

8P - AR
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BP America Production Company
San Juan North Asset
380 Airport Road
Durango, CO 81303

January 16, 2006

Ms. Kathleen Paser, Permit Engineer Part 71
U.S. E.P.A. Region 8 Air & Radiation (8P-AR)
999 18th Street, Suite #300
Denver, CO 80202-2466

RE: BP America Production Company - NA Gas SPU North Business Unit
San Juan North Asset: Florida River Compression Facility
Title V Renewal: Permit No. V-SU-0022.00.04

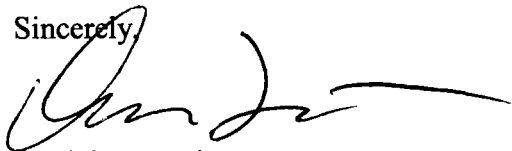
Dear Ms. Paser:

BP America Production Company (BP) is submitting additional information for the Title V Renewal Application for the Florida River Compression Facility as requested in the December 21, 2005 email from EPA's Deirdre Rothery to BP's Julie Best.

Please note that the formaldehyde potential to emit calculations for the twelve diesel-fired electric generating engines are based on AP-42 emission factors. BP requested manufacturer formaldehyde emission factors from Cummins for these units, but they were unable to provide data. Therefore, AP-42 emission factors are the best available formaldehyde emission factors for the diesel engines at this time.

Please call me at (970) 247-6913 if you have any questions concerning this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Fauth".

Daniel P. Fauth

P.E.; Environmental Coordinator

BP America Production Company

cc: Ethan Hinkley, SUIT Environmental Programs - Division Head;
Julie Best, BP Houston

EPA FL-0010

**FLORIDA RIVER COMPRESSION FACILITY
JANUARY 2006 ADDITIONAL INFORMATION**

Corrected Form GIS

Form EUD for Plant Flare

Form EMISS

Form CTAC

U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71
APPLICATION FORM GIS - GENERAL INFORMATION AND SUMMARY

Instructions: Complete this form once for the part 71 source (facility).

A. Mailing Address and Contact Information

Facility name Florida River Compression Facility

Plant Contact

Mailing address: Street or P.O. Box 2906 CR 307

City Durango State CO ZIP 81303 - _____

Contact person: Daniel P. Fauth Title Environmental Coordinator

Telephone (970) 247 - 6913 Ext. _____ Facsimile (970) 247 - 6910

Company Contact

Mailing address: Street or P.O. Box 501 Westlake Park Blvd., M/S 2.170

City Houston State TX ZIP 77079 - _____

Contact person: Julie A. Best Title Environmental Specialist

Telephone (281) 366 - 0405 Ext. _____ Facsimile (281) 366 - 7945

B. Facility Location

Temporary source? Yes No Plant site location Section 25, Township 34 N, Range 9 W

City 10 miles SE of Durango State CO County La Plata EPA Region 8

Is the facility located within:

Indian lands? YES NO OCS waters? YES NO

Nonattainment area? YES NO If yes, for what air pollutants? _____

Within 50 miles of affected State? YES NO If yes, What State(s)? Southern Ute Reservation, NM

C. Owner

Name BP America Production Company Street/ P.O. Box 501 Westlake Park Blvd.

City Houston State TX ZIP 77079 - _____

Telephone (281) 366 - 2000 Ext. _____

D. Operator

Name BP America Production Company Street/ P.O. Box 501 Westlake Park Blvd.

City Houston State TX ZIP 77079 - _____

Telephone (281) 366 - 2000 Ext. _____

E. Application Type

Instructions: Mark only one permit application type and answer the supplementary question appropriate for the type marked.

Initial Permit Permit Renewal Significant Mod. Minor Permit Mod. (MPM)

Group Processing, MPM Administrative Amend.

For initial permits, when did operations commence? ____ / ____ / ____

For permit renewals, what is the expiration date of the existing permit? 06 / 05 / 2006

F. Applicable Requirement Summary

Instructions: Mark all applicable requirements that apply.

SIP FIP/TIP PSD Nonattainment NSR

Minor source NSR Section 111 Phase I acid rain Phase II acid rain

Stratospheric ozone OCS regulations NESHAP Sec. 112(d) MACT*

Sec. 112(g) MACT Early reduction of HAP Sec. 112(j) MACT RMP [Sec.112(r)]

Tank vessel reqt., section 183(f) Section 129 Standards/Reqts.

Consumer/ commercial prod. reqts., section 183(e) NAAQS, increments or visibility (for temporary sources)

Has a risk management plan been registered? YES NO Regulatory agency US EPA Region 8

Has a phase II acid rain application been submitted? YES NO Permitting authority _____

*** This site is not a major source of HAPs.**

MACT HH for Oil & Natural Gas Production- not applicable: The site is not a major source as defined in this Subpart. The site does not have any tanks with the potential for flash emissions and the dehydration units have the potential to emit less than 10/25 tpy HAPs.

MACT ZZZZ for Stationary Reciprocating Internal Combustion Engines- not applicable: The site is not a major source as defined in this Subpart. The site does not have any tanks with the potential for flash emissions and the dehydration units and all engines have the potential to emit less than 10/25 tpy HAPs.

MACT DDDDD for Industrial, Commercial, and Institutional Boilers and Process Heaters- not applicable: The site is not a major source as defined in this Subpart. The site does not have any tanks with the potential for flash emissions and the dehydration units, reboilers, and heaters have the potential to emit less than 10/25 total tpy HAPs.

63.10(b)(3) Recordkeeping requirement for applicability determinations- applicable: The site emits HAPs, has equipment potentially subject to MACT standards, and is not subject to a MACT standard because of an exclusion. This signed permit application serves as the record for the site. Any future changes will be documented and kept with the permit file.

NSPS not properly addressed in the existing Statement of Basis:

NSPS Dc for Small Industrial-Commercial-Institutional Steam Generating Units – not applicable: The amine heaters were both constructed prior to 6-9-89 and have not been reconstructed. Amine Heater 1 was built 5-30-89 and installed in 1990. Amine Heater 2 was constructed in 1980 and installed in 1997. NSPS Dc does not contain definitions of construction, and the EPA online determinations do not include any clarification of construction for this subpart. There is an API Determination for NSPS GG (Turbines) regarding construction, and a copy of the abstract is below. API Determination Control Number 0300006 says that if the source was manufactured before the construction trigger date, the source is not subject to NSPS as long as it is not "modified" or "reconstructed" regardless of purchase date or start-up date. A copy of the determination is included following Form GIS.

NSPS KKK for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants - not applicable: The Florida River Compression Facility is not a natural gas processing plant (i.e., does not extract or fractionate natural gas liquids).

NSPS LLL for Onshore Natural Gas Processing: SO2 Emissions – not applicable: There are two amine units at the site. However, the amine units do not process sour gas. Although "sour natural gas" is not defined in the regulation, the bid document states that sour gas is gas containing greater than 4 ppm H2S. A copy of page 3-3 of EPA's *SO2 Emissions in Natural Gas Production Industry – Background Information for Proposed Standards*. EPA-450/3-82-023a is included following Form GIS.

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

Instructions: Cite and describe (1) any emissions-limiting requirements that apply to the facility as a whole, and (2) "generic" applicable requirements that apply broadly or in an identical fashion to all sources at the facility.

None

H. Process Description

Instructions: List all processes, products, and SIC codes for normal operation, in order of priority. Also list any process, products, and SIC codes associated with any alternative operating scenarios, if different from those listed for normal operation

Process	Products	SIC
Separation, compression, and dehydration of natural gas from coal bed methane wells.	Natural gas	1311

I. Emission Unit Identification

Instructions: Assign an emissions unit ID and describe each significant emissions unit at the facility. Control equipment and/or alternative operating scenarios associated with emissions units should be listed on a separate line. Applicants may exclude from this list any insignificant emissions units or activities.

Emissions Unit ID	Description of Unit
T-1	45 MMBtu/hr Turbine #1, Natural gas-fired turbine, simple cycle, Solar Centaur H T5500
T-2	45 MMBtu/hr Turbine #2, Natural gas-fired turbine, simple cycle, Solar Centaur H T5700
AH-1	44.5 mmBtu/hr Amine Heater #1
AH-2	44.0 mmBtu/hr Amine Heater #2
AV-1	70 MMscfd Amine Unit #1 Vent
Plant Flare	Plant Flare, 4 MMBtu/hr pilot, 0.1 - 400 MMscfd
P-1	2922 hp Diesel-fired electric generation unit, Cummins QSK60
P-2	2922 hp Diesel-fired electric generation unit, Cummins QSK60
P-3	2922 hp Diesel-fired electric generation unit, Cummins QSK60
P-4	2922 hp Diesel-fired electric generation unit, Cummins QSK60
P-5	2922 hp Diesel-fired electric generation unit, Cummins QSK60
P-6	2922 hp Diesel-fired electric generation unit, Cummins QSK60
P-7	2922 hp Diesel-fired electric generation unit, Cummins QSK60
P-8	2922 hp Diesel-fired electric generation unit, Cummins QSK60
P-9	2922 hp Diesel-fired electric generation unit, Cummins QSK60
P-10	2922 hp Diesel-fired electric generation unit, Cummins QSK60
P-11	2922 hp Diesel-fired electric generation unit, Cummins QSK60
P-12	2922 hp Diesel-fired electric generation unit, Cummins QSK60

J. Facility Emissions Summary

Instructions: Enter potential to emit (PTE) for the facility as a whole for each air pollutant listed below. Enter the name of the single HAP emitted in the greatest amount and its PTE. For all pollutants stipulations to major source status may be indicated by entering "major" in the space for PTE. Indicate the total actual emissions for fee purposes for the facility in the space provided. Applications for permit modifications need not include actual emissions information

NOx 282.07 tons/yr VOC 30.27 tons/yr SO2 24.23 tons/yr
PM-10 7.95 tons/yr CO 181.94 tons/yr Lead _____ tons/yr
HAPs 4.14 tons/yr

Which single HAP emitted in the greatest amount? CH2O PTE? 1.20 tons/yr

Insignificant activities are listed on Form IE and emissions are listed in the Insignificant Emissions Summary. These emissions are not included in the major source determination.

Total emissions of regulated pollutants (for fee calculation) from section F, line 5 of form FEE? _____*_____ tons/yr

***Note: Fees are paid annually in accordance with the current permit. Since this is a renewal application, Form FEE is not required.**

K. Existing Federally Enforceable Permits:

Permit number(s) V-SU-0022.00.04 Permit type Title V Operating Permit Permitting authority EPA
P-1 through P-12 engines have a cumulative NOx limit of 39.1 tpy.

Permit number(s) _____ Permit type _____ Permitting authority _____

L. Emission Unit(s) Covered by General Permits

Emission unit(s) subject to general permit None

Check one: Application made Coverage granted

General permit identifier _____ Expiration Date / /

M. Cross-referenced Information

Does this application cross-reference information? YES NO (If yes, see instructions)

U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

APPLICATION FORM EUD-1 - EMISSIONS UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES

INSTRUCTIONS: Complete this form for each significant emissions unit best described as a fuel combusting unit.

A. General Information

Emissions unit ID Plant Flare Description Plant Flare, 4 MMBtu/hr pilot, 0.1 - 400 MMscfd

SIC Code (4-digit) 1311 SCC Code* 31000205

* Does not impact regulatory applicability.

B. Emissions Unit Description - See Section E. Air Pollution Control Equipment

Primary use _____ Temporary source Yes No Manufacturer _____

Model _____ Serial Number _____ Installation date ___/___/___

Boiler type Industrial boiler Process burner Electric utility boiler Other (describe) _____

Boiler horsepower rating _____ Boiler steam flow (lb/hr) _____

Type of fuel burning equipment (coal burning only):

- | | | |
|--|--|---|
| <input type="checkbox"/> Hand fired | <input type="checkbox"/> Spreader stoker | <input type="checkbox"/> Underfeed stoker |
| <input type="checkbox"/> Overfeed stoker | <input type="checkbox"/> Traveling grate | <input type="checkbox"/> Shaking grate |
| <input type="checkbox"/> Pulverized, wet bed | <input type="checkbox"/> Pulverized, dry bed | |

Actual (average) heat input _____ MM BTU/hr Maximum design heat input _____ MM BTU/hr

C. Fuel Data - Pilot Gas

Instructions: Describe each fuel expected to be used during the term of the permit.

Primary fuel type(s) natural gas Standby fuel type(s) none

Fuel Type (e.g., natural gas, oil, coal, etc.)	Max Sulfur (%)	Max Ash (%)	BTU Value (per cf, gal or lb)
Natural gas	Non detectable (1 ppm H2S)	Not applicable	800-1000 BTU/scf

D. Fuel Usage Rates - Pilot Gas

Instructions: For each fuel described above, enter actual and maximum fuel usage rates on a worst-case hourly and annual basis. Indicate the dimension for the fuel usage rate (e.g., gallons, cords, cubic feet).

Fuel Type (e.g., natural gas, oil, coal, etc.)	Annual Actual Usage	Maximum Usage*	
		Hourly	Annual
Natural gas		4157 scf/hr	36 MMscf/yr
		* This is fuel gas only.	

E. Air Pollution Control Equipment

Emissions unit ID Plant Flare Device type Flare Air pollutant(s) controlled VOC*

Manufacturer VECO Model No. Custom Ground Flare Serial No. _____

Installation date 01/2004 Control efficiency (%) 98% Efficiency estimation method design

* The flare system disposes of a minimum of about 100,000 scf per day but is designed to handle the full inlet for a very brief period in emergency or plant upset situations.

F. Ambient Impact Assessment Information- N/A

Instructions: This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit.

Stack height (ft) _____ Inside stack diameter (ft) _____ Stack temp(°F) _____

Design stack flow rate (ACFM) _____ Actual stack flow rate (ACFM) _____ Velocity (ft/sec) _____

U.S. ENVIRONMENTAL PROTECTION AGENCY
 APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

FORM EMISS - EMISSIONS CALCULATIONS

INSTRUCTIONS: Use this form to calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID Plant Flare

B. Identification and Quantification of Emissions

Instructions: First, list each air pollutant that is either regulated at the unit or present in major amounts. Second, list any other regulated pollutant (for fee calculation) emitted at the unit that have not already been listed. Each HAP added to the list in this step may be simply listed as "HAP". Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each listed air pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives, including those that do not count towards applicability, when calculating actual emissions. At a minimum, round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values. Attach examples of calculations that illustrates the methodology used.

Air Pollutants (including regulated air pollutants and pollutants for which the source is major)	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit *		
		Hourly (lb/hr)	Annual (tons/yr)	
NOx		0.5447	2.3856	
CO		2.9636	12.9806	
VOC		0.0016	0.0071	
SO2		0.0015	0.0065	

* Emissions estimate only. These are not allowable limits.

U.S. ENVIRONMENTAL PROTECTION AGENCY
APPLICATION FOR FEDERAL OPERATING PERMIT, 40 CFR PART 71

APPLICATION FORM CTAC - CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS BY RESPONSIBLE OFFICIAL

Florida River Compression Facility January 2006 Additional Information for Title V Renewal Application

INSTRUCTIONS: One copy of this form must be completed, signed, and sent with each submission of documents (i.e., application forms, including any updates to applications), and for every document required by a part 71 permit (e.g., annual compliance certification, 6-month monitoring reports, progress reports, and notices required by the terms of a part 71 permit).

Responsible Official. Identify the responsible official and provide contact information.

Name: (Last) Page (First) Stan (Middle) G.

Title Florida Operations Manager

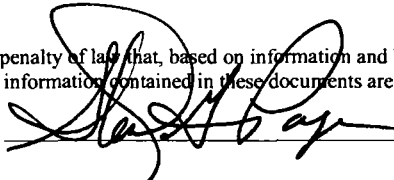
Street or Post Office Box 2906 C.R. 307

City Durango State CO ZIP 81303

Telephone (970) 247 - 6901 Ext. _____ Facsimile (970) 247 - 6910

Certification of Truth, Accuracy and Completeness. The Responsible Official must sign this statement.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed)  _____

Name (printed or typed) Stan G. Page Date: 01 / 13 / 06