu/scf      | Field gas heating value | Nominal heat content           |
| 123,200 scf/hr     | Hourly fuel consumption | MMBtu/hr x 1,000,000 / Btu/scf |
| 8,760 hr/yr        | Annual operating time   | Harvest Four Corners           |
| 1,079,232 MMBtu/yr | Annual fuel consumption | MMBtu/hr x hr/yr               |
| 1,079.23 MMscf/yr  | Annual fuel consumption | scf/hr x hr/yr / 1,000,000     |

## Steady-State Emission Rates

| Pollutants <sup>1,2</sup> | Uncontrolled Emission Rates |                  | Control Efficiencies <sup>4</sup> | Controlled Emission Rates |                  |
|---------------------------|-----------------------------|------------------|-----------------------------------|---------------------------|------------------|
|                           | pph <sup>3</sup>            | tpy <sup>3</sup> | %                                 | pph <sup>5</sup>          | tpy <sup>5</sup> |
| NO <sub>x</sub>           | 56.30                       | 246.59           | --                                | --                        | --               |
| CO                        | 90.00                       | 394.20           | 95                                | 9.60                      | 42.00            |
| VOC                       | 10.00                       | 43.80            | 85                                | 3.00E-01                  | 1.30             |
| SO <sub>2</sub>           | 6.00E-02                    | 2.60E-01         | --                                | --                        | --               |

Notes:

<sup>1</sup> Uncontrolled NO<sub>x</sub> & SO<sub>2</sub> emission rates (pph & tpy) are taken from the 2011 NSR application, as permitted.

<sup>2</sup> Uncontrolled CO & VOC emission rates (pph & tpy) are taken from the manufacturer's data as identified in the 2011 NSR application.

<sup>3</sup> Uncontrolled CO & VOC Emission Rates (tpy) = Uncontrolled CO & VOC Emission Rates (pph) x hr/yr (1 ton / 2,000 lb)

<sup>4</sup> CO & VOC catalyst control efficiencies are taken from the 2011 NSR application.

<sup>5</sup> Controlled CO & VOC emission rates (pph & tpy) are taken from the 2011 NSR application, as permitted.

| Pollutants        | Emission Factors <sup>1</sup> | Uncontrolled Emission Rates |                  |
|-------------------|-------------------------------|-----------------------------|------------------|
|                   | lb/MMBtu                      | pph <sup>2</sup>            | tpy <sup>3</sup> |
| TSP               | 6.60E-03                      | 0.81                        | 3.56             |
| PM <sub>10</sub>  | 6.60E-03                      | 0.81                        | 3.56             |
| PM <sub>2.5</sub> | 6.60E-03                      | 0.81                        | 3.56             |

Notes:

<sup>1</sup> Emission factors taken from AP-42, Table 3.1-2a.

<sup>2</sup> Uncontrolled Emission Rates (pph) = lb/MMBtu x MMBtu/hr

<sup>3</sup> Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr x (1 ton / 2,000 lb)

## Exhaust Parameters

|             |  |   |
|-------------|--|---|
| 370 °F      | Exhaust temperature (Unit 2 & 3)                   | 2011 NSR application                      |
| 750 °F      | Exhaust temperature (Units 1, 2 Bypass & 3 Bypass) | 2011 NSR application                      |
| 46.70 fps   | Stack exit velocity (Unit 1)                       | 2011 NSR application                      |
| 35.20 fps   | Stack exit velocity (Unit 2 & 3)                   | 2011 NSR application                      |
| 133.90 fps  | Stack exit velocity (Unit 2 Bypass & 3 Bypass)     | 2011 NSR application                      |
| 18.90 ft    | Stack exit diameter (Unit 1)                       | 2011 NSR application                      |
| 10.50 ft    | Stack exit diameter (Unit 2 & 3)                   | 2011 NSR application                      |
| 6.50 ft     | Stack exit diameter (Unit 2 Bypass & 3 Bypass)     | 2011 NSR application                      |
| 786,109 cfm | Stack flowrate (Unit 1)                            | fps x 3.1416 x ((ft / 2) ^2) * 60 sec/min |
| 182,879 cfm | Stack flowrate (Unit 2 & 3)                        | fps x 3.1416 x ((ft / 2) ^2) * 60 sec/min |
| 266,593 cfm | Stack flowrate (Unit 2 Bypass & 3 Bypass)          | fps x 3.1416 x ((ft / 2) ^2) * 60 sec/min |
| 56 ft       | Stack height (Unit 1)                              | 2011 NSR application                      |
| 45 ft       | Stack height (Unit 2 & 3)                          | 2011 NSR application                      |

# Harvest Four Corners, LLC - San Juan Gas Plant Turbine Exhaust Emissions Calculations

Unit Number: 6-7  
Description: Solar Centaur T-4501 Gas Turbines

Note: The data on this worksheet applies to each individual emissions unit identified above.

## Horsepower

|                    |               |                      |
|--------------------|---------------|----------------------|
| 5,600 ft above MSL | Elevation     |                      |
| 4,500 hp           | Nameplate hp  | Mfg. data            |
| 3,735 hp           | Site-rated hp | 2011 NSR application |

## Fuel Consumption

|                  |                         |                                |
|------------------|-------------------------|--------------------------------|
| 32.9 MMBtu/hr    | Hourly fuel consumption | 2011 NSR application           |
| 1,000 Btu/scf    | Field gas heating value | Nominal heat content           |
| 32,900 scf/hr    | Hourly fuel consumption | MMBtu/hr x 1,000,000 / Btu/scf |
| 8,760 hr/yr      | Annual operating time   | Harvest Four Corners           |
| 288,204 MMBtu/yr | Annual fuel consumption | MMBtu/hr x hr/yr               |
| 288.20 MMscf/yr  | Annual fuel consumption | scf/hr x hr/yr / 1,000,000     |

## Steady-State Emission Rates

| Pollutants      | Uncontrolled Emission Rates |                  |
|-----------------|-----------------------------|------------------|
|                 | pph <sup>1</sup>            | tpy <sup>1</sup> |
| NO <sub>x</sub> | 15.90                       | 69.80            |
| CO              | 2.30                        | 10.00            |
| VOC             | 0.05                        | 0.24             |
| SO <sub>2</sub> | 0.01                        | 0.05             |

Notes:

<sup>1</sup> Uncontrolled emission rates (pph & tpy) are taken from the 2011 NSR application, as permitted.

| Pollutants        | Emission Factors <sup>1</sup> | Uncontrolled Emission Rates |                  |
|-------------------|-------------------------------|-----------------------------|------------------|
|                   | lb/MMBtu                      | pph <sup>2</sup>            | tpy <sup>3</sup> |
| TSP               | 6.60E-03                      | 0.22                        | 0.95             |
| PM <sub>10</sub>  | 6.60E-03                      | 0.22                        | 0.95             |
| PM <sub>2.5</sub> | 6.60E-03                      | 0.22                        | 0.95             |

Notes:

<sup>1</sup> Emission factors taken from AP-42, Table 3.1-2a.

<sup>2</sup> Uncontrolled Emission Rates (pph) = lb/MMBtu x MMBtu/hr

<sup>3</sup> Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr x (1 ton / 2,000 lb)

## Exhaust Parameters

|            |                     |   |
|------------|---------------------|---|
| 827 °F     | Exhaust temperature | 2011 NSR application                      |
| 100.00 fps | Stack exit velocity | 2011 NSR application                      |
| 3.30 ft    | Stack exit diameter | 2011 NSR application                      |
| 51,318 cfm | Stack flowrate      | fps x 3.1416 x ((ft / 2) ^2) * 60 sec/min |
| 30.8 ft    | Stack height        | 2011 NSR application                      |

# Harvest Four Corners, LLC - San Juan Gas Plant Heater Exhaust Emissions Calculations

Unit Number: 8 & 13  
Description: WILLBROS/INSERV Mole Sieve Regeneration Heaters

Note: The data on this worksheet applies to each individual emissions unit identified above.

## Fuel Consumption

|                  |                         |                                |
|------------------|-------------------------|--------------------------------|
| 14.55 MMBtu/hr   | Capacity                | 2011 NSR application           |
| 1,000 Btu/scf    | Field gas heating value | Nominal heat content           |
| 14,550 scf/hr    | Hourly fuel consumption | MMBtu/hr x 1,000,000 / Btu/scf |
| 8,760 hr/yr      | Annual operating time   | Harvest Four Corners           |
| 127,458 MMBtu/yr | Annual fuel consumption | MMBtu/hr x hr/yr               |
| 127.46 MMscf/yr  | Annual fuel consumption | scf/hr x hr/yr / 1,000,000     |

## Steady-State Emission Rates

| Pollutants      | Emission Factors <sup>1</sup> | Uncontrolled Emission Rates <sup>2</sup> |                  |
|-----------------|-------------------------------|--|------------------|
|                 | lb/MMBtu                      | pph <sup>3</sup>                         | tpy <sup>4</sup> |
| NO <sub>x</sub> | 0.045                         | 0.75                                     | 3.30             |
| CO              | 0.020                         | 0.33                                     | 1.47             |

Notes:

<sup>1</sup> Emission factors taken from the 2011 NSR application

<sup>2</sup> A safety factor of 15% is added to the emission rates

<sup>3</sup> Uncontrolled Emission Rates (pph) = lb/MMBtu x MMBtu/hr x 1.15

<sup>4</sup> Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr x (1 ton / 2,000 lb)

| Pollutants      | Uncontrolled Emission Rates <sup>2</sup> |                  |
|-----------------|--|------------------|
|                 | pph <sup>1</sup>                         | tpy <sup>2</sup> |
| VOC             | 0.03                                     | 0.14             |
| SO <sub>2</sub> | 0.01                                     | 0.04             |

Notes:

<sup>1</sup> VOC & SO<sub>2</sub> emission rates (pph) are taken from the 2011 NSR application, as permitted.

<sup>2</sup> Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr x (1 ton / 2,000 lb)

| Pollutants        | Emission Factors <sup>1</sup> | Uncontrolled Emission Rates |                  |
|-------------------|-------------------------------|-----------------------------|------------------|
|                   | lb/MMscf                      | pph <sup>2</sup>            | tpy <sup>3</sup> |
| TSP               | 7.6                           | 0.11                        | 0.48             |
| PM <sub>10</sub>  | 7.6                           | 0.11                        | 0.48             |
| PM <sub>2.5</sub> | 7.6                           | 0.11                        | 0.48             |

Notes:

<sup>1</sup> Emission factors taken from AP-42, Table 1.4-2, 07/98.

<sup>2</sup> Uncontrolled Emission Rates (pph) = lb/MMscf x (scf/hr / 1,000,000)

<sup>3</sup> Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr x (1 ton / 2,000 lb)

## Exhaust Parameters

|             |                     |   |
|-------------|---------------------|---|
| 664 °F      | Exhaust temperature | 2011 NSR application                      |
| 48.70 fps   | Stack exit velocity | 2011 NSR application                      |
| 3.08 ft     | Stack exit diameter | 2011 NSR application                      |
| 21,771 acfm | Stack flowrate      | fps x 3.1416 x ((ft / 2) ^2) * 60 sec/min |
| 78.3 ft     | Stack height        | 2011 NSR application                      |

# Harvest Four Corners, LLC - San Juan Gas Plant Plant Flare Emissions Calculations

Emission Unit: 9  
Description: High Pressure Flare

## Pilot Gas Stream

|               |                         |                      |
|---------------|-------------------------|----------------------|
| 150 scf/hr    | Pilot gas hour flowrate | Harvest Four Corners |
| 1,050 Btu/scf | Heat content            | Nominal heat content |

## Purge Gas Stream

|               |                         |                      |
|---------------|-------------------------|----------------------|
| 990 scf/hr    | Purge gas hour flowrate | Harvest Four Corners |
| 1,050 Btu/scf | Heat content            | Nominal heat content |

## Combined Gas Stream

|                 |                       |  |
|-----------------|-----------------------|--|
| 1,140 scf/hr    | Hourly flowrate       | Sum of pilot gas & purge gas streams         |
| 1,050 Btu/scf   | Heat content          | Flow weighted average                        |
| 1.20 MMBtu/hr   | Hourly heat rate      | scf/hr x Btu/scf x (1 MMBtu / 1,000,000 Btu) |
| 8,760 hr/yr     | Annual operating time | Harvest Four Corners                         |
| 9.99 MMscf/yr   | Annual flowrate       | scf/hr x hr/yr x (1 MMscf / 1,000,000 scf)   |
| 10,486 MMBtu/yr | Annual heat rate      | MMBtu/hr x hr/yr                             |

## Steady-State Emission Rates

| Pollutants      | Emission Factors <sup>1,2</sup> | Controlled Emission Rates |                  |
|-----------------|---------------------------------|---------------------------|------------------|
|                 | lb/MMBtu                        | pph <sup>3</sup>          | tpy <sup>4</sup> |
| NO <sub>x</sub> | 0.138                           | 0.17                      | 0.72             |
| CO              | 0.370                           | 0.44                      | 1.94             |
| VOC             | 0.140                           | 0.17                      | 0.73             |

Notes:

<sup>1</sup> NO<sub>x</sub> emission factor taken from Texas Commission on Environmental Quality (TCEQ) February 2012 document "Technical Supplement 4: Flares" for air assisted or unassisted units combusting high-Btu waste streams (>1000 Btu/scf).

<sup>2</sup> CO & VOC emission factors taken from AP-42, Table 13.5-1, 09-91

<sup>3</sup> Hourly Emission Rates (pph) = lb/MMBtu x MMBtu/hr

<sup>4</sup> Annual Emission Rates (tpy) = lb/MMBtu x MMBtu/yr x (1 ton/2,000 lb)

## Exhaust Parameters

|           |                          |                                 |
|-----------|--------------------------|---------------------------------|
| 1,832 °F  | Exhaust temperature      | NMAQB                           |
| 0.85 ft   | Effective stack diameter | Calculated per NMAQB guidelines |
| 65.62 fps | Stack velocity           | NMAQB                           |
| 200 ft    | Stack height             | Harvest Four Corners            |

## Flare Effective Diameter

|                 |                             |  |
|-----------------|-----------------------------|--|
| 16.04 lb/lb-mol | Molecular weight            | Molecular weight of CH <sub>4</sub>          |
| 19.00 scfm      | Flowrate                    | scf/hr / 60 min/hr                           |
| 83,790 cal/sec  | Gross heat release          | scfm x Btu/scf x 252 cal/Btu / 60 sec/min    |
| 67,682 cal/sec  | Effective heat release (qn) | cal/sec x (1-(0.048 x (MW <sup>0.5</sup> ))) |
| 0.26 meters     | Effective stack diameter    | (0.000001 x cal/sec[qn]) <sup>0.5</sup>      |

# Harvest Four Corners, LLC - San Juan Gas Plant Heater Exhaust Emissions Calculations

Unit Number: 12  
Description: Broach Mole Seive Regeneration Heater

Note: The data on this worksheet applies to each individual emissions unit identified above.

## Fuel Consumption

|                 |                         |                                |
|-----------------|-------------------------|--------------------------------|
| 3.40 MMBtu/hr   | Capacity                | 2011 NSR application           |
| 1,000 Btu/scf   | Field gas heating value | Nominal heat content           |
| 3,400 scf/hr    | Hourly fuel consumption | MMBtu/hr x 1,000,000 / Btu/scf |
| 8,760 hr/yr     | Annual operating time   | Harvest Four Corners           |
| 29,784 MMBtu/yr | Annual fuel consumption | MMBtu/hr x hr/yr               |
| 29.78 MMscf/yr  | Annual fuel consumption | scf/hr x hr/yr / 1,000,000     |

## Steady-State Emission Rates

| Pollutants        | Emission Factors <sup>1</sup> | Uncontrolled Emission Rates |                  |
|-------------------|-------------------------------|-----------------------------|------------------|
|                   | lb/MMscf                      | pph <sup>2</sup>            | tpy <sup>3</sup> |
| NO <sub>x</sub>   | 100                           | 0.34                        | 1.49             |
| VOC               | 5.5                           | 0.02                        | 0.08             |
| TSP               | 7.6                           | 0.03                        | 0.11             |
| PM <sub>10</sub>  | 7.6                           | 0.03                        | 0.11             |
| PM <sub>2.5</sub> | 7.6                           | 0.03                        | 0.11             |

Notes:

<sup>1</sup> Emission factors taken from AP-42, Tables 1.4-1 & 1.4-2, 07/98.

<sup>2</sup> Uncontrolled Emission Rates (pph) = lb/MMscf x (scf/hr / 1,000,000)

<sup>3</sup> Uncontrolled Emission Rates (tpy) = Uncontrolled Emission Rates (pph) x hr/yr x (1 ton / 2,000 lb)

| Pollutants      | Uncontrolled Emission Rates <sup>1</sup> |      |
|-----------------|--|------|
|                 | pph                                      | tpy  |
| CO              | 0.10                                     | 0.30 |
| SO <sub>2</sub> | 0.01                                     | 0.01 |

Notes:

<sup>1</sup> Emission rates (pph & tpy) are taken from the 2011 NSR application, as permitted.

## Exhaust Parameters

|            |                     |   |
|------------|---------------------|---|
| 550 °F     | Exhaust temperature | 2011 NSR application                      |
| 14.30 fps  | Stack exit velocity | 2011 NSR application                      |
| 1.50 ft    | Stack exit diameter | 2011 NSR application                      |
| 1,516 acfm | Stack flowrate      | fps x 3.1416 x ((ft / 2) ^2) * 60 sec/min |
| 15.3 ft    | Stack height        | 2011 NSR application                      |

Harvest Four Corners, LLC - San Juan Gas Plant  
Equipment Leaks Emissions Calculations

Unit Number: 14  
Description: Equipment Leaks

## Steady-State Emission Rates

| Equipment <sup>3,4</sup>                   | Number of Components <sup>1</sup><br># of sources | Emission Factors <sup>5</sup><br>kg/hr/source | VOC Content <sup>6</sup><br>% | Uncontrolled VOC Emission Rates |                  | Control Efficiency <sup>9</sup><br>% | Controlled VOC Emission Rates |                   |
|--|---|---|-------------------------------|---------------------------------|------------------|--------------------------------------|-------------------------------|-------------------|
|  |   |   |                               | pph <sup>7</sup>                | tpy <sup>8</sup> |                                      | pph <sup>10</sup>             | tpy <sup>11</sup> |
| Valves (inlet gas)                         | 2135  | 4.50E-03                                      | 5                             | 1.06                            | 4.63             | 67                                   | 0.35                          | 1.53              |
| Valves (natural gas liquids)               | 2135  | 2.50E-03                                      | 100                           | 11.74                           | 51.43            | 61                                   | 4.58                          | 20.06             |
| Valves (residue gas)                       | 0   | 4.50E-03                                      | 1                             | 0.00                            | 0.00             | 67                                   | 0.00                          | 0.00              |
| Connectors (inlet gas)                     | 0   | 2.00E-04                                      | 5                             | 0.00                            | 0.00             | 0                                    | 0.00                          | 0.00              |
| Connectors (natural gas liquids)           | 0   | 2.10E-04                                      | 100                           | 0.00                            | 0.00             | 0                                    | 0.00                          | 0.00              |
| Connectors (residue gas)                   | 0   | 2.00E-04                                      | 1                             | 0.00                            | 0.00             | 0                                    | 0.00                          | 0.00              |
| Pump Seals (inlet gas)                     | 22  | 2.40E-03                                      | 5                             | 0.01                            | 0.03             | 0                                    | 0.01                          | 0.03              |
| Pump Seals (natural gas liquids)           | 22  | 1.30E-02                                      | 100                           | 0.63                            | 2.76             | 45                                   | 0.35                          | 1.52              |
| Pump Seals (residue gas)                   | 0   | 2.40E-03                                      | 1                             | 0.00                            | 0.00             | 0                                    | 0.00                          | 0.00              |
| Flanges (inlet gas) <sup>2</sup>           | 2135  | 3.90E-04                                      | 5                             | 0.09                            | 0.40             | 0                                    | 0.09                          | 0.40              |
| Flanges (natural gas liquids) <sup>2</sup> | 4269  | 1.10E-04                                      | 100                           | 1.03                            | 4.52             | 0                                    | 1.03                          | 4.52              |
| Flanges (residue gas) <sup>2</sup>         | 2135  | 3.90E-04                                      | 1                             | 0.02                            | 0.08             | 0                                    | 0.02                          | 0.08              |
| Open Lines (inlet gas)                     | 0   | 2.00E-03                                      | 5                             | 0.00                            | 0.00             | 0                                    | 0.00                          | 0.00              |
| Open Lines (natural gas liquids)           | 0   | 1.40E-03                                      | 100                           | 0.00                            | 0.00             | 0                                    | 0.00                          | 0.00              |
| Open Lines (residue gas)                   | 0   | 2.00E-03                                      | 1                             | 0.00                            | 0.00             | 0                                    | 0.00                          | 0.00              |
| Other (inlet gas)                          | 66  | 8.80E-03                                      | 5                             | 0.06                            | 0.28             | 0                                    | 0.06                          | 0.28              |
| Other (natural gas liquids)                | 132   | 7.50E-03                                      | 100                           | 2.18                            | 9.54             | 0                                    | 2.18                          | 9.54              |
| Other (residue gas)                        | 66  | 8.80E-03                                      | 1                             | 0.01                            | 0.06             | 0                                    | 0.01                          | 0.06              |
| <b>Total</b>                               |   |   |                               | <b>16.83</b>                    | <b>73.72</b>     |                                      | <b>8.68</b>                   | <b>38.01</b>      |

## Notes:

<sup>1</sup> Number of fittings provided by Harvest Four Corners.

<sup>2</sup> Number of flanges assumed to be two times the valve count.

<sup>3</sup> Fittings assumed to be 50% gas and 50% light liquids.

<sup>4</sup> Gas fittings assumed to be 50% inlet gas and 50% residue gas.

<sup>5</sup> Emission factors taken from the EPA "1995 Protocol for Equipment Leak Emission Estimates", Table 2-4, Oil and Gas Production Operations Average Emission Factors (kg/hr/source).

<sup>6</sup> The VOC content is estimated.

<sup>7</sup> Uncontrolled VOC Emission Rates (pph) = Uncontrolled Emission Rates (tpy) x 2,000 lb/ton / 8,760 hr/yr

<sup>8</sup> Uncontrolled VOC Emission Rates (tpy) = kg/hr/source x 2.2 lb/kg x # of sources x (% / 100) x 8,760 hr/yr x (1 ton / 2,000 lb).

<sup>9</sup> Control efficiencies taken from the EPA "1995 Protocol for Equipment Leak Emission Estimates", Table 5-2, Control Effectiveness For An LDAR Program At A SOCMI Process Unit. Quarterly monitoring 10,000 ppmv leak definition is assumed.

<sup>10</sup> Controlled VOC Emission Rates (pph) = Uncontrolled Emission Rates (pph) x (1-(% / 100)).

<sup>11</sup> Controlled VOC Emission Rates (tpy) = Uncontrolled Emission Rates (tpy) x (1-(% / 100)).

| Pollutants   | Weight Percent <sup>1</sup><br>% | Controlled HAP Emission Rates |                  |
|--------------|----------------------------------|-------------------------------|------------------|
|              |                                  | pph <sup>2</sup>              | tpy <sup>3</sup> |
| Benzene      | 0.0756                           | 6.56E-03                      | 0.03             |
| Ethylbenzene | 0.0000                           | 0.00                          | 0.00             |
| n-Hexane     | 0.4143                           | 0.04                          | 0.16             |
| Toluene      | 0.1196                           | 0.01                          | 0.05             |
| Xylenes      | 0.0306                           | 2.66E-03                      | 0.01             |

## Notes:

<sup>1</sup> Weight percents calculated from San Juan Gas Plant gas analysis sampled 09/01/2016.

<sup>2</sup> Controlled HAP Emission Rates (pph) = Controlled VOC Emission Rate (pph) x (% / 100).

<sup>3</sup> Controlled HAP Emission Rates (tpy) = Controlled VOC Emission Rate (tpy) x (% / 100).

**Harvest Four Corners, LLC - San Juan Gas Plant  
Green House Gas Emissions Data and Calculations**

| Sources                        | Facility Total Emissions |            |            |            |             |
|--------------------------------|--------------------------|------------|------------|------------|-------------|
|                                | CO2<br>tpy               | CH4<br>tpy | N2O<br>tpy | GHG<br>tpy | CO2e<br>tpy |
| Turbine Exhaust                | 256,256.62               | 4.83       | 4.83E-01   | 256,261.94 | 256,521.28  |
| Centrifugal Compressor Venting | 1.96                     | 36.71      | --         | 38.67      | 919.76      |
| Heater & Oxidizer Exhaust      | 22,752.23                | 4.29E-01   | 4.29E-02   | 22,752.71  | 22,775.73   |
| Flares                         | 5,594.23                 | 28.98      | 9.32E-03   | 5,623.22   | 6,321.54    |
| Equipment Leaks                | 8.87                     | 166.37     | --         | 175.24     | 4,168.03    |
| SSM and Malfunctions           | 2.33                     | 43.77      |            |            |             |
| Total                          | 284,613.92               | 237.32     | 5.35E-01   | 284,851.77 | 290,706.35  |

**Turbine Exhaust Emissions**

| Unit Numbers | Description            | Emission Factors <sup>1</sup> |                 |                 | Emission Rates <sup>2</sup> |            |            |
|--------------|------------------------|-------------------------------|-----------------|-----------------|-----------------------------|------------|------------|
|              |                        | CO2<br>kg/MMBtu               | CH4<br>kg/MMBtu | N2O<br>kg/MMBtu | CO2<br>tpy                  | CH4<br>tpy | N2O<br>tpy |
| 1            | 1535 Turbine           | 53.06                         | 1.00E-03        | 1.00E-04        | 62,990.45                   | 1.19       | 1.19E-01   |
| 2            | 1535 Turbine           | 53.06                         | 1.00E-03        | 1.00E-04        | 62,990.45                   | 1.19       | 1.19E-01   |
| 3            | 1535 Turbine           | 53.06                         | 1.00E-03        | 1.00E-04        | 62,990.45                   | 1.19       | 1.19E-01   |
| 4            | Centaur T-4501 Turbine | 53.06                         | 1.00E-03        | 1.00E-04        | 16,821.31                   | 3.17E-01   | 3.17E-02   |
| 5            | Centaur T-4501 Turbine | 53.06                         | 1.00E-03        | 1.00E-04        | 16,821.31                   | 3.17E-01   | 3.17E-02   |
| 6            | Centaur T-4501 Turbine | 53.06                         | 1.00E-03        | 1.00E-04        | 16,821.31                   | 3.17E-01   | 3.17E-02   |
| 7            | Centaur T-4501 Turbine | 53.06                         | 1.00E-03        | 1.00E-04        | 16,821.31                   | 3.17E-01   | 3.17E-02   |
| Total        |                        |                               |                 |                 | 256,256.62                  | 4.83       | 4.83E-01   |

Notes:

<sup>1</sup> The emissions factors are taken from 40 CFR 98, Subpart C, Tables C-1 & C-2.

<sup>2</sup> Emission Rates (tpy) = kg/MMBtu x 2.2 lb/kg x MMBtu/yr / 2,000 lb/ton.

| Unit Numbers | Description            | Fuel Types <sup>1</sup> | Operating<br>Times <sup>1</sup><br>hr/yr | Design Heat<br>Rates <sup>2</sup><br>MMBtu/hr | Fuel Usages <sup>3</sup> |
|--------------|------------------------|-------------------------|--|---|--------------------------|
|              |                        |                         |  |   | MMBtu/yr                 |
| 1            | 1535 Turbine           | Nat. Gas                | 8,760                                    | 123.20  | 1,079,232                |
| 2            | 1535 Turbine           | Nat. Gas                | 8,760                                    | 123.20  | 1,079,232                |
| 3            | 1535 Turbine           | Nat. Gas                | 8,760                                    | 123.20  | 1,079,232                |
| 4            | Centaur T-4501 Turbine | Nat. Gas                | 8,760                                    | 32.90   | 288,204                  |
| 5            | Centaur T-4501 Turbine | Nat. Gas                | 8,760                                    | 32.90   | 288,204                  |
| 6            | Centaur T-4501 Turbine | Nat. Gas                | 8,760                                    | 32.90   | 288,204                  |
| 7            | Centaur T-4501 Turbine | Nat. Gas                | 8,760                                    | 32.90   | 288,204                  |

Notes:

<sup>1</sup> The fuel types and operating times are provided by Harvest Four Corners

<sup>2</sup> The design heat rates are taken from 2011 NSR application.

<sup>3</sup> Fuel Usages (MMBtu/yr) = Design Heat Rates (MMBtu/hr) x hr/yr.

**Harvest Four Corners, LLC - San Juan Gas Plant  
Green House Gas Emissions Data and Calculations**

**Centrifugal Compressor Venting Emissions**

| Unit Numbers | Description     | Emission Rates <sup>1,2</sup> |                         |
|--------------|-----------------|-------------------------------|-------------------------|
|              |                 | CO2<br>tpy <sup>3</sup>       | CH4<br>tpy <sup>4</sup> |
| 1            | Wet Seal        | 5.95E-01                      | 11.16                   |
| 1            | Blowdown Valve  | --                            | --                      |
| 1            | Isolation Valve | --                            | --                      |
| 2            | Wet Seal        | 5.95E-01                      | 11.16                   |
| 2            | Blowdown Valve  | --                            | --                      |
| 2            | Isolation Valve | --                            | --                      |
| 3            | Wet Seal        | 5.95E-01                      | 11.16                   |
| 3            | Blowdown Valve  | --                            | --                      |
| 3            | Isolation Valve | --                            | --                      |
| 4            | Wet Seal        | --                            | --                      |
| 4            | Blowdown Valve  | 0.00E+00                      | 0.00                    |
| 4            | Isolation Valve | 8.57E-02                      | 1.61                    |
| 5            | Wet Seal        | --                            | --                      |
| 5            | Blowdown Valve  | 0.00E+00                      | 0.00                    |
| 5            | Isolation Valve | 8.57E-02                      | 1.61                    |
| Total        |                 | 1.96                          | 36.71                   |

Notes:

<sup>1</sup> A combination of equations W-22 & W-36 (Subpart W) is used to calculate centrifugal compressor emissions.

<sup>2</sup> As the NMED requires CO2 & CH4 emissions rather than CO2e emissions, it is not necessary to include the global warming potential from equation W-36.

<sup>3</sup> CO2 Emission Rates (tpy) = scf/hr x hr/yr x (CO2 Mole Percent (%) / 100) x CO2 Density (kg/scf) x (2,204.6 lb/tonne / 2,000 lb/ton) / 1,000 kg/tonne

<sup>4</sup> CH4 Emission Rates (tpy) = scf/hr x hr/yr x (CH4 Mole Percent (%) / 100) x CH4 Density (kg/scf) x (2,204.6 lb/tonne / 2,000 lb/ton) / 1,000 kg/tonne

| Unit Numbers <sup>4,5</sup> | Description <sup>1,2</sup> | Gas<br>Emissions <sup>3</sup><br>scf/hr | Operating<br>Times <sup>6</sup><br>hr/yr | CO2 Mole<br>Percents <sup>7</sup><br>% | CH4 Mole<br>Percents <sup>7</sup><br>% | CO2<br>Density <sup>8</sup><br>kg/scf | CH4<br>Density <sup>8</sup><br>kg/scf |
|-----------------------------|----------------------------|---|--|--|--|---------------------------------------|---------------------------------------|
| 1                           | Wet Seal                   | 70.81                                   | 8760                                     | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 1                           | Blowdown Valve             | 0.64                                    | 0  | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 1                           | Isolation Valve            | 10.21                                   | 0  | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 2                           | Wet Seal                   | 70.81                                   | 8760                                     | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 2                           | Blowdown Valve             | 0.64                                    | 0  | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 2                           | Isolation Valve            | 10.21                                   | 0  | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 3                           | Wet Seal                   | 70.81                                   | 8760                                     | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 3                           | Blowdown Valve             | 0.64                                    | 0  | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 3                           | Isolation Valve            | 10.21                                   | 0  | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 4                           | Wet Seal                   | 70.81                                   | 0  | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 4                           | Blowdown Valve             | 0.64                                    | 0  | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 4                           | Isolation Valve            | 10.21                                   | 8760                                     | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 5                           | Wet Seal                   | 70.81                                   | 0  | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 5                           | Blowdown Valve             | 0.64                                    | 0  | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |
| 5                           | Isolation Valve            | 10.21                                   | 8760                                     | 1.65                                   | 85.04                                  | 0.0526                                | 0.0192                                |

Notes:

<sup>1</sup> Operating mode - includes blowdown valve leakage (wet and dry seal) and the oil degassing vents (wet seal).

<sup>2</sup> Non-operating depressurized mode - includes isolation valve leakage (wet & dry seal) through open blowdown vents (without blind flanges).

<sup>3</sup> Emission factors are the three year rolling average of measurements taken by Harvest Four Corners.

<sup>4</sup> Units 1-3 blowdown valve and isolation valve leakage are sent to the flare.

<sup>5</sup> Units 4 & 5 do not have wet seals.

<sup>6</sup> The operating times are estimated so as to identify the highest GHG emission rates.

<sup>7</sup> The facility CO2 and CH4 contents are taken from the facility inlet gas composition.

<sup>8</sup> The CO2 & CH4 densities (kg/scf) are taken from Subpart W, Paragraph 98.233(v).

**Harvest Four Corners, LLC - San Juan Gas Plant  
Green House Gas Emissions Data and Calculations**

**Heater & Oxidizer Exhaust Emissions**

| Unit Numbers | Description         | Emission Factors <sup>1</sup> |                 |                 | Emission Rates <sup>2</sup> |            |            |
|--------------|---------------------|-------------------------------|-----------------|-----------------|-----------------------------|------------|------------|
|              |                     | CO2<br>kg/MMBtu               | CH4<br>kg/MMBtu | N2O<br>kg/MMBtu | CO2<br>tpy                  | CH4<br>tpy | N2O<br>tpy |
| 8            | Regeneration Heater | 53.06                         | 1.00E-03        | 1.00E-04        | 7,439.21                    | 1.40E-01   | 1.40E-02   |
| 12           | Regeneration Heater | 53.06                         | 1.00E-03        | 1.00E-04        | 1,738.37                    | 3.28E-02   | 3.28E-03   |
| 13           | Regeneration Heater | 53.06                         | 1.00E-03        | 1.00E-04        | 7,439.21                    | 1.40E-01   | 1.40E-02   |
| 15           | Thermal Oxidizer    | 53.06                         | 1.00E-03        | 1.00E-04        | 6,135.43                    | 1.16E-01   | 1.16E-02   |
|              | Total               |                               |                 |                 | 22,752.23                   | 4.29E-01   | 4.29E-02   |

Notes:

<sup>1</sup> The emissions factors are taken from 40 CFR 98, Subpart C, Tables C-1 & C-2.

<sup>2</sup> Emission Rates (tpy) = kg/MMBtu x 2.2 lb/kg x MMBtu/yr / 2,000 lb/ton.

| Unit Numbers | Description         | Fuel Types <sup>1</sup> | Operating<br>Times <sup>1</sup><br>hr/yr | Design Heat<br>Rates <sup>2</sup><br>MMBtu/hr | Fuel Usages <sup>3</sup> |
|--------------|---------------------|-------------------------|--|---|--------------------------|
|              |                     |                         |  |   | MMBtu/yr                 |
| 8            | Regeneration Heater | Nat. Gas                | 8,760                                    | 123.20  | 127,458                  |
| 12           | Regeneration Heater | Nat. Gas                | 8,760                                    | 123.20  | 29,784                   |
| 13           | Regeneration Heater | Nat. Gas                | 8,760                                    | 32.90   | 127,458                  |
| 15           | Thermal Oxidizer    | Nat. Gas                | 8,760                                    | 32.90   | 105,120                  |

Notes:

<sup>1</sup> The fuel types and operating times are provided by Harvest Four Corners

<sup>2</sup> The design heat rates are taken from 2011 NSR application.

<sup>3</sup> Fuel Usages (MMBtu/yr) = Design Heat Rates (MMBtu/hr) x hr/yr.

**Harvest Four Corners, LLC - San Juan Gas Plant  
Green House Gas Emissions Data and Calculations**

**Facility Flare Emissions**

| Unit Numbers | Description         | N2O<br>Emission<br>Factor<br>kg/MMBtu | Emission Rates <sup>2</sup> |            |            |
|--------------|---------------------|---------------------------------------|-----------------------------|------------|------------|
|              |                     |                                       | CO2<br>tpy                  | CH4<br>tpy | N2O<br>tpy |
| 9            | High Pressure Flare | 1.00E-04                              | 692.43                      | 3.59       | 1.15E-03   |
| 16           | Low Pressure Flare  | 1.00E-04                              | 5,686.55                    | 29.46      | 8.17E-03   |
|              | Total               |                                       | 6,378.99                    | 33.05      | 9.32E-03   |

Notes:

<sup>1</sup> The N2O emission factor is obtained from Subpart W (Paragraph 98.233(z)(2)(vi)).

<sup>2</sup> CO2 Emission Rates (tpy) = (Noncombustion CO2 Emissions (MMscf/yr) + Combustion CO2 Emissions (MMscf/yr)) x 1,000,000 scf/MMscf x 0.0526 kg/cu ft x 2.2 lb/kg / 2,000 lb/ton.

<sup>3</sup> CH4 Emission Rates (tpy) = Noncombustion CH4 Emissions (MMscf/yr) x 1,000,000 scf/MMscf x 0.0192 kg/cu ft x 2.2 lb/kg / 2,000 lb/ton.

<sup>4</sup> N2O Emission Rates (tpy) = kg/MMBtu x 2.2 lb/kg x MMBtu/yr / 2,000 lb/ton.

| Unit Numbers | Description         | Facility<br>Flare<br>Through-<br>put <sup>1</sup><br>MMscf/yr | HHV Heat<br>Content<br>Btu/scf | Flare Through-<br>put <sup>2</sup><br>MMBtu/hr | Control<br>Efficiency <sup>3</sup><br>% | Non-<br>combustion<br>CO2<br>Emissions <sup>4</sup><br>MMscf/yr | Combustion<br>CO2<br>Emissions <sup>5,6</sup><br>MMscf/yr | Non-<br>combustion<br>CH4<br>Emissions <sup>7</sup><br>MMscf/yr |
|--------------|---------------------|---|--------------------------------|--|---|---|---|---|
| 9            | High Pressure Flare | 9.99  | 1050                           | 10,486   | 98                                      | 0.16  | 11.80   | 0.17  |
| 16           | Low Pressure Flare  | 82.01   | 1050                           | 74,228   | 98                                      | 1.35  | 96.93   | 1.39  |

Notes:

<sup>1</sup> The facility flare throughput and heat content is calculated (see individual flare calculation sheets).

<sup>2</sup> Flare Throughput (MMBtu/yr) = MMscf/yr x 1,000,000 scf/MMscf x Btu/scf / 1,000,000 Btu/MMBtu

<sup>3</sup> The control efficiency is the default value identified by Subpart W (Paragraph 98.233(n)(4)).

<sup>4</sup> Noncombustion CO2 Emissions (MMscf/yr) = MMscf/yr x (CO2 Content (mole %) / 100).

<sup>5</sup> Combustion CO2 Emissions (MMscf/yr) = [(Control Efficiency (%) / 100) x MMscf/yr x (CH4 Content (mole %) / 100) x 1]  
+ [(Control Efficiency (%) / 100) x MMscf/yr x (Ethane Content (mole %) / 100) x 2]  
+ [(Control Efficiency (%) / 100) x MMscf/yr x (Propane Content (mole %) / 100) x 3]  
+ [(Control Efficiency (%) / 100) x MMscf/yr x (Butane Content (mole %) / 100) x 4]  
+ [(Control Efficiency (%) / 100) x MMscf/yr x (Pentane+ Content (mole %) / 100) x 5]

<sup>6</sup> The numbers 1-5 in the above equation represent the number of carbon atoms found in methane through pentane, respectively.

<sup>7</sup> Noncombustion CH4 Emissions (MMscf/yr) = MMscf/yr x (1 - (Control Efficiency (%) / 100)) x (CH4 Content (mole %) / 100)

| Unit Numbers | Description         | CO2<br>Content <sup>1</sup><br>mole % | CH4<br>Content <sup>1</sup><br>mole % | Ethane<br>Content <sup>1</sup><br>mole % | Propane<br>Content <sup>1</sup><br>mole % | Butane<br>Content <sup>1</sup><br>mole % | Pentane+<br>Content <sup>1</sup><br>mole % |
|--------------|---------------------|---------------------------------------|---------------------------------------|--|---|--|--|
| 9            | High Pressure Flare | 1.65                                  | 85.04                                 | 7.37                                     | 3.16                                      | 1.44                                     | 1.11                                       |
| 16           | Low Pressure Flare  | 1.65                                  | 85.04                                 | 7.37                                     | 3.16                                      | 1.44                                     | 1.11                                       |

Notes:

<sup>1</sup> The facility flare mole % is obtained from the facility inlet gas analysis.

### Harvest Four Corners, LLC - San Juan Gas Plant Green House Gas Emissions Data and Calculations

#### Equipment Leaks Emissions

| Description                              | Emission Rates <sup>4</sup> |                                     |                                     |
|--|-----------------------------|-------------------------------------|-------------------------------------|
|  | VOC <sup>1</sup><br>tpy     | CO <sub>2</sub> <sup>2</sup><br>tpy | CH <sub>4</sub> <sup>3</sup><br>tpy |
| Valves, connectors, seals, flanges, etc. | 38.01                       | 8.87                                | 166.37                              |

Notes:

<sup>1</sup> The VOC emission rate is taken from the equipment leaks emissions calculations worksheet.

<sup>2</sup> CO<sub>2</sub> Emission Rates (tpy) = VOC Emission Rate (tpy) x CO<sub>2</sub> Weight Percent of Total (%) / VOC Weight Percent of Total (%).

<sup>3</sup> CH<sub>4</sub> Emission Rates (tpy) = VOC Emission Rate (tpy) x CH<sub>4</sub> Weight Percent of Total (%) / VOC Weight Percent of Total (%).

<sup>4</sup> CO<sub>2</sub>, CH<sub>4</sub> & VOC weight percent of totals obtained from gas stream composition calculations.

#### SSM and Malfunction Emissions

| Description                              | Emission Rates <sup>4</sup> |                                     |                                     |
|--|-----------------------------|-------------------------------------|-------------------------------------|
|  | VOC <sup>1</sup><br>tpy     | CO <sub>2</sub> <sup>2</sup><br>tpy | CH <sub>4</sub> <sup>3</sup><br>tpy |
| Valves, connectors, seals, flanges, etc. | 10.00                       | 2.33                                | 43.77                               |

Notes:

<sup>1</sup> The VOC emission rate is taken from the current Title V permit.

<sup>2</sup> CO<sub>2</sub> Emission Rates (tpy) = VOC Emission Rate (tpy) x CO<sub>2</sub> Weight Percent of Total (%) / VOC Weight Percent of Total (%).

<sup>3</sup> CH<sub>4</sub> Emission Rates (tpy) = VOC Emission Rate (tpy) x CH<sub>4</sub> Weight Percent of Total (%) / VOC Weight Percent of Total (%).

<sup>4</sup> CO<sub>2</sub>, CH<sub>4</sub> & VOC weight percent of totals obtained from gas stream composition calculations.

#### Gas Stream Composition

| Components     | Mole<br>Percents <sup>1</sup><br>% | Molecular<br>Weights<br>lb/lb-mole | Component<br>Weights <sup>2</sup><br>lb/lb-mole | Weight<br>Percent of<br>Total <sup>3</sup><br>% | Emission<br>Factors <sup>4</sup><br>lb/scf |
|----------------|------------------------------------|------------------------------------|---|---|--|
| Carbon Dioxide | 1.6534                             | 44.01                              | 0.73  | 3.6819  | 0.0019                                     |
| Nitrogen       | 0.2179                             | 28.01                              | 0.06  | 0.3088  | 0.0002                                     |
| Methane        | 85.0411                            | 16.04                              | 13.64   | 69.0202   | 0.0360                                     |
| Ethane         | 7.3744                             | 30.07                              | 2.22  | 11.2203   | 0.0058                                     |
| Propane        | 3.1599                             | 44.09                              | 1.39  | 7.0495  | 0.0037                                     |
| IsoButane      | 0.5963                             | 58.12                              | 0.35  | 1.7536  | 0.0009                                     |
| Normal Butane  | 0.8422                             | 58.12                              | 0.49  | 2.4768  | 0.0013                                     |
| IsoPentane     | 0.3098                             | 72.15                              | 0.22  | 1.1310  | 0.0006                                     |
| Normal Pentane | 0.2226                             | 72.15                              | 0.16  | 0.8127  | 0.0004                                     |
| C6+            | 0.4369                             | 86.18                              | 0.38  | 1.9052  | 0.0010                                     |
| Benzene        | 0.0191                             | 78.11                              | 0.01  | 0.0755  | 0.0000                                     |
| Ethylbenzene   | 0.0000                             | 106.17                             | 0.00  | 0.0000  | 0.0000                                     |
| n-Hexane       | 0.0950                             | 86.17                              | 0.08  | 0.4142  | 0.0002                                     |
| Toluene        | 0.0257                             | 92.14                              | 0.02  | 0.1198  | 0.0001                                     |
| Xylenes        | 0.0057                             | 106.17                             | 0.01  | 0.0306  | 0.0000                                     |
| Total          | 100.0000                           |                                    | 19.76   | 100.0000  | 0.0521                                     |
| VOC            |                                    |                                    | 3.12  | 15.7688   | 0.0082                                     |

Notes:

<sup>1</sup> Gas stream composition obtained from San Juan Gas Plant gas analysis dated 08/01/2016.

<sup>2</sup> Component Weights (lb/lb-mole) = [Mole Percents (%) / 100] x Molecular Weights (lb/lb-mole)

<sup>3</sup> Weight Percent of Total (%) = 100 x Component Weights (lb/lb-mole) / Total Component Weight (lb/lb-mole)

<sup>4</sup> Emission Factors (lb/scf) = [Mole Percents (%) / 100] x Molecular Weights (lb/lb-mole) / 379.4 scf/lb-mole

# Section 7

## Information Used to Determine Emissions

---

**Information Used to Determine Emissions** shall include the following:

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

**Amine Vent (Unit: Amine Unit)**

- ProMax

**Thermal Oxidizer (Unit: 15)**

- AP-42 Tables 1.4-1 and 1.4-2
- ProMax streams for HAP, VOC, and H<sub>2</sub>S
- 40 CFR Part 98 methodology

**Flares (Units: 9 & 16)**

- Emission factors from TCEQ document "Technical Supplement 4: Flares" for air assisted or unassisted
- units combusting high-Btu waste streams (>1000 Btu/scf), February 2012.
- ProMax streams for HAP, VOC, and H<sub>2</sub>S
- 40 CFR Part 98 methodology

**Cooling Tower (Unit: CT)**

- Manufacturer data

**Turbines (Units: 1-3, 6, & 7)**

- AP-42 Tables 3.1-2a
- GRI-HAPCalc 3.01
- 40 CFR Part 98 methodology

**Turbines (Units: 4 & 5)**

- AP-42 Tables 3.1-2a and Table 3.1-3.
- Manufacturer Specifications
- 40 CFR Part 98 methodology

**Heaters (Units: 8, 12, & 13)**

- AP-42 Tables 1.4-1 and 1.4-2
- GRI-HAPCalc 3.01
- 40 CFR Part 98 methodology

**Fugitives (Unit: 14)**

- Tables 2-4 and 5-2 of the EPA Protocol for Equipment Leak Emission Estimates, November 1995
- Inlet gas and liquid analysis for San Juan Gas Plant dated 09/01/2016

Information related to requested modification

|                                     |                              |
|-------------------------------------|------------------------------|
| Customer<br><b>Hilcorp San Juan</b> |                              |
| Job ID<br><b>4701S Upgrade</b>      |                              |
| Inquiry Number                      |                              |
| Run By<br><b>Jose Guillen</b>       | Date Run<br><b>15-Aug-23</b> |

|  |                              |
|--|------------------------------|
| Engine Model<br><b>CENTAUR 40-4700S</b><br><b>GSC STANDARD</b> |                              |
| Fuel Type<br><b>SD NATURAL GAS</b>                             | Water Injection<br><b>NO</b> |
| Engine Emissions Data<br><b>REV. 0.1</b>                       |                              |

|                      |                     |                      |
|----------------------|---------------------|----------------------|
| <b>NOx EMISSIONS</b> | <b>CO EMISSIONS</b> | <b>UHC EMISSIONS</b> |
|----------------------|---------------------|----------------------|

|          |                |                    |                      |                            |                                |
|----------|----------------|--------------------|----------------------|----------------------------|--------------------------------|
| <b>1</b> | <b>3086 kW</b> | <b>100.0% Load</b> | <b>Elev. 5600 ft</b> | <b>Rel. Humidity 60.0%</b> | <b>Temperature 32.0 Deg. F</b> |
|----------|----------------|--------------------|----------------------|----------------------------|--------------------------------|

|                                   |              |              |              |
|-----------------------------------|--------------|--------------|--------------|
| PPMvd at 15% O2                   | <b>25.00</b> | <b>50.00</b> | <b>25.00</b> |
| ton/yr                            | <b>16.55</b> | <b>20.16</b> | <b>5.77</b>  |
| lbm/MMBtu (Fuel LHV)              | <b>0.100</b> | <b>0.122</b> | <b>0.035</b> |
| lbm/(MW-hr)                       | <b>1.16</b>  | <b>1.41</b>  | <b>0.40</b>  |
| (gas turbine shaft pwr)<br>lbm/hr | <b>3.78</b>  | <b>4.60</b>  | <b>1.32</b>  |

|          |                |                    |                      |                            |                                |
|----------|----------------|--------------------|----------------------|----------------------------|--------------------------------|
| <b>2</b> | <b>2790 kW</b> | <b>100.0% Load</b> | <b>Elev. 5600 ft</b> | <b>Rel. Humidity 60.0%</b> | <b>Temperature 59.0 Deg. F</b> |
|----------|----------------|--------------------|----------------------|----------------------------|--------------------------------|

|                                   |              |              |              |
|-----------------------------------|--------------|--------------|--------------|
| PPMvd at 15% O2                   | <b>25.00</b> | <b>50.00</b> | <b>25.00</b> |
| ton/yr                            | <b>15.26</b> | <b>18.58</b> | <b>5.32</b>  |
| lbm/MMBtu (Fuel LHV)              | <b>0.100</b> | <b>0.121</b> | <b>0.035</b> |
| lbm/(MW-hr)                       | <b>1.18</b>  | <b>1.44</b>  | <b>0.41</b>  |
| (gas turbine shaft pwr)<br>lbm/hr | <b>3.48</b>  | <b>4.24</b>  | <b>1.21</b>  |

|          |                |                    |                      |                            |                                |
|----------|----------------|--------------------|----------------------|----------------------------|--------------------------------|
| <b>3</b> | <b>2554 kW</b> | <b>100.0% Load</b> | <b>Elev. 5600 ft</b> | <b>Rel. Humidity 60.0%</b> | <b>Temperature 80.0 Deg. F</b> |
|----------|----------------|--------------------|----------------------|----------------------------|--------------------------------|

|                                   |              |              |              |
|-----------------------------------|--------------|--------------|--------------|
| PPMvd at 15% O2                   | <b>25.00</b> | <b>50.00</b> | <b>25.00</b> |
| ton/yr                            | <b>14.27</b> | <b>17.38</b> | <b>4.98</b>  |
| lbm/MMBtu (Fuel LHV)              | <b>0.099</b> | <b>0.120</b> | <b>0.034</b> |
| lbm/(MW-hr)                       | <b>1.21</b>  | <b>1.47</b>  | <b>0.42</b>  |
| (gas turbine shaft pwr)<br>lbm/hr | <b>3.26</b>  | <b>3.97</b>  | <b>1.14</b>  |

### Notes

- For short-term emission limits such as lbs/hr., Solar recommends using "worst case" anticipated operating conditions specific to the application and the site conditions. Worst case for one pollutant is not necessarily the same for another.
- Solar's typical SoLoNOx warranty, for ppm values, is available for greater than 0 deg F or -20 deg F, and between 50% and 100% load for gas fuel, and between 65% and 100% load for liquid fuel (except for the Centaur 40). An emission warranty for non-SoLoNOx equipment is available for greater than 0 deg F or -20 deg F and between 80% and 100% load.
- Fuel must meet Solar standard fuel specification ES 9-98. Emissions are based on the attached fuel composition, or, San Diego natural gas or equivalent.
- If needed, Solar can provide Product Information Letters to address turbine operation outside typical warranty ranges, as well as non-warranted emissions of SO2, PM10/2.5, VOC, and formaldehyde.
- Solar can provide factory testing in San Diego to ensure the actual unit(s) meet the above values within the tolerances quoted. Pricing and schedule impact will be provided upon request.
- Any emissions warranty is applicable only for steady-state conditions and does not apply during start-up, shut-down, malfunction, or transient event.

|                                     |                              |
|-------------------------------------|------------------------------|
| Customer<br><b>Hilcorp San Juan</b> |                              |
| Job ID<br><b>4701S Upgrade</b>      |                              |
| Inquiry Number                      |                              |
| Run By<br><b>Jose Guillen</b>       | Date Run<br><b>15-Aug-23</b> |

|  |                              |
|--|------------------------------|
| Engine Model<br><b>CENTAUR 40-4700S</b><br><b>GSC STANDARD</b> |                              |
| Fuel Type<br><b>SD NATURAL GAS</b>                             | Water Injection<br><b>NO</b> |
| Engine Emissions Data<br><b>REV. 0.1</b>                       |                              |

### NOx EMISSIONS

### CO EMISSIONS

### UHC EMISSIONS

| 4                                 | 2085 kW | 100.0% Load | Elev. 5600 ft | Rel. Humidity 60.0% | Temperature 122.0 Deg. F |
|-----------------------------------|---------|-------------|---------------|---------------------|--------------------------|
| PPMvd at 15% O2                   | 25.00   |             | 50.00         |                     | 25.00                    |
| ton/yr                            | 12.11   |             | 14.74         |                     | 4.22                     |
| lbm/MMBtu (Fuel LHV)              | 0.095   |             | 0.115         |                     | 0.033                    |
| lbm/(MW-hr)                       | 1.25    |             | 1.53          |                     | 0.44                     |
| (gas turbine shaft pwr)<br>lbm/hr | 2.76    |             | 3.37          |                     | 0.96                     |

#### Notes

- For short-term emission limits such as lbs/hr., Solar recommends using "worst case" anticipated operating conditions specific to the application and the site conditions. Worst case for one pollutant is not necessarily the same for another.
- Solar's typical SoLoNOx warranty, for ppm values, is available for greater than 0 deg F or -20 deg F, and between 50% and 100% load for gas fuel, and between 65% and 100% load for liquid fuel (except for the Centaur 40). An emission warranty for non-SoLoNOx equipment is available for greater than 0 deg F or -20 deg F and between 80% and 100% load.
- Fuel must meet Solar standard fuel specification ES 9-98. Emissions are based on the attached fuel composition, or, San Diego natural gas or equivalent.
- If needed, Solar can provide Product Information Letters to address turbine operation outside typical warranty ranges, as well as non-warranted emissions of SO2, PM10/2.5, VOC, and formaldehyde.
- Solar can provide factory testing in San Diego to ensure the actual unit(s) meet the above values within the tolerances quoted. Pricing and schedule impact will be provided upon request.
- Any emissions warranty is applicable only for steady-state conditions and does not apply during start-up, shut-down, malfunction, or transient event.

# Solar Turbines

A Caterpillar Company

## PREDICTED ENGINE PERFORMANCE

|   |  |                                    |  |
|---|--|------------------------------------|--|
| Customer<br><b>Hilcorp San Juan</b>                 |  | Model<br><b>CENTAUR 40-4700S</b>   |  |
| Job ID<br><b>4701S Upgrade</b>                      |  | Package Type<br><b>GSC</b>         |  |
| Run By<br><b>Jose Guillen</b>                       |  | Match<br><b>STANDARD</b>           |  |
| Date Run<br><b>15-Aug-23</b>                        |  | Fuel System<br><b>GAS</b>          |  |
| Engine Performance Code<br><b>REV. 4.20.2.28.14</b> |  | Fuel Type<br><b>SD NATURAL GAS</b> |  |
| Engine Performance Data<br><b>REV. 0.4</b>          |  |                                    |  |

### DATA FOR NOMINAL PERFORMANCE

|                           |           |        |        |        |        |
|---------------------------|-----------|--------|--------|--------|--------|
| Elevation                 | feet      | 5600   |        |        |        |
| Inlet Loss                | in H2O    | 3.0    |        |        |        |
| Exhaust Loss              | in H2O    | 3.0    |        |        |        |
|                           |           | 1      | 2      | 3      | 4      |
| Engine Inlet Temperature  | deg F     | 32.0   | 59.0   | 80.0   | 122.0  |
| Relative Humidity         | %         | 60.0   | 60.0   | 60.0   | 60.0   |
| Gearbox Efficiency        |           | 0.9750 | 0.9750 | 0.9750 | 0.9750 |
| Generator Efficiency      |           | 0.9700 | 0.9700 | 0.9700 | 0.9700 |
| Based On 1.0 Power Factor |           |        |        |        |        |
| Specified Load*           | kW        | FULL   | FULL   | FULL   | FULL   |
| Net Output Power*         | kW        | 3086   | 2790   | 2554   | 2085   |
| Fuel Flow                 | mmBtu/hr  | 37.40  | 34.66  | 32.69  | 28.96  |
| Heat Rate*                | Btu/kW-hr | 12118  | 12423  | 12799  | 13887  |
| Therm Eff*                | %         | 28.158 | 27.466 | 26.659 | 24.570 |
| Engine Exhaust Flow       | lbm/hr    | 128421 | 121404 | 116248 | 102056 |
| PT Exit Temperature       | deg F     | 820    | 834    | 845    | 884    |
| Exhaust Temperature       | deg F     | 820    | 834    | 845    | 884    |

|  |                        |        |
|--|------------------------|--------|
| Fuel Gas Composition<br>(Volume Percent) | Methane (CH4)          | 92.79  |
|  | Ethane (C2H6)          | 4.16   |
|  | Propane (C3H8)         | 0.84   |
|  | N-Butane (C4H10)       | 0.18   |
|  | N-Pentane (C5H12)      | 0.04   |
|  | Hexane (C6H14)         | 0.04   |
|  | Carbon Dioxide (CO2)   | 0.44   |
|  | Hydrogen Sulfide (H2S) | 0.0001 |
|  | Nitrogen (N2)          | 1.51   |

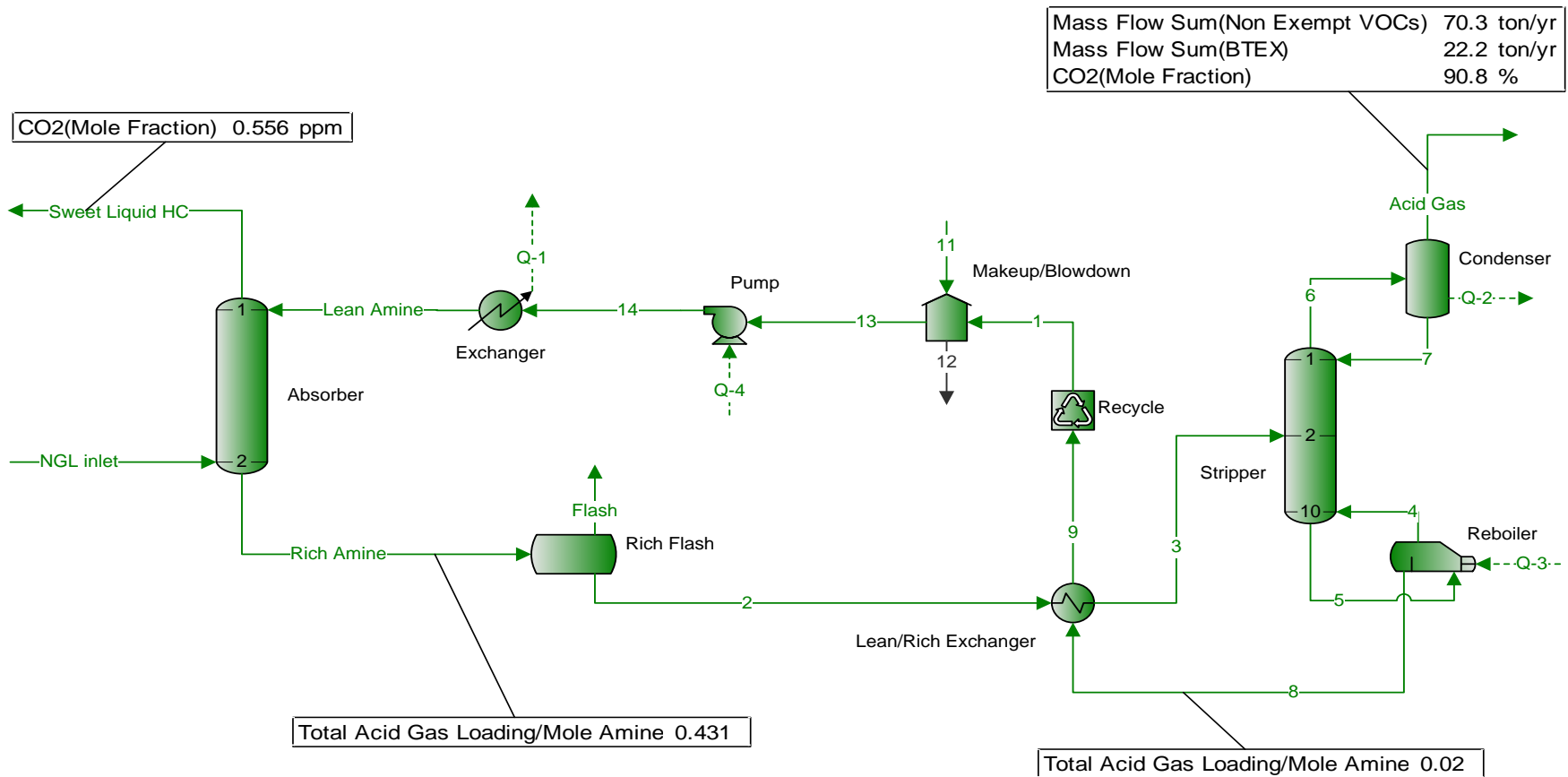
|                     |               |       |                  |        |                    |        |
|---------------------|---------------|-------|------------------|--------|--------------------|--------|
| Fuel Gas Properties | LHV (Btu/Scf) | 939.2 | Specific Gravity | 0.5970 | Wobbe Index at 60F | 1215.6 |
|---------------------|---------------|-------|------------------|--------|--------------------|--------|

\*Electric power measured at the generator terminals.

This performance was calculated with a basic inlet and exhaust system. Special equipment such as low noise silencers, special filters, heat recovery systems or cooling devices will affect engine performance. Performance shown is "Expected" performance at the pressure drops stated, not guaranteed.

Information carried over from previous application

## San Juan – Product Treater - Recovery

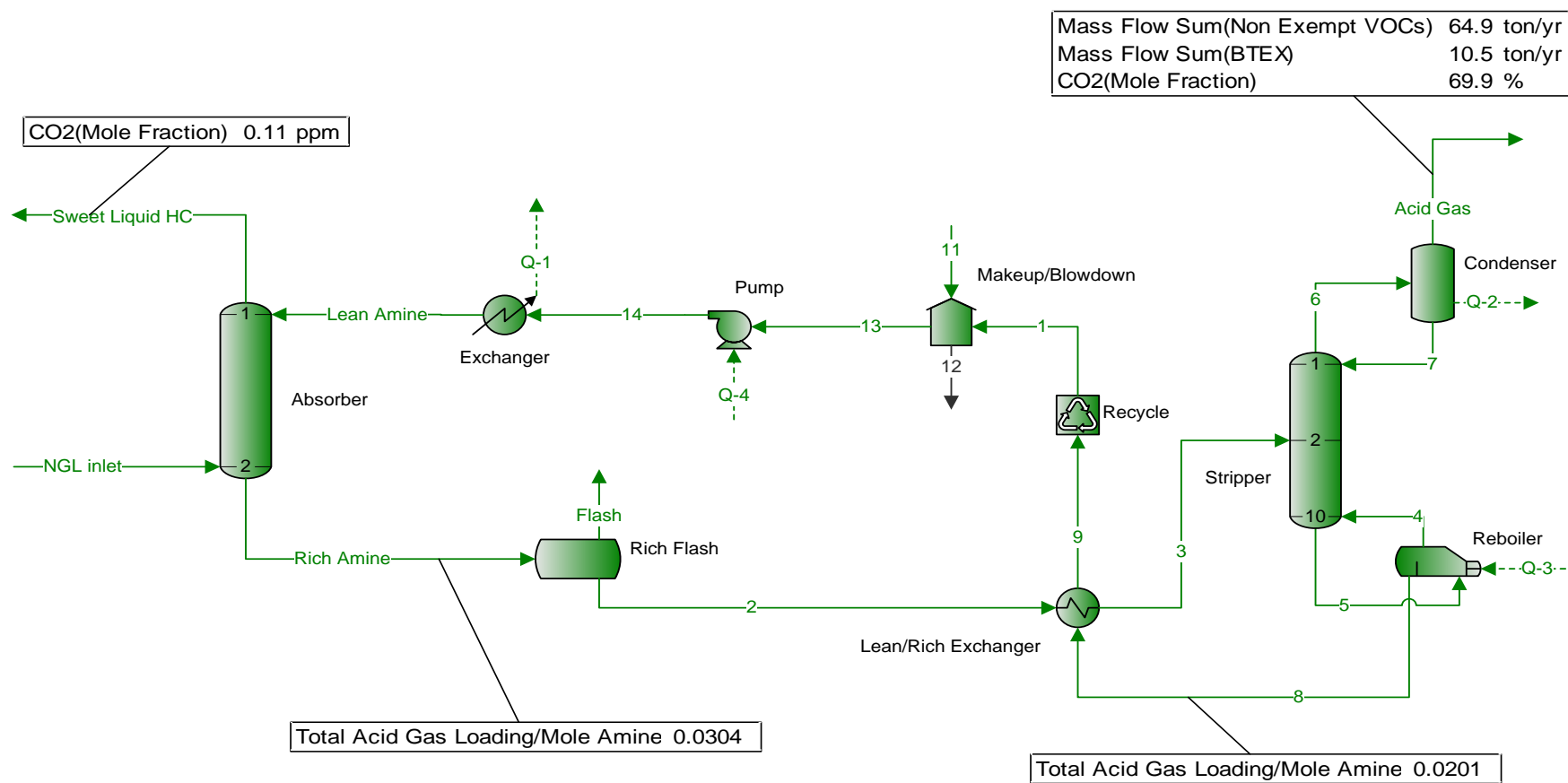


| Process Streams      | Acid Gas                     | Flash             | Lean Amine       | NGL inlet       | Rich Amine        | Sweet Liquid HC |
|----------------------|------------------------------|-------------------|------------------|-----------------|-------------------|-----------------|
| <b>Composition</b>   | Status: <b>Solved</b>        | <b>Solved</b>     | <b>Solved</b>    | <b>Solved</b>   | <b>Solved</b>     | <b>Solved</b>   |
| Phase: <b>Vapor</b>  | From Block: <b>Condenser</b> | <b>Rich Flash</b> | <b>Exchanger</b> | <b>--</b>       | <b>Absorber</b>   | <b>Absorber</b> |
|                      | To Block: <b>--</b>          | <b>--</b>         | <b>Absorber</b>  | <b>Absorber</b> | <b>Rich Flash</b> | <b>--</b>       |
| <b>Mole Fraction</b> | <b>%</b>                     | <b>%</b>          | <b>%</b>         | <b>%</b>        | <b>%</b>          | <b>%</b>        |
| N2                   | 0                            | 0                 |                  |                 |                   |                 |
| C1                   | 0.0169863                    | 4.26775           |                  |                 |                   |                 |
| CO2                  | 90.7959                      | 2.27810           |                  |                 |                   |                 |
| C2                   | 0.412436                     | 76.9138           |                  |                 |                   |                 |
| C3                   | 0.0512365                    | 11.9292           |                  |                 |                   |                 |
| iC4                  | 0.00198932                   | 0.708914          |                  |                 |                   |                 |
| nC4                  | 0.00507263                   | 1.20580           |                  |                 |                   |                 |
| iC5                  | 0.000282121                  | 0.121588          |                  |                 |                   |                 |
| nC5                  | 0.000268767                  | 0.0933047         |                  |                 |                   |                 |
| iC6                  | 0                            | 0                 |                  |                 |                   |                 |
| nC6                  | 6.47433E-05                  | 0.0275003         |                  |                 |                   |                 |
| Benzene              | 0.0105597                    | 0.0264395         |                  |                 |                   |                 |
| Cyclohexane          | 0.000282225                  | 0.0194101         |                  |                 |                   |                 |
| iC7                  | 0                            | 0                 |                  |                 |                   |                 |
| nC7                  | 5.39547E-06                  | 0.00390490        |                  |                 |                   |                 |
| Toluene              | 0.00423637                   | 0.0103260         |                  |                 |                   |                 |
| iC8                  | 0                            | 0                 |                  |                 |                   |                 |
| nC8                  | 1.16583E-06                  | 0.000841236       |                  |                 |                   |                 |
| Ethylbenzene         | 4.53322E-05                  | 0.000131900       |                  |                 |                   |                 |
| o-Xylene             | 0.000449416                  | 0.000894147       |                  |                 |                   |                 |
| 2-Methyloctane       | 0                            | 0                 |                  |                 |                   |                 |
| Nonane               | 0                            | 7.48949E-06       |                  |                 |                   |                 |
| 2-Methylnonane       | 0                            | 0                 |                  |                 |                   |                 |
| Water                | 8.69046                      | 2.39149           |                  |                 |                   |                 |
| DEA                  | 1.45057E-17                  | 4.95547E-06       |                  |                 |                   |                 |
| C10+                 | 0                            | 0                 |                  |                 |                   |                 |
| Hydrogen Sulfide     | 0.00970111                   | 0.000656970       |                  |                 |                   |                 |
| <b>Molar Flow</b>    | <b>lbmol/h</b>               | <b>lbmol/h</b>    | <b>lbmol/h</b>   | <b>lbmol/h</b>  | <b>lbmol/h</b>    | <b>lbmol/h</b>  |
| N2                   | 0                            | 0                 |                  |                 |                   |                 |
| C1                   | 0.0680062                    | 0.372694          |                  |                 |                   |                 |
| CO2                  | 363.510                      | 0.198942          |                  |                 |                   |                 |
| C2                   | 1.65122                      | 6.71672           |                  |                 |                   |                 |
| C3                   | 0.205130                     | 1.04175           |                  |                 |                   |                 |
| iC4                  | 0.00796441                   | 0.0619080         |                  |                 |                   |                 |
| nC4                  | 0.0203087                    | 0.105300          |                  |                 |                   |                 |
| iC5                  | 0.00112950                   | 0.0106180         |                  |                 |                   |                 |
| nC5                  | 0.00107603                   | 0.00814811        |                  |                 |                   |                 |
| iC6                  | 0                            | 0                 |                  |                 |                   |                 |
| nC6                  | 0.000259206                  | 0.00240154        |                  |                 |                   |                 |
| Benzene              | 0.0422766                    | 0.00230891        |                  |                 |                   |                 |
| Cyclohexane          | 0.00112991                   | 0.00169505        |                  |                 |                   |                 |
| iC7                  | 0                            | 0                 |                  |                 |                   |                 |
| nC7                  | 2.16012E-05                  | 0.000341006       |                  |                 |                   |                 |
| Toluene              | 0.0169607                    | 0.000901747       |                  |                 |                   |                 |
| iC8                  | 0                            | 0                 |                  |                 |                   |                 |
| nC8                  | 4.66750E-06                  | 7.34634E-05       |                  |                 |                   |                 |
| Ethylbenzene         | 0.000181492                  | 1.15185E-05       |                  |                 |                   |                 |
| o-Xylene             | 0.00179928                   | 7.80840E-05       |                  |                 |                   |                 |
| 2-Methyloctane       | 0                            | 0                 |                  |                 |                   |                 |
| Nonane               | 0                            | 6.54042E-07       |                  |                 |                   |                 |
| 2-Methylnonane       | 0                            | 0                 |                  |                 |                   |                 |
| Water                | 34.7930                      | 0.208844          |                  |                 |                   |                 |
| DEA                  | 5.80748E-17                  | 4.32751E-07       |                  |                 |                   |                 |
| C10+                 | 0                            | 0                 |                  |                 |                   |                 |
| Hydrogen Sulfide     | 0.0388392                    | 5.73718E-05       |                  |                 |                   |                 |

| Mass Fraction    | %           | %           | %    | %    | %    | %    |
|------------------|-------------|-------------|------|------|------|------|
| N2               | 0           | 0           |      |      |      |      |
| C1               | 0.00653567  | 2.14962     |      |      |      |      |
| CO2              | 95.8370     | 3.14784     |      |      |      |      |
| C2               | 0.297438    | 72.6133     |      |      |      |      |
| C3               | 0.0541870   | 16.5157     |      |      |      |      |
| iC4              | 0.00277311  | 1.29368     |      |      |      |      |
| nC4              | 0.00707124  | 2.20044     |      |      |      |      |
| iC5              | 0.000488186 | 0.275430    |      |      |      |      |
| nC5              | 0.000465077 | 0.211361    |      |      |      |      |
| iC6              | 0           | 0           |      |      |      |      |
| nC6              | 0.000133813 | 0.0744068   |      |      |      |      |
| Benzene          | 0.0197828   | 0.0648430   |      |      |      |      |
| Cyclohexane      | 0.000569664 | 0.0512890   |      |      |      |      |
| iC7              | 0           | 0           |      |      |      |      |
| nC7              | 1.29666E-05 | 0.0122851   |      |      |      |      |
| Toluene          | 0.00936172  | 0.0298720   |      |      |      |      |
| iC8              | 0           | 0           |      |      |      |      |
| nC8              | 3.19396E-06 | 0.00301707  |      |      |      |      |
| Ethylbenzene     | 0.000115427 | 0.000439661 |      |      |      |      |
| o-Xylene         | 0.00114433  | 0.00298046  |      |      |      |      |
| 2-Methyloctane   | 0           | 0           |      |      |      |      |
| Nonane           | 0           | 3.01592E-05 |      |      |      |      |
| 2-Methylnonane   | 0           | 0           |      |      |      |      |
| Water            | 3.75495     | 1.35270     |      |      |      |      |
| DEA              | 3.65771E-17 | 1.63579E-05 |      |      |      |      |
| C10+             | 0           | 0           |      |      |      |      |
| Hydrogen Sulfide | 0.00792963  | 0.000702989 |      |      |      |      |
| Mass Flow        | lb/h        | lb/h        | lb/h | lb/h | lb/h | lb/h |
| N2               | 0           | 0           |      |      |      |      |
| C1               | 1.09099     | 5.97892     |      |      |      |      |
| CO2              | 15997.9     | 8.75534     |      |      |      |      |
| C2               | 49.6507     | 201.965     |      |      |      |      |
| C3               | 9.04533     | 45.9365     |      |      |      |      |
| iC4              | 0.462909    | 3.59823     |      |      |      |      |
| nC4              | 1.18039     | 6.12026     |      |      |      |      |
| iC5              | 0.0814918   | 0.766075    |      |      |      |      |
| nC5              | 0.0776344   | 0.587876    |      |      |      |      |
| iC6              | 0           | 0           |      |      |      |      |
| nC6              | 0.0223371   | 0.206954    |      |      |      |      |
| Benzene          | 3.30231     | 0.180353    |      |      |      |      |
| Cyclohexane      | 0.0950929   | 0.142654    |      |      |      |      |
| iC7              | 0           | 0           |      |      |      |      |
| nC7              | 0.00216448  | 0.0341695   |      |      |      |      |
| Toluene          | 1.56273     | 0.0830856   |      |      |      |      |
| iC8              | 0           | 0           |      |      |      |      |
| nC8              | 0.000533161 | 0.00839161  |      |      |      |      |
| Ethylbenzene     | 0.0192681   | 0.00122287  |      |      |      |      |
| o-Xylene         | 0.191020    | 0.00828979  |      |      |      |      |
| 2-Methyloctane   | 0           | 0           |      |      |      |      |
| Nonane           | 0           | 8.38842E-05 |      |      |      |      |
| 2-Methylnonane   | 0           | 0           |      |      |      |      |
| Water            | 626.806     | 3.76239     |      |      |      |      |
| DEA              | 6.10574E-15 | 4.54976E-05 |      |      |      |      |
| C10+             | 0           | 0           |      |      |      |      |
| Hydrogen Sulfide | 1.32368     | 0.00195528  |      |      |      |      |

| Process Streams               |               | Acid Gas     | Flash      | Lean Amine | NGL inlet | Rich Amine | Sweet Liquid HC |
|-------------------------------|---------------|--------------|------------|------------|-----------|------------|-----------------|
| <b>Properties</b>             |               | Status:      | Solved     | Solved     | Solved    | Solved     | Solved          |
| Phase: Vapor                  | From Block:   | Condenser    | Rich Flash | Exchanger  | --        | Absorber   | Absorber        |
|                               | To Block:     | --           | --         | Absorber   | Absorber  | Rich Flash | --              |
| Property                      | Units         |              |            |            |           |            |                 |
| Temperature                   | °F            | 120          | 127.398    |            |           |            |                 |
| Pressure                      | psia          | 19.6959      | 81         |            |           |            |                 |
| Mole Fraction Vapor           | %             | 100          | 100        |            |           |            |                 |
| Mole Fraction Light Liquid    | %             | 0            | 0          |            |           |            |                 |
| Mole Fraction Heavy Liquid    | %             | 0            | 0          |            |           |            |                 |
| Molecular Weight              | lb/lbmol      | 41.6946      | 31.8499    |            |           |            |                 |
| Mass Density                  | lb/ft^3       | 0.132760     | 0.424107   |            |           |            |                 |
| Molar Flow                    | lbmol/h       | 400.359      | 8.73279    |            |           |            |                 |
| Mass Flow                     | lb/h          | 16692.8      | 278.138    |            |           |            |                 |
| Vapor Volumetric Flow         | ft^3/h        | 125736       | 655.821    |            |           |            |                 |
| Liquid Volumetric Flow        | gpm           | 15676.2      | 81.7647    |            |           |            |                 |
| Std Vapor Volumetric Flow     | MMSCFD        | 3.64632      | 0.0795349  |            |           |            |                 |
| Std Liquid Volumetric Flow    | sgpm          | 40.7321      | 1.42284    |            |           |            |                 |
| Compressibility               |               | 0.994360     | 0.965530   |            |           |            |                 |
| Specific Gravity              |               | 1.43961      | 1.09969    |            |           |            |                 |
| API Gravity                   |               |              |            |            |           |            |                 |
| Enthalpy                      | Btu/h         | -6.50413E+07 | -362645    |            |           |            |                 |
| Mass Enthalpy                 | Btu/lb        | -3896.37     | -1303.83   |            |           |            |                 |
| Mass Cp                       | Btu/(lb*°F)   | 0.219099     | 0.448880   |            |           |            |                 |
| Ideal Gas CpCv Ratio          |               | 1.28059      | 1.16669    |            |           |            |                 |
| Dynamic Viscosity             | cP            | 0.0160712    | 0.0104067  |            |           |            |                 |
| Kinematic Viscosity           | cSt           | 7.55717      | 1.53185    |            |           |            |                 |
| Thermal Conductivity          | Btu/(h*ft*°F) | 0.0106933    | 0.0143119  |            |           |            |                 |
| Surface Tension               | lbf/ft        |              |            |            |           |            |                 |
| Net Ideal Gas Heating Value   | Btu/ft^3      | 8.90742      | 1629.45    |            |           |            |                 |
| Net Liquid Heating Value      | Btu/lb        | -31.0410     | 19254.3    |            |           |            |                 |
| Gross Ideal Gas Heating Value | Btu/ft^3      | 14.0724      | 1780.55    |            |           |            |                 |
| Gross Liquid Heating Value    | Btu/lb        | 15.9743      | 21056.2    |            |           |            |                 |

## San Juan – Product Treater - Rejection



| Process Streams      | Acid Gas                     | Flash             | Lean Amine                | NGL inlet          | Rich Amine                 | Sweet Liquid HC |
|----------------------|------------------------------|-------------------|---------------------------|--------------------|----------------------------|-----------------|
| <b>Composition</b>   | Status: <b>Solved</b>        | <b>Solved</b>     | <b>Solved</b>             | <b>Solved</b>      | <b>Solved</b>              | <b>Solved</b>   |
| Phase: <b>Vapor</b>  | From Block: <b>Condenser</b> | <b>Rich Flash</b> | <b>Exchanger Absorber</b> | <b>-- Absorber</b> | <b>Absorber Rich Flash</b> | <b>Absorber</b> |
| To Block:            | --                           | --                |                           |                    |                            | --              |
| <b>Mole Fraction</b> | <b>%</b>                     | <b>%</b>          | <b>%</b>                  | <b>%</b>           | <b>%</b>                   | <b>%</b>        |
| N2                   | 0.0119168                    | 0.212709          |                           |                    |                            |                 |
| C1                   | 0.00492252                   | 0.0339410         |                           |                    |                            |                 |
| CO2                  | 69.9459                      | 0.000517861       |                           |                    |                            |                 |
| C2                   | 15.4727                      | 69.7107           |                           |                    |                            |                 |
| C3                   | 4.34068                      | 24.4938           |                           |                    |                            |                 |
| iC4                  | 0.186026                     | 1.55683           |                           |                    |                            |                 |
| nC4                  | 0.394613                     | 2.22824           |                           |                    |                            |                 |
| iC5                  | 0.0295579                    | 0.266725          |                           |                    |                            |                 |
| nC5                  | 0.0236755                    | 0.176782          |                           |                    |                            |                 |
| iC6                  | 0                            | 0                 |                           |                    |                            |                 |
| nC6                  | 0.00477207                   | 0.0417144         |                           |                    |                            |                 |
| Benzene              | 0.378208                     | 0.0185278         |                           |                    |                            |                 |
| Cyclohexane          | 0.0127578                    | 0.0191615         |                           |                    |                            |                 |
| iC7                  | 0                            | 0                 |                           |                    |                            |                 |
| nC7                  | 0.000450812                  | 0.00603792        |                           |                    |                            |                 |
| Toluene              | 0.147390                     | 0.00621890        |                           |                    |                            |                 |
| iC8                  | 0                            | 0                 |                           |                    |                            |                 |
| nC8                  | 6.61380E-05                  | 0.000975743       |                           |                    |                            |                 |
| Ethylbenzene         | 0.000986344                  | 4.95304E-05       |                           |                    |                            |                 |
| o-Xylene             | 0.0108394                    | 0.000346393       |                           |                    |                            |                 |
| 2-Methyloctane       | 0                            | 0                 |                           |                    |                            |                 |
| Nonane               | 1.88372E-07                  | 6.73223E-06       |                           |                    |                            |                 |
| 2-Methylnonane       | 0                            | 0                 |                           |                    |                            |                 |
| Water                | 8.67871                      | 1.22672           |                           |                    |                            |                 |
| DEA                  | 4.99650E-16                  | 6.32503E-06       |                           |                    |                            |                 |
| C10+                 | 0                            | 0                 |                           |                    |                            |                 |
| Hydrogen Sulfide     | 0.355833                     | 3.56046E-05       |                           |                    |                            |                 |
| <b>Molar Flow</b>    | <b>lbmol/h</b>               | <b>lbmol/h</b>    | <b>lbmol/h</b>            | <b>lbmol/h</b>     | <b>lbmol/h</b>             | <b>lbmol/h</b>  |
| N2                   | 0.000642718                  | 0.00515813        |                           |                    |                            |                 |
| C1                   | 0.000265490                  | 0.000823056       |                           |                    |                            |                 |
| CO2                  | 3.77245                      | 1.25579E-05       |                           |                    |                            |                 |
| C2                   | 0.834501                     | 1.69046           |                           |                    |                            |                 |
| C3                   | 0.234109                     | 0.593965          |                           |                    |                            |                 |
| iC4                  | 0.0100331                    | 0.0377526         |                           |                    |                            |                 |
| nC4                  | 0.0212830                    | 0.0540339         |                           |                    |                            |                 |
| iC5                  | 0.00159417                   | 0.00646799        |                           |                    |                            |                 |
| nC5                  | 0.00127691                   | 0.00428690        |                           |                    |                            |                 |
| iC6                  | 0                            | 0                 |                           |                    |                            |                 |
| nC6                  | 0.000257376                  | 0.00101156        |                           |                    |                            |                 |
| Benzene              | 0.0203982                    | 0.000449292       |                           |                    |                            |                 |
| Cyclohexane          | 0.000688078                  | 0.000464659       |                           |                    |                            |                 |
| iC7                  | 0                            | 0                 |                           |                    |                            |                 |
| nC7                  | 2.43140E-05                  | 0.000146417       |                           |                    |                            |                 |
| Toluene              | 0.00794929                   | 0.000150806       |                           |                    |                            |                 |
| iC8                  | 0                            | 0                 |                           |                    |                            |                 |
| nC8                  | 3.56707E-06                  | 2.36614E-05       |                           |                    |                            |                 |
| Ethylbenzene         | 5.31973E-05                  | 1.20109E-06       |                           |                    |                            |                 |
| o-Xylene             | 0.000584612                  | 8.39990E-06       |                           |                    |                            |                 |
| 2-Methyloctane       | 0                            | 0                 |                           |                    |                            |                 |
| Nonane               | 1.01596E-08                  | 1.63254E-07       |                           |                    |                            |                 |
| 2-Methylnonane       | 0                            | 0                 |                           |                    |                            |                 |
| Water                | 0.468076                     | 0.0297476         |                           |                    |                            |                 |
| DEA                  | 2.69480E-17                  | 1.53380E-07       |                           |                    |                            |                 |
| C10+                 | 0                            | 0                 |                           |                    |                            |                 |
| Hydrogen Sulfide     | 0.0191914                    | 8.63398E-07       |                           |                    |                            |                 |

| Mass Fraction    | %           | %           | %                | %    | %    | %    |
|------------------|-------------|-------------|------------------|------|------|------|
| N2               | 0.00837226  | 0.171978    |                  |      |      |      |
| C1               | 0.00198051  | 0.0157150   |                  |      |      |      |
| CO2              | 77.2016     | 0.000657779 |                  |      |      |      |
| C2               | 11.6682     | 60.4978     | 11.6701489857469 |      |      |      |
| C3               | 4.80033     | 31.1725     |                  |      |      |      |
| iC4              | 0.271164    | 2.61158     |                  |      |      |      |
| nC4              | 0.575217    | 3.73786     |                  |      |      |      |
| iC5              | 0.0534835   | 0.555409    |                  |      |      |      |
| nC5              | 0.0428397   | 0.368118    |                  |      |      |      |
| iC6              | 0           | 0           |                  |      |      |      |
| nC6              | 0.0103135   | 0.103750    |                  |      |      |      |
| Benzene          | 0.740910    | 0.0417696   |                  |      |      |      |
| Cyclohexane      | 0.0269276   | 0.0465428   |                  |      |      |      |
| iC7              | 0           | 0           |                  |      |      |      |
| nC7              | 0.00113289  | 0.0174616   |                  |      |      |      |
| Toluene          | 0.340585    | 0.0165377   |                  |      |      |      |
| iC8              | 0           | 0           |                  |      |      |      |
| nC8              | 0.000189471 | 0.00321685  |                  |      |      |      |
| Ethylbenzene     | 0.00262620  | 0.000151766 |                  |      |      |      |
| o-Xylene         | 0.0288606   | 0.00106138  |                  |      |      |      |
| 2-Methyloctane   | 0           | 0           |                  |      |      |      |
| Nonane           | 6.05912E-07 | 2.49203E-05 |                  |      |      |      |
| 2-Methylnonane   | 0           | 0           |                  |      |      |      |
| Water            | 3.92115     | 0.637835    |                  |      |      |      |
| DEA              | 1.31745E-15 | 1.91926E-05 |                  |      |      |      |
| C10+             | 0           | 0           |                  |      |      |      |
| Hydrogen Sulfide | 0.304141    | 3.50217E-05 |                  |      |      |      |
| Mass Flow        | lb/h        | lb/h        | lb/h             | lb/h | lb/h | lb/h |
| N2               | 0.0180047   | 0.144497    |                  |      |      |      |
| C1               | 0.00425912  | 0.0132038   |                  |      |      |      |
| CO2              | 166.024     | 0.000552669 |                  |      |      |      |
| C2               | 25.0926     | 50.8305     |                  |      |      |      |
| C3               | 10.3232     | 26.1913     |                  |      |      |      |
| iC4              | 0.583144    | 2.19426     |                  |      |      |      |
| nC4              | 1.23702     | 3.14057     |                  |      |      |      |
| iC5              | 0.115017    | 0.466657    |                  |      |      |      |
| nC5              | 0.0921277   | 0.309294    |                  |      |      |      |
| iC6              | 0           | 0           |                  |      |      |      |
| nC6              | 0.0221795   | 0.0871715   |                  |      |      |      |
| Benzene          | 1.59334     | 0.0350950   |                  |      |      |      |
| Cyclohexane      | 0.0579083   | 0.0391054   |                  |      |      |      |
| iC7              | 0           | 0           |                  |      |      |      |
| nC7              | 0.00243631  | 0.0146713   |                  |      |      |      |
| Toluene          | 0.732435    | 0.0138950   |                  |      |      |      |
| iC8              | 0           | 0           |                  |      |      |      |
| nC8              | 0.000407462 | 0.00270281  |                  |      |      |      |
| Ethylbenzene     | 0.00564769  | 0.000127514 |                  |      |      |      |
| o-Xylene         | 0.0620653   | 0.000891775 |                  |      |      |      |
| 2-Methyloctane   | 0           | 0           |                  |      |      |      |
| Nonane           | 1.30303E-06 | 2.09382E-05 |                  |      |      |      |
| 2-Methylnonane   | 0           | 0           |                  |      |      |      |
| Water            | 8.43252     | 0.535912    |                  |      |      |      |
| DEA              | 2.83320E-15 | 1.61257E-05 |                  |      |      |      |
| C10+             | 0           | 0           |                  |      |      |      |
| Hydrogen Sulfide | 0.654061    | 2.94254E-05 |                  |      |      |      |

| Process Streams               |               | Acid Gas       | Flash      | Lean Amine | NGL inlet | Rich Amine | Sweet Liquid HC |
|-------------------------------|---------------|----------------|------------|------------|-----------|------------|-----------------|
| <b>Properties</b>             |               | Status: Solved | Solved     | Solved     | Solved    | Solved     | Solved          |
| Phase: Vapor                  | From Block:   | Condenser      | Rich Flash | Exchanger  | --        | Absorber   | Absorber        |
|                               | To Block:     | --             | --         | Absorber   | Absorber  | Rich Flash | --              |
| Property                      | Units         |                |            |            |           |            |                 |
| Temperature                   | °F            | 120            | 103.932    |            |           |            |                 |
| Pressure                      | psia          | 19.6959        | 81         |            |           |            |                 |
| Mole Fraction Vapor           | %             | 100            | 100        |            |           |            |                 |
| Mole Fraction Light Liquid    | %             | 0              | 0          |            |           |            |                 |
| Mole Fraction Heavy Liquid    | %             | 0              | 0          |            |           |            |                 |
| Molecular Weight              | lb/lbmol      | 39.8733        | 34.6481    |            |           |            |                 |
| Mass Density                  | lb/ft^3       | 0.127017       | 0.487479   |            |           |            |                 |
| Molar Flow                    | lbmol/h       | 5.39338        | 2.42496    |            |           |            |                 |
| Mass Flow                     | lb/h          | 215.052        | 84.0204    |            |           |            |                 |
| Vapor Volumetric Flow         | ft^3/h        | 1693.09        | 172.357    |            |           |            |                 |
| Liquid Volumetric Flow        | gpm           | 211.087        | 21.4887    |            |           |            |                 |
| Std Vapor Volumetric Flow     | MMSCFD        | 0.0491208      | 0.0220856  |            |           |            |                 |
| Std Liquid Volumetric Flow    | sgpm          | 0.618819       | 0.411496   |            |           |            |                 |
| Compressibility               |               | 0.993921       | 0.951859   |            |           |            |                 |
| Specific Gravity              |               | 1.37672        | 1.19631    |            |           |            |                 |
| API Gravity                   |               |                |            |            |           |            |                 |
| Enthalpy                      | Btu/h         | -726590        | -96257.2   |            |           |            |                 |
| Mass Enthalpy                 | Btu/lb        | -3378.67       | -1145.64   |            |           |            |                 |
| Mass Cp                       | Btu/(lb*°F)   | 0.259506       | 0.440323   |            |           |            |                 |
| Ideal Gas CpCv Ratio          |               | 1.23963        | 1.15583    |            |           |            |                 |
| Dynamic Viscosity             | cP            | 0.0145233      | 0.00962679 |            |           |            |                 |
| Kinematic Viscosity           | cSt           | 7.13807        | 1.23283    |            |           |            |                 |
| Thermal Conductivity          | Btu/(h*ft*°F) | 0.0112737      | 0.0128000  |            |           |            |                 |
| Surface Tension               | lbf/ft        |                |            |            |           |            |                 |
| Net Ideal Gas Heating Value   | Btu/ft^3      | 393.792        | 1830.13    |            |           |            |                 |
| Net Liquid Heating Value      | Btu/lb        | 3618.78        | 19883.5    |            |           |            |                 |
| Gross Ideal Gas Heating Value | Btu/ft^3      | 432.964        | 1996.22    |            |           |            |                 |
| Gross Liquid Heating Value    | Btu/lb        | 3991.85        | 21704.1    |            |           |            |                 |

Table 1.4-1. EMISSION FACTORS FOR NITROGEN OXIDES (NO<sub>x</sub>) AND CARBON MONOXIDE (CO)  
FROM NATURAL GAS COMBUSTION<sup>a</sup>

| Combustor Type<br>(MMBtu/hr Heat Input)<br>[SCC]                                | NO <sub>x</sub> <sup>b</sup>                |                              | CO  |                              |
|---|---|------------------------------|---|------------------------------|
|   | Emission Factor<br>(lb/10 <sup>6</sup> scf) | Emission<br>Factor<br>Rating | Emission Factor<br>(lb/10 <sup>6</sup> scf) | Emission<br>Factor<br>Rating |
| Large Wall-Fired Boilers<br>(>100)<br>[1-01-006-01, 1-02-006-01, 1-03-006-01]   |   |                              |   |                              |
| Uncontrolled (Pre-NSPS) <sup>c</sup>  | 280   | A                            | 84  | B                            |
| Uncontrolled (Post-NSPS) <sup>c</sup>   | 190   | A                            | 84  | B                            |
| Controlled - Low NO <sub>x</sub> burners  | 140   | A                            | 84  | B                            |
| Controlled - Flue gas recirculation   | 100   | D                            | 84  | B                            |
| Small Boilers<br>(<100)<br>[1-01-006-02, 1-02-006-02, 1-03-006-02, 1-03-006-03] |   |                              |   |                              |
| Uncontrolled  | 100   | B                            | 84  | B                            |
| Controlled - Low NO <sub>x</sub> burners  | 50  | D                            | 84  | B                            |
| Controlled - Low NO <sub>x</sub> burners/Flue gas recirculation                 | 32  | C                            | 84  | B                            |
| Tangential-Fired Boilers<br>(All Sizes)<br>[1-01-006-04]                        |   |                              |   |                              |
| Uncontrolled  | 170   | A                            | 24  | C                            |
| Controlled - Flue gas recirculation   | 76  | D                            | 98  | D                            |
| Residential Furnaces<br>(<0.3)<br>[No SCC]                                      |   |                              |   |                              |
| Uncontrolled  | 94  | B                            | 40  | B                            |

<sup>a</sup> Reference 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. To convert from lb/10<sup>6</sup> scf to kg/10<sup>6</sup> m<sup>3</sup>, multiply by 16. Emission factors are based on an average natural gas higher heating value of 1,020 Btu/scf. To convert from lb/10<sup>6</sup> scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. SCC = Source Classification Code. ND = no data. NA = not applicable.

<sup>b</sup> Expressed as NO<sub>2</sub>. For large and small wall fired boilers with SNCR control, apply a 24 percent reduction to the appropriate NO<sub>x</sub> emission factor. For tangential-fired boilers with SNCR control, apply a 13 percent reduction to the appropriate NO<sub>x</sub> emission factor.

<sup>c</sup> NSPS=New Source Performance Standard as defined in 40 CFR 60 Subparts D and Db. Post-NSPS units are boilers with greater than 250 MMBtu/hr of heat input that commenced construction modification, or reconstruction after August 17, 1971, and units with heat input capacities between 100 and 250 MMBtu/hr that commenced construction modification, or reconstruction after June 19, 1984.

TABLE 1.4-2. EMISSION FACTORS FOR CRITERIA POLLUTANTS AND GREENHOUSE GASES FROM NATURAL GAS COMBUSTION<sup>a</sup>

| Pollutant  | Emission Factor<br>(lb/10 <sup>6</sup> scf) | Emission Factor Rating |
|--|---|------------------------|
| CO <sub>2</sub> <sup>b</sup>                             | 120,000                                     | A                      |
| Lead   | 0.0005                                      | D                      |
| N <sub>2</sub> O (Uncontrolled)                          | 2.2   | E                      |
| N <sub>2</sub> O (Controlled-low-NO <sub>x</sub> burner) | 0.64  | E                      |
| PM (Total) <sup>c</sup>                                  | 7.6   | D                      |
| PM (Condensable) <sup>c</sup>                            | 5.7   | D                      |
| PM (Filterable) <sup>c</sup>                             | 1.9   | B                      |
| SO <sub>2</sub> <sup>d</sup>                             | 0.6   | A                      |
| TOC  | 11  | B                      |
| Methane  | 2.3   | B                      |
| VOC  | 5.5   | C                      |

<sup>a</sup> Reference 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. Data are for all natural gas combustion sources. To convert from lb/10<sup>6</sup> scf to kg/10<sup>6</sup> m<sup>3</sup>, multiply by 16. To convert from lb/10<sup>6</sup> scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. TOC = Total Organic Compounds.

VOC = Volatile Organic Compounds.

<sup>b</sup> Based on approximately 100% conversion of fuel carbon to CO<sub>2</sub>. CO<sub>2</sub>[lb/10<sup>6</sup> scf] = (3.67) (CON) (C)(D), where CON = fractional conversion of fuel carbon to CO<sub>2</sub>, C = carbon content of fuel by weight (0.76), and D = density of fuel, 4.2x10<sup>4</sup> lb/10<sup>6</sup> scf.

<sup>c</sup> All PM (total, condensable, and filterable) is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors presented here may be used to estimate PM<sub>10</sub>, PM<sub>2.5</sub> or PM<sub>1</sub> emissions. Total PM is the sum of the filterable PM and condensable PM. Condensable PM is the particulate matter collected using EPA Method 202 (or equivalent). Filterable PM is the particulate matter collected on, or prior to, the filter of an EPA Method 5 (or equivalent) sampling train.

<sup>d</sup> Based on 100% conversion of fuel sulfur to SO<sub>2</sub>.

Assumes sulfur content is natural gas of 2,000 grains/10<sup>6</sup> scf. The SO<sub>2</sub> emission factor in this table can be converted to other natural gas sulfur contents by multiplying the SO<sub>2</sub> emission factor by the ratio of the site-specific sulfur content (grains/10<sup>6</sup> scf) to 2,000 grains/10<sup>6</sup> scf.



# San Juan Basin Gas Plant Engineering Specifications

Farmington, New Mexico

## Cooling Towers



PAN WEST CONSTRUCTORS, INC.

PLANT

PROJECT

CT-1201  
SPECIFICATION SHEET

PROJECT NO. B510

A.F.E. NO.

REQ. NO. B510-3240-023

DATE 9/10/85 APP'D BY ADL

MADE BY NSF/JDH

10/24/85 HSE

GENERAL

1 SELECTION Lilic-Hoffman  
2 TOWER MODEL S17M-3232-3  
3 TYPE Counterflow  
4

DESIGN AND OPERATING  
CONDITIONS

5 CIRCULATING WATER FLOW, U.S. GPM 9,960 DESIGN 11,520 Max.  
6 HOT (INLET) WATER TEMP. F 89 DESIGN OPER  
7 COLD (OUTLET) WATER TEMP. F 71 DESIGN OPER  
8 WET BULB TEMP. F, INLET AMBIENT 64°F W.B. 91°F D.B. DESIGN OPER  
9 TOWER PUMP HEAD, FT. 20.5 DESIGN OPER  
10 TOTAL FAN BHP (DRIVER OUTPUT) 168 DESIGN 294 OPER  
11 DRIFT LOSS, % OF CIRCULATING FLOW 0.01% DESIGN OPER  
12 EVAPORATION LOSS (AT DESIGN) 1.85%  
13 DESIGN WIND LOAD, ~~PSF~~ PSF -MI./HR. 70  
14 DESIGN SEISMIC CODE, % G ZONE 0  
15 TOWER SITE (GROUND LEVEL, ROOF, ETC.) Ground  
16 ELEVATION ABOVE SEA LEVEL, FT. 5,600 ft.  
17 TOWER ORIENTATION Straight line  
18 PREVAILING WIND DIRECTION See General Project Conditions  
19 AVERAGE WIND VELOCITY 4-10 mph  
20

STRUCTURAL DETAILS

21 NUMBER OF CELLS 3  
22 FANS PER CELL 1  
23 TOTAL NUMBER OF FANS 3  
24 NOMINAL CELL DIMENSION, L X W, FT. 32 X 32  
25 OVERALL TOWER DIMENSION, L X W, FT. 96 X 32  
26 HEIGHT BASIN CURB TO FAN DECK, FT. 25  
27 FAN STACK HEIGHT, FT. 14  
28 OVERALL TOWER HEIGHT, FT. 39  
29 INSIDE BASIN DIMENSIONS, FT. 97'-8" x 33'-8"  
30 COLUMN EXTENSIONS, PERIMETER, BELOW  
31 BASIN CURB, FT. 4 ft  
32 INTERNAL, BELOW  
33 CURB, FT. (MAX). 4 ft.  
34 ANCHORAGE Galvanized Bolts by PWC  
35 HOT WATER INLET NUMBER 3  
36 NOMINAL DIAMETER, IN. 14  
37 DESCRIPTION 150" E.E. PVC  
38 HEIGHT INLET ABOVE BASIN CURB, FT. 17  
39 ACCESS TO TOP OF TOWER Stair and Ladder  
40 OPERATING WEIGHT, LBS 230,000  
41

NOTES

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MINIMUM INFORMATION TO BE FILLED IN BY CONOCO.

QUOTATION WILL NOT BE CONSIDERED IF MANUFACTURER DOES NOT COMPLETE FORM BY FURNISHING INFORMATION FOR BLANK SPACES.

SPEC NO. CT-1201 REV. 1  
SHEET 1 OF 3

For flares subject to Chapter 115, Subchapter H, relating to highly reactive volatile organic compounds, flow rate and composition data required by 30 TAC 115.725–26 should be used to determine emissions for any portions of 2009 that HRVOC monitors were installed and operational.

In the absence of monitoring data, selection of the most accurate method may sometimes require exercising scientific judgment. For example, when using the results of a one-time performance test, the test conditions should be compared to the flare’s actual operating conditions during the inventory year to determine whether the test accurately represents the flare’s performance. If test conditions do not accurately model flare operation, then engineering determinations based on detailed process evaluation may provide the best data.

## ***NO<sub>x</sub> and CO Emissions***

To calculate NO<sub>x</sub> and CO emissions, the net heating value of the flared gas must be known. Using the actual short-term flared gas composition and flow rate data for the inventory year, calculate the net heating value of the flared gas and the total heat release for each short time period. Use these total heat release data, in conjunction with the appropriate emission factors from TCEQ Air Permits guidance, to determine NO<sub>x</sub> and CO emissions for each time segment. Since the calculated net heating value of the gas and the assist gas type will determine the appropriate emission factors, carefully select the correct factors for each flare from Table A-6.

Calculate emissions using the most accurate data for the gas flow rate and composition available. (See “Flared Gas Flow Rate and Composition” earlier in this supplement for more information on preferred data.)

**Table A-6. TCEQ Air Permits Flare Emission Factors**

| <b>Contaminant</b> | <b>Assist Type</b> | <b>Waste Gas Stream Net Heating Value<sup>a,b</sup></b> | <b>Emission Factor</b> |
|--------------------|--------------------|---|------------------------|
| NO <sub>x</sub>    | Steam              | High Btu  | 0.0485 lb/MMBtu        |
|                    |                    | Low Btu   | 0.068 lb/MMBtu         |
|                    | Air or Unassisted  | High Btu  | 0.138 lb/MMBtu         |
|                    |                    | Low Btu   | 0.0641 lb/MMBtu        |
| CO                 | Steam              | High Btu  | 0.3503 lb/MMBtu        |
|                    |                    | Low Btu   | 0.3465 lb/MMBtu        |
|                    | Air or Unassisted  | High Btu  | 0.2755 lb/MMBtu        |
|                    |                    | Low Btu   | 0.5496 lb/MMBtu        |

<sup>a</sup> High Btu: > 1000 Btu/scf

<sup>b</sup> Low Btu: 192–1000 Btu/scf

Since flares do not lend themselves to conventional emission testing techniques, only a few attempts have been made to characterize flare emissions. Recent EPA tests using propylene as flare gas indicated that efficiencies of 98 percent can be achieved when burning an offgas with at least 11,200 kJ/m<sup>3</sup> (300 Btu/ft<sup>3</sup>). The tests conducted on steam-assisted flares at velocities as low as 39.6 meters per minute (m/min) (130 ft/min) to 1140 m/min (3750 ft/min), and on air-assisted flares at velocities of 180 m/min (617 ft/min) to 3960 m/min (13,087 ft/min) indicated that variations in incoming gas flow rates have no effect on the combustion efficiency. Flare gases with less than 16,770 kJ/m<sup>3</sup> (450 Btu/ft<sup>3</sup>) do not smoke.

Table 13.5-1 presents flare emission factors, and Table 13.5-2 presents emission composition data obtained from the EPA tests.<sup>1</sup> Crude propylene was used as flare gas during the tests. Methane was a major fraction of hydrocarbons in the flare emissions, and acetylene was the dominant intermediate hydrocarbon species. Many other reports on flares indicate that acetylene is always formed as a stable intermediate product. The acetylene formed in the combustion reactions may react further with hydrocarbon radicals to form polyacetylenes followed by polycyclic hydrocarbons.<sup>2</sup>

In flaring waste gases containing no nitrogen compounds, NO is formed either by the fixation of atmospheric nitrogen (N) with oxygen (O) or by the reaction between the hydrocarbon radicals present in the combustion products and atmospheric nitrogen, by way of the intermediate stages, HCN, CN, and OCN.<sup>2</sup> Sulfur compounds contained in a flare gas stream are converted to SO<sub>2</sub> when burned. The amount of SO<sub>2</sub> emitted depends directly on the quantity of sulfur in the flared gases.

Table 13.5-1 (English Units). EMISSION FACTORS FOR FLARE OPERATIONS<sup>a</sup>

EMISSION FACTOR RATING: B

| Component                       | Emission Factor<br>(lb/10 <sup>6</sup> Btu) |
|---------------------------------|---|
| Total hydrocarbons <sup>b</sup> | 0.14  |
| Carbon monoxide                 | 0.37  |
| Nitrogen oxides                 | 0.068                                       |
| Soot <sup>c</sup>               | 0 - 274                                     |

<sup>a</sup> Reference 1. Based on tests using crude propylene containing 80% propylene and 20% propane.

<sup>b</sup> Measured as methane equivalent.

<sup>c</sup> Soot in concentration values: nonsmoking flares, 0 micrograms per liter (µg/L); lightly smoking flares, 40 µg/L; average smoking flares, 177 µg/L; and heavily smoking flares, 274 µg/L.

TABLE 2-4. OIL AND GAS PRODUCTION OPERATIONS AVERAGE EMISSION FACTORS (kg/hr/source)

| Equipment Type      | Service <sup>a</sup> | Emission Factor (kg/hr/source) <sup>b</sup> |
|---------------------|----------------------|---|
| Valves              | Gas                  | 4.5E-03                                     |
|                     | Heavy Oil            | 8.4E-06                                     |
|                     | Light Oil            | 2.5E-03                                     |
|                     | Water/Oil            | 9.8E-05                                     |
| Pump seals          | Gas                  | 2.4E-03                                     |
|                     | Heavy Oil            | NA  |
|                     | Light Oil            | 1.3E-02                                     |
|                     | Water/Oil            | 2.4E-05                                     |
| Others <sup>c</sup> | Gas                  | 8.8E-03                                     |
|                     | Heavy Oil            | 3.2E-05                                     |
|                     | Light Oil            | 7.5E-03                                     |
|                     | Water/Oil            | 1.4E-02                                     |
| Connectors          | Gas                  | 2.0E-04                                     |
|                     | Heavy Oil            | 7.5E-06                                     |
|                     | Light Oil            | 2.1E-04                                     |
|                     | Water/Oil            | 1.1E-04                                     |
| Flanges             | Gas                  | 3.9E-04                                     |
|                     | Heavy Oil            | 3.9E-07                                     |
|                     | Light Oil            | 1.1E-04                                     |
|                     | Water/Oil            | 2.9E-06                                     |
| Open-ended lines    | Gas                  | 2.0E-03                                     |
|                     | Heavy Oil            | 1.4E-04                                     |
|                     | Light Oil            | 1.4E-03                                     |
|                     | Water/Oil            | 2.5E-04                                     |

<sup>a</sup>Water/Oil emission factors apply to water streams in oil service with a water content greater than 50%, from the point of origin to the point where the water content reaches 99%. For water streams with a water content greater than 99%, the emission rate is considered negligible.

<sup>b</sup>These factors are for total organic compound emission rates (including non-VOC's such as methane and ethane) and apply to light crude, heavy crude, gas plant, gas production, and off shore facilities. "NA" indicates that not enough data were available to develop the indicated emission factor.

<sup>c</sup>The "other" equipment type was derived from compressors, diaphragms, drains, dump arms, hatches, instruments, meters, pressure relief valves, polished rods, relief valves, and vents. This "other" equipment type should be applied for any equipment type other than connectors, flanges, open-ended lines, pumps, or valves.

TABLE 5-2. CONTROL EFFECTIVENESS FOR AN LDAR PROGRAM AT A SOCMI PROCESS UNIT

| Equipment type and service | Control effectiveness (%)                            |  |                          |
|----------------------------|--|--|--------------------------|
|                            | Monthly monitoring<br>10,000 ppmv leak<br>definition | Quarterly monitoring<br>10,000 ppmv leak<br>definition | HON reg neg <sup>a</sup> |
| Valves - gas               | 87   | 67   | 92                       |
| Valves - light liquid      | 84   | 61   | 88                       |
| Pumps - light liquid       | 69   | 45   | 75                       |
| Connectors - all           | b  | b  | 93                       |

<sup>a</sup> Control effectiveness attributable to the requirements of the proposed hazardous organic NESHAP equipment leak negotiated regulation are estimated based on equipment-specific leak definitions and performance levels.

<sup>b</sup> Data are not available to estimate control effectiveness.

**San Juan Gas Plant**  
**Gas Stream Compositions**

| Components     | Gas Analysis Mole Percents, % | C6+ Extended Gas Analysis Mole Percents, % | Combined Analysis Mole Percents, % | Molecular Weights, lb/lb-mole | Component Weights, lb/lb-mole | Weight Percent of Total, % |
|----------------|-------------------------------|--|------------------------------------|-------------------------------|-------------------------------|----------------------------|
| Carbon Dioxide | 1.6534                        |  | 1.6534                             | 44.01                         | 0.73                          | 3.6819                     |
| Nitrogen       | 0.2179                        |  | 0.2179                             | 28.01                         | 0.06                          | 0.3088                     |
| Methane        | 85.0411                       |  | 85.0411                            | 16.04                         | 13.64                         | 69.0199                    |
| Ethane         | 7.3744                        |  | 7.3744                             | 30.07                         | 2.22                          | 11.2203                    |
| Propane        | 3.1599                        |  | 3.1599                             | 44.09                         | 1.39                          | 7.0495                     |
| IsoButane      | 0.5963                        |  | 0.5963                             | 58.12                         | 0.35                          | 1.7537                     |
| Normal Butane  | 0.8422                        |  | 0.8422                             | 58.12                         | 0.49                          | 2.4768                     |
| IsoPentane     | 0.3098                        |  | 0.3098                             | 72.15                         | 0.22                          | 1.1310                     |
| Normal Pentane | 0.2226                        |  | 0.2226                             | 72.15                         | 0.16                          | 0.8128                     |
| C6+            | 0.5824                        | 75.0210                                    | 0.4369                             | 86.18                         | 0.38                          | 1.9053                     |
| Benzene        |                               | 3.2830                                     | 0.0191                             | 78.11                         | 0.01                          | 0.0756                     |
| Ethylbenzene   |                               | 0.0000                                     | 0.0000                             | 106.17                        | 0.00                          | 0.0000                     |
| n-Hexane       |                               | 16.3140                                    | 0.0950                             | 86.17                         | 0.08                          | 0.4143                     |
| Toluene        |                               | 4.4050                                     | 0.0257                             | 92.14                         | 0.02                          | 0.1196                     |
| Xylenes        |                               | 0.9770                                     | 0.0057                             | 106.17                        | 0.01                          | 0.0306                     |
| Total          | 100.0002                      | 100.0000                                   | 100.0002                           |                               | 19.76                         | 100.0000                   |

Gas stream composition obtained from San Juan Gas Plant high-pressure gas analysis dated 09/01/2016

C6+ gas stream composition obtained from San Juan Gas Plant high-pressure C6+ extended gas analysis dated 09/01/2016

Combined carbon dioxide - normal pentane compositions obtained from the high pressure gas analysis

Combined C6+ - xylenes compositions calculated as fractions of the C6+ composition from the gas analysis (using the C6+ -xylene compositions from the C6+ extended gas analysis)

Component Weights (lb/lb-mole) = [Mole Percents (%) / 100] x Molecular Weights (lb/lb-mole)

Weight Percent of Total (%) = 100 x Component Weights (lb/lb-mole) / Total Component Weight (lb/lb-mole)

## high pressure inlet

hp inlet.txt

Monthly Averages from 9/1/2016 9:06:18 AM Analyzer: AT-101  
Company: Daniel Industries

|    |                             |                                       |
|----|-----------------------------|---------------------------------------|
| 15 | Heating Value Gross BTU Dry | S: 2 St2 HP INLET                     |
|    | Start: 9/1/2016 6:00:00 AM  | Stop: 10/1/2016 6:00:00 AM            |
|    |                             | Average Minimum Maximum Samples       |
| 1  | 9/1/2016 6:00:00 AM         | 1174.07568 1153.75647 1194.51965 5573 |
| 2  | 8/1/2016 6:00:00 AM         | 1181.46008 1164.83789 1201.63367 5575 |
| 3  | 7/1/2016 6:00:00 AM         | 1176.96997 1159.90295 1195.20178 5398 |
| 16 | Mole Percent                | S: 2 St2 HP INLET C6+ 47/35/17        |
|    | Start: 9/1/2016 6:00:00 AM  | Stop: 10/1/2016 6:00:00 AM            |
|    |                             | Average Minimum Maximum Samples       |
| 1  | 9/1/2016 6:00:00 AM         | 0.58243 0.36005 0.99600 5573          |
| 2  | 8/1/2016 6:00:00 AM         | 0.69868 0.41300 1.04966 5575          |
| 3  | 7/1/2016 6:00:00 AM         | 0.66511 0.34724 1.06955 5398          |
| 17 | Mole Percent                | S: 2 St2 HP INLET PROPANE             |
|    | Start: 9/1/2016 6:00:00 AM  | Stop: 10/1/2016 6:00:00 AM            |
|    |                             | Average Minimum Maximum Samples       |
| 1  | 9/1/2016 6:00:00 AM         | 3.15993 2.95493 3.43628 5573          |
| 2  | 8/1/2016 6:00:00 AM         | 3.18414 2.85943 3.44514 5575          |
| 3  | 7/1/2016 6:00:00 AM         | 3.13857 2.92294 3.33777 5398          |
| 18 | Mole Percent                | S: 2 St2 HP INLET i-BUTANE            |
|    | Start: 9/1/2016 6:00:00 AM  | Stop: 10/1/2016 6:00:00 AM            |
|    |                             | Average Minimum Maximum Samples       |
| 1  | 9/1/2016 6:00:00 AM         | 0.59634 0.53343 0.65316 5573          |
| 2  | 8/1/2016 6:00:00 AM         | 0.60181 0.55194 0.66427 5575          |
| 3  | 7/1/2016 6:00:00 AM         | 0.59344 0.55728 0.66494 5398          |
| 19 | Mole Percent                | S: 2 St2 HP INLET n-BUTANE            |
|    | Start: 9/1/2016 6:00:00 AM  | Stop: 10/1/2016 6:00:00 AM            |
|    |                             | Average Minimum Maximum Samples       |
| 1  | 9/1/2016 6:00:00 AM         | 0.84222 0.72417 0.95068 5573          |
| 2  | 8/1/2016 6:00:00 AM         | 0.85331 0.79281 0.96238 5575          |
| 3  | 7/1/2016 6:00:00 AM         | 0.83973 0.77067 0.97607 5398          |
| 20 | Mole Percent                | S: 2 St2 HP INLET NEOPENTANE          |
|    | Start: 9/1/2016 6:00:00 AM  | Stop: 10/1/2016 6:00:00 AM            |
|    |                             | Average Minimum Maximum Samples       |
| 1  | 9/1/2016 6:00:00 AM         | 0.00000 0.00000 0.00000 5573          |
| 2  | 8/1/2016 6:00:00 AM         | 0.00000 0.00000 0.00000 5575          |
| 3  | 7/1/2016 6:00:00 AM         | 0.00000 0.00000 0.00000 5398          |
| 21 | Mole Percent                | S: 2 St2 HP INLET i-PENTANE           |
|    | Start: 9/1/2016 6:00:00 AM  | Stop: 10/1/2016 6:00:00 AM            |
|    |                             | Average Minimum Maximum Samples       |
| 1  | 9/1/2016 6:00:00 AM         | 0.30980 0.24259 0.37047 5573          |
| 2  | 8/1/2016 6:00:00 AM         | 0.32486 0.27884 0.38134 5575          |
| 3  | 7/1/2016 6:00:00 AM         | 0.31030 0.27443 0.38084 5398          |
| 22 | Mole Percent                | S: 2 St2 HP INLET n-PENTANE           |
|    | Start: 9/1/2016 6:00:00 AM  | Stop: 10/1/2016 6:00:00 AM            |
|    |                             | Average Minimum Maximum Samples       |
| 1  | 9/1/2016 6:00:00 AM         | 0.22263 0.16947 0.26560 5573          |
| 2  | 8/1/2016 6:00:00 AM         | 0.22773 0.19113 0.27629 5575          |
| 3  | 7/1/2016 6:00:00 AM         | 0.22504 0.18953 0.28085 5398          |
| 23 | Mole Percent                | S: 2 St2 HP INLET NITROGEN            |
|    | Start: 9/1/2016 6:00:00 AM  | Stop: 10/1/2016 6:00:00 AM            |
|    |                             | Average Minimum Maximum Samples       |
| 1  | 9/1/2016 6:00:00 AM         | 0.21786 0.18450 0.32201 5573          |
| 2  | 8/1/2016 6:00:00 AM         | 0.20657 0.17288 0.43284 5575          |
| 3  | 7/1/2016 6:00:00 AM         | 0.21669 0.17485 0.31465 5398          |
| 24 | Mole Percent                | S: 2 St2 HP INLET METHANE             |
|    | Start: 9/1/2016 6:00:00 AM  | Stop: 10/1/2016 6:00:00 AM            |
|    |                             | Average Minimum Maximum Samples       |
| 1  | 9/1/2016 6:00:00 AM         | 85.04111 84.35092 85.67935 5573       |
| 2  | 8/1/2016 6:00:00 AM         | 84.86682 84.06134 85.66080 5575       |

|    |                            |                            |                      |                 |
|----|----------------------------|----------------------------|----------------------|-----------------|
|    |                            | hp inlet.txt               |                      |                 |
| 3  | 7/1/2016 6:00:00 AM        | 85.03612                   | 84.41418             | 85.61156 5398   |
| 25 | Mole Percent               | S: 2 St2 HP                | INLET CARBON DIOXIDE |                 |
|    | Start: 9/1/2016 6:00:00 AM | Stop: 10/1/2016 6:00:00 AM |                      |                 |
|    |                            | Average                    | Minimum              | Maximum Samples |
| 1  | 9/1/2016 6:00:00 AM        | 1.65342                    | 1.39277              | 1.95213 5573    |
| 2  | 8/1/2016 6:00:00 AM        | 1.60686                    | 1.33212              | 1.75570 5575    |
| 3  | 7/1/2016 6:00:00 AM        | 1.64908                    | 1.46705              | 1.84828 5398    |
| 26 | Mole Percent               | S: 2 St2                   | HP INLET ETHANE      |                 |
|    | Start: 9/1/2016 6:00:00 AM | Stop: 10/1/2016 6:00:00 AM |                      |                 |
|    |                            | Average                    | Minimum              | Maximum Samples |
| 1  | 9/1/2016 6:00:00 AM        | 7.37443                    | 6.98323              | 7.91849 5573    |
| 2  | 8/1/2016 6:00:00 AM        | 7.42925                    | 6.87349              | 7.97532 5575    |
| 3  | 7/1/2016 6:00:00 AM        | 7.32588                    | 6.99001              | 7.59158 5398    |
| 27 | User Calc Result           | S: 2 HP Inlet              | NC4+NP               |                 |
|    | Start: 9/1/2016 6:00:00 AM | Stop: 10/1/2016 6:00:00 AM |                      |                 |
|    |                            | Average                    | Minimum              | Maximum Samples |
| 1  | 9/1/2016 6:00:00 AM        | 0.84222                    | 0.72417              | 0.95068 5573    |
| 2  | 8/1/2016 6:00:00 AM        | 0.85331                    | 0.79281              | 0.96238 5575    |
| 3  | 7/1/2016 6:00:00 AM        | 0.83973                    | 0.77067              | 0.97607 5398    |
| 28 | Gallons/1000 SCF C2+       | S: 2 St2 HP                | INLET                |                 |
|    | Start: 9/1/2016 6:00:00 AM | Stop: 10/1/2016 6:00:00 AM |                      |                 |
|    |                            | Average                    | Minimum              | Maximum Samples |
| 1  | 9/1/2016 6:00:00 AM        | 3.75641                    | 3.50112              | 3.99213 5573    |
| 2  | 8/1/2016 6:00:00 AM        | 3.84226                    | 3.60902              | 4.13917 5575    |
| 3  | 7/1/2016 6:00:00 AM        | 3.77377                    | 3.58595              | 3.98715 5398    |



## San Juan Plant Gas Analysis

Sample ID: EXGAS\_9\_1\_2016 9\_

Location:

Injection Date: 9/1/2016

Sample Type:

Method file:: EXGAS

Pressure Base: 14.73

Data File EXGAS\_9\_1\_2016 9\_0

# / MMCF H2O

Notes: CONOCOPHILLIPS HP INLET EXTENDED ANALYSIS FOR AUG. 2016

| Peak Name          | Normal Mole Percent | Normal Weight Percent |
|--------------------|---------------------|-----------------------|
| Methane            | 0.000               | 0.000                 |
| Ethane             | 0.000               | 0.000                 |
| Propane            | 0.000               | 0.000                 |
| i-Butane           | 0.000               | 0.000                 |
| n-butane           | 0.000               | 0.000                 |
| benzene            | 3.283               | 2.871                 |
| i-Pentane          | 0.000               | 0.000                 |
| n-Pentane          | 0.000               | 0.000                 |
| toluene            | 4.405               | 4.543                 |
| cyclohexane        | 8.726               | 8.220                 |
| methylcyclopentane | 9.111               | 8.583                 |
| 2,2-dimethylbutane | 1.939               | 1.870                 |
| 2,3-dimethylbutane | 6.713               | 6.475                 |
| 2-methylpentane    | 16.235              | 15.659                |
| 3-methylpentane    | 8.885               | 8.570                 |
| n-hexane           | 16.314              | 15.736                |
| p&m-xylene         | 0.977               | 1.161                 |
| c-1,3-dimethylcycl | 0.761               | 0.837                 |
| t-1,3-dimethylcycl | 0.193               | 0.212                 |
| o-xylene           | 0.000               | 0.000                 |
| methylcyclohexane  | 8.549               | 9.396                 |
| ethylbenzene       | 0.000               | 0.000                 |
| 2,3-dimethylpentan | 0.875               | 0.981                 |
| 2-methylhexane     | 3.265               | 3.662                 |
| 3-methylhexane     | 2.987               | 3.350                 |
| n-heptane          | 5.074               | 5.691                 |
| 1,2,4-trimethylben | 0.000               | 0.000                 |
| i-propylbenzene    | 0.000               | 0.000                 |
| n-propylbenzene    | 0.000               | 0.000                 |
| 2,5-dimethylhexane | 0.264               | 0.337                 |
| 2,4-dimethylhexane | 0.187               | 0.239                 |
| n-octane           | 1.257               | 1.607                 |
| n-butylbenzene     | 0.000               | 0.000                 |

Sample ID: EXGAS\_9\_1\_2016 9\_

Location:

Injection Date: 9/1/2016

Sample Type:

Method file:: EXGAS

Pressure Base: 14.73

Data File EXGAS\_9\_1\_2016 9\_0

# / MMCF H2O

Notes: CONOCOPHILLIPS HP INLET EXTENDED ANALYSIS FOR AUG. 2016

| <u>Peak Name</u> | <u>Normal Mole Percent</u> | <u>Normal Weight Percent</u> |
|------------------|----------------------------|------------------------------|
| n-nonane         | 0.000                      | 0.000                        |
| n-decane         | 0.000                      | 0.000                        |
| Totals           | 100.000                    | 100.000                      |

Molecular Weight 89.3409

Molar Density 3.0847

Relative Density 3.10741

GPM 39.7442

Cubic Ft. / Gallon 25.10

bi<sup>0.5</sup> 0.022873

Z Factor 0.99229

Uncorrected BTU / Cubic Ft. 4831

Z Corrected BTU / Cubic Ft. 4869

Fuel as Real Gas.


**INSERV**

 INTEGRATED SERVICE COMPANY L.L.C.  
 A WILLBROS COMPANY

 Service: Regen Gas Heater  
 Unit No: San Juan Gas Plant  
 Heater Type: Vertical Cylindrical  
 Owner: ConocoPhillips  
 Purchaser: ConocoPhillips  
 Manufacturer: InServ  
 Date: December 8, 2010

 Item No.: H-501  
 Location: Bloomfield, NM  
 Qty Required: 1  
 Mfr's Ref.: HP-10-313  
 Rev: 0  
 Purch. Ref.: R3-6 Dec 2010  
 Page: 1 of 5

Rev

**PROCESS DESIGN CONDITIONS**

|     |   |             |            |  |
|-----|---|-------------|------------|--|
| 1.  |   |             |            |  |
| 2.  | * Total Heater Absorbed Duty, MM Btu/Hr                 | 10.00       |            |  |
| 3.  | * Operating Case  | Design      |            |  |
| 4.  | Heater Section  | Radiant     | Convection |  |
| 5.  | * Service   | Regen Gas   |            |  |
| 6.  | Heat Absorption, MM Btu/hr                              | 6.79        | 3.21       |  |
| 7.  | * Fluid name  | Residue Gas |            |  |
| 8.  | * Flow Rate, Lb/hr                                      | 33,500      |            |  |
| 9.  | * Flow Rate, BPD  |             |            |  |
| 10. | * Pressure Drop (allowable, clean), psi                 | 10          |            |  |
| 11. | Pressure Drop (calculated, clean), psi                  | 10          |            |  |
| 12. | * Average Heat Flux (allowable), Btu/hr*ft <sup>2</sup> | 9,167       |            |  |
| 13. | Average Heat Flux (calculated), Btu/hr*ft <sup>2</sup>  | 9,170       |            |  |
| 14. | * Maximum Heat Flux (allowable), Btu/hr*ft <sup>2</sup> | 19,800      |            |  |
| 15. | Maximum Heat Flux (calculated), Btu/hr*ft <sup>2</sup>  | 19,810      | 19,009     |  |
| 16. | Velocity Limitation, feet/sec                           |             |            |  |
| 17. | Process Fluid Mass Velocity, Lb/sec*ft <sup>2</sup>     | 51          | 51         |  |
| 18. | * Maximum Film Temperature (allowable), °F              | 800         | 800        |  |
| 19. | Maximum Film Temperature (calculated), °F               | 697         | 453        |  |
| 20. | * Fouling Factor, hr*ft <sup>2</sup> *°F/BTU            | 0.002       | 0.002      |  |
| 21. | * Corrosion or Erosion Characteristics                  |             |            |  |

 [A]  
 [A]  
 [A]  
 [A]

**INLET CONDITIONS:**

|     |  |     |        |  |
|-----|--|-----|--------|--|
| 23. | * Temperature, °F                            | 301 | 160    |  |
| 24. | * Pressure, psia                             | 877 | 879    |  |
| 25. | * Liquid Flow, Lb/hr                         |     | 0      |  |
| 26. | * Vapor Flow, Lb/hr                          |     | 33,500 |  |
| 27. | * Weight Percent Vapor, wt%                  |     | 100%   |  |
| 28. | * Density, Liquid, Lb/ft <sup>3</sup>        |     |        |  |
| 29. | * Molecular Weight, Vapor                    |     | 16.38  |  |
| 30. | * Viscosity, Liquid, cp                      |     |        |  |
| 31. | * Viscosity, Vapor, cp                       |     | 0.014  |  |
| 32. | * Specific Heat, Liquid, Btu/Lb*°F           |     |        |  |
| 33. | * Specific Heat, Vapor, Btu/Lb*°F            |     | 0.622  |  |
| 34. | * Thermal Conductivity, Liquid, Btu/hr*ft*°F |     |        |  |
| 35. | * Thermal Conductivity, Vapor, Btu/hr*ft*°F  |     | 0.026  |  |

**OUTLET CONDITIONS**

|     |  |     |        |  |
|-----|--|-----|--------|--|
| 37. | * Temperature, °F                            | 600 | 301    |  |
| 38. | * Pressure, psia                             | 869 | 877    |  |
| 39. | * Liquid Flow, Lb/hr                         |     | 0      |  |
| 40. | * Vapor Flow, Lb/hr                          |     | 33,500 |  |
| 41. | * Weight Percent Vapor, wt%                  |     | 100.0% |  |
| 42. | * Density, Liquid, Lb/ft <sup>3</sup>        |     |        |  |
| 43. | * Molecular Weight, Vapor                    |     | 16.38  |  |
| 44. | * Viscosity, Liquid, cp                      |     |        |  |
| 45. | * Viscosity, Vapor, cp                       |     | 0.019  |  |
| 46. | * Specific Heat, Liquid, Btu/Lb*°F           |     |        |  |
| 47. | * Specific Heat, Vapor, Btu/Lb*°F            |     | 0.768  |  |
| 48. | * Thermal Conductivity, Liquid, Btu/hr*ft*°F |     |        |  |
| 49. | * Thermal Conductivity, Vapor, Btu/hr*ft*°F  |     | 0.048  |  |

**REMARKS AND SPECIAL REQUIREMENTS:**

|     |   |  |  |  |
|-----|---|--|--|--|
| 50. |   |  |  |  |
| 51. | * Distillation Data or Feed Composition |  |  |  |
| 52. | * Short Term Operating Conditions       |  |  |  |

 53. **NOTES:** [A] Peak flux rate = Average flux rate x 1.8 (CFF) x 1.2 (LFF), Convection peak flux rate not to exceed radiant peak flux rate based on bare tube basis (Per REP 8-2-1 Sect 7.1.3)

54. [B]

|     |  |  |  |
|-----|--|--|--|
| 56. |  |  |  |
| 57. |  |  |  |
| 58. |  |  |  |
| 59. |  |  |  |
| 60. |  |  |  |
| 61. |  |  |  |
| 62. |  |  |  |
| 63. |  |  |  |
| 64. |  |  |  |
| 65. |  |  |  |

| Residue Gas Composition |        |
|-------------------------|--------|
| Component               | Mol%   |
| C1                      | 98.453 |
| C2                      | 0.325  |
| C3                      | 0.007  |
| CO2                     | 0.922  |
| N2                      | 0.293  |
| Total                   | 100.0  |



Service: Regen Gas Heater  
Unit No: San Juan Gas Plant  
Heater Type: Vertical Cylindrical  
Owner: ConocoPhillips  
Purchaser: ConocoPhillips  
Manufacturer: InServ  
Date: December 8, 2010

Item No.: H-501 Rev  
Location: Bloomfield, NM  
Qty Required: 1  
Mfr's Ref.: HP-10-313  
Rev: 0  
Purch. Ref.: R3-6 Dec 2010  
Page: 2 of 5

### COMBUSTION DESIGN CONDITIONS

| Overall Performance:                            | Radiant   | Convection |
|---|-----------|------------|
| Operating Case                                  | Design    |            |
| Type of Fuel                                    | Fuel Gas  |            |
| Service   | Regen Gas |            |
| Excess Air, Percent                             | 15.0%     |            |
| Calculated Heat Release, MMBtu/hr (LHV)         | 12.13     |            |
| Guaranteed Efficiency, Percent (LHV)            | 81.5%     |            |
| Calculated Efficiency, Percent (LHV)            | 82.5%     |            |
| Radiation Loss, % of Heat Release (LHV)         | 2.0%      |            |
| Flue Gas Temperature Leaving Section °F         | 1,503     | 664        |
| Flue Gas Mass Velocity, Lb/sec*ft2              |           | 0.244      |
| Draft at Arch / Bridgwall, in H2O               | 0.10      |            |
| Ambient Temperature, Efficiency Calculation, °F | 60        |            |
| Ambient Temperature, Stack Design, °F           | 110       |            |
| Altitude Above Sea Level, ft                    | 5600      |            |
| Atmospheric Pressure, psia                      | 11.96     |            |
| Volumetric Heat Release, MM Btu/hr*ft3          | 10,100    |            |

### FUEL CHARACTERISTICS

| FUEL GAS             | Fuel Gas |        | Fuel Oil              | #1 FO | #2 FO |
|----------------------|----------|--------|-----------------------|-------|-------|
| LHV, Btu/scf         | 898      |        | LHV, Btu/Lb           |       |       |
| HHV, Btu/scf         |          |        | HHV, Btu/Lb           |       |       |
| Press @ Burner, psig | 25       |        | Press @ Burner, psig  |       |       |
| Temp @ Burner, °F    | 40 min   |        | Temp @ Burner, °F     |       |       |
| Molecular Weight     | 16.41    |        | Viscosity @ ??? °F    |       |       |
| Component            | Mole %   | Mole % | @ ??? °F              |       |       |
| H2                   |          |        | Atomizing Media       |       |       |
| O2                   |          |        | Atomizing Media P & T |       |       |
| N2                   | 0.363    |        | Component             | Wt %  | Wt %  |
| CO                   |          |        |                       |       |       |
| CO2                  | 0.951    |        |                       |       |       |
| H2O                  |          |        |                       |       |       |
| C1                   | 98.258   |        |                       |       |       |
| C2                   | 0.413    |        |                       |       |       |
| C2=                  |          |        |                       |       |       |
| C3                   | 0.015    |        |                       |       |       |
| C3=                  |          |        |                       |       |       |
| iC4                  |          |        |                       |       |       |
| nC4                  |          |        |                       |       |       |
| C4=                  |          |        |                       |       |       |
| iC5                  |          |        | Sulphur (wt%)         |       |       |
| nC5                  |          |        | Nitrogen (wt%)        |       |       |
| C6+                  |          |        | Nickel (ppm)          |       |       |
| H2S                  |          |        | Vanadium (ppm)        |       |       |
| S                    |          |        | Sodium (ppm)          |       |       |
|                      |          |        | Ash (wt%)             |       |       |

### BURNER DATA:

|                                     |                  |                |          |                        |                |
|-------------------------------------|------------------|----------------|----------|------------------------|----------------|
| Mfr                                 | CTI/JZC/Zeeco    | Qty of Burners | 3        | Pilot Model No.        | Self Inspiring |
| Type                                | Low Nox          | Draft, inH2O   | 0.25     | Pilot Ht. Rel., Btu/hr | 95,000         |
| Model                               | TBD              | Reed Wall      | None     | Pilot Ignition Method  | MANUAL         |
| Location                            | Floor / Upfiring | Burner Test    | Optional | Flame Rod Location     | Pilot          |
| Heat Release per Burner, MMBTU / hr |                  | Maximum        | Normal   | Minimum                | Turndown       |
|                                     |                  | 4.85           | 4.04     | 1.62                   | 3.0            |

### Burner Clearances (Gas Firing):

|                                     | Vertical to<br>Tube Centerline | Vertical to<br>Refractory | Horiz to<br>Tube C/L + 6" | Horizontal to<br>Refractory |
|-------------------------------------|--------------------------------|---------------------------|---------------------------|-----------------------------|
| Burner Centerline Clearance, Ft     |                                |                           |                           |                             |
| API Std 560 Required Clearances, ft | 14.66                          | 14.66                     | 3.21                      | n / a                       |
| Calculated Clearances, ft           | 17.50                          | 16.35                     | 3.25                      | n / a                       |

### Emissions

|   |            |          |  |  |
|---|------------|----------|--|--|
| Required Emissions, Lb/MMBTU @ 3%O2 (HHV)   | NOx: 0.045 |          |  |  |
| Guaranteed Emissions, Lb/MMBTU @ 3%O2 (HHV) | NOx: 0.045 | CO: 0.02 |  |  |

### NOTES:



**INSERV**  
INTEGRATED SERVICE COMPANY LLC  
A WILLERDS COMPANY



Service: Regen Gas Heater  
Unit No: San Juan Gas Plant  
Heater Type: Vertical Cylindrical  
Owner: ConocoPhillips  
Purchaser: ConocoPhillips  
Manufacturer: InServ  
Date: December 8, 2010

Item No.: H-501  
Location: Bloomfield, NM  
Qty Required: 1  
Mfr's Ref.: HP-10-313  
Rev: 0  
Purch. Ref.: R3-6 Dec 2010  
Page: 3 of 5

Rev

### MECHANICAL DESIGN CONDITIONS

|    |                                     |                    |                        |                       |
|----|-------------------------------------|--------------------|------------------------|-----------------------|
| 1. | Plot Limitations                    | None               | Stack Limitations      | None                  |
| 2. | Tube Limitations                    | None               | Noise Limitations, dBA | 85.0                  |
| 3. | Structural Design Data              | Wind Velocity, MPH | 90                     | Wind Specification    |
| 4. |                                     | Snowload           | 30 psf                 | ASCE 7-05             |
| 5. |                                     | Importance Factor  | 1                      | Seismic Specification |
| 6. |                                     | Wind Exposure      | C                      | Seismic Zone          |
| 7. |                                     |                    | -20 / 60 / 105         | Firebox Pressure      |
| 8. | Min / Max Ambient Air Temperature F |                    |                        | Relative Humidity     |
| 9. |                                     |                    |                        | 20%                   |

### COIL DESIGN

|     |  |             |             |  |
|-----|--|-------------|-------------|--|
| 10. | Heater Section   | Radiant     | Convection  |  |
| 11. | Service  | Regen Gas   |             |  |
| 12. | Design Basis for Tube Wall Thickness                     | API Std 530 | API Std 530 |  |
| 13. | Design Pressure (elastic or rupture), psig               | 1,010       | 1,010       |  |
| 14. | Design Life, hours                                       | 100,000     | 100,000     |  |
| 15. | Design Fluid Temperature, °F                             | 750         | 750         |  |
| 16. | Temperature Allowance, °F                                | 90          | 90          |  |
| 17. | Corrosion Allowance, Tubes & Fittings, in                | 0.125       | 0.125       |  |
| 18. | Supplementary Mfg Requirements                           | None        | None        |  |
| 19. | Stress Relieve (yes or no)                               | No          | No          |  |
| 20. | Weld Inspection, (RT or other)                           | 100 of 100% | 100 of 100% |  |
| 21. | Hydrostatic Test Pressure, psig                          | 3,322       | 3,322       |  |
| 22. | Max Tube Wall Temperature (clean), °F                    | 722         | 487         |  |
| 23. | Max Tube Wall Temperature (fouled), °F                   | 750         | 531         |  |
| 24. | Max Tube Wall Temperature (design), °F                   | 840         |             |  |
| 25. | Inside Film Coefficient, BTU / hr * ft <sup>2</sup> * °F | 196         | 144         |  |

### COIL ARRANGEMENT

|     |   |             |            |  |
|-----|---|-------------|------------|--|
| 27. | Tube Orientation: Vertical / Horizontal               | Vertical    | Horizontal |  |
| 28. | Pipe/Tube Material (ASTM Spec and Gr)                 | A106 GrB    | A106 GrB   |  |
| 29. | Pipe/Tube Outside Diameter, in                        | 6.625       | 6.625      |  |
| 30. | Tube Wall Thickness, (average), in                    | 0.432       | 0.432      |  |
| 31. | Number of Flow Passes                                 | 1           | 1          |  |
| 32. | Number of Tubes per Row (convection)                  |             | 3          |  |
| 33. | Overall Tube Length, ft                               | 13.25       | 12.25      |  |
| 34. | Effective Tube Length, ft                             | 15.25       | 10.50      |  |
| 35. | No of intermediate welds per tube                     | None        | None       |  |
| 36. | Bare Tubes: Number                                    | 28 (6 / 22) | 9          |  |
| 37. | Bare Tubes Total Exposed Surface, ft <sup>2</sup>     | 741         | 164        |  |
| 38. | Extended Surface Tubes: Number                        | 0           | 9          |  |
| 39. | Extended Tubes Total Exposed Surface, ft <sup>2</sup> | 0           | 1,115      |  |
| 40. | Tube Spacing, Center to Center, in                    | 18 / 12     | 12         |  |
| 41. | Tube Center to Furnace Wall, in                       | 9           | 6          |  |

### DESCRIPTION OF EXTENDED SURFACE:

|     |  |                                    |             |  |
|-----|--|------------------------------------|-------------|--|
| 43. | Service                                    | Regen Gas                          |             |  |
| 44. | Fin or Stud Row Number (starting @ bottom) | Rows 1-3                           | Rows 4-6    |  |
| 45. | Type (segmented fins, solid fins, studs)   | Bare                               | HF Solid    |  |
| 46. | Fin/Stud Material                          |                                    | 11CR        |  |
| 47. | Dimensions                                 | Height x thickness / dia)          | 0.75 x 0.05 |  |
| 48. |  | Density (fins / in, studs / plane) | 3.5 fpi     |  |
| 49. | Maximum Fin/Stud Temperature, °F           |                                    | 695         |  |

### RETURN BENDS &/OR PLUG TYPE FITTINGS:

|     |   |                 |            |  |
|-----|---|-----------------|------------|--|
| 51. | Heater Section                                  | Radiant         | Convection |  |
| 52. | Fitting Type                                    | LR & SR U Bends | SR U Bends |  |
| 53. | Material (ASTM Spec and Gr)                     | A234 WPB        | A234 WPB   |  |
| 54. | Nominal Rating or Schedule                      | 6" sch80        | 6" sch80   |  |
| 55. | Location (internal, external, one or both ends) | Internal        | External   |  |
| 56. | Welded or Rolled                                | welded          | welded     |  |

### CROSSOVERS:

|     |                                   |                   |  |
|-----|-----------------------------------|-------------------|--|
| 58. | Location/Welded or Flanged        | External / Welded |  |
| 59. | Pipe Material (ASTM Spec and Gr)  | A106 GrB          |  |
| 60. | Pipe Size & Schedule or Thickness | 6" sch80          |  |
| 61. | Flange Material                   |                   |  |
| 62. | Flange Size & Rating              |                   |  |

NOTES: [A] Last six (6) tubes of radiant section are on 18" centers (LR), all others are on 12" centers (SR).


**INSERV**

 INTEGRATED SERVICE COMPANY LLC  
 A WILLBROS COMPANY

 Service: Regen Gas Heater  
 Unit No: San Juan Gas Plant  
 Heater Type: Vertical Cylindrical  
 Owner: ConocoPhillips  
 Purchaser: ConocoPhillips  
 Manufacturer: InServ  
 Date: December 8, 2010

 Item No.: H-501  
 Location: Bloomfield, NM  
 Qty Required: 1  
 Mfr's Ref.: HP-10-313  
 Rev: 0  
 Purch. Ref.: R3-6 Dec 2010  
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**MECHANICAL DESIGN CONDITIONS (continued)**

|                |           |            |  |  |
|----------------|-----------|------------|--|--|
| Heater Section | Radiant   | Convection |  |  |
| Service        | Regen Gas | Regen Gas  |  |  |

**TERMINALS &/OR MANIFOLDS:**

|  |                 |                 |  |  |
|--|-----------------|-----------------|--|--|
| Type (Bev=Beveled, Man=Manifold, Flg=Flanged)  | Flanged         | Flanged         |  |  |
| Terminal / Manifold Location                   | Rad. Roof       | Terminal End    |  |  |
| Terminals                                      |                 |                 |  |  |
| Flange Material (ASTM Spec and Gr)             | A105            | A105            |  |  |
| Tube Flange Size and Rating                    | 6" / 900# RTJWN | 6" / 900# RTJWN |  |  |
| Number of Terminals                            |                 |                 |  |  |
| Manifolds                                      |                 |                 |  |  |
| Manifold Material (ASTM Spec and Gr)           | None            | None            |  |  |
| Manifold Size & Thickness                      |                 |                 |  |  |
| Manifold Flange Size and Rating                |                 |                 |  |  |
| Manifold to Tube Conn (Welded, Extruded, Etc.) |                 |                 |  |  |

**TUBE SUPPORTS &/OR TUBESHEETS:**

|                              |                          |                 |  |  |
|------------------------------|--------------------------|-----------------|--|--|
| Location (Top, Bottom, Ends) | Top                      | Ends            |  |  |
| Material (ASTM Spec and Gr)  | A351 HK40-min 0.35 wt% C | A-36 C.S.       |  |  |
| Design Metal Temperature, F  | 1,800                    | 800             |  |  |
| Support Thickness, in        |                          | 0.50"           |  |  |
| Refractory Type              |                          | 4 / LW Castable |  |  |
| Refractory Thickness, in     |                          | 4               |  |  |
| Anchor Material and Type     |                          | 304 S.S.        |  |  |

**INTERMEDIATE TUBE SUPPORTS**

|                             |  |  |  |  |
|-----------------------------|--|--|--|--|
| Quantity per Length         |  |  |  |  |
| Material (ASTM Spec and Gr) |  |  |  |  |
| Spacing, ft                 |  |  |  |  |
| Design Metal Temperature, F |  |  |  |  |

**TUBE GUIDES**

|                             |         |  |  |  |
|-----------------------------|---------|--|--|--|
| Location                    | Bottom  |  |  |  |
| Material (ASTM Spec and Gr) | 304SS   |  |  |  |
| Spacing, in                 | 18 / 12 |  |  |  |

**REFRACTORY DESIGN**

Refractory Design Basis: 180°F Casing Temperature w/ Ambient Conditions of 0 MPH &amp; 80°F

|  |                 |                 |               |
|--|-----------------|-----------------|---------------|
| <b>Radiant Casing/Refractory Design:</b>     | <b>Floor</b>    | <b>Shielded</b> | <b>Arch</b>   |
| Refractory Thickness, in                     | 9.5             | 3.0             | 5.0           |
| Refractory Hot Face Temp (design), °F        | 2,500°          | 2,300°          | 2,300°        |
| Refractory Hot Face Temp (calculated), °F    | 1,303           | 1,209           | 1,503         |
| Hot Face Layer Thickness, in / Material      | 2.5/HD FBrick   | 1 / 8 pcf CFB   | 1 / 8 pcf CFB |
| Back-Up Layer No1 Thickness, in / Material   | 7 / LW Castable | 2 / 8 pcf CFB   | 4 / 8 pcf CFB |
| Back-Up Layer No2 Thickness, in / Material   | None            | None            | None          |
| Foil Vapor Barrier Thickness, mil / Material | None            | None            | None          |
| Castable Reinforcement (SS Needles)          | None            | None            | None          |
| Anchors / Tie Backs:                         | None            | Pins & Clips    | Pins & Clips  |
| Anchor/Tie Back Material                     | None            | 304 S.S.        | 310 S.S.      |
| Casing Thickness, in / Material              | 1/4 - A36       | 1/4 - A36       | 1/4 - A36     |
| Casing External Temperature, °F              | 195             | 180             | 180           |
| Comments / Clarifications                    | 10' min.elev.   | (w/o wraps)     | (w/ wraps)    |

|  |                     |                  |                  |
|--|---------------------|------------------|------------------|
| <b>Convection Casing/Refractory Design:</b>  | <b>Sidewalls</b>    | <b>Hdr Boxes</b> | <b>Breeching</b> |
| Refractory Thickness, in                     | 6.5                 | 2.0              | 3.0              |
| Refractory Hot Face Temp (design), °F        | 2,200°              | 2,300°           | 2,200°           |
| Refractory Hot Face Temp (calculated), °F    | 1,084               | 902              | 664              |
| Hot Face Layer Thickness, in / Material      | 6 1/2 / LW Castable | 2 / 8 pcf CFB    | 3 / LW Castable  |
| Back-Up Layer No1 Thickness, in / Material   | None                | None             | None             |
| Back-Up Layer No2 Thickness, in / Material   | None                | None             | None             |
| Foil Vapor Barrier Thickness, mil / Material | None                | None             | None             |
| Castable Reinforcement (SS Needles)          | 304SS - 3 wt%       | None             | 304SS - 3 wt%    |
| Anchors / Tie Backs:                         | Longhorns           | Pins & Clips     | Longhorns        |
| Anchor/Tie Back Material                     | 304 S.S.            | 304 S.S.         | 304 S.S.         |
| Anchor/Tie Back Attachment                   | Welded              | Welded           | Welded           |
| Casing Thickness, in / Material              | 3/16 - A36          | 3/16 - A36       | 3/16 - A36       |
| Casing External Temperature, °F              | 180                 | 180              | 180              |
| Comments / Clarifications                    |                     |                  |                  |

**NOTES:** [A] Floor refractory and firebrick will be field installed and therefore no anchors are required per API 560.

**INSERV**INTEGRATED SERVICE COMPANY LLC  
A WILLBROS COMPANY

Service: Regen Gas Heater  
 Unit No: San Juan Gas Plant  
 Heater Type: Vertical Cylindrical  
 Owner: ConocoPhillips  
 Purchaser: ConocoPhillips  
 Manufacturer: InServ  
 Date: December 8, 2010

Item No.: H-501  
 Location: Bloomfield, NM  
 Qty Required: 1  
 Mfr's Ref.: HP-10-313  
 Rev: 0  
 Purch. Ref.: R3-6 Dec 2010  
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**MECHANICAL DESIGN CONDITIONS (continued)****STACK OR STUB STACK:**

| Quantity         | One             | Type                     | Self Supporting  | Location          | on Heater        |
|------------------|-----------------|--------------------------|------------------|-------------------|------------------|
| Casing Material  | A-36 C.S.       | Corrosion Allowance, in  | 0.063            | Min Thickness, in | 0.25             |
| Metal OD, ft     | 3.08            | Height Above Grade, ft   | 78.3             | Stack Length, ft  | 40               |
| Lining Material  | 2 / LW Castable | Anchor (Material & Type) | 304SSS Bent Wire | Clarifications    | Top 3' - 316L SS |
| Extent of Lining | Full            | Lining Reinforcement     | 304SS - 3 wt%    |                   | Rain hat req'd   |

**DAMPERS:**

| Location                                      | Stack   |  |  |  |
|---|---------|--|--|--|
| Type (Control, Balance, Tight Shut-off, Etc.) | Control |  |  |  |
| Material Blade                                | 316L SS |  |  |  |
| Shaft   | 316L SS |  |  |  |
| Multiple / Single Leaf                        | Single  |  |  |  |
| Provision for Operation (Manual / Automatic)  | Manual  |  |  |  |
| Type of Operator (Cable / Pneumatic)          | Cable   |  |  |  |
| Operator Location                             | Grade   |  |  |  |

**LADDERS AND PLATFORMS (GALVANIZED CS)**

| Location            | Qty              | Width | Length/Arc | Stairs/Ladder | Access From | Estim'd Weight |
|---------------------|------------------|-------|------------|---------------|-------------|----------------|
| Hearth Platform     | 1                | 3.00  | 360        | 0 / 2         | Grade       | 5,770          |
| Conv. End Platforms | 2                | 4.00  | 5.61       | 0 / 1         | Hearth      | 6,720          |
| Conv. Side Platform | 2                | 3.00  | 21.75      |               |             |                |
| Damper Platform     | 1                | 3.00  | 270        | 0 / 1         | Convection  | 2,230          |
| EPA Platform        | 1                | 3.00  | 270        | 0 / 1         | Damper      | 2,090          |
| Type of Handrails   | Angle Frames     |       |            |               |             |                |
| Type of Flooring    | Serrated Grating |       |            |               |             |                |

**DOORS:**

| Type         | Number | Location      | Size    | Bolted/Hinged |
|--------------|--------|---------------|---------|---------------|
| Access Doors | 1      | Floor         | 18 x 18 | Bolted        |
|              | 1      | Arch          | 24 x 24 | Bolted        |
|              | 1      | Transition    | 24 x 24 | Bolted        |
| Observation  | 3      | Hearth        | 9 x 9   | Hinged        |
|              | 1      | Conv Sidewall | 6 x 18  | Hinged        |
| Tube Removal | 1      | Arch          | 24 x 24 | Bolted        |

**MISCELLANEOUS CONNECTIONS:**

| Instrument Connections     | Number | Size | Type        |
|----------------------------|--------|------|-------------|
| Combustion Air Temperature |        |      |             |
| Pressure                   |        |      |             |
| Flue Gas Temperature       | 4      | 1½"  | 150# RFWN   |
| Pressure                   | 4      | 1½"  | 150# RFWN   |
| Flue Gas Sample            | 4      | 1½"  | 150# RFWN   |
| Snuffing Steam / Purge     | 1      | 2"   | 150# RFWN   |
| O2/Combustible Analyzer    | 4      | 3"   | 150# RFWN   |
| EPA Testing Connections    | 4      | 4"   | 150# RFWN   |
| Vents / Drains             |        |      |             |
| Process Fluid Temperature  | 1      | 1½"  | 900# RTJWN  |
| Tubeskin Thermocouples     | 2      | 1"   | Pipe Sleeve |

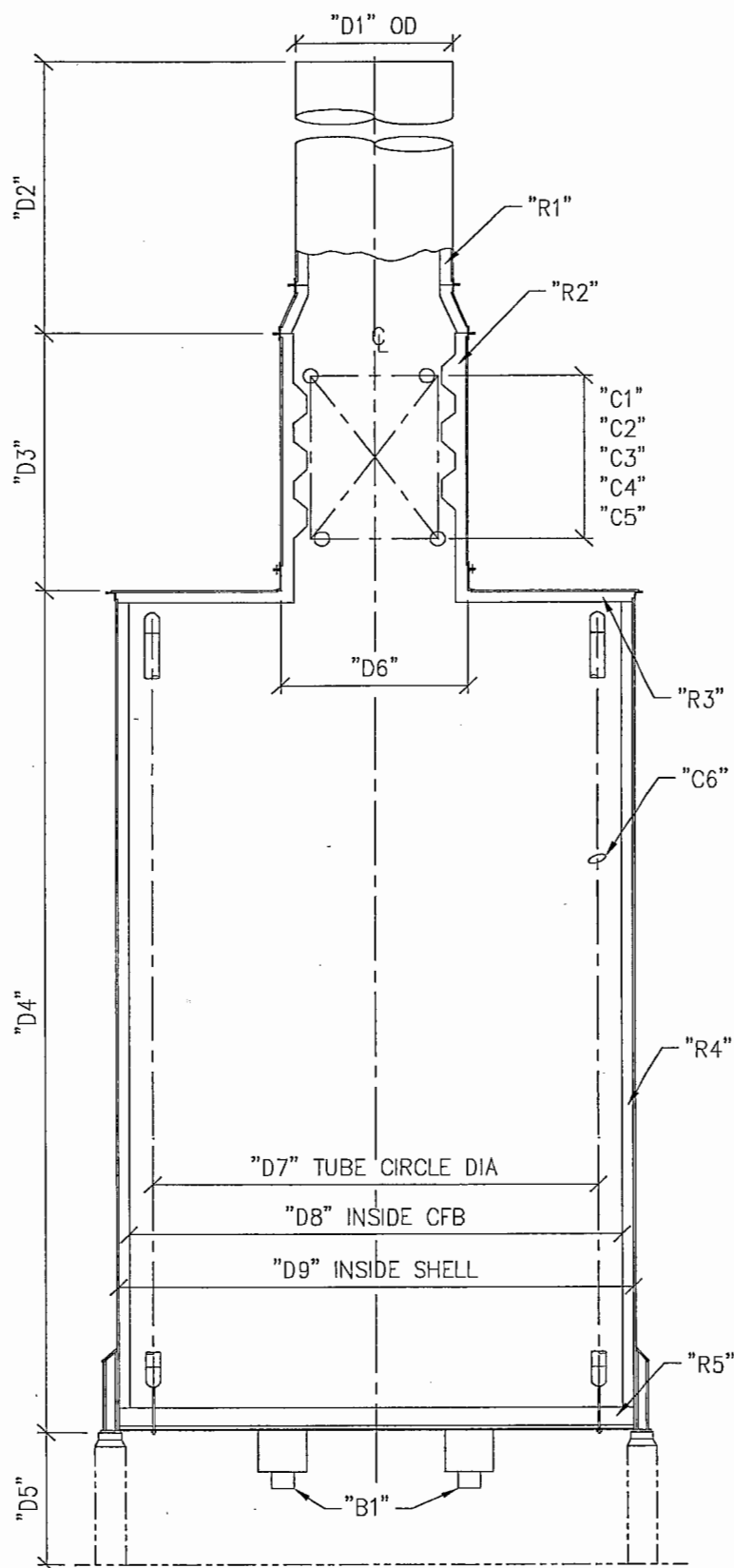
**COATING REQUIREMENTS**

|  |  |
|--|--|
| External Coatings & Preparatory Blast (SSPC) | SSPC-SP10 + 2½-3½ mils dft of IOZ Primer + 4-5 mils dft Epoxy Mastic + 2-2½ mils dft Polyurethane per Coating System 1 |
| Internal Coatings & Preparatory Blast (SSPC) | SSPC-SP6 + 8-10 mils Coal Tar Epoxy on all surfaces under refractory except floor and tubesheets                       |
| Galvanizing Requirements                     | All ladders and platforms  |

**SPECIAL EQUIPMENT**

|               |  |
|---------------|--|
| Sootblowers   |  |
| Air Preheater |  |
| Fan(s)        |  |
| Other         |  |

**NOTES:**



#### COIL INFORMATION

|      |                     |
|------|---------------------|
| "C1" |                     |
| "C2" |                     |
| "C3" | 2 Future Rows       |
| "C4" | 3 Rows Finned Tubes |
| "C5" | 3 Rows Bare Tubes   |
| "C6" | 28 Tubes            |

#### INSULATION

|      |                            |
|------|----------------------------|
| "R1" | 2" LW Castable             |
| "R2" | 6½" LW Castable            |
| "R3" | 5" Ceramic Fiber           |
| "R4" | 3" Ceramic Fiber           |
| "R5" | 2.5" HDFB + 7" LW Castable |

#### BURNER

|      |                       |
|------|-----------------------|
| "B1" | 3 Burners (BCD=3'-6") |
|------|-----------------------|

#### DIMENSIONS

|      |                    |
|------|--------------------|
| "D1" | 3'-1"              |
| "D2" | 40'-0"             |
| "D3" | 10'-7"             |
| "D4" | 17'-9"             |
| "D5" | 10'-0" (By others) |
| "D6" | 4'-7"              |
| "D7" | 10'-0"             |
| "D8" | 11'-6"             |
| "D9" | 12'-0"             |

#### Estimated Total Weight (Lbs)

|                         |        |
|-------------------------|--------|
| Radiant Section         | 31,000 |
| Convection Section      | 29,900 |
| Stack / Transition      | 11,800 |
| Misc - Ship Loose Items | 10,000 |
| Ladders and Platforms   | 16,810 |

All dimensions are estimated. Final dimensions to be supplied with General Arrangement Package



**INSERV**

INTEGRATED SERVICE COMPANY LLC  
A WILLBROS COMPANY



ConocoPhillips / Regen Gas Heater  
Proposal Sketch

|       |         |           |     |
|-------|---------|-----------|-----|
| DRAWN | ELM     | DWG NO    | REV |
| DATE  | 12/8/10 | HP-10-313 | 0   |
| SCALE | NONE    |           |     |

**INSERV**INTEGRATED SERVICE COMPANY, LLC  
A WILLBROS COMPANY

Service: Regen Gas Heater  
Unit No: San Juan Gas Plant  
Heater Type: Vertical Cylindrical  
Owner: ConocoPhillips  
Purchaser: ConocoPhillips  
Manufacturer: InServ  
Date: Dec 13, 2010

Item No.: H-501  
Location: Bloomfield, NM  
Qty Required: 1  
Mfg's Ref.: HP-10-313  
Rev: 0  
Purch. Ref.:  
Page: 1 of 3

**GENERAL DATA :**

|  |                                      |
|--|--------------------------------------|
| TYPE OF HEATER                                 | Vertical Cylindrical                 |
| ALTITUDE ABOVE SEA LEVEL, FT.                  | 5600                                 |
| AIR SUPPLY                                     |                                      |
| AMBIENT / PREHEATED AIR                        | Ambient                              |
| TEMPERATURE, F (MIN./MAX./DESIGN)              | -20 / 60 / 105                       |
| RELATIVE HUMIDITY, %                           | 20%                                  |
| DRAFT TYPE                                     | Natural Draft                        |
| TOTAL DRAFT AVAILABLE, : ACROSS BURNER, IN H2O | 0.25                                 |
| INCLUDING DRAFT ACROSS PLENUM, IN H2O          | 0.05                                 |
| REQUIRED TURNDOWN                              | 3:1                                  |
| HEATER FLOOR LINING THICKNESS, IN.             | 9.5 (7.0" Castable + 2.5" Firebrick) |
| HEATER CASING THICKNESS, IN.                   | 0.25                                 |
| FIREBOX HEIGHT, FT                             | 15.5'                                |
| TUBE CIRCLE DIAMETER, FT.                      | 10.0'                                |

**BURNER DATA :**

|  |                                       |
|--|---------------------------------------|
| MANUFACTURER                                   | TBD                                   |
| TYPE OF BURNER                                 | Lo-NOx                                |
| MODEL / SIZE                                   | TBD                                   |
| DIRECTION OF FIRING                            | Vertical Up                           |
| LOCATION ( ROOF / FLOOR / SIDEWALL )           | Floor                                 |
| NUMBER REQUIRED                                | 3                                     |
| MINIMUM DISTANCE BURNER CENTERLINE: FT:        |                                       |
| TO TUBE CENTERLINE ( HORIZ / VERT )            | 3.25' (Horizontal) / 17.5' (Vertical) |
| TO ADJACENT BURNER CENTERLINE ( HORIZ / VERT ) | 3.06' Horiz                           |
| TO UNSHIELDED REFRACTORY ( HORIZ / VERT )      | 16.33' Vertically                     |
| BURNER CIRCLE DIAMETER, FT.                    | 3.50'                                 |
| PILOTS :                                       |                                       |
| NUMBER REQUIRED                                | 1 / Burner                            |
| TYPE   | Self Inspiring                        |
| IGNITION METHOD                                | Manual                                |
| FUEL   | Nat Gas                               |
| FUEL PRESSURE,PSIG                             | 7-10                                  |
| CAPACITY,MMBTU / HR                            | .095 MIN                              |

**OPERATING DATA :**

|  |               |
|--|---------------|
| FUEL                                       | Fuel Gas      |
| HEAT RELEASE PER BURNER, MMBTU / HR. (LHV) |               |
| DESIGN                                     | 4.85          |
| NORMAL                                     | 4.04          |
| MINIMUM                                    | 1.62          |
| EXCESS AIR @ DESIGN HEAT RELEASE, (%)      | 15%           |
| AIR TEMPERATURE,F                          | 60            |
| DRAFT (AIR PRESSURE) LOSS,IN H2O           |               |
| DESIGN                                     | 0.25          |
| NORMAL                                     | 0.25          |
| MINIMUM                                    | 0.25          |
| FUEL PRESSURE AVAILABLE,PSIG               | 25            |
| FLAME LENGTH @ DESIGN HEAT RELEASE, FT.    | Maximum 10.5' |
| FLAME SHAPE ( ROUND, FLAT, ETC. )          | ROUND         |
| ATOMIZING MEDIUM / OIL RATIO, LB/LB        | N/A           |

**NOTES :**

**INSERV**INTEGRATED SERVICE COMPANY LLC  
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**GAS FUEL CHARACTERISTICS****FUEL TYPE**

HEATING VALVE (LHV), Btu/scf

HEATING VALVE (HHV), Btu/scf

SPECIFIC GRAVITY @ 60° F (AIR = 1.0)

MOLECULAR WEIGHT

FUEL TEMPERATURE @ BURNER, °F

FUEL PRESSURE, AVAILABLE @ BURNER, PSIG

FUEL GAS COMPOSITION, VOLUME % (DRY)

HYDROGEN

OXYGEN

NITROGEN

CARBON MONOXIDE

CARBON DIOXIDE

WATER

METHANE

ETHANE

ETHYLENE

PROPANE

PROPYLENE

I- BUTANE

N-BUTANE

BUTALENE

I-PENTANE

N-PENTANE

N-HEXANE

HYDROGEN SULFIDE

SULFUR

TOTAL

**Fuel Gas**

898

16.41

Ambient

25

0.363

0.951

98.258

0.413

0.015

100

**LIQUID FUEL CHARACTERISTICS****FUEL TYPE**

HEATING VALUE (LHV), BTU / LB.

SPECIFIC GRAVITY / DEG. API

H / C RATIO ( BY WEIGHT )

VISCOSITY, @ F. ( SSU )

@ F. ( SSU )

VANADIUM,PPM

SODIUM,PPM

POTASSIUM,PPM

NICKEL,PPM

FIXED NITROGEN,PPM

SULFUR,% WT.

ASH,% WT.

WATER,% WT.

DISTILLATION :ASTM INITIAL BOILING POINT,F.

ASTM MID-POINT,F.

ASTM END-POINT,F.

FUEL TEMPERATURE @ BURNER,F.

FUEL PRESSURE AVAILABLE @ BURNER,PSIG.

ATOMIZING MEDIUM: AIR / STEAM / MECHANICAL

TEMPERATURE,F.

PRESSURE. PSIG.

NOTES :

**INSERV**INTEGRATED SERVICE COMPANY LLC  
A WILLBROS COMPANYService: Regen Gas Heater  
Unit No: San Juan Gas Plant  
Heater Type: Vertical Cylindrical  
Owner: ConocoPhillips  
Purchaser: ConocoPhillips  
Manufacturer: InServ  
Date: Dec 13, 2010Item No.: H-501  
Location: Bloomfield, NM  
Qty Required: 1  
Mfg's Ref.: HP-10-313  
Rev: 0  
Purch. Ref.: 0  
Page: 3 of 3**MISCELLANEOUS**

|                     |  |                                       |
|---------------------|--|---------------------------------------|
| BURNER PLENUM :     | COMMON / INTEGRAL                                  | INTEGRAL                              |
|                     | MATERIAL   | CARBON STEEL                          |
|                     | PLATE THICKNESS, IN.                               |                                       |
|                     | INTERNAL INSULATION                                |                                       |
| INLET AIR CONTROL : | DAMPER OR REGISTERS                                | DAMPER                                |
|                     | MODE OF OPERATION                                  | MANUAL                                |
|                     | LEAKAGE, %   | 5% OF AIR FLOW AT NORMAL HEAT RELEASE |
| BURNER TILE :       | COMPOSITION  | By Burner Vendor                      |
|                     | MAXIMUM SERVICE TEMPERATURE, F                     | By Burner Vendor                      |
|                     | NOISE SPECIFICATION                                | 85 dba @ 3FT                          |
|                     | ATTENUATION METHOD                                 |                                       |
|                     | BURNER / PILOT FUEL CONNECTION                     | Flanged / Flanged                     |
|                     | PAINTING REQUIREMENTS                              | Per manufacturers standards           |
|                     | IGNITION PORT : SIZE / NO.                         | 2" / 1 per burner                     |
|                     | SIGHT PORT : SIZE / NO.                            | 2" / 1 per burner                     |
|                     | FLAME DETECTION :                                  |                                       |
|                     | NUMBER   |                                       |
|                     | SCANNER CONNECTION SIZE / NO.                      | 2" / 1 per burner                     |
|                     | SAFETY INTERLOCK SYSTEM FOR ATOMIZING MEDIUM & OIL | N/A                                   |
|                     | PERFORMANCE TEST REQUIRED( YES OR NO )             | Optional                              |

**EMISSION REQUIREMENTS :**

|                                    |                    |
|------------------------------------|--------------------|
| FIREBOX BRIDGEWALL TEMPERATURE, F. | 1503 AT BRIDGEWALL |
| NOx * LB/MMBTU (HHV)               | 0.045              |
| CO * LB/MMBTU (HHV)                | 0.02               |
| VOC * LB/MMBTU (HHV)               |                    |
| PM * LB/MMBTU (HHV)                |                    |
| PM10 * LB/MMBTU (HHV)              |                    |
| SOx                                |                    |

\* CORRECTED TO 3 % O<sub>2</sub> ( DRY BASIS @ DESIGN HEAT RELEASE )

NOTES : [A] Burner Vendor shall provide a separate price for the completion of a witnessed burner test to be held at the burner vendor facility based on the attached fuel and operating conditions.

[B] Burner Vendor to supply pricing for spare parts.

[C] Burner Vendor to submit bi-weekly production schedules throughout the engineering and production of the burners.

[D] The following requirements shall apply

Submittal for customer review of weld procedures (WPS) and material test reports (MTR's)

Submittal for customer review of PMI of all materials

[E] Applicable Customer Specifications include;

REP 5-2-2 Flanges, Gaskets, and Bolting

REP 5-6-3 Piping for Fired Heaters

REP 8-2-1 Fired Heaters

REP 10-2-2 Supplemental Material Requirements for Metallic Materials

REP 10-2-3 Material Hardness Requiren

REP 15-1-4 Positive Materials Identical

# Section 8

## Map(s)

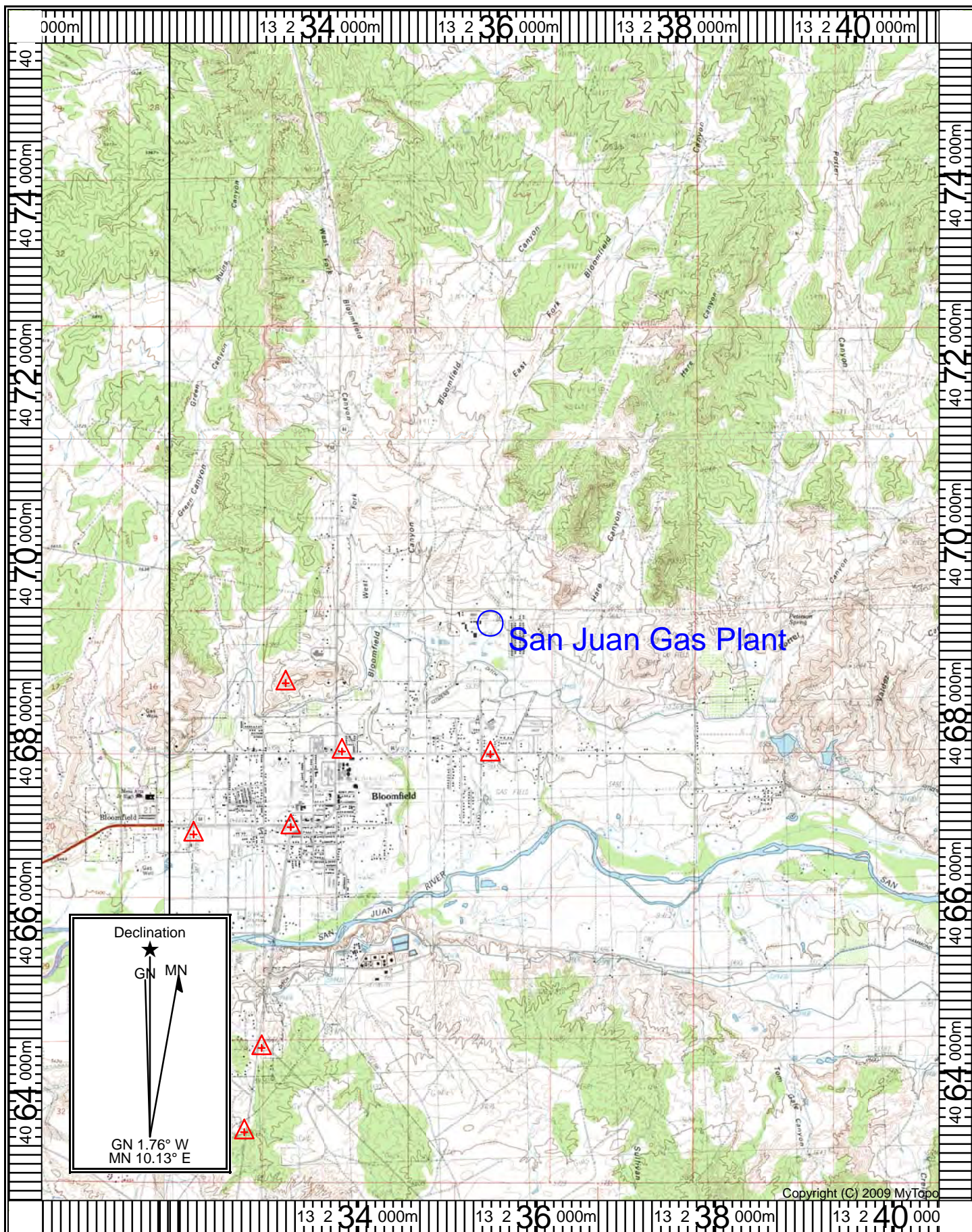
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**A map** such as a 7.5 minute topographic quadrangle showing the exact location of the source. The map shall also include the following:

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

---

A topographical map is attached to this application.



Map Name: BLOOMFIELD  
Print Date: 06/13/12

Scale: 1 inch = 4,761 ft.  
Map Center: 13 0235699 E 4069190 N

Horizontal Datum: WGS84

map brought forward from previous application

# Section 9

## Proof of Public Notice

(for NSR applications submitting under 20.2.72 or 20.2.74 NMAC)

(This proof is required by: 20.2.72.203.A.14 NMAC "Documentary Proof of applicant's public notice")

---

☒ This document provides detailed instructions about public notice requirements for various permitting actions. It also provides public notice examples and certification forms. Material mistakes in the public notice will require a re-notice before issuance of the permit.

---

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

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

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

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

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

All public notice requirements are completed and are attached to this application.

# NOTICE

**Hilcorp Energy Company** announces its application submittal to the New Mexico Environment Department for an air quality permit for the **modification** of its gas processing plan known as **San Juan Gas Plant**. The expected date of application submittal to the Air Quality Bureau is **December 15, 2023**.

The exact location for the facility known as **San Juan Gas Plant**, is at latitude **36.73251°** and longitude - **107.96701°**. The approximate location of this facility is **0.9 miles northeast of Bloomfield** in **San Juan** County.

The proposed **modification** consists of replacing two turbines.

The estimated maximum quantities of any regulated air contaminant will be as follows in pound per hour (pph) and tons per year (tpy) and could change slightly during the course of the Department's review:

| Pollutant:   | Pounds per hour | Tons per year |
|--|-----------------|---------------|
| Particulate Matter (PM)                              | 5               | 20            |
| PM <sub>10</sub>                                     | 5               | 19            |
| PM <sub>2.5</sub>                                    | 5               | 19            |
| Sulfur Dioxide (SO <sub>2</sub> )                    | 5               | 21            |
| Nitrogen Oxides (NO <sub>x</sub> )                   | 485             | 953           |
| Carbon Monoxide (CO)                                 | 97              | 230           |
| Volatile Organic Compounds (VOC)                     | 16              | 78            |
| Total sum of all Hazardous Air Pollutants (HAPs)     | 2               | 12            |
| Green House Gas Emissions as Total CO <sub>2</sub> e | n/a             | 301,000       |

The standard and maximum operating schedules of the facility will be 24 hours a day, **7** days a week and a maximum of **52** weeks per year

The owner of the Facility is: **Hilcorp Energy Company; 1111 Travis Street; Houston, TX 77002**

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

With your comments, please refer to the company name and facility name, or send a copy of this notice along with your comments. This information is necessary since the Department may have not yet received the permit application. Please include a legible return mailing address. Once the Department has completed its preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

## Atención

Este es un aviso de la oficina de Calidad del Aire del Departamento del Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usted desea información en español, por favor comuníquese con esa oficina al teléfono 505-372-8373.

**Notice of Non-Discrimination**

NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part 7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non-discrimination programs, policies or procedures, or if you believe that you have been discriminated against with respect to a NMED program or activity, you may contact: Kathryn Becker, Non-Discrimination Coordinator, NMED, 1190 St. Francis Dr., Suite N4050, P.O. Box 5469, Santa Fe, NM 87502, (505) 827-2855, [nd.coordinator@state.nm.us](mailto:nd.coordinator@state.nm.us). You may also visit our website at <https://www.env.nm.gov/non-employee-discrimination-complaint-page/> to learn how and where to file a complaint of discrimination.

7014 2870 0001 4719 0791

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**BLOOMFIELD, NM 87413**

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**MINISTRY**  
**2004 SAIZ LANE**  
**BLOOMFIELD, NM 87413**

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**MYRON G CASUAS**  
**2000 SAIZ LANE**  
**BLOOMFIELD, NM 87413**

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**CATHOLIC CHURCH BLOOMFIELD**  
**307 N CHURCH STREET**  
**BLOOMFIELD, NM 87413**

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**EL PASO NATURA**  
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**BLOOMFIELD, NM 87413**

PS Form 3800, July 2014

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**BLOOMFIELD CITY MANAGER**  
**915 N 1<sup>ST</sup> STREET**  
**BLOOMFIELD, NM 87413**

PS Form 3800, July 2014

See Reverse for Instructions

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**201 W. CHACO STREET**  
**AZTEC, NM 87410**

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**SAN JUAN COUNTY EXECUTIVE OFFICE**  
**100 S OLIVER DRIVE**  
**AZTEC, NM 87410**

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City, State, ZIP+

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**PRESIDENT BUU NYGREN**  
**P.O. BOX 7440**  
**WINDOW ROCK, AZ 86515**

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Street & Apt. No.  
or PO Box No.  
City, State, ZIP+

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**Table of Posted Notice Locations**

| <b>Name</b>                          | <b>Address</b>        | <b>City</b> | <b>State</b> | <b>Zip Code</b> |
|--------------------------------------|-----------------------|-------------|--------------|-----------------|
| San Juan Gas Plant Facility Entrance |                       |             |              |                 |
| United States Postal Service         | 1108 W Broadway Ave   | Bloomfield  | NM           | 87413           |
| Public Library                       | 333 S 1st St          | Bloomfield  | NM           | 87413           |
| Roadside Café                        | 319 S Bloomfield Blvd | Bloomfield  | NM           | 87413           |

- [Account Search](#)
- [View Created Report\(s\)](#)
- [Help?](#)
- [San Juan County Assessor](#)
- [San Juan County Office](#)
- [San Juan County Treasurer](#)
- [Logout Public](#)

## Account: R4007792

### Location

**Parcel Number** 2062171477463  
**Situs Address** 1001 ARIZONA AVE  
**Tax Area** 6INNR - District 6IN Non-Residential

**Legal Summary** BEG N89-48-16-E  
 255.27 FT FROM NW COR OF SEC 14  
 29 11 TH N89-48-16- E 1039.73 FT, S00-  
 02-06- E 228.30 FT, S51-28-15- W  
 290.01 FT, S89-47-37- W 91.92 FT, S14-  
 48-37- W 639.35 FT, N89-47-18- E  
 431.17 FT, S01-32-34- W 292.14 FT,  
 S89-45-57- W 685.45 FT, N12-27-57- E  
 67.10 FT, N21-43-03- W 74.30 FT, N45-  
 42-03- W 101.20 FT, N70-33-03- W  
 270.10 FT, S75-48-57- W 223.01 FT,  
 N00-17-49- E 818.18 FT, N89-57-28- E  
 252.25 FT, N00-57-56- E 258.25 FT TO  
 PT OF BEG. BK.1621 PG.803

**Serial Number**

### Owner Information

**Owner Name** HILCORP SAN JUAN  
 LP  
**Owner Address** 1111 TRAVIS ST  
 HOUSTON, TX 77002

### Assessment History

|                               |  |
|-------------------------------|--|
| <b>Actual Value (2023)</b>    | \$898,222                              |
| <b>Assessed</b>               | \$299,407                              |
| <b>Tax Area:</b> 6INNR        | <b>Mill Levy:</b> 34.133000            |
| <b>Type</b>                   | <b>Actual Assessed Acres SQFT</b>      |
| LAND AND/OR<br>IMPROVEMENT(S) | \$898,222 \$299,407 28.129 1253153.240 |

### Transfers

| Reception Number           | Book Page                      | Recording Date             | Sale Date                  | Grantee  | Grantor                                     | Doc Type            |
|----------------------------|--------------------------------|----------------------------|----------------------------|--|---|---------------------|
| <a href="#">201711503</a>  | <a href="#">B: 1621 P: 803</a> | <a href="#">09/26/2017</a> | <a href="#">07/24/2017</a> | <a href="#">HILCORP SAN JUAN LP</a>                            | <a href="#">CONOCOPHILLIPS CO</a>           | <a href="#">SWD</a> |
| <a href="#">2009-01536</a> | <a href="#">B: 1488 P: 436</a> | <a href="#">02/03/2009</a> | <a href="#">12/18/2008</a> | <a href="#">CONOCO PHILLIPS CO AND TOC ROCKY MOUNTAINS INC</a> | <a href="#">EL PASO NATURAL GAS COMPANY</a> | <a href="#">QC</a>  |

### Tax History

| Tax Year | Taxes       |
|----------|-------------|
| 2023     | \$10,219.64 |
| 2022     | \$9,406.56  |

### Images

- [Photo](#)
- [Sketch](#)



**December 20, 2023**

CERTIFIED MAIL 7014 2870 0001 4719 0791

RETURN RECEIPT REQUESTED (certified mail is required, return receipt is optional)

Dear **Neighbor**,

**Hilcorp Energy Company** announces its application submittal to the New Mexico Environment Department for an air quality permit for the **modification** of its gas processing plan known as **San Juan Gas Plant**. The expected date of application submittal to the Air Quality Bureau is **December 15, 2023**.

The exact location for the facility known as **San Juan Gas Plant**, is at latitude **36.73251°** and longitude **-107.96701°**. The approximate location of this facility is **0.9 miles northeast of Bloomfield** in **San Juan County**.

The proposed **modification** consists of replacing two turbines.

The estimated maximum quantities of any regulated air contaminant will be as follows in pound per hour (pph) and tons per year (tpy) and could change slightly during the course of the Department's review:

| Pollutant:   | Pounds per hour | Tons per year |
|--|-----------------|---------------|
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| PM <sub>10</sub>                                     | 5               | 19            |
| PM <sub>2.5</sub>                                    | 5               | 19            |
| Sulfur Dioxide (SO <sub>2</sub> )                    | 5               | 21            |
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| Carbon Monoxide (CO)                                 | 97              | 230           |
| Volatile Organic Compounds (VOC)                     | 16              | 78            |
| Total sum of all Hazardous Air Pollutants (HAPs)     | 2               | 12            |
| Green House Gas Emissions as Total CO <sub>2</sub> e | n/a             | 301,000       |

The standard and maximum operating schedules of the facility will be 24 hours a day, **7** days a week and a maximum of **52** weeks per year

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

Please refer to the company name and facility name, or send a copy of this notice along with your comments, since the Department may have not yet received the permit application. Please include a legible return mailing address with your comments. Once the Department has

performed a preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

**Atención**

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Sincerely,

**Hilcorp Energy Company**  
**1111 Travis Street**  
**Houton, TX 77002**

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**December 20, 2023**

CERTIFIED MAIL 7014 2870 0001 4719 0814

RETURN RECEIPT REQUESTED (certified mail is required, return receipt is optional)

Dear **County Manager**,

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| Green House Gas Emissions as Total CO <sub>2</sub> e | n/a             | 301,000       |

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Please refer to the company name and facility name, or send a copy of this notice along with your comments, since the Department may have not yet received the permit application. Please include a legible return mailing address with your comments. Once the Department has

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Sincerely,

**Hilcorp Energy Company**  
**1111 Travis Street**  
**Houton, TX 77002**

**Notice of Non-Discrimination**

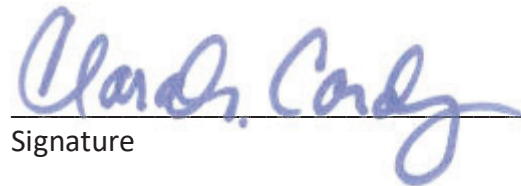
NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part 7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non-discrimination programs, policies or procedures, or if you believe that you have been discriminated against with respect to a NMED program or activity, you may contact: Non-Discrimination Coordinator, NMED, 1190 St. Francis Dr., Suite N4050, P.O. Box 5469, Santa Fe, NM 87502, (505) 827-2855, [nd.coordinator@env.nm.gov](mailto:nd.coordinator@env.nm.gov). You may also visit our website at <https://www.env.nm.gov/non-employee-discrimination-complaint-page/> to learn how and where to file a complaint of discrimination.

## General Posting of Notices – Certification

I, Clara Cardoza, the undersigned, certify that on **12/18/2023**, posted a true and correct copy of the attached Public Notice in the following publicly accessible and conspicuous places in the **CITY of BLOOMFIELD** of **SAN JUAN** County, State of New Mexico on the following dates:

1. Facility Entrance: 12/18/2023
2. USPS (Post Office): 12/18/2023
3. Public Library: 12/18/2023
4. Roadside Café: 12/18/2023

Signed this 18 day of December, 2023,

  
Signature

12/18/2023  
Date

Clara Cardoza  
Printed Name

Environmental Compliance, Hilcorp Energy  
Title {APPLICANT OR RELATIONSHIP TO APPLICANT}

DIRECTION  
82 deg(T)

36.73289°N  
107.96668°W

ACCURACY 4 m  
DATUM WGS84

## NOTICE

Hilcorp Energy Company announces its application submitted to the New Mexico Environment Department for an air quality permit for the modification of its gas processing plan known as San Juan Gas Plant. The expected date of application submission to the Air Quality Bureau is December 15, 2023.

The exact location for the facility known as San Juan Gas Plant is at latitude 36.73251° and longitude 107.96701°. The approximate location of this facility is 0.9 miles northeast of Bloomfield in San Juan County.

The proposed modification consists of replacing two turbines.

The estimated maximum quantities of any regulated air contaminant will be as follows in pound per hour (pph) and tons per year (tpy) and could change slightly during the course of the Department's review:

| Pollutant:  | Pounds per hour | Tons per year |
|---|-----------------|---------------|
| Particulate Matter (PM <sub>10</sub> )              | 5               | 20            |
| PM <sub>2.5</sub>                                   | 5               | 19            |
| Sulfur Dioxide (SO <sub>2</sub> )                   | 5               | 19            |
| Nitrogen Oxides (NO <sub>x</sub> )                  | 5               | 21            |
| Carbon Monoxide (CO)                                | 485             | 953           |
| Volatile Organic Compounds (VOC)                    | 97              | 230           |
| Total sum of all Hazardous Air Pollutants (HAPs)    | 16              | 78            |
| Greenhouse Gas Emissions as Total CO <sub>2</sub> e | N/A             | 301,000       |

The standard and maximum operating schedule of the facility will be 24 hours a day, 7 days a week and a maximum of 52 weeks per year.

The owner of the facility is: Hilcorp Energy Company, 1111 Travis Street, Houston, TX 77002

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager, New Mexico Environment Department, Air Quality Bureau, 525 Camino del Rio, Marquette, Suite 3, Santa Fe, New Mexico, 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1-800-224-7009.

With your comments, please refer to the company name and facility name, or send a copy of this notice along with your comments. The information is necessary since the Department may have not yet received the permit application. Please include a legible return mailing address. Once the Department has completed its preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

### Atención:

Si usted es un proveedor de la oficina de Calidad del Aire del Departamento del Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área, si usted desea informarnos en español, por favor comuníquese con nosotros al teléfono 505-372-8373.



Hilcorp Energy Company

***San Juan Gas Plant***

**ADDRESS:**

**1001 ARIZONA**

2023-12-18  
10:15:32-07:00

MANAGEMENT  
Office  
Suite A  
Mexico 87402

bray@bsin.k12.nm.us

vplatero@bsin.k12.nm.us

mvelasquez@bsin.k12.nm.us

DIRECTION  
178 deg(T)

36.71186°N  
107.99189°W

ACCURACY 35 m  
DATUM WGS84

July 1, 2023

### Impound for the Management

(BLM) is preparing to monitor and  
livestock are found within the area  
are excessive amounts of trespass  
ids. Unauthorized livestock are  
on range resources for their permitted  
otify the public before impoundment

priority of the Code of Federal Regulations  
n part, that "unauthorized livestock  
within the 12-month period following  
of impound will be given to owners of  
described areas. If the owner is  
Title 43 Subsection 4150.4-1b at which  
lays from the publishing and posting of

impound unauthorized livestock on BLM  
elivery of this notice, and for the  
are subject to impoundment, removal  
lateral regulations and State laws.  
orarily for brand identification and

y these legal subdivisions within the  
map)

COLORADO BASIN  
UTAH, WYOMING

## PUBLIC NOTICE

### BLOOMFIELD IRRIGATION DISTRICT

#### Special Board Meeting

#### Canvass of the Vote

To be held on **Monday, December 10, 2023 at 6:30 PM.**  
Items on the agenda include: Election Recap, Canvass of the  
Vote, Oath of Office, and CPO Designation Letter. If there  
are any questions, please contact Stacy at the Bloomfield  
Irrigation District Office 632-2800 or 1205 E. Broadway in  
Bloomfield.

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Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los  
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USPS

Bloomfield NM

2023-12-18  
10:59:58-07:00

DIRECTION  
351 deg(T)

We know your  
first baby is your  
first priority.

FREE SUPPORT  
via phone or video conferencing

36.70872°N  
107.97952°W



Childhaven Will Assist  
with Your Child's Health  
Needs.

Childhaven assists with medical, vision,  
dental, and mental health needs.

[www.childhavennm.org/shelter/](http://www.childhavennm.org/shelter/)

For any additional info about private placements,  
please contact the Childhaven Shelter directly.

ACCURACY 68 m  
DATUM WGS84

We're here to Help...

As a parent or guardian, you can  
call and visit DAILY and you are the  
decision maker for your children.

Childhaven Shelter

(505) 325- 5358 EXT. 1

807 W Apache St.

Farmington, NM 87401



Open 24/7, 365 Days a Year

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DO  
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CHIL

The TRI  
Bloom

- Academic t
- College and
- Financial aid
- SAT/ACT pr

Contact TRIO U

(505) 566-4237  
triohub@sanjuancc

\*\*Only available fo

DIRECTION  
296 deg(T)

36.70887°N  
107.98554°W

ACCURACY 12 m  
DATUM WGS84

# NOTICE

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Naaba Ani Elementary:  
Melodee Velasquez  
505-634-3539 Office  
mvelasquez@bsin.k12.nm.

Roadside Cafe

Bloomfield NM

2023-12-18  
10:52:41-07:00

**Table of Notices Neighbors**

| <b>Name</b>                              | <b>Address</b>  | <b>City</b> | <b>State</b> | <b>Zip Code</b> |
|--|-----------------|-------------|--------------|-----------------|
| EL Paso Natural Gas Co                   | 81 Road 4900    | Bloomfield  | NM           | 87413           |
| Catholic Church Bloomfield               | 307 N Church St | Bloomfield  | NM           | 87413           |
| Casuas Myron G                           | 2000 Saiz Ln    | Bloomfield  | NM           | 87413           |
| Native Vision For Christ Navajo Ministr* | 2004 Saiz Ln    | Bloomfield  | NM           | 87413           |
| Corey Ronald G and Mildred Jean          | PO Box 747      | Bloomfield  | NM           | 87413           |

**Table of Noticed Municipalities**

| <b>Name</b>               | <b>Address</b>   | <b>City</b> | <b>State</b> | <b>Zip Code</b> |
|---------------------------|------------------|-------------|--------------|-----------------|
| Bloomfield - City Manager | 915 N 1st Street | Bloomfield  | NM           | 87413           |
| Aztec - City Hall         | 201 W. Chaco St. | Aztec       | NM           | 87410           |

**Table of Noticed Counties**

| <b>Name</b>                        | <b>Address</b>    | <b>City</b> | <b>State</b> | <b>Zip Code</b> |
|------------------------------------|-------------------|-------------|--------------|-----------------|
| San Juan County - Executive Office | 100 S. Oliver Dr. | Aztec       | NM           | 87410           |

**Table of Noticed Tribes**

| <b>Name</b>          | <b>Address</b> | <b>City</b> | <b>State</b> | <b>Zip Code</b> |
|----------------------|----------------|-------------|--------------|-----------------|
| President Buu Nygren | P.O. Box 7440  | Window Rock | AZ           | 86515           |

## Submittal of Public Service Announcement – Certification

I, Daniel Dolce, the undersigned, certify that on **December 22, 2023**, submitted a public service announcement to **iHeartMEDIA** that serves the City\Town\Village of **Farmington, San Juan** County, New Mexico, in which the source is or is proposed to be located and that **iHeartMEDIA DID NOT RESPOND**.

Signed this 22 day of December, 2023,

*Daniel Dolce*  
Signature

12/22/23  
Date

Daniel Dolce  
Printed Name

Associate Consultant - Trinity Consultants  
Title {APPLICANT OR RELATIONSHIP TO APPLICANT}

PSA REQUEST

Please provide the information below to submit your Public Service Announcement.

Get Started With iHeartMedia Farmington <br/> <div class='cta'> To purchase or learn about advertising with iHeartMedia, call us at <a href='tel:1-844-234-3575'> 1-844-AD-HELP-5 (1-844-234-3575) </a> </div>

Form Wrapper

Trinity Consultants

Daniel

Dolce

Associate Consultant

(505) 818-8761

daniel.dolce@trinityconsultants.com

Per New Mexico Administrative Code 20.2.72.203.B NMAC and according to the Guidance for Public Notice for Air Quality Permit Applications – (5) Notifications: Submittal of Public Service Announcement (PSA): A public service announcement required for permits and significant permit revisions must be submitted to at least one radio or television station, which services the municipality, or county which the facility is or will be located. Therefore, based on the above, we respectfully ask you to air the information shown below as a Public Service Announcement.

The public service announcement request must contain the following information about the facility or proposed facility (20.2.72.203.D NMAC).

a. The name: San Juan Gas Plant, location: 36.73251° N, -107.96701°W and type of business: Gas Plant.

b. The name and principal owner or operator: Hilcorp Energy Company – owner and operator.

c. The type of process or change for which the permit is sought: Replacing two turbines

d. Locations where the notices have been posted in Loving, NM 88256: (1) San Juan Gas Plant Facility Entrance (2) United States Postal Service, 1108 W Broadway Ave, Bloomfield, NM 87413 (3) Public Library, 333 S 1st St, Bloomfield, NM 87413 (4) Roadside Cafe, 319 S Bloomfield Blvd, Bloomfield, NM 87413.

e. The Department's address or telephone number to which comments may be directed: Permit Programs manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1, Santa Fe, New Mexico; 87505-1816; (505) 476-4300; 1 (800) 224-7009.

☒ I acknowledge that this is a business request

I'm not a robot

reCAPTCHA  
Privacy - Terms

SEND

|                                      |                          |
|--------------------------------------|--------------------------|
| Radio (/radio)                       | Results (/results)       |
| Digital (/digital)                   | Events (/results)        |
| Podcasting (/podcasting)             | Roi (/roi)               |
| Endorsements (/endorsements)         | Contact (/contact)       |
| Sponsorships (/sponsorships)         | Featured (/featured)     |
| Traffic & Weather (/traffic-weather) | Experts (/ask-an-expert) |
| Creative (/creative)                 |                          |

iHeartMedia Farmington

Phone: (tel:+)

200 E. Broadway Ave Farmington NM 87401

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Radio/Digital/Outdoor/Mobile/Social/Events

# Farmington Daily Times

PART OF THE USA TODAY NETWORK

## Affidavit of Publication

Ad # 0005866454

This is not an invoice

TRINITY CONSULTANTS  
9400 HOLLY AVE NE

ALBUQUERQUE, NM 87122-2968

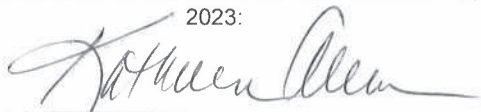
I, being duly sworn say: **Farmington Daily Times**, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the State of New Mexico for publication and appeared in the internet at The Daily Times web site on the following days(s):

12/15/2023



Legal Clerk

Subscribed and sworn before me this December 15, 2023:



State of WI, County of Brown  
NOTARY PUBLIC

1-7-25  
My commission expires

KATHLEEN ALLEN  
Notary Public  
State of Wisconsin

Ad # 0005866454

PO #:

# of Affidavits 1

This is not an invoice

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## Notice of Non-Discrimination

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#5866454, Daily Times, December 15, 2023

Text of Ad: 12/12/2023

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The owner of the Facility is: Hilcorp Energy Company; 1111 Travis Street; Houston, TX 77002

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address:

Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

With your comments, please refer to the company name and facility name, or send a copy of this notice along with your comments. This information is necessary since the Department may have not yet received the permit application. Please include a legible return mailing address. Once the Department has completed its preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

#### Atención

Este es un aviso de la oficina de Calidad del Aire del Departamento del Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usted desea información en español, por favor comuníquese con esa oficina al teléfono 505-372-8373.

#### Notice of Non-Discrimination

NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part 7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non-discrimination programs, policies or procedures, or if you believe that you have been discriminated against with respect to a NMED program or activity, you may contact: Kathryn Becker, Non-Discrimination Coordinator, NMED, 1190 St. Francis Dr., Suite N4050, P.O. Box 5469, Santa Fe, NM 87502, (505) 827-2855, nd.coordinator@state.nm.us. You may also visit our website at <https://www.env.nm.gov/non-employee-discrimination-complaint-page/> to learn how and where to file a complaint of discrimination.

#5866454, Daily Times, December 15, 2023

# THE DAILY TIMES

## AFFIDAVIT OF PUBLICATION

Ad No.

GCI1126214

TRINITY CONSULTANTS  
9400 HOLLY AVE NE BLDG 38  
ALBUQUERQUE, NM 87122

I, being duly sworn say: **THE DAILY TIMES**, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said **DAILY TIMES**, a daily newspaper duly qualified for the purpose within the State of New Mexico for publication and appeared in the internet at The Daily Times web site on the following day(s):

12/15/2023



Legal Clerk

Subscribed and sworn before me this  
15TH of December, 2023



State of WI, County of Brown  
NOTARY PUBLIC

5.15.27

My Commission Expires

Ad#: GCI1126214  
Ad Cost: \$176.12  
PO: PUBLIC NOTICE  
# of Affidavits: 1

NANCY HEYRMAN  
Notary Public  
State of Wisconsin

### NOTICE

**Hilcorp Energy Company** announces its application submittal to the New Mexico Environment Department for an air quality permit for the **modification** of its gas processing plan known as **San Juan Gas Plant**. The expected date of application submittal to the Air Quality Bureau is **December 15, 2023**.

The exact location for the facility known as **San Juan Gas Plant**, is at latitude **36.73251°** and longitude **-107.96701°**. The approximate location of this facility is **0.9 miles northeast of Bloomfield in San Juan County**.

The proposed **modification** consists of replacing two turbines.

The estimated maximum quantities of any regulated air contaminant will be as follows in pound per hour (pph) and tons per year (tpy) and could change slightly during the course of the Department's review:

| Pollutant:   | Pounds per hour | Tons per year |
|--|-----------------|---------------|
| Particulate Matter (PM)                              | 5               | 20            |
| PM 10  | 5               | 19            |
| PM 2.5   | 5               | 19            |
| Sulfur Dioxide (SO <sub>2</sub> )                    | 5               | 21            |
| Nitrogen Oxides (NO <sub>x</sub> )                   | 485             | 953           |
| Carbon Monoxide (CO)                                 | 97              | 230           |
| Volatile Organic Compounds (VOC)                     | 16              | 78            |
| Total sum of all Hazardous Air Pollutants (HAPs)     | 2               | 12            |
| Green House Gas Emissions as Total CO <sub>2</sub> e | n/a             | 301,000       |

The standard and maximum operating schedules of the facility will be 24 hours a day, 7 days a week and a maximum of **52 weeks** per year

The owner of the Facility is: **Hilcorp Energy Company; 1111 Travis Street; Houston, TX 77002**

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

With your comments, please refer to the company name and facility name, or send a copy of this notice along with your comments. This information is necessary since the Department may have not yet received the permit application. Please include a legible return mailing address. Once the Department has completed its preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

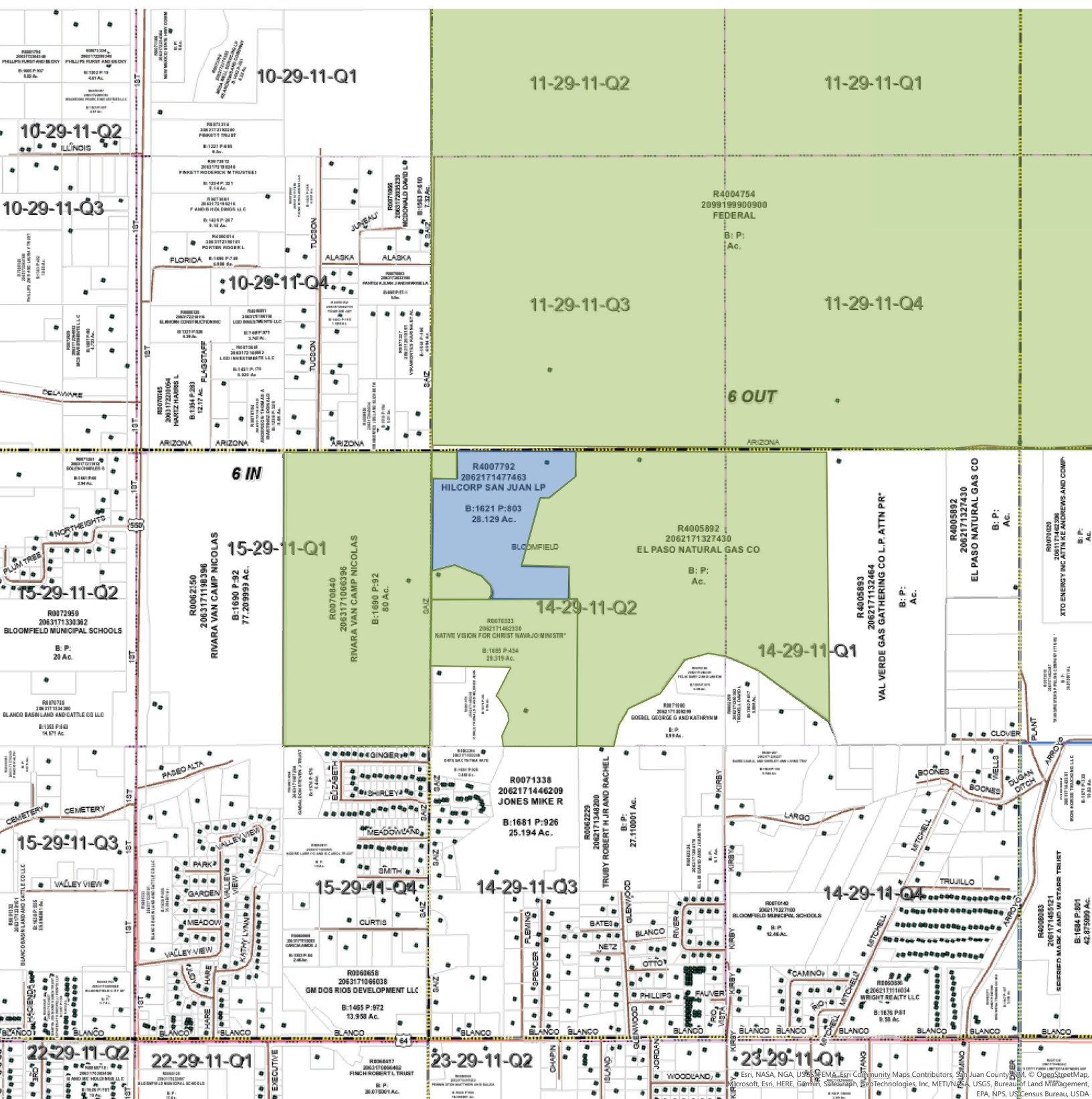
#### Atención

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TX-GCI1126214-01



# Section 10

## Written Description of the Routine Operations of the Facility

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

In operation, a 15,000 horsepower (hp) inlet compression turbine (Unit 1) boosts the low-pressure inlet gas stream pressure. This compressed gas combines with the high-pressure inlet gas stream and is routed to an inlet separator for removal of free liquids. Gas from the inlet separator is split into two streams (for processing in two parallel trains) and is dehydrated by molecular sieve dehydration beds (two beds per train) to remove water prior to cryogenic processing. In each train, one dehydration bed is in service while the other is being regenerated. For regeneration, a slipstream of gas is taken from the inlet separator, compressed by a regeneration compressor, and then heated by regeneration heaters (Units 8 and 13). The heated gas passes through the wet dehydration bed to remove the water. The gas stream is then re-injected into the inlet stream.

The dehydrated gas is then refrigerated in the cryogenic plants to approximately -100 °F by a series of heat exchangers using a propane refrigeration system. Free liquids are then removed in the high-pressure cold separator. Condensed liquids are fed to the demethanizer; pressurized vapors are fed to the turboexpander where a near isentropic expansion reduces pressure and temperature and delivers shaft work to the recompressor for partial recompression of residue gas, recovering some of the energy expended in compressing the gas.

In the demethanizer in each train, ethane, propane, butane, and condensate (EPBC) are liquefied. EPBC is transferred to either the deethanizer or to a pipeline for delivery to customers for further processing and fractionation. The cold methane residue stream off the demethanizer is warmed through a series of heat exchangers (which cool gas streams for processing) prior to recompression by one of two 15,000 hp residue compressors (Units 2 & 3) and delivery to customers by pipeline. Note that the inlet and residue compressors, Units 1, 2, & 3, have Engelhard oxidation catalytic converters which reduce CO emissions. In the deethanizer process, the ethane/propane (EP) stream recovered from the deethanizer tower may be condensed and combined with the EPBC product stream from the cryogenic plants or compressed and injected into the residue gas stream. The deethanizer bottoms, a propane-butane-condensate (PBC) blend, are routed via pipeline to customers or sent to temporary pressurized storage.

Before shipping, the EPBC is routed to an amine contactor for CO<sub>2</sub> removal. Vent gas from amine system regeneration (CO<sub>2</sub> and H<sub>2</sub>S) is routed to a sulfur removal system (Thermal Oxidizer, Unit 15) or to the flare system. CO<sub>2</sub> and the remaining H<sub>2</sub>S (approximately <10 ppm or less) removed from the EPBC via the amine contactor are released to the atmosphere after being controlled by either the thermal oxidizer or the backup flare system. After CO<sub>2</sub> removal, the EPBC is routed through a desiccant system to remove any remaining entrained water. A natural gas fired heater (Unit 12) is used to regenerate the desiccant.

All liquid hydrocarbon product storage is pressurized. Several atmospheric tanks containing liquids with a vapor pressure less than ten millimeters of mercury (mmHg) are insignificant, as are the few atmospheric storage tanks which emit less than one ton per year (tpy).

Electricity used at the San Juan Gas Plant is generated by four natural gas-fired (using only pipeline quality sweet natural gas), turbines (Units 4, 5, 6, and 7). There are no proposed changes to this with the replacement of Units 6 and 7.

In the event of an emergency or for maintenance, some or all of the facility piping may be blown down for safety reasons. In addition, the shutdown of turbines involves the purging of gas contained within the equipment. With the exception of the six PSVs, all blowdown and emergency shutdown emissions are routed to a staged flare system, consisting of two flares (Units 9 and 16). Non-routine emissions from the Demethanizers are vented to the atmosphere.

# Section 11

## Source Determination

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

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

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

**A. Identify the emission sources evaluated in this section (list and describe): Please refer to Table 2-A.**

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

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

☐ Yes ☒ No

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

☒ Yes ☐ No

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

☒ Yes ☐ No

**C. Make a determination:**

- ☐ The source, as described in this application, constitutes the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes. If in "A" above you evaluated only the source that is the subject of this application, all "YES" boxes should be checked. If in "A" above you evaluated other sources as well, you must check **AT LEAST ONE** of the boxes "NO" to conclude that the source, as described in the application, is the entire source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes.
- ☒ The source, as described in this application, **does not** constitute the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes (A permit may be issued for a portion of a source). The entire source consists of the following facilities or emissions sources (list and describe):

San Juan Gas Plant, Blanco A Compressor Station, and Blanco C&D Compressor Station are located on contiguous and/or adjacent properties. San Juan Gas Plant is owned and operated by Hilcorp Energy Company and belongs to the Standard Industrial Classification (SIC) Major Group 13 (Oil & Gas Extraction)). Blanco A Compressor Station is owned and operated by El Paso Natural Gas Company and belongs to SIC Major Group 49. The Blanco C&D Compressor Station is owned by Enterprise Field Services, LLC and operated by Enterprise Products Operating, LLC and belongs to SIC Major Group 13 (Oil & Gas Extraction).

The plants are separate facilities for Title V permitting purposes. Common control of the three plants was established in 1984 through the issuance of a common NSR permit

# Section 12

## Section 12.A

### PSD Applicability Determination for All Sources

(Submitting under 20.2.72, 20.2.74 NMAC)

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

A. This facility is:

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

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

- a. NOx: **32.76** TPY
- b. CO: **39.97** TPY
- c. VOC: **11.47** TPY
- d. SO<sub>x</sub>: **0.70** TPY
- e. PM: **2.16** TPY
- f. PM<sub>10</sub>: **2.16** TPY
- g. PM<sub>2.5</sub>: **2.16** TPY
- h. Lead: **0.0046** TPY
- i. GHG: **38,364.14** TPY

C. **Netting is not required (project is not significant).**

D. **BACT is not required for this modification, as this application is a minor modification.**

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

This project does not result in debottlenecking. The replacement units will serve the same purpose and function as currently permitted Units 4-5 and will not debottleneck any other processes. There are not any permit modifications within the last two years related to this process.

Hilcorp Energy Co. - San Juan Gas Plant

Permit Comparison

| Unit No.   | Emissions Scenario      | NO <sub>x</sub> |         | CO       |        | VOC      |        | SO <sub>2</sub> |        | PM       |        | PM <sub>10</sub> |        | PM <sub>2.5</sub> |        | H <sub>2</sub> S |          | Lead      |          |
|--|-------------------------|-----------------|---------|----------|--------|----------|--------|-----------------|--------|----------|--------|------------------|--------|-------------------|--------|------------------|----------|-----------|----------|
|  |                         | lb/hr           | ton/yr  | lb/hr    | ton/yr | lb/hr    | ton/yr | lb/hr           | ton/yr | lb/hr    | ton/yr | lb/hr            | ton/yr | lb/hr             | ton/yr | lb/hr            | ton/yr   | lb/hr     | ton/yr   |
| 4  | Permitted               | 15.9            | 69.8    | 2.3      | 10     | 0.05     | 0.24   | 0.01            | 0.05   | 0.22     | 0.95   | 0.22             | 0.95   | 0.22              | 0.95   | --               | --       | 0.0000228 | 0.0001   |
|  | Proposed                | 3.74            | 16.38   | 4.56     | 19.99  | 1.31     | 5.73   | 0.078           | 0.34   | 0.25     | 1.08   | 0.25             | 1.08   | 0.25              | 1.08   | --               | --       | 5.24E-04  | 2.29E-03 |
|  | Net Change in Emissions | -12.16          | -53.42  | 2.26     | 9.99   | 1.26     | 5.49   | 0.07            | 0.29   | 0.027    | 0.13   | 0.027            | 0.13   | 0.027             | 0.13   | --               | --       | 0.00050   | 0.0022   |
| 5  | Permitted               | 15.9            | 69.8    | 2.3      | 10     | 0.05     | 0.24   | 0.01            | 0.05   | 0.22     | 0.95   | 0.22             | 0.95   | 0.22              | 0.95   | --               | --       | 0.0000228 | 0.0001   |
|  | Proposed                | 3.74            | 16.38   | 4.56     | 19.99  | 1.31     | 5.73   | 0.08            | 0.34   | 0.25     | 1.08   | 0.25             | 1.08   | 0.25              | 1.08   | --               | --       | 5.24E-04  | 2.29E-03 |
|  | Net Change in Emissions | -12.16          | -53.42  | 2.26     | 9.99   | 1.26     | 5.49   | 0.07            | 0.29   | 0.027    | 0.13   | 0.027            | 0.13   | 0.027             | 0.13   | --               | --       | 0.00050   | 0.0022   |
| Total Changes in Emissions   |                         | -24.32          | -106.84 | 4.53     | 19.97  | 2.52     | 10.99  | 0.14            | 0.58   | 0.054    | 0.26   | 0.054            | 0.26   | 0.054             | 0.26   | 0.00E+00         | 0.00E+00 | 0.0010    | 0.0044   |
| Conservative Assumption for Baseline Actual Emissions <sup>1</sup> |                         | 0.00E+00        |         | 0.00E+00 |        | 0.00E+00 |        | 0.00E+00        |        | 0.00E+00 |        | 0.00E+00         |        | 0.00E+00          |        | 0.00E+00         |          | 0.00E+00  |          |
| Project Potential Emissions (Sum of Units 4 and 5)                 |                         | 32.76           |         | 39.97    |        | 11.47    |        | 0.68            |        | 2.16     |        | 2.16             |        | 2.16              |        | 0.00E+00         |          | 0.0046    |          |
| Project Emission Increases   |                         | 32.76           |         | 39.97    |        | 11.47    |        | 0.68            |        | 2.16     |        | 2.16             |        | 2.16              |        | 0.00E+00         |          | 0.0046    |          |
| Significant Emission Rate (ton/yr) <sup>1</sup>                    |                         | 40.00           |         | 100.00   |        | 40.00    |        | 40.00           |        | 25.00    |        | 15.00            |        | 10.00             |        | 10.00            |          | 0.60      |          |
| Is Project Significant?  |                         | NO              |         | NO       |        | NO       |        | NO              |        | NO       |        | NO               |        | NO                |        | NO               |          | NO        |          |

<sup>1</sup> As a conservative first estimate, it was assumed that the baseline actual emissions for Units 4 and 5 is 0 tpy. Since these units are replacement units, this is in lieu of reviewing 10 years of data to determine the highest baseline actual emissions based on the highest 24-month consecutive p

<sup>2</sup> Significant Emission Rates (SER) per Table 2 - 20.2.74.502 NMAC.

# Section 13

## Determination of State & Federal Air Quality Regulations

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

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

### **Required Information for Specific Equipment:**

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

### **Required Information for Regulations that Apply to the Entire Facility:**

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

### **Regulatory Citations for Regulations That Do Not, but Could Apply:**

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

### **Regulatory Citations for Emission Standards:**

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

### **Federally Enforceable Conditions:**

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

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

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

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**Table for State Regulations:**

| <a href="#">State Regulation Citation</a> | Title  | Applies?<br>Enter Yes or No | Unit(s)<br>or Facility | Justification:<br>(You may delete instructions or statements that do not apply in the justification column to shorten the document.)   |
|---|--|-----------------------------|------------------------|--|
| 20.2.1 NMAC                               | General Provisions                                       | Yes                         | Facility               | General Provisions apply to Notice of Intent, Construction, and Title V permit applications.   |
| 20.2.3 NMAC                               | Ambient Air Quality Standards NMAAQS                     | Yes                         | Facility               | 20.2.3 NMAC is a State Implementation Plan (SIP) approved regulation that limits the maximum allowable concentration of Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide. This facility is an affected facility.   |
| 20.2.7 NMAC                               | Excess Emissions   | Yes                         | Facility               | The entire facility is subject to emissions limits from both federal and state regulations. Thus, the facility is subject to this regulation.  |
| 20.2.23 NMAC                              | Fugitive Dust Control                                    | No                          | N/A                    | This regulation does not apply as the facility has no need for fugitive dust control measures. This facility does not fall under applicability facility listed mentioned in this regulation.   |
| 20.2.33 NMAC                              | Gas Burning Equipment - Nitrogen Dioxide                 | No                          | N/A                    | This regulation applies to facilities that have gas-burning external combustion sources with more than 1,000,000 MMBtu/hr capacity. None of the external combustion equipment of this facility has a capacity greater than 1,000,000 MMBtu/hr. Therefore, this regulation does not apply to this facility.   |
| 20.2.34 NMAC                              | Oil Burning Equipment: NO <sub>2</sub>                   | No                          | N/A                    | This regulation applies to facilities that have oil-burning external combustion sources with more than 1,000,000 MMBtu/hr capacity. This facility does not have any oil-burning external combustion equipment.   |
| 20.2.35 NMAC                              | Natural Gas Processing Plant – Sulfur                    | Yes                         | Facility               | This regulation establishes sulfur emission standards for natural gas processing plants. The facility will comply with all applicable requirements under this subpart.   |
| 20.2.37 and 20.2.36 NMAC                  | Petroleum Processing Facilities and Petroleum Refineries | N/A                         | N/A                    | <b>These regulations were repealed by the Environmental Improvement Board. If equipment was subject to 20.2.37 NMAC before the repeal, the combustion emission sources are now subject to 20.2.61 NMAC.</b>  |
| 20.2.38 NMAC                              | Hydrocarbon Storage Facility                             | No                          | N/A                    | This regulation could apply to storage tanks at petroleum production facilities, processing facilities, tanks batteries, or hydrocarbon storage facilities.<br>The facility does not meet the definition as outlined in 20.2.38 NMAC and is therefore not subject to this regulation.  |
| 20.2.39 NMAC                              | Sulfur Recovery Plant - Sulfur                           | No                          | N/A                    | This regulation could apply to sulfur recovery plants that are not part of petroleum or natural gas processing facilities.<br>This facility does not have a sulfur recovery unit as defined in this regulation and is therefore not subject to this regulation.  |
| 20.2.50 NMAC                              | Oil and Gas Sector – Ozone Precursor Pollutants          | No                          | 1-7, 14                | <p>This regulation establishes emission standards for volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) for oil and gas production, processing, compression, and transmission sources. 20.2.50 NMAC subparts below:</p> <p>Include the construction status of applicable units as “New”, “Existing”, “Relocation of Existing”, or “Reconstructed” as defined by this Part in your justification:</p> <p>Check the box for the subparts that are applicable:</p> <p><input checked="" type="checkbox"/> 113 – Engines and Turbines: This facility has natural gas-fired turbines (Unit 1-7). The facility will comply with this regulation. <b>(Units 1-3, 6 &amp; 7) [Existing] (Units 4 &amp; 5) [Replacement units]</b></p> <p><input type="checkbox"/> 114 – Compressor Seals: Engines and Turbines: This facility does not have reciprocating compressors subject to this regulation.</p> <p><input type="checkbox"/> 115 – Control Devices and Closed Vent Systems: The control devices and closed vent systems at this facility are not used to comply with the requirements of this rule; therefore, the facility is not subject to the requirements of this rule.</p> |

| State<br>Regulation<br>Citation | Title                                  | Applies?<br>Enter Yes<br>or No | Unit(s)<br>or<br>Facility | Justification:<br>(You may delete instructions or statements that do not apply in the justification column to shorten the document.)   |
|---------------------------------|--|--------------------------------|---------------------------|--|
|                                 |  |                                |                           | <p><input checked="" type="checkbox"/> 116 – Equipment Leaks and Fugitive Emissions: This facility has equipment leaks and fugitive emissions. Thus, the facility will comply with this regulation. <b>(Unit 14) [Existing]</b></p> <p><input type="checkbox"/> 117 – Natural Gas Well Liquid Unloading: This facility is a natural gas processing plant and liquid unloading operations do not result in the venting of natural gas. Thus, the facility is not subject to this rule.</p> <p><input type="checkbox"/> 118 – Glycol Dehydrators: This facility does not have any dehydrators. Thus, this facility is not subject to this regulation.</p> <p><input type="checkbox"/> 119 – Heaters: This facility does not have a heater that has a capacity greater than 20 MMBtu/hr. Thus, this facility is not subject to this subpart.</p> <p><input type="checkbox"/> 120 – Hydrocarbon Liquid Transfers: This facility does not truck out any product. Thus, this regulation does not apply to this facility.</p> <p><input type="checkbox"/> 121 – Pig Launching and Receiving: This facility does not have pig launching and receiving VOC emission. Therefore, this facility is not subject to this subpart.</p> <p><input type="checkbox"/> 122 – Pneumatic Controllers and Pumps: This facility does not have any gas driven emissions and all pneumatic controllers are compressed air-driven. Thus, this regulation does not apply to this facility.</p> <p><input type="checkbox"/> 123 – Storage Vessels: This facility does not have any applicable storage vessels. Thus, the facility is not subject to this subpart.</p> <p><input type="checkbox"/> 124 – Well Workovers: No applicable activities for this facility. Thus, the facility is not subject to this regulation.</p> <p><input type="checkbox"/> 125 – Small Business Facilities: This facility is not defined as a small business facility. Thus, this regulation does not apply to this facility.</p> <p><input type="checkbox"/> 126 – Produced Water Management Unit: No applicable activities for this facility. Thus, the facility is not subject to this regulation.</p> <p><input type="checkbox"/> 127 – Flowback Vessels and Preproduction Operations: No applicable activities for this facility. Thus, the facility is not subject to this regulation.</p> |
| 20.2.61.109<br>NMAC             | Smoke & Visible Emissions              | Yes                            | 1-13,<br>15, 16           | This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, turbines, heaters, and flares unless the equipment is subject to another state regulation that limits particulate matter such as 20.2.19 NMAC (see 20.2.61.109 NMAC). The facility will comply with this regulation.  |
| 20.2.70<br>NMAC                 | Operating Permits                      | Yes                            | Facility                  | This regulation establishes requirements for obtaining a major source operating permit. The facility is a Title V major source and is subject to this regulation.  |
| 20.2.71<br>NMAC                 | Operating Permit Fees                  | Yes                            | Facility                  | This facility is subject to 20.2.70 NMAC and will therefore comply with the fee requirements of this regulation.   |
| 20.2.72<br>NMAC                 | Construction Permits                   | Yes                            | Facility                  | This regulation establishes the requirement for obtaining a construction permit. This facility is currently permitted under NSR #0613-M13 and complies with all the requirements of this regulation.   |
| 20.2.73<br>NMAC                 | NOI & Emissions Inventory Requirements | Yes                            | Facility                  | This regulation establishes emission inventory requirements. The facility meets the applicability requirements of 20.2.73.300 NMAC. The facility will meet all applicable reporting requirements under 20.2.73.300.B.1 NMAC.   |

| <a href="#">State Regulation Citation</a> | Title   | Applies?<br>Enter Yes or No | Unit(s) or Facility        | Justification:<br>(You may delete instructions or statements that do not apply in the justification column to shorten the document.)   |
|---|---|-----------------------------|----------------------------|--|
| 20.2.74 NMAC                              | Permits – Prevention of Significant Deterioration (PSD) | Yes                         | Facility                   | This regulation establishes requirements for obtaining a prevention of significant deterioration permit. This facility is a major source with respect to PSD and is therefore subject to 20.2.74 NMAC.   |
| 20.2.75 NMAC                              | Construction Permit Fees                                | No                          | Facility                   | This regulation establishes a schedule of operating permit emission fees. This facility is subject to 20.2.72 NMAC and in turn subject to 20.2.75 NMAC. The facility is exempt from annual fees under this part (20.2.75.11.E NMAC) as it is subject to fees pursuant to 20.2.71 NMAC.   |
| 20.2.77 NMAC                              | New Source Performance                                  | Yes                         | 1-9, 13, 14, & 16          | The following equipment of this facility are subject under the subparts of 40 CFR Part 60: <ul style="list-style-type: none"> <li>40 CFR 60, Subpart GG: Stationary gas turbines (Unit 1-3, 6 &amp; 7)</li> <li>40 CFR 60, Subpart Dc: Regeneration heaters (Unit 8 &amp; 13)</li> <li>40 CFR 60, Subpart KKK: Fugitive emissions (Unit 14) and flares (Unit 9 &amp; 16)</li> <li>40 CFR 60, Subpart KKKK: Stationary combustion turbines (Units 4-5)</li> </ul> |
| 20.2.78 NMAC                              | Emission Standards for HAPS                             | No                          | Units Subject to 40 CFR 61 | This regulation establishes state authority to implement emission standards for hazardous air pollutants subject to 40 CFR Part 61. This facility does not emit hazardous air pollutants which are subject to the requirements of 40 CFR Part 61 and is therefore not subject to this regulation.  |
| 20.2.79 NMAC                              | Permits – Nonattainment Areas                           | No                          | N/A                        | This regulation establishes the requirements for obtaining a nonattainment area permit. The facility is not located in a non-attainment area and therefore is not subject to this regulation.  |
| 20.2.80 NMAC                              | Stack Heights   | Yes                         | N/A                        | This regulation establishes requirements for the evaluation of stack heights and other dispersion techniques. All stacks at the facility follow good engineering practice.   |
| 20.2.82 NMAC                              | MACT Standards for source categories of HAPS            | Yes                         | 10 & 11                    | The following equipment are subject to the requirements of 40 CFR 63: <ul style="list-style-type: none"> <li>40 CFR 63, Subpart ZZZZ: Diesel Generator (Unit 10) and Fire Pump (Unit 11)</li> </ul>  |

**Table for Applicable Federal Regulations:**

| <a href="#">Federal Regulation Citation</a> | Title   | Applies?<br>Enter Yes or No | Unit(s) or Facility | Justification:   |
|---|---|-----------------------------|---------------------|--|
| 40 CFR 50                                   | NAAQS   | Yes                         | Facility            | If subject, this would normally apply to the entire facility.<br>This applies if you are subject to 20.2.70, 20.2.72, 20.2.74, and/or 20.2.79 NMAC.  |
| NSPS 40 CFR 60, Subpart A                   | General Provisions  | Yes                         | 1-9, 13, 14, & 16   | The following equipment of this facility are subject under the subparts of 40 CFR Part 60: <ul style="list-style-type: none"> <li>40 CFR 60, Subpart GG: Stationary gas turbines (Unit 1-3, 6 &amp; 7)</li> <li>40 CFR 60, Subpart Dc: Regeneration heaters (Unit 8 &amp; 13)</li> <li>40 CFR 60, Subpart KKK: Fugitive emissions (Unit 14) and flares (Unit 9 &amp; 16)</li> <li>40 CFR 60, Subpart KKKK: Stationary combustion turbines (Units 4-5)</li> </ul> |
| NSPS 40 CFR 60.40a, Subpart Da              | Subpart Da, Performance Standards for Electric Utility Steam Generating Units | No                          | N/A                 | This regulation establishes standards of performance for fossil-fuel-fired steam generators. This regulation does not apply as the facility does not have any fossil fuel-fired steam-generating units with a heat input rate of 250 MMBtu/hr [60.40(a)(1)].   |

| <a href="#">Federal Regulation Citation</a> | Title   | Applies?<br>Enter Yes or No | Unit(s) or Facility | Justification:  |
|---|---|-----------------------------|---------------------|---|
| NSPS 40 CFR60.40b Subpart Db                | Electric Utility Steam Generating Units   | No                          | N/A                 | This regulation establishes standards of performance for industrial-commercial-institutional steam generating units. This regulation does not apply because the facility does not operate any industrial-commercial-institutional steam generating units with a heat capacity greater than 100 MMBtu/hr.  |
| 40 CFR 60.40c, Subpart Dc                   | Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units   | Yes                         | 8 & 13              | Units 8 and 13 have a heat input greater than the 10 MMBtu/hr threshold and were constructed in 2011, after the June 9, 1989 applicability data (§60.40c(a)). Since these units combust only natural gas, there are no applicable standards, monitoring or reporting requirements. Records of fuel use are maintained in accordance with §60.48c(g)(1) and (2).   |
| NSPS 40 CFR 60, Subpart Ka                  | Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984                     | No                          | N/A                 | This regulation establishes performance standards for storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. The facility was not constructed prior to July 23, 1984. Thus, this rule does not apply to this facility.   |
| NSPS 40 CFR 60, Subpart Kb                  | Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 | No                          | N/A                 | This regulation establishes the standard performance for volatile organic liquid storage vessels with a capacity greater than 75 m <sup>3</sup> (~471 bbl). This facility does not have a tank with a capacity greater than 75 m <sup>3</sup> . Therefore, this regulation does not apply to the facility.  |
| NSPS 40 CFR 60.330 Subpart GG               | Stationary Gas Turbines   | Yes                         | 1-3, 6 & 7          | Units 1-3, 6, & 7 have a heat input greater than the 10 MMBtu/hr threshold and were installed in 1986, after the October 3, 1977 applicability date (§60.330(a)).   |
| NSPS 40 CFR 60, Subpart KKK                 | Leaks of VOC from Onshore Gas Plants  | Yes                         | 9, 14 & 16          | This regulation is applicable because portions of the gas plant are in wet gas or VOC service and were constructed after January 20, 1984 and before August 23, 2011 (§60.630(a)).  |
| NSPS 40 CFR Part 60 Subpart LLL             | Standards of Performance for Onshore Natural Gas Processing: SO <sub>2</sub> Emissions  | No                          | N/A                 | This regulation establishes standards of performance for SO <sub>2</sub> emissions from onshore natural gas processing for which construction, reconstruction, or modification of the amine sweetening unit commenced after January 20, 1984, and on or before August 23, 2011. This regulation is not applicable because although the plant is a natural gas processing plant, as defined by the subpart, the facility has a design capacity less than 2 long tons per day of H <sub>2</sub> S. (§60.640(b)) |

| <a href="#">Federal Regulation Citation</a> | Title  | Applies?<br>Enter Yes or No | Unit(s)<br>or Facility | Justification:   |
|---|--|-----------------------------|------------------------|--|
| NSPS<br>40 CFR Part<br>60 Subpart<br>OOOO   | Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015 | No                          | N/A                    | This regulation is not applicable because the plant does not have equipment covered under the regulation that was constructed, modified or reconstructed after August 23, 2011 and before September 18, 2015 (§60.5365).   |
| NSPS<br>40 CFR 60<br>Subpart<br>OOOOa       | Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced <b>After</b> September 18, 2015   | No                          | N/A                    | This regulation is not applicable because the plant does not have equipment covered under the regulation that was constructed, modified or reconstructed after September 18, 2015 (§60.5365(a)).   |
| NSPS 40 CFR<br>60 Subpart<br>IIII           | Standards of performance for Stationary Compression Ignition Internal Combustion Engines   | No                          | N/A                    | This regulation is not applicable as the compression ignition engines (Units 10 and 11) were manufactured and commenced construction prior to July 11, 2005 (§60.4200(a)(2)).  |
| NSPS<br>40 CFR 60<br>Subpart JJJJ           | Standards of Performance for Stationary Spark Ignition Internal Combustion Engines   | No                          | N/A                    | This regulation establishes standards of performance for stationary spark ignition internal combustion engines. This facility does not have any applicable equipment. Therefore, this regulation does not apply to this facility.  |
| NSPS 40 60<br>Subpart<br>KKKK               | Standards of Performance for Stationary Combustion Turbines  | Yes                         | 4-5                    | This applies to owners or operator of stationary combustion turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005, your turbine is subject to this subpart. Units 4-5 will be subject to this regulation, and per §60.4305(b), these stationary turbines are exempt from the requirements of NSPS Subpart GG. |
| NSPS 40 CFR<br>60 Subpart<br>TTTT           | Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units  | No                          | N/A                    | This regulation establishes standards of performance for greenhouse gas emissions for electric generating units. This facility does not have electric generating units. This regulation does not apply.  |
| NSPS 40 CFR<br>60 Subpart<br>UUUU           | Emissions Guidelines for Greenhouse Gas  | No                          | N/A                    | This regulation establishes emissions guidelines for greenhouse gas emissions and compliance times for electric generating units. This facility does not have electric generating units. This regulation does not apply.   |

| <a href="#">Federal Regulation Citation</a>   | Title  | Applies?<br>Enter Yes or No | Unit(s) or Facility        | Justification:   |
|---|--|-----------------------------|----------------------------|--|
|   | Emissions and Compliance Times for Electric Utility Generating Units   |                             |                            |  |
| NSPS 40 CFR 60, Subparts WWW, XXX, Cc, and Cf | Standards of performance for Municipal Solid Waste (MSW) Landfills   | No                          | N/A                        | This facility is not a municipal solid waste landfill. This regulation does not apply.   |
| NESHAP 40 CFR 61 Subpart A                    | General Provisions   | No                          | Units Subject to 40 CFR 61 | NSPS 40 CFR 61 does not apply to the facility because the facility does not emit or have the triggering substances on site and/or the facility is not involved in the triggering activity. The facility is not subject to this regulation. None of the subparts of Part 61 apply to the facility.  |
| NESHAP 40 CFR 61 Subpart E                    | National Emission Standards for <b>Mercury</b>   | No                          | N/A                        | The provisions of this subpart are applicable to those stationary sources that 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. This regulation does not apply.   |
| NESHAP 40 CFR 61 Subpart V                    | National Emission Standards for <b>Equipment Leaks</b> (Fugitive Emission Sources)   | No                          | N/A                        | This regulation establishes national emission standards for equipment leaks (fugitive emission sources). The facility does not have equipment that operates in volatile hazardous air pollutant (VHAP) service [40 CFR Part 61.240]. The regulated activities subject to this regulation do not take place at this facility. The facility is not subject to this regulation. |
| MACT 40 CFR 63, Subpart A                     | General Provisions   | Yes                         | 10 & 11                    | The following equipment are subject to the requirements of 40 CFR 63: <ul style="list-style-type: none"> <li>40 CFR 63, Subpart ZZZZ: Diesel Generator (Unit 10) and Fire Pump (Unit 11)</li> </ul>  |
| MACT 40 CFR 63.760 Subpart HH                 | Oil and Natural Gas Production Facilities  | No                          | N/A                        | This regulation establishes national emission standards for hazardous air pollutants from oil and natural gas production facilities. This facility does not have any applicable units. This regulation does not apply.   |
| MACT 40 CFR 63 Subpart HHH                    | National Emissions Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities                         | No                          | N/A                        | This regulation establishes national emission standards for hazardous air pollutants from natural gas transmission and storage facilities. This regulation does not apply because this facility is not a natural gas transmission or storage facility as defined in this regulation [40 CFR Part 63.1270(a)].  |
| MACT 40 CFR 63 Subpart DDDDD                  | National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and Institutional Boilers & Process Heaters | No                          | N/A                        | This regulation establishes national emission standards for a major source of HAPs for industrial, commercial, and institutional boilers and process heaters. This facility is not a major source of HAPs. Therefore, this regulation does not apply to this facility.   |
| MACT 40 CFR 63 Subpart UUUUU                  | National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric  | No                          | N/A                        | This regulation establishes national emission standards for hazardous air pollutants from coal and oil-fired electric utility steam generating units. The facility does not contain the affected units. This regulation does not apply.  |

| <a href="#">Federal Regulation Citation</a> | Title  | Applies?<br>Enter Yes or No | Unit(s) or Facility | Justification:  |
|---|--|-----------------------------|---------------------|---|
|   | Utility Steam Generating Unit  |                             |                     |   |
| MACT<br>40 CFR 63<br>Subpart ZZZZ           | National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT) | Yes                         | 10 & 11             | This regulation defines national emissions standards for HAPs from stationary reciprocating Internal Combustion Engines. This regulation applies because the plant is an area HAP source equipped with existing stationary RICE (§63.6590(a)(iii)). These units are subject to the emergency stationary RICE provisions of ZZZZ (§63.6603(a) and Table 2d, paragraphs 4 and 5). |
| 40 CFR 64                                   | Compliance Assurance Monitoring  | Yes                         | 1-3                 | Uncontrolled CO emissions from each of Units 1-3 are major in and of itself (394.20 TPY CO). Therefore, Unit 1-3 are subject to this regulation.  |
| 40 CFR 68                                   | Chemical Accident Prevention   | Yes                         | Facility            | The facility is an affected facility, as it will use flammable process chemicals such as propane at quantities greater than the thresholds. An RMP is maintained as required.   |
| Title IV – Acid Rain<br>40 CFR 72           | Acid Rain  | No                          | N/A                 | The facility does not operate an affected source under this subpart.  |
| Title IV – Acid Rain<br>40 CFR 73           | Sulfur Dioxide Allowance Emissions   | No                          | N/A                 | This regulation establishes sulfur dioxide allowance emissions for certain types of facilities. This facility is not an acid rain source. This regulation does not apply.   |
| Title IV-Acid Rain 40 CFR 75                | Continuous Emissions Monitoring  | No                          | N/A                 | The facility is not an acid rain source and is therefore not subject to this regulation.  |
| Title IV – Acid Rain<br>40 CFR 76           | Acid Rain Nitrogen Oxides Emission Reduction Program   | No                          | N/A                 | This regulation establishes an acid rain nitrogen oxide emission reduction program. This regulation applies to each coal-fired utility unit that is subject to an acid rain emissions limitation or reduction requirement for SO <sub>2</sub> . This part does not apply because the facility does not operate any coal-fired units [40 CFR Part 76.1].                         |
| Title VI –<br>40 CFR 82                     | Protection of Stratospheric Ozone  | No                          | N/A                 | This regulation establishes a regulation for the protection of the stratospheric ozone. The regulation is not applicable because the facility does not “service”, “maintain” or “repair” class I or class II appliances nor “dispose” of the appliances [40 CFR Part 82.1(a)].  |

# Section 14

## Operational Plan to Mitigate Emissions

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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- ☒ **Title V Sources** (20.2.70 NMAC): By checking this box and certifying this application the permittee certifies that it has developed an Operational Plan to Mitigate Emissions During Startups, Shutdowns, and Emergencies defining the measures to be taken to mitigate source emissions during startups, shutdowns, and emergencies as required by 20.2.70.300.D.5(f) and (g) NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- ☒ **NSR** (20.2.72 NMAC), **PSD** (20.2.74 NMAC) & **Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has developed an Operational Plan to Mitigate Source Emissions During Malfunction, Startup, or Shutdown defining the measures to be taken to mitigate source emissions during malfunction, startup, or shutdown as required by 20.2.72.203.A.5 NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- ☒ **Title V** (20.2.70 NMAC), **NSR** (20.2.72 NMAC), **PSD** (20.2.74 NMAC) & **Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has established and implemented a Plan to Minimize Emissions During Routine or Predictable Startup, Shutdown, and Scheduled Maintenance through work practice standards and good air pollution control practices as required by 20.2.7.14.A and B NMAC. This plan shall be kept on site or at the nearest field office to be made available to the Department upon request. This plan should not be submitted with this application.
- 

Startup and shutdown procedures are performed according to guidelines, which dictate proper procedural sequence to minimize emissions from the facility during such activities.

Equipment located at the plant is equipped with various safety devices that aid in preventing excess emissions to the atmosphere in the event of an operational emergency. In the event of a malfunction, startup, shutdown, or scheduled maintenance in which emission rates from the facility exceed permitted allowable, Hilcorp will notify the AQB in accordance with 20.2.7 NMAC and the equipment responsible for the exceedance will be repaired as soon as possible.

# Section 15

## Alternative Operating Scenarios

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

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

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

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There are no alternative operating scenarios at the San Juan Gas Plant, as Hilcorp understands the term.

# Section 16

## Air Dispersion Modeling

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

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

**Check each box that applies:**

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

|   |  |   |
|---|--|---|
| <p>New Mexico Environment Department<br/>Air Quality Bureau<br/>Modeling Section<br/>525 Camino de Los Marquez - Suite 1<br/>Santa Fe, NM 87505</p> <p>Phone: (505) 476-4300<br/>Fax: (505) 476-4375<br/><a href="http://www.env.nm.gov/air-quality/">www.env.nm.gov/air-quality/</a></p> |  | <p><b>For Department use only:</b></p> <p>Approved by:</p> <p>Date:</p> |
|---|--|---|

### Air Dispersion Modeling Waiver Request Form

This form must be completed and submitted with all air dispersion modeling waiver requests.

If an air permit application requires air dispersion modeling, in some cases the demonstration that ambient air quality standards and Prevention of Significant Deterioration (PSD) increments will not be violated can be satisfied with a discussion of previous modeling. The purpose of this form is to document and streamline requests to certify that previous modeling satisfies all or some of the current modeling requirements. The criteria for requesting and approving modeling waivers are found in the Air Quality Bureau Modeling Guidelines. Typically, only construction permit applications submitted per 20.2.72, 20.2.74, or 20.2.79 NMAC require air dispersion modeling. However, modeling is sometimes also required for a Title V permit application.

A waiver may be requested by e-mailing this completed form in **MS Word** format to the modeling manager, [sufi.mustafa@env.nm.gov](mailto:sufi.mustafa@env.nm.gov).

This modeling waiver is not valid if the emission rates in the application are higher than those listed in the approved waiver request.

#### Section 1 and Table 1: Contact and facility information:

|  |                                 |
|--|---------------------------------|
| Contact name   | Mike Celente                    |
| E-mail Address:                                      | mcelente@trinityconsultants.com |
| Phone  | (505) 266-6611                  |
| Facility Name  | San Juan Gas Plant              |
| Air Quality Permit Number(s)                         | 0613-M13                        |
| Agency Interest Number (if known)                    | 1177                            |
| Latitude and longitude of facility (decimal degrees) | 36.732500°, -107.966389°        |

**General Comments: (Add introductory remarks or comments here, including the purpose of and type of permit application.)**

Hilcorp Energy Company (Hilcorp) is requesting a Significant Revision to NSR Permit #0613M13 for its San Juan Gas Plant in accordance with 20.2.72.219.D(1)(a) NMAC. The facility is in the city of Bloomfield in San Juan County, New Mexico.

San Juan Gas plant processes natural gas from two field natural gas streams (high and low pressure) which are delivered to the plant where hydrocarbon liquids are extracted via a cryogenic process. The resulting residue gas and hydrocarbon liquids are delivered, primarily via pipelines, to customers.

Hilcorp is proposing to replace existing Emission Units (EU) 6 and 7, with newer units. NO<sub>x</sub>, CO, and VOC emissions for these units will also be modified based on updated manufacturer data provided by Solar. These units are also sources of PM and SO<sub>2</sub>.

## Section 2 – List All Regulated Pollutants from the Entire Facility - Required

In Table 2, below, list all regulated air pollutants emitted from your facility, except for New Mexico Toxic Air Pollutants, which are listed in Table 6 of this form. All pollutants emitted from the facility must be listed whether or not a modeling waiver is requested for that pollutant or if the pollutant emission rate is subject to the proposed permit changes.

**Table 2: Air Pollutant summary table (Check all that apply. Include all pollutants emitted by the facility):**

| Pollutant                 | Pollutant is not emitted at the facility and modeling or waiver are not required. | Pollutant does not increase in emission rate at any emission unit (based on levels currently in the permit) and stack parameters are unchanged. Modeling or waiver are not required. | Stack parameters or stack location has changed. | Pollutant is new to the permit, but already emitted at the facility. | Pollutant is increased at any emission unit (based on levels currently in the permit). | A modeling waiver is being requested for this pollutant. | Modeling for this pollutant will be included in the permit application. |
|---------------------------|---|--|---|--|--|--|---|
| CO                        |   |  | X   |  | X  | X  |   |
| NO <sub>2</sub>           |   |  | X   |  |  | X  |   |
| SO <sub>2</sub>           |   |  | X   |  | X  | X  |   |
| PM <sub>10</sub>          |   |  | X   |  | X  | X  |   |
| PM <sub>2.5</sub>         |   |  | X   |  | X  | X  |   |
| H <sub>2</sub> S          |   | X  |   |  |  |  |   |
| Reduced S                 | X   |  |   |  |  |  |   |
| O <sub>3</sub> (PSD only) | X   |  |   |  |  |  |   |
| Pb                        |   |  | X   |  | X  | X  |   |

## Section 3: Pollutants, other than NMTAPs, with very small emission rates

The Air Quality Bureau has performed generic modeling to demonstrate that small sources, as listed in Appendix 2 of this form, do not need computer modeling. This modeling compared emissions from a project (the increase in emissions from the previous permit or total facility emissions for a new facility) with significance levels. After comparing the project's emission rates for various pollutants to Appendix 2, list in Table 3 the pollutants that do not need to be modeled because of very small emission rates.

The facility must be at least 2 km from the nearest Class I area to qualify for a waiver due to very small emission rates. List the nearest Class I area and the distance from the facility in Section 3 comments.

Section 3 Comments. (If you are not requesting a waiver for any pollutants based on their low emission rate, then note that here. You do not need to complete the rest of Section 3 or Table 3.)

**Table 3: List of Pollutants with very small emission rates from the project**

| Pollutant         | Requested Allowable Emission Rate for Project (pounds/hour) | Release Type (select "all from stacks >20 ft" or "other") | Waiver Threshold (from appendix 2) (lb/hr) |
|-------------------|---|---|--|
| CO                | +4.53   | all from stacks >20 ft                                    | 16.037                                     |
| NO <sub>2</sub>   | -24.32  | all from stacks >20 ft                                    | 0.189                                      |
| Lead              | +0.0010   | all from stacks >20 ft                                    | 0.005                                      |
| PM <sub>10</sub>  | +0.054  | all from stacks >20 ft                                    | 0.255                                      |
| PM <sub>2.5</sub> | +0.054  | all from stacks >20 ft                                    | 0.056                                      |
| SO <sub>2</sub>   | +0.14   | All from stacks >20 ft                                    | 0.179                                      |

#### Section 4: Pollutants that have previously been modeled at equal or higher emission rates

List the pollutants and averaging periods in Table 4 for which you are requesting a modeling waiver based on previous modeling for this facility. The previous modeling reports that apply to the pollutant must be submitted with the modeling waiver request. Request previous modeling reports from the Modeling Section of the Air Quality Bureau if you do not have them and believe they exist in the AQB modeling file archive.

Section 4 Comments. (If you are not asking for a waiver based on previously modeled pollutants, note that here. You do not need to complete the rest of section 4 or table 4.) [Hilcorp is not requesting a waiver based on previously modeled pollutants.](#)

**Table 4: List of previously modeled pollutants (facility-wide emission rates)**

| Pollutant | Averaging period | Proposed emission rate<br>(pounds/hour) | Previously modeled<br>emission rate<br>(pounds/hour) | Proposed minus<br>modeled emissions<br>(lb/hr) | Modeled<br>percent of<br>standard or<br>increment | Year<br>modeled |
|-----------|------------------|---|--|--|---|-----------------|
|           |                  |   |  |  |   |                 |
|           |                  |   |  |  |   |                 |
|           |                  |   |  |  |   |                 |
|           |                  |   |  |  |   |                 |
|           |                  |   |  |  |   |                 |
|           |                  |   |  |  |   |                 |
|           |                  |   |  |  |   |                 |

#### Section 4, Table 5: Questions about previous modeling:

| Question   | Yes | No |
|--|-----|----|
| Was AERMOD used to model the facility?   |     |    |
| Did previous modeling predict concentrations less than 95% of each air quality standard and PSD increment?   |     |    |
| Were all averaging periods modeled that apply to the pollutants listed above?  |     |    |
| Were all applicable startup/shutdown/maintenance scenarios modeled?  |     |    |
| Did modeling include all sources within 1000 meters of the facility fence line that now exist?   |     |    |
| Did modeling include background concentrations at least as high as current background concentrations?  |     |    |
| If a source is changing or being replaced, is the following equation true for all pollutants for which the waiver is requested? (Attach calculations if applicable.)<br><div style="text-align: center;"><div><u>EXISTING SOURCE</u></div><math display="block">\frac{[(g) \times (h1)] + [(v1)^2/2] + [(c) \times (T1)]}{q1} \leq \frac{[(g) \times (h2)] + [(v2)^2/2] + [(c) \times (T2)]}{q2}</math><div><u>REPLACEMENT SOURCE</u></div></div> <p>Where<br/>g = gravitational constant = 32.2 ft/sec<sup>2</sup><br/>h1 = existing stack height, feet<br/>v1 = exhaust velocity, existing source, feet per second<br/>c = specific heat of exhaust, 0.28 BTU/lb-degree F<br/>T1 = absolute temperature of exhaust, existing source = degree F + 460<br/>q1 = emission rate, existing source, lbs/hour<br/>h2 = replacement stack height, feet<br/>v2 = exhaust velocity, replacement source, feet per second<br/>T2 = absolute temperature of exhaust, replacement source = degree F + 460<br/>q2 = emission rate, replacement source, lbs/hour</p> |     |    |

If you checked "no" for any of the questions, provide an explanation for why you think the previous modeling may still be used to demonstrate compliance with current ambient air quality standards.

## Section 5: Modeling waiver using scaled emission rates and scaled concentrations

At times it may be possible to scale the results of modeling one pollutant and apply that to another pollutant. Increases in emissions of one pollutant might also demonstrate compliance by applying a scaling factor to the modeling results. If the analysis for the waiver gets too complicated, then it becomes a modeling review rather than a modeling waiver, and applicable modeling fees will be charged for the modeling. Plume depletion, ozone chemical reaction modeling, post-processing, and unequal pollutant ratios from different sources are likely to invalidate scaling.

| Pollutant | Averaging period | Proposed emission rate<br>(pounds/hour) | Previously modeled<br>emission rate<br>(pounds/hour) | Scaled Impact*<br>(% of standard) | Modeled<br>percent of<br>standard or<br>increment | Year<br>modeled |
|-----------|------------------|---|--|-----------------------------------|---|-----------------|
|           |                  |   |  |                                   |   |                 |
|           |                  |   |  |                                   |   |                 |
|           |                  |   |  |                                   |   |                 |
|           |                  |   |  |                                   |   |                 |

\*Scaled Percent of Standard=Proposed Emission Rate (lb/hr) / Modeled Emission Rate (lb/hr) x Modeled Percent of Standard

If you are not scaling previous results, note that here. You do not need to complete the rest of section 5. Scaling analyses are not intended to be used for previously modeled pollutants with decreasing emissions, which is already addressed in section 4. [Hilcorp is not requesting a waiver based on scaled emission rates.](#)

To demonstrate compliance with standards for a pollutant describe scenarios below that you wish the modeling section to consider for scaling results.

|  |
|--|
|  |
|--|

## Section 6: New Mexico Toxic air pollutants – 20.2.72.400 NMAC

Modeling must be provided for any New Mexico Toxic Air Pollutant (NMTAP) with a facility-wide controlled emission rate in excess of the pound per hour emission levels specified in Tables A and B at **20.2.72.502 NMAC - Toxic Air Pollutants and Emissions**. An applicant may use a stack height correction factor based on the release height of the stack for the purpose of determining whether modeling is required. See Table C - Stack Height Correction Factor at 20.2.72.502 NMAC. Divide the emission rate for each release point of a NMTAP by the correction factor for that release height and add the total values together to determine the total adjusted pound per hour emission rate for that NMTAP. If the total adjusted pound per hour emission rate is lower than the emission rate screening level found in Tables A and B, then modeling is not required.

In Table 6, below, list the total facility-wide emission rates for each New Mexico Toxic Air Pollutant emitted by the facility. The table is pre-populated with common examples. Extra rows may be added for NMTAPS not listed or for NMTAPS emitted from multiple stack heights. NMTAPS not emitted at the facility may be deleted, left blank, or noted as 0 emission rate. Toxics previously modeled may be addressed in Section 5 of this waiver form. For convenience, we have listed the stack height correction factors in Appendix 1 of this form.

Section 6 Comments. (If you are not requesting a waiver for any NMTAPS then note that here. You do not need to complete the rest of section 6 or Table 6.)

[Hilcorp is not requesting a wavier for Toxics modeling.](#)

### Table 6: New Mexico Toxic Air Pollutants emitted at the facility

If requesting a waiver for any NMTAP, all NMTAPS from this facility must be listed in Table 3 regardless of if a modeling waiver is requested for that pollutant or if the pollutant emission rate is subject to the proposed permit changes.

| Pollutant | Requested Allowable | Release Height | Correction Factor | Allowable Emission Rate Divided by Correction Factor | Emission Rate Screening Level |
|-----------|---------------------|----------------|-------------------|--|-------------------------------|
|-----------|---------------------|----------------|-------------------|--|-------------------------------|

|  | Emission Rate<br>(pounds/hour) | (Meters) |  |  | (pounds/hour) |
|--|--------------------------------|----------|--|--|---------------|
| Ammonia  |                                |          |  |  | 1.20          |
| Asphalt (petroleum)<br>fumes                     |                                |          |  |  | 0.333         |
| Carbon black                                     |                                |          |  |  | 0.233         |
| Chromium metal                                   |                                |          |  |  | 0.0333        |
| Glutaraldehyde                                   |                                |          |  |  | 0.0467        |
| Nickel Metal                                     |                                |          |  |  | 0.0667        |
| Wood dust (certain hard<br>woods as beech & oak) |                                |          |  |  | 0.0667        |
| Wood dust (soft wood)                            |                                |          |  |  | 0.333         |
|  |                                |          |  |  |               |
| (add additional toxics if<br>they are present)   |                                |          |  |  |               |

## Section 7: Approval or Disapproval of Modeling Waiver

The AQB air dispersion modeler should list each pollutant for which the modeling waiver is approved, the reasons why, and any other relevant information. If not approved, this area may be used to document that decision.

Project emissions increases are less than the threshold listed in table 3. The new turbines have better dispersion characteristics compared to retiring turbines as provided below by the applicant.

| EXISTING SOURCE  |                          |  | REPLACEMENT SOURCE        |                          |  |
|--|--------------------------|--|---------------------------|--------------------------|--|
| $[(g) \times (h1)] + [(v1)^2/2] + [(c) \times (T1)] \leq [(g) \times (h2)] + [(v2)^2/2] + [(c) \times (T2)]$ |                          |  |                           |                          |  |
| q1   |                          |  | q2                        |                          |  |
| Where  |                          |  |                           |                          |  |
| g = gravitational constant = 32.2 ft/sec <sup>2</sup>  |                          |  |                           |                          |  |
| h1 = existing stack height, feet   |                          |  |                           |                          |  |
| v1 = exhaust velocity, existing source, feet per second  |                          |  |                           |                          |  |
| c = specific heat of exhaust, 0.28 BTU/lb-degree F   |                          |  |                           |                          |  |
| T1 = absolute temperature of exhaust, existing source = degree F + 460                                       |                          |  |                           |                          |  |
| q1 = emission rate, existing source, lbs/hour  |                          |  |                           |                          |  |
| h2 = replacement stack height, feet  |                          |  |                           |                          |  |
| v2 = exhaust velocity, replacement source, feet per second   |                          |  |                           |                          |  |
| T2 = absolute temperature of exhaust, replacement source = degree F + 460                                    |                          |  |                           |                          |  |
| q2 = emission rate, replacement source, lbs/hour   |                          |  |                           |                          |  |
|  |                          |  |                           |                          |  |
| <b>Existing Source</b>   |                          |  | <b>Replacement Source</b> |                          |  |
| <b>6352.12</b>   |                          |  | <b>11147.36</b>           |                          |  |
| Existing Turbine   |                          |  | New Turbine               |                          |  |
| g  | 32.2 ft/sec <sup>2</sup> |  | g                         | 32.2 ft/sec <sup>2</sup> |  |
| h1   | 30.8 ft                  |  | h2                        | 30.8 ft                  |  |
| v1   | 100 ft/s                 |  | v2                        | 139.98 ft/s              |  |
| c  | 0.28 BTU/lb*F            |  | c                         | 0.28 BTU/lb*F            |  |
| T1   | 1287 F                   |  | T2                        | 1280 F                   |  |
| q1   | 1 lb/hr                  |  | q2                        | 1 lb/hr                  |  |
|  |                          |  |                           |                          |  |
| <b>IS EXISTING SOURCE VALUE &lt; REPLACEMENT SOURCE VALUE?</b>   |                          |  |                           |                          |  |
| <b>YES</b>   |                          |  |                           |                          |  |



**Appendix 1: Stack Height Release Correction Factor (adapted from 20.2.72.502 NMAC)**

| Release Height in Meters | Correction Factor |
|--------------------------|-------------------|
| 0 to 9.9                 | 1                 |
| 10 to 19.9               | 5                 |
| 20 to 29.9               | 19                |
| 30 to 39.9               | 41                |
| 40 to 49.9               | 71                |
| 50 to 59.9               | 108               |
| 60 to 69.9               | 152               |
| 70 to 79.9               | 202               |
| 80 to 89.9               | 255               |
| 90 to 99.9               | 317               |
| 100 to 109.9             | 378               |
| 110 to 119.9             | 451               |
| 120 to 129.9             | 533               |
| 130 to 139.9             | 617               |
| 140 to 149.9             | 690               |
| 150 to 159.9             | 781               |
| 160 to 169.9             | 837               |
| 170 to 179.9             | 902               |
| 180 to 189.9             | 1002              |
| 190 to 199.9             | 1066              |
| 200 or greater           | 1161              |

**Appendix 2. Very small emission rate modeling waiver requirements (updated 7/27/2023)**

**Modeling is waived if emissions of a pollutant for the project are below the amount:**

| Pollutant                                     | If all emissions come from stacks 20 feet or greater in height and there are no horizontal stacks or raincaps (lb/hr) | If not all emissions come from stacks 20 feet or greater in height, or there are horizontal stacks, raincaps, volume, or area sources (lb/hr) |
|---|---|---|
| CO  | 16.037  | 2.580   |
| H <sub>2</sub> S (Pecos-Permian Basin)        | 0.114   | 0.015   |
| H <sub>2</sub> S (Not in Pecos-Permian Basin) | 0.022   | 0.003   |
| Lead  | 0.005   | 0.001   |
| NO <sub>2</sub>                               | 0.189   | 0.024   |
| PM <sub>2.5</sub> – Point Sources             | 0.056   | 0.009   |
| PM <sub>2.5</sub> – Volume Sources            |   | 0.003   |
| PM <sub>10</sub> – Point Sources              | 0.255   | 0.039   |
| PM <sub>10</sub> – Volume Sources             |   | 0.015   |
| SO <sub>2</sub>                               | 0.179   | 0.023   |
| Reduced sulfur (Pecos-Permian Basin)          | 0.033   | No waiver   |
| Reduced sulfur (Not in Pecos-Permian Basin)   | No waiver   | No waiver   |

**From:** [Mustafa, Sufi A., ENV](#)  
**To:** [Mike Celente](#)  
**Subject:** RE: [EXTERNAL] RE: Modeling Waiver for Hilcorp - San Juan Gas Plant  
**Date:** Thursday, January 11, 2024 5:22:00 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)  
[0613M13 San Juan Gas Plant Modeling Waiver 01112024.pdf](#)

---

Mike

I approved your request.

Thank you.

Sufi A. Mustafa, Ph.D.

Manager Air Dispersion Modeling and Emission Inventory Section

New Mexico Environment Department's Air Quality Bureau

Office: (505) 629 6186

[sufi.mustafa@state.nm.us](mailto:sufi.mustafa@state.nm.us)

525 Camino de los Marquez

Suite 1

Santa Fe, New Mexico, 87505

<https://www.env.nm.gov/air-quality/>



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---

**From:** Mike Celente <MCelente@trinityconsultants.com>

**Sent:** Thursday, January 11, 2024 11:15 AM

**To:** Mustafa, Sufi A., ENV <sufi.mustafa@env.nm.gov>

**Subject:** RE: [EXTERNAL] RE: Modeling Waiver for Hilcorp - San Juan Gas Plant

Great, thanks Sufi. Please find the requested calculations attached.

Best,

Mike

**Michael Celente, M.S.**

Managing Consultant

P 505.266.6611 M 973.508.5215

9400 Holly Ave NE, Building 3, Suite B | Albuquerque, NM 87122

Email: [mcelente@trinityconsultants.com](mailto:mcelente@trinityconsultants.com)



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**From:** Mustafa, Sufi A., ENV <[sufi.mustafa@env.nm.gov](mailto:sufi.mustafa@env.nm.gov)>

**Sent:** Wednesday, January 10, 2024 3:58 PM

**To:** Mike Celente <[MCelente@trinityconsultants.com](mailto:MCelente@trinityconsultants.com)>

**Subject:** RE: [EXTERNAL] RE: Modeling Waiver for Hilcorp - San Juan Gas Plant

Mike

You are replacing engines. It will be a good documentation of the emissions and dispersion characteristics if you provide the information in the modeling waiver form as I suggested. I believe the project qualifies for a waiver.

Thank you.

Sufi A. Mustafa, Ph.D.

Manager Air Dispersion Modeling and Emission Inventory Section

New Mexico Environment Department's Air Quality Bureau

Office: (505) 629 6186

[sufi.mustafa@state.nm.us](mailto:sufi.mustafa@state.nm.us)

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**From:** Mike Celente <[MCelente@trinityconsultants.com](mailto:MCelente@trinityconsultants.com)>

**Sent:** Monday, January 8, 2024 1:16 PM

**To:** Mustafa, Sufi A., ENV <[sufi.mustafa@env.nm.gov](mailto:sufi.mustafa@env.nm.gov)>

**Cc:** Peters, Eric, ENV <[eric.peters@env.nm.gov](mailto:eric.peters@env.nm.gov)>

**Subject:** RE: [EXTERNAL] RE: Modeling Waiver for Hilcorp - San Juan Gas Plant

Hi Sufi,

Thanks for the response. I was under the impression that Section 4 was only required if we are requesting a modeling waiver based on previous modeling for this facility. This is not the case, as we are requesting a waiver under Section 3 for very small emission rates. Although the turbines are being replaced, the minor increase in emissions in CO, Pb, PM, and SO2 falls within the very small

emission rates, and these newer units actually have new NOx control technology thus resulting in a net decrease in NOx emissions (when compared to the existing units).

With that being said, the newer units will have the same stack height (30.8 ft) and diameter (3.3 ft) as the existing units, but with an increase in exit velocity from 100 ft/s to 140 ft/s. As such, the dispersion characteristics of the new turbines will be greater than that of the current units. As noted in Section 3, as the proposed project emissions (when compared to the previous permit) fall below the emissions in Table 3, it is assumed that the modeled impacts from the new turbines will fall below significance levels.

Best,  
Mike

**Michael Celente, M.S.**  
Managing Consultant

P 505.266.6611 M 973.508.5215  
9400 Holly Ave NE, Building 3, Suite B | Albuquerque, NM 87122  
Email: [mcelente@trinityconsultants.com](mailto:mcelente@trinityconsultants.com)



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**From:** Mustafa, Sufi A., ENV <[sufi.mustafa@env.nm.gov](mailto:sufi.mustafa@env.nm.gov)>

**Sent:** Monday, January 8, 2024 11:29 AM

**To:** Mike Celente <[MCelente@trinityconsultants.com](mailto:MCelente@trinityconsultants.com)>

**Cc:** Peters, Eric, ENV <[eric.peters@env.nm.gov](mailto:eric.peters@env.nm.gov)>

**Subject:** RE: [EXTERNAL] RE: Modeling Waiver for Hilcorp - San Juan Gas Plant

Mike

Please complete various sections applicable to this request.

Table 3 list a negative NO2 emission rate. If this means project emissions (change in NO2 emissions from this permit modification i.e; new engines is less than older engines) please provide information in table 4 to help me evaluate your request. Since you are changing engines, please provide comparison of air dispersion equation in Section 4, table 5.

Thank you.

Sufi A. Mustafa, Ph.D.

Manager Air Dispersion Modeling and Emission Inventory Section  
New Mexico Environment Department's Air Quality Bureau  
Office: (505) 629 6186  
[sufi.mustafa@state.nm.us](mailto:sufi.mustafa@state.nm.us)

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---

**From:** Mike Celente <[MCelente@trinityconsultants.com](mailto:MCelente@trinityconsultants.com)>  
**Sent:** Tuesday, January 2, 2024 10:13 AM  
**To:** Mustafa, Sufi A., ENV <[sufi.mustafa@env.nm.gov](mailto:sufi.mustafa@env.nm.gov)>  
**Cc:** Peters, Eric, ENV <[eric.peters@env.nm.gov](mailto:eric.peters@env.nm.gov)>  
**Subject:** [EXTERNAL] RE: Modeling Waiver for Hilcorp - San Juan Gas Plant

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Good morning and Happy New Year!

Just wanted to follow up on the below email and modeling waiver request. Please note that since the original submittal, the units to be replaced have changed from Units 6 and 7 to Units 4 and 5 (which are identical to the original replacement units). As such, there is no anticipated change in information represented in the original waiver request. Thank you!

Best,  
Mike

**Michael Celente, M.S.**  
Managing Consultant

P 505.266.6611 M 973.508.5215  
9400 Holly Ave NE, Building 3, Suite B | Albuquerque, NM 87122  
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---

**From:** Mike Celente  
**Sent:** Friday, December 8, 2023 1:35 PM  
**To:** Mustafa, Sufi A., NMENV <[sufi.mustafa@state.nm.us](mailto:sufi.mustafa@state.nm.us)>  
**Cc:** [eric.peters@state.nm.us](mailto:eric.peters@state.nm.us)  
**Subject:** Modeling Waiver for Hilcorp - San Juan Gas Plant

Hi Sufi,

Please find a modeling waiver attached for Hilcorp's San Juan Gas Plant. Hilcorp is proposing to replace two existing turbines (Units 6 and 7), with more modern replacement units. Updated emissions from these units fall under the very small emission rates for all pollutants, as noted in the attached waiver.

Please do not hesitate to reach out should you have any questions!

Best,  
Mike

**Michael Celente, M.S.**  
Managing Consultant

P 505.266.6611 M 973.508.5215  
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# Section 17

## Compliance Test History

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

To save paper and to standardize the application format, delete this sentence and the samples in the Compliance Test History Table, and begin your submittal for this attachment on this page.

**Compliance Test History Table**

| Unit No. | Test Description   | Test Date  |
|----------|--|--|
| 1-7      | Tested in accordance with EPA test methods for NO <sub>x</sub> and CO as required by Title V permit P124-R4. | 4/24/2019, 6/9/2020,<br>6/9/2021, 6/8/2022,<br>9/13/2023 |

# Section 20

## Other Relevant Information

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

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

---

N/A - No other relevant information for this facility.

## Section 22: Certification

Company Name: Hilcorp Energy Company

I, Matt Henderson, 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 12 day of December, 2023, upon my oath or affirmation, before a notary of the State of

Texas.

Matt Henderson  
\*Signature

12-12-23  
Date

Matt Henderson  
Printed Name

Env. Manager  
Title

Scribed and sworn before me on this 12<sup>th</sup> day of December, 2023.

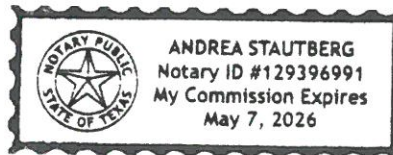
My authorization as a notary of the State of Texas expires on the

7<sup>th</sup> day of May, 2026.

Andrea Stautberg  
Notary's Signature

12-12-23  
Date

Andrea Stautberg  
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.