

# **Attachment A**



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

October 31, 2022

Emily C. Schilling  
Partner  
Holland & Hart  
222 South Main Street, Suite 2200  
Salt Lake City, Utah 84101

Re: Part 71 Title V Permit Renewal Application for Harvest Four Corners, LLC (Harvest) Los Mestenos Compressor Station located in Rio Arriba County, New Mexico on Jicarilla Apache Nation Tribal Lands.

Dear Ms. Schilling:

This letter is to inform Harvest that the United States Environmental Protection Agency is rescinding its incompleteness determination of the title V renewal application for the Los Mestenos Compressor Station (Facility) dated April 5, 2022. This decision is based on Harvest adequately clarifying some outstanding questions and the company's commitment moving forward to provide the remaining information that will be required to process the Facility's title V renewal permit. This decision, by default, also rescinds a previous letter sent September 8, 2022, to inform Harvest of EPA's position that Harvest would be required to submit an initial title V permit application if the company still wanted to pursue a title V permit. For reasons stated above, even though the Facility's existing title V permit expired on August 8, 2022, the Facility's application shield is thus established for Permit Number R6FOP-NM-04-R2 in accordance with §§ 71.5(a)(2) and 71.7(b).

EPA appreciates the information shared in our meeting with Harvest on October 24, 2022, to discuss the permit status of the Facility. This meeting allowed Harvest to clarify the standing questions that had led to our incompleteness determination of the Facility's title V renewal application submittal received on February 4, 2022. During the meeting Harvest articulated its commitment to EPA toward resolving and providing responses to key questions related specifically to how the Facility's potential to emit (PTE) is calculated. EPA communicated its intention to work collaboratively with Harvest processing the information that will be submitted in future permit application submittals.

As a result of the revised PTE calculations presented during the meeting, Harvest may submit a synthetic minor New Source Review (NSR) permit application which includes proposed emission limits to stay below major source threshold levels or Harvest will submit a revised title V renewal application for the Facility. EPA recommends combining all information previously submitted in various submittals into one concise permit application for either permit type that contains an accurate representation of current Facility equipment and operations that can be referenced in development of the permit for public comment. This includes answers to all questions presented at the meeting: 1) the revised Facility's PTE calculations using worst case scenario of the condensate analysis over the 5-year term of the title V permit; 2) the pigging activity emission calculations including an example calculation that aligns with an actual description of the activity as conducted at the Facility; 3) an explanation of how VOC emissions

are calculated using the well gas analysis for all the emission units that this analysis is used for and a calculation that demonstrates this description; 4) the complete characterization of the inputs and outputs to the VMGSym software used to calculate flash emissions and explanation why the model is being used separate of another model used for working and breathing losses from tanks – specifically explain how the different models, i.e., VMGSym and the outdated Tanks 4.09d, used together provide more accurate emission estimates for tank emissions instead of a single model like either VMGSym or TankESP that would account for all three types of emissions; 5) include the methodology/equations used to calculate the emissions for each emission unit with an example calculation of how the methodology is used; 6) the Excel spreadsheets used to calculate the Facility emissions. In order to expedite the processing of your permit application, please provide us your application no later than December 1, 2022.

If you have any specific questions please contact the permit engineer for the project Erica Le Doux of my staff, at [ledoux.ERICA@epa.gov](mailto:ledoux.ERICA@epa.gov).

Sincerely,

**DAVID**  
**GARCIA**



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by DAVID GARCIA  
Date: 2022.10.31  
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David F. Garcia, P.E.  
Director  
Air and Radiation Division

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