

# **Attachment C5**

**HARVEST FOUR CORNERS, LLC LOS MESTENIOS  
QUESTIONS REMAINING**

1. Harvest has stated that the concentration of the condensate has changed, and these specific changes have decreased the flash emissions from the condensate tanks that would result in an overall emission limit decrease. However, substantiation of such changes to throughput and complete characterization changes needs to be a part of the permit application. Data that is provided should match up to contracts currently in place vs historically in place, or onsite characterization efforts need to match up with historical vs current data analyses for all streams coming into the facility at specified throughput rates.

**Harvest's response on April 17 stated the following:**

- ***“There are no contracts for the amount of material that can be transferred to the facility. The facility is limited on how much material it can process by the compression capability of the site, which is limited to the single Solar turbine. With the current facility configuration, it can compress approximately 20 MMscf/day (see Los Mestenos Maximum Facility Throughput). Harvest cannot increase this capacity without construction that would need to be approved through the NSR program.*”**
- ***Harvest has put together the facility condensate throughput data from 2017 – 2022. The maximum 12-month rolling total at the facility over the last 5 years occurred in 2017 and was 9,109 bbls. The most recent 12-month rolling total was 4,181 bbls. The emissions model was run at a worst-case emissions scenario of 22,141 bbls. There are no plans to make any changes to the site that would increase the facility throughput above what the model was ran at. Any increase in throughput above the model inputs presented in the application would need to be approved by the EPA through the NSR program.”***

EPA request that Harvest use the worst-case condensate sample analysis results over the 5-year time limit of the Los Mestenos Part 71 permit to calculate working and breathing losses and the flash emissions for the new TV application. Also, revise all PTE calculations that utilize the condensate sample analysis to worst case scenario.

2. In Harvest's response on August 17, the 2020 condensate sample analysis results for 2020 was not include. If possible, provide the 2020 condensate analysis results, if not please provide an explanation on why and what analysis was used for the Part 71 TV emission fee calculations for that year.
3. In Harvest's response on August 17, revisions were made to the project scope and facility's process equipment, make these changes are included in the new application.
4. Los Mestenos needs to clarify in the new application if the condensate sample analysis is being used to calculate flash emission using VMGSYm for the pigging activities. If the condensate sample analysis was not used for the calculation of the flash emissions for the pigging activity, what sample is used and explain why. The worst-case sample analysis results during the 5-year term of the permit should be used here as well.
5. There is a notification on EPA's website concerning the use of Tanks 4.09d. The TANKS model was developed using a software that is now outdated. EPA no longer supports the

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use of Tanks 4.09d. Why is Harvest using an outdated method to calculate working and breathing losses of the tanks? Why is Harvest not using the same software to calculate working and breathing losses and the flash emissions?

6. Explain the use of emission factors from Colorado, meteorological data from Colorado, etc. instead of New Mexico
7. Is there recordkeeping to confirm the pigging activities number of events per week.
8. Is there more recent guidance for produced water emission factor than the 2010 TCEQ guidance. Also, why use TCEQ guidance instead of NMED, i.e., information specific to area where facility is located.
9. Harvest still has not provided an explanation on the “refinements” of VMGSym inputs. Is Harvest referring to improvements to the model used? Is this version of the model simulator a new version? Is there an advantage using VMGSym for flash emissions compared to other tank emission calculation models on the market? What are the reasons this model was chosen to calculate tank emissions for this facility?
- 10. Harvest Los Mestenios should revise the submitted process flow diagram to not include equipment that is out of service or decommissioned, and also submit documentation that this equipment is no longer an option for the facility. Usually when an operator has decommissioned equipment and wants to prove emission reductions, EPA requires proof that the supposedly decommissioned units are disconnected from the process and, if still on site, unable to be connected back up to the process and become emission units without significant reconstruction, requiring first evaluation for necessary pre-construction permitting. In fact, unless equipment has been removed from the site, we do not consider it “decommissioned,” but rather disconnected from the process and no longer an emission unit. To prove Harvest could provide photos of the disconnection (e.g., piping removed and blind flanged) and a project work order (or equivalent), *accompanied by a signed statement by the person responsible for CAA compliance.***
11. Include a copies of Los Mestenios certified TV fee payment for the 5-year term of the permit and fee calculation worksheets in the new application.
12. All information presented in the new application which includes but not limited to the process flow diagrams and process description, methodology, equations, assumptions, emission factors used for the emissions calculation should allow for the public to follow and understand
13. The methodology used to calculate emissions and facility PTE should be included in the new application