

Attachment #1
AIR PERMIT
FOLDER LEVEL

AIR PA #: 102754579 051633

File Type: PERMITS

Volume: 001

Inclusive Dates: 1/1/2002 - 12/31/2004

Media Code/ Form

- ☐ Microfiche
- ☒ Roll Microfilm
- ☒ Electronic Image

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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

July 24, 2002

Ms. Irene T. Garcia
Senior Staff Engineer
Exxon Mobil Corporation
P.O. Box 4358
Houston, Texas 77210-4358

Re: Permit By Rule Registration Number: 51633
Borregos ME-54 Remote Site
Kingsville, Kleberg County

Dear Ms. Garcia:

This is in response to your Form PI-7 entitled "Permit By Rule Registration" concerning the proposed installation and operational use of two dehydrator systems at the Borregos ME-54 Remote Site, located near Kingsville, in Kleberg County. We understand that the dehydrator systems are equipped with BTEX condensers in order to control Hazardous Air Pollutants (HAP) and volatile organic compounds (VOC) emissions. Total emissions associated with the referenced activities are estimated to be 0.6 ton per year (tpy) of VOCs and 0.3 tpy of benzene.

After evaluation of the information which you have furnished, we have determined that your installation is authorized under Title 30 Texas Administrative Code § 106.352 (30 TAC § 106.352) if constructed and operated as described in your registration request. This permit by rule was authorized by the Texas Natural Resource Conservation Commission (TNRCC) pursuant to 30 TAC Chapter 106.

A copy of the permit by rule in effect at the time of this registration is enclosed. You must construct, install, or modify facilities in accordance with the version of the permit by rule in effect when construction, installation, or modification actually begins [see 30 TAC § 106.4(a)(5)]. After completion of construction, installation, or modification, the facility shall be operated in compliance with all the applicable conditions of the claimed permit by rule and 30 TAC § 106.4.

Ms. Irene T. Garcia

Page 2

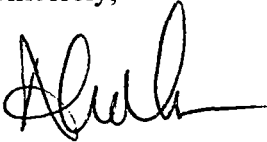
July 24, 2002

Re: Permit By Rule Registration Number: 51633

You are reminded that regardless whether a permit is required, this facility must be in compliance with all rules and regulations of the TNRCC and the U.S. Environmental Protection Agency at all times. Please note that 40 CFR 63, Subpart HH, National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities is now in effect. It is the responsibility of the owner/operator to ensure that applicability of 40 CFR 63 is properly determined, both initially and whenever changes are made at a unit. The owner/operator may choose to complete and retain a PI-8 certification under 30 TAC 106.6 demonstrating that the emissions levels at the unit are below applicability limits for 40 CFR 63, Subpart HH.

Your cooperation in this matter is appreciated. If you have any questions concerning this permit by rule, please contact Mr. Miguel Galvan at (361) 825-3420 or write him at the Texas Natural Resource Conservation Commission, Office of Permitting, Remediation, and Registration, Air Permits Division (MC-161), P.O. Box 13087, Austin, Texas 78711-3087.

Sincerely,



Anne M. Inman, Manager
Permit By Rule/General Operating Permits Section
Air Permits Division
Texas Natural Resource Conservation Commission

AMI/MOG/mfs

Enclosure

cc: Mr. Jim Bowman, Air Program Manager, Region 14 - Corpus Christi

Record Number. 89794

AIR PERMIT BY RULE TECHNICAL REVIEW

Registration #	51633	Project #	89794	Date Received	06/20/2002
Account ID #		Reg Entity #	RN102754579	PBR(s) Claimed	106.352
Company	Exxon Mobil Corporation	Facility Name	Borregos ME-54 Remote Site	Assoc Permit #s	
Primary Contact	Ms. Irene T. Garcia	Phone #	(713)431-1221	Fax #	(713)431-4358
Contact Name		Phone #		Fax #	

General Rules Check:

	<u>Yes</u>	<u>No</u>	<u>Describe which/how requirements are met if needed</u>
Is each PBR \leq 25/250 tpy?	x		
Are PBR sitewide emissions $>$ 25/250 tpy? (PN)		x	
Are there permit limits on using PBRs at site?		x	
Is PSD/Nonattainment netting required?		x	
Is FCAA §112g review required? (10/25 tpy)		x	
Do NSPS/NESHAPS/MACT Standards apply?		x	
Does NOx Cap and Trade apply to this PBR?		x	
Is the facility in compliance with all other applicable rules and regulations?	x		
Is this facility located at a Title V major site?		x	

Overall Site / Unit Description:

This claim is for the proposed installation and operational use of two dehydrator systems at the Borregos ME-54 Remote Site, located near Kingsville, in Kleberg County.

Project Sources / Facilities, PBRs Claimed, Applicable Standards, Emissions and Control Summary:

The Borregos ME-54 Remote Site reviews raw field gas from producing wells. The gas from the high pressure wells flow through a 3-phase separator. The gas splits and flows to the dehydrator contactor towers. Dry gas is then sent to east lateral. Liquids are separated and sent through a 6" pipeline to tank battery No. 10. The company is in compliance with 106.4.

106.352 Oil and Gas production Facilities

- 1) There are no compressors or flares.
- 2) Total emissions, including process fugitives, combustion unit stacks, separator, or other process vents, tank vents, and loading emissions from all such facilities constructed at a site under this section shall not exceed 25 tons per year (tpy) each of sulfur dioxide (SO₂), all other sulfur compounds combined, or all volatile organic compounds (VOC) combined; and 250 tpy each of nitrogen oxide and carbon monoxide. Emissions of VOC and sulfur compounds other than SO₂ must include gas lost by equilibrium flash as well as gas lost by conventional evaporation.
- 3) Any facility handling sour gas shall be located at least 1/4 mile from any recreational area or residence or other structure not occupied or used solely by the owner or operator of the facility or the owner of the property upon which the facility is located. The facility handles sweet natural gas.
- 4) The facility handles sweet natural gas.
- 5) PI-7 included.

Estimated Annual Emissions (Tons/year) - Proposed modifications to the Borregos ME-54 Remote Site.

EPN	Emission Source	Benzene	VOC
EXHSTK1	Dehydrator Still Vent	0.1505	0.3045
EXHSTK2	Dehydrator Still Vent	0.1505	0.3045
Total Emissions:		0.301	0.609

Distance Limitations (if applicable):

Site Review/Distance Limits	Yes	No	Description/Outcome	Date	Reviewed by
Site Review Required?		x			
PBR Distance Limits Met?	x				

Compliance History:

	<u>Yes</u>	<u>No</u>	<u>Description / Groupwise Document #</u>
Does this registration require a 30 TAC 60 Compliance History review?		x	
Description of findings of CH review:		N/A	
Should the PBR claim be denied on the basis of CH?		x	

Review Summary:

	<u>Yes</u>	<u>No</u>	<u>If no, describe</u>
Are all general and specific applicable rule conditions satisfied?	x		
Accept Claim for Registration?	x		

Technical Reviewer


Name/Signature: Miguel Galvan

Date: July 18, 2002

Team Leader/Back up

Clyde Price

July 22, 2002

Section Manager/Back Up
7/24/02

10/24/2002 ----- NSR PERMITS IMS- PROJECT RECORD -----

PROJECT#: 89794 PERMIT#: 51633 STATUS: X DISP CODE: _____
RECEIVED: 06/20/2002 PROJTYPE: XRVW ISSUED DATE:
07/24/2002
FEE DATE: FEE AMT: \$ 0 STDY1/SP: 352 SUP-DISP DATE: 07/24/2002
GROUP: PAR
PARSTAFF1: ROMERO, RONICA &
PARSTAFF2: NELON, DONALD
GROUP: CCRT
TECHENGR : GALVAN, MIGUEL
ADMIN REVIEW

A - PAR RECEIVED : 06/20/2002 A - ACCT#/CR# REC 07/15/2002 A - PAR TRANSFER TO 07/16/2002
FROM REGION : APD :

ISSUED TO: EXXON MOBIL
CORPORATION

CUSTOMER REGISTRY ID: CN600123939

PRIMARY CONTACT INFORMATION

CONTACT TYPE: RESPONSIBLE OFFICIAL

NAME: MS IRENE T GARCIA

TITLE: SENIOR STAFF ENGINEER

PHONE: 713-431-1221 ext

FAX: 713-431-1450 ext

STREET: PO BOX 4358

CITY/STATE, ZIP: HOUSTON, TX , 77210-4358

PROJECT INFORMATION

UNIT: BORREGOS ME-54 REMOTE SITE

SIC: 1311 REGION: 14 ACCOUNT:

REG ENTITY ID:
RN102754579

SITE NAME: ME-54 REMOTE STATION

COUNTY: KLEBERG

CAPUNITS:

UNITTYPE:

CAPACITY:

CITY: KINGSVILLE

LOCATION: FROM THE INTERSECTION OF HWY 77 AND
HWY 141, TVL 10 MI WEST ON HWY 141, TURN LEFT AT
A CAUTION LIGHT, GO SOUTH ON PAVED RD TO FIELD
OFFICE

PUBLIC NOTICE

PUBLIC NOTICE REQUIRED?: PN1 ALT LANGUAGE: NO PN2 ALT LANGUAGE: NO

**EMISSION
RATES**

TONS/YR REDUCTION	NOX	CO	VOC	PM	SO2	OTHER	TOTAL
-------------------	-----	----	-----	----	-----	-------	-------

PROJECT NOTES

TECHNICAL ACTIVITY HISTORY

TR - ENGINEER 07/18/2002 SUP - RECEIVED FROM 07/18/2002 TR - SUP/MANGR 07/18/2002
RECEIVE PROJECT : PAR : APP/RVW RQSTD :

PBR - TO AUSTIN : 07/22/2002 FA - PROJECT ISSUED : 07/24/2002

PROJECT ATTRIBUTES

PROJECT LINK

PROJECTS/PERMITS VOIDANCE

Jul 1 2002 10:21 P.01



TNRCC

Protecting Texas
by Reducing and
Preventing Pollution

FAX TRANSMITTAL

DATE: 7/14/02 NUMBER OF PAGES (including this cover sheet): 3

TO: Name Patti Peterson Dana
Organization _____
FAX Number 239-3755

FROM: TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
Name DON Nelson
Division/Region Air and Waste Applications Team,
Permits Administrative Review Section,
Registration, Review, & Reporting Division
Telephone Number 512/239- 0894
FAX Number 512 239-4500

Re: Request for Assistance with Regulated Entity and Customer
Number (replacing NSR Air Account Number)

Company Name: Exxon Mobil Corporation

IMS Project Number: 89794

Proposed NSR Air Permit/Registration Number: 51633

We reviewed the Core Data form for completeness and need the following as checked below:

- ☒ Assign New Regulated Entity and Customer Numbers.
☐ Change Customer Name as on Core Data Form.
☐ Change Regulated Entity Name as on Core Data Form.
☐ Change Address identified with an asterisk on Core Data Form.
☐ Account Number found in Program data base but not in CR so RN needs assigned.
☐ Other, _____

Please write in the numbers on this document below or indicate that changes have been made as requested and fax it back to the sender. The information is needed to complete the administrative review process:

Regulated Entity Number: RN102754579

Customer Number: CN 600123947

Air Account Number, If found: _____

☐ Changes in CR have been made as you noted.

Please call me if you should have any questions.
Thank you

** Transmit Conf. Report **

P.1

Jul 14 2002 10:20

Fax/Phone Number	Mode	Start	Time	Page	Result	Note
3755	NORMAL	14,10:20	1'08"	3	* O K	


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FAX TRANSMITTAL

 DATE: 7/14/02 NUMBER OF PAGES (including this cover sheet): 3

TO:

Name

Patti PetersonDana

Organization

FAX Number

239-3755

FROM:

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Name

DON Nelson

Division/Region

Air and Waste Applications Team,
Permits Administrative Review Section,
Registration, Review, & Reporting Division

Telephone Number

512/239- 0894

FAX Number

512 239-4500
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☐ Other, _____



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Preventing Pollution

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TO: Name Patti Peterson Dana
Organization _____
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Name Don Nelson
Division/Region Air and Waste Applications Team,
Permits Administrative Review Section,
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☐ Other, _____

Please write in the numbers on this document below or indicate that changes have been made as requested and fax it back to the sender. The information is needed to complete the administrative review process:

Regulated Entity Number: _____

Customer Number: CN 600123947

Air Account Number, If found: _____

☐ Changes in CR have been made as you noted.

Please call me if you should have any questions.
Thank you

ExxonMobil Production Company
U.S. West
P.O. Box 4358
Houston, Texas 77210-4358

ExxonMobil
Production

June 14, 2002

PI-8 Registration Request
ME-54 Remote Station
Kleberg County, Texas

Texas Natural Resources Conservation Commission
Permits Administrative Review Section
Registration, Review and Reporting Division, MC 161
12100 Park 35 Circle
Building F, First Floor, Room 1206
Austin, Texas 78753

Dear Sir or Madam:

Exxon Mobil Corporation respectfully requests registration of two dehydrator systems at the Borregos ME-54 Remote Station under Permit By Rule 106.352 (FIN: REB-1, FIN: REB-2). The dehydrator systems are equipped with BTEX condensers in order to control Hazardous Air Pollutants (HAPS) and the Volatile Organic Compound (VOC) emissions. The dehydrators are therefore controlled in accordance with E&P MACT.

Attached for your review is the PI-8 form, the Core Data form, along with supporting documentation that all requirements are being met.

Please Contact Jennifer Wilder at (713) 431-1060 with any questions concerning this registration request.

Yours Truly,



Irene T. Garcia
Senior Staff Engineer

ITG/JCW:mb
Attachments

C – w/attachments

Region 14 – TNRCC
1804 West Jefferson Ave.
Harlingen, TX 78550-5247
956-425-6010

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Air & Waste Applications Team

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Table of Contents
PI-8
Exxon Mobil Corporation
ME-54 Remote – Kleberg County, Texas

- FORM PI-8 & Core Data Form
- Process Description & Flow Diagram
- Emission Summary & Calculations
- Area Map & Plot Plan

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Form PI-8 & Core Data Form

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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

FORM PI-8

SPECIAL CERTIFICATION FORM FOR EXEMPTIONS (Title 30 Texas Administrative Code Chapter 106 [30 TAC Chapter 106]) AND STANDARD PERMITS (30 TAC Chapter 116)

Note: This form should be used to establish enforceable allowable emission rates which are below those allowed by 30 TAC Chapter 106 or 30 TAC § 116.610. Please mail to: Texas Natural Resource Conservation Commission, Office of Permitting, Remediation, and Registration, Air Permits Division, MC-162, P.O. Box 13087, Austin, Texas 78711-3087.

I. APPLICANT INFORMATIONCompany Name: Exxon Mobil Corporation*[Corporation, Company, Government Agency, Firm, etc.]*Mailing Address: P.O. Box 4358, Houston, TX 77210-4358Individual Authorized to Act for Applicant: Name: Irene T Garcia Title: Senior Staff EngineerAddress: Same as above Telephone: (713) 431-1221 Fax: (713) 431-1450Does this action result in the registration of any grandfathered facilities? ☐ YES ☒ NO**II. LOCATION OF FACILITY (LATITUDE AND LONGITUDE MUST BE TO THE NEAREST SECOND)**Name of Plant or Site: Borregos ME-54 Remote SiteName of Facility: ME-54 RemoteStreet Address: N/ANearest City: Kingsville Zip Code: 78364 County: KlebergLatitude: 27 25' 50" Longitude: 97 57' 35"

Does the company (including subsidiaries and parent companies) employ 100 or fewer persons?

☐ YES ☒ NO

Site Requirements:

Submit a plot plan to scale of the property showing the location of plant boundaries, plant equipment, the exempted facility, and the surrounding areas.

III. TYPE OF FACILITY

A. Exemption or Standard Permit Section Number(s):

106.352TNRCC Account Identification Number: N/AB. Associated or Previous Special Exemption or Permit Number (s): 106.352C. Operating Schedule: Hours/Day: 24 Days/Week: 7 Weeks/Year: 52☒ Continuous or _____ Hours/YearD. Start of Construction (Date): n/a Start of Operation (Date): n/aE. ☐ New Source ☐ Modification of Existing Source ☒ Certification of Existing Source**IV. PROCESS DESCRIPTION**

Submit a summary which describes the construction, process, operation, and compliance of the facility. The description must be in sufficient detail to indicate how the facility conforms to the specified exemption or standard permit and verifies the maximum emission rates indicated below.

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V. MAXIMUM EMISSIONS RATE DATA

Submit documentation which demonstrates the basis for each emission point number's maximum emission rates represented below, including fugitives (calculations, emission factors, equipment capacity, sampling, monitoring, etc.)

Emission Point Number	Name of Source	Name of Air Contaminant	Emission Rate of Each Air Contaminant			
			Maximum Pound/Hour		Actual Tons/Year	
			Gaseous	Particulate	Gaseous	Particulate
EXHSTK1	Dehy still vent	VOC	0.0695		0.3045	
EXHSTK2	Dehy still vent	VOC	0.0695		0.3045	

Any additional data required should be shown on an attached sheet.

VI. COPY DISTRIBUTION

Was a copy of this certification sent to the Air Permits Division of the TNRCC?

☒ YES ☐ NO ☐ NA

Date: _____

Was a copy of this certification sent to the Regional Office of the TNRCC?

☒ YES ☐ NO ☐ NA

Date: _____

VII. SIGNATURE

I, Rudy Hanselka Operations Superintendent
(Name) (Title)

state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I also certify that the maximum emission rates listed on this certification reflect the maximum anticipated emissions due to the operation of this facility. To the best of my knowledge and belief, the project will satisfy the conditions and limitations of the indicated exemption or standard permit. The facility will operate in compliance with all regulations of the Texas Natural Resource Conservation Commission and with federal U.S. Environmental Protection Agency regulations governing air pollution.

DATE: 6/14/02 SIGNATURE: RH

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TNRCC Core Data Form

TNRCC Use Only

SECTION I: General Information

1. Reason for Submission <i>Example: new wastewater permit; IHW registration; change in customer information; etc.</i>	
NSR	
2. Attachments <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Describe Any Attachments: (ex: Title V Application, Waste Transporter Application, etc.) PI-8
3. Customer Reference Number-if issued CN N/A (9 digits)	4. Regulated Entity Reference Number-if issued RN N/A (9 digits)

SECTION II: Customer Information

5. Customer Role (Proposed or Actual) – As It Relates to the Regulated Entity Listed on This Form			
Please check <u>one</u> of the following: <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Operator <input type="checkbox"/> Owner and Operator <input type="checkbox"/> Occupational Licensee <input type="checkbox"/> Volunteer Cleanup Applicant <input type="checkbox"/> Other _____			
TNRCC Use Only <input type="checkbox"/> Superfund <input type="checkbox"/> PST <input type="checkbox"/> Respondent			
6. General Customer Information <input checked="" type="checkbox"/> New Customer <input type="checkbox"/> Change to Customer Information <input type="checkbox"/> Change in Regulated Entity Ownership <input type="checkbox"/> No Change* *If "No Change" and Section I is complete, skip to Section III - Regulated Entity Information.			
7. Type of Customer: <input type="checkbox"/> Individual <input type="checkbox"/> Sole Proprietorship - D.B.A. <input type="checkbox"/> Partnership <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Federal Government <input type="checkbox"/> State Government <input type="checkbox"/> County Government <input type="checkbox"/> City Government <input type="checkbox"/> Other Government _____ <input type="checkbox"/> Other _____			
8. Customer Name (If an individual, please print last name first) Exxon Mobil Corporation			
9. Mailing Address: _____ P.O. Box 4358 City Houston State TX ZIP 77210 ZIP + 4 77210-4530			
10. Country Mailing Information if outside USA N/A		11. E-Mail Address if applicable N/A	
12. Telephone Number (713) 431-1219		13. Extension or Code N/A	
14. Fax Number if applicable (713) 431-1450		15. Federal Tax ID (9 digits) 135409005	
16. State Franchise Tax ID Number if applicable 11354090059		17. DUNS Number if applicable (9 digits) N/A	
18. Number of Employees <input type="checkbox"/> 0-20 <input type="checkbox"/> 21-100 <input type="checkbox"/> 101-250 <input type="checkbox"/> 251-500 <input checked="" type="checkbox"/> 501 and higher		19. Independently Owned and Operated? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

SECTION III: Regulated Entity Information

20. General Regulated Entity Information <input checked="" type="checkbox"/> New Regulated Entity <input type="checkbox"/> Change to Regulated Entity Information <input type="checkbox"/> No Change* *If "No Change" and Section I is complete, skip to Section IV - Preparer Information.	
21. Regulated Entity Name (If an individual, please print last name first) ME-54 Remote Station	

Move cursor to page 2 to continue.

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22. Street Address: _____			
(No P.O. Boxes) _____			
City	State	ZIP	ZIP + 4
23. Mailing Address <u>Borregos Work Area</u>			
Address <u>P.O Box 372</u>			
City	State	ZIP	ZIP + 4
Kingsville	TX	78364	
24. E-Mail Address: N/A			
25. Telephone Number		26. Extension or Code	27. Fax Number if applicable
(361) 592-9813			()
28. Primary SIC Code (4 digits) 1311	29. Secondary SIC Code (4 digits) N/A	30. Primary NAICS Code (5 or 6 digits) 211111	31. Secondary NAICS Code (5 or 6 digits) N/A
32. What is the Primary Business of this entity? (Please do not repeat the SIC or NAICS description.) Oil & Gas Production			
<i>Questions 33 - 37 address geographic location. Please refer to the instructions for applicability.</i>			
33. County: Kleberg			
34. Description of Physical Location 10 miles west of Hwy 141, turn left at a caution light. Continue south on paved road to field office. 10 miles south of the office on a lease road is the remote station.			
35. Nearest City Kingsville		State TX	Nearest ZIP 78364
36. Latitude (N)		37. Longitude (W)	
Degrees	Minutes	Degrees	Minutes
27	25	97	57
Seconds		Seconds	
50		35	
38. TNRCC Programs in Which This Regulated Entity Participates <i>Not all programs have been listed. Please add to this list as needed. If you don't know or are unsure, please mark "unknown."</i>			
<input type="checkbox"/> Animal Feeding Operation	<input type="checkbox"/> Petroleum Storage Tank	<input type="checkbox"/> Water Rights	
<input type="checkbox"/> Title V - Air	<input type="checkbox"/> Wastewater Permit	<input checked="" type="checkbox"/> Natural Minor	
<input type="checkbox"/> Industrial & Hazardous Waste	<input type="checkbox"/> Water Districts	<input type="checkbox"/>	
<input type="checkbox"/> Municipal Solid Waste	<input type="checkbox"/> Water Utilities	<input type="checkbox"/> Unknown	
<input checked="" type="checkbox"/> New Source Review - Air	<input type="checkbox"/> Licensing - TYPE(s) _____		

SECTION IV: Preparer Information

39. Name Jennifer C Wilder		40. Title Compliance Engineer
41. Telephone Number (713) 431-1060	42. Extension or Code	43. Fax Number if applicable (713) 431-1450
44. E-Mail Address: <u>jennifer.wilder@exxonmobil.com</u>		

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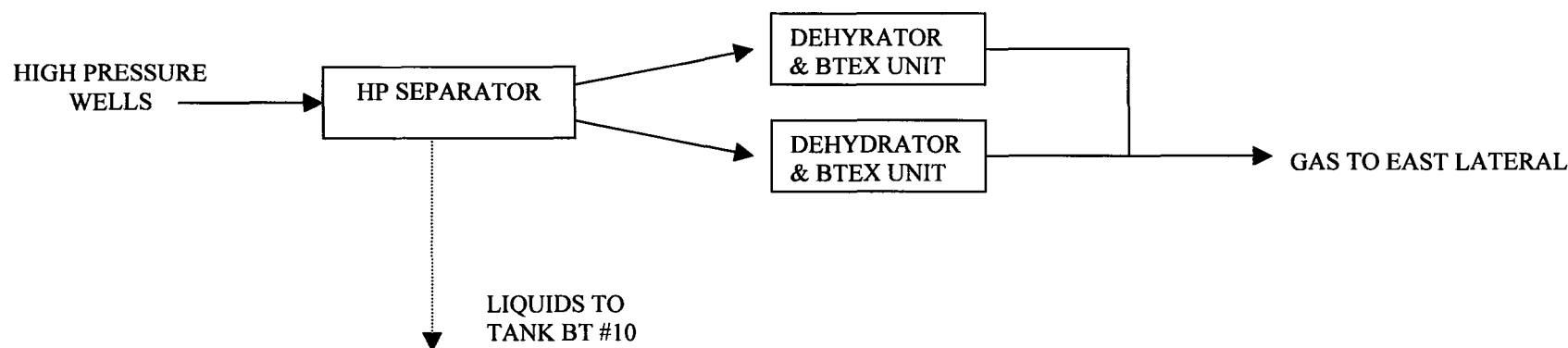
Process Description & Flow Diagram

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BORREGOS ME-54 REMOTE- Block Flow Diagram



Borregos ME-54 Remote Process Description

The remote station reviews raw field gas from producing wells.

The gas from the high pressure wells flow through a 3-phase separator. The gas splits and flows to the dehydrator contactor towers. Dry gas is then sent to east lateral.

Liquids are separated and sent through a 6" line to tank battery No. 10.

Emission Summary & Calculations

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ME-54 Remote Station

Emission Values for dehy with BTEX units

FIN: REB1 EPN: EXHSTK1

Controlled

	lbs/hr	TPY
VOCs	0.0695	0.3045
Benzene	0.0344	0.1505

FIN: REB2 EPN: EXHSTK2

Controlled

	lbs/hr	TPY
VOCs	0.0695	0.3045
Benzene	0.0344	0.1505

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GRI-GLYCalc VERSION 4.0 - EMISSIONS SUMMARY

Case Name: ME-54 Borregos

File Name: H:\Griglyca.4\ME-54.ddf

Date: June 13, 2002

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CONTROLLED REGENERATOR EMISSIONS

Component	lbs/hr	lbs/day	tons/yr
Methane	0.0138	0.330	0.0602
Ethane	0.0060	0.144	0.0263
Propane	0.0006	0.014	0.0026
Isobutane	0.0023	0.055	0.0100
n-Butane	0.0036	0.086	0.0156
Isopentane	0.0015	0.035	0.0065
n-Pentane	0.0016	0.037	0.0068
n-Hexane	0.0019	0.044	0.0081
Cyclohexane	0.0081	0.195	0.0355
Other Hexanes	0.0012	0.029	0.0054
Heptanes	0.0018	0.043	0.0078
Methylcyclohexane	0.0035	0.084	0.0153
Benzene	0.0344	0.825	0.1505
Toluene	0.0081	0.195	0.0355
C8+ Heavies	0.0011	0.026	0.0048
Total Emissions	0.0893	2.143	0.3910
Total Hydrocarbon Emissions	0.0893	2.143	0.3910
Total VOC Emissions	0.0695	1.669	0.3045
Total HAP Emissions	0.0443	1.064	0.1942
Total BTEX Emissions	0.0425	1.019	0.1861

UNCONTROLLED REGENERATOR EMISSIONS

Component	lbs/hr	lbs/day	tons/yr
Methane	0.6904	16.569	3.0239
Ethane	0.3065	7.356	1.3424
Propane	0.0327	0.785	0.1433
Isobutane	0.1322	3.172	0.5788
n-Butane	0.2167	5.201	0.9492
Isopentane	0.1074	2.576	0.4702
n-Pentane	0.1189	2.854	0.5209
n-Hexane	0.2000	4.801	0.8762
Cyclohexane	1.1037	26.489	4.8342
Other Hexanes	0.1197	2.874	0.5245

Heptanes	0.3398	8.156	1.4884
Methylcyclohexane	0.6973	16.736	3.0543
Benzene	4.4487	106.769	19.4853
Toluene	2.2346	53.629	9.7874
C8+ Heavies	24.2591	582.219	106.2549

Total Emissions	35.0077	840.186	153.3339

Total Hydrocarbon Emissions	35.0077	840.186	153.3339
Total VOC Emissions	34.0109	816.261	148.9676
Total HAP Emissions	6.8833	165.199	30.1488
Total BTEX Emissions	6.6833	160.398	29.2727

FLASH GAS EMISSIONS

Component	lbs/hr	lbs/day	tons/yr

Methane	0.0852	2.044	0.3731
Ethane	0.0101	0.243	0.0444
Propane	0.0004	0.011	0.0020
Isobutane	0.0011	0.027	0.0050
n-Butane	0.0014	0.033	0.0060
Isopentane	0.0006	0.014	0.0025
n-Pentane	0.0005	0.012	0.0022
n-Hexane	0.0004	0.010	0.0019
Cyclohexane	0.0006	0.015	0.0028
Other Hexanes	0.0004	0.008	0.0015
Heptanes	0.0003	0.008	0.0015
Methylcyclohexane	0.0003	0.007	0.0013
Benzene	0.0003	0.007	0.0013
Toluene	0.0001	0.002	0.0004
C8+ Heavies	0.0024	0.058	0.0106

Total Emissions	0.1042	2.502	0.4566

Total Hydrocarbon Emissions	0.1042	2.502	0.4566
Total VOC Emissions	0.0089	0.214	0.0391
Total HAP Emissions	0.0008	0.020	0.0036
Total BTEX Emissions	0.0004	0.010	0.0017

FLASH TANK OFF GAS

Component	lbs/hr	lbs/day	tons/yr

Methane	4.2590	102.217	18.6545
Ethane	0.5070	12.169	2.2208
Propane	0.0224	0.537	0.0980
Isobutane	0.0571	1.370	0.2499
n-Butane	0.0690	1.655	0.3021

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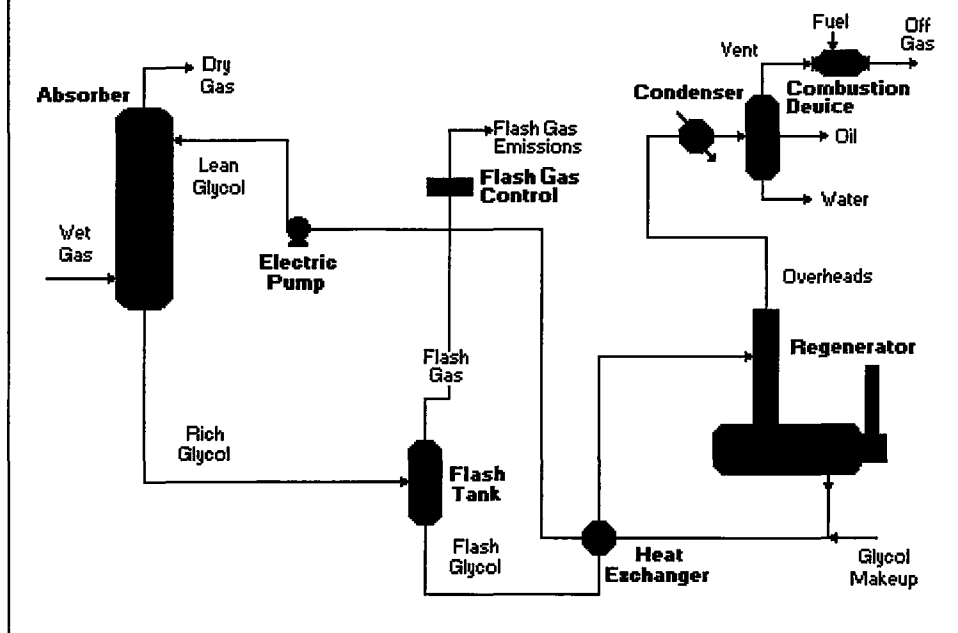
Isopentane	0.0286	0.686	0.1252
n-Pentane	0.0248	0.594	0.1085
n-Hexane	0.0218	0.523	0.0954
Cyclohexane	0.0315	0.755	0.1378
Other Hexanes	0.0176	0.422	0.0770
Heptanes	0.0173	0.414	0.0756
Methylcyclohexane	0.0149	0.358	0.0653
Benzene	0.0152	0.365	0.0667
Toluene	0.0046	0.111	0.0202
C8+ Heavies	0.1212	2.909	0.5309
-----	-----	-----	-----
Total Emissions	5.2118	125.084	22.8278
Total Hydrocarbon Emissions	5.2118	125.084	22.8278
Total VOC Emissions	0.4458	10.699	1.9525
Total HAP Emissions	0.0416	0.999	0.1823
Total BTEX Emissions	0.0198	0.476	0.0869

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TEG Dehydration Flowsheet



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GRI-GLYCalc VERSION 4.0 - SUMMARY OF INPUT VALUES

Case Name: ME-54 Borregos
File Name: H:\Griglyca.4\ME-54.ddf

Date: June 13, 2002

DESCRIPTION:

Description:

Annual Hours of Operation: 8760.0 hours/yr

WET GAS:

Temperature: 101.00 deg. F
Pressure: 975.70 psig
Wet Gas Water Content: Saturated

Component	Conc. (vol %)
Carbon Dioxide	2.0820
Nitrogen	0.0510
Methane	93.4060
Ethane	2.7670
Propane	0.0817
Isobutane	0.1600
n-Butane	0.1860
Isopentane	0.0740
n-Pentane	0.0610
n-Hexane	0.0500
Cyclohexane	0.0600
Other Hexanes	0.0400
Heptanes	0.0400
Methylcyclohexane	0.0310
Benzene	0.0300
Toluene	0.0090
C8+ Heavies	0.5000

DRY GAS:

Flow Rate: 25.0 MMSCF/day
Water Content: 7.0 lbs. H2O/MMSCF

LEAN GLYCOL:

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Glycol Type: TEG
Water Content: 1.5 wt% H2O
Recirculation Ratio: 2.9 gal/lb H2O

PUMP:

Glycol Pump Type: Electric/Pneumatic

FLASH TANK:

Flash Control: Combustion device
Flash Control Efficiency: 98.00 %
Temperature: 100.0 deg. F
Pressure: 125.0 psig

REGENERATOR OVERHEADS CONTROL DEVICE:

Control Device: Condenser
Temperature: 150.0 deg. F
Pressure: 14.7 psia

Control Device: Combustion Device
Destruction Efficiency: 98.0 %
Excess Oxygen: 0.0 %
Ambient Air Temperature: 100.0 deg. F

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Company Name: Exxon Mobil Corporation Checklist completed by: J. Wilder Date: 6/13/02
Facility Type: ME-54 Remote station Exemption(s) claimed: §106.352
Project Description: Register two dehydrator systems

(including equipment, materials, and brief process description)

List the maximum annual emission rates, in TONS PER YEAR (TPY), for this project:

CO : _____ NO_x: _____ PM : _____
SO₂: _____ VOCs: 0.609 Other: _____

The following questions require a "Yes" or "No" answer to be indicated for this exemption claim:

A. §106.4(a)(5): Current Exemption Requirements

Yes X No _____ Have you checked to determine if this exempt project is being claimed under the current version of TAC 106?

If "Yes", continue to next question

If "No", please contact the TNRCC NSRP Division for a copy of the current exemption to be claimed.

B. §106.4(a)(7): Exemption prohibition check

Yes _____ No X Are there any air permits under the same account containing permit conditions which prohibit or restrict the use of standard exemptions?

If "No", continue to next question

If "Yes", exemptions may not be used or their use must meet the restrictions of the permit.

A new permit or permit amendment may be required. List permit number(s): _____

C. §106.4(b): Circumvention check

§106.4(b) states "No person shall circumvent by artificial limitations the requirements of §116.110 of this title (covering permitting)." Circumvention by artificial limitations may include but is not limited to:

1. dividing a complete project into separate segments to circumvent §106.4(a)(1) limits;
2. claiming feed or production rates below the physical capacity of the project's equipment in order to begin constructing facilities before a permit or permit amendment is approved for full scale operations, particularly when the unit will not be economically viable at less than permitted capacity;
3. claiming a limited chemical list in order to begin constructing facilities before a permit or permit amendment is approved for additional chemicals, particularly when the unit will not be economically viable until the additional chemicals are authorized.

Yes _____ No X Does your project meet any of the criteria listed above?

If "No", continue to next rule question

If "Yes", an exemption may not be claimed

D. §106.4(c) - (d): Compliance with all Rules

Yes X No _____ Will the facility comply with all rules and regulations of the TNRCC, the intent of the Texas Clean Air Act, and any local permitting or registration requirements?

If "Yes", continue to next rule question

If "No", an exemption may not be claimed.

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E. §106.4(a)(1): Emission limits check

Yes X No _____ The maximum emissions from all facilities at the site, including this exemption claim, are less than the tpy of any contaminant.

If the answer to this question is "Yes", no further review is needed to complete this checklist.

Forward all information needed to verify your exemption claim to the TNRCC.

If "No", please continue through the remaining applicable pages of the checklist.

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**Exemption §106.352, Checklist
(Previously Standard Exemption 66)**

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Oil and Gas Production, CO₂ Separation, and Pipeline Facilities

YOU MUST SUBMIT A PI-7 WITH REQUIRED ATTACHMENTS IF THE PROJECT COVERED BY THIS EXEMPTION INCLUDES HANDLING GAS WITH A HYDROGEN SULFIDE CONCENTRATION GREATER THAN 1.5 GR/100 SCF OR A TOTAL SULFUR CONCENTRATION GREATER THAN 30 GR/100 SCF.

The following checklist is designed to help you confirm that you meet Exemption §106.352, previously standard exemption 66 (STDY 66), requirements. **Any "no" answers indicate that the claim of registration may not meet all requirements for the use of Standard Exemption 66.** If you do not meet all the requirements, you may alter the project design/operation in such a way that all the requirements of the exemption are met or obtain a construction permit.

<u>YES</u>	<u>NO</u>	<u>NA</u>	<u>DESCRIPTION</u>
<u>X</u>	—	—	Have you included a description of how this exemption claim meets the general rule for the use of exemptions (§106.4 checklist is available)?
<u>X</u>	—	—	Are all the facilities covered by this exemption specifically named in the general section of §106.352, previously STDY 66?
<u>X</u>	—	—	Are all the facilities associated with production, conditioning, processing, and pipeline transfer of fluids found in geologic formations beneath the earth's surface?
—	—	<u>X</u>	Will gas sweetening, sulfur recovery, or other gas conditioning facilities only condition gas that contains less than two (2) long tons per day of sulfur compounds as sulfur?
—	—	<u>X</u>	Do all compressors and flares fully meet the requirements of §106.512 and §106.492, previously STDYs 6 and 80, respectively? Attach data showing how the exemptions are met. Checklists are available.
—	—	<u>X</u>	Have registrations (PI-7) for all compressors and flares (sour gas only) been filed if they are not included in this registration?
—	—	<u>X</u>	If the facility handles sour gas, is it located at least 1/4 mile from any recreational area, residence, or other structure not occupied or used solely by the owner or operator of the facility or the owner of the property upon which the facility is located? Attach a scaled map.
—	—	<u>X</u>	Are total emissions of sulfur compounds, excluding sulfur oxides, less than 4.0 pounds per hour? Attach calculations.
—	—	<u>X</u>	Does the height of each vent emitting sulfur compounds meet or exceed the minimum vent height stated in §106.352, previously STDY 66? Required height _____ Actual height _____
—	—	<u>X</u>	If the facility was constructed under §106.353, previously STDY 67, does it meet all the requirements of §106.352, previously STDY 66, including registration prior to start of operations when sour gas is handled?

Exemption §106.352, previously 66 Checklist
Page 2

- X — — Have you attached calculations and other data, such as a gas analysis, showing that the emissions limits of the general rule are met?
- X — — If a glycol dehydrator is used, have VOC emissions from the still been calculated by use of an acceptable software program or a rich/lean analysis? If glycol dehydrator still vents must be controlled to stay within §106.4(a)(1) limits, describe the controls.

Revised 3/97

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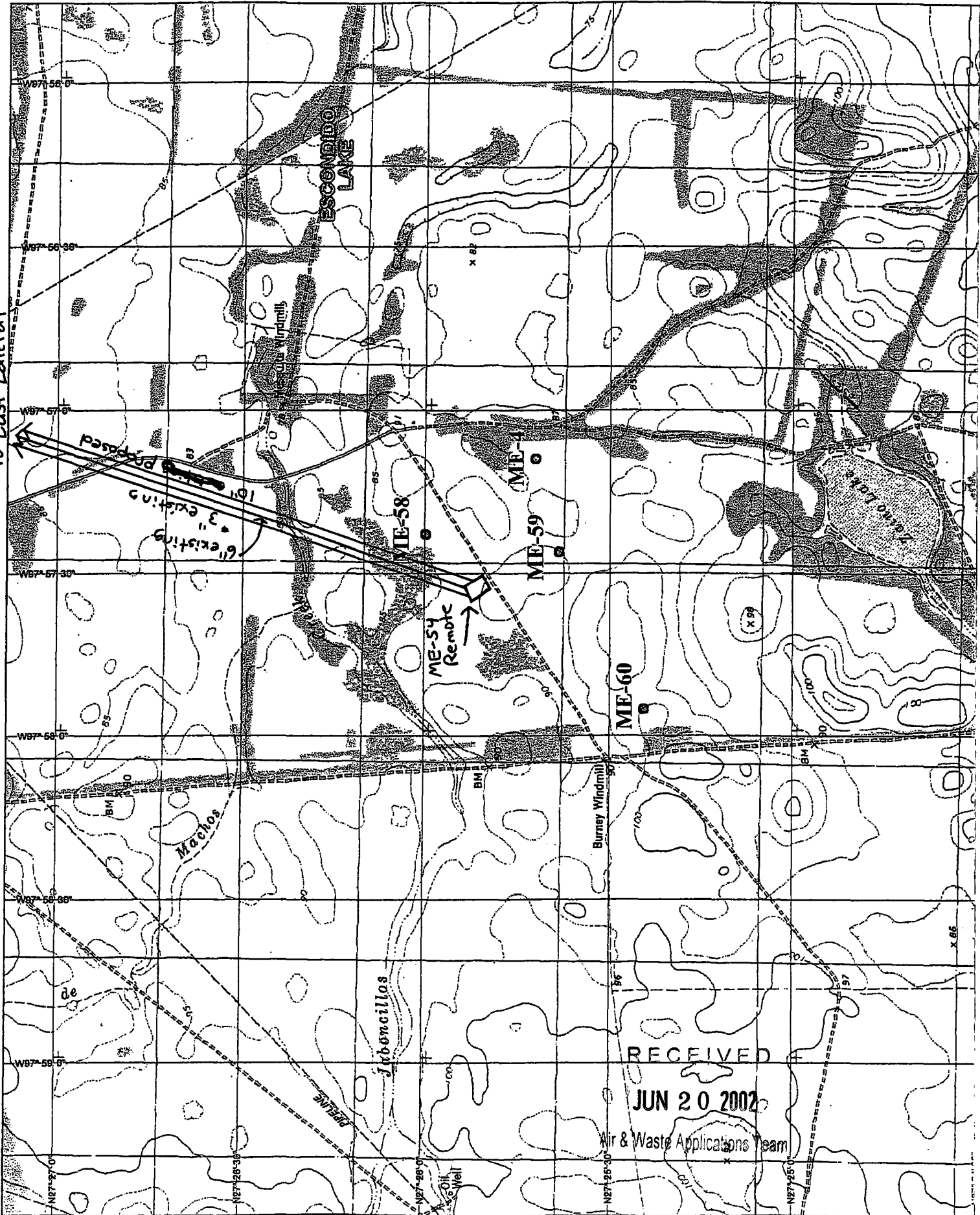
Area Map & Plot Plan

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To East Lateral

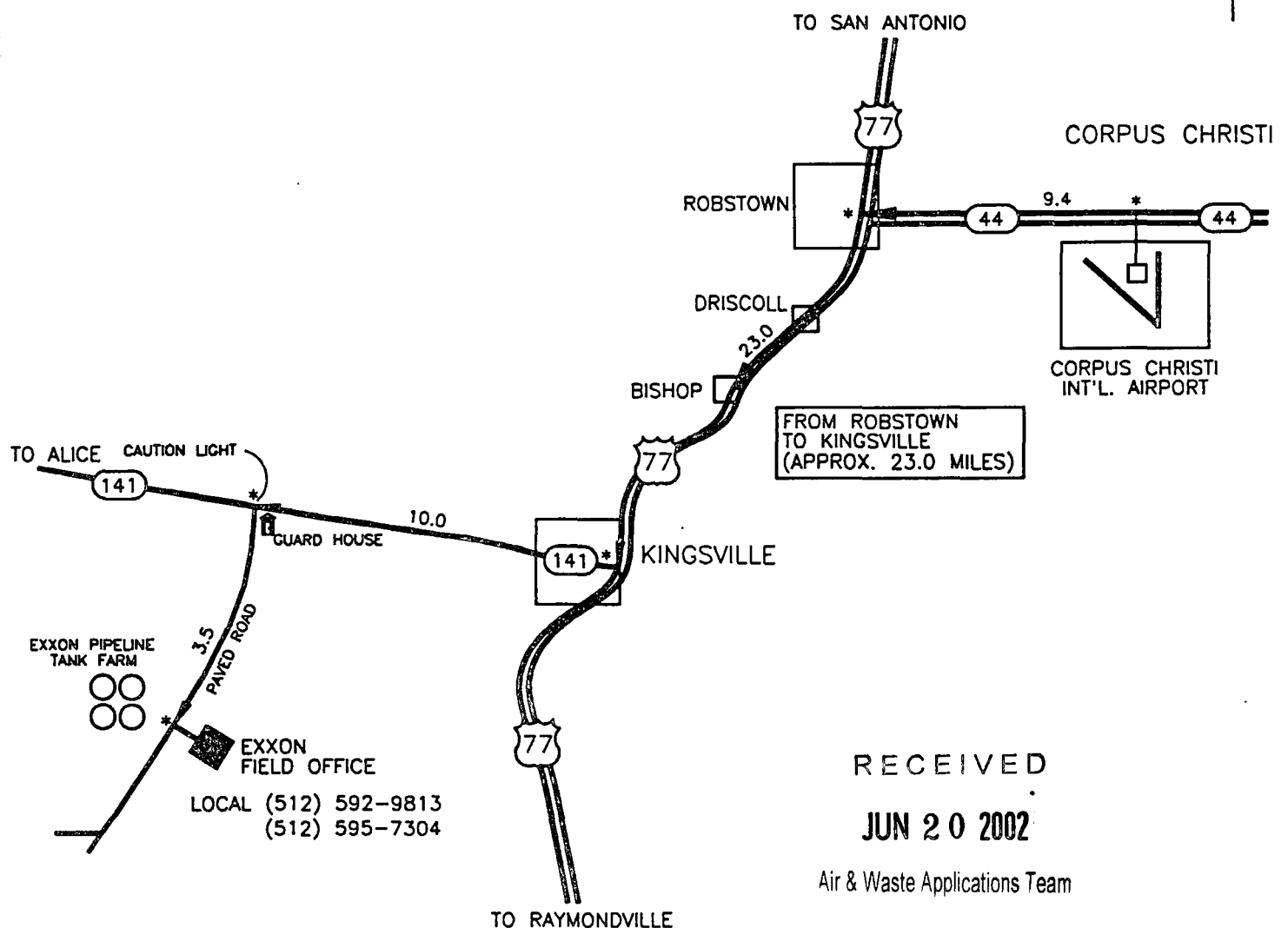


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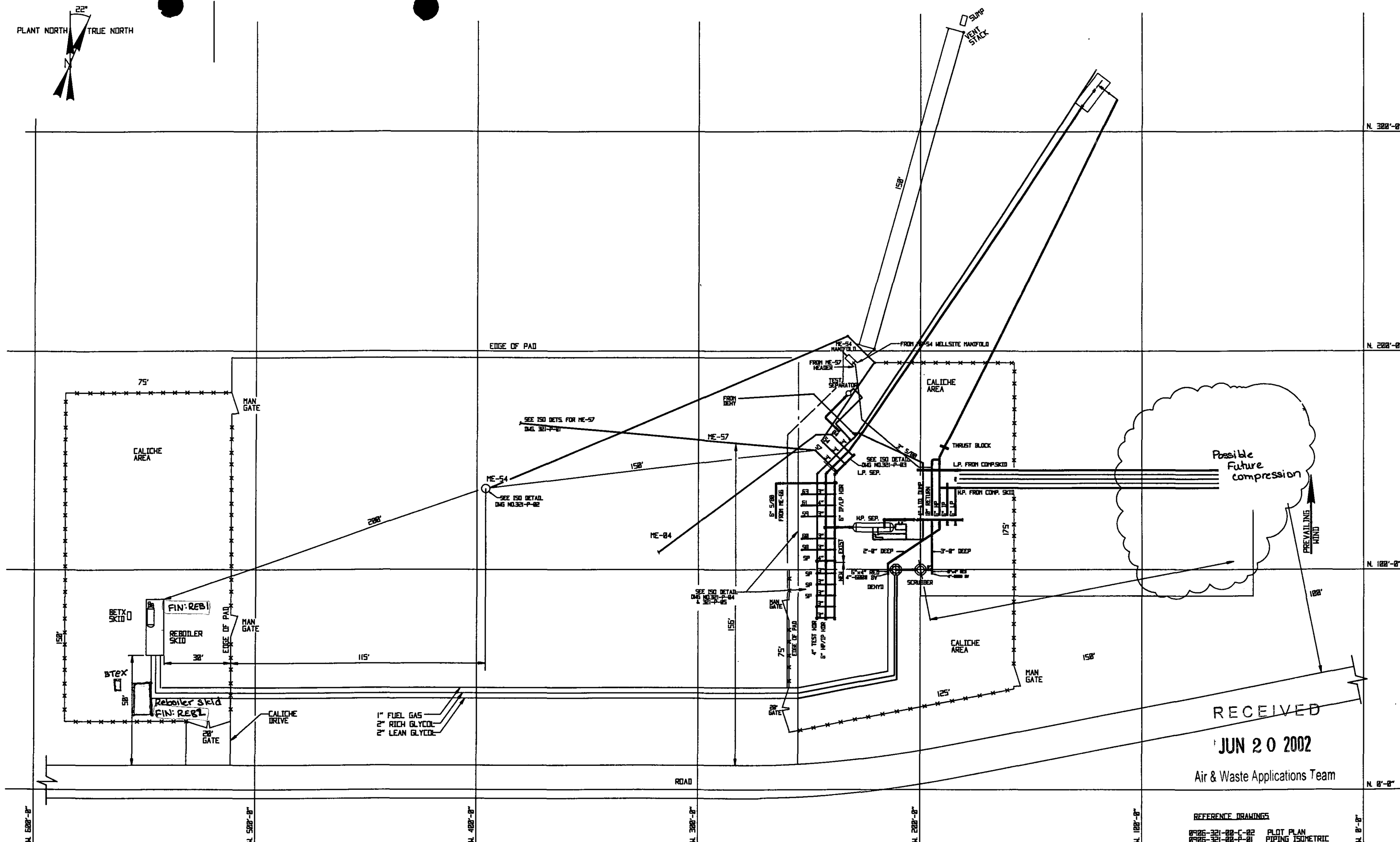
- FROM CORPUS CHRISTI INTERNATIONAL AIRPORT TURN LEFT (WEST) ON ST. HWY. 44 TO ROBSTOWN (APPROXIMATELY 9.4 MILES) AND U.S. HWY. 77 AND
- TURN LEFT (SOUTH) AND CONTINUE THROUGH DRISCOLL, AROUND BISHOP TO KINGSVILLE AND STATE HWY. 141 (APPROX. 23.0 MILES) AND EXIT RIGHT (WEST) ON ST. HWY. 141
- CONTINUE ON ST. HWY. 141 (APPROX. 10.0 MILES) TO A CAUTION LIGHT AND TURN LEFT (SOUTH) ON A PAVED ROAD AND (WATCH FOR GUARD HOUSE)
- CONTINUE (SOUTH) ON PAVED ROAD (APPROX. 3.5 MILES) TO THE EXXON FIELD OFFICE ON THE LEFT (EXXON PIPELINE TANK FARM ON THE RIGHT)



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NO.	DATE	REVISION	BY	CHK	APPR.	EXXON CORPORATION PRODUCTION DEPARTMENT				ROAD MAP TO THE BORREGOS FIELD OFFICE					
0	12/13/92	ORIGINAL DRAWING	RRN							BORREGOS/ALAZAN WORK AREA BORREGOS FIELD KLEBERG COUNTY, TEXAS					
1	04/26/94	REVISED TELEPHONE NUMBER	RRN												
2	11/10/94	REV. PER MARK-UPS	TLR												
						SCALE	REVISION	YEAR	SIZE	DIV.	FIELD	FACILITY	CLASS	TYPE	SEQUENCE
						NONE	1	1994	A	TX	0906	010	00	B	02



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REFERENCE DRAWINGS

0906-321-00-C-02	PLOT PLAN
0906-321-00-P-01	PIPING ISOMETRIC
0906-321-00-P-02	PIPING ISOMETRIC
0906-321-00-P-03	PIPING ISOMETRIC
0906-321-00-P-04	PIPING ISOMETRIC
0906-321-00-P-05	PIPING ISOMETRIC

[illegible]

NSR Permit/Registration Application Processing Checklist

Phase 1:

- ☒ Application/Permitting Request date stamped on Team received date.
- ☒ Verified appropriate and current application PI form, or letter for Alterations. (Return any non -reg PBR's without PI-7 and any letters without PI-7 forms for unconfirmed (denied) PBRs).
- ☒ Application Entered into IMS on Received Date, no later than Noon (see NSR guidance information and central registry data standards.)
 - ☒ researched site specific account number to complete entry (use PSDB and IMS for research of site)
 - ☒ researched applications to ensure not duplicate entry (call tech staff or applicant to confirm before creating a new project if you cant' make the determination (no assumptions))
- ☐ For Portables:
 - ☐ Identified existing account number
 - ☐ Assigned a new account number and logged it in paradox account number log and enter record in PSDB.
- ☒ Mikey has been placed in file and each field has been verified to conform with the agency data standards, US postal service address standards, and appropriate information as supplied by the applicant.
- ☒ assign new permit number or determine existing number (For changes to issued PBR's, use the same registration number and project type code XLTR; use a new number if the original PBR claim was never issued)
 - ▶ If existing permit number, select "version".
 - ▶ If new, select "from sequence"
 - ▶ If project type will not result in a new NSR permit/registration select "No Version" (example: a waste project; start of operation notification; transfer, etc.)
 - ▶ For Portables, go to project attributes indicating portable, then assign permit no. by selecting 1) "from sequence" if assigning first version, and 2) "version" if existing permit; then and "L" will appear with the next version number, which is three digits starting with 001.
- ☐ Problems for Phase 2 to address as noted above.

Notes for Phase 2 to address (address the specific problem & what you already researched):

- ☐ Problem with official contact name
 - ☐ Problem with Account number
 - ☐ Contact address not entered - appear incorrect
 - ☐ Nearest City or County problem
 - ☐ Address not in USPS system as valid
-
-
-

- ☐ **Multiple Project Records (Mikies) Included.** (Make sure each project record is updated throughout the process.)
(Account Nos. starting with "9" for portable facilities usually have the multiple projects)

Prepared file folder (Applies to all application types to ensure the complete package with Mikey stays together in transit.):

- ☒ Used appropriate labels for specified for PBR, Permitting and Confidential folders
- ☒ Printed File label contains the:
 - Name
 - County
 - Account Number
 - Registration/Permit No.
 - Regulated Entity No. (If applicable) (Phase 2 will need to add it to label)
- ☐ Prepared Confidential file folder
 - ☐ stamped folder with confidential stamp and cross-reference confidential materials in open file
 - ☐ prepared file label to indicate confidential documents
 - ☒ confidential file not applicable

Place project in chronologic date by project type to begin phase 2;

Phase 2:

- ☐ Obtained Core Data Form, if needed. (Follow procedures to get RN/CN Number if needed)
- ☒ Verified Applicants' Legal Name as needed (using guidance document) (Name must be confirmed before further processing)
 - ☒ Spelling of applicants' legal name is correct on application
 - ☐ For Individuals, complete name of individual has been provided.
 - ☒ For Companies, complete legal name as registered with SOS have been provided.
 - ☒ Charter number as provided by SOS 3362806
 - ☒ Status confirmed as Active with SOS
 - ☐ If charter number not provided and name does not match with SOS filing:
 - ☐ Called applicant to confirm correct information
 - ☐ Documented information provided by SOS on phone memo in file.
 - ☐ Governmental Agency (City, County, Federal etc.), Rail Roads, Insurance Companies, and Banks (no verification required but use consistent entry of full name in IMS- use agency data standards for abbreviations.)
 - ☐ Documented confirmation from applicant of correct legal name or other information on phone memo in file (if name is found to be different than provided on the PI form, the applicant must correct it)
- ☒ Prepared and faxed Account/RN/CN Request Form (if applicable).
 - ☒ placed copy of fax confirmation and request in application file
 - ☒ updated IMS tracking element code to indicate date Account/RN request sent
 - ☒ made sure the request indicates the appropriate contact for returning the number
 - ☒ updated IMS tracking element code to indicate date Account/RN request received
 - ☒ updated the Account/RN/CN Number in IMS
 - ☐ not applicable
- ☐ Prepared and faxed Site Review/Request for Comment (see processing chart)
 - ☐ placed copy of fax confirmation and SR/RFC in application file
 - ☐ made sure the SR/RFC request indicated the appropriate contact for returning the review
 - ☐ sent SR/RFC to appropriate local program if applicable
 - ☐ Entered IMS SR/RFC and local program tracking elements and date sent in IMS
 - ☒ SR/RFC not applicable
- ☒ Applicant indicated on the PI Form that copies of application were sent to appropriate regional office and other entities as required on application. (Does not apply to action where PI Form is not required.)
 - ☐ If no, called applicant to request copies be sent as required and document phone call on attached phone memo.
- ☒ Verified original signature on application. Applies only to PI-1 forms (Faxed PBRs are acceptable.)
- ☒ Verified fee Payment and updated amount and date in IMS (see processing chart for applicability)
 - ☐ placed fee receipt in application folder
 - ☒ fee not applicable

Deficiencies with applications:

- ☐ Noted phone call(s) on attached memo documenting requested information and response (put date by each call).
- ☐ Entered date of phone call in IMS using the admin deficient tracking element, then the A-telcom for additional calls.
- ☐ Entered date in admin deficient tracking element when applicant responds to request for information.
- ☒ Public Notice not Applicable (see processing chart for applicability)

For Amendment Applications where Public Notice is not applicable:

- ☐ Prepared State Rep and Senate Letter (HB2518 requirement) and envelop
- ☐ Enter Leg Letter tracking element in IMS
- ☐ Put copies of Leg Letters in file with application.
- ☐ Place letters in file for proofing when file is being proofed for transfer.

Continuation of Phase 2 - The following items only apply to projects requiring public notice:

- ☐ For Permits with terms, confirmed that the permit has not expired.
 - ☐ Permits expired must be process for a new permit
- ☐ Verified appropriate notice information has been provided (if applicable). (Ensure the applicant provides any corrections or updates to the application in writing (fax or hard copy). Do not fill in any part of the application yourself)
 - ☐ public place for viewing and copying application in county where located is provided
 - ☐ person representing applicant identified as contact in public notice
 - ☐ person responsible for publishing notice identified
- ☐ Prepared public notice package as checked off below:
 - ☐ right side of folder in following order included:
 - ☐ Legislative notification letters and envelopes
 - ☐ Public Notice Cover Letter to Applicant
 - ☐ Public Notice and Sign Postings (Examples)
 - ☐ Instructions & Affidavits
 - ☐ Address Labels
 - ☐ Contacts Sheet (Blue paper)
 - ☐ Spanish Shell provided (if applicable)
 - ☐ left side of folder in following order included:
 - ☐ Application Routing information (Blue paper)
 - ☐ fax confirmation sheet
 - ☐ written note on fax confirmation indicating person you spoke with confirming fax as received, date and time of call
 - ☐ copy of fax to review draft notice
 - ☐ copy of Bilingual Notice Determination sheet fax with draft notice language (for CCO to know to expect bilingual notice)
- ☐ Prepared fax with draft public notice and sent to applicant for confirmation.
 - ☐ called applicant to ensure receipt of fax and need to follow up (stress sense of urgency-give 24 hour due date)
 - ☐ placed copy of confirmation fax in the permit application folder
 - ☐ faxed spanish notice shell to applicant if confirmation fax indicates required. If other language, indicate applicant's responsibility to have translated.

- ☒ Confirmed IMS updates and tracking elements with dates as indicated (as applicable):
- ☐ Enter tracking element in IMS for Site Review using A-Site Review and date sent
 - ☐ Enter tracking element in IMS for Request for Comment using A-RFC and date sent
 - ☐ Enter Local Program Site Review/RFC using appropriate local program tracking element in IMS and date sent
 - ☒ Enter Account Number (ARF) tracking element in IMS
 - ☒ Entered Account number assigned by Region & Portable assigned by Team
 - ☐ Admin Def. date/phone calls for information or clarification - tracking element A-Admin Def Cycle
 - ☐ Additional phone calls date using A-TELCOM
 - ☐ Enter date of response received from applicant using tracking element A-Admin Def Cycle
 - ☒ Verified Applicant and Contact information for accuracy
 - ☒ Verified entry of applicant's legal name, to be correct spelling, in IMS & PSDB
 - ☒ PAR transfer date

The following tracking elements in IMS are only required when Public notice is required:

- ☐ Enter A-Comp History RFC for Compliance History request and enter date sent
- ☐ Enter A-ADMIN Comp w/Notice and admin complete date
- ☐ Enter A-Admincomp tracking element and Admin Complete date
- ☐ Entered A-PN Draft when draft public notice was faxed
- ☐ Entered A-PN Draft Approved when you receive approval of the draft from applicant
- ☐ Flagged "Yes" for PN
- ☐ Flagged "Yes" for bilingual notice required

Call To: _____

Call From: _____

File No: _____

Applicant Name: _____

Phone number : _____