

Section 3

Application Summary

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

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

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

XTO Energy Inc. (XTO) is submitting this updated initial Title V Operating permit application to the New Mexico Environmental Department (NMED) for the Spartan Compressor Station. This application is submitted under section 20.2.70.200.A of the New Mexico Administrative Code (NMAC).

The Spartan Compressor Station is a typical compressor station with natural gas engines, dehydration, storage tanks, and flares. The facility is currently authorized under New Source Review (NSR) Permit 7681-M2, issued on February 11, 2022. XTO is submitting this updated application to reflect the current issuance of NSR Permit 7681-M2.

Routine SSM combustion emissions are included with the regular emissions of the facility. SSM emissions from equipment maintenance are routed to either the low pressure or high-pressure flare header (FL1/FL2/FL3). SSM-related VOC emissions (tank landings, cleanings, pigging, compressor blowdowns, equipment blowdowns, etc.) are included at a rate of 10 tons per year per NMAQB guidance. Further detailed calculations are included in the application.

Section 4

Process Flow Sheet

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

A process flow diagram is included with this application.

Section 5

Plot Plan Drawn To Scale

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

A plot plan is included with this application.

Section 6

All Calculations

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

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

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

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

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

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

Significant Figures:

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

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

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

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

Control Devices: In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions. The applicant can indicate in this section of the

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

Caterpillar 3616TA (ENG-1 to ENG-9) and 3516TA (ENG-11 to ENG-12)

Emission factors for nitrogen oxides (NO_x), carbon monoxide (CO), formaldehyde, and volatile organic compounds (VOC) are based on manufacturer's data. Emissions of particulate matter (PM/PM₁₀ and PM_{2.5}) were calculated using AP-42 Table 3.2-3 factors. PM₁₀ and PM_{2.5} emissions are set equal to PM emissions. SO₂ emissions are based on the units' fuel consumption and a sulfur content of 5 grains per 100 standard cubic feet (5 gr/100 scf). Hazardous Air Pollutants (HAPs) except for formaldehyde were calculated using AP-42 factors.

Line Heater (HTR1) and Glycol Regenerator Heaters (RB1 to RB3)

Emission of NO_x, CO, VOC, HAP, and PM/PM₁₀/PM_{2.5} are based on AP-42, Chapter 1, Tables 1.4-1, 1.4-2, and 1.4-3 emission factors. PM₁₀ and PM_{2.5} emissions are set equal to PM emissions. SO₂ emissions were based on the unit's fuel consumption and a maximum sulfur content of 5 grains per 100 standard cubic feet (5 gr/100 scf).

SSM/Emergency Flares (FL1 – FL3)

The facility will use three (3) dual-tip flares. NO_x and CO emissions are based on factors from the Texas Commission on Environmental Quality (TCEQ) publication RG-360A/11. VOC emissions were calculated using a material balance and the manufacturer's guaranteed destruction efficiency (98%). Since gas can be routed to any or all of the flares, they are illustrated as one combine emission point. The flares have a control efficiency of 98%, with manufacturer documentation provided in Section 7 of the application. SSM activities routed to the flares could include process vessel purging and maintenance blowdowns for process equipment, high pressure gas flaring, and low pressure separator gas during VRU downtime. Tank vapors and 2% of the low pressure separator gas not collected by the VRU are continuously routed to the low pressure side of the flare.

Triethylene Glycol Dehydrators (DEHY1-DEHY3)

Emissions from the dehydrators are calculated using BR&E ProMax simulation software. Flash tank vapors are routed back to mixing with the inlet gas. For up to 438 hours, flash vapors are routed to the flares (FL1 - FL3). Each dehydrator is equipped with a condenser. Condensed liquids are routed to the skim tank and any remaining gas is burned at the flares (FL1 - FL3). The emissions being released at FL1-FL3 from the dehydration process are represented as a separate emission point (DEHY1-DEHY3). For up to 300 hours in a year, flash and condenser vapors can be routed to the reboiler (RB1 - RB3) during SSM. Emissions are represented as (DEHY1 SSM - DEHY3 SSM).

Storage Tanks (SKT1-SKT2, OT1-OT4, WT1-WT2)

Flashing, working and breathing emissions from the skim tank, oil tanks, and water tanks were calculated using BR&E ProMax simulation software. Emissions from the tanks are controlled using FL1-FL3. The simulation reports are included in Section 7.

Truck Loading (LOAD)

Uncontrolled emissions from oil loading of trucks were calculated using Equation 1 of AP-42 Section 5.2. Maximum condensate loading rates are calculated using 1836 BOPD and 75,000 BOPY. Relevant portions of AP-42 Section 5.2 are included in Section 7. Oil truck loading will be uncontrolled.

Water Truck Loading (LOAD2)

Uncontrolled emissions from water loading of trucks were calculated using Equation 1 of AP-42 Section 5.2. Maximum loading rates are calculated using 521 BWPD for 365 days of the year. Relevant portions of AP-42 Section 5.2 are included in Section 7. Oil truck loading will be uncontrolled.

Piping Component Fugitive Emissions (FUG)

Facility fugitive emissions were calculated using TCEQ's "Air Permit Technical Guidance for Chemical Sources – Fugitive Guidance" document, and conservatively assumed component counts. Reduction efficiencies were obtained from EPA's Protocol for Equipment Leak Emission Estimates (EPA-453/R-95-017). Relevant portions of the TCEQ document are included in Section 7.

Startup, Shutdown, and Maintenance (SSM)

SSM emissions not routed to the flare system were assumed equal to the flat 10 tpy of VOC per State guidance. Specific SSM emissions include small equipment blowdowns, tank emptying and refilling, tank roof landing, and miscellaneous activities. Other SSM emissions are routed to the flare and calculated in accordance with the flare methodology above.

Haul Road Fugitive Emissions

Fugitive haul road emissions were calculated using Equations 1a and 2 of AP-42 Section 13.2.2. Relevant portions of AP-42 Section 13.2.2 are included in Section 7.

Malfunction Emissions (MALFUCNTION)

Malfunction emissions not routed to the flare system were assumed equal to the flat 10 tpy of VOC per State guidance. Specific malfunction emissions include any sudden and unavoidable failure of air pollution control equipment or process equipment beyond the control of the owner or operator.

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 (CO₂), nitrous oxide (N₂O), methane (CH₄), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆).

Calculating GHG Emissions:

1. Calculate the ton per year (tpy) GHG mass emissions and GHG CO₂e 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 CO₂e 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 CO₂e emissions in Table 2-P of this application. Emissions are reported in **short** tons per year and represent each emission unit's Potential to Emit (PTE).
5. All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO₂e emissions for each unit in Table 2-P.
6. For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following By checking this box, the applicant acknowledges the total CO₂e emissions are less than 75,000 tons per year.

Sources for Calculating GHG Emissions:

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

Global Warming Potentials (GWP):

Applicants must use the Global Warming Potentials codified in Table A-1 of the most recent version of 40 CFR 98 Mandatory Greenhouse Gas Reporting. The GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to that of one unit mass of CO₂ over a specified time period.

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

Metric to Short Ton Conversion:

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

Section 7

Information Used To Determine Emissions

Information Used to Determine Emissions shall include the following:

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

All supporting documentation is provided in this section.

Section 8

Map(s)

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

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

A site location map and aerial image illustrating the property boundary and surrounding access roads is provided with this 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”)

I have read the AQB “Guidelines for Public Notification for Air Quality Permit Applications”

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

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

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

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

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

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

Public Notice is not required for Title V permit applications.

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.

Field gas flows into two inlet slug catchers. The site uses natural gas engines to compress the field gas to 1200-1300 psig, including nine (9) Caterpillar 3616TA engines (ENG1-ENG9) and two (2) Caterpillar 3516J engines (ENG11-ENG12). The Caterpillar engines are equipped with oxidation catalysts to reduce CO, VOC, and formaldehyde emissions.

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

Low pressure liquids generated anywhere in the system are routed to a low pressure three phase separator (LPS). Vapors from the LPS are controlled by a VRU and routed to compression. When the LPS VRU is not operational, vapors from the LPS are routed to the flare system (FL1 – FL3). From the LPS, oil at approximately 15 psig is dumped to four (4) oil storage tanks (OT1-OT4), which are controlled by the flare system (FL1 – FL3). Water from the LPS flows to redundant skim tanks (SKT1/SKT2). The skim tanks are arranged as a redundant system in which one unit can be used if another is down for unforeseen circumstances. Water is then dumped to two (2) water tanks (WT1-WT2).

Any residual oil flows from the skim tanks into the oil storage tanks. The oil from the oil storage tanks are then pumped back into the high pressure three phase separator (HPS), to be transferred offsite via pipeline. Vapors from the water storage tanks and skim tanks are also controlled by the flare system (FL1 – FL3). Oil can be trucked offsite or pumped offsite via pipeline, water is transferred offsite via pipeline to saltwater disposal (SWD).

High pressure liquids generated anywhere in the system are routed to high pressure three phase separator (HPS). Vapors from the high pressure separator are routed back to the inlet slug catchers. From the HPS, liquid hydrocarbons at approximately 400 psig are transferred offsite via pipeline pipeline. Water from the HPS is transferred offsite via pipeline to SWD.

The flare system (FL1 – FL3) is also used to flare gas in the event of an emergency.

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):

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

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

Yes **No**

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

Yes **No**

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

Yes **No**

C. Make a determination:

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

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

Section 12

Section 12.A

PSD Applicability Determination for All Sources

(Submitting under 20.2.72, 20.2.74 NMAC)

This application is not for a NSR application submitted under 20.2.72 or 20.2.74 NMAC.

Section 13

Determination of State & Federal Air Quality Regulations

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

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

Required Information for Specific Equipment:

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

Required Information for Regulations that Apply to the Entire Facility:

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

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

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

Regulatory Citations for Emission Standards:

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

Federally Enforceable Conditions:

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

INCLUDE ANY OTHER INFORMATION NEEDED TO COMPLETE AN APPLICABILITY DETERMINATION OR THAT IS 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/>

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this attachment on this page.

Example of a Table for STATE REGULATIONS:

<u>STATE REGU- LATIONS CITATION</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.1 NMAC	General Provisions	Yes	Facility	General Provisions apply to Notice of Intent, Construction, and Title V permit applications.
20.2.3 NMAC	Ambient Air Quality Standards NMAAQs	Yes	Facility	If subject, this would normally apply to the entire 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. Title V applications, see exemption at 20.2.3.9 NMAC The TSP NM ambient air quality standard was repealed by the EIB effective November 30, 2018.
20.2.7 NMAC	Excess Emissions	Yes	Facility	If subject, this would normally apply to the entire facility. If your entire facility or individual pieces of equipment are subject to emissions limits in a permit or numerical emissions standards in a federal or state regulation, this applies. This would not apply to Notices of Intent since these are not permits.
20.2.23 NMAC	Fugitive Dust Control	No	Facility	This regulation may apply if, this is an application for a notice of intent (NOI) per 20.2.73 NMAC, if the activity or facility is a fugitive dust source listed at 20.2.23.108.A NMAC, and if the activity or facility is located in an area subject to a mitigation plan pursuant to 40 CFR 51.930. http://164.64.110.134/parts/title20/20.002.0023.html As of January 2019, the only areas of the State subject to a mitigation plan per 40 CFR 51.930 are in Doña Ana and Luna Counties. Sources exempt from 20.2.23 NMAC are activities and facilities subject to a permit issued pursuant to the NM Air Quality Control Act, the Mining Act, or the Surface Mining Act (20.2.23.108.B NMAC). 20.2.23.108 APPLICABILITY: A. This part shall apply to persons owning or operating the following fugitive dust sources in areas requiring a mitigation plan in accordance with 40 CFR Part 51.930: (1) disturbed surface areas or inactive disturbed surface areas, or a combination thereof, encompassing an area equal to or greater than one acre; (2) any commercial or industrial bulk material processing, handling, transport or storage operations. B. The following fugitive dust sources are exempt from this part: (1) agricultural facilities, as defined in this part; (2) roadways, as defined in this part; (3) operations issued permits pursuant to the state of New Mexico Air Quality Control Act, Mining Act or Surface Mining Act; and (4) lands used for state or federal military activities. [20.2.23.108 NMAC - N, 01/01/2019]
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	No	N/A	None of the equipment has a rating greater than 1,000,000 million British Thermal Units per year.
20.2.34 NMAC	Oil Burning Equipment: NO ₂	No	N/A	This facility has no oil burning equipment.
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	No	N/A	This facility is not a gas processing plant.
20.2.37 and 20.2.36 NMAC	Petroleum Processing Facilities and Petroleum Refineries	N/A	N/A	These regulations were repealed by the Environmental Improvement Board. If you had equipment subject to 20.2.37 NMAC before the repeal, your combustion emission sources are now subject to 20.2.61 NMAC.

<u>STATE REGU- LATIONS CITATION</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.38 NMAC	Hydrocarbon Storage Facility	Yes	OT1- OT4	The site uses a flare to comply with 20.2.38 NMAC.
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	No	N/A	The facility does not operate a sulfur recovery plant.
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	FL1-3, RB1-3, ENG1- 9, ENG11 -12, HTR1	This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares unless your equipment is subject to another state regulation that limits particulate matter such as 20.2.19 NMAC (see 20.2.61.109 NMAC).
20.2.70 NMAC	Operating Permits	Yes	Facility	The facility's potential to emit (PTE) is 100 tpy or more of any regulated air pollutant other than HAPs; and/or a HAPs PTE of 10 tpy or more for a single HAP resulting in the facility's classification as being a major source.
20.2.71 NMAC	Operating Permit Fees	Yes	Facility	This facility is subject to 20.2.70 NMAC and includes numerical ton per year emission limits; therefore, this facility is subject to 20.2.71 NMAC and normally applies to the entire facility.
20.2.72 NMAC	Construction Permits	Yes	Facility	This facility is currently authorized under NSR permit 7474-M2, issued on February 11, 2022. Note: This is not an application pursuant to 20.2.72 NMAC.
20.2.73 NMAC	NOI & Emissions Inventory Requirements	Yes	Facility	The site is subject to 20.2.72 NMAC.
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	No	N/A	The facility is not a major PSD site.
20.2.75 NMAC	Construction Permit Fees	No	N/A	This is not an application pursuant to 20.2.72, 20.2.73, 20.2.74, and/or 20.2.79 NMAC.
20.2.77 NMAC	New Source Performance	Yes	Units subject to 40 CFR 60	This is a stationary source which is subject to the requirements of 40 CFR Part 60, Subparts A, OOOOa, and JJJJ.
20.2.78 NMAC	Emission Standards for HAPS	No	N/A	No units are subject to the subparts found in 40 CFR 61.
20.2.79 NMAC	Permits – Nonattainment Areas	No	N/A	The facility is not located in a nonattainment area.

<u>STATE REGU-LATIONS CITATION</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.80 NMAC	Stack Heights	No	N/A	There are no stacks to which this regulation would apply.
20.2.82 NMAC	MACT Standards for source categories of HAPS	Yes	Units Subject to 40 CFR 63	See regulatory discussion in Federal Regulations Citation section.

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

<u>FEDERAL REGU-LATIONS CITATION</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
40 CFR 50	NAAQS	Yes	Facility	Compliance with the requirements of the NSR permit indicates compliance with NAAQS.
NSPS 40 CFR 60, Subpart A	General Provisions	Yes	Units subject to 40 CFR 60	NSPS OOOOa: ENG1-ENG9; ENG11-ENG12; FUG NSPS JJJJ: ENG1-ENG9; ENG11-ENG12
NSPS 40 CFR60.40a, Subpart Da	Subpart Da, Performance Standards for Electric Utility Steam Generating Units	No	N/A	The facility does not operate any electric utility steam generating units.
NSPS 40 CFR60.40b Subpart Db	Electric Utility Steam Generating Units	No	N/A	The facility does not operate any electric utility steam generating units.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	No	N/A	The facility does not operate any electric utility steam generating units.

<u>FEDERAL REGU- LATIONS CITATION</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
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	The site does not contain storage tanks constructed prior to July 23, 1984.
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	The hydrocarbons are stored in vessels with a design capacity less than 1,589.874 m ³ and are stored prior to custody transfer. §60.110b(d)(4)
NSPS 40 CFR 60.330 Subpart GG	Stationary Gas Turbines	No	N/A	The facility does not operate any stationary gas turbines.
NSPS 40 CFR 60, Subpart KKK	Leaks of VOC from Onshore Gas Plants	No	N/A	The facility is not a gas plant.
NSPS 40 CFR Part 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing; SO₂ Emissions	No	N/A	The facility does not operate a sweetening unit.
NSPS 40 CFR Part 60 Subpart OOOo	Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution for which construction, modification or reconstruction commenced after August 23, 2011 and before September 18, 2015	No	N/A	The site was constructed after 9/18/15. See NSPS OOOOa discussion below.
NSPS 40 CFR Part 60 Subpart OOOo _a	Standards of Performance for Crude Oil and Natural Gas Facilities for which	Yes	ENG1-ENG9; ENG11-ENG12; FUG	The storage tanks were constructed after the applicability date of the rule; however, XTO is requesting emissions be limited by permit to less than 6 tpy. The regulation is not applicable to the storage tanks per 60.5365a(e). The site uses low-bleed pneumatic controllers which are not applicable per 60.5365a(d)(1). The gun barrels are not storage tanks. The site will be subject to leak monitoring

<u>FEDERAL REGU- LATIONS CITATION</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
	Construction, Modification or Reconstruction Commenced After September 18, 2015			from fugitive components per 60.5365a(j) and will comply with 60.5397a. ENG1-ENG9 and ENG11-ENG12 are reciprocating compressor engines and will comply with 60.5385a.
NSPS 40 CFR 60 Subpart IIII	Standards of performance for Stationary Compression Ignition Internal Combustion Engines	No	N/A	The facility does not operate any affected sources.
NSPS 40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Yes	ENG1- ENG9; ENG11- ENG12	ENG1-ENG9 and ENG11-ENG12 engines are non-emergency Spark Ignition engines. ENG1-ENG9 and ENG11-ENG12 engines are manufactured after 7/1/2010 and have a maximum engine power greater than 500 HP. ENG1-ENG9 and ENG11- ENG12 engines are subject to the limitations in Table 1 per 40 CFR 60.4233(e). ENG13 engine is manufactured after 1/1/2011 and has a maximum engine power greater than 100 HP, but less than 500 HP. ENG13 engine is subject to the limitations in Table 1 per 40 CFR 60.4233(e).
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	No	N/A	The facility does not operate any affected sources.
NSPS 40 CFR 60 Subpart UUUU	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units	No	N/A	The facility does not operate any affected sources.
NSPS 40 CFR 60, Subparts WWW, XXX, Cc, and Cf	Standards of performance for Municipal Solid Waste (MSW) Landfills	No	N/A	The facility does not operate any affected sources.
NESHAP 40 CFR 61 Subpart A	General Provisions	No	N/A	No units are subject to the subparts found in 40 CFR 61.
NESHAP 40 CFR 61 Subpart E	National Emission Standards for Mercury	No	N/A	The facility does not operate any affected sources.
NESHAP 40 CFR 61 Subpart V	National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	No	N/A	The facility does not operate any affected sources.
MACT 40 CFR 63, Subpart A	General Provisions	Yes	Units Subject to 40 CFR 63	MACT HH – DEHY1-3 MACT ZZZZ – ENG1-ENG9; ENG11-ENG12

FEDERAL REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
MACT 40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities	Yes	DEHY1- 3	The facility is not a major source of HAPs as defined in §63.761. The dehydrators process more than 3 mmscf (85,000 standard cubic meters per day); however, since benzene emissions are less than 1 tpy (0.9 Mg/year), per §63.764(e)(1) the dehydrators are exempt from the requirements of §63.764(d) except for the recordkeeping requirements in §63.774(d)(1).
MACT 40 CFR 63 Subpart HHH		No	N/A	The facility does not operate any affected sources.
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	The facility is not a major source of HAP as defined in §63.7575 “Major source for oil and natural gas production facilities”. Therefore, MACT 40 CFR 63 Subpart DDDDD does not apply.
MACT 40 CFR 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric Utility Steam Generating Unit	No	N/A	The facility does not operate any affected sources.
MACT 40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	ENG1- ENG9; ENG11- ENG12	The site is a major source of HAP. ENG1-ENG9 and ENG11-ENG12 engines are 4SLB RICE engines with an engine rating greater than 500 HP subject to the limitations in 63.6600(b)-Table 2a.2.
40 CFR 64	Compliance Assurance Monitoring	No	N/A	The facility is not subject to CAM.

<u>FEDERAL REGU- LATIONS CITATION</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION:
40 CFR 68	Chemical Accident Prevention	No	N/A	The facility does not store any chemicals above threshold quantities.
Title IV – Acid Rain 40 CFR 72	Acid Rain	No	N/A	The facility does not have any units subject to the Acid Rain regulations.
Title IV – Acid Rain 40 CFR 73	Sulfur Dioxide Allowance Emissions	No	N/A	The facility does not have any units subject to the Acid Rain regulations.
Title IV-Acid Rain 40 CFR 75	Continuous Emissions Monitoring	No	N/A	The facility does not have any units subject to the Acid Rain regulations.
Title IV – Acid Rain 40 CFR 76	Acid Rain Nitrogen Oxides Emission Reduction Program	No	N/A	The facility does not have any units subject to the Acid Rain regulations.
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	No	N/A	The facility does not service, maintain, or repair equipment containing refrigerants.

STATE REGU- LATIONS CITATION	Title	Applies? Enter Yes or No	Unit(s) or Facility	JUSTIFICATION: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.50 NMAC	Oil and Gas Sector – Ozone Precursor Pollutants	Yes	ENG1- ENG9; ENG11- ENG12	This regulation establishes emission standards for volatile organic compounds (VOC) and oxides of nitrogen (NOx) for oil and gas production, processing, compression, and transmission sources. 20.2.50 NMAC subparts: 113 – Engines and Turbines The natural gas-fired spark ignition engines (ENG1-9 and ENG11-12) will comply with applicable requirements of this subpart.
		Yes	FUG	114 – Compressor Seals Each of the eleven reciprocating compressors will comply with applicable wet seal fluid degassing system emissions control requirements and applicable rod packing replacement requirements.
		Yes	FL1-3; VRU1-2	115 – Control Devices and Closed Vent Systems The flares (FL1-3), vapor recovery units (VRU1-2), and associated closed vent systems will comply with applicable requirements of this subpart.
		Yes	FUG	116 – Equipment Leaks and Fugitive Monitoring The piping and equipment components at the facility will comply with applicable audio, visual, and olfactory (AVO) inspections; EPA M21 or optical gas imaging (OGI) inspections; and leak repair and replacement requirements of this subpart.
		No	N/A	117 – Natural Gas Well Liquid Unloading The facility is not a natural gas well; therefore, this subpart is not applicable.
		Yes	DEHY1 -3	118 – Glycol Dehydrators The glycol dehydrators (DEHY1-3) have a PTE of ≥ 2 tpy VOC and are subject to the applicable requirements of this subpart.
		No	HTR1; RB1-3	119 – Heaters The fuel line heater (HTR1) and the glycol regenerator reboilers (RB1-3) are natural gas-fired heaters with a rated heat input < 20 MMBtu/hr; therefore, they are not subject to the requirements of this subpart.
		No	LOAD	120 – Hydrocarbon Liquid Transfers The facility is connected to an oil sales pipeline that is routinely used for hydrocarbon liquid transfers; therefore, this facility is not subject to the requirements of this subpart per 20.2.50.120.A(1) NMAC.
		No	SSM	121 – Pig Launching and Receiving Individual pipeline pig launcher and receiver operations located within the property boundary and under common ownership and control have PTE <1 tpy VOC; therefore, the requirements of this subpart do not apply.
		No	FUG	122 – Pneumatic Controllers and Pumps There are no natural gas-driven pneumatic controllers or pumps at this site; therefore, the requirements of this subpart do not apply.
		Yes	OT1-4	123 – Storage Vessels The oil/condensate storage tanks (OT1-4) will comply with the applicable requirements of this subpart. The skim tanks (SKT1-2) and the produced water tanks (WT1-2) have a VOC PTE less than the applicability thresholds; therefore, the storage vessels are not subject to this subpart
		No	N/A	124 – Well Workovers 125 – Small Business Facilities 126 – Produced Water Management Units 127 – Flowback Vessels & Preproduction Operations The facility is not one of the names sources in these subparts.

Section 14

Operational Plan to Mitigate Emissions

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

Emissions during startup, shutdown, maintenance, and emergencies will be minimized through the site specific Startup, Shutdown, and Malfunction Plan (SSMP) as required by 40 CFR §63.6(e)(3), 20.2.70.300.D.5(g) NMAC, 20.2.72.203.A.5 NMAC, and 20.2.7.14.A NMAC.

Section 15

Alternative Operating Scenarios

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

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

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

XTO is not proposing any alternative operating scenarios.

Section 16

Air Dispersion Modeling

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

What is the purpose of this application?	Enter an X for each purpose that applies
New PSD major source or PSD major modification (20.2.74 NMAC). See #1 above.	
New Minor Source or significant permit revision under 20.2.72 NMAC (20.2.72.219.D NMAC). See #1 above. Note: Neither modeling nor a modeling waiver is required for VOC emissions.	
Reporting existing pollutants that were not previously reported.	
Reporting existing pollutants where the ambient impact is being addressed for the first time.	
Title V application (new, renewal, significant, or minor modification. 20.2.70 NMAC). See #3 above.	X
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. Modeling was approved as part of issuance of NSR Permit 7681-M2 (issued February 11, 2022).

Section 17

Compliance Test History

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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

Compliance Test History Table

Unit Serial No.	Test Description	Test Date
ENG1	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	3/31/21 11/17/21
ENG2	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	3/31/21 11/16/21
ENG3	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	5/18/21 11/16/21
ENG4	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	5/19/21 11/17/21
ENG5	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	5/19/21 11/18/21
ENG6	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	3/31/21 11/18/21
ENG11	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	5/18/21 11/15/21
ENG12	Tested as required by 40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ for NOx, CO, VOC, and HCHO	5/18/21 11/15/21

Section 18

Addendum for Streamline Applications

Do not print this section unless this is a streamline application.

Streamline Applications do not require a complete application. Submit Sections 1-A, 1-B, 1-D, 1-F, 1-G, 2-A, 2-C thru L, Sections 3 thru 8, Section 13, Section 18, Section 22, and Section 23 (Certification). Other sections may be required at the discretion of the Department. 20.2.72.202 NMAC Exemptions do not apply to Streamline sources. 20.2.72.219 NMAC revisions and modifications do not apply to Streamline sources, thus 20.2.72.219 type actions require a complete new application submittal. Please do not print sections of a streamline application that are not required.

This section is not applicable since this is not a Streamline Permit Application.

Section 19

Requirements for Title V Program

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

Who Must Use this Attachment:

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

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

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

The Spartan Compressor Station is not subject to 40 CFR, Part 64, Compliance Assurance Monitoring (CAM); therefore, a monitoring protocol is not required with this application.

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

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

The sources operated at the Spartan Compressor Station currently meet the applicable requirements as detailed in Section 13 of this Title V application.

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

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

The Spartan Compressor Station will continue to be in compliance with applicable requirements for which it is in compliance at the time of this permit application. In addition, the station will, in a timely manner or consistent with such schedule expressly required by the applicable requirement, comply with other applicable requirements as they come into effect during the permit term.

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

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

XTO Energy Inc. requests the Department schedule compliance reporting to start either July 1 or January 1 in order to align with other federal reporting programs. Annual compliance certification is requested to be completed annually for the period January 1 through December 31. If this is not possible, please schedule compliance reporting to match that of NSR Permit 7681-M2.

19.5 - Stratospheric Ozone and Climate Protection

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

-
1. Does your facility have any air conditioners or refrigeration equipment that uses CFCs, HCFCs or other ozone-depleting substances? Yes No
 2. Does any air conditioner(s) or any piece(s) of refrigeration equipment contain a refrigeration charge greater than 50 lbs? Yes No
(If the answer is yes, describe the type of equipment and how many units are at the facility.)
 3. Do your facility personnel maintain, service, repair, or dispose of any motor vehicle air conditioners (MVACs) or appliances ("appliance" and "MVAC" as defined at 82. 152)? Yes No
 4. Cite and describe which Title VI requirements are applicable to your facility (i.e. 40 CFR Part 82, Subpart A through G.)

The station does not produce, manufacture, transform, destroy, import, or export any stratospheric ozone-depleting substances (CFCs, HCFCs); does not maintain or service motor vehicle air conditioning units or refrigeration equipment; and does not sell, distribute, or offer for sale any product that may contain stratospheric ozone-depleting substances.

XTO Energy Inc. shall continue to maintain compliance with the conditions stipulated in 40 CFR 82, Subparts A-G of the Stratospheric Ozone Protection Program (Title VI of the Clean Air Act Amendments).

19.6 - Compliance Plan and Schedule

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

A. Description of Compliance Status: (20.2.70.300.D.11.a NMAC)

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

B. Compliance plan: (20.2.70.300.D.11.B NMAC)

A narrative description of the means by which your facility will achieve compliance with applicable requirements with which it is not in compliance at the time you submit your permit application package.

C. Compliance schedule: (20.2.70.300D.11.c NMAC)

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

D. Schedule of Certified Progress Reports: (20.2.70.300.D.11.d NMAC)

A proposed schedule for submission to the department of certified progress reports must also be included in the compliance schedule. The proposed schedule must call for these reports to be submitted at least every six (6) months.

E. Acid Rain Sources: (20.2.70.300.D.11.e NMAC)

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

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

The Spartan Compressor Station is in compliance with all applicable requirements; consequently, a compliance plan, a compliance schedule, and a schedule of certified progress reports is not required.

The Spartan Compressor Station is not equipped with any acid rain sources; consequently, compliance with the acid rain provisions is not required as a part of this permit application.

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

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

The Spartan Compressor Station is not subject to 40 CFR 68, Chemical Accident Prevention Provisions; consequently, a Risk Management Plan (RMP) is not required.

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

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

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

Texas (13.0 kilometers).

19.9 - Responsible Official

See Section 1-H of this permit application.

Section 20

Other Relevant Information

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

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

No other relevant information is provided.

Section 21

Addendum for Landfill Applications

Do not print this section unless this is a landfill application.

Landfill Applications are not required to complete Sections 1-C Input Capacity and Production Rate, 1-E Operating Schedule, 17 Compliance Test History, and 18 Streamline Applications. Section 12 – PSD Applicability is required only for Landfills with Gas Collection and Control Systems and/or landfills with other non-fugitive stationary sources of air emissions such as engines, turbines, boilers, heaters. All other Sections of the Universal Application Form are required.

EPA Background Information for MSW Landfill Air Quality Regulations:

<https://www3.epa.gov/airtoxics/landfill/landflpg.html>

NM Solid Waste Bureau Website: <https://www.env.nm.gov/swb/>

This is not applicable.

Section 22: Certification

Company Name: XTO Energy Inc.

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

Signed this ___ day of _____, 2022, upon my oath or affirmation, before a notary of the State of

Texas.

*Signature

Date

David Scott
Printed Name

General Manager Permian Delaware BU
Title

Scribed and sworn before me on this ___ day of _____, _____.

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

_____ day of _____, _____.

Notary's Signature

Date

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.