

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

GENERAL OPERATING PERMIT (GOP) INITIAL ISSUANCE

GOP Type:	514	Company:	EagleClaw Midstream Ventures, LLC
Permit #:	O4386	Site:	Pecos Bend Gas Processing Plant
Project #:	33709	Application Area:	Pecos Bend Gas Processing Plant
Regulated Entity #:	RN109238691	Customer #:	CN604921882
Region:	7	County:	Reeves
NAICS Code:	211112	NAICS Name:	Natural Gas Liquid Extraction
Permit Reviewer:	Monica Cates		

SITE INFORMATION

Physical Location: From Pecos, take Highway 285 N from IH 20 to the intersection of Highway 285 and County Road 402. Turn right on CR 402 and go 1.6 mi north to the plant road which will be on the west side of CR 402

Nearest City: Pecos

Major Pollutants: CO, NOX, VOC

Additional FOPs: None

PROJECT SUMMARY

EagleClaw Midstream Ventures, LLC – Pecos Bend Gas Processing Plant site is a natural gas liquid extraction facility and a major source of emissions. The initial issuance application was received on 05/04/2022. Some of the significant emission sources at the site include engines, fugitives, flares, and boilers. The emission sources are subject to State and/or Federal regulations. The GOP includes general and special terms and conditions and unit-specific applicable requirements which were identified using information provided by the applicant in potentially various forms (OP-SUM, OP-REQ1, and various Unit Attribute forms).

PROCESS DESCRIPTION

At the low-pressure inlet of the plant, natural gas enters the site through the inlet compressors from where low-pressure liquids are routed through a closed drain drum and low-pressure gas is compressed into the high-pressure inlet of the plant. Flash at the closed drain drum is routed process with produced water sent to the produced water tanks prior to being trucked from the facility. Condensate from the closed drain drum is pumped to the stabilizer.

At the high-pressure inlet, natural gas enters the site through a surge vessel or inlet slug catchers where high-pressure gas enters one of the three remaining gas plants. High pressure liquids are routed to the stabilizer, heated by stabilizer reboilers where stabilized condensate is stored in eight (8) 400-bbl storage tanks prior to being trucked from the facility. Stabilizer overhead vapors are captured and recompressed by electric compressors. All tank emissions and captured condensate truck loading emissions are controlled by the tank flare.

High pressure gas is routed to either Plant 2, Plant 3, or Plant 4 where it is dehydrated by their respective mole sieve dryers regenerated by mole sieve heaters. Plant 2 also utilizes a TEG dehydration unit heated by a glycol reboiler with flash gas used as fuel. Regenerator emissions routed to a BTEX unit that is controlled by a BTEX combustor.

Dry natural gas then enters one of the cryogenic plants where natural gas liquids (NGLs) are condensed and residue gas is separated out. These plants utilize hot oil as a heat medium, heated by their respective heaters. NGLs are routed to their respective amine product treaters. The product treaters utilize hot oil as a heat medium. Plant 2 has a single hot oil heater for both the amine and the plant. Plant 3 and 4 amine units have their own hot oil heaters. Flash gas from the product treaters is used as plant fuel and acid gas is routed to their respective thermal oxidizers. NGLs from the product treaters exit the site via pipeline. Residue gas from the cryogenic processes is recompressed by their respective residue compressors.

Plant 2 utilizes three (3) Caterpillar 3612LE A3s (C-2060, C-2061, C-2062), Plant 3 utilizes three (3) Caterpillar G3616LE A3s (C-3A, C-3B, C-3C), and Plant 4 utilizes three (3) Caterpillar G3616LE A3s (C-4A, C-4B, C4C). Recompressed residue gas exits the site via pipeline.

Plant 2, Plant 3, and Plant 4 also have plant flares (FL-9120, FL-3991, FL-4991) that are utilized for emergency pressure relief and maintenance emissions. In addition, there will be emissions from fugitives (FUG-1, FUG-2, FUG-3, FUG-4, FUG-R).

TECHNICAL REVIEW

Application/Project Summary

1. Were any of the GOP index Nos. submitted in this application revised or updated?..... Yes
a. Were any of these resolved without the submittal of a new UA form?..... No
2. Were provisional requirements or form OP-REQ3 submitted?..... No
3. Was form OP-REQ2 submitted?..... No
4. Were any high-level GOP index numbers included in the IMS for this project?..... No
5. Was Periodic Monitoring (PM) required and included in the IMS?..... No
6. Was Compliance Assurance Monitoring (CAM) required and included in the IMS?..... No
7. Was monitoring added in the IMS for emission limits identified in a Standard Permit or PBR?..... No

Permit reviewer notes:

The following forms were submitted in the application: TCEQ Core Data Form, OP-CRO1, OP-1, OP-SUM, OP-REQ1, OP-PBRSUP, OP-ACPS, OP-UA2, OP-UA3, OP-UA6, OP-UA7, OP-UA10, and OP-UA12. A list of deficiencies/discrepancies were found and listed below.

An Intro and Request for information (RFI) email was sent to the applicant on August 11, 2022, with a due date of August 22, 2022. The RFI requested the following:

- An OP-PBRSUP form since it was not included in the application.
- An OP-REQ1 page 87 due to not listing the PBR correctly and with the issuance date of the PBR registration
- An updated OP-UA2 Table 2a due to inconsistency with the code and the GOP Index No. for both group IDs
- An updated OP-UA2 Table 4a due to an outdated form question no longer valid for both group IDs
- An updated OP-UA2 Table 4a due to an unnecessary code for group ID GRP-RESEI-COMP.
- An updated OP-UA7 Table 1 due to two unnecessary codes for FL-9120, FL-3991, and FL-4991.
- An updated OP-SUM to include the units that were on OP-UA12 Table 19b since they were not originally listed on the form.

The requested forms were received on August 24, 2022; however, two issues were still not resolved, as listed below:

- The OP-REQ1 page 87 was received; however; the requested change was not made.
- The OP-UA2 Table 2a was revised with the GOP Index No changed from "**514-21-035**" to "**514-21-016**" for both group IDs.
- The OP-UA2 Table 4a was revised with only the question "National Security" changed to "Exemption"; however, the code was still incorrect.

Another RFI email was sent to the applicant on September 1, 2022, with a due date of September 2, 2022. The RFI requested the following:

- An OP-REQ1 page 87 due to not listing the PBR correctly and with the issuance date of the PBR registration
- An updated OP-UA2 Table 4a due to an invalid code for both group IDs
- A final OP-CRO1 with submittal dates of August 24, 2022 and submittal date of new updated forms.

The requested forms were received on September 1, 2022, along with the OP-CRO1 signed electronic copy. These forms resolved all the remaining issues.

Prior to issuance of the Authorization to Operate (ATO) it was discovered that the applicant did not provide the Table D of the OP-PBRSUP form. The permit reviewer contacted the technical contact and requested the missing table, along with an OP-CRO1. The OP-PBRSUP was submitted with unit IDs MSS1, BLD1, FL-9120, FL-3991, and FL-4991 authorized under unregistered PBR No. 106.359. Monitoring was provided on Table D of the form for both units.

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on August 11, 2022

Site rating: 0.00 / High Compliance rating: 0.06 / Satisfactory (High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55) Was an OP-ACPS submitted and are any units not in compliance?

4. Was an OP-ACPS submitted and are any units not in compliance?..... No

Delinquent Fee Check

1. The delinquent fee check was performed on May 9, 2022.

2. Were there any delinquent fees owed? No

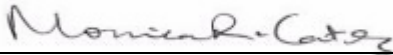
Permit reviewer notes:

The delinquent fee check was performed by a member of APIRT on May 9, 2022, and there were no delinquent fees for the company.

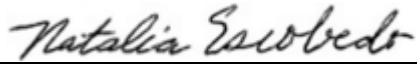
IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	05/04/2022	
Date Project Received by Engineer	05/19/2022	
Technical Review Period	07/26/2022	09/02/2022

EFFECTIVE PERMIT ISSUANCE DATE: September 14, 2022


 09/02/2022

 Monica Cates
 Permit Reviewer
 Operating Permits Section
 Air Permits Division


 09/12/2022

 Natalia Escobedo
 Team Leader
 Operating Permits Section
 Air Permit Division

CONTACT INFORMATION

Responsible Official:

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Permit Consultant:

Same as the Technical Contact