

# **Attachment C1**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1201 ELM STREET, SUITE 500  
DALLAS, TEXAS 75270

April 5, 2022

Mr. Oakley Hayes  
Harvest Four Corners, LLC  
1755 Arroyo Drive  
Bloomfield, New Mexico 87413

Re: Incomplete Application Determination, Part 71 Permit Renewal for Harvest Four Corners, LLC Los Mestenos Compressor Station Facility, Permit Number R6FOP-NM-04-R2.

Mr. Hayes:

Harvest Four Corners, LLC (Harvest) submitted a title V renewal application for the Los Mestenos Compressor Station (Facility) on February 4, 2022. The existing Facility is located within the boundaries of the Jicarilla Apache Tribal Reservation located in Rio Arriba County, New Mexico. EPA finds that the title V permit application is incomplete according to 40 CFR§ 71.7(a)(4).

Harvest will need to provide the following supplemental information for us to proceed with processing the title V permit application: complete up-to-date process and operational flow diagram, text description of current operations that delineate any and all changes in equipment or operations since the last permit issued, and most importantly any operating and emissions data collected in accordance with the current title V permit that can be used to *substantiate changes in the PTE calculations* for the permit renewal. For example, we need to understand the basis for the reduction in flash emissions from the condensate storage tank due to a change in the condensate composition or well of origin, and finally, all modeling inputs, including changes from prior modeling conducted which was the basis of the original permit. Please delineate specific improvements in using the VMGSym and how any changes from prior modeling efforts result in emissions estimates today.

Although Harvest also submitted a notification letter to our office requesting a change from a major title V source on January 21, 2022, the submission wasn't acceptable due to the lack of information provided. Since the Facility's current title V permit R6FOP-04-R2 is due to expire on August 8, 2022, the Facility may only continue to operate under the terms established under the permit based upon the Facility submitting "a timely and complete permit renewal application ... at least six months ... prior to the expiration" of the title V permit. Therefore, EPA informed Harvest<sup>1</sup> that for the title V permit renewal application to be reviewed and found complete, Harvest needed to submit a title V permit application prior to February 7, 2022 (the six-month mark prior to permit expiration referenced in regulations and the current permit).

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<sup>1</sup> EPA e-mail from Erica LeDoux (EPA permit writer) to Oakley Hayes (Harvest Midstream) on January 28, 2022, advised the Facility that until further evaluation of the "change of status" submission, EPA must consider the Facility to be an existing TV source.

EPA has completed a preliminary review of all information submitted to date, and have determined that we need the same additional information to grant a change of status for the Facility and to determine what permit type is needed for the Facility, as being requested for the TV permit renewal. In the upcoming week EPA may also provide a list of specific questions we have for the submitted permit applications since a meeting may help facilitate our understanding of your emission estimates. Please contact Erica Le Doux at [ledoux.ERICA@epa.gov](mailto:ledoux.ERICA@epa.gov) or at 214-665-7265 if you have any questions.

Sincerely,

**CYNTHIA  
KALERI**

Cynthia J. Kaleri  
Air Permits Section Chief

Digitally signed by CYNTHIA KALERI  
DN: c=US, o=U.S. Government,  
ou=Environmental Protection Agency,  
cn=CYNTHIA KALERI,  
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cc: James Newby, Cirrus Consulting, LLC