

Attachment C2



PO Box 61229
Houston, TX 77208

1111 Travis Street
Houston, TX 77002
Phone: 713/209-2400
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harvestmidstream.com

April 14, 2022

Cynthia Kaleri
US EPA – Region 6
Air Permits Section Chief
1201 Elm Street, Suite 500
Dallas, Texas 75270

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

Dear Madam/Sir,

In response to your letter, dated April 5, 2022, requesting additional information for the Los Mestenos Title V renewal application, Harvest Four Corners, LLC (Harvest) provides the following.

In addition to the flow diagram provided in the Title V application, you requested a “complete up-to-date process and operational flow diagram”. Please see the attached flow diagram.

In response to your request for a “text description of current operations that delineate any and all changes in equipment and operations since the last permit issued”, we refer you to the Introduction on Page 7 of the application. It identifies the currently permitted equipment and all past/proposed changes since the last permit. Note that Harvest purchased the facility from Williams Four Corners LLC in 2018. We cannot speak to changes that may have taken place prior to purchase of the facility. However, comparing the current permit with existing equipment and operations, we are not aware of any other changes.

In response to your request for “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”, we refer you to the Section 3 of the application (Emission Calculations and Documentation). It shows that replacement of the Caterpillar engine (Unit 2) reduces facility total NOx emissions to approximately 40 tons per year. It also provides documentation showing that facility total VOC emissions have been reduced to approximately 91 tons per year. This reduction occurs because there has been a significant decrease in the propane and butane composition of the condensate since 2017, 4.83 and 3.10 mole percent, respectively. Propane and butane make up a majority of the flash emissions. Please see the attached 2017 and 2021 condensate analyses.

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Cynthia Kaleri
April 14, 2022
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Since Harvest did not own or operate the facility when the last Title V renewal application was submitted, other than what was provided in the last Title V renewal application, we do not have access to the previous modeling, including wells of origin and model inputs. We can state, however, that the inputs used in the recently submitted VMGSym analysis (pages 93-97 of the application) represent conditions at the station currently and going forward.

Thank you for your help with the application. Please contact us if you have any other questions.

Sincerely,



Oakley Hayes
Environmental Specialist
Harvest Four Corners, LLC
1755 Arroyo Drive
Bloomfield, NM 87413

cc: James Newby, Cirrus Consulting, LLC

Attachments:

Flow Diagram
2017 & 2021 Condensate Analyses

LOS-VR-1011
8" PIG RECEIVER

LOS-H-1013
LIQUIDS RECEIVER

LOS-H-1014
12" PIG LAUNCHER

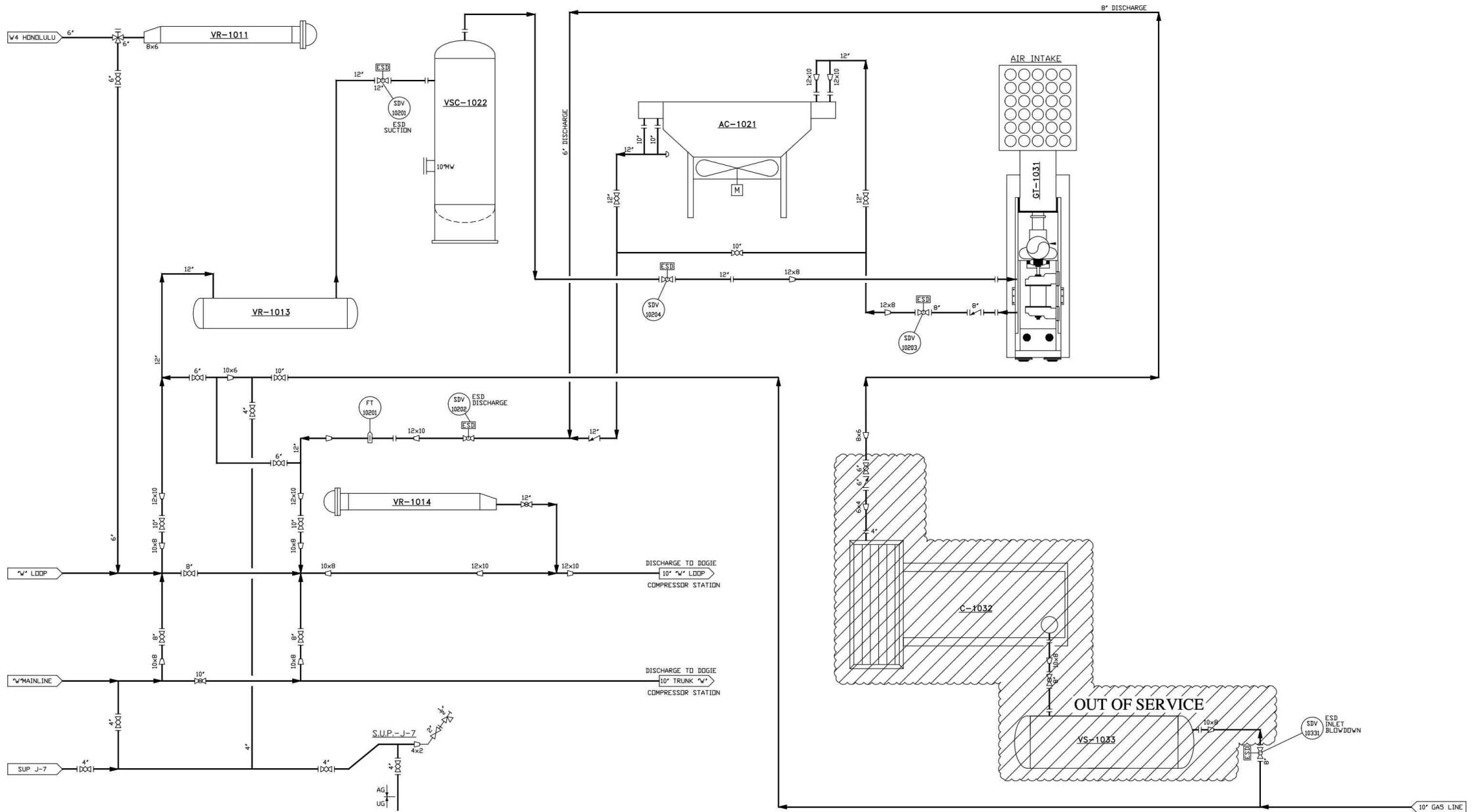
LOS-VSC-1022
INLET SUCTION SCRUBBER

LOS-AC-1021
DISCHARGE COOLER

LOS-GT-1031
GAS TURBINE COMPRESSOR
SOLAR SATURN
1200 HP

LOS-C-1032
COMPRESSOR
CATEPILLAR
G300TA

LOS-VS-1033
INLET SEPARATOR



NOTES:

REVISED
 4/11/2022
DESTROY ALL PREVIOUS REVISIONS

REV	DRAWN BY	DATE REVISION	CHECKED BY	PROJECT ENG.	APPROVED BY
2	T. GOOSSEN	4/13/2021	C.W.		
1	T. GOOSSEN	4/11/2022			
0	BL	2/20/10			

REV	DRAWN BY	DATE REVISION	CHECKED BY	PROJECT ENG.	APPROVED BY
2	T. GOOSSEN	4/13/2021	C.W.		
1	T. GOOSSEN	4/11/2022			
0	BL	2/20/10			

		H4C Office 1755 Arroyo Drive Bloomfield, NM 87413	
		LOS MESTENIOS COMPRESSOR STATION PROCESS FLOW DIAGRAM	
RIO ARRIBA COUNTY		SCALE: NONE	A.F.E.: N/A
DRAWN BY: BL		PROJECT ENG.:	
CHECKED BY:		APPROVED BY:	
DATE ISSUED: 5/20/10		LOS-P02-001	

REFERENCE DRAWINGS

REVISIONS



Certificate of Analysis
 Number: 1030-17120736-001A

Houston Laboratories
 8820 Interchange Drive
 Houston, TX 77054
 Phone 713-660-0901

Environmental Department
 Williams
 1755 Arroyo Drive
 Bloomfield, NM 87402

Jan. 02, 2018

Station Name: Los Mestinos Comp Station
 Method: GPA 2103M
 Cylinder No: CP9A
 Analyzed: 12/20/2017 06:29:58 by RR

Sampled By:
 Sample Of: Liquid Spot
 Sample Date: 12/18/2017 10:00
 Sample Conditions: 100 psig
 PO/Ref. No: 651377

Analytical Data

Components	Mol. %	MW	Wt. %	Sp. Gravity	L.V. %
Nitrogen	NIL	NIL	NIL	NIL	NIL
Methane	1.691	16.043	0.316	0.300	0.730
Carbon Dioxide	0.080	44.010	0.041	0.817	0.035
Ethane	2.543	30.069	0.891	0.356	1.730
Propane	5.386	44.096	2.767	0.507	3.776
Iso-Butane	2.568	58.122	1.739	0.563	2.138
n-Butane	6.605	58.122	4.473	0.584	5.299
Iso-Pentane	6.228	72.149	5.235	0.625	5.796
n-Pentane	6.629	72.149	5.572	0.631	6.115
i-Hexanes	8.172	84.640	8.059	0.669	8.342
n-Hexane	6.135	86.175	6.160	0.664	6.420
2,2,4-Trimethylpentane	0.101	114.229	0.135	0.696	0.134
Benzene	1.300	78.112	1.183	0.884	0.926
Heptanes	23.110	93.750	25.244	0.724	24.149
Toluene	3.832	92.138	4.114	0.872	3.266
Octanes	16.952	106.079	20.950	0.749	19.363
Ethylbenzene	0.231	106.165	0.286	0.872	0.227
Xylenes	1.808	106.165	2.237	0.870	1.780
Nonanes	3.122	123.362	4.484	0.753	4.119
Decanes Plus	3.507	149.683	6.114	0.748	5.655
	100.000		100.000		100.000

Calculated Physical Properties	Total	C10+
Specific Gravity at 60°F	0.6921	0.7484
API Gravity at 60°F	72.943	57.570
Molecular Weight	85.832	149.683
Pounds per Gallon (in Vacuum)	5.770	6.239
Pounds per Gallon (in Air)	5.764	6.233
Cu. Ft. Vapor per Gallon @ 14.696 psia	25.512	15.819

Hydrocarbon Laboratory Manager

Quality Assurance:

The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.



Certificate of Analysis
 Number: 1030-17120736-001A

Houston Laboratories
 8820 Interchange Drive
 Houston, TX 77054
 Phone 713-660-0901

Environmental Department
 Williams
 1755 Arroyo Drive
 Bloomfield, NM 87402

Jan. 02, 2018

Station Name: Los Mestinos Comp Station
 PO/Ref. No: 651377
 Cylinder No: CP9A

Sampled By:
 Sample Of: Liquid Spot
 Sample Date: 12/18/2017 10:00
 Sample Conditions: 100 psig

Analytical Data

Test	Method	Result	Units	Detection Limit	Lab Tech.	Analysis Date
Shrinkage Factor	Proprietary	0.9349			SM	12/27/2017
Flash Factor	Proprietary	86.4702	Cu.Ft./STBbl.		SM	12/27/2017
Color Visual	Proprietary	Straw			SM	12/27/2017
API Gravity @ 60° F	ASTM D-4052	67.73	°		EV	12/28/2017

Hydrocarbon Laboratory Manager

Quality Assurance:

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Client	Harvest Midstream	15297-01	
Sample Id.	Los Mestinos Compressor Station	Sample Pressure (psig)	70
Sample Source	Slug Receiver	Sample Temp. (°F)	66
Sample Type	Spot	Atm Temp. (°F)	64
Meter #	N/A	Sample Date	8/30/2021
Sampled By	C.L.	Report Date	9/29/2021
		Analysis By	A.K.

	<u>Mol %</u>	<u>Vol. %</u>	<u>Wt. %</u>
Nitrogen	0.1210	0.0296	0.0324
Methane	4.9708	1.8718	0.7630
Carbon Dioxide	0.0114	0.0044	0.0048
Hydrogen sulfide	0.0000	0.0000	0.0000
Ethane	1.0154	0.6034	0.2922
Propane	0.5571	0.3411	0.2351
I-Butane	1.6368	1.1903	0.9103
n-Butane	4.4332	3.1059	2.4656
I-Pentane	5.2322	4.2526	3.6122
n-Pentane	4.6228	3.7240	3.1915
Cyclopentane	0.0453	0.0299	0.0304
I-Hexanes	2.2595	2.0996	1.8633
n-Hexane	4.4582	4.1055	3.6764
Methylcyclohexane	8.7330	7.8421	8.2052
2,2,4 Trimethylpentane	0.2886	0.3360	0.3155
Benzene	1.0964	0.6861	0.8194
Cyclohexane	3.9261	2.9869	3.1618
I-Heptanes	5.4398	5.6035	5.2157
n-Heptane	5.7003	5.8821	5.4655
Toluene	0.4178	0.3127	0.3684
I-Octanes	4.9798	5.6177	5.4432
n-Octane	4.3311	4.9558	4.7341
Ethylbenzene	0.4476	0.3859	0.4547
m+P Xylenes	2.1406	1.8521	2.1744
o-Xylene	0.9646	0.8194	0.9798
I-Nonanes	0.9458	1.2070	1.1607
n-Nonane	4.2848	5.3052	5.1760
I-Decanes	0.2432	0.3477	0.3312
Decanes Plus	17.0309	26.4193	30.0019

SCF/Gal (C1-C5 Vapor)	5.0419	Molecular Weight	104.5055
Specific Gravity	0.7359	Vapor Pressure (psia)	263.73
		Specific Gravity (C10+ Fraction)	0.8340
		Molecular Weight (C10+ Fraction)	183.5104

615 North Price Road Pampa, Texas 79065 (806) 665-0750