Attachment H

Oakley Hayes

From: LeDoux, Erica <LeDoux.Erica@epa.gov>
Sent: Friday, August 5, 2022 4:49 PM
To: Oakley Hayes
Cc: Kaleri, Cynthia; Monica Smith; jnewby@cirrusllc.com; Yoon, Jonathan
Subject: RE: [EXTERNAL] Application to Renew Title V Operating Permit Number R6FOP-NM-04-R2
Attachments: Los Mestenios Compressor Station Clarification Questions from July 27 Meeting_final.docx

Hi Oakley,

I am providing a checklist of clarification questions we discussed during our call on July 27. During our meeting I don't remember us discussing a timeline for responding back to these questions. Please provide responses by Aug 17. Please let me know if you need more time. You can upload whatever information to the FTP site that you do have presently. The link to the FTP was provided in a previous email. There is no need to wait and upload information all at once.

Thank you, Erica

Erica G. Le Doux, Environmental Engineer
U.S. EPA Region 6 (Arkansas, Louisiana, Oklahoma, New Mexico, Texas & 66 Tribal Nations)
Air and Radiation Division Air Permits Section (ARPE)
1201 Elm Street, Suite 500
Dallas, TX 75270
Office: (214) 665-7265
Fax: (214) 665-6762
ledoux.erica@epa.gov

From: Oakley Hayes <Oakley.Hayes@harvestmidstream.com>
Sent: Thursday, April 14, 2022 10:22 AM
To: LeDoux, Erica <LeDoux.Erica@epa.gov>; jnewby@cirrusllc.com
Cc: Kaleri, Cynthia <kaleri.cynthia@epa.gov>
Subject: RE: [EXTERNAL] Application to Renew Title V Operating Permit Number R6FOP-NM-04-R2

Erica,

Please see the attached response from Harvest. If you need any additional information, or if you would like to discuss further, please let me know.

Regards,

Oakley Hayes
Environmental Specialist
Harvest Midstream Company
O: 505-632-4421 C: 970-903-3203

From: Oakley Hayes
Sent: Monday, April 11, 2022 10:45 AM
To: LeDoux, Erica <LeDoux.Erica@epa.gov>; jnewby@cirrusllc.com
Cc: Kaleri, Cynthia <kaleri.cynthia@epa.gov>
Subject: RE: [EXTERNAL] Application to Renew Title V Operating Permit Number R6FOP-NM-04-R2

Erica,

We are working to get you the supplemental information requested.

Regards,

Oakley Hayes
Environmental Specialist
Harvest Midstream Company
O: 505-632-4421 C: 970-903-3203

From: LeDoux, Erica <LeDoux.Erica@epa.gov>
Sent: Tuesday, April 5, 2022 4:34 PM
To: Oakley Hayes <Oakley.Hayes@harvestmidstream.com>; jnewby@cirrusllc.com
Cc: Kaleri, Cynthia <kaleri.cynthia@epa.gov>
Subject: [EXTERNAL] Application to Renew Title V Operating Permit Number R6FOP-NM-04-R2

Mr. Hayes,

Please find the attached incompleteness letter for the application to renew the Harvest Four Corners, LLC – Los Mestenios Compressor Station Part 71 Operating Permit. The facility is located on Jicarilla Apache Reservation in Rio Arriba County, New Mexico. The current permit number is R6FOP-NM-04-R4 issued August 8, 2017.

Respectfully,

Erica G. Le Doux, Environmental Engineer
U.S. EPA Region 6 (Arkansas, Louisiana, Oklahoma, New Mexico, Texas & 66 Tribal Nations)
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- Provide a detailed facility process description that identifies all unit operations at the facility. The process description should include an explanation of each process unit and any emissions from that component (i.e., how the equipment operated, what is the vessel's purpose in the operation of this facility, and a step-by- step explanation of how material is transferred through the process tanks), including the characterization of material being processed or stored (i.e., condensate, produced water, vapors vented or returned to gas line). Include all auxiliary equipment descriptions such as heaters, sump pumps, Amitrol and Methanol usage, etc.

- Provide a process flow diagram that represents current facility operations and matches the process description provided in the text. All inputs and outputs and equipment should be labeled and direction of flow indicated appropriately. Also, it should be clear where emission occur and should match emission units presented in the application. Indicate both line pressure and process unit pressure and any changes in pressure as part of normal operations. Please provide pictures of the existing and any new equipment (tanks, heaters, turbines, compressor engines, emergency generator) that clearly delineate nameplates for the permit record. Please provide manufacturer spec sheet, design information or data and serial numbers of new and old equipment.

- Include the custody transfer point on the facility diagram or process flow diagram, whether upstream of or at the facility property boundary (e.g., upstream of pigging unit?) and provide copies of current contracts for amount of material transferred to the facility for processing (i.e., should coincide with representative throughputs provided in the permit application, with contingencies identified for possible future increase in throughput).

Example of Missing Info for Emission Units and Control Devices

{Please complete filling in missing information and confirm information provided from current application below:}

Emission Unit No.	Type of Unit Serial No.	Manufacturer Model No. Design Heat Input	Operating Range or Size of Unit	Date of Installation and Construction	Primary Use	Control Equipment
T-1	Condensate Storage Tank Serial Number?		490 bbl			
T-2	Condensate Storage Tank Serial Number?		400 bbl			
F-1	Valves, Flanges, Seals, etc. Unknown					

MSS	Maintenance, Startup, and Shutdown Emissions					

Insignificant Emissions

{Please complete filling in missing information and confirm information provided from current application below:}

Emission Unit ID No.	Unit Description	Size	Exemptions to Federal Requirements
Unit 4	Fuel Gas Heater	0.3 MMBtu/hr	• < 2 tpy regulated pollutants and < 0.5 tpy HAPs • Provide what method, simulation, etc. used to calculate emissions, e.g., VMGSym, etc. • Provide Federal citation for exemption
Unit 5	Tank Heater	0.3 MM Btu/hr	
L1	Truck Loading Condensate	XX bbl or # of events	
L2	Truck Loading Produced Water		
T3	Produced Water StorageTank		
T4	Lube Oil Storage Tank		
T5	Lube Oil Storage Tank		
T6	Amitrol Storage Tank		
T7	Methanol Storage Tank		

- What is the pressure relief valve settings for the condensate tanks? Where does the gas go after flashing? Is it routed back to the process or gas line, if so, where? Please indicate all atmospheric vents on the process flow diagram appropriately.

- Is the Equipment Leaks an actual and recent count of components?

- Provide an applicability discussion for the turbine, new compressor engine and emergency generator. Provide performance testing requirements for the new engine. Also, provide the following information for the engines.

{Please complete filling in missing information and confirm information provided from current application below:}

Unit	Make /Model	Serial Number	Date of construction and installation	Operating Range or Size HP (Also include: 2 or 4 stroke, rich or lean burn?)	Fuel Type	Engine use	Pollution Control
Unit 1	Solar Saturn Turbine T1200						
Unit 2	Waukeska L7042 GL						
Unit 3	Scania F674DSU-DS11A06						

- Harvest has stated that the concentration of the condensate has changed, and these specific changes have decreased the flash emissions from the condensate tanks that would result in an overall emission limit decrease. However, substantiation of such changes to throughput and complete characterization *changes* need to be a part of the permit application. Data that is provided should match up to contracts currently in place vs historically in place, or onsite characterization efforts need to match up with historical vs current data analyses for all streams coming into the facility at specified throughput rates.

- Harvest stated that it is common for the concentrations of the condensate transferred from a well to change over time. Provide information on other Harvest facilities or same type facilities that can be used to support the assertions that have been made for this project if site-specific data is not available (e.g., contracts with upstream facilities providing the material processed at Los Mestenios facility)

- Harvest has stated that sampling only occurs "as needed" and no more frequently than once per year. Is this condensate sample retrieved at the same time of year? Are there seasonal changes in material coming into the site? Would the constituents in the sample that is collected in Nov/Dec be different than a sample collected in June/July? Would the sample profile be different? Is there a seasonal effect on flash emissions from the condensate tanks? Is there more flashing in the condensate tanks in the summertime?

- Are the changes to the condensate concentration permanent changes and indicative of current operations?

- Indicate pipeline pressures on the process flow diagram

- Verify sample location of condensate and indicate on process flow diagram