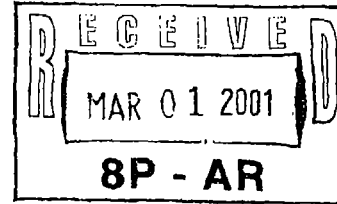




BP America, Inc.
Durango Operations Center
380 Airport Rd.
Durango, CO 81303

February 28, 2001

Colorado Department of Public Health and Environment
Air Pollution Control Division
OED-OPPI-A5
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530
Attention: Mr. Jim King



RE: Annual and Semi-Annual Certification Report; Florida River Compression Facility; Operating Permit No. 95OPLP004; La Plata County, Colorado

Dear Mr. King:

Please find attached the annual and semi-annual compliance certification for the turbines located at the subject compression facility. As you know, Amoco has assumed Title V compliance for the turbines from El Paso Natural Gas and is now submitting the certification. Attached are the annual and semi-annual certifications for the turbines located at Florida River Facility.

You should also be aware that we have filed a Title V Part 71 application with the EPA for the Florida River Facility. The application aggregates emissions of both the El Paso turbines and the Amoco equipment, since Amoco is now responsible for the turbines. Once the Part 71 permit has been issued, we will notify the Air Pollution Control Division to cancel both the Part 70 Title V permit for the turbines and the minor permits for the Amoco sources.

Should there be any additional questions, please feel free to contact me at (970) 247-6815.

Sincerely,

Kourtney Williams
Environmental Coordinator

cc: Environmental Protection Agency
Region 8
999 18th Street
Denver, CO 80202
Attn: Ms. Cathleen Passer

EXHIBIT D

Colorado Department of Health
Air Pollution Control Division
INTER-OFFICE COMMUNICATION

TO: Dick Fox

DATE: February 28, 1989

FROM: Bob Jorgenson

SUBJECT: Final Approval Inspection
Amoco Production Company,
Salvador, Mayfield, Tiffany
Lemon, Southern Ute
Compressor Stations, Permit
Number 88LP048
(1,2,3,5,6,7,8,9,10)

On February 15 and 16, 1989 I inspected these Amoco Production Company compressor stations in La Plata County: Salvador, Mayfield, Tiffany, Lemon, Southern Ute. The County number is 1300; the source numbers are as follows:

Salvador 88LP048 (1 and 2) Source #32 This site consists of two Ajax compressors, 88LP048 (1) T-DPC 180 horsepower, Serial #77021 and 1-88LP048 (2), 1 DPC 280 horsepower, Serial #81112.

The permit conditions are virtually the same for each permit. Compliance is listed below:

1. No visible emissions were observed during my inspections.
2. The permit number was marked on the engines.
3. The serial numbers are listed above.
4. The engines are in compliance with the emission limits as best as could be determined.
5. In compliance.
6. No odors were observed during my inspections.
7. Construction is completed.

Final approval is recommended for these two permits.

Mayfield 88LP048 (3) Source #33

This site consists of a Caterpillar 415 horsepower engine with the following two numbers: Serial #72B01011 and AR #3N3371

There apparently is a discrepancy in the horsepower of this engine. The permit lists the horsepower as 300. I asked Dave Brown to confirm the horsepower prior to final approval. Permit condition compliance is listed below:

EXHIBIT E

Memorandum to
Dick Fox
February 28, 1989
Page Two

1. No visible emissions were observed.
2. The permit number was marked on the engine.
3. The serial numbers are listed above.
4. The engines are in compliance with the emission limits as best as could be determined.
5. In compliance.
6. No odors were observed.
7. Construction is completed.

Final approval is recommended as soon as the horsepower discrepancy is cleared up.

Tiffany 88LP048 (5 and 6) Source #35

This site has two engines 88LP048 (5) one Ajax DCP-360 horsepower serial #80754, 88LP048 (6) one Ajax DCP 800 horsepower serial #82576.

The permit conditions are virtually identical for the two permits. Compliance is as is listed below:

1. There were no visible emissions during my inspections.
2. The permit number was marked on the engine.
3. The serial numbers are listed above.
4. The engines are in compliance with the emission limitations as best as could be determined.
5. In compliance.
6. No odors were observed during my inspection.
7. Construction is completed.

Final approval is recommended for permit 88LP048 (5 and 6).

Lemon 88LP048 (7 and 8) Source #36

This site consists of two engines: 88LP048 (7) one Ajax DPC 360 horsepower serial #80750 and 88LP048 (8) one Ajax DPC 540 horsepower serial # unknown; it was reported as 5402. The serial number could not be found on the second engine. The number 5402 is a number the owner and operator, Tidewater Company, has put on the engine. It is not on a nameplate on the engine. The

Memorandum to
Dick Fox
February 28, 1989
Page Three

permit conditions are virtually identical for both engines and compliance status is found below:

1. There were no visible emissions during my inspections.
2. The permit number was marked on the engine.
3. The serial numbers are listed above; they were unavailable for one engine.
4. The engines are in compliance with the emission limitations as best as could be determined.
5. In compliance.
6. No odors were observed during my inspection.
7. Construction is completed.

Southern Ute 88LP048 (9 and 10) Source #37

This site has two engines which are described incorrectly in the permit. The description needs to be changed.

88LP048 (9) 1-Waukesha VRG 220, Serial #396351
88LP048 (10) 1- Waukesha VRG-220 Serial #396325

The permit conditions for the two permits are virtually identical. Compliance status is listed below:

1. There were no visible emissions during my inspections.
2. The permit number was marked on the engine.
3. The serial numbers are listed below.
4. The engines are in compliance with the emission limitations as best as could be determined.
5. In compliance.
6. No odors were observed during my inspection.
7. Construction is completed.

Final approval is recommended once the description of the engines has been revised.

Memorandum to
Dick Fox
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Page Four

POD-1 (Florida River Compressor Station) 88LP048 (4) #Source #34

This permit should be removed from this number and placed with the other four compressor engines which have been permitted for this same site under permit number 88LP186 (1-4). In addition, this site is no longer known as the POD-1 site and the name should be changed to the Florida River Compressor Station, 88LP048 (4) 1- White Superior 8 GTLA Serial #287569. Compliance with the permit conditions is found below.

1. There were no visible emissions during my inspections.
2. The permit number was marked on the engine.
3. The serial numbers are listed above.
4. The engine is in compliance with the emission limitations as best as could be determined.
5. In compliance.
6. No odors were observed during my inspection.
7. Construction is completed.
8. There was no leakage of air contaminants prior to the control equipment.

Final approval should be issued for this permit once the name of the site has been changed and the permit number has been changed.

0202g/3-6

BP AMERICA PRODUCTION CO – FLORIDA RIVER COMPRESSION FACILITY

Inspection Date: September 16 and 18, 2008

Inspection Report Date: July 30, 2009

EPA Representative: Emilio Llamozas *EL*

Tribal Representative: Mike King and Brenda Sakizzie

Company Representative: Julie Best

Inspection Report Reviewed By: Cindy Reynolds *CR*

Last Inspection: October 7, 2004

Permit Number: V-SU-0022-00.04 **Replaces Permit No.:** V-SU-0022-00.03
Issue Date: September 21, 2005
Effective Date: September 21, 2005
Expiration Date: June 5, 2006

I. Source Identification and Unit-Specific Information

I.A. General Source Information

Parent Company name: BP America Production Company

Plant Name: Florida River Compression Facility

Plant Mailing Address: 380 Airport Road, Durango, CO 81303

Plant Location: SE 1/4, SW1/4 of Section 25, T34N, R9W

Region: 8 **State:** Colorado **County:** La Plata

Reservation: Southern Ute **Tribes:** Southern Ute

Company Contact: Julie Best **Phone:** 970-375-7540

Responsible Official: Kourtney K. Hadrick **Phone:** 970-375-5705

Tribal Contact: James Temte **Phone:** 970-563-4705

SIC Code: 1311

AFS Plant Identification Number: 08-067-00034

AIRS Class: A

Regulations: Part 71 Title V, Synthetic Minor for PSD, and NSPS GG

Other Clean Air Act Permits: No other Federal Clean Air Act Permits

Compliance Assistance: Since the peaker engines serial numbers observed in the field did not match the serial numbers in the permit, we asked the facility to update the serial numbers in their Title V permit.

Summary of Enforcement Actions:

There has been no enforcement action in past 5 years at this facility.

Compliance Status:

The following violations were noted at the facility:

- BP America replaced/overhauled the engine component (gas compressor module, power turbine module and the accessory drive) of turbine A-02 the week of May 25, 2008. BP America did not submit to EPA Region 8 an off permit change letter for the replacement/overhaul of the engine component for turbine A-02 as required by section IV. R Off Permit Changes 4 and 7.
- The peaker engine serial numbers observed in the field did not match the serial numbers listed in the permit. BP America stated that they have not replaced any of the peaker engines and that a possible explanation of why the serial numbers are different is that the wrong serial numbers were supplied in the Title V application
- The inlet temperature and pressure drop catalyst data for the peaker engines was requested from November 2004 to the present. BP conducted an extensive investigation into EPA's request; however, BP America found that some of the inlet temperatures and pressure drops data for the peaker engine catalysts were potentially corrupted and missing. BP provided the data they collected during the investigation.

Description of Process:

The Florida River Compression Facility processes coal bed methane gas in order to reduce CO₂ and water content to within pipeline specifications and compresses this gas for delivery into interstate pipelines. The plant has four medium pressure gas inlets (Area 6, ECBM, MPP, Red Cedar) and two low pressure gas inlets (Area 1 East, Area West). Current plant throughput averages around 380 million standard cubic feet per day (MMscfd) with plant process capacity around 400 MMscfd. Low pressure gas (about 105 MMscfd) enters the plant through an inlet separator to remove free liquids after which it is compressed from 50 to 300 psig. Initial compression of low pressure gas is done by two electric driven, ammonia refrigerated screw compressors and two electric driven reciprocating compressors.

About 20 MMscfd of the low pressure gas is then commingled with medium pressure gas and treated by methyl-di-ethanol-amine (MDEA) sweetening to remove CO₂, followed by triethylene glycol (TEG) dehydration to remove water vapor from the gas. The low pressure gas bypassing amine mixes with amine treated gas in the dehydration header such that all gas is blended and identical going to the three dehydrators. The CO₂ and water vapor are vented to the atmosphere. The gas is then compressed to 800 psig and sent to El Paso, Transwestern or Northwest Pipeline for transport to market via interstate pipeline.

Gas from Area 6, ECBM and Red Cedar (about 75 MMscfd) enters the plant at 300 psig, goes directly to the treating processes and is then compressed to 800 psig and sent to market. Gas from the medium pressure pipeline enters the plant already low in CO₂ and previously dried at upstream compression. It is commingled with the processed gas and compressed for transport via pipeline.

The treating processes include two MDEA trains to remove CO₂ and three (TEG) dehydration units. Gas fired heaters are utilized to heat ethylene glycol (EG) which is used as the heat medium to generate lean MDEA from CO₂ saturated (rich) MDEA and for heating some tanks in the plant. The dehydrators are fired on natural gas to evaporate water from rich TEG. Post treatment compression consists of three electric driven centrifugal compressors, two "temporary" electric driven reciprocating compressors and two natural gas fired Solar Centaur turbine driven centrifugal compressors.

The plant is equipped with a ground flare "candle" system to combust gases that for various reasons cannot be sent to market. The flare system disposes of a minimum of about 100,000 scfd, but is designed to handle the full inlet for a very brief time in an emergency or plant upset situations.

Twelve 2922 hp diesel fired generator sets were installed at the plant in 2004 for the purpose of reducing plant electric load during times of monthly peak electrical grid load; which has the effect of significantly reducing the plant's electrical bill. Due to the infrequency of use combined with use of selective catalytic reduction for NO_x control, the emissions impact from these generators is minimal.

Current pigging operations include four receivers with varying diameters: two 16 inch, two 12 inch, one 10 inch, and one 8 inch, each about 6 feet long and operated at about 50 psi. Pigging operations occur once per month on average, totaling about 322 cubic feet at 50 psi.

The potential to emit for the facility as a whole are as follows:

Nitrogen Oxides (NO_x) – 282.07 tpy
Carbon Monoxide (CO) – 181.94 tpy
Volatile Organic Compounds (VOC) – 30.27 tpy
Small Particulates (PM₁₀) – 7.95 tpy
Sulfur Dioxide (SO₂) – 24.23 tpy
Total Hazardous Air Pollutants (HAPs) – 4.14 tpy
Largest Single HAP (formaldehyde, CH₂O) – 1.20 tpy

General Inspection Observations and Commentary:

On September 16, 2008 Hans Buenning, Laurie Ostrand and I from EPA and Southern Ute air quality specialists, Mike King and Brenda Sakizzie, met with BP America at the Southern Ute Environmental office in Ignacio. Representing BP America was Julie Best. After meeting at the Southern Ute Environmental Office we inspected different BP America compressor stations. On September 18, 2008 we looked at the records at the BP America main offices.

Opening Meeting –

- We stated that the purpose of this inspection was to evaluate compliance with the Title V permit.

- We asked BP America if we could walk through the facility and then indicated that we would like to check their records.
 - Annual compliance certifications and emission inventories
 - Replacement engine notifications to the EPA
 - Engine maintenance logs
 - Daily average gas throughput
 - Pressure and sources of inlet gas
 - Pressure and sources of outlet gas
- We also informed them that we would like to have them walk us through how they estimate their annual actual emissions.
- Before entering the Florida River Compression Facility we watched the safety video for the plant. After watching the safety video we took an exam to make sure we understood the safety rules for the facility.

Walk Through Inspection Observations –

Upon entering the facility we did not observe any visible emissions. We arrived at the facility at 4:22 pm and toured the facility.

BP America Production Company San Juan North Asset Surface Ownership

Legend

- Fruitland Coal Gas Well
- Conventional Gas Well
- FT/Conv Multiple Completion
- Water Disposal Well
- Nitrogen Injection Well
- Water Quality Monitor Well
- ★ BP Operations Office
- PSM Compressor Plant
- Compressor Site
- Wellsite Compressor
- Water Transfer Station
- ▭ Parcels
- ▭ Township - Range

0 1 2 4 Miles

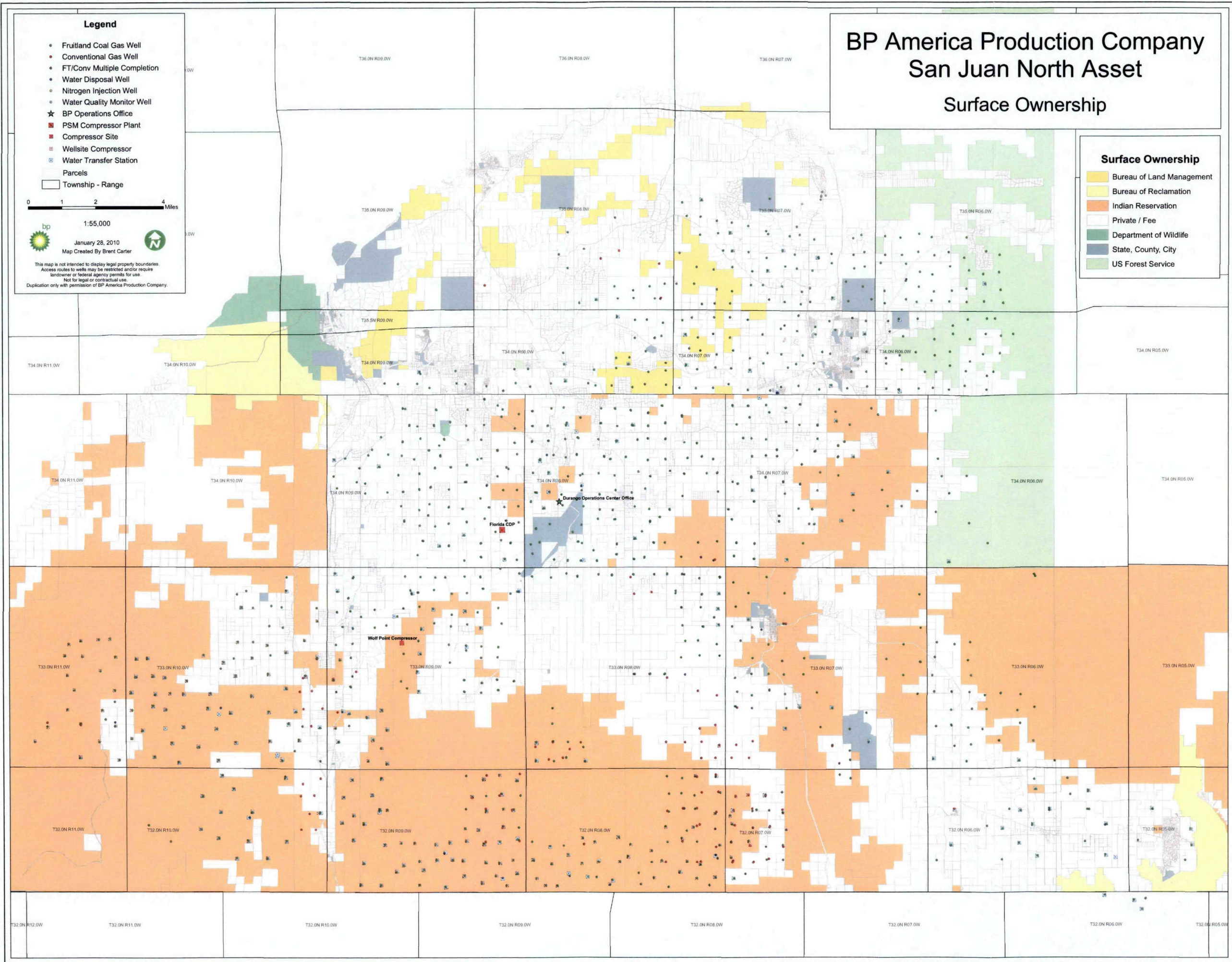
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January 28, 2010
Map Created By Brent Carter

This map is not intended to display legal property boundaries. Access routes to wells may be restricted and/or require landowner or federal agency permits for use. Not for legal or contractual use. Duplication only with permission of BP America Production Company.

Surface Ownership

- Bureau of Land Management
- Bureau of Reclamation
- Indian Reservation
- Private / Fee
- Department of Wildlife
- State, County, City
- US Forest Service



BP America Production Company San Juan North Asset Mineral Ownership

Legend

- Fruitland Coal Gas Well
- Conventional Gas Well
- FT/Conv Multiple Completion
- Water Disposal Well
- Nitrogen Injection Well
- Water Quality Monitor Well
- ★ BP Operations Office
- PSM Compressor Plant
- Compressor Site
- Wellsite Compressor
- Water Transfer Station
- Township - Range

0 1 2 4 Miles

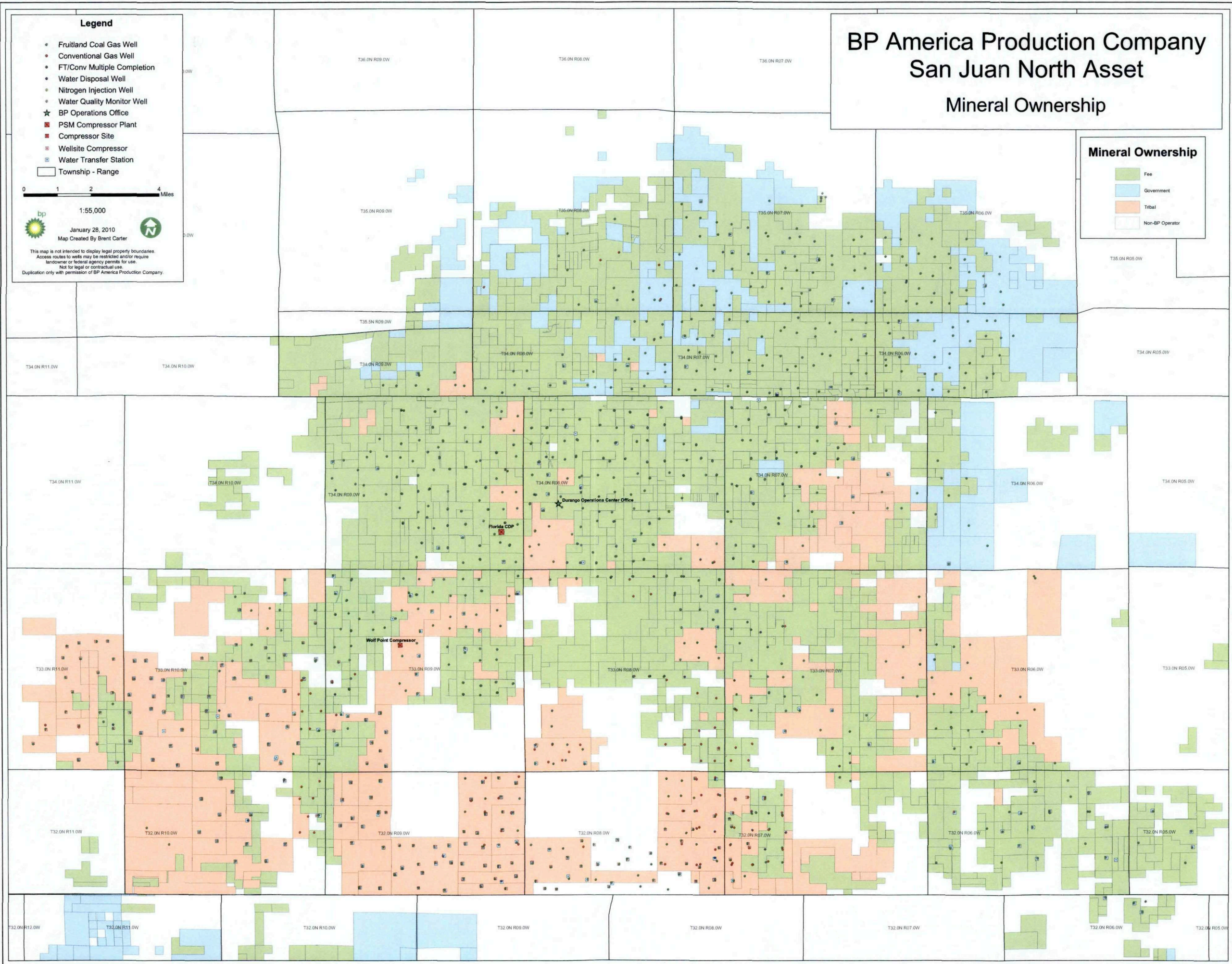
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January 28, 2010
Map Created By Brent Carter

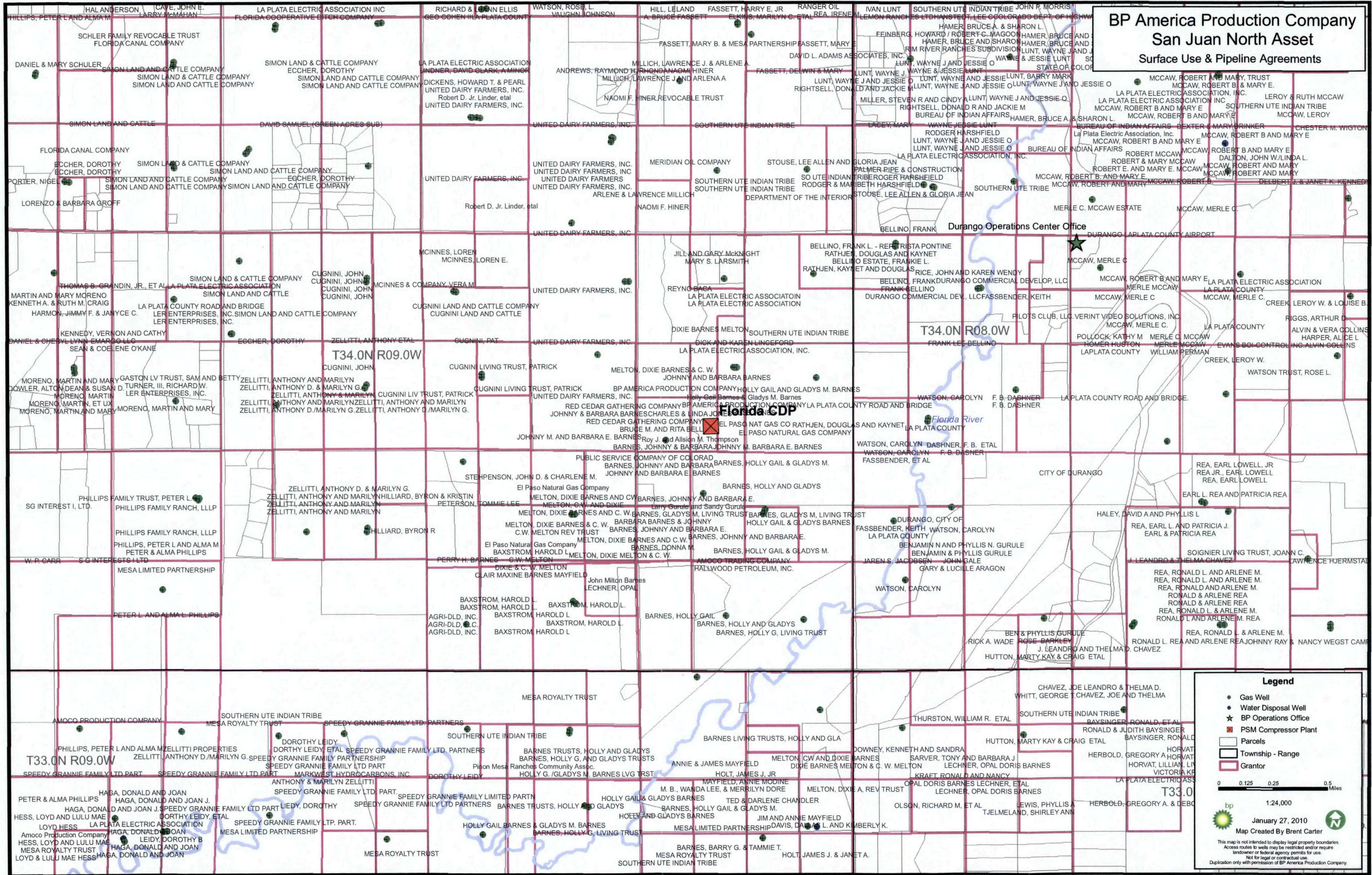
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Mineral Ownership

- Fee
- Government
- Tribal
- Non-BP Operator



BP America Production Company
San Juan North Asset
Surface Use & Pipeline Agreements



Legend

- Gas Well
- ★ Water Disposal Well
- ★ BP Operations Office
- PSM Compressor Plant
- ▭ Parcels
- ▭ Township - Range
- ▭ Grantor

0 0.125 0.25 0.5 Miles

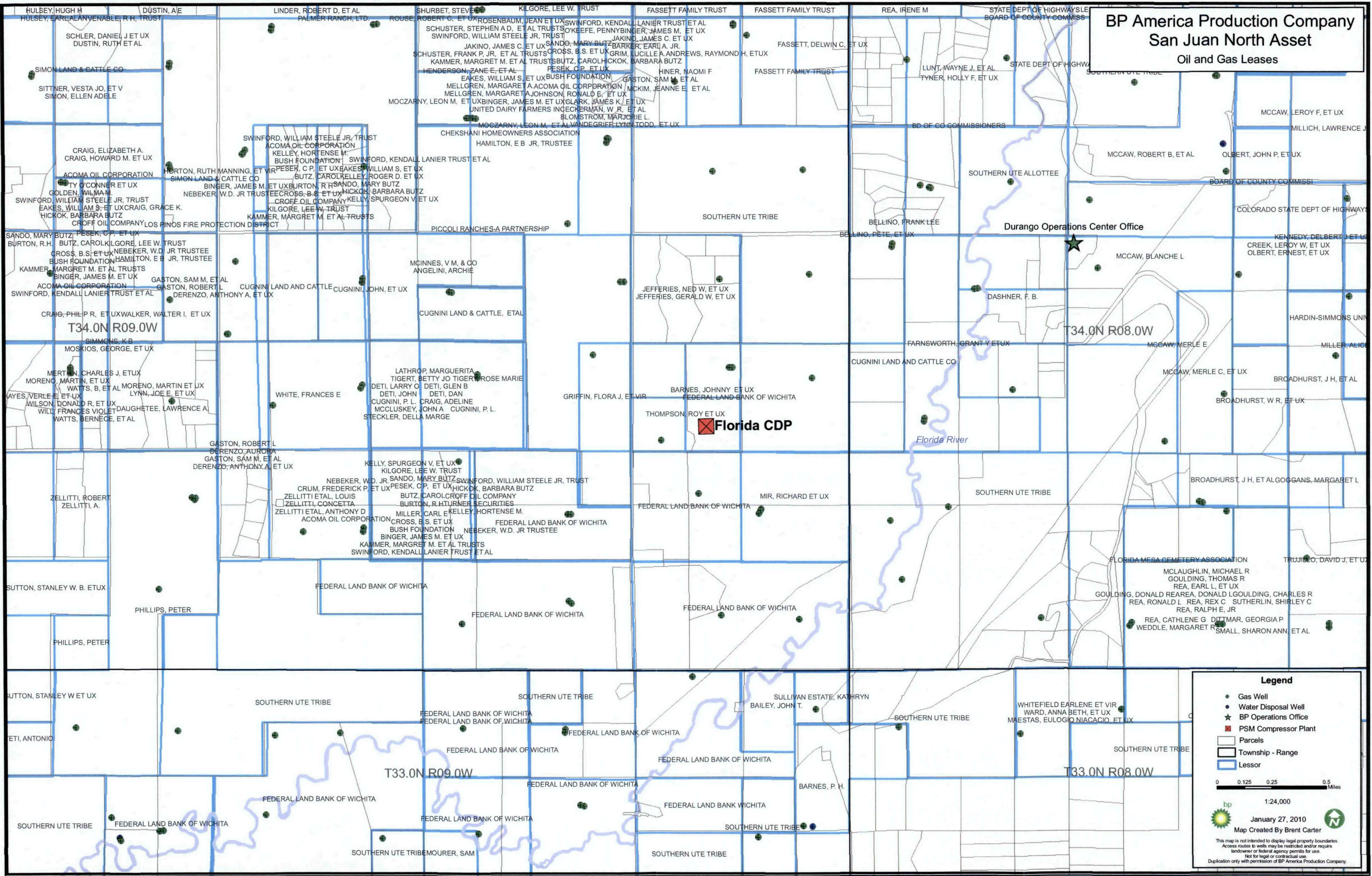
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January 27, 2010

Map Created By Brent Carter

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BP America Production Company
San Juan North Asset
Oil and Gas Leases



Legend

- Gas Well
- Water Disposal Well
- ★ BP Operations Office
- PSM Compressor Plant
- ▭ Parcels
- ▭ Township - Range
- ▭ Lessor

0 0.125 0.25 0.5 Miles

1:24,000

January 27, 2010
 Map Created By Brent Carter

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