From:	Cudney-Black, Jane
To:	Okubo, Noreen
Cc:	Leann.Plagens@cci.com; Tuttle, Joshua S; Ryan Kelly (Ryan.Kelly@CCI.com)
Subject:	CCI San Juan, Barker Creek, Draft Review of Title V Permit
Date:	Thursday, July 23, 2015 2:35:34 PM
Attachments:	DRAFT REVIEW Operating Permit San Juan 072315.pdf

Attached is copy of the draft Title V permit with CCI's comments. I have highlighted our comments and put comments on "sticky notes". CCI's comments largely pertain to the following:

- Company name should be listed as CCI San Juan LLC
- Site location Lat Long coordinates are corrected to 36.928953 N, -108.284344 W (based on WGS 84)
- Unit numbers are corrected based on information submitted with permit application
- Unit serial numbers are corrected based on information submitted with the permit application
- The job title of the facility RO is updated

Please contact me if you have questions about the comments we have made, or if there are any further questions regarding this application. We trust that an e-mail copy of the draft review is sufficient, but let me know if I need to follow up with a hard copy.

Thank you for your assistance,

Jane Cudney-Black
Senior Project Manager
Weston Solutions, Inc.
3840 Commons Avenue, NE
Albuquerque, NM 87109

(505) 837-6579 (ofc)
(505) 980-6575 (cell)
(505) 837-6595 (fax)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08

JUL 6 2015

Ref: 8P-AR

Brad Burmaster
Vice President/General Manager
CCI San Juan, LLC
811 Main Street, Suite 3500
Houston, TX 77002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Draft Part 71 Operating Permit
Title V Permit #V-UM-000001-2014.00
CCI San Juan, LLC
Barker Creek Compressor Station

Dear Mr. Burmaster:

The Environmental Protection Agency, Region 8, has completed its review of Castleton Commodities Incorporated San Juan, LLC's (CCI San Juan) application for the Barker Creek Compressor Station to obtain a renewal Title V operating permit pursuant to 40 CFR Part 71 (Part 71). The EPA received the application on October 2, 2014.

Enclosed you will find the draft Part 71 operating permit and the corresponding Statement of Basis. The regulations at 40 CFR 71.11(d) require that an applicant, the public and affected states have the opportunity to submit written comments on any draft Part 71 operating permit. All written comments submitted within 30 calendar days after the public notice is published will be considered by the agency in making its final permit decision. Public notice will be published in the Farmington Daily Times on Monday, July 13, 2015. The public comment period will end on Wednesday, August 12, 2015.

The conditions contained in the permit will become effective and enforceable by the agency if the permit is issued final. If you are unable to accept any term or condition of the draft permit, please submit your written comments, along with the reason(s) for non-acceptance to:

Part 71 Permitting Lead
U.S. EPA, Region 8
Air Program (8P-AR)
1595 Wynkoop Street
Denver, Colorado 80202

If you have any questions concerning the enclosed draft permit or Statement of Basis, please contact Noreen Okubo of my staff at (303) 312-6646.

Sincerely,

Carl Daly, Director
Air Program

Enclosures (2)

cc: Honorable Manuel Heart, Ute Mountain Ute Tribe, Chairman
Scott Clow, Ute Mountain Ute Tribe, Environmental Director
Leann Plagens, CCI San Juan LLC, Vice President Environment, Safety, Health, & Regulatory Compliance
Jane Cudney-Black, Weston Solutions Inc, Senior Project Manager

Public Notice: Request For Comments

Proposed Air Quality Operating Permit for Federal Clean Air Act Title V to Control Air Pollutant Emissions from Barker Creek Compressor Station on the Ute Mountain Ute Indian Reservation

Public notice issued:
July 13, 2015

Written comments due:

5 p.m., August 12, 2015

For further information, contact:

Noreen Okubo, U.S. EPA Region 8

What is being proposed?

EPA proposes to issue a Clean Air Act (CAA), 40 Code of Federal Register, Part 71, Title V Operating Permit for the Barker Creek compressor station on the Ute Mountain Ute Indian Reservation.

Castleton Commodities Inc. San Juan LLC
Barker Creek Compressor Station
811 Main Street
Houston TX 77002

EPA issues CAA Title V operating permits in Indian country where EPA has not approved a tribe to implement the Title V operating permit program. The Ute Mountain Ute Indian Reservation does not have an approved Title V operating permit program.

Air pollutant emissions come from the compressor engine. The draft operating permit includes requirements for air pollutant emissions control.

Permit number:
V-UM-000001-2014.00

Draft CAA Title V Operating Permit
Ute Mountain Ute Indian Reservation

U. S. Environmental Protection Agency
Region 8
Air Program

1595 Wynkoop Street
Denver CO 80202

800.227.8917

How can I review documents?

You can review the draft CAA Title V Operating Permit, the application, and Statement of Basis at:

San Juan County Clerk Office
100 South Oliver Drive
Aztec, NM 87410

Ute Mountain Ute Tribe
Environmental Programs Office
124 Mike Wash Road
Towaoc, CO 81334
970-565-3751

U.S. EPA Region 8
Air Program Office (8P-AR)
1595 Wynkoop St.
Denver, CO 80202
Phone: 303-312-6646

All documents will be available for review at the U.S. EPA Region 8 office Monday through Friday from 8:00 am to 4:00 pm (excluding Federal holidays).

Electronic copies of the proposed Title V permit, Statement of Basis and all supporting materials may also be viewed at:
http://www2.epa.gov/region8/air-permit-public-comment-opportunities

What are EPA's responsibilities?

The U.S. EPA Region 8 Air Program is the regulatory agency that helps protect and preserve air quality on the Ute Mountain Ute Indian Reservation. One way EPA does this is by issuing CAA Title V operating permits for major air emission sources that require air pollutant emissions control and monitoring. The purpose of this notice is to invite you to submit written comments on this proposed permit through the process detailed in this notice.

What happens next?

EPA will review and consider all comments received during the comment period.

Following this review, EPA may issue the permit, issue with revisions, or deny the permit.

Public Comment Period:

The EPA will accept written comments on this draft Title V Operating Permit beginning:

July 13, 2015 through 5 p.m. August 12, 2015.

Where can I send written comments?

EPA accepts comments by mail, fax and e-mail.

How can I make comments by e-mail?

To make comments via e-mail, click on the name of the contact person at the website below.

U.S. EPA
Region 8 Air Program
8P-AR
Tribal Permit Program
1595 Wynkoop Street
Denver CO 80202
Fax: 303-312-6064

http://www2.epa.gov/region8/air-permit-public-comment-opportunities

Notice of Intent to Issue Clean Air Act
Title V Federal Operating Permit
United States Environmental Protection Agency
Region 8, Air Program

Take notice that the United States Environmental Protection Agency (U.S. EPA) has received an application to issue an operating permit that regulates air pollution emissions from the following source located within the exterior boundaries of the Ute Mountain Ute Indian Reservation in San Juan County, New Mexico:

Castleton Commodities Incorporated San Juan LLC
Barker Creek Compressor Station

This source is required to obtain a Clean Air Act title V Permit to Operate in accordance with Part 71 of Title 40 of the Code of Federal Regulations. The permit contains all the Clean Air Act requirements that apply to the source and will require that the source conduct monitoring sufficient to enable U.S. EPA and the public to determine whether the source is complying with the air quality requirements that apply to it. This proceeding is subject to the administrative requirements of 40 CFR 71.11.

Members of the public may review copies of the draft permit prepared by U.S. EPA, the Statement of Basis for the draft permit, the application, and all supporting materials submitted by the source, at the San Juan County Clerk's Office in Aztec New Mexico, the Ute Mountain Ute Indian Tribe's Environmental Programs Office (124 Mike Walsh Road) Towaoc, Colorado, and at the U.S. EPA Region 8 office in Denver, Colorado. All documents will be available for review at the U.S. EPA Region 8 office Monday through Friday from 8:00 a.m. to 5:00 p.m. (excluding Federal holidays). Electronic copies of the draft permit and Statement of Basis may also be viewed at: http://www2.epa.gov/region8/air-permit-public-comment-opportunities.

If you have comments on the draft permit, you have 30 calendar days from the date of this notice to submit them. You have the right to request a public hearing on the draft permit. Requests for a public hearing must be made by the close of the 30-day public comment period, must include the issues proposed to be raised at the hearing, and must contain your reasons for requesting a hearing. If a public hearing is granted, the comment period will be extended through the date of the public hearing. All comments and public hearing requests should be addressed to Noreen Okubo, U.S. EPA, Region 8, Air Program (8P-AR), 1595 Wynkoop Street, Denver, CO 80202. All comments received on or before August 12, 2015 will be considered in arriving at a final decision on the permit. The final permit is a public record that can be obtained upon request. A statement of reasons for changes made to the draft permit and responses to comments received will be sent to persons who commented on the draft permit.

If you believe any conditions of the draft permit are inappropriate, you must raise all reasonably ascertainable issues and submit all reasonably ascertainable arguments supporting your position by the end of the comment period. Any supporting materials that you submit must be included in full and may not be incorporated by reference, unless they are already part of the administrative record for this permit proceeding or consist of tribal, or federal statutes and regulations, U.S. EPA documents of general availability, or other generally available referenced materials.

If you would like to be added to our mailing list to be informed of future actions on these or other Clean Air Act permits issued in Indian country, please send your name and address to Part 71 Lead, U.S. EPA Region 8, Air Program (8P-AR), 1595 Wynkoop Street, Denver, CO 80202-1129.

Air Pollution Control
Federal Clean Air Act (CAA) Title V Permit to Operate
Statement of Basis for Draft Permit No. V-UM-000001-2014.00

CCI San Juan LLC
Barker Creek Compressor Station
Ute Mountain Ute Indian Reservation
San Juan County, New Mexico

I. Facility Information

A. Location

The Barker Creek Compressor Station (Barker Creek) is owned and operated by Castleton Commodities Incorporated San Juan, LLC (CCI San Juan) and is located within the exterior boundaries of the Ute Mountain Ute Indian Reservation, in the northwestern part of the State of New Mexico. The exact location is Latitude 36.928953N, Longitude -108.284344W, San Juan County, New Mexico. The mailing address is:

Barker Creek Compressor Station
99 County Road 6500
Kirtland, New Mexico 87417

B. Contact

Leann Plagens
CCI San Juan LLC
811 Main Street Suite 3500
Houston, TX 77002
leann.plagens@cci.com

C. Description of Operations

Barker Creek is a natural gas compressor station, which began operation in 2003. This is the first Part 71 renewal for the Barker Creek facility. The inlet gas and any associated pipeline liquids entering the compressor station pass through a horizontal separator (not a Joule-Thompson or dewpoint skid) where natural gas is separated and routed to the inlet of the compressor. Pipeline liquids are primarily water and are routed as a single phase to offsite storage not owned or operated by CCI San Juan. In the event any associated condensate is entrained with the water, flashing emissions are routed along with the natural gas to the inlet of the compressor. The separator is not an emissions source, as inlet gas and separated natural gas and pipeline liquids are routed to and from the separator through a closed-vent piping system, and no other equipment is connected with the separator. The compressor is driven by a natural gas-fired rich-burn reciprocating internal combustion engine (RICE). CCI San Juan voluntarily operates non-selective catalytic reduction (NSCR) emission control system on the compressor engine, as the engine is not subject to any federally enforceable requirements mandating its use.

D. Emission Points

Table 1 lists emission units and emission generating activities, including any air pollution control devices. The Title V Operating Permit Program at 40 CFR Part 71 (Part 71) allows the Permittee to separately list in the permit application units or activities that qualify as "insignificant" based on potential emissions below 2 tons per year (tpy) for all regulated pollutants that are not listed as hazardous air pollutants (HAPs) under section 112(b) and below 1,000 lbs/year or the de minimis level established under section 112(g), whichever is lower, for HAPs. However, the application may not omit information needed to determine the applicability of, or to impose, any applicable requirement. Units and activities that qualify as "insignificant" for the purposes of the Part 71 application are in no way exempt from applicable requirements or any requirements of the Part 71 permit.

Table 1 – Emission Units and Emission Generating Activities

Unit I.D.	Description	Control Equipment
C-1101	Waukesha L5794GSI 4-stroke RICE, 1,380 hp, 3.51 MMBtu/hr, natural gas-fired: Serial No. C-14422/1 Installed: 8/26/2003 Mfg:[prior to June 12, 2006]	NSCR 3-Way Converter (not enforceable)
IEU	Process fugitives (fugitive emissions from gas valves, light liquid valves, relief valves, liquid flanges, open-ended lines, compressor seals, pump seals, and gas flanges)	

* Mfg = Manufactured; hp = horsepower;
MMBtu/hr = million British thermal units per hour.

E. Potential to Emit

Pursuant to 40 CFR 52.21, potential to emit (PTE) is defined as the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation, or the effect it would have on emissions, is federally enforceable. Independently enforceable applicable requirements are considered enforceable to the extent that the source is in compliance with the standard. In addition, beneficial reductions in non-targeted pollutants resulting from compliance with an independently enforceable applicable requirement may be counted towards PTE provided the emission reduction of the non-targeted pollutant is enforceable as a practical matter and compliance is being met. See the 1995 guidance memo signed by John Seitz, Director of the Office of Air Quality Planning and Standards titled, "Options for Limiting Potential to Emit of a Stationary Source under Section 112 and Title V of the Clean Air Act".

CCI San Juan reported the uncontrolled emission unit-specific PTE in their Part 71 permit application. The Waukesha L5794GSI compressor engine at Barker Creek is equipped with a NSCR, three-way catalytic converter emissions control device. However, the compressor engine is not subject to any applicable regulations or a federally enforceable permit requiring the use of the control device to reduce emissions. The use of the catalytic converter at Barker Creek is not federally enforceable and is voluntary.

The PTE in Table 2 are based on the legally and practically enforceable requirements set forth in this proposed permit, and, for the purposes of the compressor engine, reflect uncontrolled emissions.

Table 2 – Potential-to-Emit With Legally and Practically Enforceable Controls

Regulated Air Pollutants (tpy)											
	NO_X*	**CO***	**VOC***	**PM***	**SO_2***	**CH_2O***	**Total HAPs***	**CO_2***	**CH_4* (as CO_2e)**	**N_2O* (as CO_2e)**	**CO_2e***
C-1101	193.1	146.5	6.0	0.4	0.0	0.67	0.67	4907	2.3	2.8	4912
IEUs	0	0	0.2	0	0	0	0	0	0	0	0
TOTAL	**193.10**	**146.49**	**6.2**	**0.4**	**0.00**	**0.67**	**0.67**	4907	2.3	2.8	4912

*NO_X = nitrogen oxide; CO = carbon monoxide; VOC = volatile organic compound; PM = particulate matter; SO_2 = sulfur dioxide; CH_2O = formaldehyde; HAP = hazardous air pollutant; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = equivalent CO_2;

II. Applicable Requirement Review

The following sections discuss the information provided by CCI San Juan in their Part 71 application, certified to be true and accurate by the Responsible Official of this facility.

A. 40 CFR 52.21 - Prevention of Significant Deterioration

The Prevention of Significant Deterioration (PSD) Permit Program at 40 CFR Part 52 is a preconstruction review requirement of the CAA that applies to proposed projects that are sufficiently large (in terms of emissions) to be a "major" stationary source or "major" modification of an existing stationary source. Source size is defined in terms of "PTE," which is its capability at maximum design capacity to emit a pollutant, except as constrained by existing legally and practically enforceable conditions applicable to the source. A new stationary source or a modification to an existing minor stationary source is major if the proposed project has the PTE any pollutant regulated under the CAA in amounts equal to or exceeding specified major source thresholds, which are 100 tpy for 28 listed industrial source categories and 250 tpy for all other sources. The PSD Permit Program also applies to modifications at existing major sources that cause a "significant net emissions increase" at that source. Significance levels for each pollutant are defined in the PSD regulations at
40 CFR 52.21.

According to the emissions information provided by CCI San Juan in their Part 71 application, Barker Creek is currently a minor source with respect to PSD as the PTE does not exceed the major source thresholds of any criteria pollutants regulated under the PSD Permit Program.

B. 40 CFR Part 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

This subpart establishes requirements for controlling VOC emissions from storage vessels with a capacity greater than or equal to 75 cubic meters that are used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information there are no petroleum storage vessels with capacity greater than 75 cubic meters at Barker Creek. Therefore, the facility is not subject to this subpart.

C. 40 CFR Part 60, Subpart KKK: Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011

This subpart establishes requirements for controlling fugitive VOC emissions from onshore natural gas processing plants. It applies to natural gas processing plants that commenced construction, reconstruction, or modification after January 20, 1984 and on or before August 23, 2011.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information, Barker Creek is not a natural gas processing plant (as defined in the rule). Therefore the facility is not subject to this subpart.

D. 40 CFR Part 60, Subpart LLL: Standards of Performance for SO_2 Emissions From Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011

This subpart applies to sweetening units and sulfur recovery units at onshore natural gas processing facilities. As defined in this subpart, sweetening units are process devices that separate hydrogen sulfide (H_2S) and CO_2 from a sour natural gas stream. Sulfur recovery units are defined as process devices that recover sulfur from the acid gas (consisting of H_2S and CO_2) removed by a sweetening unit.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information, neither sweetening nor sulfur recovery are performed at Barker Creek. Therefore, this facility is not subject to this subpart.

E. 40 CFR Part 60, Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

This subpart establishes emission standards and compliance requirements for the control of emissions from stationary spark ignition internal combustion engines that commenced construction, modification, or reconstruction after June 12, 2006, and are manufactured on or after specified manufacture trigger dates. The manufacture trigger dates are based on the engine type, fuel used, and maximum engine hp.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information, the engine operating at Barker Creek was manufactured prior to the manufacture trigger date in the rule, January 1, 2008. Therefore, this subpart does not apply.

F. 40 CFR Part 60, Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas production, Transmission, and Distribution

This subpart establishes emission standards for the control of VOC and SO_2 emissions from affected facilities that commence construction, modification, or reconstruction after August 23, 2011.

Affected facilities include, but are not limited to well completions, centrifugal compressors, reciprocating compressors, pneumatic controllers, storage vessels, and sweetening units.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information, the current equipment at Barker Creek predates the applicability date for this subpart. Therefore, this facility is not subject to this subpart.

G. 40 CFR Part 63, Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities

This subpart establishes emission standards for the control of HAP emissions from affected units located at natural gas production facilities that process, upgrade, or store natural gas prior to the point of custody transfer, or that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. The affected units are glycol dehydration units, storage vessels with the potential for flash emissions (as defined in the rule) and the group of ancillary equipment and compressors intended to operate in volatile HAP service which are located at natural gas processing plants.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information, Barker Creek does not operate any storage vessels with the potential for flash emissions (as defined in the rule) or Triethylene Glycol (TEG) dehydration units. Therefore, Barker Creek is not subject to this subpart.

H. 40 CFR Part 63, Subpart ZZZZ (MACT ZZZZ): National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

This subpart establishes emission standards and operating limitations for the control of HAP emissions from spark ignition and compression ignition RICE.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information, CCI San Juan is subject to the requirements for non-emergency spark ignition 4-stroke rich-burn, remote existing stationary engines >500 hp, constructed before June 12, 2006 operating at area sources of HAP emissions. The affected unit at Barker Creek is the RICE operating at the facility, Emission Unit C1101.

I. 40 CFR Part 64: Compliance Assurance Monitoring

Pursuant to requirements concerning enhanced monitoring and compliance certification under the CAA, the EPA promulgated regulations to implement compliance assurance monitoring (CAM) for major stationary sources of air pollution, for purposes of Title V permitting that are required to obtain operating permits under Part 71. The rule requires owners or operators of such sources to conduct monitoring that provide a reasonable assurance of compliance with applicable requirements under the CAA. The effective date of this rule is November 21, 1997.

1. CAM Applicability

   According to 40 CFR 64.2(a), CAM applies to <u>each</u> pollutant specific emission unit (PSEU) located at a major source which is required to obtain a Part 71 permit if the unit satisfies all of the following criteria:

(a) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant other than an emissions limitation or standard that is exempt under 40 CFR 64.2(b)(1);

(b) The unit uses a control device to achieve compliance with any such limit or standard; and

(c) The unit has pre-control device emissions of the applicable regulated pollutant that are equal to or greater than 100 percent of the amount, in tpy, required for a source to be classified as a major Title V source.

2. CAM Plan Submittal Deadlines

(a) Large PSEUs. A CAM plan submittal for all PSEUs with the PTE (taking into account control devices) of any one regulated air pollutant in an amount equal to or greater than 100 percent of the amount, in tpy, required for a source to be classified as a major source, is due at the following times:

(i) On or after April 20, 1998, if by that date, a Part 71 application has either:

(A) Not been filed; or
(B) Not yet been determined to be complete.

(ii) On or after April 20, 1998, if a Part 71 permit application for a significant modification is submitted with respect to those PSEUs for which the requested permit revision is applicable; or

(iii) Upon application for a renewed Part 71 permit and a CAM plan has not yet been submitted with an initial or a significant modification application, as specified above.

(b) Other PSEUs. A CAM Plan must be submitted for all PSEUs that are not large PSEUs, but are subject to this rule, upon application for a Part 71 renewal permit.

Based on the information provided by CCI San Juan in their Part 71 application, and our review of that information, there are no PSEUs at Barker Creek that are subject to an emission standard or limitation. Therefore, the facility is not subject to CAM requirements.

J. 40 CFR Part 68: Chemical Accident Prevention Provisions

This rule applies to stationary sources that manufacture, process, use, store, or otherwise handle more than the threshold quantity of a regulated substance in a process. Regulated substances include 77 toxic and 63 flammable substances which are potentially present in the natural gas stream entering the facility and in the storage vessels located at the facility. The quantity of a regulated substance in a process is determined according to the procedures presented under 40 CFR 68.115. 40 CFR 68.115(b)(l) and (2)(i) indicate that toxic and flammable substances in a mixture do not need to be considered when determining whether more than a threshold quantity is present at a stationary source if the concentration of the substance is below one percent by weight of the mixture.

40 CFR 68.115(b)(2)(iii) indicates that prior to entry into a natural gas processing plant, regulated substances in naturally occurring hydrocarbon mixtures need not be considered when determining whether more than a threshold quantity is present at a stationary source. Naturally occurring hydrocarbon mixtures include condensate, field gas, and produced water.

Based on the updated information provided in CCI San Juan's Part 71 application, Barker Creek does not have regulated substances above the threshold quantities in this rule and therefore is not subject to the requirement to develop and submit a risk management plan.

K. 40 CFR Part 71: Emergency Provisions

In this draft Part 71 renewal permit, the EPA is not proposing to include the "Emergency Provisions" located in permit condition III.O. in the existing effective Part 71 permit. These provisions were modeled on the "Emergency provision" contained in the regulations in 40 CFR Part 71 applicable to federal operating permit programs. Specifically, in the regulations discussing the contents of Title V operating permits issued under the federal operating permits program, 40 CFR 71.6(g) provides that certain "emergency" events can constitute "an affirmative defense in an action brought for non-compliance" with certain emission limits contained in the permit, when certain conditions are met. However, nothing in the CAA or 40 CFR Part 71 requires that these types of emergency provisions be included as conditions in operating permits issued by the EPA, and for the reasons discussed below, we are exercising our discretion not to include them in this draft part 71 renewal permit.

In 2014, a federal court ruled that the CAA does not authorize the EPA to create affirmative defense provisions applicable to certain enforcement actions. *See NRDC v. EPA,* 749 F.3d 1055 (D.C. Cir. 2014). The court ruled that Sections 113 and 304 of the CAA preclude the EPA from creating affirmative defense provisions in the Agency's regulations imposing HAP emission limits on sources. The court concluded that those affirmative defense provisions purported to alter the jurisdiction of federal courts generally provided in the CAA to assess liability and impose penalties for violations of emission limits in private civil enforcement cases, and that the CAA did not provide authority for the EPA to do so. Consistent with the reasoning in the *NRDC v. EPA* court decision, the EPA has determined that it is also not appropriate under the CAA to alter the jurisdiction of the federal courts through affirmative defenses provisions in its Title V regulations, such as those contained in the emergency provisions of 40 CFR 71.6(g), and that such provisions are inconsistent with the CAA. In light of the above-described D.C. Circuit Court decision and the EPA's obligation to issue Title V permits consistent with the applicable requirements of the Act, it is no longer appropriate to propose to include permit conditions modeled on affirmative defenses such as those contained in the emergency provisions of 40 CFR 71.6(g) in operating permits issued by the EPA.

Although the EPA views the Part 71 emergency provisions as discretionary (i.e., neither the statute nor the regulations mandate their inclusion in Part 71 permits), the EPA is considering whether to make changes to the Part 71 Permit Program regulations in order to ensure the EPA's regulations are consistent with the recent D.C. Circuit decisions; and if so, how best to make those changes. Until that time, as part of the normal permitting process, it is appropriate for the EPA permitting authorities to rely on the discretionary nature of the existing emergency provisions to choose not to continue to include permit terms modeled on those provisions in Part 71 permits that we are issuing in the first instance or renewing. By doing so, we are not only fulfilling the EPA's obligation to issue Title V permits consistent with the applicable requirements of the Act, but we will also help ensure that permitees do not continue to rely on permit provisions that have been found legally invalid.

Accordingly, in this draft Part 71 renewal permit, the EPA is exercising its discretion to not include the "Emergency Provisions" located in permit condition III.O. in the existing effective Part 71 permit, in order to ensure the Part 71 permit is in compliance with the applicable requirements of the Act.

III. EPA Authority

Title V of the CAA requires that the EPA promulgate, administer, and enforce a federal operating permit program when a state does not submit an approvable program within the time frame set by Title V or does not adequately administer and enforce its EPA approved program. On July 1, 1996 (61 FR 34202), the EPA adopted regulations codified at 40 CFR Part 71 setting forth the procedures and terms under which the agency would administer a federal operating permit program. These regulations were updated on February 19, 1999 (64 FR 8247) to incorporate the EPA's approach for issuing federal operating permits to stationary sources in Indian country.

As described in 40 CFR 71.4(a), the EPA will implement a Part 71 program in areas where a state, local, or tribal agency has not developed an approved Part 70 program. Unlike states, tribes are not required to develop operating permits programs, though the EPA encourages tribes to do so. See, e.g., Indian Tribes: Air Quality Planning and Management (63 FR 7253, February 12, 1998) (also known as the "Tribal Authority Rule"). Therefore, within Indian country, the EPA will administer and enforce a Part 71 federal operating permit program for stationary sources until a tribe receives approval to administer their own operating permit program.

IV. Use of All Credible Evidence

Determinations of deviations, continuous or intermittent compliance status, or violations of the permit are not limited to the testing or monitoring methods required by the underlying regulations or this permit; other credible evidence (including any evidence admissible under the Federal Rules of Evidence) must be considered by the Permittee and the EPA in such determinations.

V. Public Participation

A. Public Notice

As described in 40 CFR 71.11(a)(5), all Part 71 draft operating permits shall be publicly noticed and made available for public comment. The public notice of permit actions and public comment period is described in 40 CFR 71(d).

There will be a 30 day public comment period for actions pertaining to a draft permit. Notification will be given for this draft permit by mailing a copy of the notice to the permit applicant, the affected state, tribal and local air pollution control agencies, the city and county executives, and the state and federal land managers which have jurisdiction over the area where the source is located. A notification will be provided to all persons who have submitted a written request to be included on the mailing list.

If you would like to be added to our mailing list to be informed of future actions on these or other CAA permits issued in Indian country, please send an email using the link for the Ute Mountain Indian Reservation provided at http://www2.epa.gov/region8/air-permit-public-comment-opportunities, or send your name and address to the contact listed below:

Part 71 Permitting Lead
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street (8P-AR)
Denver, Colorado 80202-1129

Public notice will be published in the Farmington Daily Times giving opportunity for public comment on the draft permit and the opportunity to request a public hearing.

B. Opportunity to Comment

Members of the public will be given an opportunity to review a copy of the draft permit prepared by the EPA, the application, this Statement of Basis for the draft permit and all supporting materials for the draft permit. Copies of these documents are available at:

San Juan County Clerk's Office
100 S. Oliver Drive
Aztec, New Mexico 87410

and

Ute Mountain Ute Tribe
Environmental Programs Director
124 Mike Wash Road
Towaoc, CO 81334-0188

and

U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street (8P-AR)
Denver, Colorado 80202-1129

All documents are available for review at the Region 8 office Monday through Friday from 8:00 a.m. to 4:00 p.m. (excluding federal holidays). Electronic copies of the draft permit, statement of basis and permitting record may also be viewed at: http://www2.epa.gov/region8/air-permit-public-comment-opportunities.

Any interested person may submit written comments on the draft Part 71 operating permit during the public comment period to the Part 71 Permitting Lead at the address listed in Section A above, or by email using the instructions on the public comment opportunities web site address listed above. All comments will be considered and answered by the EPA in making the final decision on the permit. The EPA keeps a record of the commenters and of the issues raised during the public participation process.

Anyone, including the applicant, who believes any condition of the draft permit is inappropriate should raise all reasonable ascertainable issues and submit all arguments supporting their position by the close of the public comment period. Any supporting materials submitted must be included in full and may not be incorporated by reference, unless the material has already been submitted as part of the administrative record in the same proceeding or consists of state or federal statutes and regulations, EPA documents of general applicability or other generally available reference material.

The final permit will be a public record that can be obtained upon request. A statement of reasons for changes made to the draft permit and responses to comments received will be sent to all persons who comment on the draft permit. The final permit and response to comments document will also be available online at: http://www2.epa.gov/region8/title-v-operating-permits-issued-region-8.

C. Opportunity to Request a Hearing

A person may submit a written request for a public hearing to the Part 71 Permitting Lead, U.S. EPA Region 8, by stating the nature of the issues to be raised at the public hearing. Based on the number of hearing requests received, the EPA will hold a public hearing whenever it finds there is a significant degree of public interest in a draft operating permit. The EPA will provide public notice of the public hearing. If a public hearing is held, any person may submit oral or written statements and data concerning the draft permit.

D. Appeal of Permits

Within 30 days after the issuance of a final permit decision, any person who filed comments on the draft permit or participated in the public hearing may petition to the Environmental Appeals Board (EAB) to review any condition of the permit decision. Any person who failed to file comments or participate in the public hearing may petition for administrative review, only if the changes from the draft to the final permit decision or other new grounds were not reasonably foreseeable during the public comment period. The 30-day period to appeal a permit begins with the EPA's service of the notice of the final permit decision.

The petition to appeal a permit must include a statement of the reasons supporting the review, a demonstration that any issues were raised during the public comment period, a demonstration that it was impracticable to raise the objections within the public comment period, or that the grounds for such objections arose after such a period. When appropriate, the petition may include a showing that the condition in question is based on a finding of fact or conclusion of law which is clearly erroneous; or, an exercise of discretion, or an important policy consideration that the EAB should review.

The EAB will issue an order either granting or denying the petition for review, within a reasonable time following the filing of the petition. Public notice of the grant of review will establish a briefing schedule for the appeal and state that any interested person may file an amicus brief. Notice of denial of review will be sent only to the permit applicant and to the person requesting the review. To the extent review is denied, the conditions of the final permit decision become final agency action.

A motion to reconsider a final order shall be filed within ten days after the service of the final order. Every motion must set forth the matters claimed to have been erroneously decided and the nature of the alleged errors. Motions for reconsideration shall be directed to the Administrator rather than the EAB. A motion for reconsideration shall not stay the effective date of the final order unless it is specifically ordered by the EAB.

E. Petition to Reopen a Permit for Cause

Any interested person may petition the EPA to reopen a permit for cause, and the EPA may commence a permit reopening on its own initiative.

The EPA will only revise, revoke and reissue, or terminate a permit for the reasons specified in 40 CFR 71.7(f) or 71.6(a)(6)(i). All requests must be in writing and must contain facts or reasons supporting the request. If the EPA decides the request is not justified, it will send the requester a brief written response giving a reason for the decision. Denial of these requests is not subject to public notice, comment, or hearings. Denials can be informally appealed to the EAB by a letter briefly setting forth the relevant facts.

United States Environmental Protection Agency
Region 8
Air Program
1595 Wynkoop Street
Denver, Colorado 80202

Air Pollution Control Permit to Operate
Title V Operating Permit Program at 40 CFR Part 71

In accordance with the provisions of Title V of the Clean Air Act (CAA) and the Title V Operating Permit Program at 40 CFR Part 71 (Part 71) and applicable rules and regulations,

Castleton Commodities Incorporated San Juan, LLC
Barker Creek Compressor Station

is authorized to operate air emission units and to conduct other air pollutant emitting activities in accordance with the permit conditions listed in this permit.

This source is authorized to operate at the following location:

Ute Mountain Ute Indian Reservation
Latitude 36.93056 N, Longitude -108.28056 W
San Juan County, New Mexico

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations. All terms and conditions of the permit are enforceable by the EPA and citizens under the CAA.

Carl Daly, Director
Air Program
U.S. EPA Region 8

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Air Pollution Control Permit to Operate
Title V Operating Permit Program at 40 CFR Part 71

Castleton Commodities Incorporated San Juan, LLC
(CCI San Juan)
Barker Creek Compressor Station

Permit Number: V-UM-000001-2014.00
Replaces Permit No.: V-UM-0001-09.00

Issue Date: TBD
Effective Date: TBD
Expiration Date: TBD

The permit number cited above should be referenced in future correspondence regarding this facility.

Table 1. Part 71 Permitting History

Date of Action	Permit Number	Type of Action	Description of Action
March 2010	V-UM-0001-09.00	Initial Permit	N/A
TBD	V-UM-000001-2014.00	Permit Renewal	Includes Change of Ownership

Table of Contents

I. Facility Information and Emission Unit Identification

A. Facility Information

Parent Company Name:	Castleton Commodities Incorporated San Juan, LLC
Plant Operator & Name:	Barker Creek Compressor Station
Plant Location:	Latitude 36.93056 N, Longitude -108.28056 W
Region:	8
State:	New Mexico
County:	San Juan
Reservation:	Ute Mountain Indian Reservation
Tribe:	Ute Mountain Ute Indian Tribe
Responsible Official:	Vice President/General Manager – CCI San Juan, LLC
SIC Code:	1311

Description:

Barker Creek is a natural gas compressor station located in northwestern New Mexico within the exterior boundaries of the Ute Mountain Indian Reservation. The facility began operations in 2003 to provide field compression for natural gas wells.

The inlet gas and any associated pipeline liquids entering the compressor station pass through a horizontal separator (not a Joule-Thompson or dewpoint skid) where gas is separated and routed to the inlet of the compressor. Pipeline liquids are primarily water and are routed as a single stage to offsite storage not owned or operated by CCI San Juan. In the event any associated condensate is entrained with the water, flashing emissions are routed along with the gas to the inlet of the compressor. The separator is not an emissions source, hence no flashing emissions occur. No other equipment is connected with the separator, except the gas inlet, gas outlet, and liquids outlet piping and associated connections. The compressor engine at Barker Creek is a Waukesha L5794GSI reciprocating internal combustion engine (RICE) fueled by natural gas and using rich burn technology. CCI San Juan voluntarily operates a non-selective catalytic reduction (NSCR) emission control system on the compressor engine, as the engine is not subject to any federally enforceable requirements mandating its use.

B. Facility Emission Points

Table 2 – Emission Units and Emission Generating Activities

Unit I.D.	Description	Control Equipment
C-11101	Waukesha L5794GSI 4-stroke rich-burn (4SRB) stationary RICE, 1,380 hp, 3.51 MMBtu/hr, natural gas-fired: Serial No. C-1442/1 Installed: 8/26/2003 Mfg:[prior to June 12, 2006]	NSCR 3-Way Converter (not enforceable)
IEU	Process fugitives (fugitive emissions from gas valves, light liquid valves, relief valves, liquid flanges, open-ended lines, compressor seals, pump seals, and gas flanges)	

* Mfg = Manufactured; hp = horsepower; MMBtu/hr = million British thermal units per hour.

II. National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines - 40 CFR Part 63, Subpart ZZZZ

A. Applicability [40 CFR 63.6585]

40 CFR Part 63, Subpart ZZZZ applies to the following emission unit identified as C-11101 in Table 2 of this permit;

B. General Provisions [40 CFR 63.6665]

1. The General Provisions at 40 CFR Part 63, Subpart A apply as specified in Table 8 of 40 CFR Part 63, Subpart ZZZZ. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart A.

2. All reports required under 40 CFR Part 63, Subpart A shall be sent to the EPA at the following address as listed in 40 CFR 63.13:

   Director, Air and Toxics Technical Enforcement Program, 8ENF–AT
   Office of Enforcement, Compliance and Environmental Justice
   1595 Wynkoop Street, Denver, CO 80202–1129

C. Maintenance Requirements [40 CFR 63.6603 and 63.6605]

1. The Permittee must comply with the maintenance requirements that apply to existing non-emergency spark ignition 4SRB stationary RICE with a site rating of more than 500 hp located at area sources of hazardous air pollutants (HAP) that are remote stationary RICE at 40 CFR 63.6603(a) and Table 2d 40 CFR Part 63, Subpart ZZZZ.

2. Pursuant to 40 CFR 63.6603(f), the Permittee must evaluate and document that the engine meets the definition of remote stationary RICE in 40 CFR 63.6675. If an evaluation indicates that the stationary RICE no longer meets the definition of remote stationary RICE in 40 CFR 63.6675, the Permittee must comply with all of the requirements for existing non-emergency spark ignition

4SRB stationary RICE with a site rating of more than 500 hp located at area sources of HAP that are not remote stationary RICE within 1 year of the evaluation.

3. The Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if the required levels have been achieved. Determination of whether such operations and maintenance procedures are being used will be based on information available to the EPA, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.6605(b)]

D. Continuous Compliance Requirements [40 CFR 63.6640]

1. The Permittee must demonstrate continuous compliance with maintenance requirements that apply to existing non-emergency 4SRB stationary RICE >500 HP located at an area source of HAP that are remote stationary RICE according to 40 CFR 63.6640 and Table 6 of 40 CFR Part 63, Subpart ZZZZ.

E. Notifications, Reports, and Records [40 CFR 63.6645, 63.6650, 63.6655, 63.6660]

1. The Permittee must submit notifications as specified in 40 CFR 63.6645.

2. The Permittee must submit reports as specified in 40 CFR 63.6650.

3. The Permittee must keep records as specified in 40 CFR 63.6655.

4. The Permittee must keep the records in the format and for the duration as specified in 40 CFR 63.6660.

III. Facility-Wide Requirements [40 CFR 71.6(a)(1)]

Conditions in this section of this permit apply to all emissions units located at the source, including any units not specifically listed in Table 2 of the Facility Emission Points section of this permit.

A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]

The Permittee shall comply with the following generally applicable recordkeeping requirements:

1. If the Permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more HAPs is not subject to a relevant standard or other requirement established under 40 CFR Part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the

source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). [40 CFR 63.10(b)(3)]

2. Records shall be kept of off permit changes, as required by the Off Permit Changes section of this permit.

B. Reporting Requirements [40 CFR 71.6(a)(3)(iii)]

1. The Permittee shall submit to the EPA all reports of any required monitoring under this permit semiannually. The first report shall cover the period from the effective date of this permit through December 31st, 2014. Thereafter, the report shall be submitted semi-annually, by April 1st and October 1st of each year. The report due on April 1st shall cover the 6 month period ending on the last day of December before the report is due. The report due on October 1st shall cover the 6 month period ending on the last day of June before the report is due. All instances of deviations from permit requirements shall be clearly identified in such reports. All required reports shall be certified by a responsible official consistent with the Submissions section of this permit.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "SIXMON" for 6 month monitoring reports. The form may be found on EPA's website at: http://www.epa.gov/air/oaqps/permits/p71forms.html.]

2. "Deviation" means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with 40 CFR 71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

   (a) A situation where emissions exceed an emission limitation or standard;

   (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or

   (c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.

3. The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" is defined as follows:

(a) Any definition of "prompt" or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.

(b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

(i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than 2 hours in excess of permit requirements, the report must be made within 48 hours.

(iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.

(c) If any of the conditions in (i) or (ii) of paragraph (b) above are met, the Permittee must notify EPA by telephone (1-800-227-6312), facsimile (303-312-6409), or by email to r8airreportenforcement@epa.gov based on the timetables listed above. *[Notification must specify that this notification is a deviation report for a Part 71 permit].* A written notice, certified consistent with the Submissions section of this permit must be submitted within 10 working days of the occurrence. All deviations reported under this section must also be identified in the 6-month report required under Condition 1 in this section of this permit.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "PDR" for prompt deviation reporting. The form may be found on the EPA's website at: http://www.epa.gov/air/oaqps/permits/p71forms.html]

IV. General Provisions

A. Annual Fee Payment [40 CFR 71.9]

1. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below.

2. The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year.

3. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency.

4. The Permittee shall send fee payment and a completed fee filing form to:

For regular U.S. Postal Service mail express mail	**For non-U.S. Postal Service** (FedEx, Airborne, DHL, and UPS)
U.S. Environmental Protection Agency FOIA and Miscellaneous Payments Cincinnati Finance Center Payments P.O. Box 979078 St. Louis, MO 63197-9000	U.S. Bank Government Lockbox 979078 U.S. EPA FOIA & Misc. 1005 Convention Plaza SL-MO-C2-GL St. Louis, MO 63101

5. The Permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by the same deadline as required for fee payment to the address listed in the Submissions section of this permit.

   [Explanatory note: The fee filing form "FF" and the fee calculation worksheet form "FEE" may be found on the EPA website at: http://www.epa.gov/air/oaqps/permits/p71forms.html]

6. Basis for calculating annual fee:

   (a) The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all "regulated pollutants (for fee calculation)" emitted from the source by the presumptive emissions fee (in dollars per ton) in effect at the time of calculation.

      (i) "Actual emissions" means the actual rate of emissions in tpy of any regulated pollutant (for fee calculation) emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit's actual operating hours, production rates, in-place control equipment, and types

of materials processed, stored, or combusted during the preceding calendar year.

(ii) Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.

(iii) If actual emissions cannot be determined using the compliance methods in the permit, the Permittee shall use other federally recognized procedures.

[Explanatory note: The presumptive fee amount is revised each calendar year to account for inflation, and it is available from the EPA prior to the start of each calendar year.]

(b) The Permittee shall exclude the following emissions from the calculation of fees:

(i) The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tpy;

(ii) Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and

(iii) The quantity of actual emissions (for fee calculation) of insignificant activities [defined in §71.5(c)(11)(i)] or of insignificant emissions levels from emissions at the source identified in the Permittee's application pursuant to §71.5(c)(11)(ii).

7. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official.

[Explanatory note: The fee calculation worksheet form already incorporates a section to help you meet this responsibility.]

8. The Permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for 5 years following submittal of fee payment. [Emission-related data include, for example, emissions-related forms provided by the EPA and used by the Permittee for fee calculation purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with §71.6(a)(3)(ii).]

9. Failure of the Permittee to pay fees in a timely manner shall subject the Permittee to assessment of penalties and interest in accordance with §71.9(l).

10. When notified by the EPA of underpayment of fees, the Permittee shall remit full payment within 30 days of receipt of notification.

11. A Permittee who thinks an EPA-assessed fee is in error and who wishes to challenge such fee, shall provide a written explanation of the alleged error to the EPA along with full payment of the EPA assessed fee.

B. Annual Emissions Inventory [40 CFR 71.9(h)(1)and (2)]

1. The Permittee shall submit an annual emissions report of its actual emissions for both criteria pollutants and regulated HAPs for this source for the preceding calendar year for fee assessment purposes. The annual emissions report shall be certified by a responsible official and shall be submitted each year to the EPA by April 1st.

2. The annual emissions report shall be submitted to the EPA at the address listed in the Submissions section of this permit.

[Explanatory note: An annual emissions report, required at the same time as the fee calculation worksheet by §71.9(h), has been incorporated into the fee calculation worksheet form as a convenience.]

C. Compliance Requirements [40 CFR 71.6(a)(6), Section 113(a) and 113(e)(1) of the CAA, and 40 CFR 51.212, 52.12, 52.33, 60.11(g), 61.12]

1. Compliance with the Permit

   (a) The Permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance constitutes a violation of the CAA and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

   (b) It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

   (c) For the purpose of submitting compliance certifications in accordance with §71.6(c)(5), or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

2. Compliance Schedule [40 CFR 71.5(c)(8)(iii)]

   (a) For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.

   (b) For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

3. Compliance Certifications [40 CFR 71.6(c)(5)]

   (a) The Permittee shall submit to the EPA a certification of compliance with permit terms and conditions, including emission limitations,

standards, or work practices annually by April 1st, and shall cover the same 12-month period as the two consecutive semi-annual monitoring reports.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a reporting form for annual compliance certifications. The form may be found on EPA website at: http://www.epa.gov/air/oaqps/permits/p71forms.html]

(b) The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR 71.5(d).

(c) The certification shall include the following:

(i) Identification of each permit term or condition that is the basis of the certification;

(ii) The identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in this permit. If necessary, the Permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information;

(iii) The status of compliance with each term and condition of the permit for the period covered by the certification based on the method or means designated in (ii) above. The certification shall identify each deviation and take it into account in the compliance certification;

(iv) Such other facts as the EPA may require to determine the compliance status of the source; and

(v) Whether compliance with each permit term was continuous or intermittent.

D. Duty to Provide and Supplement Information
[40 CFR 71.6(a)(6)(v), 71.5(a)(3), and 71.5(b)]

1. The Permittee shall furnish to the EPA, within a reasonable time, any information that EPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential must be accompanied by a claim of confidentiality according to the provisions of 40 CFR Part 2, Subpart B.

2. The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly

submit such supplementary facts or corrected information. In addition, a Permittee shall provide additional information as necessary to address any requirements that become applicable after the date a complete application is filed, but prior to release of a draft permit.

E. Submissions [40 CFR 71.5(d), 71.6(c)(1) and 71.9(h)(2)]

1. Any document (application form, report, compliance certification, etc.) required to be submitted under this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Explanatory note: the EPA has developed a reporting form "CTAC" for certifying truth, accuracy and completeness of Part 71 submissions. The form may be found on EPA website at: http://www.epa.gov/air/oaqps/permits/p71forms.html]

2. All fee calculation worksheets and applications for renewals and permit modifications shall be submitted to:

Part 71 Permit Contact, Air Program, 8P-AR
U.S. Environmental Protection Agency,
1595 Wynkoop Street
Denver, Colorado 80202

3. Except where otherwise specified, all reports, test data, monitoring data, notifications, and compliance certifications shall be submitted to:

Director, Air Toxics and Technical Enforcement Program, 8ENF-AT
U.S. Environmental Protection Agency,
1595 Wynkoop Street
Denver, Colorado 80202

F. Severability Clause [40 CFR 71.6(a)(5)]

The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

G. Permit Actions [40 CFR 71.6(a)(6)(iii)]

This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

H. Administrative Permit Amendments [40 CFR 71.7(d)]

The Permittee may request the use of administrative permit amendment procedures for a permit revision that:

1. Corrects typographical errors;

2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

3. Requires more frequent monitoring or reporting by the Permittee;

4. Allows for a change in ownership or operational control of a source where the EPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA;

5. Incorporates into the Part 71 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of 40 CFR 71.7 and 71.8 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in 40 CFR 71.6; or

6. Incorporates any other type of change which EPA has determined to be similar to those listed in (1) through (5) above.

[Note to Permittee: If 1 through 5 above do not apply, please contact the EPA for a determination of similarity prior to submitting your request for an administrative permit amendment under this provision.]

I. Minor Permit Modifications [40 CFR 71.7(e)(1)]

1. The Permittee may request the use of minor permit modification procedures only for those modifications that:

   (a) Do not violate any applicable requirement;

   (b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

   (c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

   (d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

(i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I; and

(ii) An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA;

(e) Are not modifications under any provision of Title I of the CAA; and

(f) Are not required to be processed as a significant modification.

2. Notwithstanding the list of changes ineligible for minor permit modification procedures in 1 above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by EPA.

3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR 71.5(c) and shall include the following:

(a) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

(b) The source's suggested draft permit;

(c) Certification by a responsible official, consistent with 40 CFR 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

(d) Completed forms for the permitting authority to use to notify affected States as required under 40 CFR 71.8.

4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

5. The permit shield under 40 CFR 71.6(f) may not extend to minor permit modifications.

J. Significant Permit Modifications [40 CFR 71.7(e)(3), 71.8(d), and 71.5(a)(2)]

1. The Permittee must request the use of significant permit modification procedures for those modifications that:

   (a) Do not qualify as minor permit modifications or as administrative amendments;

   (b) Are significant changes in existing monitoring permit terms or conditions; or

   (c) Are relaxations of reporting or recordkeeping permit terms or conditions.

2. Nothing herein shall be construed to preclude the Permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.

3. Permittees must meet all requirements of Part 71 for applications, public participation, and review by affected states and tribes for significant permit modifications. For the application to be determined complete, the Permittee must supply all information that is required by 40 CFR 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change.

K. Reopening for Cause [40 CFR 71.7(f)]

The permit may be reopened and revised prior to expiration under any of the following circumstances:

1. Additional applicable requirements under the CAA become applicable to a major Part 71 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 71.7(c)(3);

2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;

3. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

4. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

L. Property Rights [40 CFR 71.6(a)(6)(iv)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

M. Inspection and Entry [40 CFR 71.6(c)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the EPA or an authorized representative to perform the following:

2. Enter upon the Permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

3. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

4. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

5. As authorized by the CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

N. Emergency Provisions [40 CFR 71.6(g)]

1. In addition to any emergency or upset provision contained in any applicable requirement, the Permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the Permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

   (a) An emergency occurred and that the Permittee can identify the cause(s) of the emergency;

   (b) The permitted source was at the time being properly operated;

   (c) During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and

   (d) The Permittee submitted notice of the emergency to the EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective

actions taken. This notice fulfills the requirements for prompt notification of deviations.

2. In any enforcement proceedings the Permittee attempting to establish the occurrence of an emergency has the burden of proof.

3. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

O. Transfer of Ownership or Operation [40 CFR 71.7(d)(1)(iv)]

A change in ownership or operational control of this source may be treated as an administrative permit amendment if the EPA determines no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA.

P. Off Permit Changes [40 CFR 71.6(a)(12) and 40 CFR 71.6(a)(3)(ii)]

The Permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met, and that all records required by this section are kept for a period of 5 years:

1. Each change is not addressed or prohibited by this permit;

2. Each change shall meet with all applicable requirements and shall not violate any existing permit term or condition;

3. Changes under this provision may not include changes subject to any requirement of 40 CFR Parts 72 through 78 or modifications under any provision of Title I of the CAA;

4. The Permittee must provide contemporaneous written notice to the EPA of each change, except for changes that qualify as insignificant activities under 40 CFR 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;

5. The permit shield does not apply to changes made under this provision;

6. The Permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes;

7. The notice shall be kept on site and made available to the EPA on request, in accordance with the general recordkeeping provision of this permit; and

8. Submittal of the written notice required above shall not constitute a waiver, exemption, or shield from applicability of any applicable standard or PSD permitting requirements under 40 CFR 52.21 that would be triggered by the change.

Q. Permit Expiration and Renewal [40 CFR 71.5(a)(1)(iii), 71.5(a)(2), 71.5(c)(5), 71.6(a)(11), 71.7(b), 71.7(c)(1), and 71.7(c)(3)]

1. This permit shall expire upon the earlier occurrence of the following events:

   (a) Five (5) years elapse from the date of issuance; or

   (b) The source is issued a Part 70 or Part 71 permit under an EPA-approved or delegated permit program.

2. Expiration of this permit terminates the Permittee's right to operate unless a timely and complete permit renewal application has been submitted at least 6 months but not more than 18 months prior to the date of expiration of this permit.

3. If the Permittee submits a timely and complete permit application for renewal, consistent with 40 CFR 71.5(a)(2), but the EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR 71.6(f) shall remain in effect until the renewal permit has been issued or denied.

4. The Permittee's failure to have a Part 71 permit is not a violation of this part until the EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by the EPA.

5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected State, and tribal review.

6. The application for renewal shall include the current permit number, description of permit revisions and off permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

V-UM-0001-2009.01
Admin Amend

CCI San Juan LLC
811 Main Street, Suite 3500
Houston, TX 77002-6225

281-378-1100 - O
281-378-1250 - F

May 20, 2014

USEPA, Region 8
1595 Wynkoop Street
Mail Code: 8P-AR
Denver, CO 80202-1129

RE: Change of Ownership/Name for Barker Creek Compressor Station
Title V Permit Number V-UM-0001-09.00

Dear Environmental Protection Agency:

Please find enclosed an Ownership Change/Company Name Change Notification in reference to the above facility and permit number. As a result of a recent sale of May 1, 2014, this Compressor Station has changed names from Western Gas Resources Asset Holding Co., LLC to CCI San Juan LLC.

In addition, the new Responsible Official (RO) and Alternate Designated Representative (ADR) for certification of the Title V documents are the following individuals:

RO: Brad Burmaster – VP/GM
CCI San Juan LLC
811 Main Street, Suite 3500
Houston, TX 77002
281-378-1100
brad.burmaster@cci.com

ADR: Joseph Rothbauer – Senior VP
CCI San Juan LLC
811 Main Street, Suite 3500
Houston, TX 77002
281-378-1100
joe.rothbauer@cci.com

If you have any questions or require additional information, please contact Leann Plagens at (281) 378-1257 or leann.plagens@cci.com.

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.

Sincerely,

Brad Burmaster
Vice President/General Manager
CCI San Juan LLC

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

GENERAL INFORMATION AND SUMMARY (GIS)

A. Mailing Address and Contact Information

Facility name Barker Creek Compressor Station

Mailing address: Street or P.O. Box 811 Main Street, Suite 3500

City Houston State TX ZIP 77002-

Contact person: Ryan Kelly Title Safety Specialist

Telephone (505) 598 - 5601 Ext.

Facsimile (505) 598 - 6210

B. Facility Location

Temporary source? ___Yes X No Plant site location NW 1/4 Section 2, T32N, R14W, San Juan County, New Mexico

City Kirtland State NM County San Juan EPA Region 8

Is the facility located within:

Indian lands? X YES ___ NO OCS waters? ___YES X NO

Non-attainment area? _____ YES X NO If yes, for what air pollutants? N/A

Within 50 miles of affected State? X YES ___NO If yes, What State(s)? CO, AZ, & UT

C. Owner

Name CCI San Juan LLC Street/P.O. Box 811 Main Street, Suite 3500

City Houston State TX ZIP 77002 -

Telephone (281) 378 - 1100 Ext

D. Operator

Name CCI San Juan LLC Street/P.O. Box 99 County Road 6500

City Kirtland State NM ZIP 87417 -

Telephone (505) 598 - 5601 Ext

E. Application Type

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

___Initial Permit ___ Renewal ___ Significant Mod ___ Minor Permit Mod(MPM)

___ Group Processing, MPM _X_ Administrative Amendment

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

For permit renewal, what is the expiration date of current permit? _____/____/_____

F. Applicable Requirement Summary

Mark all types of applicable requirements that apply.

___ SIP ___ FIP/TIP ___ PSD ___Non-attainment 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 requirements, sec. 183(f)) ___ Section 129 Standards/Requirement

___ Consumer / comm.. products, ' 183(e) ___ NAAQS, increments or visibility (temp. sources)

Has a risk management plan been registered? ___YES ___NO Regulatory agency _____

Phase II acid rain application submitted? ___YES ___NO If yes, Permitting authority _____

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

Cite and describe any emissions-limiting requirements and/or facility-wide "generic" applicable requirements.

Form submitted as an Amendment on change of Ownership.

H. Process Description

List processes, products, and SIC codes for the facility.

Process	Products	SIC
Natural gas compressor station – separates gases and liquids, routes gas to pipeline via compressor	Residue gas (to pipeline), produced water, liquids	1311

I. Emission Unit Identification

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

Emissions Unit ID	Description of Unit
C-1101	Waukesha L5794GSI rich burn compressor engine, 1,380 bhp, 3.51 MMBtu/hr, natural gas fired: Serial No. C-1442/1 Installed 8/26/2003
	Control equipment for C-1101: Catalytic Convertor (not enforceable)

J. Facility Emissions Summary

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 193.10 tons/yr VOC 6.19 tons/yr SO2 0.0 tons/yr

PM-10 0 tons/yr CO 146.49 tons/yr Lead 0 tons/yr

Total HAP 0.67 tons/yr

Single HAP emitted in the greatest amount Formaldehyde PTE 0.67 tons/yr

Total of regulated pollutants (for fee calculation), Sec. F, line 5 of form FEE 346.5 tons/yr

K. Existing Federally-Enforceable Permits

Permit number(s) V-UM-0001-0.900 Permit type Operating Permitting authority US EPA

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

L. Emission Unit(s) Covered by General Permits

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 X NO (If yes, see instructions)

INSTRUCTIONS FOLLOW

From:	Okubo, Noreen
To:	sclow@utemountain.org; lnez@utemountaintribe.com; tnatori@utemountain.org; EPOJAT@yahoo.com; mzking@navajo-nsn.gov; mhutson@southernute-nsn.gov
Cc:	Okubo, Noreen
Subject:	Draft Title V Operating Permit on the Ute Mountain Ute Indian Reservation
Date:	Monday, July 13, 2015 4:15:45 PM

In accordance with the regulations at 40 CFR 71.11(d), the EPA is hereby providing notification of the availability for public comment of the draft Clean Air Act Title V operating permit for the following source located on the Ute Mountain Ute Indian Reservation:

Castleton Commodities Incorporated San Juan, LLC
Barker Creek Compressor Station

Electronic copies of the draft permit, Statement of Basis and supporting permit record maybe viewed online at : http://www2.epa.gov/region8/air-permit-public-comment-opportunities

Paper copies of the draft permit, Statement of Basis, and supporting permit docket may be obtained by contacting the Federal and/or Tribal contacts identified on the attached public notice bulletin.

Comments may be sent by mail to:
US EPA Region 8
Air Program Office
1595 Wynkoop Street 8P-AR
Denver CO 80202

Or electronically to R8AirPermitting@epa.gov

In accordance with the regulations at 40 CFR Part 71.11(d), the Agency is providing a 30-day period from July 13, 2015 to August 12, 2015 for public comment on this draft permit. Comments must be received by 5:00 pm MST August 12, 2015 to be considered in the issuance of the final permit. If a public hearing is held regarding this permit, you will be sent a copy of the public hearing notice at least 30 days in advance of the hearing date.

Thank you

From:	Okubo, Noreen
To:	MBDurrant@hollandhart.com; Shepherd, Don; David.Higginson@zionsbank.com
Cc:	Okubo, Noreen
Subject:	Notice of Public Comment Period-Draft Title V Operating Permit on the Ute Mountain Ute Indian Reservation
Date:	Monday, July 13, 2015 4:24:10 PM

In accordance with the regulations at 40 CFR 71.11(d), the EPA is hereby providing notification of the availability for public comment of the draft Clean Air Act Title V operating permit for the following source located on the Southern Ute Indian Reservation:

Castleton Commodities Inc San Juan LLC
Barker Creek Compressor Station

Electronic copies of the draft permit, Statement of Basis and supporting permit record maybe viewed online at : http://www2.epa.gov/region8/air-permit-public-comment-opportunities

Paper copies of the draft permit, Statement of Basis, and supporting permit docket may be obtained by contacting the Federal and/or Tribal contacts identified on the attached public notice bulletin.

Comments may be sent by mail to:
US EPA Region 8
Air Program Office
1595 Wynkoop Street 8P-AR
Denver CO 80202

Or electronically to R8AirPermitting@epa.gov

In accordance with the regulations at 40 CFR Part 71.11(d), the Agency is providing a 30-day period from July 13, 2015 to August 12, 2015 for public comment on this draft permit. Comments must be received by 5:00 pm MST August 12, 2015 to be considered in the issuance of the final permit. If a public hearing is held regarding this permit, you will be sent a copy of the public hearing notice at least 30 days in advance of the hearing date.

Thank you

Public Notice: Request For Comments

Proposed Air Quality Operating Permit for Federal Clean Air Act Title V to Control Air Pollutant Emissions from Barker Creek Compressor Station on the Ute Mountain Ute Indian Reservation

Public notice issued:
July 13, 2015

Written comments due:

5 p.m., August 12, 2015

For further information, contact:

Noreen Okubo, U.S. EPA Region 8

What is being proposed?

EPA proposes to issue a Clean Air Act (CAA), 40 Code of Federal Register, Part 71, Title V Operating Permit for the Barker Creek compressor station on the Ute Mountain Ute Indian Reservation.

Castleton Commodities Inc. San Juan LLC
Barker Creek Compressor Station
811 Main Street
Houston TX 77002

EPA issues CAA Title V operating permits in Indian country where EPA has not approved a tribe to implement the Title V operating permit program. The Ute Mountain Ute Indian Reservation does not have an approved Title V operating permit program.

Air pollutant emissions come from the compressor engine. The draft operating permit includes requirements for air pollutant emissions control.

Permit number:
V-UM-000001-2014.00

Draft CAA Title V Operating Permit
Ute Mountain Ute Indian Reservation

U. S. Environmental Protection Agency
Region 8
Air Program

1595 Wynkoop Street
Denver CO 80202

800.227.8917

You can review the draft CAA Title V Operating Permit, the application, and Statement of Basis at:

San Juan County Clerk Office
100 South Oliver Drive
Aztec, NM 87410

Ute Mountain Ute Tribe
Environmental Programs Office
124 Mike Wash Road
Towaoc, CO 81334
970-565-3751

U.S. EPA Region 8
Air Program Office (8P-AR)
1595 Wynkoop St.
Denver, CO 80202
Phone: 303-312-6646

All documents will be available for review at the U.S. EPA Region 8 office Monday through Friday from 8:00 am to 4:00 pm (excluding Federal holidays).

Electronic copies of the proposed Title V permit, Statement of Basis and all supporting materials may also be viewed at: http://www2.epa.gov/region8/air-permit-public-comment-opportunities

What are EPA's responsibilities?

The U.S. EPA Region 8 Air Program is the regulatory agency that helps protect and preserve air quality on the Ute Mountain Ute Indian Reservation. One way EPA does this is by issuing CAA Title V operating permits for major air emission sources that require air pollutant emissions control and monitoring. The purpose of this notice is to invite you to submit written comments on this proposed permit through the process detailed in this notice.

What happens next?

EPA will review and consider all comments received during the comment period.

Following this review, EPA may issue the permit, issue with revisions, or deny the permit.

Public Comment Period:

The EPA will accept written comments on this draft Title V Operating Permit beginning:

July 13, 2015 through 5 p.m. August 12, 2015.

Where can I send written comments?

EPA accepts comments by mail, fax and e-mail.

How can I make comments by e-mail?

To make comments via e-mail, click on the name of the contact person at the website below.

U.S. EPA
Region 8 Air Program
8P-AR
Tribal Permit Program
1595 Wynkoop Street
Denver CO 80202
Fax: 303-312-6064

http://www2.epa.gov/region8/air-permit-public-comment-opportunities

From: Okubo, Noreen
To: brad.burmaster@cci.com
Cc: leann.plagens@cci.com; Cudney-Black, Jane
Subject: Draft Title V Operating Permit for Barker Creek Compressor Station
Date: Monday, July 13, 2015 3:53:34 PM
Attachments: CCISanJuan-Barker Creek Draft Permit V-UM-000001-2014.00docket.pdf
CCISanJuan-Barker Creek Draft SOB V-UM-000001-2014.00 docket.pdf
T5 Public Notice Barker Creek V-UM-000001-2014.00.pdf

I have attached the requested draft permit, the accompanying Statement of Basis and the public notice for the Barker Creek Compressor Station. We are posting the application, draft permit, Statement of Basis and other supporting information in PDF format on our website at: http://www2.epa.gov/region8/air-permit-public-comment-opportunities by the start of the public comment period.

In accordance with the regulations at 40 CFR 71.11(d), we are providing a 30-day period from July 13, 2015 to August 12, 2015 for public comment on this draft permit. Comments must be received by 5:00 pm MST August 12, 2015, to be considered in the issuance of the final permit.

Please submit any written comments you may have concerning the terms and conditions of this permit. You can send them directly to me at Okubo.noreen@epa.gov or to r8permitting@epa.gov. Should the EPA not accept any or all of these comments, you will be notified in writing and will be provided with the reasons for not accepting them.

Thank you

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08

JUL 6 2015

Ref: 8P-AR

Brad Burmaster
Vice President/General Manager
CCI San Juan, LLC
811 Main Street, Suite 3500
Houston, TX 77002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Draft Part 71 Operating Permit
Title V Permit #V-UM-000001-2014.00
CCI San Juan, LLC
Barker Creek Compressor Station

Dear Mr. Burmaster:

The Environmental Protection Agency, Region 8, has completed its review of Castleton Commodities Incorporated San Juan, LLC's (CCI San Juan) application for the Barker Creek Compressor Station to obtain a renewal Title V operating permit pursuant to 40 CFR Part 71 (Part 71). The EPA received the application on October 2, 2014.

Enclosed you will find the draft Part 71 operating permit and the corresponding Statement of Basis. The regulations at 40 CFR 71.11(d) require that an applicant, the public and affected states have the opportunity to submit written comments on any draft Part 71 operating permit. All written comments submitted within 30 calendar days after the public notice is published will be considered by the agency in making its final permit decision. Public notice will be published in the Farmington Daily Times on Monday, July 13, 2015. The public comment period will end on Wednesday, August 12, 2015.

The conditions contained in the permit will become effective and enforceable by the agency if the permit is issued final. If you are unable to accept any term or condition of the draft permit, please submit your written comments, along with the reason(s) for non-acceptance to:

Part 71 Permitting Lead
U.S. EPA, Region 8
Air Program (8P-AR)
1595 Wynkoop Street
Denver, Colorado 80202

If you have any questions concerning the enclosed draft permit or Statement of Basis, please contact Noreen Okubo of my staff at (303) 312-6646.

Sincerely,

Carl Daly, Director
Air Program

Enclosures (2)

cc: Honorable Manuel Heart, Ute Mountain Ute Tribe, Chairman
Scott Clow, Ute Mountain Ute Tribe, Environmental Director
Leann Plagens, CCI San Juan LLC, Vice President Environment, Safety, Health, & Regulatory Compliance
Jane Cudney-Black, Weston Solutions Inc, Senior Project Manager

United States Environmental Protection Agency
Region 8
Air Program
1595 Wynkoop Street
Denver, Colorado 80202

Air Pollution Control Permit to Operate
Title V Operating Permit Program at 40 CFR Part 71

In accordance with the provisions of Title V of the Clean Air Act (CAA) and the Title V Operating Permit Program at 40 CFR Part 71 (Part 71) and applicable rules and regulations,

Castleton Commodities Incorporated San Juan, LLC
Barker Creek Compressor Station

is authorized to operate air emission units and to conduct other air pollutant emitting activities in accordance with the permit conditions listed in this permit.

This source is authorized to operate at the following location:

Ute Mountain Ute Indian Reservation
Latitude 36.93056 N, Longitude -108.28056 W
San Juan County, New Mexico

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations. All terms and conditions of the permit are enforceable by the EPA and citizens under the CAA**.**

Carl Daly, Director
Air Program
U.S. EPA Region 8

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Air Pollution Control Permit to Operate
Title V Operating Permit Program at 40 CFR Part 71

Castleton Commodities Incorporated San Juan, LLC
(CCI San Juan)
Barker Creek Compressor Station

Permit Number: V-UM-000001-2014.00
Replaces Permit No.: V-UM-0001-09.00

Issue Date: TBD
Effective Date: TBD
Expiration Date: TBD

The permit number cited above should be referenced in future correspondence regarding this facility.

Table 1. Part 71 Permitting History

Date of Action	Permit Number	Type of Action	Description of Action
March 2010	V-UM-0001-09.00	Initial Permit	N/A
TBD	V-UM-000001-2014.00	Permit Renewal	Includes Change of Ownership

Table of Contents

I. Facility Information and Emission Unit Identification

A. Facility Information

Parent Company Name:	Castleton Commodities Incorporated San Juan, LLC
Plant Operator & Name:	Barker Creek Compressor Station
Plant Location:	Latitude 36.93056 N, Longitude -108.28056 W
Region:	8
State:	New Mexico
County:	San Juan
Reservation:	Ute Mountain Indian Reservation
Tribe:	Ute Mountain Ute Indian Tribe
Responsible Official:	Vice President/General Manager – CCI San Juan, LLC
SIC Code:	1311

Description:

Barker Creek is a natural gas compressor station located in northwestern New Mexico within the exterior boundaries of the Ute Mountain Indian Reservation. The facility began operations in 2003 to provide field compression for natural gas wells.

The inlet gas and any associated pipeline liquids entering the compressor station pass through a horizontal separator (not a Joule-Thompson or dewpoint skid) where gas is separated and routed to the inlet of the compressor. Pipeline liquids are primarily water and are routed as a single stage to offsite storage not owned or operated by CCI San Juan. In the event any associated condensate is entrained with the water, flashing emissions are routed along with the gas to the inlet of the compressor. The separator is not an emissions source, hence no flashing emissions occur. No other equipment is connected with the separator, except the gas inlet, gas outlet, and liquids outlet piping and associated connections. The compressor engine at Barker Creek is a Waukesha L5794GSI reciprocating internal combustion engine (RICE) fueled by natural gas and using rich burn technology. CCI San Juan voluntarily operates a non-selective catalytic reduction (NSCR) emission control system on the compressor engine, as the engine is not subject to any federally enforceable requirements mandating its use.

B. Facility Emission Points

Table 2 – Emission Units and Emission Generating Activities

Unit I.D.	Description	Control Equipment
C-11101	Waukesha L5794GSI 4-stroke rich-burn (4SRB) stationary RICE, 1,380 hp, 3.51 MMBtu/hr, natural gas-fired: Serial No. C-1442/1 Installed: 8/26/2003 Mfg:[prior to June 12, 2006]	NSCR 3-Way Converter (not enforceable)
IEU	Process fugitives (fugitive emissions from gas valves, light liquid valves, relief valves, liquid flanges, open-ended lines, compressor seals, pump seals, and gas flanges)	

* Mfg = Manufactured; hp = horsepower; MMBtu/hr = million British thermal units per hour.

II. National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines - 40 CFR Part 63, Subpart ZZZZ

A. Applicability [40 CFR 63.6585]

40 CFR Part 63, Subpart ZZZZ applies to the following emission unit identified as C-11101 in Table 2 of this permit;

B. General Provisions [40 CFR 63.6665]

1. The General Provisions at 40 CFR Part 63, Subpart A apply as specified in Table 8 of 40 CFR Part 63, Subpart ZZZZ. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart A.

2. All reports required under 40 CFR Part 63, Subpart A shall be sent to the EPA at the following address as listed in 40 CFR 63.13:

   Director, Air and Toxics Technical Enforcement Program, 8ENF–AT
   Office of Enforcement, Compliance and Environmental Justice
   1595 Wynkoop Street, Denver, CO 80202–1129

C. Maintenance Requirements [40 CFR 63.6603 and 63.6605]

1. The Permittee must comply with the maintenance requirements that apply to existing non-emergency spark ignition 4SRB stationary RICE with a site rating of more than 500 hp located at area sources of hazardous air pollutants (HAP) that are remote stationary RICE at 40 CFR 63.6603(a) and Table 2d 40 CFR Part 63, Subpart ZZZZ.

2. Pursuant to 40 CFR 63.6603(f), the Permittee must evaluate and document that the engine meets the definition of remote stationary RICE in 40 CFR 63.6675. If an evaluation indicates that the stationary RICE no longer meets the definition of remote stationary RICE in 40 CFR 63.6675, the Permittee must comply with all of the requirements for existing non-emergency spark ignition

4SRB stationary RICE with a site rating of more than 500 hp located at area sources of HAP that are not remote stationary RICE within 1 year of the evaluation.

3. The Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if the required levels have been achieved. Determination of whether such operations and maintenance procedures are being used will be based on information available to the EPA, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.6605(b)]

D. Continuous Compliance Requirements [40 CFR 63.6640]

1. The Permittee must demonstrate continuous compliance with maintenance requirements that apply to existing non-emergency 4SRB stationary RICE >500 HP located at an area source of HAP that are remote stationary RICE according to 40 CFR 63.6640 and Table 6 of 40 CFR Part 63, Subpart ZZZZ.

E. Notifications, Reports, and Records [40 CFR 63.6645, 63.6650, 63.6655, 63.6660]

1. The Permittee must submit notifications as specified in 40 CFR 63.6645.

2. The Permittee must submit reports as specified in 40 CFR 63.6650.

3. The Permittee must keep records as specified in 40 CFR 63.6655.

4. The Permittee must keep the records in the format and for the duration as specified in 40 CFR 63.6660.

III. <u>Facility-Wide Requirements</u> [40 CFR 71.6(a)(1)]

Conditions in this section of this permit apply to all emissions units located at the source, including any units not specifically listed in Table 2 of the Facility Emission Points section of this permit.

A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]

The Permittee shall comply with the following generally applicable recordkeeping requirements:

1. If the Permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more HAPs is not subject to a relevant standard or other requirement established under 40 CFR Part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the

source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). [40 CFR 63.10(b)(3)]

2. Records shall be kept of off permit changes, as required by the Off Permit Changes section of this permit.

B. Reporting Requirements [40 CFR 71.6(a)(3)(iii)]

1. The Permittee shall submit to the EPA all reports of any required monitoring under this permit semiannually. The first report shall cover the period from the effective date of this permit through December 31st, 2014. Thereafter, the report shall be submitted semi-annually, by April 1st and October 1st of each year. The report due on April 1st shall cover the 6 month period ending on the last day of December before the report is due. The report due on October 1st shall cover the 6 month period ending on the last day of June before the report is due. All instances of deviations from permit requirements shall be clearly identified in such reports. All required reports shall be certified by a responsible official consistent with the Submissions section of this permit.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "SIXMON" for 6 month monitoring reports. The form may be found on EPA's website at: http://www.epa.gov/air/oaqps/permits/p71forms.html.]

2. "Deviation" means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with 40 CFR 71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

   (a) A situation where emissions exceed an emission limitation or standard;

   (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or

   (c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.

3. The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" is defined as follows:

(a) Any definition of "prompt" or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.

(b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

(i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than 2 hours in excess of permit requirements, the report must be made within 48 hours.

(iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.

(c) If any of the conditions in (i) or (ii) of paragraph (b) above are met, the Permittee must notify EPA by telephone (1-800-227-6312), facsimile (303-312-6409), or by email to r8airreportenforcement@epa.gov based on the timetables listed above. *[Notification must specify that this notification is a deviation report for a Part 71 permit]*. A written notice, certified consistent with the Submissions section of this permit must be submitted within 10 working days of the occurrence. All deviations reported under this section must also be identified in the 6-month report required under Condition 1 in this section of this permit.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "PDR" for prompt deviation reporting. The form may be found on the EPA's website at: http://www.epa.gov/air/oaqps/permits/p71forms.html]

IV. General Provisions

A. Annual Fee Payment [40 CFR 71.9]

1. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below.

2. The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year.

3. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency.

4. The Permittee shall send fee payment and a completed fee filing form to:

For regular U.S. Postal Service mail express mail	**For non-U.S. Postal Service** (FedEx, Airborne, DHL, and UPS)
U.S. Environmental Protection Agency FOIA and Miscellaneous Payments Cincinnati Finance Center Payments P.O. Box 979078 St. Louis, MO 63197-9000	U.S. Bank Government Lockbox 979078 U.S. EPA FOIA & Misc. 1005 Convention Plaza SL-MO-C2-GL St. Louis, MO 63101

5. The Permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by the same deadline as required for fee payment to the address listed in the Submissions section of this permit.

   [Explanatory note: The fee filing form "FF" and the fee calculation worksheet form "FEE" may be found on the EPA website at: http://www.epa.gov/air/oaqps/permits/p71forms.html]

6. Basis for calculating annual fee:

   (a) The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all "regulated pollutants (for fee calculation)" emitted from the source by the presumptive emissions fee (in dollars per ton) in effect at the time of calculation.

      (i) "Actual emissions" means the actual rate of emissions in tpy of any regulated pollutant (for fee calculation) emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit's actual operating hours, production rates, in-place control equipment, and types

of materials processed, stored, or combusted during the preceding calendar year.

(ii) Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.

(iii) If actual emissions cannot be determined using the compliance methods in the permit, the Permittee shall use other federally recognized procedures.

[Explanatory note: The presumptive fee amount is revised each calendar year to account for inflation, and it is available from the EPA prior to the start of each calendar year.]

(b) The Permittee shall exclude the following emissions from the calculation of fees:

(i) The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tpy;

(ii) Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and

(iii) The quantity of actual emissions (for fee calculation) of insignificant activities [defined in §71.5(c)(11)(i)] or of insignificant emissions levels from emissions at the source identified in the Permittee's application pursuant to §71.5(c)(11)(ii).

7. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official.

[Explanatory note: The fee calculation worksheet form already incorporates a section to help you meet this responsibility.]

8. The Permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for 5 years following submittal of fee payment. [Emission-related data include, for example, emissions-related forms provided by the EPA and used by the Permittee for fee calculation purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with §71.6(a)(3)(ii).]

9. Failure of the Permittee to pay fees in a timely manner shall subject the Permittee to assessment of penalties and interest in accordance with §71.9(l).

10. When notified by the EPA of underpayment of fees, the Permittee shall remit full payment within 30 days of receipt of notification.

11. A Permittee who thinks an EPA-assessed fee is in error and who wishes to challenge such fee, shall provide a written explanation of the alleged error to the EPA along with full payment of the EPA assessed fee.

B. Annual Emissions Inventory [40 CFR 71.9(h)(1)and (2)]

1. The Permittee shall submit an annual emissions report of its actual emissions for both criteria pollutants and regulated HAPs for this source for the preceding calendar year for fee assessment purposes. The annual emissions report shall be certified by a responsible official and shall be submitted each year to the EPA by April 1st.

2. The annual emissions report shall be submitted to the EPA at the address listed in the Submissions section of this permit.

[Explanatory note: An annual emissions report, required at the same time as the fee calculation worksheet by §71.9(h), has been incorporated into the fee calculation worksheet form as a convenience.]

C. Compliance Requirements [40 CFR 71.6(a)(6), Section 113(a) and 113(e)(1) of the CAA, and 40 CFR 51.212, 52.12, 52.33, 60.11(g), 61.12]

1. Compliance with the Permit

   (a) The Permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance constitutes a violation of the CAA and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

   (b) It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

   (c) For the purpose of submitting compliance certifications in accordance with §71.6(c)(5), or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

2. Compliance Schedule [40 CFR 71.5(c)(8)(iii)]

   (a) For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.

   (b) For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

3. Compliance Certifications [40 CFR 71.6(c)(5)]

   (a) The Permittee shall submit to the EPA a certification of compliance with permit terms and conditions, including emission limitations,

standards, or work practices annually by April 1st, and shall cover the same 12-month period as the two consecutive semi-annual monitoring reports.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a reporting form for annual compliance certifications. The form may be found on EPA website at: http://www.epa.gov/air/oaqps/permits/p71forms.html]

(b) The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR 71.5(d).

(c) The certification shall include the following:

(i) Identification of each permit term or condition that is the basis of the certification;

(ii) The identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in this permit. If necessary, the Permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information;

(iii) The status of compliance with each term and condition of the permit for the period covered by the certification based on the method or means designated in (ii) above. The certification shall identify each deviation and take it into account in the compliance certification;

(iv) Such other facts as the EPA may require to determine the compliance status of the source; and

(v) Whether compliance with each permit term was continuous or intermittent.

D. Duty to Provide and Supplement Information
[40 CFR 71.6(a)(6)(v), 71.5(a)(3), and 71.5(b)]

1. The Permittee shall furnish to the EPA, within a reasonable time, any information that EPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential must be accompanied by a claim of confidentiality according to the provisions of 40 CFR Part 2, Subpart B.

2. The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly

submit such supplementary facts or corrected information. In addition, a Permittee shall provide additional information as necessary to address any requirements that become applicable after the date a complete application is filed, but prior to release of a draft permit.

E. Submissions [40 CFR 71.5(d), 71.6(c)(1) and 71.9(h)(2)]

1. Any document (application form, report, compliance certification, etc.) required to be submitted under this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Explanatory note: the EPA has developed a reporting form "CTAC" for certifying truth, accuracy and completeness of Part 71 submissions. The form may be found on EPA website at: http://www.epa.gov/air/oaqps/permits/p71forms.html]

2. All fee calculation worksheets and applications for renewals and permit modifications shall be submitted to:

Part 71 Permit Contact, Air Program, 8P-AR
U.S. Environmental Protection Agency,
1595 Wynkoop Street
Denver, Colorado 80202

3. Except where otherwise specified, all reports, test data, monitoring data, notifications, and compliance certifications shall be submitted to:

Director, Air Toxics and Technical Enforcement Program, 8ENF-AT
U.S. Environmental Protection Agency,
1595 Wynkoop Street
Denver, Colorado 80202

F. Severability Clause [40 CFR 71.6(a)(5)]

The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

G. Permit Actions [40 CFR 71.6(a)(6)(iii)]

This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

H. Administrative Permit Amendments [40 CFR 71.7(d)]

The Permittee may request the use of administrative permit amendment procedures for a permit revision that:

1. Corrects typographical errors;

2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

3. Requires more frequent monitoring or reporting by the Permittee;

4. Allows for a change in ownership or operational control of a source where the EPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA;

5. Incorporates into the Part 71 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of 40 CFR 71.7 and 71.8 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in 40 CFR 71.6; or

6. Incorporates any other type of change which EPA has determined to be similar to those listed in (1) through (5) above.

[Note to Permittee: If 1 through 5 above do not apply, please contact the EPA for a determination of similarity prior to submitting your request for an administrative permit amendment under this provision.]

I. Minor Permit Modifications [40 CFR 71.7(e)(1)]

1. The Permittee may request the use of minor permit modification procedures only for those modifications that:

   (a) Do not violate any applicable requirement;

   (b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

   (c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

   (d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

(i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I; and

(ii) An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA;

(e) Are not modifications under any provision of Title I of the CAA; and

(f) Are not required to be processed as a significant modification.

2. Notwithstanding the list of changes ineligible for minor permit modification procedures in 1 above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by EPA.

3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR 71.5(c) and shall include the following:

(a) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

(b) The source's suggested draft permit;

(c) Certification by a responsible official, consistent with 40 CFR 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

(d) Completed forms for the permitting authority to use to notify affected States as required under 40 CFR 71.8.

4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

5. The permit shield under 40 CFR 71.6(f) may not extend to minor permit modifications.

J. Significant Permit Modifications [40 CFR 71.7(e)(3), 71.8(d), and 71.5(a)(2)]

1. The Permittee must request the use of significant permit modification procedures for those modifications that:

   (a) Do not qualify as minor permit modifications or as administrative amendments;

   (b) Are significant changes in existing monitoring permit terms or conditions; or

   (c) Are relaxations of reporting or recordkeeping permit terms or conditions.

2. Nothing herein shall be construed to preclude the Permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.

3. Permittees must meet all requirements of Part 71 for applications, public participation, and review by affected states and tribes for significant permit modifications. For the application to be determined complete, the Permittee must supply all information that is required by 40 CFR 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change.

K. Reopening for Cause [40 CFR 71.7(f)]

The permit may be reopened and revised prior to expiration under any of the following circumstances:

1. Additional applicable requirements under the CAA become applicable to a major Part 71 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 71.7(c)(3);

2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;

3. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

4. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

L. Property Rights [40 CFR 71.6(a)(6)(iv)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

M. Inspection and Entry [40 CFR 71.6(c)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the EPA or an authorized representative to perform the following:

2. Enter upon the Permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

3. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

4. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

5. As authorized by the CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

N. Emergency Provisions [40 CFR 71.6(g)]

1. In addition to any emergency or upset provision contained in any applicable requirement, the Permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the Permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

   (a) An emergency occurred and that the Permittee can identify the cause(s) of the emergency;

   (b) The permitted source was at the time being properly operated;

   (c) During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and

   (d) The Permittee submitted notice of the emergency to the EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective

actions taken. This notice fulfills the requirements for prompt notification of deviations.

2. In any enforcement proceedings the Permittee attempting to establish the occurrence of an emergency has the burden of proof.

3. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

O. Transfer of Ownership or Operation [40 CFR 71.7(d)(1)(iv)]

A change in ownership or operational control of this source may be treated as an administrative permit amendment if the EPA determines no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA.

P. Off Permit Changes [40 CFR 71.6(a)(12) and 40 CFR 71.6(a)(3)(ii)]

The Permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met, and that all records required by this section are kept for a period of 5 years:

1. Each change is not addressed or prohibited by this permit;

2. Each change shall meet with all applicable requirements and shall not violate any existing permit term or condition;

3. Changes under this provision may not include changes subject to any requirement of 40 CFR Parts 72 through 78 or modifications under any provision of Title I of the CAA;

4. The Permittee must provide contemporaneous written notice to the EPA of each change, except for changes that qualify as insignificant activities under 40 CFR 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;

5. The permit shield does not apply to changes made under this provision;

6. The Permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes;

7. The notice shall be kept on site and made available to the EPA on request, in accordance with the general recordkeeping provision of this permit; and

8. Submittal of the written notice required above shall not constitute a waiver, exemption, or shield from applicability of any applicable standard or PSD permitting requirements under 40 CFR 52.21 that would be triggered by the change.

Q. Permit Expiration and Renewal [40 CFR 71.5(a)(1)(iii), 71.5(a)(2), 71.5(c)(5), 71.6(a)(11), 71.7(b), 71.7(c)(1), and 71.7(c)(3)]

1. This permit shall expire upon the earlier occurrence of the following events:

   (a) Five (5) years elapse from the date of issuance; or

   (b) The source is issued a Part 70 or Part 71 permit under an EPA-approved or delegated permit program.

2. Expiration of this permit terminates the Permittee's right to operate unless a timely and complete permit renewal application has been submitted at least 6 months but not more than 18 months prior to the date of expiration of this permit.

3. If the Permittee submits a timely and complete permit application for renewal, consistent with 40 CFR 71.5(a)(2), but the EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR 71.6(f) shall remain in effect until the renewal permit has been issued or denied.

4. The Permittee's failure to have a Part 71 permit is not a violation of this part until the EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by the EPA.

5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected State, and tribal review.

6. The application for renewal shall include the current permit number, description of permit revisions and off permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

Air Pollution Control
Federal Clean Air Act (CAA) Title V Permit to Operate
Statement of Basis for Draft Permit No. V-UM-000001-2014.00

CCI San Juan LLC
Barker Creek Compressor Station
Ute Mountain Ute Indian Reservation
San Juan County, New Mexico

I. Facility Information

A. Location

The Barker Creek Compressor Station (Barker Creek) is owned and operated by Castleton Commodities Incorporated San Juan, LLC (CCI San Juan) and is located within the exterior boundaries of the Ute Mountain Ute Indian Reservation, in the northwestern part of the State of New Mexico. The exact location is Latitude 36.93056N, Longitude -108.28056W, San Juan County, New Mexico. The mailing address is:

Barker Creek Compressor Station
99 County Road 6500
Kirtland, New Mexico 87417

B. Contact

Leann Plagens
CCI San Juan LLC
811 Main Street Suite 3500
Houston, TX 77002
leann.plagens@cci.com

C. Description of Operations

Barker Creek is a natural gas compressor station, which began operation in 2003. This is the first Part 71 renewal for the Barker Creek facility. The inlet gas and any associated pipeline liquids entering the compressor station pass through a horizontal separator (not a Joule-Thompson or dewpoint skid) where natural gas is separated and routed to the inlet of the compressor. Pipeline liquids are primarily water and are routed as a single phase to offsite storage not owned or operated by CCI San Juan. In the event any associated condensate is entrained with the water, flashing emissions are routed along with the natural gas to the inlet of the compressor. The separator is not an emissions source, as inlet gas and separated natural gas and pipeline liquids are routed to and from the separator through a closed-vent piping system, and no other equipment is connected with the separator. The compressor is driven by a natural gas-fired rich-burn reciprocating internal combustion engine (RICE). CCI San Juan voluntarily operates non-selective catalytic reduction (NSCR) emission control system on the compressor engine, as the engine is not subject to any federally enforceable requirements mandating its use.

D. Emission Points

Table 1 lists emission units and emission generating activities, including any air pollution control devices. The Title V Operating Permit Program at 40 CFR Part 71 (Part 71) allows the Permittee to separately list in the permit application units or activities that qualify as "insignificant" based on potential emissions below 2 tons per year (tpy) for all regulated pollutants that are not listed as hazardous air pollutants (HAPs) under section 112(b) and below 1,000 lbs/year or the de minimis level established under section 112(g), whichever is lower, for HAPs. However, the application may not omit information needed to determine the applicability of, or to impose, any applicable requirement. Units and activities that qualify as "insignificant" for the purposes of the Part 71 application are in no way exempt from applicable requirements or any requirements of the Part 71 permit.

Table 1 – Emission Units and Emission Generating Activities

Unit I.D.	Description	Control Equipment
C-1101	Waukesha L5794GSI 4-stroke RICE, 1,380 hp, 3.51 MMBtu/hr, natural gas-fired: Serial No. C-1442/1 Installed: 8/26/2003 Mfg:[prior to June 12, 2006]	NSCR 3-Way Converter (not enforceable)
IEU	Process fugitives (fugitive emissions from gas valves, light liquid valves, relief valves, liquid flanges, open-ended lines, compressor seals, pump seals, and gas flanges)	

* Mfg = Manufactured; hp = horsepower;
MMBtu/hr = million British thermal units per hour.

E. Potential to Emit

Pursuant to 40 CFR 52.21, potential to emit (PTE) is defined as the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation, or the effect it would have on emissions, is federally enforceable. Independently enforceable applicable requirements are considered enforceable to the extent that the source is in compliance with the standard. In addition, beneficial reductions in non-targeted pollutants resulting from compliance with an independently enforceable applicable requirement may be counted towards PTE provided the emission reduction of the non-targeted pollutant is enforceable as a practical matter and compliance is being met. See the 1995 guidance memo signed by John Seitz, Director of the Office of Air Quality Planning and Standards titled, "Options for Limiting Potential to Emit of a Stationary Source under Section 112 and Title V of the Clean Air Act".

CCI San Juan reported the uncontrolled emission unit-specific PTE in their Part 71 permit application. The Waukesha L5794GSI compressor engine at Barker Creek is equipped with a NSCR, three-way catalytic converter emissions control device. However, the compressor engine is not subject to any applicable regulations or a federally enforceable permit requiring the use of the control device to reduce emissions. The use of the catalytic converter at Barker Creek is not federally enforceable and is voluntary.

The PTE in Table 2 are based on the legally and practically enforceable requirements set forth in this proposed permit, and, for the purposes of the compressor engine, reflect uncontrolled emissions.

Table 2 – Potential-to-Emit With Legally and Practically Enforceable Controls

Regulated Air Pollutants (tpy)											
	NO_X*	**CO***	**VOC***	**PM***	**SO_2***	**CH_2O***	**Total HAPs***	**CO_2***	**CH_4* (as CO_2e)**	**N_2O* (as CO_2e)**	**CO_2e***
C-1101	193.1	146.5	6.0	0.4	0.0	0.67	0.67	4907	2.3	2.8	4912
IEUs	0	0	0.2	0	0	0	0	0	0	0	0
TOTAL	**193.10**	**146.49**	**6.2**	**0.4**	**0.00**	**0.67**	**0.67**	4907	2.3	2.8	4912

*NO_X = nitrogen oxide; CO = carbon monoxide; VOC = volatile organic compound; PM = particulate matter; SO_2 = sulfur dioxide; CH_2O = formaldehyde; HAP = hazardous air pollutant; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = equivalent CO_2;

II. Applicable Requirement Review

The following sections discuss the information provided by CCI San Juan in their Part 71 application, certified to be true and accurate by the Responsible Official of this facility.

A. 40 CFR 52.21 - Prevention of Significant Deterioration

The Prevention of Significant Deterioration (PSD) Permit Program at 40 CFR Part 52 is a preconstruction review requirement of the CAA that applies to proposed projects that are sufficiently large (in terms of emissions) to be a "major" stationary source or "major" modification of an existing stationary source. Source size is defined in terms of "PTE," which is its capability at maximum design capacity to emit a pollutant, except as constrained by existing legally and practically enforceable conditions applicable to the source. A new stationary source or a modification to an existing minor stationary source is major if the proposed project has the PTE any pollutant regulated under the CAA in amounts equal to or exceeding specified major source thresholds, which are 100 tpy for 28 listed industrial source categories and 250 tpy for all other sources. The PSD Permit Program also applies to modifications at existing major sources that cause a "significant net emissions increase" at that source. Significance levels for each pollutant are defined in the PSD regulations at 40 CFR 52.21.

According to the emissions information provided by CCI San Juan in their Part 71 application, Barker Creek is currently a minor source with respect to PSD as the PTE does not exceed the major source thresholds of any criteria pollutants regulated under the PSD Permit Program.

B. 40 CFR Part 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

This subpart establishes requirements for controlling VOC emissions from storage vessels with a capacity greater than or equal to 75 cubic meters that are used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information there are no petroleum storage vessels with capacity greater than 75 cubic meters at Barker Creek. Therefore, the facility is not subject to this subpart.

C. 40 CFR Part 60, Subpart KKK: Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011

This subpart establishes requirements for controlling fugitive VOC emissions from onshore natural gas processing plants. It applies to natural gas processing plants that commenced construction, reconstruction, or modification after January 20, 1984 and on or before August 23, 2011.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information, Barker Creek is not a natural gas processing plant (as defined in the rule). Therefore the facility is not subject to this subpart.

D. 40 CFR Part 60, Subpart LLL: Standards of Performance for SO_2 Emissions From Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011

This subpart applies to sweetening units and sulfur recovery units at onshore natural gas processing facilities. As defined in this subpart, sweetening units are process devices that separate hydrogen sulfide (H_2S) and CO_2 from a sour natural gas stream. Sulfur recovery units are defined as process devices that recover sulfur from the acid gas (consisting of H_2S and CO_2) removed by a sweetening unit.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information, neither sweetening nor sulfur recovery are performed at Barker Creek. Therefore, this facility is not subject to this subpart.

E. 40 CFR Part 60, Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

This subpart establishes emission standards and compliance requirements for the control of emissions from stationary spark ignition internal combustion engines that commenced construction, modification, or reconstruction after June 12, 2006, and are manufactured on or after specified manufacture trigger dates. The manufacture trigger dates are based on the engine type, fuel used, and maximum engine hp.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information, the engine operating at Barker Creek was manufactured prior to the manufacture trigger date in the rule, January 1, 2008. Therefore, this subpart does not apply.

F. 40 CFR Part 60, Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas production, Transmission, and Distribution

This subpart establishes emission standards for the control of VOC and SO_2 emissions from affected facilities that commence construction, modification, or reconstruction after August 23, 2011.

Affected facilities include, but are not limited to well completions, centrifugal compressors, reciprocating compressors, pneumatic controllers, storage vessels, and sweetening units.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information, the current equipment at Barker Creek predates the applicability date for this subpart. Therefore, this facility is not subject to this subpart.

G. 40 CFR Part 63, Subpart HH: National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities

This subpart establishes emission standards for the control of HAP emissions from affected units located at natural gas production facilities that process, upgrade, or store natural gas prior to the point of custody transfer, or that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. The affected units are glycol dehydration units, storage vessels with the potential for flash emissions (as defined in the rule) and the group of ancillary equipment and compressors intended to operate in volatile HAP service which are located at natural gas processing plants.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information, Barker Creek does not operate any storage vessels with the potential for flash emissions (as defined in the rule) or Triethylene Glycol (TEG) dehydration units. Therefore, Barker Creek is not subject to this subpart.

H. 40 CFR Part 63, Subpart ZZZZ (MACT ZZZZ): National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

This subpart establishes emission standards and operating limitations for the control of HAP emissions from spark ignition and compression ignition RICE.

Based on the information provided by CCI San Juan in their Part 71 application and our review of that information, CCI San Juan is subject to the requirements for non-emergency spark ignition 4-stroke rich-burn, remote existing stationary engines >500 hp, constructed before June 12, 2006 operating at area sources of HAP emissions. The affected unit at Barker Creek is the RICE operating at the facility, Emission Unit C1101.

I. 40 CFR Part 64: Compliance Assurance Monitoring

Pursuant to requirements concerning enhanced monitoring and compliance certification under the CAA, the EPA promulgated regulations to implement compliance assurance monitoring (CAM) for major stationary sources of air pollution, for purposes of Title V permitting that are required to obtain operating permits under Part 71. The rule requires owners or operators of such sources to conduct monitoring that provide a reasonable assurance of compliance with applicable requirements under the CAA. The effective date of this rule is November 21, 1997.

1. CAM Applicability

According to 40 CFR 64.2(a), CAM applies to <u>each</u> pollutant specific emission unit (PSEU) located at a major source which is required to obtain a Part 71 permit if the unit satisfies all of the following criteria:

(a) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant other than an emissions limitation or standard that is exempt under 40 CFR 64.2(b)(1);

(b) The unit uses a control device to achieve compliance with any such limit or standard; and

(c) The unit has pre-control device emissions of the applicable regulated pollutant that are equal to or greater than 100 percent of the amount, in tpy, required for a source to be classified as a major Title V source.

2. CAM Plan Submittal Deadlines

(a) Large PSEUs. A CAM plan submittal for all PSEUs with the PTE (taking into account control devices) of any one regulated air pollutant in an amount equal to or greater than 100 percent of the amount, in tpy, required for a source to be classified as a major source, is due at the following times:

(i) On or after April 20, 1998, if by that date, a Part 71 application has either:

(A) Not been filed; or
(B) Not yet been determined to be complete.

(ii) On or after April 20, 1998, if a Part 71 permit application for a significant modification is submitted with respect to those PSEUs for which the requested permit revision is applicable; or

(iii) Upon application for a renewed Part 71 permit and a CAM plan has not yet been submitted with an initial or a significant modification application, as specified above.

(b) Other PSEUs. A CAM Plan must be submitted for all PSEUs that are not large PSEUs, but are subject to this rule, upon application for a Part 71 renewal permit.

Based on the information provided by CCI San Juan in their Part 71 application, and our review of that information, there are no PSEUs at Barker Creek that are subject to an emission standard or limitation. Therefore, the facility is not subject to CAM requirements.

J. 40 CFR Part 68: Chemical Accident Prevention Provisions

This rule applies to stationary sources that manufacture, process, use, store, or otherwise handle more than the threshold quantity of a regulated substance in a process. Regulated substances include 77 toxic and 63 flammable substances which are potentially present in the natural gas stream entering the facility and in the storage vessels located at the facility. The quantity of a regulated substance in a process is determined according to the procedures presented under 40 CFR 68.115. 40 CFR 68.115(b)(l) and (2)(i) indicate that toxic and flammable substances in a mixture do not need to be considered when determining whether more than a threshold quantity is present at a stationary source if the concentration of the substance is below one percent by weight of the mixture.

40 CFR 68.115(b)(2)(iii) indicates that prior to entry into a natural gas processing plant, regulated substances in naturally occurring hydrocarbon mixtures need not be considered when determining whether more than a threshold quantity is present at a stationary source. Naturally occurring hydrocarbon mixtures include condensate, field gas, and produced water.

Based on the updated information provided in CCI San Juan's Part 71 application, Barker Creek does not have regulated substances above the threshold quantities in this rule and therefore is not subject to the requirement to develop and submit a risk management plan.

K. 40 CFR Part 71: Emergency Provisions

In this draft Part 71 renewal permit, the EPA is not proposing to include the "Emergency Provisions" located in permit condition III.O. in the existing effective Part 71 permit. These provisions were modeled on the "Emergency provision" contained in the regulations in 40 CFR Part 71 applicable to federal operating permit programs. Specifically, in the regulations discussing the contents of Title V operating permits issued under the federal operating permits program, 40 CFR 71.6(g) provides that certain "emergency" events can constitute "an affirmative defense in an action brought for non-compliance" with certain emission limits contained in the permit, when certain conditions are met. However, nothing in the CAA or 40 CFR Part 71 requires that these types of emergency provisions be included as conditions in operating permits issued by the EPA, and for the reasons discussed below, we are exercising our discretion not to include them in this draft part 71 renewal permit.

In 2014, a federal court ruled that the CAA does not authorize the EPA to create affirmative defense provisions applicable to certain enforcement actions. *See NRDC v. EPA*, 749 F.3d 1055 (D.C. Cir. 2014). The court ruled that Sections 113 and 304 of the CAA preclude the EPA from creating affirmative defense provisions in the Agency's regulations imposing HAP emission limits on sources. The court concluded that those affirmative defense provisions purported to alter the jurisdiction of federal courts generally provided in the CAA to assess liability and impose penalties for violations of emission limits in private civil enforcement cases, and that the CAA did not provide authority for the EPA to do so. Consistent with the reasoning in the *NRDC v. EPA* court decision, the EPA has determined that it is also not appropriate under the CAA to alter the jurisdiction of the federal courts through affirmative defenses provisions in its Title V regulations, such as those contained in the emergency provisions of 40 CFR 71.6(g), and that such provisions are inconsistent with the CAA. In light of the above-described D.C. Circuit Court decision and the EPA's obligation to issue Title V permits consistent with the applicable requirements of the Act, it is no longer appropriate to propose to include permit conditions modeled on affirmative defenses such as those contained in the emergency provisions of 40 CFR 71.6(g) in operating permits issued by the EPA.

Although the EPA views the Part 71 emergency provisions as discretionary (i.e., neither the statute nor the regulations mandate their inclusion in Part 71 permits), the EPA is considering whether to make changes to the Part 71 Permit Program regulations in order to ensure the EPA's regulations are consistent with the recent D.C. Circuit decisions; and if so, how best to make those changes. Until that time, as part of the normal permitting process, it is appropriate for the EPA permitting authorities to rely on the discretionary nature of the existing emergency provisions to choose not to continue to include permit terms modeled on those provisions in Part 71 permits that we are issuing in the first instance or renewing. By doing so, we are not only fulfilling the EPA's obligation to issue Title V permits consistent with the applicable requirements of the Act, but we will also help ensure that permitees do not continue to rely on permit provisions that have been found legally invalid.

Accordingly, in this draft Part 71 renewal permit, the EPA is exercising its discretion to not include the "Emergency Provisions" located in permit condition III.O. in the existing effective Part 71 permit, in order to ensure the Part 71 permit is in compliance with the applicable requirements of the Act.

III. EPA Authority

Title V of the CAA requires that the EPA promulgate, administer, and enforce a federal operating permit program when a state does not submit an approvable program within the time frame set by Title V or does not adequately administer and enforce its EPA approved program. On July 1, 1996 (61 FR 34202), the EPA adopted regulations codified at 40 CFR Part 71 setting forth the procedures and terms under which the agency would administer a federal operating permit program. These regulations were updated on February 19, 1999 (64 FR 8247) to incorporate the EPA's approach for issuing federal operating permits to stationary sources in Indian country.

As described in 40 CFR 71.4(a), the EPA will implement a Part 71 program in areas where a state, local, or tribal agency has not developed an approved Part 70 program. Unlike states, tribes are not required to develop operating permits programs, though the EPA encourages tribes to do so. See, e.g., Indian Tribes: Air Quality Planning and Management (63 FR 7253, February 12, 1998) (also known as the "Tribal Authority Rule"). Therefore, within Indian country, the EPA will administer and enforce a Part 71 federal operating permit program for stationary sources until a tribe receives approval to administer their own operating permit program.

IV. Use of All Credible Evidence

Determinations of deviations, continuous or intermittent compliance status, or violations of the permit are not limited to the testing or monitoring methods required by the underlying regulations or this permit; other credible evidence (including any evidence admissible under the Federal Rules of Evidence) must be considered by the Permittee and the EPA in such determinations.

V. Public Participation

A. Public Notice

As described in 40 CFR 71.11(a)(5), all Part 71 draft operating permits shall be publicly noticed and made available for public comment. The public notice of permit actions and public comment period is described in 40 CFR 71(d).

There will be a 30 day public comment period for actions pertaining to a draft permit. Notification will be given for this draft permit by mailing a copy of the notice to the permit applicant, the affected state, tribal and local air pollution control agencies, the city and county executives, and the state and federal land managers which have jurisdiction over the area where the source is located. A notification will be provided to all persons who have submitted a written request to be included on the mailing list.

If you would like to be added to our mailing list to be informed of future actions on these or other CAA permits issued in Indian country, please send an email using the link for the Ute Mountain Indian Reservation provided at http://www2.epa.gov/region8/air-permit-public-comment-opportunities, or send your name and address to the contact listed below:

Part 71 Permitting Lead
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street (8P-AR)
Denver, Colorado 80202-1129

Public notice will be published in the Farmington Daily Times giving opportunity for public comment on the draft permit and the opportunity to request a public hearing.

B. Opportunity to Comment

Members of the public will be given an opportunity to review a copy of the draft permit prepared by the EPA, the application, this Statement of Basis for the draft permit and all supporting materials for the draft permit. Copies of these documents are available at:

San Juan County Clerk's Office
100 S. Oliver Drive
Aztec, New Mexico 87410

and

Ute Mountain Ute Tribe
Environmental Programs Director
124 Mike Wash Road
Towaoc, CO 81334-0188

and

U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street (8P-AR)
Denver, Colorado 80202-1129

All documents are available for review at the Region 8 office Monday through Friday from 8:00 a.m. to 4:00 p.m. (excluding federal holidays). Electronic copies of the draft permit, statement of basis and permitting record may also be viewed at: http://www2.epa.gov/region8/air-permit-public-comment-opportunities.

Any interested person may submit written comments on the draft Part 71 operating permit during the public comment period to the Part 71 Permitting Lead at the address listed in Section A above, or by email using the instructions on the public comment opportunities web site address listed above. All comments will be considered and answered by the EPA in making the final decision on the permit. The EPA keeps a record of the commenters and of the issues raised during the public participation process.

Anyone, including the applicant, who believes any condition of the draft permit is inappropriate should raise all reasonable ascertainable issues and submit all arguments supporting their position by the close of the public comment period. Any supporting materials submitted must be included in full and may not be incorporated by reference, unless the material has already been submitted as part of the administrative record in the same proceeding or consists of state or federal statutes and regulations, EPA documents of general applicability or other generally available reference material.

The final permit will be a public record that can be obtained upon request. A statement of reasons for changes made to the draft permit and responses to comments received will be sent to all persons who comment on the draft permit. The final permit and response to comments document will also be available online at: http://www2.epa.gov/region8/title-v-operating-permits-issued-region-8.

C. Opportunity to Request a Hearing

A person may submit a written request for a public hearing to the Part 71 Permitting Lead, U.S. EPA Region 8, by stating the nature of the issues to be raised at the public hearing. Based on the number of hearing requests received, the EPA will hold a public hearing whenever it finds there is a significant degree of public interest in a draft operating permit. The EPA will provide public notice of the public hearing. If a public hearing is held, any person may submit oral or written statements and data concerning the draft permit.

D. Appeal of Permits

Within 30 days after the issuance of a final permit decision, any person who filed comments on the draft permit or participated in the public hearing may petition to the Environmental Appeals Board (EAB) to review any condition of the permit decision. Any person who failed to file comments or participate in the public hearing may petition for administrative review, only if the changes from the draft to the final permit decision or other new grounds were not reasonably foreseeable during the public comment period. The 30-day period to appeal a permit begins with the EPA's service of the notice of the final permit decision.

The petition to appeal a permit must include a statement of the reasons supporting the review, a demonstration that any issues were raised during the public comment period, a demonstration that it was impracticable to raise the objections within the public comment period, or that the grounds for such objections arose after such a period. When appropriate, the petition may include a showing that the condition in question is based on a finding of fact or conclusion of law which is clearly erroneous; or, an exercise of discretion, or an important policy consideration that the EAB should review.

The EAB will issue an order either granting or denying the petition for review, within a reasonable time following the filing of the petition. Public notice of the grant of review will establish a briefing schedule for the appeal and state that any interested person may file an amicus brief. Notice of denial of review will be sent only to the permit applicant and to the person requesting the review. To the extent review is denied, the conditions of the final permit decision become final agency action.

A motion to reconsider a final order shall be filed within ten days after the service of the final order. Every motion must set forth the matters claimed to have been erroneously decided and the nature of the alleged errors. Motions for reconsideration shall be directed to the Administrator rather than the EAB. A motion for reconsideration shall not stay the effective date of the final order unless it is specifically ordered by the EAB.

E. Petition to Reopen a Permit for Cause

Any interested person may petition the EPA to reopen a permit for cause, and the EPA may commence a permit reopening on its own initiative.

The EPA will only revise, revoke and reissue, or terminate a permit for the reasons specified in 40 CFR 71.7(f) or 71.6(a)(6)(i). All requests must be in writing and must contain facts or reasons supporting the request. If the EPA decides the request is not justified, it will send the requester a brief written response giving a reason for the decision. Denial of these requests is not subject to public notice, comment, or hearings. Denials can be informally appealed to the EAB by a letter briefly setting forth the relevant facts.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08

JUL 9 2015

Ref: 8P-AR

Mr. Jeremy Nichols
Director Climate and Energy Program
1536 Wynkoop St
Suite 302
Denver Colorado 80202

Re: Notice of Draft Title V Operating Permit for Operations on the Ute Mountain Indian Reservation

Dear Mr. Nichols:

In accordance with 40 CFR 71.8 and 71.11 (d)(2), the EPA Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft Title V federal operating permit for Castleton Commodities Incorporated San Juan, LLC - Barker Creek Compressor Station located on the Ute Mountain Indian Reservation.

Enclosed is a copy of the public notice, which will publish in the Farmington Daily Times on Monday July 13, 2015. The public notice contains details on the procedure for public review of the documents. Electronic copies of the draft permit, and Statement of Basis, application and other supporting information may also be viewed online at: http://www2.epa.gov/region8/air-permit-public-comment-opportunities.

In accordance with 40 CFR 71.11(d)(2), EPA Region 8 is providing a 30-day period from July 13, 2015 to August 12, 2015 for public comment on the draft permit. If a public hearing is held regarding this permit, you will be sent a copy of the public hearing notice at least 30 days in advance of the hearing date. Comments must be received by August 12, 2015 to be considered in the issuance of the final permit. Should EPA not accept any or all of these recommendations, you will be notified in writing and will be provided with the reasons for not accepting them.

A copy of the draft permit and Statement of Basis may be obtained by contacting the Part 71 permit contact. Please submit any written recommendations you may have concerning the terms and conditions of this permit to:

Noreen Okubo
Part 71 Permit Contact
Air Program, 8P-AR
U.S. EPA Region 8
1595 Wynkoop Street
Denver, Colorado 80202
303-312-6646
Okubo.noreen@epa.gov

Sincerely,

Noreen Okubo

Noreen Okubo
Air Permit Engineer
Air Program

Enclosure (1)
1. Public Notice

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08

JUL 9 2015

Ref: 8P-AR

Mr. Cordell TeCube
Program Director
Environmental Protection Office
Jicarilla Apache Tribe
PO Box 507
Dulce New Mexico 87528

Re: Notice of Draft Title V Operating Permit for Operations on the Ute Mountain Indian Reservation

Dear Mr. TeCube:

In accordance with 40 CFR 71.8 and 71.11 (d)(2), the EPA Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft Title V federal operating permit for Castleton Commodities Incorporated San Juan, LLC - Barker Creek Compressor Station located on the Ute Mountain Indian Reservation.

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Sincerely,

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Air Permit Engineer
Air Program

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REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
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http://www.epa.gov/region08

JUL 9 2015

Ref: 8P-AR

Mr. Michael King
Air Quality Control Program
Navaho Nation
Environmental Protection Office
PO Box 529
Fort Defiance Arizona 86504

Re: Notice of Draft Title V Operating Permit for Operations on the Ute Mountain Indian Reservation

Dear Mr. King:

In accordance with 40 CFR 71.8 and 71.11 (d)(2), the EPA Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft Title V federal operating permit for Castleton Commodities Incorporated San Juan, LLC - Barker Creek Compressor Station located on the Ute Mountain Indian Reservation.

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U.S. EPA Region 8
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303-312-6646
Okubo.noreen@epa.gov

Sincerely,

Noreen Okubo

Noreen Okubo
Air Permit Engineer
Air Program

Enclosure (1)
1. Public Notice

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08

JUL 9 2015

Ref: 8P-AR

Mr. Mark Hutson
Air Quality Program Manager
Southern Ute Indian Tribe
PO Box 737 MS#84
Ignacio Colorado 81137

Re: Notice of Draft Title V Operating Permit for Operations on the Ute Mountain Indian Reservation

Dear Mr. Hutson:

In accordance with 40 CFR 71.8 and 71.11 (d)(2), the EPA Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft Title V federal operating permit for Castleton Commodities Incorporated San Juan, LLC - Barker Creek Compressor Station located on the Ute Mountain Indian Reservation.

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Okubo.noreen@epa.gov

Sincerely,

Noreen Okubo

Noreen Okubo
Air Permit Engineer
Air Program

Enclosure (1)
1. Public Notice

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08
JUL 9 2015

Ref: 8P-AR

Mr. Eric C. Massey
Director Air Quality Division
Arizona Department of Environmental Quality
Central Office
1110 W. Washington Street
Phoenix, Arizona 85007

Re: Notice of Draft Title V Operating Permit for Operations on the Ute Mountain Indian Reservation

Dear Mr. Massey:

In accordance with 40 CFR 71.8 and 71.11 (d)(2), the EPA Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft Title V federal operating permit for Castleton Commodities Incorporated San Juan, LLC - Barker Creek Compressor Station located on the Ute Mountain Indian Reservation.

Enclosed is a copy of the public notice, which will publish in the Farmington Daily Times on Monday July 13, 2015. The public notice contains details on the procedure for public review of the documents. Electronic copies of the draft permit, and Statement of Basis, application and other supporting information may also be viewed online at: http://www2.epa.gov/region8/air-permit-public-comment-opportunities.

In accordance with 40 CFR 71.11(d)(2), EPA Region 8 is providing a 30-day period from July 13, 2015 to August 12, 2015 for public comment on the draft permit. If a public hearing is held regarding this permit, you will be sent a copy of the public hearing notice at least 30 days in advance of the hearing date. Comments must be received by August 12, 2015 to be considered in the issuance of the final permit. Should EPA not accept any or all of these recommendations, you will be notified in writing and will be provided with the reasons for not accepting them.

A copy of the draft permit and Statement of Basis may be obtained by contacting the Part 71 permit contact. Please submit any written recommendations you may have concerning the terms and conditions of this permit to:

Noreen Okubo
Part 71 Permit Contact
Air Program, 8P-AR
U.S. EPA Region 8
1595 Wynkoop Street
Denver, Colorado 80202
303-312-6646
Okubo.noreen@epa.gov

Sincerely,

Noreen Okubo

Noreen Okubo
Air Permit Engineer
Air Program

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JUL 9 2015

Ref: 8P-AR

Mr. William Allison
Director Air Pollution Control Division
Colorado Department of Human Health and Environment
4300 Cherry Creek Drive South
Denver CO 80246

Re: Notice of Draft Title V Operating Permit for Operations on the Ute Mountain Indian Reservation

Dear Mr. Allison:

In accordance with 40 CFR 71.8 and 71.11 (d)(2), the EPA Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft Title V federal operating permit for Castleton Commodities Incorporated San Juan, LLC - Barker Creek Compressor Station located on the Ute Mountain Indian Reservation.

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Air Program, 8P-AR
U.S. EPA Region 8
1595 Wynkoop Street
Denver, Colorado 80202
303-312-6646
Okubo.noreen@epa.gov

Sincerely,

Noreen Okubo

Noreen Okubo
Air Permit Engineer
Air Program

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JUL 9 2015

Ref: 8P-AR

Mr. Jeff Sorkin
U.S. Department of Agriculture
Forest Service
Air Quality Manager Rocky Mountain Region
Renewable Resources
740 Simms Street
Golden, Colorado 80401

Re: Notice of Draft Title V Operating Permit for Operations on the Ute Mountain Indian Reservation

Dear Mr. Sorkin:

In accordance with 40 CFR 71.8 and 71.11 (d)(2), the EPA Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft Title V federal operating permit for Castleton Commodities Incorporated San Juan, LLC - Barker Creek Compressor Station located on the Ute Mountain Indian Reservation.

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Okubo.noreen@epa.gov

Sincerely,

Noreen Okubo

Noreen Okubo
Air Permit Engineer
Air Program

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JUL 9 2015

Ref: 8P-AR

Mr. Don Shepherd
Policy Planning and Permit Review
National Park Service
Air Resources Division
12795 W. Alameda Parkway
Lakewood, Colorado 80228

Re: Notice of Draft Title V Operating Permit for Operations on the Ute Mountain Indian Reservation

Dear Mr. Shepherd:

In accordance with 40 CFR 71.8 and 71.11 (d)(2), the EPA Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft Title V federal operating permit for Castleton Commodities Incorporated San Juan, LLC - Barker Creek Compressor Station located on the Ute Mountain Indian Reservation.

Enclosed is a copy of the public notice, which will publish in the Farmington Daily Times on Monday July 13, 2015. The public notice contains details on the procedure for public review of the documents. Electronic copies of the draft permit, and Statement of Basis, application and other supporting information may also be viewed online at: http://www2.epa.gov/region8/air-permit-public-comment-opportunities.

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Air Program, 8P-AR
U.S. EPA Region 8
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Denver, Colorado 80202
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Air Permit Engineer
Air Program

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JUL 9 2015

Ref: 8P-AR

Mr. Richard Goodyear
Program Manager
Air Quality Bureau
New Mexico Environmental Department
525 Camino de los Marquez Suite #1
Santa Fe, New Mexico 87505

Re: Notice of Draft Title V Operating Permit for Operations on the Ute Mountain Indian Reservation

Dear Mr. Goodyear:

In accordance with 40 CFR 71.8 and 71.11 (d)(2), the EPA Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft Title V federal operating permit for Castleton Commodities Incorporated San Juan, LLC - Barker Creek Compressor Station located on the Ute Mountain Indian Reservation.

Enclosed is a copy of the public notice, which will publish in the Farmington Daily Times on Monday July 13, 2015. The public notice contains details on the procedure for public review of the documents. Electronic copies of the draft permit, and Statement of Basis, application and other supporting information may also be viewed online at: http://www2.epa.gov/region8/air-permit-public-comment-opportunities.

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A copy of the draft permit and Statement of Basis may be obtained by contacting the Part 71 permit contact. Please submit any written recommendations you may have concerning the terms and conditions of this permit to:

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Part 71 Permit Contact
Air Program, 8P-AR
U.S. EPA Region 8
1595 Wynkoop Street
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303-312-6646
Okubo.noreen@epa.gov

Sincerely,

Noreen Okubo

Noreen Okubo
Air Permit Engineer
Air Program

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JUL 9 2015

Ref: 8P-AR

Mr. Bryce Bird
Director Air Quality Division
Utah Department of Environmental Quality
P.O Box 144820
Salt Lake City UT 84114

Re: Notice of Draft Title V Operating Permit for Operations on the Ute Mountain Indian Reservation

Dear Mr. Bird:

In accordance with 40 CFR 71.8 and 71.11 (d)(2), the EPA Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft Title V federal operating permit for Castleton Commodities Incorporated San Juan, LLC - Barker Creek Compressor Station located on the Ute Mountain Indian Reservation.

Enclosed is a copy of the public notice, which will publish in the Farmington Daily Times on Monday July 13, 2015. The public notice contains details on the procedure for public review of the documents. Electronic copies of the draft permit, and Statement of Basis, application and other supporting information may also be viewed online at: http://www2.epa.gov/region8/air-permit-public-comment-opportunities.

In accordance with 40 CFR 71.11(d)(2), EPA Region 8 is providing a 30-day period from July 13, 2015 to August 12, 2015 for public comment on the draft permit. If a public hearing is held regarding this permit, you will be sent a copy of the public hearing notice at least 30 days in advance of the hearing date. Comments must be received by August 12, 2015 to be considered in the issuance of the final permit. Should EPA not accept any or all of these recommendations, you will be notified in writing and will be provided with the reasons for not accepting them.

A copy of the draft permit and Statement of Basis may be obtained by contacting the Part 71 permit contact. Please submit any written recommendations you may have concerning the terms and conditions of this permit to:

Noreen Okubo
Part 71 Permit Contact
Air Program, 8P-AR
U.S. EPA Region 8
1595 Wynkoop Street
Denver, Colorado 80202
303-312-6646
Okubo.noreen@epa.gov

Sincerely,

Noreen Okubo

Noreen Okubo
Air Permit Engineer
Air Program

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JUL 7 2015

Ref: 8P-AR

Ms. Debbie Holmes
San Juan County Clerk
P.O. Box 550
100 South Oliver Drive
Aztec NM 87410

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Ms. Holmes:

The U.S. Environmental Protection Agency (EPA), Region 8, will be issuing a public notice in the Farmington Daily Times on July 13, 2015 regarding the draft Clean Air Act Title V Permit to Operate (40 CFR Part 71) for the following source:

Castleton Commodities Incorporated San Juan, LLC-Barker Creek Compressor Station

The public comment period for this notice will end on August 12, 2015. Please make the enclosed draft permit, Statement of Basis, and permit application available for public inspection until the end of the public comment period.

Thank you for your assistance in this matter. Should you have any questions regarding our request you may contact me at (303) 312-6646.

Sincerely,

Noreen Okubo

Noreen Okubo, Air Permit Engineer
Air Program

Enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
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JUL 7 2015

Ref: 8P-AR

Scott Clow, Environmental Director
Ute Mountain Ute Indian Tribe
Environmental Programs Office
P.O. Box 448
Towaoc, CO 81334

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Transmittal of Draft Title V Permit to Operate on Ute Mountain Indian Reservation

Dear Mr. Clow:

In accordance with 40 CFR 71.8 and 71.11(d)(2), the U.S. Environmental Protection Agency Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft Clean Air Act Title V Permit to Operate for the following source located on the Ute Mountain Indian Reservation.

Castleton Commodities Incorporated San Juan, LLC - Barker Creek Compressor Station

Region 8 is providing a 30-day period, from July 13, 2015 to August 12, 2015 for comment. Please make the enclosed draft permit, Statement of Basis, permit application, and additional supporting information available for public inspection until the end of the public comment period.

Electronic copies of the draft permit and Statement of Basis may also be viewed online at: http://www2.epa.gov/region8/air-permit-public-comment-opportunities.

In addition to maintaining the docket in your office, please submit any written recommendations you may have concerning the terms and conditions of the draft permit to me at the following address:

Noreen Okubo
US EPA Region 8
Air Program, 8P-AR
1595 Wynkoop Street
Denver, CO 80202
(303)-312-6646

Should EPA not accept any or all of these recommendations, you will be notified in writing and will be provided with the reasons for not accepting them. Comments must be received by August 12, 2015, to be considered in the issuance of the final renewal permit for this facility. If a public hearing is held regarding this permit, you will be sent a copy of the public hearing notice at least 30 days in advance of the hearing date.

Sincerely,

Noreen Okubo

Noreen Okubo, Air Permit Engineer
Air Program

Enclosures

Notice of Intent to Issue Clean Air Act
Title V Federal Operating Permit
United States Environmental Protection Agency
Region 8, Air Program

Take notice that the United States Environmental Protection Agency (U.S. EPA) has received an application to issue an operating permit that regulates air pollution emissions from the following source located within the exterior boundaries of the Ute Mountain Ute Indian Reservation in San Juan County, New Mexico:

Castleton Commodities Incorporated San Juan LLC
Barker Creek Compressor Station

This source is required to obtain a Clean Air Act title V Permit to Operate in accordance with Part 71 of Title 40 of the Code of Federal Regulations. The permit contains all the Clean Air Act requirements that apply to the source and will require that the source conduct monitoring sufficient to enable U.S. EPA and the public to determine whether the source is complying with the air quality requirements that apply to it. This proceeding is subject to the administrative requirements of 40 CFR 71.11.

Members of the public may review copies of the draft permit prepared by U.S. EPA, the Statement of Basis for the draft permit, the application, and all supporting materials submitted by the source, at the San Juan County Clerk's Office in Aztec New Mexico, the Ute Mountain Ute Indian Tribe's Environmental Programs Office (124 Mike Walsh Road) Towaoc, Colorado, and at the U.S. EPA Region 8 office in Denver, Colorado. All documents will be available for review at the U.S. EPA Region 8 office Monday through Friday from 8:00 a.m. to 5:00 p.m. (excluding Federal holidays). Electronic copies of the draft permit and Statement of Basis may also be viewed at: http://www2.epa.gov/region8/air-permit-public-comment-opportunities.

If you have comments on the draft permit, you have 30 calendar days from the date of this notice to submit them. You have the right to request a public hearing on the draft permit. Requests for a public hearing must be made by the close of the 30-day public comment period, must include the issues proposed to be raised at the hearing, and must contain your reasons for requesting a hearing. If a public hearing is granted, the comment period will be extended through the date of the public hearing. All comments and public hearing requests should be addressed to Noreen Okubo, U.S. EPA, Region 8, Air Program (8P-AR), 1595 Wynkoop Street, Denver, CO 80202. All comments received on or before August 12, 2015 will be considered in arriving at a final decision on the permit. The final permit is a public record that can be obtained upon request. A statement of reasons for changes made to the draft permit and responses to comments received will be sent to persons who commented on the draft permit.

If you believe any conditions of the draft permit are inappropriate, you must raise all reasonably ascertainable issues and submit all reasonably ascertainable arguments supporting your position by the end of the comment period. Any supporting materials that you submit must be included in full and may not be incorporated by reference, unless they are already part of the administrative record for this permit proceeding or consist of tribal, or federal statutes and regulations, U.S. EPA documents of general availability, or other generally available referenced materials.

If you would like to be added to our mailing list to be informed of future actions on these or other Clean Air Act permits issued in Indian country, please send your name and address to Part 71 Lead, U.S. EPA Region 8, Air Program (8P-AR), 1595 Wynkoop Street, Denver, CO 80202-1129.

CCI San Juan, LLC - Barker Creek Compressor Station
TV Operating Permit #V-UM-0001-09.00
Summary of Requested Emission Rates

		NOx		CO		VOC		PM-10				HAPs		HCOH		GHG Calcs CO2	N2O	CH4	Total CO2e
Unit No.	**Unit Description**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**tpy**	**tpy**	**tpy**	**metric sho**
C-1101	Natural Gas Compressor Engine	44.1	193.1	33.5	146.5	1.4	6.0	0.1	0.44	0.01	0.03	0.15	0.67	0.15	0.67	4907.0	2.3	2.8	
FUG	Fugitive Emissions					0.05	0.20												
	Total	44.1	193.1	33.5	146.49	1.4	6.2	0.1	0.4	0.0	0.0	0.2	0.7	0.2	0.7				4912.0

NOTES

1 Emissions calcs are based on emission rates permitted by permit application dated December 2008
2 Emission rates are uncontrolled, operation of catalytic converter not enforceable (per current Title V Permit conditions).
3 Total HAPs = Largest single HAP, Formaldehyde (HCOH)
4 Total emission rates same as currently permitted rates

rt tpy

CCI San Juan, LLC
Barker Creek Compressor Station

Compressor Engine

Emission Unit Data

Source Description	Natural Gas Compressor Engine	
Manufacturer	Waukesha	
Model	L5794 GSI	
Serial No.	C-14422/1	
Emission Unit No.	C-1101	
Install Date	8/26/2003	Permit application
Regulatory Applicability	NSPS JJJJ Exempt Unit (Constructed prior to June 12 2006 trigger date); MACT ZZZZ Applicable, remote unit	

Engine Data

Engine horsepower	1380	hp	mfg data, max nameplate
Engine speed	1200	rpm	mfg data, max nameplate

Fuel Data

Fuel type	Natural Gas		
Fuel consumption	7650	BTU/hp-hr	2008 Application, supplier data
	10.557	MMBtu/hr	BTU/hp-hr * hp / (100000 Btu/MMBtu)
	1000	BTU/scf	Nominal
	10557	scf/hr	BTU/hp-hr / scf/BTU
	10.557	Mscf/hr	scf/hr * 1Mscf/1000 scf
Annual fuel usage	92.5	MMscf/yr	Based on 8760 hrs/yr usage

Emission Calculations

	NOx	CO	VOC	PM	SOx	HCOH	CO2	CH4	N2O		
Uncontrolled Emission Rates	14.5	11.0	0.45			0.05				g/hp-hr	Mfg. Data (previous application)
				9.50E-03	5.88E-04					lb/MMBtu	
	20010	15180	621			69				g/hr	g/hp-hr * hp
							53.06	1.00E-03	1.00E-04	kg/MMBtu	
							1	25	298	GWP	
	44.1	**33.5**	**1.37**	**0.10**	**0.006**	**0.15**				lb/hr	g/hr / (453.6 g/lb) or lb/MMBtu * MMBtu/hr
	193.2	**146.58**	**5.996**	**0.44**	**0.027**	**0.67**				tpy	based on 8760 hrs of operation
							560.2	**0.3**	**0.3**	CO2e, kg/hr	
							4907.0	**2.3**	**2.8**	CO2e, short ton/yr	
Actual Emission Rates	86.2	72.7								%	Catalyst Control Efficiency
	6.1	9.1	1.4	0.1	0.006	0.2					
	26.7	40.0	6.0	0.4	0.027	0.7	4912.0			CO2 calculated as CO2e	

1 Emission rates for NOx CO, VOCs, THC and HCOH based on data provided in the initial permit application, from manufacturers' and stack test data.
where,
lb/hr = g/hp-hr * hp/ (453.6 g/lb)
2 Catalyst efficiencies based on data provided in Title V Permit application. Operation of Catalytic Converter is not enforceable.
3 GWP = Global Warming Potential factors, from Table A-1 of 40 CFR 98, represents the CO2e multiplier for the amount of CO2 equivalent for each pollutant.
4 CO2 emission factor from Table C-1 of Subpart C, 40 CFR 98, CO2 emission factors and high heat values for various types of fuel.
5 CH4 and N2O emission factor from Table C-2 of Subpart C, 40 CFR 98, Default CH4 and N2O emission factors and high heat values for various types of fuel.
6 CO2e emissions calculated by multiplying hourly heat rate (MMBtu/hr) by emission factor and by GWP
53.06 kg CO2/mmBTU * 10.557 mmBTU/hr * 1 (GWP) = 1232.34 kg/hr CO2e
7 CO2e Metric short ton/yr calculated by multiplying kg/hr * hours/yr operation and dividing by 1000 (kg/metric short ton)
(560.15 kg/hr * 8760 hr/yr) / (1000 kg/MST) = 4906 short ton/yr
8 Total CO2e calculated by adding CO2e from CO2 + N2O+ CH4 together
4907+2.3+2.8 = 4912 short tons CO2e

CCI San Juan, LLC
Barker Creek Compressor Station

Fugitive Emissions

Emission Unit Data
Source Descripti Fugitive Emissions
Emission Unit N FUG
Gas Analysis 15.09 wt% VOC (non C1, C2) Initial Permit application

Emission Calculations

Emission S	Emission Factor (lb/day/source)	Number of Sources	mission Rate lb/hr	tpy
Gas Valves	0.238099	10	0.015	0.066
Light Liqui	0.132000	14	0.012	0.051
Relief Valv	0.465616	3	0.009	0.038
Liquid Flan	0.005832	40	0.001	0.006
Open Ende	0.105822	2	0.001	0.006
Compressc	0.465616	1	0.003	0.013
Pump Seal	0.126986	1	0.001	0.003
Gas Flange	0.020635	32	0.004	0.018
			0.046	**0.202**

NOTES

1 Emission factors taken from previous permit applicatio n (API Average Emission Factors for Oil and Gas Productio n Operation s)

Where
Emission Rate (lb/hr) = wt% VOC * Factor (lb/day/source) * # sources /24 (hrs/day)
Emission rate (tpy) = lb/hr * (8760 hrs/yr) /(2000 lb/ton)

From: (505) 837-6536
Deonna Hernandez
WESTON SOLUTIONS
3840 Commons Ave., NE

Albuquerque, NM 87109

Origin ID: ABQA

FedEx Express

J142214092303uv

Ship Date: 01OCT14
ActWgt: 1.0 LB
CAD: 3379826/INET3550

Delivery Address Bar Code

SHIP TO: (505) 837-6536 BILL SENDER

Scoh Clow Envir. Director
Ute Mtn Ute Tribe
520 Sunset Blvd.

TOWAOC, CO 81334

Ref #
Invoice #
PO #
Dept #

THU - 02 OCT 4:30P
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TRK# 0201 7713 5109 4781

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81334
CO-US
ABQ

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From: (505) 837-6536
Deonna Hernandez
WESTON SOLUTIONS
3840 Commons Ave., NE

Albuquerque, NM 87109

Origin ID: ABQA

FedEx Express

J142214092303uv

Ship Date: 01OCT14
Act/Wgt: 1.0 LB
CAD: 3379826/INET3550

Delivery Address Bar Code

SHIP TO: (505) 837-6536

BILL SENDER

U.S. EPA
Air Program, 8P-AR
1595 Wynkoop Street

DENVER, CO 80202

Ref #
Invoice #
PO #
Dept #

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STANDARD OVERNIGHT

TRK# 7713 5081 6750
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3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.
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Weston Solutions, Inc.
3840 Commons Ave. NE
Albuquerque, NM 87123
(505) 837-6550 (office)
(505) 837-6595 (Fax)

1 October 2014

Part 71 Permit Contact
Air Program, 8P-AR
U.S. Environmental Protection Agency
1595 Wynkoop Street
Denver, CO 80202-1129

RE: Part 71 Permit Renewal Application
Barker Creek Compressor Station, Title V Operating Permit #V-UM-0001-09.00

Dear Permit Contact,

On behalf of Castleton Commodities Incorporated (CCI) San Juan LLC, Weston Solutions Inc. are submitting this application for renewal of a Part 71 federal operating permit for the Barker Creek Compressor Station located in San Juan County, NM. The compressor station is located on Ute Mountain Indian Reservation, and currently operates under federal part 71 operating permit V-UM-0001-09.00.

Note that the plant was owned and operated by Western Gas Resources (WGR) until May 31, 2014 when it was purchased by CCI San Juan LLC. Notification of the change of ownership was submitted to EPA Region 8 in May, 2014.

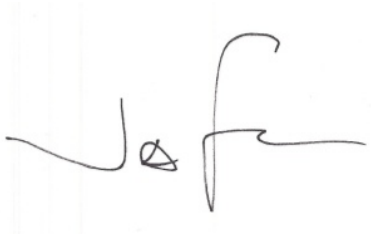
Please find the following documents enclosed with this submittal:

- A description of the application and activities taking place at the facility; and
- Part 71 Operating Permit Renewal Forms, including a signed certification form.

A copy of this submittal is also being sent to the Environmental Director of the Ute Mountain Ute Tribe. CCI San Juan LLC are investigating revising this permit to synthetic minor status, and will submit a separate application if they elect to do so.

Please contact Leann Plagens at (281) 378-1257 (Leann.Plagens@cci.com), or me at (505) 837-6579 (jane.cudney-black@westsonsolutions.com) if you have any questions or need additional information.

Very truly yours,
WESTON SOLUTIONS, INC.



Jane Cudney-Black
Senior Project Manager

Cc: Scott Clow, Environmental Director, Ute Mountain Ute Tribe
CCI San Juan LLC

40 CODE OF FEDERAL REGULATION PART 71
FEDERAL OPERATING PERMIT
RENEWAL APPLICATION

BARKER CREEK COMPRESSOR STATION
Permit #V-UM-0001-09.00

CCI San Juan LLC
811 Main Street, Suite 3500
Houston, TX 77002

INITIAL PERMIT ISSUE DATE: MARCH 25 2010
EFFECTIVE DATE: APRIL 4, 2010
EXPIRATION DATE: APRIL 4, 2015

TABLE CONTENTS

LIST OF TABLES

1 PURPOSE AND SCOPE

This is a renewal application for a Part 71 permit issued to CCI San Juan LLC for the Barker Creek Compressor Station located within the exterior boundaries of the Ute Mountain Indian Reservation, in San Juan County, New Mexico. The location of the facility is within Indian country, as defined at Section 18 of US Code (USC) §1151, accordingly, this application is submitted to US EPA Region 8 (the issuing agency for the initial permit).

The effective date of this permit commenced April 4, 2010; the effective expiration date for this permit is April 4, 2015. This application is being submitted 6 months prior to the expiration date in accordance with §40 CFR 71.7(a)(1)(iii).

This application is submitted in satisfaction of the requirements outlined in §40 CFR 71.7, *Permit Issuance, renewal, reopenings, and revisions*. Forms that are submitted with this application are listed in Table 1.1 below.

Table 1-1 Permit Application Forms

Form Name	Description
GIS	General Information and Summary
EUD-1,	Emissions Unit Description for Fuel Combustion Sources (Unit C-1101)
IE	Insignificant Emissions (Unit FUG)
EMISS	Emissions Calculations
PTE	Potential to Emit Summary
CTAC	Certification of Truth, Accuracy, and Completeness

1.1 Site Description

The facility consists of the following sources:

- One Waukesha L5794 GSI 180 hp natural gas compressor engine (Unit C-1101)
- Fugitive emissions associated with a natural gas compressor station (FUG)

The facility is a natural gas compressor station, natural gas and liquids enters the facility, liquids are routed offsite and natural gas is compressed and sent to the sales pipeline.

1.2 Regulatory Applicability

The facility has uncontrolled Potential To Emit (PTE) emissions greater than 100 tpy and is categorized as a major source under Title V. The compressor unit normally operates with a catalytic converter, but the use of this control device is not required by regulation and thus does not count toward a reduction in the facility's PTE emission summary. Potential applicability to the most commonly applicable federal regulations is discussed below:

- **NESHAPs (MACT):** The facility is an area source of HAPs, and is not a major source of Hazardous Air Pollutants (HAPs). The facility is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAPs) Maximum Achievable Control Technology (MACT) ZZZZ. Revisions to MACT ZZZZ have become effective since the permit was initially issued, our review of MACT ZZZZ indicates that the unit is now subject to MACT ZZZZ. However the facility meets the criteria for "Remote stationary RICE" under 40 CFR 63.6675, and is subject to the requirements accordingly.
- **NSPS:** The engine was constructed prior to the promulgation of New Source Performance Standards (NSPS) JJJJ, this regulation does not apply. There are currently no NSPS which apply to units at the facility.
- **CAM:** An emission unit is potentially subject to the Compliance Assurance Monitoring (CAM) rule if it has specific emission standards or limitations described in the rule, or uses a control device to achieve compliance with limits or standards. The facility has no emission units subject to emission standards or limitations, and does not take credit for use of the control device on the compressor. CAM does not apply.
- **Chemical Accident Prevention Program –** the facility does not process, use, manufacture, store or otherwise handle substances regulated by this rule, and is not subject to the requirement to submit a Risk Management Plan (RMP).
- **Stratospheric Ozone and Climate Protection –** The facility does not include air conditioning units subject to §40 CFR 82 Subpart F, and does not include any halon fire extinguishers subject to §40 CFR 82 Subpart H. These regulations do not apply.

2 PART 71 APPLICATION FORMS

The following is a discussion of the forms included in this application, and a summary of the information provided in each form. There have been no changes to emission units at the facility since the initial permit was issued, no renovations or demolition activities have occurred at the facility.

The initial permit was issued to Western Gas Resources. The facility was acquired by CCI San Juan LLC and an administrative revision to the permit updating the change in ownership was filed with EPA Region 8 at the end of May, 2014. This renewal application also reflects this change.

Form GIS

Data provided on form GIS is updated to include information from the new owners and plant contacts of the facility, CCI San Juan LLC. Location information is unchanged.

Facility-wide PTE and applicable requirements are unchanged from the facility's existing Operating Permit, no new regulations apply to the facility at this time. Emission calculations and other data for each emission unit are also unchanged at this time. Facility-wide emission rates are rounded to the nearest 0.1 TPY.

Form EUD-1

The facility includes one 1380hp Waukesha 5794 GSI natural gas compressor engine. Information provided on form EUD-1 regarding this emission unit is unchanged from the existing permit and the previous permit application. No changes have occurred to any fuel combustion sources at the facility. Supporting data for this unit is copied from the previous application, and attached with this renewal application for review.

Form IE

The facility includes fugitive emissions from activities at this compressor station. The emissions of fugitives are insignificant (less than 2 TPY). Emissions from fugitives from this facility are calculated for the EMISS and PTE forms, calculations are provided with this application. The facility does not include any other emission sources or activities that are exempted from otherwise applicable requirements.

Form EMISS

Actual emissions for unit C-1101 are calculated assuming operation of a catalytic convertor, calculations for each emission unit are provided in the attachments, and are unchanged from the initial permit application.

PTE Calculations for unit C-1101 are shown here identical to the existing permit application, no changes have occurred to the facility. A calculation is provided as an attachment, along with the supporting data provided with the previous permit application.

PTE and Actual calculations for unit FUG are copied forward from the previous permit application, no changes are made to these assumptions.

Note that the emission rates on this form are rounded to the nearest tenth of a pound and nearest tenth of a ton on these forms.

Form PTE

Total PTE emissions are calculated here, using the same assumptions and emission factors as provided in the initial permit application. Emission rates shown here are the same as those shown in forms EMISS, EUD-1, and IE.

Note that emission rates on this form are rounded to the nearest 0.1 TPY. Emission unit C-1101 is identified as a major emitting unit for two pollutants (NOx and CO). While this unit operates normally with a catalytic converter which controls NOx and CO, the use of this device is not enforceable and credit for reduced emissions are not taken in this application. Additionally, Emission unit FUG, while insignificant, is included in the emission totals for the facility.

Supporting data from the previous permit application is copied here in support of these calculations.

Form CTAC

As this facility has recently changed ownership, this form is signed and certified by the new Responsible Official. The contact details for the current RO are updated by this form.

2.1 - Form GIS

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

GENERAL INFORMATION AND SUMMARY (GIS)

A. Mailing Address and Contact Information

Facility name Barker Creek Compressor Station

Mailing address: Street or P.O. Box 811 Main Street, Suite 3500

City Houston State TX ZIP 77002-

Contact person: Ryan Kelly Title Safety Specialist

Telephone (505) 598 - 5601 Ext.

Facsimile (505) 598 - 6210

B. Facility Location

Temporary source? ___Yes _X__No Plant site location NW ¼ Section 2, T32N, R14 W, San Juan County, New Mexico

City Kirtland State NM County San Juan EPA Region 8

Is the facility located within:

Indian lands? _X_YES ___ NO OCS waters? ___YES __X_ NO

Non-attainment area? ___ YES __X__NO If yes, for what air pollutants? _____

Within 50 miles of affected State? __X_ YES __ NO If yes, What State(s)? _CO, AZ, UT____

C. Owner

Name CCI San Juan LLC Street/P.O. Box 811 Main Street, Suite 3500

City Houston State TX ZIP 77002 -

Telephone (281) 378 - 1100 Ext

D. Operator

Name CCI San Juan LLC Street/P.O. Box 99 County Road 6500

City Kirtland State NM ZIP 87417 -

Telephone (505) 598 - 5601 Ext

E. Application Type

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

___Initial Permit _X__ Renewal ___ Significant Mod ___ Minor Permit Mod(MPM)

___ Group Processing, MPM ___ Administrative Amendment

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

For permit renewal, what is the expiration date of current permit? __04___/_04___/_2015____

F. Applicable Requirement Summary

Mark all types of applicable requirements that apply.

___ SIP ___ FIP/TIP ___ PSD ___Non-attainment NSR

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

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

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

___ Tank Vessel requirements, sec. 183(f)) ___ Section 129 Standards/Requirement

___ Consumer / comm.. products, ' 183(e) ___ NAAQS, increments or visibility (temp. sources)

Has a risk management plan been registered? ___YES _X__NO Regulatory agency _____

Phase II acid rain application submitted? ___YES _X__NO If yes, Permitting authority _____

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

Cite and describe any emissions-limiting requirements and/or facility-wide "generic" applicable requirements.

Must submit an annual emissions inventory and calculate an annual fee(40 CFR §71.9(h)(1) and (2))
Must pay annual fee by April 1 each year (40 CFR §71.9(h) and 40 CFR §71.6(a)(7)
Recordkeeping requirements (40 CFR §71.6(a)(3)(ii)
General Reporting Requirements (40 CFR §71.6(a)(3)(iii)), Alternative Operating Scenarios (40 CFR §71.6(a)(9))
Permit Shield (40 CFR §71.6(f)(3))

H. Process Description

List processes, products, and SIC codes for the facility.

Process	Products	SIC
Natural gas compressor station – separates gases and liquids, routes gas to pipeline via compressor.	Residue gas (to pipeline), produced water, liquids	1311

I. Emission Unit Identification

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

Emissions Unit ID	Description of Unit
C-1101	Waukesha L5794GSI 1380 hp rich burn compressor engine
	Catalytic convertor for C-1101 (not enforceable)
FUG	Site Fugitive emissions

J. Facility Emissions Summary

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 __193.1_____ tons/yr VOC __6.2_____ tons/yr SO2 __0.0_____ tons/yr

PM-10 ___0.0_____ tons/yr CO _146.5_____ tons/yr Lead __0.0_____ tons/yr

Total HAP __0.7_____ tons/yr

Single HAP emitted in the greatest amount ____Formaldehyde (HCOH)_____ PTE 0.7__ tons/yr

Total of regulated pollutants (for fee calculation), Sec. F, line 5 of form FEE _346.5__ tons/yr

K. Existing Federally-Enforceable Permits

Permit number(s) _V-UM-0001-09.00__ Permit type _Operating___ Permitting authority _US EPA__

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

L. Emission Unit(s) Covered by General Permits

Emission unit(s) subject to general permit __N/A_____

Check one: ___ Application made ___ Coverage granted

General permit identifier _____ Expiration Date ____/____/____

M. Cross-referenced Information

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

INSTRUCTIONS FOLLOW

2.2 - Form EUD-1

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID C-1101 Description Waukesha L5794GSI 1380 hp Compressor Engine

SIC Code (4-digit) 1311 SCC Code 20200253

B. Emissions Unit Description

Primary use Natural Gas Compression Temporary Source ___Yes _X__No

Manufacturer Waukesha Model No. L5794GSI

Serial Number C-14422/1 Installation Date 08 / 26 / 2003

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) Natural Gas Compressor Engine

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

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input 3.0 MM BTU/hr Max. Design Heat Input 3.51 MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural Gas Standby fuel type(s) N/A

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural Gas	0	0	1034.5 Btu/scf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas	N/A	10.5 MMBtu/hr	92.5 MMBtu/hr

E. Associated Air Pollution Control Equipment

Emissions unit ID C-1011 Device type Catalytic Converter

Air pollutant(s) Controlled NOx, CO Manufacturer Miratech

Model No. EQY1251-14-C1 Serial No. EQY1011

Installation date 08 / 26 / 2003 Control efficiency (%) NOx: 86.2%; CO: 72.7%

Efficiency estimation method Manufacturer's Data

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common). **N/A**

Stack height (ft) _____._____	Inside stack diameter (ft) _____._____
Stack temp(^{o}F) _____._____	Design stack flow rate (ACFM) _____._____
Actual stack flow rate (ACFM) _____._____	Velocity (ft/sec) _____._____

2.3 - Form IE

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

INSIGNIFICANT EMISSIONS (IE)

On this page list each insignificant activity or emission unit. In the "number" column, indicate the number of units in this category. Descriptions should be brief but unique. Indicate which emissions criterion of part 71 is the basis for the exemption.

Number	Description of Activities or Emissions Units	RAP, except HAP	HAP
FUG	Fugitive Emissions	X	

2.4 - Form EMISS

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

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 C-1101

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
NOx	26.7	44.1	193.2	N/A
CO	40	33.5	146.6	N/A
VOC	6.0	1.4	6.0	N/A
SO2	0	0	0	N/A
PM10	0.4	0.1	0.4	N/A
Formaldeyde	0.7	0.2	0.7	50000

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

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 FUG

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
VOC	0.2	0.05	0.2	N/A

2.5 - Form PTE

United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

POTENTIAL TO EMIT (PTE)

For each unit with emissions that count towards applicability, list the emissions unit ID and the PTE for the air pollutants listed below and sum them up to show totals for the facility. You may find it helpful to complete form **EMISS** before completing this form. Show other pollutants not listed that are present in major amounts at the facility on attachment in a similar fashion. You may round values to the nearest tenth of a ton. Also report facility totals in section **J** of form **GIS**.

Emissions Unit ID	Regulated Air Pollutants and Pollutants for which the Source is Major (tons/yr)						
	NOx	VOC	SO2	PM10	CO	Lead	HAP
C-1101	**193.1 MU**	6.0	0.0	0.4	**146.5 MU**	-	0.7
FUG	-	0.2	-	-	-	-	-
Facility Totals	**193.1**	6.2	0.0	0.4	**146.5**	-	0.7

2.6 - Form CTAC

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 6/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Burmaster (First) Brad (MI) ____

Title Vice President / General Manager

Street or P.O. Box 811 Main Street, Suite 3500

City Houston State TX ZIP 77002 - ____

Telephone (281) 378 - 1100 Ext. ____ Facsimile (___) ____ - ____

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, 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 (typed) Brad Burmaster Date: 09 / 23 / 2014

3 SUPPORT DATA

Data in this section is copied forward from the initial permit application, and includes emission calculations and manufacturer's information supplied with the initial application.

CCI San Juan, LLC - Barker Creek Compressor Station
TV Operating Permit #V-UM-0001-09.00
Summary of Requested Emission Rates

		NOx		CO		VOC		PM-10		SO_2		HAPs		HCOH	
Unit No.	**Unit Description**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**	**lb/hr**	**tpy**
C-1101	Natural Gas Compressor Engine	44.1	193.1	33.5	146.5	1.4	6.0	0.1	0.44	0.01	0.03	0.15	0.67	0.15	0.67
FUG	Fugitive Emissions					0.05	0.20								
	Total	44.1	193.1	33.5	146.49	1.4	6.2	0.1	0.4	0.0	0.0	0.2	0.7	0.2	0.7

NOTES

1 Emissions calcs are based on emission rates permitted by permit application dated December 2008
2 Emission rates are uncontrolled, operation of catalytic converter not enforceable (per current Title V Permit conditions).
3 Total HAPs = Largest single HAP, Formaldehyde (HCOH)
4 Total emission rates same as currently permitted rates

CCI San Juan, LLC
Barker Creek Compressor Station

Compressor Engine

Emission Unit Data

Source Description	Natural Gas Compressor Engine	
Manufacturer	Waukesha	
Model	L5794 GSI	
Serial No.	C-14422/1	
Emission Unit No.	C-1101	
Install Date	8/26/2003	Permit application
Regulatory Applicability	RICE MACT and NSPS JJJJ Exempt Unit (Constructed prior to June 12 2006 trigger date)	

Engine Data

Engine horsepower	1380	hp	mfg data, max nameplate
Engine speed	1200	rpm	mfg data, max nameplate

Fuel Data

Fuel type	Natural Gas		
Fuel consumption	7650	BTU/hp-hr	2008 Application, supplier data
	10.557	MMBtu/hr	BTU/hp-hr * hp / (100000 Btu/MMBtu)
	1000	BTU/scf	Nominal
	10557	scf/hr	BTU/hp-hr / scf/BTU
	10.557	Mscf/hr	scf/hr * 1Mscf/1000 scf
Annual fuel usage	92.5	MMscf/yr	Based on 8760 hrs/yr usage

Emission Calculations

	NOx	CO	VOC	PM	SOx	HCOH		
Uncontrolled Emission Rates	14.5	11.0	0.45			0.05	g/hp-hr	Mfg. Data (previous application)
				9.50E-03	5.88E-04		lb/MMBtu	AP-42 Section 3.3
	20010	15180	621			69	g/hr	g/hp-hr * hp
	44.1	**33.5**	**1.37**	**0.10**	**0.006**	**0.15**	lb/hr	g/hr / (453.6 g/lb) or lb/MMBtu * MMBtu/hr
	193.2	**146.58**	**5.996**	**0.44**	**0.027**	**0.67**	tpy	based on 8760 hrs of operation
Actual Emission Rates	86.2	72.7					%	Catalyst Control Efficiency
	6.1	9.1	1.4	0.1	0.006	0.2		
	26.7	40.0	6.0	0.4	0.027	0.7		

1 Emission rates for NOx CO, VOCs, THC and HCOH based on data provided in the initial permit application, from manufacturers' and stack test data.
where,
lb/hr = g/hp-hr * hp/ (453.6 g/lb)

2 Catalyst efficiencies based on data provided in Title V Permit application. Operation of Catalytic Converter is not enforceable.

CCI San Juan, LLC
Barker Creek Compressor Station

Fugitive Emissions

Emission Unit Data
Source Description Fugitive Emissions
Emission Unit No. FUG
Gas Analysis 15.09 wt% VOC (non C1, C2) Initial Permit application

Emission Calculations

Emission Source	Emission Factor (lb/day/source)	Number of Sources	Emission Rate lb/hr	Emission Rate tpy
Gas Valves	0.238099	10	0.015	0.066
Light Liquid Valves	0.132000	14	0.012	0.051
Relief Valves	0.465616	3	0.009	0.038
Liquid Flanges / Connections	0.005832	40	0.001	0.006
Open Ended Lines	0.105822	2	0.001	0.006
Compressor Seals	0.465616	1	0.003	0.013
Pump Seals	0.126986	1	0.001	0.003
Gas Flanges / Connections	0.020635	32	0.004	0.018
			0.046	**0.202**

NOTES

1 Emission factors taken from previous permit application (API Average Emission Factors for Oil and Gas Production Operations)

Where
Emission Rate (lb/hr) = wt% VOC * Factor (lb/day/source) * # sources /24 (hrs/day)
Emission rate (tpy) = lb/hr * (8760 hrs/yr) /(2000 lb/ton)

Site Fugitive Emissions

for

Barker Creek Compressor Station

0.34 (NON - C1) TONS/Yr **0.20** (NON - C1,C2) TONS/Yr **0.00** (H2S) TONS/Yr

	(NON - C1)	(NON - C1,C2)	H2S
VOC CONTENT IN INLET GAS (WT %) =	25.48	15.09	0

FUGITIVE EMISSION SOURCES	STREAM COMPOSITION INLET	EMIS. FACTOR * (LB/DAY/SOURCE)	NUM. OF SOURCES	CONTROL METHOD	CONTROL EFF.	CONTROLLED EMISSIONS (LB/HR) (NON - C1)	(T/Y)	(LB/HR) (NON - C1,C2)	(T/Y)	(LB/HR) (H2S)	(T/Y)
GAS VALVES		0.238099	10	A	0	0.025	0.111	0.015	0.066	0.000	0.000
LIGHT LIQUID VALVES		0.132	14	A	0	0.077	0.086	0.012	0.051	0.000	0.000
RELIEF VALVES		0.465616	3	A	0	0.015	0.065	0.009	0.038	0.000	0.000
LIQUID FLANGES/CONNECTIONS		0.005832	40	A	0	0.010	0.011	0.001	0.006	0.000	0.000
OPEN-ENDED LINES		0.105822	2	A	0	0.009	0.010	0.001	0.006	0.000	0.000
COMPRESSOR SEALS		0.465616	1	A	0	0.005	0.022	0.003	0.013	0.000	0.000
PUMP SEALS		0.126986	1	A	0	0.005	0.006	0.001	0.003	0.000	0.000
GAS FLANGES/CONNECTIONS		0.020635	32	A	0	0.007	0.031	0.004	0.018	0.000	0.000
				TOTAL OF FUGITIVE EMISSIONS (IN T/Y) =			0.341	0.046054037	0.202	0	0.000

* (TAKEN FROM API Avgerage Emission factors for Oil and Gas Production Operations)

CONTROL METHOD EXPLANATION

A = NO CONTROL

B = QUARTERLY LEAK DETECTION AND REPAIR PROGRAM, 75% REDUCTION ON CHECKED ITEMS

C = OPEN ENDED VALVES CAPPED OR BLINDED, 100 % REDUCTION

D = RELIEF VALVES CONNECTED TO FLARE SYSTEM, 100 % REDUCTION

E = COMPRESSOR SEAL LEAKS CONTAINED AND RECYCLED TO PROCESS, 100 % REDUCTION

F = CLOSED SAMPLING LOOPS, 100 % REDUCTION

G = FLANGE INSPECTION AND REPAIR QUARTERLY, 30% REDUCTION

Fuel Gas Composition (mol %)

		MW		WT %	HYDROCARBON WT % COMPOSITION	HYDROCARBON COMPOSITION LHV	LHV
N2	0.932	28	26.102	1.357			
CO2	0.542	44	23.861	1.240			
C1	86.475	16	1383.605	71.925	71.93	909.4	786.406
C2	6.659	30	199.776	10.385	10.39	1618.7	107.792
C3	3.005	44	132.224	6.874	6.87	2314.9	69.565
IC4	0.521	58	30.195	1.570	1.57	3000.4	15.620
NC4	0.887	58	51.446	2.674	2.67	3010.8	26.706
IC5	0.303	72	21.845	1.136	1.14	3699.37	11.224
NC5	0.244	72	17.597	0.915	0.91	3706	9.057
C6	0.430	86	37.014	1.924	1.92	4403.8	18.954
C7+	0.000	100	0.000	0.000	0.00	5100	0.000
H2S	0.000	34	0	0	0.00		
	100.00		1923.66	98.64	97.40		1045.33

	(NON - C1)	(NON - C1,C2)	NON C2 RATIO
VOC PERCENTAGE =	25.48	15.09	0.59

Engine Emissions

for

Barker Creek Compressor Station

11/20/08

Engine Information:

Engine Information:
Unit #: C-1011
Model NO. #: 5794GSI

Emission Point: C-1011 UNCONTROLLED PTE EMISSIONS
Manufacturer: Waukesha
Manufacturer Operating Range
Horse Power 1380 hp
Speed (RPM) 1200 rpm
BSFC 7650 BTUhp-hr

Emission Data:

	lbs/hr	tons/yr
NOx	44.084	193.0965
CO	33.443	146.4870
VOC	1.368	5.9927
HCHO	0.152	0.6659
SO2	0.006	0.0272
PM10	0.100	0.4393

Full Load Emissions Data:

NOx	14.5000	gm/hp-hr	Man. Data
CO	11.0000	gm/hp-hr	Man. Data
VOC (C3+)	0.4500	gm/hp-hr	Man. Data
THC	2.9000	gm/hp-hr	Man. Data
HCHO	0.0500	gm/hp-hr	Man. Data
SO2	5.88E-04	lb/MMBtu	Based on AP-42
PM10	9.50E-03	lb/MMBtu	Based on AP-42

Engine Information:
Unit #: C-1011
Model NO. #: 5794GSI

Emission Point: C-1011 2007 ACTUAL EMISSIONS
Manufacturer: Waukesha
Manufacturer Operating Range
Horse Power 1380 hp
Speed (RPM) 1200 rpm
BSFC 7650 BTUhp-hr
Runtime 8135 hrs

Emission Data:

	lbs/hr	tons/yr
NOx	2.993	13.1089
CO	2.965	12.9852
VOC	1.271	5.5651
HCHO	0.141	0.6183
SO2	0.006	0.0252
PM10	0.100	0.4079

Full Load Emissions Data:

NOx	1.0600	gm/hp-hr	Stack Test data
CO	1.0500	gm/hp-hr	Stack Test data
VOC (C3+)	0.4500	gm/hp-hr	Man. Data
THC	2.9000	gm/hp-hr	Man. Data
HCHO	0.0500	gm/hp-hr	Man. Data
SO2	5.88E-04	lb/MMBtu	Based on AP-42
PM10	9.50E-03	lb/MMBtu	Based on AP-42

C-1011
5794GSI

Emission Point: C-1011 2003 ACTUAL EMISSIONS
Manufacturer: Waukesha
Manufacturer Operating Range
Horse Power 1380 hp
Speed (RPM) 1200 rpm
BSFC 7650 BTUhp-hr
Runtime 2985 hrs

Emission Data:

	lbs/hr	tons/yr
NOx	0.901	3.9479
CO	1.264	5.5361
VOC	0.466	2.0420
HCHO	0.052	0.2269
SO2	0.006	0.0093
PM10	0.100	0.1497

0.8700	gm/hp-hr	Catalytic Converter installed
1.2200	gm/hp-hr	Catalytic Converter installed
0.4500	gm/hp-hr	Man. Data
2.9000	gm/hp-hr	Man. Data
0.0500	gm/hp-hr	Man. Data
5.88E-04	lb/MMBtu	Based on AP-42
9.50E-03	lb/MMBtu	Based on AP-42

Barker Creek Compressor Station
11/20/08

UNCONTROLLED PTE EMISSIONS

	NOx	CO	SO2	PM10	HCHO	VOC
C-1011	193.097	146.487	0.027	0.439	0.666	5.993
FUG	0.000	0.000	0.000	0.000	0.000	0.202
Total	**193.097**	**146.487**	**0.027**	**0.439**	**0.666**	**6.194**

2007 ACTUAL EMISSIONS

	NOx	CO	SO2	PM10	HCHO	VOC
C-1011	13.109	12.985	0.025	0.408	0.618	5.565
FUG	0.000	0.000	0.000	0.000	0.000	0.202
Total	**13.109**	**12.985**	**0.025**	**0.408**	**0.618**	**5.767**

2006 ACTUAL EMISSIONS

	NOx	CO	SO2	PM10	HCHO	VOC
C-1011	11.386	15.967	0.027	0.432	0.654	5.889
FUG	0.000	0.000	0.000	0.000	0.000	0.202
Total	**11.386**	**15.967**	**0.027**	**0.432**	**0.654**	**6.091**

2005 ACTUAL EMISSIONS

	NOx	CO	SO2	PM10	HCHO	VOC
C-1011	11.344	15.907	0.027	0.430	0.652	5.867
FUG	0.000	0.000	0.000	0.000	0.000	0.202
Total	**11.344**	**15.907**	**0.027**	**0.430**	**0.652**	**6.069**

2004 ACTUAL EMISSIONS

	NOx	CO	SO2	PM10	HCHO	VOC
C-1011	11.368	15.941	0.027	0.431	0.653	5.880
FUG	0.000	0.000	0.000	0.000	0.000	0.202
Total	**11.368**	**15.941**	**0.027**	**0.431**	**0.653**	**6.081**

2003 ACTUAL EMISSIONS

	NOx	CO	SO2	PM10	HCHO	VOC
C-1011	3.948	5.536	0.009	0.150	0.227	2.042
FUG	0.000	0.000	0.000	0.000	0.000	0.069
Total	**3.948**	**5.536**	**0.009**	**0.150**	**0.227**	**2.111**

2008 Fees **19.3088775 tpy**
$43.40 per ton

$824.60

2007 Fees **17.936043 tpy**
$42.43 per ton

$763.74

2006 Fees **17.8696569 tpy**
$40.84 per ton

$735.12

2005 Fees **17.9067355 tpy**
$39.61 per ton

$712.98

2004 Fees **6.21759906 tpy**
$38.72 per ton

$232.32

Total Fees Due **$3,268.76**

HEAT REJECTION AND OPERATING DATA — MODEL L5794GSI
130° F AUX. WATER TEMPERATURE
180° F JACKET WATER TEMPERATURE

	BMEP (PSI)	ENGINE SPEED — RPM					
		700	800	900	1000	1100	1200
POWER (BHP)	173	—	1010	1135	1265	1390	1515
	158	805	920	1035	1150	1265	1380
	140	716	819	921	1023	1125	1228
	120	614	702	789	877	965	1052
	100	512	585	658	731	804	877
	80	409	468	526	585	643	702
BRAKE SPEC FUEL CONSUMPTION (BTU/BHP-HR)	173	—	7287	7346	7406	7474	7531
	158	7350	7402	7460	7521	7592	7650
	140	7515	7563	7620	7682	7756	7817
	120	7764	7807	7861	7925	8004	8070
	100	8112	8147	8199	8265	8351	8423
	80	8635	8658	8705	8775	8871	8952
FUEL CONSUMPTION (BTU/HR X 1000)	173	—	7360	8345	9350	10380	11410
	158	5915	6810	7720	8650	9605	10560
	140	5380	6190	7015	7860	8730	9600
	120	4765	5475	6205	6950	7720	8490
	100	4150	4765	5390	6040	6715	7385
	80	3535	4050	4580	5130	5705	6280
HEAT TO JACKET WATER (BTU/HR X 1000)	173	—	2240	2510	2785	3065	3345
	158	1855	2105	2360	2615	2880	3140
	140	1725	1955	2190	2425	2665	2910
	120	1575	1785	1995	2205	2425	2645
	100	1428	1610	1795	1985	2185	2380
	80	1280	1438	1600	1765	1940	2115
HEAT TO LUBE OIL (BTU/HR X 1000)	173	—	304	355	407	460	512
	158	240	289	339	388	439	490
	140	226	273	320	367	416	465
	120	209	253	298	343	390	436
	100	193	234	276	319	363	407
	80	176	215	255	295	337	378
HEAT TO INTERCOOLER (BTU/HR X 1000)	173	—	47.5	75.5	106	142	178
	158	8.5	31.5	57	85	119	152
	140	-5.5	14	36	61.5	92.5	123
	120	-22	-6	12.5	34.5	61.5	89
	100	-37.5	-26	-11.5	7	31	55
	80	-53.5	-46	-34.5	-20	—	20.5
HEAT TO RADIATION (BTU/HR X 1000)	173	—	536	571	606	637	669
	158	487	522	557	591	622	653
	140	470	506	540	573	603	634
	120	450	484	517	550	580	609
	100	427	460	493	524	553	583
	80	403	435	466	496	525	553

DRESSER Waukesha

HEAT REJECTION AND OPERATING DATA MODEL L5794GSI 130° F AUX. WATER TEMPERATURE 180° F JACKET WATER TEMPERATURE	EN: 124175 DATE: 11/01	Ref. S 6124-70

HEAT REJECTION AND OPERATING DATA — MODEL L5794GSI
130° F AUX. WATER TEMPERATURE
180° F JACKET WATER TEMPERATURE

	BMEP (PSI)	ENGINE SPEED — RPM					
		700	800	900	1000	1100	1200
TOTAL ENERGY IN EXHAUST (BTU/HR X 1000)	173	—	1830	2135	2455	2790	3140
	158	1398	1665	1945	2240	2545	2865
	140	1244	1483	1735	2000	2275	2565
	120	1073	1279	1497	1730	1970	2220
	100	908	1082	1269	1466	1675	1890
	80	751	896	1050	1215	1389	1570
EXHAUST TEMP AFTER TURBINE (± 50° F)	173	—	1034	1067	1097	1123	1149
	158	983	1019	1052	1083	1109	1135
	140	964	1000	1034	1065	1092	1118
	120	938	975	1010	1041	1068	1095
	100	910	947	982	1014	1041	1068
	80	878	916	951	983	1011	1039
INDUCTION AIR FLOW (SCFM)	173	—	1325	1500	1680	1865	2050
	158	1065	1225	1390	1555	1725	1900
	140	970	1115	1260	1415	1570	1725
	120	855	985	1115	1250	1390	1525
	100	745	855	970	1085	1205	1330
	80	635	730	825	920	1025	1130
EXHAUST GAS FLOW (LBS/HR)	173	—	6170	6995	7835	8700	9560
	158	4960	5710	6470	7250	8050	8850
	140	4510	5190	5880	6585	7315	8045
	120	3995	4590	5200	5825	6470	7115
	100	3480	3990	4520	5060	5625	6190
	80	2960	3395	3840	4300	4780	5265
NO_x EMISSION (G/BHP-HR)	173	—	12.6	12.8	13.1	13.3	13.5
	158	12.6	12.9	13.1	13.4	13.6	13.9
	140	12.8	13.1	13.4	13.7	14.0	14.3
	120	13.1	13.4	13.8	14.1	14.4	14.7
	100	13.4	13.7	14.1	14.5	14.8	15.2
	80	13.6	14.0	14.4	14.8	15.2	15.6
CO EMISSION (G/BHP-HR)	173	—	8.1	8.7	8.9	8.8	8.6
	158	7.1	8.0	8.6	8.9	8.8	8.7
	140	7.1	8.0	8.7	9.1	9.0	9.0
	120	7.1	8.1	8.9	9.3	9.4	9.4
	100	7.3	8.4	9.2	9.8	9.9	10.0
	80	7.7	8.8	9.7	10.3	10.5	10.7
NMHC EMISSION (G/BHP-HR)	173	—	0.34	0.31	0.29	0.28	0.28
	158	0.39	0.34	0.30	0.28	0.28	0.27
	140	0.40	0.35	0.31	0.29	0.28	0.28
	120	0.43	0.37	0.34	0.31	0.30	0.30
	100	0.47	0.42	0.38	0.35	0.34	0.33
	80	0.53	0.48	0.44	0.41	0.40	0.39

HEAT REJECTION AND OPERATING DATA — MODEL L5794GSI
130° F AUX. WATER TEMPERATURE
180° F JACKET WATER TEMPERATURE

	BMEP (PSI)	ENGINE SPEED — RPM					
		700	800	900	1000	1100	1200
THC EMISSION (G/BHP-HR)	173	—	2.30	2.06	1.91	1.89	1.87
	158	2.60	2.27	2.03	1.87	1.84	1.81
	140	2.66	2.33	2.07	1.91	1.87	1.83
	120	2.85	2.50	2.24	2.06	2.01	1.97
	100	3.14	2.79	2.52	2.33	2.27	2.22
	80	3.56	3.19	2.91	2.72	2.65	2.58

NOTES:

1. All data are based on ISO standard conditions of 29.54 inches Hg. barometric pressure, 77° F ambient and induction air temperature, 30% relative humidity (0.3 inches Hg. water vapor pressure), 180° F engine jacket water outlet temperature, and standard ignition timing.
2. All data are average values at the standard conditions and will vary for individual engines and with operating and ambient conditions and with changes to ignition timing or air/fuel ratio. An adequate reserve should be used for cooling system or heat recovery calculations. See also Cooling System Guidelines, S-6699-7, latest version.
3. ISO Standard (continuous) power ratings conform to ISO 3046/1, latest version, with a mechanical efficiency of 90% and auxiliary water temperature, Tcra, of 130° F limited to ± 10° F.
1. Fuel standard: dry natural gas, 900 BTU/scf saturated lower heating value (SLHV), with a minimum Waukesha Knock Index™ of 91. Refer to S-7884-7, latest version, for the full fuel specification.
5. 8.25:1 compression ratio.
6. The maximum Series Four® engine jacket water temperature is 180° F.
7. Total Exhaust Energy includes both recoverable and non-recoverable heat. For a procedure to calculate recoverable heat refer to S-8117-2, latest version.
8. Exhaust carbon monoxide (CO) concentration set to 0.38% (with exhaust oxygen concentration of 0.30%) for stoichiometric operation at rated speed and load at standard 24° BTDC ignition timing. This CO level is measured at the port located in the exhaust manifold upstream of the turbocharger.
9. Reference Engine Ratings and Fuel Consumption Curve Sheet C-268-9.
10. Exhaust flow at nominal 29.54 inches Hg. atmospheric pressure:

$$\text{Flow rate: ACFM} = \frac{(\text{Exh. Flow, lb/hr}) \times (\text{Exh. Temp. }^{\circ}\text{F} + 460^{\circ})}{2250}$$

DRESSER Waukesha

HEAT REJECTION AND OPERATING DATA MODEL L5794GSI 130° F AUX. WATER TEMPERATURE 180° F JACKET WATER TEMPERATURE	EN: 124175 DATE: 11/01	Ref. S 6124-70

AT-GL EMISSION LEVELS ‡

MODEL	CARBURETOR SETTING	GRAMS/BHP-HR				% OBSERVED DRY		MASS AFR (2)	VOLUME AFR (2)	EXCESS AIR RATIO
		NOx (1)	CO	NMHC (4)	THC	CO	O_2			
AT25GL	Standard	1.0	2.25	1.0	8.0	0.06	9.8	28.0:1	16.8:1	1.74
AT27GL	Standard	1.5	1.7	0.5	5.0	0.06	9.8	28.0:1	16.8:1	1.74
	Ultra Lean	1.25	1.5	0.4	3.5	0.05	11.2	32.0:1	19.2:1	2.00

‡ The AT-GL emission levels are based on 900 – 1000 rpm operation. For information at all other speeds contact Waukesha's Sales Engineering Department.

VHP EMISSION LEVELS

MODEL	CARBURETOR SETTING	GRAMS/BHP-HR				% OBSERVED DRY		MASS AFR (2)	VOLUME AFR (2)	EXCESS AIR RATIO
		NOx (1)	CO	NMHC (4)	THC	CO	O_2			
G, GSI	Lowest Manifold (Best Power)	8.5	32.0	0.35	2.3	1.15	0.30	15.5:1	9.3:1	0.97
	Equal NOx & CO	12.0	12.0	0.35	2.3	0.45	0.30	15.9:1	9.6:1	0.99
	Catalytic Conv. Input (3-way(3))	13.0	9.0	0.30	2.0	0.38	0.30	15.95:1	9.6:1	0.99
	Standard (Best Economy)	22.0	1.5	0.25	1.5	0.02	1.35	17.0:1	10.2:1	1.06
F3524GSI, L7044GSI	Equal NOx & CO	14.0	14.0	0.25	1.1	0.45	0.30	15.85:1	9.5:1	0.99
	Catalytic Conv. Input (3-way(3))	15.0	13.0	0.20	1.0	0.38	0.30	15.95:1	9.6:1	0.99
	Standard (Best Economy)	23.0	2.0	0.20	0.8	0.02	1.35	17.0:1	10.2:1	1.06
L5794GSI	Equal NOx & CO	13.5	13.5	0.45	3.0	0.45	0.30	15.85:1	9.5:1	0.99
	Catalytic Conv. Input (3-way(3))	14.5	11.0	0.45	2.9	0.38	0.30	15.95:1	9.6:1	0.99
	Standard (Best Economy)	22.0	3.0	0.35	2.4	0.02	1.35	17.0:1	10.2:1	1.06
GL	Standard	1.5	2.65	1.0	5.5	0.06	9.8	28.0:1	16.8:1	1.74
L5774LT#	Standard	2.6	2.0	0.60	4.0	0.04	8.0	24.7:1	14.8:1	1.54
L5794LT#	Standard	2.6	2.0	0.60	4.0	0.04	7.8	24.5:1	14.7:1	1.52

L5774LT and L5794LT emission levels are based on 1000 – 1200 rpm operation. For information at all other speeds contact Waukesha's Sales Engineering Department.

NOTE: The above tables indicate emission levels that are valid for new engines for the duration of the standard warranty period and are attainable by an engine in good operating condition running on commercial quality natural gas of 900 BTU/ft^3 (35.38 MJ/m^3 [25, V(0; 101.325)]) SLHV, Waukesha Knock Index™ of 91 or higher, 93% methane content by volume, and at ISO standard conditions. Emissions are based on standard engine timing at 91 WKI™ with an absolute humidity of 42 grains/lb. Refer to engine specific WKI™ Power & Timing curves for standard timing. Unless otherwise noted these emission levels can be achieved across the continuous duty speed range and from 75% to 110% of the ISO Standard Power (continuous duty) rating. ***Contact your local Waukesha representative or Waukesha's Sales Engineering Department for emission values which can be obtained on a case-by-case basis for specific ratings, fuels, and site conditions.***

FORMALDEHYDE EMISSION LEVELS

The following table provides formaldehyde (CH_2O) levels that are valid for new engines for the duration of the standard warranty period and are attainable by an engine in good operating condition running on commercial quality natural gas of 900 BTU/ft^3 (35.38 MJ/m^3 [25, V(0; 101.325)]) SLHV, Waukesha Knock Index^{TM} of 91 or higher, 93% methane content by volume, and at ISO standard conditions. Values are based on standard engine timing at 91 WKI^{TM} with an absolute humidity of 42 grains/lb. Refer to engine specific WKI^{TM} Power & Timing curves for standard timing. Unless otherwise noted, these emission levels can be achieved across the continuous duty speed range at the load levels tabulated. ***Contact your local Waukesha representative or Waukesha's Sales Engineering Department for emission values which can be obtained on a case-by-case basis for specific ratings, fuels, and site conditions.***

MODEL	CARB. SETTING	CH_2O GRAMS/ BHP-HR		% OBSERVED DRY		MASS AFR[2]	VOLUME AFR[2]	EXCESS AIR RATIO
		PERCENT LOAD		CO	O_2			
		100%	75%					
AT25GL	Lean Burn	0.18	0.20	0.06	9.8	28.0:1	16.8:1	1.74
AT27GL	Lean Burn	0.18	0.20	0.06	9.8	28.0:1	16.8:1	1.74
	Ultra Lean	0.18	0.20	0.05	11.2	32.0:1	19.2:1	2.00
VHP G, GSI	Rich Burn	0.05	0.05	0.02 – 1.15	0.30 – 1.35	15.5:1 – 17.0:1	9.3:1 – 10.2:1	0.97 – 1.06
VHP Series 4 GSI	Rich Burn	0.05	0.05	0.02 – 0.45	0.30 – 1.35	15.85:1 – 17.0:1	9.5:1 – 10.2:1	0.99 – 1.06
L5774LT L5794LT	Lean Burn	0.22	0.25	0.04	7.8 – 8.0	24.5:1 – 24.7:1	14.7:1 – 14.8:1	1.52 – 1.54
VHP GL	Lean Burn	0.29	0.34	0.06	9.8	28.0:1	16.8:1	1.74
VGF G, GSID	Rich Burn	0.05	0.05	0.20 – 1.1	0.18 – 2.4	15.5:1 – 18.0:1	9.3:1 – 10.8:1	0.97 – 1.12
VGF GL, GLD, GLD/2	Lean Burn	0.19	0.22	0.03 – 0.04	7.8 – 9.0	21.5:1 – 25.4:1	13.9:1 – 15.2:1	1.53 – 1.65
VSG G, GSI, GSID	Rich Burn	0.05	0.05	0.02 – 1.15	0.29 – 2.10	15.5:1 – 17.7:1	9.3:1 – 10.6:1	0.97 – 1.10
F1197G	Rich Burn	0.05	0.05	0.04 – 1.35	0.30 – 1.35	15.5:1 – 17.0:1	9.3:1 – 10.2:1	0.97 – 1.06
F817G	Rich Burn	0.05	0.05	0.04 – 1.30	0.30 – 1.35	15.5 :1 – 17.0:1	9.3:1 – 10.2:1	0.97 – 1.06

EXTERRAN™

3/6/2008

For:

Western Gas Resources

Location:

Barker Creek

SJ/NM

Engine:

Wuakesha ~~L7042GL~~ 5794GSI

Unit #

1

S/N

C-14422/1

Test Technician:

Charles Blassingame

Customer: Western Gas Resources
Unit: 1
Engine: Wuakesha L7042GL 5794 GSI
S/N: C-14422/1
Permit # : 0
Analyzer: Ecom AC

Site: Barker Creek
Location: SJ/NM
Compressor: Ariel
S/N: 0
Converter: 0
S/N: 0

Manufactures Rated HP	1318			
Fuel BSFC (btu/hp-hr)	11000	0	0	0

Date	3/6/2008			

Engine Data:				
Engine RPM	1045			
Engine Hours				
Engine Oil Pressure (psi)	47			
Engine Water Temperature (°F)	180			
Engine Manifold Pressure/Vacuum	3psi	0	0	0
Engine Manifold Temperature (°F)	120			
Ignition Timing (°BTDC)	24			
Engine Load %	60%	#VALUE!	#VALUE!	#VALUE!
HP In Use	791			
Fuel Pressure	25			
Fuel Volume (mscf/hr)	8.86			
Exhaust Temperature (°F)				

Compressor Data:				
Compressor Volume (MMCFD)				
Suction Pressure (psia)	35			
Discharge Pressure (psia)	112/360			
First Stage Temperatures (°F)				

Engine Emission Data: Post-Converter Post Converter Catalyst Information				
Temperature (°F)				
Safety Kill (°F)				
Back Pressure ("H_2O)				
CO Information				
Parts Per Million	322.9			
Grams/Bhp/Hr	1.05	#VALUE!	#VALUE!	#VALUE!
Pounds Per Hour	1.83	#VALUE!	#VALUE!	0.00
Tons Per Year	8.02	#VALUE!	#VALUE!	0.00
NOx Information				
Parts Per Million	198.5			
Grams/Bhp/Hr	1.06	#VALUE!	#VALUE!	#VALUE!
Pounds Per Hour	1.85	#VALUE!	#VALUE!	0.00
Tons Per Year	8.10	#VALUE!	#VALUE!	0.00
Oxygen (% O_2)	0.6			0

Post Test Span Values				
CO	947	0	0	0
NO	777	0	0	0
NO_2	70	0	0	0

Engine Emission Data: Pre-Converter Pre Converter Catalyst Information				
Temperature (°F)				
Safety Kill (°F)				
Back Pressure ("H_2O)				
CO Parts Per Million				
NOx Parts Per Million				
Oxygen (% O_2)	0	0	0	0
Catalyst Efficiency (% Reduction CO)	#VALUE!	#VALUE!	#VALUE!	#VALUE!
Catalyst Efficiency (% Reduction NOx)	#VALUE!	#VALUE!	#VALUE!	#VALUE!

Pre Test Span Values				
CO	944	0	0	0
NO	774	0	0	0
NO2	71	0	0	0

Test Results				
Carbon Monoxide gr/hp-hr	PASS	#VALUE!	#VALUE!	#VALUE!
Carbon Monoxide lbs/hr	PASS	#VALUE!	#VALUE!	PASS
Carbon Monoxide tpy	PASS	#VALUE!	#VALUE!	PASS

Oxides of Nitrogen gr/hp-hr	PASS	#VALUE!	#VALUE!	#VALUE!
Oxides of Nitrogen lbs/hr	PASS	#VALUE!	#VALUE!	PASS
Oxides of Nitrogen tpy	PASS	#VALUE!	#VALUE!	PASS

Permit Limits	gr/hp-hr	lbs/hr	tpy
Carbon Monoxide	3	na	na
Oxides of Nitrogen	3	na	na

Low Span Gas	Value/PPM	Certification #	Accuracy % +/-	Expiration Date
CO	944	08-56693	2	39418
NO	773	08-56693	2	39418
NO_2	71.9	08-48864	2	39202
High Span Gas	**Value/PPM**	**Certification #**	**Accuracy % +/-**	**Expiration Date**
CO	12000	08-56693	2	39418
NO	3490	08-56693	2	39418

Emission Technician: Charles Blassingame

PERIODIC MONITORING REPORT

Company:	**Western Gas Resources**	**Facility:**	**BARKER-CREEK**
Source Tested	UNIT-1	**Date:**	03/04/04
Source Manufacturer/Model #:	Waukesha 5794GSI		
Site-rated Horsepower:	1500	Source Serial #:	C-14422/1
Type of Emission Control	Air Fuel / Catalyst		
Analyst:	David Zimbelman	**Analyzer Serial #:**	3E001146
Analyzer Manufacturer/Model#:	ENERAC 3000E		

Source for Horsepower Data:

- [x] Site Rating
- [ ] Calculated from operating parameters
- [ ] Calculated from GPSA Formula

Fuel Consumption:

- [ ] Obtained from individual fuel meter
- [ ] Determined from manufacturer's data
- [x] Determined using default of 9400 btu/hp-hr

Test Summary			
	NOX Tested:	2.87	lbs/hr
	NOX Limit:	NA	lbs/hr
	CO Tested:	4.02	lbs/hr
	CO Limit:	NA	lbs/hr

Western Gas Resource, Inc

F FACTOR CALCULATION SPREADSHEET

From a fuel gas analysis
Enter the mole % of each component of the fuel gas:

	mole %	CARBON	HYDROGEN	OXYGEN	NITROGEN
CO2:	0.492	0.06	0.00	0.16	0.00
Nitrogen:	1.151	0.00	0.00	0.00	0.32
Methane:	93.817	11.27	3.78	0.00	0.00
Ethane:	2.760	0.66	0.17	0.00	0.00
Propane:	0.906	0.33	0.07	0.00	0.00
Iso-Butane:	0.260	0.12	0.03	0.00	0.00
n-Butane:	0.330	0.16	0.03	0.00	0.00
Iso-Pentane:	0.120	0.07	0.01	0.00	0.00
n-Pentane	0.102	0.06	0.01	0.00	0.00
n-Hexane	0.042	0.03	0.01	0.00	0.00
Heptane:	0.020	0.02	0.00	0.00	0.00
Total	100.00	12.78	4.12	0.16	0.32
Percentage		73.54%	23.70%	0.91%	1.86%

Calculated Molecular Weight of Fuel Gas: 17.38 lb/lb-mole

Calculated heating value (Hv) = 1,034.49 Btu / scf

On a mass basis this is: 22,947.74 Btu / lb

Calculated F Factor (Fd) = 8,655.16 dscf / MMBtu

Notes:
The gross calorific value of the fuel gas (Hv) is calculated @ 68 deg. F. and 14.696 psia
Gross heating values are from the GPSA data book (fig. 23-2).
Gross heating values were corrected from 60 to 68 deg. F by multiplying
each heating value by 520 deg. R / 528 deg. R

Calibration Error Check Data Sheet

Company: **Western Gas Resources** Facility: **BARKER-CREEK**
Source Tested: UNIT-1 Date: 03/04/04
Analyst: David Zimbelman Analyzer Serial #: 3E001146
Analyzer Manufacturer/Model #: ENERAC 3000E
Span Gasses: NO= 495.5 NO2= 158 CO= 1528 O2= 20.9

PRETEST CALIBRATION ERROR CHECK								
			A	B	|A-B|	|A-B|/SG*100	Calibration	Response
		Pump Flow Rate (l/m)	Analyzer Reading	Cal Gas Concentration	Absolute Difference	% of Span	Valid (Yes or No)	Time (minutes)
NO	zero	0.7	0	**0**	0	0.00	yes	3
	span	0.7	491	**495.5**	4.5	0.91	yes	3
NO2	zero	0.7	0	**0**	0	0.00	yes	5
	span	0.7	156	**158**	2	1.27	yes	5
CO	zero	0.7	0	**0**	0	0.00	yes	3
	span	0.7	1535	**1528**	7	0.46	yes	3
O2	zero	0.7	0	**0**	0	0.00	yes	1
	span	0.7	20.9	**20.9**	0	0.00	yes	1
		Pretest Calibration NO Cell Temperature (F):						

SG=Span Gas

POST TEST CALIBRATION ERROR CHECK									Interference Check	
			A	B	|A-B|	|A-B|/SG*100	Calibration	Average of	NO	CO
		Pump Flow Rate (l/m)	Analyzer Reading	Cal Gas Concentration	Absolute Difference	% of Span	Valid (Yes or No)	Pre &Post Readings (ppm)	Monitor Response (ppm)	Monitor Response (ppm)
NO	zero	0.7	0	**0**	0.00	0.00	yes	0		
	span	0.7	489	**495.5**	6.50	1.31	yes	490		0
NO2	zero	0.7	0	**0**	0.00	0.00	yes	0		
	span	0.7	153	**158**	5.00	3.16	yes	154.5	0	0
CO	zero	0.7	0	**0**	0.00	0.00	yes	0		
	span	0.7	1540	**1528**	12.00	0.79	yes	1537.5		
O2	zero	0.7	0	**0**	0.00	0.00	yes	0		
	span	0.7	20.9	**20.9**	0.00	0.00	yes	20.9		
		Post Test Calibration NO Cell Temperature (F): NA								
		CO Interference Response (Ico,%): **0.00**			NO Interference Response (Ino,%): **0.00**					

SG=Span Gas

Form D-1
Reciprocation Engine Test Results

Company:	Western Gas Resources	Facility:	BARKER-CREEK
Source Tested	UNIT-1	Date:	03/04/04
Source Manufacturer/Model #:	Waukesha 5794GSI		

Site-rated Horsepower:	1500	Source Serial #:	C-14422/1
Type of Emission Control	Air Fuel / Catalyst		

Analyst:	David Zimbelman	Analyzer Serial #:	3E001146
Analyzer Manufacturer/Model#:	ENERAC 3000E		

Operating Conditions

Source operating at 90 percent or greater site-rated horsepower during testing? yes no

Suction/ Discharge Pressures	Engine RPM	Engine Gas throughput	Engine Fuel Consumption	Fuel Heat Content Btu/cf	Engine Specific Fuel Consumption (Btu/hp-hr) *	Engine Tested Horsepower
28/275	930			1,034.49	9,400	1500

* As reported by the Manufacturer

Test Results

Test Start Time: 11:38 AM NO Cell Temperature (F) after 1/3 of the test:

Test End Time: 12:53 PM NO Cell Temperature (F) after 2/3 of the test:

NOx (NO + NO2)								
Average Tested NO ppm	NOcorrected ppm	Average Tested NO2 ppm	NO2corrected ppm	NOXcorrected ppm	NOX Tested gm/hp-hr	NOX Tested lb/hr	NOX Allowable gm/hp-hr	NOX Allowable lb/hr
196.26	197.45	0.00	0.00	197.45	0.87	2.87	NA	NA

O2							
Avg. Tested O2 %	O2 corrected %	Avg. Tested CO ppm	CO corrected ppm	CO Tested gm/hp-hr	CO Tested lb/hr	CO Allowable gm/hp-hr	CO Allowable lb/hr
0.00	0.00	455.66	452.83	1.22	4.02	NA	NA

I certify to the best of my knowledge the tests results are accurate and representative of the emissions from this source.

David Zimbelman
Print Name

Signature