



Environmental Department
188 County Road 4900
Bloomfield, NM 87413
505/632-4625
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July 9, 2003

Mr. Carl E. Edlund, P.E.
Director, Multimedia Planning and
Permit Division
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Mr. Guy Donaldson, 6PD-R
U.S. EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

re: Part 71 Operating Permit R6FOPP71-04
Williams Field Services' Los Mestenos Compressor Station

Dear Sirs,

Thank you for the opportunity to comment on the Statement of Basis and draft permit R6FOPP71-04 for Williams Field Services' Los Mestenos Compressor Station, located within the exterior boundaries of the Jicarilla Apache Reservation in Rio Arriba County, New Mexico. We would like to offer the following comments:

Statement of Basis

Paragraph 3.d notes that "this source is subject to the provisions of EPA permit NM-791-M2..." Prior to the determination that facilities within the exterior boundaries of a tribal reservation fell within the jurisdiction of the EPA (or the tribal agency if a Tribal Implementation Plan was approved), this facility had been permitted through the New Mexico Air Quality Bureau as a minor source (not subject to PSD). Although Williams has accepted the permit issued by EPA for a PSD minor source (criteria pollutant emissions less than 250 tpy for a source not in the 28 source categories) as it came about during both the transition from State to Federal jurisdiction, and during a change of ownership, we wish to learn the statutory authority in issuing this minor source permit. Williams has complied with this permit, and will continue to comply with the requirements as incorporated into the draft operating permit, but we would like clarification on the issuance of the minor source NSR permit.

Paragraph 3.e, Table 1: Since submittal of this application, Williams has become aware of an undocumented source of emissions found at this facility. The application currently lists VOC emissions from condensate tank Tk-1 that result solely from working and breathing losses. Williams has determined that flash emissions also occur from this tank, and wish to amend the application to incorporate these flash emissions. The VOC value in Table 1 should be 222 tpy, including both working and breathing losses, and flash emissions. The affected application forms plus tank flash emissions calculations are attached. Note that the Part 71 annual emissions fees paid in March 2003 included these tank flash emissions.

Paragraph 4 typographic correction: NSR permit no. NM-971-M2 should be NM-791-M2.

Paragraph 4.c requires monthly recordkeeping of fuel flow/consumption for emission units 1 and 2 without citing an applicable regulation. If this is a new requirement without a regulatory driver, Williams would suggest changing this fuel flow recordkeeping requirement to an hours of operation recordkeeping requirement consistent with the existing NSR permit.

COPY

July 9, 2003

Paragraph 6.a states that public notice has been published in a bi-weekly newspaper of general circulation. We understand that this newspaper was the Jicarilla Times. What was the date of publication?

Draft Permit R6FOPP71-04

Condition 1.1: Responsible Official's address and phone number should be:

Mr. Jeff Baumer
Director, Four Corners Area
Williams Field Services
One Williams Center
MD WRC 3-7
Tulsa, OK 74172
(918) 573-9720

Condition 1.1: Standard Industrial Code (SIC) should only be 1389.

Condition 1.1: Description of Process should be "Williams Field Services' Los Mestinos Compressor Station, with SIC code 1389, is a natural gas compressor station that accepts produced natural gas gathered from various wellheads from the gas field surrounding the facility, and compresses this gas for delivery to natural gas processing facilities. This is done on a contractual basis as a service to the natural gas producers."

Condition 1.2 Table 2: The VOC value in Table 1 should be 222 tpy, including both working and breathing losses, and flash emissions. See comment SOB Paragraph 3.e Table 1, above.

Conditions 3.2.5, 3.2.6 and 3.2.9.1: pending resolution of comment SOB Paragraph 4.c, above, the monitored parameter in these conditions should be changed from fuel flow to hours of operation.

Condition 3.2.7: Typographical error: - the last sentence should reference condition 3.2.9.

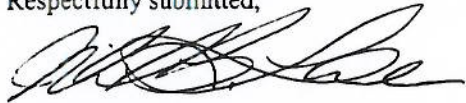
Condition 3.2.9: Orphan phrase or typographical error at the end of this condition "every six months permit issuance."

Condition 3.2.9: Williams would suggest changing the submittal date deadline of the semi-annual report to "within 45 days following every six months from the date of issuance of this permit" to allow the semi-annual report to cover the affected six-month period.

Condition 5.3: Williams would suggest changing the submittal date deadline of the annual certification of compliance to "annually, within 45 days of the anniversary date of issuance of this permit" to allow the certification to cover the one-year period up to the anniversary date.

Again, thank you for the opportunity to comment on this draft permit. Please email or call if you have any questions.

Respectfully submitted,

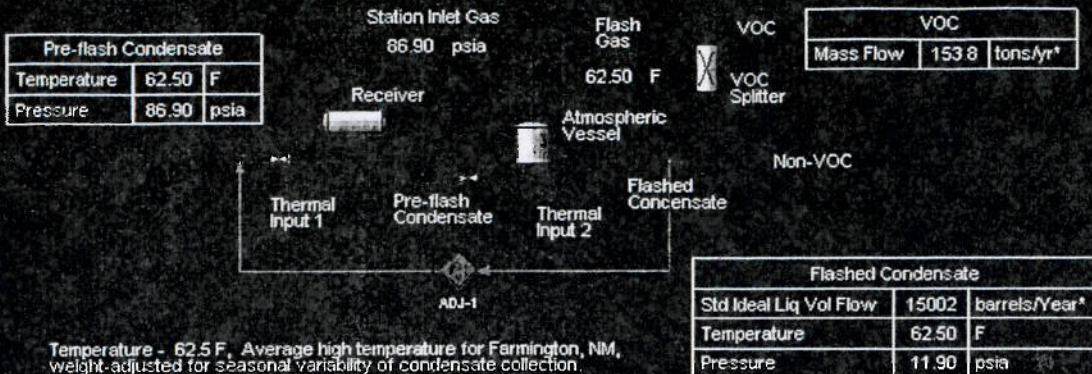


Michael K. Lane, PE
Environmental Specialist
Michael.K.Lane@Williams.com

Xc: WFS file 140

Encl:

LOCATION - Los Mestenos



Temperature - 62.5 F, Average high temperature for Farmington, NM, weight-adjusted for seasonal variability of condensate collection.

Atmospheric Pressure - 11.9 PSIA (Farmington, NM)

HYSYS Model Results

Location: Los Mestenos Compressor Station

2002 Condensate Volume (post-flash): 15,002 bbls

2002 VOC Emissions: 153.8 Tons

| Name | Pre-flash Condensate | Flashed Condensate | Flash Gas | VOC | VOC w/40% Safety Factor |
|------------------------------------|----------------------|--------------------|-----------|--------------------------|------------------------------|
| Vapour Fraction | 0.0 | 0.0 | 1.0 | 1.0 | |
| Temperature [F] | 62.5 | 62.5 | 62.5 | 75.0 | |
| Pressure [psia] | 86.9 | 11.9 | 11.9 | 11.2 | |
| Molar Flow [MMSCFD] | 4.936E-02 | 4.115E-02 | 8.210E-03 | 5.591E-03 | |
| Mass Flow [tons/yr*] | 2001.7 | 1816.4 | 185.2 | 153.8 | 215.35 |
| Liquid Volume Flow [barrels/Year*] | 17,055.2 | 15,002.0 | 2,053.2 | 1,532.5 | |
| Molecular Weight | 84.26 | 91.71 | 46.88 | 57.16 | |
| Name | Pre-flash Condensate | Flashed Condensate | Flash Gas | Tons of VOC (calculated) | Tons of VOC w/ Safety Factor |
| Comp Mass Frac (CO2) | 0.00035 | 0.00002 | 0.00351 | na | na |
| Comp Mass Frac (Nitrogen) | 0.00000 | 0.00000 | 0.00000 | na | na |
| Comp Mass Frac (Methane) | 0.00391 | 0.00009 | 0.04135 | na | na |
| Comp Mass Frac (Ethane) | 0.01316 | 0.00178 | 0.12473 | na | na |
| Comp Mass Frac (Propane) | 0.03949 | 0.01541 | 0.27559 | 51.05 | 71.47 |
| Comp Mass Frac (i-Butane) | 0.02248 | 0.01489 | 0.09698 | 17.96 | 25.15 |
| Comp Mass Frac (n-Butane) | 0.05384 | 0.04074 | 0.18229 | 33.77 | 47.27 |
| Comp Mass Frac (i-Pentane) | 0.05596 | 0.05264 | 0.08849 | 16.39 | 22.95 |
| Comp Mass Frac (n-Pentane) | 0.05658 | 0.05542 | 0.06797 | 12.59 | 17.63 |
| Comp Mass Frac (2-Mpentane) | 0.07274 | 0.07626 | 0.03821 | 7.08 | 9.91 |
| Comp Mass Frac (n-Hexane) | 0.05682 | 0.06046 | 0.02116 | 3.92 | 5.49 |
| Comp Mass Frac (Mycyclopentan) | 0.00000 | 0.00000 | 0.00000 | 0.00 | 0.00 |
| Comp Mass Frac (Benzene) | 0.01002 | 0.01069 | 0.00348 | 0.65 | 0.90 |
| Comp Mass Frac (Cyclohexane) | 0.04049 | 0.04344 | 0.01153 | 2.14 | 2.99 |
| Comp Mass Frac (2-Mhexane) | 0.14269 | 0.15494 | 0.02252 | 4.17 | 5.84 |
| Comp Mass Frac (n-Heptane) | 0.05350 | 0.05833 | 0.00615 | 1.14 | 1.60 |
| Comp Mass Frac (Mycyclohexane) | 0.00000 | 0.00000 | 0.00000 | 0.00 | 0.00 |
| Comp Mass Frac (Toluene) | 0.03978 | 0.04344 | 0.00383 | 0.71 | 0.99 |
| Comp Mass Frac (2-Mheptane) | 0.18069 | 0.19818 | 0.00917 | 1.70 | 2.38 |
| Comp Mass Frac (n-Octane) | 0.03318 | 0.03644 | 0.00117 | 0.22 | 0.30 |
| Comp Mass Frac (E-Benzene) | 0.00302 | 0.00332 | 0.00009 | 0.02 | 0.02 |
| Comp Mass Frac (m-Xylene) | 0.02555 | 0.02809 | 0.00063 | 0.12 | 0.16 |
| Comp Mass Frac (o-Xylene) | 0.00000 | 0.00000 | 0.00000 | 0.00 | 0.00 |
| Comp Mass Frac (n-Nonane) | 0.05598 | 0.06162 | 0.00063 | 0.12 | 0.16 |
| Comp Mass Frac (Cumene) | 0.03979 | 0.04379 | 0.00051 | 0.09 | 0.13 |
| Comp Mass Frac (n-PBenzene) | 0.00000 | 0.00000 | 0.00000 | 0.00 | 0.00 |
| Comp Mass Frac (124-MBenzene) | 0.00000 | 0.00000 | 0.00000 | 0.00 | 0.00 |
| Comp Mass Frac (n-Decane) | 0.00000 | 0.00000 | 0.00000 | 0.00 | 0.00 |
| Comp Mass Frac (n-C11) | 0.00000 | 0.00000 | 0.00000 | 0.00 | 0.00 |
| TOTAL | 1.00000 | 1.00000 | 1.00000 | 153.82 | 215.35 |

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 1 of form GIS. If form FEE does not need to be submitted with the application, do not calculate actual emissions.

B. Identification and Quantification of Emissions

[illegible]

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 Los Mestenos Compressor Station

Mailing address: 188 County Road 4900

City Bloomfield State NM ZIP 87413

Contact person: Michael Lane Title Environmental Specialist

Telephone (505) 632 - 4625 Ext. _____

Facsimile (505) 632 - 4781

B. Facility Location

Temporary source? Yes ☒ No ☐ Plant site location Sections 25 & 26,
Township 26N, Range 5W (UTM Zone 13, 292.2 km east, 4036.5 km north)

City 24 kilometers northwest of Gavilan State NM County Rio Arriba

EPA Region 6

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)? Colorado

C. Owner

Name Williams Field Services Company Street/ P.O. Box P.O.
Box 21899

City Tulsa State OK ZIP
74121 - 1899

Telephone (918) 573 - 2000 Ext. _____

D. Operator

Name Williams Field Services Company Street/ P.O. Box 188 County Road
4900

City Bloomfield State NM ZIP
87413 - _____

Telephone (505) 632 - 4600 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? 11 / 15 / 79

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

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/Reqs.

☐ 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

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

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

| Process | Products | SIC |
|-------------------------|-------------|------|
| Natural gas compression | Natural gas | 1389 |
| | | |
| | | |
| | | |

[illegible]

* Refer to attached simplified flow diagram.

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 83 tons/yr VOC 228 tons/yr SO2 neg. tons/yr
PM-10 neg. tons/yr CO 239 tons/yr Lead N/A tons/yr

Total HAP 10 tons/yr

Which single HAP emitted in the greatest amount? n-Hexane PTE?
6.6 tons/yr

Total emissions of regulated pollutants (for fee calculation) from section F, line 5 of form FEE? 246 tons/yr

(from 2002 Emissions Inventory and Annual Fee).

K. Existing Federally Enforceable Permits:

Permit number(s) NM-791-M2 Permit type Authorization to construct
Permitting authority EPA Region 6

(EPA Region 6 issued this permit to an NSR minor source [PTE = 239.5 tpy CO] on September 24, 1996)

L. Emission Unit(s) Covered by General Permits N/A

Emission unit(s) subject to general permit

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) EPA Permit NM-791-M2

Note: neg. = negligible (less than 0.01 ton/year)