



EOG Resources, Inc.
P.O. Box 592929
San Antonio, TX 78259-0196

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Building 2
San Antonio, TX 78259-1828
(210) 403-7700

May 2, 2024

Texas Commission on Environmental Quality (TCEQ)
Air Permits Initial Review Team (APIRT), MC 161

Office of Permitting, Remediation, and Registration
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Re: Revision to Permit by Rule Registration No. 118743
30 TAC §106.4, §106.352, and §106.492
EOG Resources, Inc., CN600124333
Hoff G&H Telluride Production Facility, RN107202129
Los Angeles, La Salle County

Attn: APIRT

On behalf of EOG Resources, Inc., I am submitting the enclosed Permit by Rule (PBR) revision for the Hoff G&H Telluride Production Facility in La Salle County, Texas under 30 Texas Administrative Code (TAC) §106.4, §106.352, and §106.492. The Hoff G&H Telluride Production Facility is currently authorized under Permit No. 118743. With this application, EOG is:

- Revising the name of the Facility to Hoff G&H Telluride Production Facility (a TCEQ Core Data Form is being submitted separate of this application),
- Removing service of 4 oil storage tanks and 1 produced water storage tank,
- Converting one oil tank to a water tank,
- Revising the control efficiency of the VRU system and adding a blower as part of the tank vapor capture system,
- Adding one heater treater, which may be added in the future,
- Revising production to reflect current conditions at the Facility,
- Adjusting fugitive component estimates and associated emissions, and
- Using BRE ProMax for process simulation to estimate emission rates from the flares (EPN FL-1) and loading operations (EPN LOAD).

The attached PI-7-CERT and administrative documents, including required TCEQ forms and technical documents, are submitted in support of this registration. EOG does not wish to register and certify MSS emissions, which are authorized under 106.359. EOG acknowledges the emission limits of 106.4, and these emission limits will not be exceeded. Records will be retained as required to demonstrate compliance with 106.4, 106.352, 106.359, and 106.492.

If you have any questions, please call me at (210) 409-3488.

Sincerely,

A handwritten signature in blue ink that reads "Matthew Zidek".

Matthew Zidek
Senior Safety and Environmental Specialist

Attachments



TCEQ Use Only

TCEQ Core Data Form

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
☐ New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
☐ Renewal (Core Data Form should be submitted with the renewal form)	☒ Other Facility Name Change	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 600124333		RN 107202129

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)	
☐ New Customer ☐ Update to Customer Information ☐ Change in Regulated Entity Ownership			
☐ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)			
The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).			
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)		If new Customer, enter previous Customer below:	
NO CHANGE			
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number (if applicable)
11. Type of Customer: ☐ Corporation ☐ Individual Partnership: ☐ General ☐ Limited			
Government: ☐ City ☐ County ☐ Federal ☐ State ☐ Other		☐ Sole Proprietorship ☐ Other:	
12. Number of Employees		13. Independently Owned and Operated?	
☐ 0-20 ☐ 21-100 ☐ 101-250 ☐ 251-500 ☐ 501 and higher		☐ Yes ☐ No	
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following:			
☐ Owner ☐ Operator ☐ Owner & Operator			
☐ Occupational Licensee ☐ Responsible Party ☐ Voluntary Cleanup Applicant ☐ Other:			
15. Mailing Address:			
	City	State	ZIP
16. Country Mailing Information (if outside USA)		17. E-Mail Address (if applicable)	
18. Telephone Number	19. Extension or Code	20. Fax Number (if applicable)	
() -		() -	

SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If 'New Regulated Entity' is selected below this form should be accompanied by a permit application)	
☐ New Regulated Entity ☒ Update to Regulated Entity Name ☐ Update to Regulated Entity Information	
The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC.)	
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)	
Hoff G&H Telluride Production Facility	

23. Street Address of the Regulated Entity: <i>(No PO Boxes)</i>								
	City		State		ZIP		ZIP + 4	
24. County	La Salle							
Enter Physical Location Description if no street address is provided.								
25. Description to Physical Location:	FROM LOS ANGELES, TRAVEL 3 MILES WEST ON SH 97 TO THE ENTRANCE ON THE LEFT.							
26. Nearest City					State		Nearest ZIP Code	
Los Angeles					Tx		78014	
27. Latitude (N) In Decimal:			28. Longitude (W) In Decimal:					
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds			
29. Primary SIC Code (4 digits)		30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)		
1311				211120				
33. What is the Primary Business of this entity? <i>(Do not repeat the SIC or NAICS description.)</i>								
34. Mailing Address:	PO Box 592929							
	City	San Antonio	State	TX	ZIP	78259	ZIP + 4	
35. E-Mail Address:								
36. Telephone Number			37. Extension or Code			38. Fax Number <i>(if applicable)</i>		
() -						() -		

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

☐ Dam Safety	☐ Districts	☐ Edwards Aquifer	☐ Emissions Inventory Air	☐ Industrial Hazardous Waste
☐ Municipal Solid Waste	☒ New Source Review Air	☐ OSSF	☐ Petroleum Storage Tank	☐ PWS
☐ Sludge	☐ Storm Water	☐ Title V Air	☐ Tires	☐ Used Oil
☐ Voluntary Cleanup	☐ Waste Water	☐ Wastewater Agriculture	☐ Water Rights	☐ Other:

SECTION IV: Preparer Information

40. Name:	Matthew Zidek		41. Title:	Safety & Environmental Specialist	
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address		
(210) 409-3488		() -	matthew_zidek@eogresources.com		

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	EOG Resources, Inc	Job Title:	Safety & Environmental Specialist	
Name(In Print) :	Matthew Zidek		Phone:	(210) 409-3488
Signature:			Date:	



Texas Commission on Environmental Quality

Hoff G&H Telluride Production Facility

PI-7-CERT Update to Registration for PBR §106.4, §106.352, §106.492
Permit No. 118743
Los Angeles, La Salle County
Regulated Entity No.: RN107202129
Customer No.: CN600124333

**Texas Commission on Environmental Quality
Certification and Registration for Permits by Rule
Form PI-7-CERT
(Page 1)**

I. Registrant Information		
A. Company or Other Legal Customer Name: EOG Resources, Inc.		
B. Company Official Contact Information (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Other _____)		
Name: Matthew Zidek		
Title: Senior Safety and Environmental Specialist		
Mailing Address: P.O. Box 592929		
City: San Antonio	State: Texas	ZIP Code: 78259
Phone: 210-409-3488	Fax:	
E-mail Address: matthew_zidek@eogresources.com		
<i>All PBR registration responses will be sent via e-mail.</i>		
C. Technical Contact Information (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Other _____)		
Name: Matthew Zidek		
Title: Senior Safety and Environmental Specialist		
Company Name: EOG Resources, Inc.		
Mailing Address: P.O. Box 592929		
City: San Antonio	State: Texas	ZIP Code: 78259
Phone: 210-409-3488	Fax:	
E-mail: matthew_zidek@eogresources.com		
II. Facility and Site Information		
A. Name and Type of Facility		
Facility Name: Hoff G&H Telluride Production Facility		
Type of Facility:	☒ Permanent	☐ Temporary
For portable units, please provide the serial number of the equipment being authorized below.		
Serial No:	Serial No:	
B. Facility Location Information		
Street Address:		
If there is no street address, provide written driving directions to the site and provide the closest city or town, county, and ZIP code for the site (attach description if additional space is needed).		
FROM LOS ANGELES, TRAVEL 3 MILES WEST ON SH 97 TO THE ENTRANCE ON THE LEFT.		
City: Los Angeles	County: La Salle	ZIP Code: 78014

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II. Facility and Site Information <i>(continued)</i>	
C. TCEQ Core Data Form	
Is the Core Data Form (TCEQ Form Number 10400) attached?	☐ YES ☒ NO
If "NO," provide customer reference number (CN) and regulated entity number (RN) below.	
Customer Reference Number (CN): CN600124333	
Regulated Entity Number (RN): RN107202129	
D. TCEQ Account Identification Number (if known):	
E. Type of Action:	
☐ Initial Application ☒ Change to Registration	
For Change to Registration provide the Registration Number: 118743	
F. PBR number(s) claimed under 30 TAC Chapter 106	
(List all the individual rule number(s) that are being claimed.)	
106. 4	106.359
106. 352	106.
106. 492	106.
G. Historical Standard Exemption or PBR	
Are you claiming a historical standard exemption or PBR?	☐ YES ☒ NO
If "YES," enter rule number(s) and associated effective date in the spaces provided below.	
Rule Number(s)	Effective Date
H. Previous Standard Exemption or PBR Registration Number	
Is this authorization for a change to an existing facility previously authorized under a standard exemption or PBR?	☒ YES ☐ NO
If "YES," enter previous standard exemption number(s) and PBR registration number(s), and associated effective dates in the spaces provided below.	
Standard Exemption and PBR Registration Number(s)	Effective Date
PBR Registration No. 118743	

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II. Facility and Site Information <i>(continued)</i>	
I. Other Facilities at this Site Authorized by Standard Exemption, PBR, or Standard Permit	
Are there any other facilities at this site that are authorized by an Air Standard Exemption, PBR, or Standard Permit?	☐ YES ☒ NO
If "YES," enter standard exemption number(s), PBR registration number(s), and Standard Permit registration number(s), and associated effective date in the spaces provided below.	
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s)	Effective Date
J. Other Air Preconstruction Permits	
Are there any other air preconstruction permits at this site?	☐ YES ☒ NO
If "YES," enter permit number(s) in the spaces provided below.	
K. Affected Air Preconstruction Permits	
Does the PBR being claimed directly affect any permitted facility?	☐ YES ☒ NO
If "YES," enter the permit number(s) in the spaces provided below.	
L. Federal Operating Permit (FOP) Requirements (30 TAC Chapter 122 Applicability)	
1. Is this facility located at a site that is required to obtain an FOP pursuant to 30 TAC Chapter 122?	☐ YES ☒ NO ☐ To Be Determined
If the site currently has an existing FOP, enter the permit number:	
Check the requirements of 30 TAC Chapter 122 that will be triggered if this certification is accepted. <i>(check all that apply)</i>	
☐ Initial Application for an FOP ☐ Significant Revision for an SOP ☐ Minor Revision for an SOP ☐ Operational Flexibility/Off Permit Notification for an SOP ☐ Revision for a GOP ☐ To be Determined ☒ None	
2. Identify the type(s) of FOP issued and/or FOP application(s) submitted/pending for the site. <i>(check all that apply)</i>	
☐ SOP ☐ GOP ☐ GOP application/revision (submitted or under APD review) ☒ N/A ☐ SOP application/revision (submitted or under APD review)	

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III. Fee Information (See Section VII. for address to send fee or go to www.tceq.texas.gov/epay to pay online.)	
A. Fee Requirements	
Is a fee required per Title 30 TAC § 106.50?	☒ YES ☐ NO
If "NO," specify the exception. There are three exceptions to paying a PBR fee. (check all that apply)	
1. Registration is solely to establish a federally enforceable emission limit.	☐
2. Registration is within six months of an initial PBR review, and it is addressing deficiencies, administrative changes, or other allowed changes.	☐
3. Registration is for a remediation project (30 TAC § 106.533).	☐
B. Fee Amount	
1. A \$100 fee is required if <i>any</i> of the answers in III.B.1 are "YES."	
This business has less than 100 employees.	☐ YES ☒ NO
This business has less than \$6 million dollars in annual gross receipts.	☐ YES ☒ NO
This registration is submitted by a governmental entity with a population of less than 10,000.	☐ YES ☒ NO
This registration is submitted by a non-profit organization.	☐ YES ☒ NO
2. A \$450 fee is required for all other registrations.	
C. Payment Information	
Check/money order/transaction or voucher number:	
Individual or company name on check:	
Fee Amount: \$ 450	
Was fee paid online?	☒ YES ☐ NO
IV. Technical Information Including State And Federal Regulatory Requirements	
Check the appropriate box to indicate what is included in your submittal.	
NOTE: Any technical or essential information needed to confirm that facilities are meeting the requirements of the PBR must be provided. Not providing key information could result in a deficiency of the project.	
A. PBR requirements (Checklists are optional; however, your review will go faster if you provide applicable checklists.)	
Did you demonstrate that the general requirements in 30 TAC § 106.4 are met?	☒ YES ☐ NO
Did you demonstrate that the individual requirements of the specific PBR are met?	☒ YES ☐ NO
B. Confidential Information Included (If confidential information is submitted with this registration, all confidential pages must be properly marked "CONFIDENTIAL.")	☐ YES ☒ NO

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IV. Technical Information Including State and Federal Regulatory Requirements

(continued)

Check the appropriate box to indicate what is included in your submittal.

Note: Any technical or essential information needed to confirm that facilities are meeting the requirements of the PBR must be provided. Not providing key information could result in a deficiency of the project.

C. Process Flow Diagram	☒ YES ☐ NO
-------------------------	---

D. Process Description	☒ YES ☐ NO
------------------------	---

E. Maximum Emissions Data and Calculations	☒ YES ☐ NO
--	---

Note: If the facilities listed in this registration are subject to the Mass Emissions Cap & Trade program under **30 TAC Chapter 101, Subchapter H, Division 3**, the owner/operator of these facilities must possess NO_x allowances equivalent to the actual NO_x emissions from these facilities.

F. Is this certification being submitted to certify the emissions for the entire site?	☒ YES ☐ NO
--	---

If "NO," include a summary of the specific facilities and emissions being certified.

G. Table 1(a) (Form 10153) Emission Point Summary	☐ YES ☒ NO
---	---

H. Distances from Property Line and Nearest Off-Property Structure

Distance from this facility's emission release point to the nearest property line:	>50		feet
--	-----	--	------

Distance from this facility's emission release point to the nearest off-property structure:	>1320		feet
---	-------	--	------

I. Project Status

Has the company implemented the project or waiting on a response from TCEQ?	☒ Implemented ☐ Waiting
---	--

J. Projected Start of Construction and Projected Start of Operation Dates

Projected Start of Construction (provide date):	
---	--

Projected Start of Operation (provide date):	
--	--

V. Delinquent Fees

This form **will not be processed** until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ is paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ website at: www.tceq.texas.gov/agency/financial/fees/delin/index.html.

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VI. Signature For Registration And Certification

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which this application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382, the Texas Clean Air Act (TCAA); the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.

Name (printed):

Matthew Zidek

Signature (original signature required):

Date:

Save Form

Reset Form

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VII. Submitting Copies of the Certification and Registration		
Copies must be sent as listed below: Processing delays may occur if copies are not sent as noted.		
Who	Where	What
Air Permits Initial Review Team (APIRT)	Regular, Certified, Priority Mail MC 161, P.O. Box 13087 Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building C, Third Floor Austin, Texas 78753	Originals Form PI-7-CERT, Core Data Form, and all attachments. Not required if using ePermits ¹ .
Revenue Section, TCEQ	Regular, Certified, Priority Mail MC 214, P.O. Box 13088 Austin, Texas 78711-3088 Hand Delivery, Overnight Mail MC 214, 12100 Park 35 Circle, Building A, Third Floor Austin, Texas 78753	Original Money Order or Check, Copy of Form PI-7-CERT, and Core Data Form. Not required if fee was paid using ePay ² .
Appropriate TCEQ Regional Office	To find your Regional Office address, go to the TCEQ website at www.tceq.texas.gov/agency/directory/region , or call (512) 239-1250.	Copy of Form PI-7-CERT, Core Data Form, and all attachments. Not required if using ePermits
Appropriate Local Air Pollution Control Program(s)	To Find your local or Regional Air Pollution Control Programs go to the TCEQ, APD website at www.tceq.texas.gov/permitting/air/local_programs.html , or call (512)-239-1250	Copy of Form PI-7-CERT, Core Data Form, and all attachments.

¹ ePermits located at www3.tceq.texas.gov/steers/

² ePay located at www.tceq.texas.gov/epay

TCEQ-20182 (APDG 5379v25, revised 07/19) PI-7-CERT

This form is for use by facilities subject to air quality permit requirements and may be revised periodically.

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EOG RESOURCES, INC.

APRIL 2024

HOFF G&H TELLURIDE PRODUCTION FACILITY

PI-7-CERT Revision of Registration for Permit by Rule §106.4, §106.352, and §106.492

ATTACHMENT IV.A

PERMIT APPLICABILITY CHECKLISTS

**Texas Commission on Environmental Quality
Oil and Gas Handling and Production Facilities
Air Permits by Rule (PBR) Checklist
Title 30 Texas Administrative Code § 106.352(I)**

Check the most appropriate answer and include any technical information in the spaces provided. If additional space is needed, please include an extra page that references this checklist. The forms, checklists, and guidance documents are available from the Texas Commission on Environmental Quality (TCEQ), Air Permits Division Web site at: www.tceq.texas.gov/permitting/air/permitbyrule/subchapter-o/oil_and_gas.html. If you have any questions, or need additional assistance, please contact the Air Permits Division at (512) 239-1250.

The facility can register by submitting this application and any supporting documentation. Below is a checklist to ensure you have provided all appropriate documentation. For sites that require registration or if the company chooses to register the site with the TCEQ, a [Core Data Form](#) is required with this checklist. For additional assistance with your application, including resources to help calculate your emissions, please visit the Small Business and Local Government Assistance (SBLGA) webpage at the following link: www.TexasEnviroHelp.org.

This checklist is for use by the operator to ensure a complete application.	
Have you included each of the following items in the application?	
☒	Process Description.
☒	Plot plan or area map.
☒	TCEQ Oil and Gas Emission Calculation Spreadsheet (or equivalent).
☒	Detailed summary of maximum emissions estimates with supporting documentation, such as result reports from any emission estimation computer program.
☒	Gas and Liquid analyses. If a site specific analysis is not submitted, please provide justification as to why a representative site was used.
☒	Technical documents (manufacturer's specification sheet, operational design sheets)
☒	State and Federal applicability.
☒	Core Data Form (for new sites that have never been registered with the TCEQ).
1	Is the project located in one of the Barnett Shale counties and did the start of construction or modification begin on or after April 1, 2011? ☐ Yes ☒ No
<i>Note: Counties included in the Barnett Shale area: Cooke, , Dallas, Denton, , Ellis, Erath, Hill, Hood, Jack, Johnson, Montague, Palo Pinto, Parker, Somervell, Tarrant, and Wise counties.</i>	
For what is considered start of construction see: www.tceq.texas.gov/assets/public/permitting/air/Guidance/NewSourceReview/factsheet-const.pdf	
<i>If "Yes," do not complete this checklist. The project is subject to the requirements of §106.352(a)-(k). Additional information for Barnett Shale area projects can be found at:</i> www.tceq.texas.gov/permitting/air/permitbyrule/subchapter-o/oil_and_gas.html.	

**Texas Commission on Environmental Quality
Oil and Gas Handling and Production Facilities
Air Permits by Rule (PBR) Checklist
Title 30 Texas Administrative Code § 106.352(I)**

General Information and Questions/Descriptions (<i>continued</i>)	
2	Are the total site-wide emissions from all facilities claimed under 30 TAC §106.352(I) less than 25 tpy VOC, 250 tpy NOx, 250 tpy CO, and 25 tpy SO ₂ ? ☒ Yes ☐ No
3	Are there flares, engines, or turbines at the site? ☒ Yes ☐ No <i>If “Yes,” attach supporting documentation to demonstrate compliance with the requirements.</i> Additional information and checklists can be found at: §106.492 Flares: www.tceq.texas.gov/permitting/air/permitbyrule/subchapter-v/flares.html §106.512 Stationary Engines and turbines: www.tceq.texas.gov/permitting/air/permitbyrule/subchapter-w/stationary_eng_turb.html
4	Does any facility at the site handle a stream with more than 24 ppm hydrogen sulfide (H ₂ S)? ☒ Yes ☐ No <i>If “Yes,” proceed to question (4)(a) and (4)(b) and then proceed to questions 5 and 6 .</i> <i>If “No,” continue to questions 5 and 6.</i>
4a.	What is the actual H ₂ S content of the stream? <u>25</u> ppm <i>Site specific H₂S analysis is required.</i>
4b.	Indicate the actual distance from the nearest emissions point to the nearest offsite receptor: <u>>1320</u> ft. <i>Note: An offsite receptor includes any recreational area, residence, or other structure not occupied or used solely by the owner or operator of the facility. A facility handling sour gas must be located at least 1/4 mile from the nearest offsite receptor.</i>
5.	Indicate the total actual emission rate of sulfur compounds, excluding sulfur oxides, from all vents <u><0.01</u> lb/hr.
6.	Does the height of all vents at the site emitting sulfur compounds meet the minimum required height based on the H ₂ S emission rate in 106.352(I)(4)? ☒ Yes ☐ No <i>Note: Truck loading and fugitive sources are not considered vents.</i>

Recordkeeping: To demonstrate compliance with the requirements of the PBR, sufficient records must be maintained at all times. The records must be made available immediately upon request to the commission or any air pollution control program having jurisdiction. If you have any questions about the recordkeeping requirements, contact the Air Permits Division or the Air Program in the [TCEQ Regional Office](#) for the region in which the site is located.

Save Form

Reset Form



Exemption § 106.492 Checklist (Previously Standard Exemption 80) Smokeless Gas Flares

You must submit a PI-7 with required attachments before construction or operation if the gas burned in the flare has a sulfur or chlorine concentration greater than 24 ppmv.

The following checklist is designed to help you confirm that you meet Exemption § 106.492, previously standard exemption 80, requirements. **Any “NO” answers indicate that the claim of exemption may not meet all requirements for the use of Exemption § 106.492, previously standard exemption 80.** 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.

Question/Description	Response
Have you included a description of how this exemption claim meets the general rule for the use of exemptions (§ 106.4 checklist is available)?	☒ YES ☐ NO ☐ NA
Is the flare equipped with a tip designed to provide good mixing with air, flame stability and a tip velocity less than 60 ft/sec for gases having a lower heating value less than 1,000 BTU/ft ³ , or less than 400 ft/sec for gases with a LHV greater than 1,000 BTU/ft ³ ?	☒ YES ☐ NO ☐ NA
Attach a description including BTU content and tip velocity (Table 8 is available).	
Is the flare equipped with a continuously burning pilot or other automatic ignition system that assures gas ignition whenever vents are directed to the flare?	☒ YES ☐ NO ☐ NA
Attach a description of the system.	
If the flare emits more than 4 lb/hr of reduced sulfur compounds, excluding sulfur oxides, is it equipped with an alarm system that immediately notifies appropriate personnel when the ignition system ceases functioning?	☐ YES ☐ NO ☒ NA
Attach a description of the system.	
If the flare emits less than 4 lb/hr of reduced sulfur compounds and is not equipped with an alarm system, does the stack height meet the requirements of condition (d) of §106.352, previously standard exemption STDX 66?	☒ YES ☐ NO ☐ NA
Required Height: 20 feet	Actual Height: >20 feet
If the flare burns gases containing more than 24 ppmv of sulfur, chlorine or compounds containing either element, 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 flare or owner of the property where the flare is located?	☒ YES ☐ NO ☐ NA
Attach a scaled map.	

**Exemption § 106.492 Checklist
(Previously Standard Exemption 8o)
Smokeless Gas Flares**

Question/Description	Response
If the flare emits HCl, does the heat release (BRU/hr based on lower heating value) equal or exceed $2.73 \times 10^5 \times \text{HCl emission rate (lb/hr)}$?	☐ YES ☐ NO ☒ NA
Attach calculations.	
If the flare emits SO ₂ , does the heat release (BTU/hr based on lower heating value) equal or exceed $0.53 \times 10^5 \times \text{SO}_2 \text{ emission rates (lb/hr)}$?	☒ YES ☐ NO ☐ NA
Attach calculations.	
Will you limit the flare to burning only combustible mixtures of gases containing only carbon, hydrogen, nitrogen, oxygen, sulfur, chlorine, or compounds derived from these elements?	☒ YES ☐ NO ☐ NA
Will the gas mixture always have a net or lower heating value of at least 200 BTU/ft ³ prior to addition of air?	☒ YES ☐ NO ☐ NA
Do you understand and will you ensure that liquids shall never be burned in the flare?	☒ YES ☐ NO ☐ NA

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Texas Commission on Environmental Quality
Permit by Rule Applicability Checklist
Title 30 Texas Administrative Code § 106.4

The following checklist was developed by the Texas Commission on Environmental Quality (TCEQ), **Air Permits Division**, to assist applicants in determining whether or not a facility meets all of the applicable requirements. Before claiming a specific Permit by Rule (PBR), a facility must first meet all of the requirements of **Title 30 Texas Administrative Code § 106.4** (30 TAC § 106.4), "Requirements for Permitting by Rule." Only then can the applicant proceed with addressing requirements of the specific Permit by Rule being claimed.

The use of this checklist is not mandatory; however, it is the responsibility of each applicant to show how a facility being claimed under a PBR meets the general requirements of 30 TAC § 106.4 and also the specific requirements of the PBR being claimed. If all PBR requirements cannot be met, a facility will not be allowed to operate under the PBR and an application for a construction permit may be required under 30 TAC § 116.110(a).

Registration of a facility under a PBR can be performed by completing **Form PI-7** (Registration for Permits by Rule) or **Form PI-7-CERT** (Certification and Registration for Permits by Rule). The appropriate checklist should accompany the registration form. Check the most appropriate answer and include any additional information in the spaces provided. If additional space is needed, please include an extra page and reference the question number. The PBR forms, tables, checklists, and guidance documents are available from the TCEQ, Air Permits Division website at: www.tceq.texas.gov/permitting/air/nav/air_pbr.html.

1. 30 TAC § 106.4(a)(1) and (4): Emission Limits	Answer
List emissions in tpy for each facility (add additional pages or table if needed):	
Are the SO ₂ , PM ₁₀ , VOC, or other air contaminant emissions claimed for each facility in this PBR submittal less than 25 tpy?	☒ YES ☐ NO
Are the NO _x and CO emissions claimed for each facility in this PBR submittal less than 250 tpy?	☒ YES ☐ NO
<i>If the answer to both is "Yes," continue to the question below. If the answer to either question is "No," a PBR cannot be claimed.</i>	
Has any facility at the property had public notice and opportunity for comment under 30 TAC Section 116 for a regular permit or permit renewal? (This does not include public notice for voluntary emission reduction permits, grandfathered existing facility permits, or federal operating permits.)	☐ YES ☒ NO
<i>If "Yes," skip to Section 2. If "No," continue to the questions below.</i>	
If the site has had no public notice, please answer the following:	
Are the SO ₂ , PM ₁₀ , VOC, or other emissions claimed for all facilities in this PBR submittal less than 25 tpy?	☒ YES ☐ NO
Are the NO _x and CO emissions claimed for all facilities in this PBR submittal less than 250 tpy?	☒ YES ☐ NO
<i>If the answer to both questions is "Yes," continue to Section 2.</i>	
<i>If the answer to either question is "No," a PBR cannot be claimed. A permit will be required under Chapter 116.</i>	

Texas Commission on Environmental Quality
Permit by Rule Applicability Checklist
Title 30 Texas Administrative Code § 106.4

2. 30 TAC § 106.4(a)(2): Nonattainment Check	Answer
Are the facilities to be claimed under this PBR located in a designated ozone nonattainment county?	☐ YES ☒ NO
<i>If "Yes," please indicate which county by checking the appropriate box to the right.</i>	
(Moderate) - Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller counties:	☐ HGB
(Moderate) - Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise counties:	☐ DFW
<i>If "Yes," to any of the above, continue to the next question. If "No," continue to Section 3.</i>	
Does this project trigger a nonattainment review?	☐ YES ☐ NO
Is the project's potential to emit (PTE) for emissions of VOC or NO _x increasing by 100 tpy or more?	☐ YES ☐ NO
<i>PTE is the maximum capacity of a stationary source to emit any air pollutant under its worst-case physical and operational design unless limited by a permit, rules, or made federally enforceable by a certification.</i>	
Is the site an existing major nonattainment site and are the emissions of VOC or NO _x increasing by 40 tpy or more?	☐ YES ☐ NO
<i>If needed, attach contemporaneous netting calculations per nonattainment guidance.</i>	
Additional information can be found at: www.tceq.texas.gov/permitting/air/forms/newsource/tables/nsr_table8.html and www.tceq.texas.gov/permitting/air/nav/air_docs_newsource.html	
<i>If "Yes," to any of the above, the project is a major source or a major modification and a PBR may not be used. A Nonattainment Permit review must be completed to authorize this project. If "No," continue to Section 3.</i>	
3. 30 TAC § 106.4(a)(3): Prevention of Significant Deterioration (PSD) check	
Does this project trigger a review under PSD rules?	
To determine the answer, review the information below:	
Are emissions of any regulated criteria pollutant increasing by 100 tpy of any criteria pollutant at a named source?	☐ YES ☒ NO
Are emissions of any criteria pollutant increasing by 250 tpy of any criteria pollutant at an unnamed source?	☐ YES ☒ NO
Are emissions increasing above significance levels at an existing major site?	☐ YES ☒ NO
PSD information can be found at: www.tceq.texas.gov/assets/public/permitting/air/Forms/NewSourceReview/Tables/10173tbl.pdf and www.tceq.texas.gov/permitting/air/nav/air_docs_newsource.html	
<i>If "Yes," to any of the above, a PBR may not be used. A PSD Permit review must be completed to authorize the project.</i>	
<i>If "No," continue to Section 4.</i>	

Texas Commission on Environmental Quality
Permit by Rule Applicability Checklist
Title 30 Texas Administrative Code § 106.4

4. 30 TAC § 106.4(a)(6): Federal Requirements	Answer
Will all facilities under this PBR meet applicable requirements of Title 40 Code of Federal Regulations (40 CFR) Part 60, New Source Performance Standards (NSPS)?	☒ YES ☐ NO ☐ NA
If "Yes," which Subparts are applicable? (<i>answer below.</i>)	
OOOO/a	
Will all facilities under this PBR meet applicable requirements of 40 CFR Part 63, Hazardous Air Pollutants Maximum Achievable Control Technology (MACT) standards?	☐ YES ☐ NO ☒ NA
If "Yes," which Subparts are applicable? (<i>answer below.</i>)	
Will all facilities under this PBR meet applicable requirements of 40 CFR Part 61, National Emissions Standards for Hazardous Air Pollutants (NESHAPs)?	☐ YES ☐ NO ☒ NA
If "Yes," which Subparts are applicable? (<i>answer below.</i>)	
<i>If "Yes" to any of the above, please attach a discussion of how the facilities will meet any applicable standards.</i>	
5. 30 TAC § 106.4(a)(7): PBR prohibition check	
Are there any air permits at the site containing conditions which prohibit or restrict the use of PBRs?	☐ YES ☒ NO
<i>If "Yes," PBRs may not be used or their use must meet the restrictions of the permit. A new permit or permit amendment may be required.</i>	
List permit number(s):	
6. 30 TAC § 106.4(a)(8): NO_x Cap and Trade	
Is the facility located in Harris, Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, or Waller County?	☐ YES ☒ NO
<i>If "Yes," answer the question below.</i>	
<i>If "No," continue to Section 7.</i>	
Will the proposed facility or group of facilities obtain required allowances for NO _x if they are subject to 30 TAC Chapter 101, Subchapter H, Division 3 (relating to the Mass Emissions Cap and Trade Program)?	☐ YES ☐ NO

Texas Commission on Environmental Quality
Permit by Rule Applicability Checklist
Title 30 Texas Administrative Code § 106.4

7. Highly Reactive Volatile Organic Compounds (HRVOC) check		
Is the facility located in Harris County?	☐ YES ☒ NO	
<i>If "Yes," answer the next question. If "No," skip to the box below.</i>		
Will the project be constructed after June 1, 2006?	☐ YES ☐ NO	
<i>If "Yes," answer the next question.</i>		
<i>If "No," skip to the box below.</i>		
Will one or more of the following HRVOC be emitted as a part of this project?	☐ YES ☒ NO	
<i>If "Yes," complete the information below:</i>		
Information	lb/hr	tpy
▶ 1,3-butadiene		
▶ all isomers of butene (e.g., isobutene [2-methylpropene or isobutylene])		
▶ alpha-butylene (ethylethylene)		
▶ beta-butylene (dimethylethylene, including both cis- and trans-isomers)		
▶ ethylene		
▶ propylene		
Is the facility located in Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, or Waller County?	☐ YES ☒ NO	
<i>If "Yes," answer the next question. If "No," the checklist is complete.</i>		
Will the project be constructed after June 1, 2006?	☐ YES ☐ NO	
<i>If "Yes," answer the next question. If "No," the checklist is complete.</i>		
Will one or more of the following HRVOC be emitted as a part of this project?	☐ YES ☐ NO	
<i>If "Yes," complete the information below:</i>		
Information	lb/hr	tpy
▶ ethylene		
▶ propylene		

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EOG RESOURCES, INC.

APRIL 2024

HOFF G&H TELLURIDE PRODUCTION FACILITY

PI-7-CERT Revision of Registration for Permit by Rule §106.4, §106.352, and §106.492

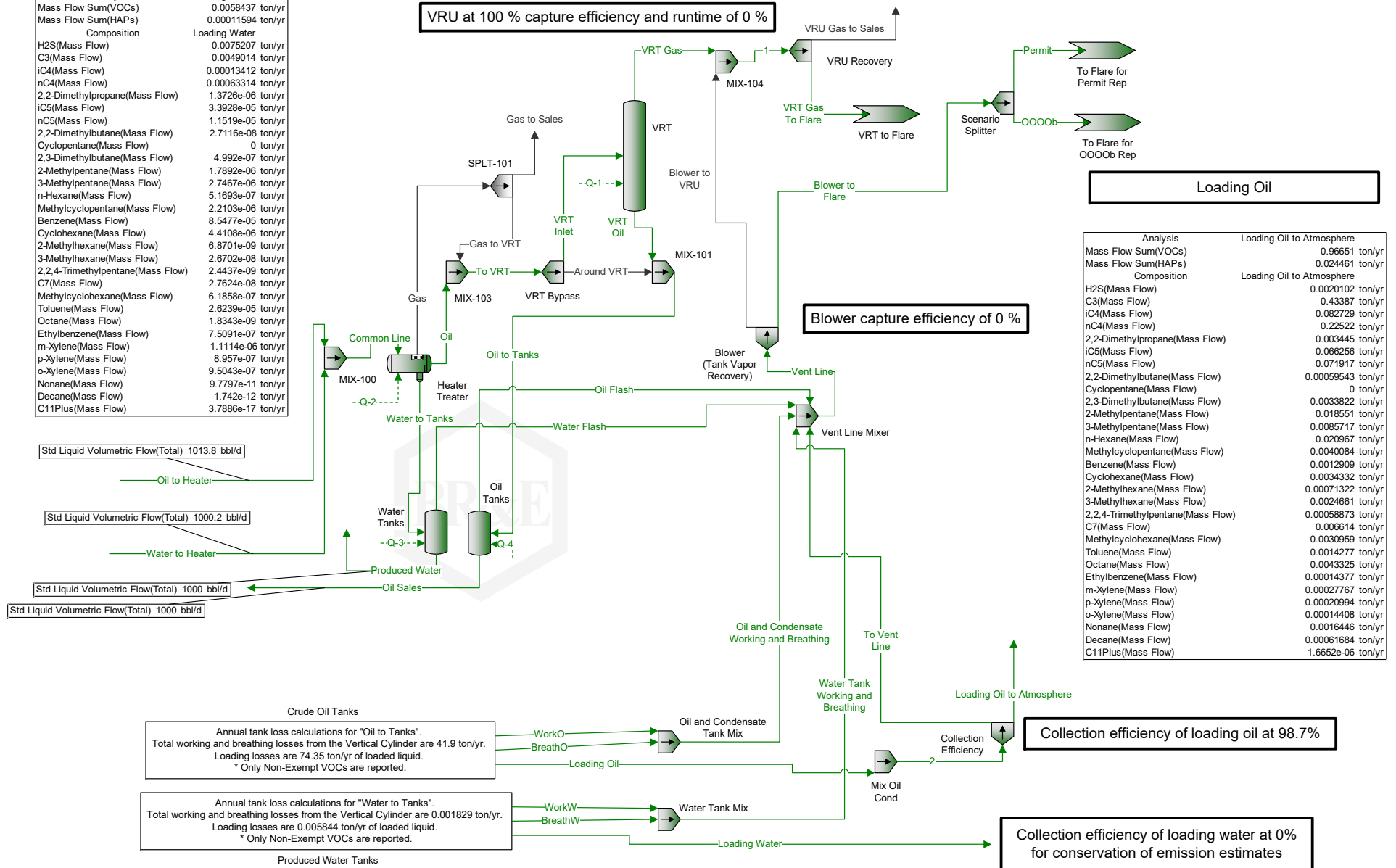
ATTACHMENT IV.C

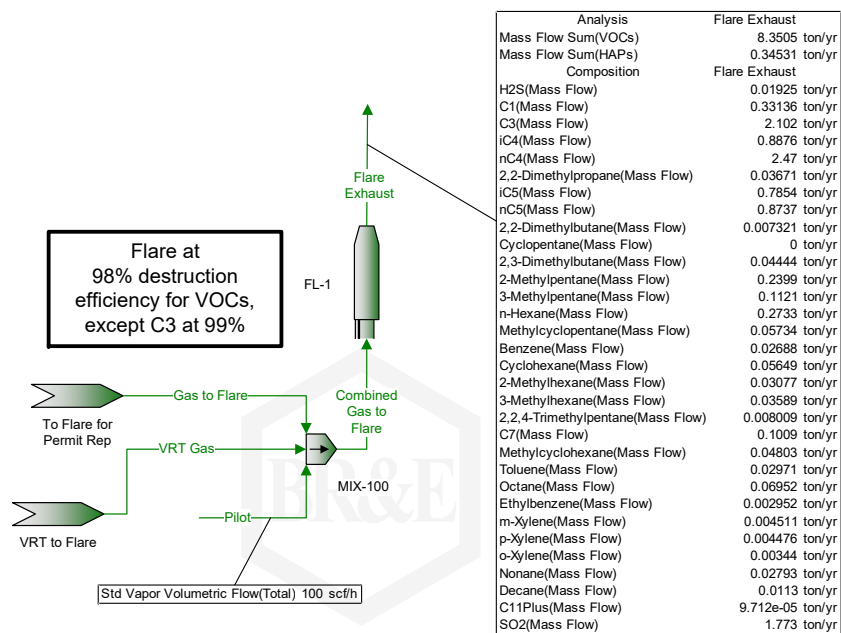
PROCESS FLOW DIAGRAM

Loading Water

Analysis	Loading Water
Mass Flow Sum(VOCs)	0.0058437 ton/yr
Mass Flow Sum(HAPs)	0.00011594 ton/yr
Composition	Loading Water
H2S(Mass Flow)	0.0075207 ton/yr
C3(Mass Flow)	0.0049014 ton/yr
iC4(Mass Flow)	0.00013412 ton/yr
nC4(Mass Flow)	0.00063314 ton/yr
2,2-Dimethylpropane(Mass Flow)	1.3726e-06 ton/yr
iC5(Mass Flow)	3.3928e-05 ton/yr
nC5(Mass Flow)	1.1519e-05 ton/yr
2,2-Dimethylbutane(Mass Flow)	2.7116e-08 ton/yr
Cyclopentane(Mass Flow)	0 ton/yr
2,3-Dimethylbutane(Mass Flow)	4.992e-07 ton/yr
2-Methylpentane(Mass Flow)	1.7892e-06 ton/yr
3-Methylpentane(Mass Flow)	2.7467e-06 ton/yr
n-Hexane(Mass Flow)	5.1693e-07 ton/yr
Methylcyclopentane(Mass Flow)	2.2103e-06 ton/yr
Benzene(Mass Flow)	8.5477e-05 ton/yr
Cyclohexane(Mass Flow)	4.4108e-06 ton/yr
2-Methylhexane(Mass Flow)	6.8701e-09 ton/yr
3-Methylhexane(Mass Flow)	2.6702e-08 ton/yr
2,2,4-Trimethylpentane(Mass Flow)	2.4437e-09 ton/yr
C7(Mass Flow)	2.7624e-08 ton/yr
Methylcyclohexane(Mass Flow)	6.1858e-07 ton/yr
Toluene(Mass Flow)	2.6239e-05 ton/yr
Octane(Mass Flow)	1.8343e-09 ton/yr
Ethylbenzene(Mass Flow)	7.5091e-07 ton/yr
m-Xylene(Mass Flow)	1.1114e-06 ton/yr
p-Xylene(Mass Flow)	8.957e-07 ton/yr
o-Xylene(Mass Flow)	9.5043e-07 ton/yr
Nonane(Mass Flow)	9.7797e-11 ton/yr
Decane(Mass Flow)	1.742e-12 ton/yr
C11Plus(Mass Flow)	3.7886e-17 ton/yr

VRT at 100 % capture efficiency and runtime of 0 %





FL-1 Combustion Criteria Pollutants

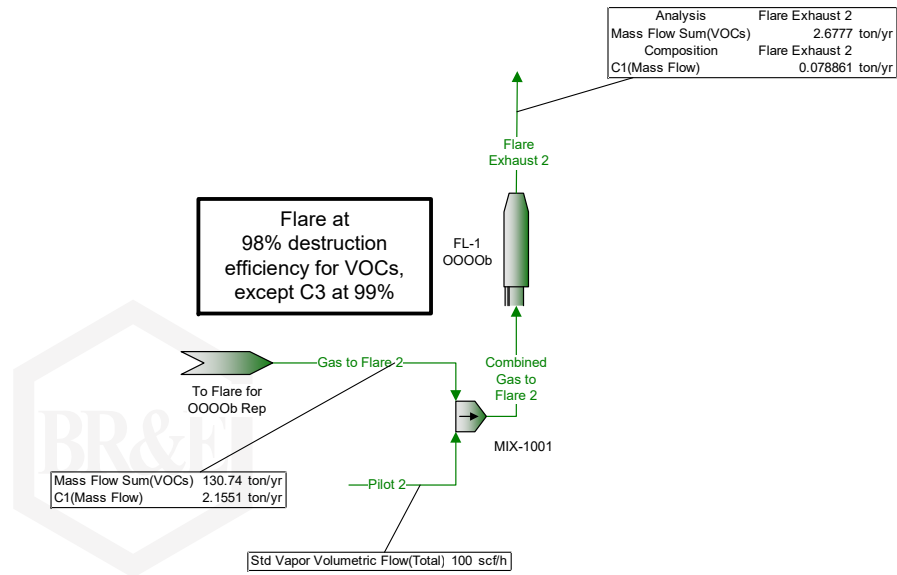
NOx Emissions = 0.439 lb/h

CO Emissions = 1.748 lb/h

FL-1 Heat Release Requirements

Heat Release = 2.926 MMBtu/h

QSO2 = 0.02145 MMBtu/h



ATTACHMENT IV.D

PROCESS DESCRIPTION

The Hoff G&H Telluride Production Facility (the Facility) is a sour oil production facility. The H₂S content of inlet gas is represented at 1000 ppm, although 25 ppm H₂S has been observed in recent analysis. Produced fluids enter the site and flow through production separators and heater treaters to separate the oil, water, and gas. Crude oil is routed to a VRT, where flash gas is captured by a VRU and sent off site for further processing or routed to the flare during periods of downtime. Crude oil is then routed to three 500-bbl crude oil storage tanks and then trucked off site. Water is stored in two 500-bbl produced water tanks and then trucked off site. Emissions from the tank battery are controlled by a TVCS and then sent off site for further processing. The TVCS is designed to isolate and push low pressure tank vapors with a blower into the vapor recovery system. Any remaining emissions from the tank battery will be controlled by a flare (EPN FL-1). Fugitive emissions from valves, connectors, etc. are represented by EPN FUG.

Under this revision, EOG is:

- Removing service on 4 oil storage tanks and 1 produced water storage tank,
- Converting one oil tank to a water tank,
- Revising the control efficiency of the VRU system and adding a blower as part of the tank vapor capture system,
- Adding one heater treater, which may be added in the future,
- Revising production to reflect current conditions at the Facility,
- Adjusting fugitive component estimates and associated emissions, and
- Using BRE ProMax for process simulation to estimate emission rates from the flares (EPN FL-1) and loading operations (EPN LOAD).

OIL AND GAS FACILITY GENERAL INFORMATION			
Natural Gas Throughput (MMSCF/day):	1.00	H ₂ S Content of Inlet Gas:	25 ppm
Oil Throughput (bbl/day):	1000	Is the gas sweet or sour?	Sour
Produced Water Throughput (bbl/day):	1000	Is this site operational/producing?	Yes
TCEQ Form	PI-7-CERT	Has the site been registered before?	Yes

EQUIPMENT/PROCESSES AT SITE						
Number of each:	Compressor Engines:	0	Glycol Dehydrators:	0	VRU:	Yes
	Separators:	Multiple	Amine units:	0	TVCS:	Yes
	Storage Tanks:	3 Oil / 2 Water	Heater Treaters:	2 (+ 1 Future)	Other:	N/A
	Truck Loading:	Yes	Flares:	1	Other:	N/A

ATTACHMENT IV.E

MAXIMUM EMISSIONS DATA AND CALCULATIONS

Flare (EPN FL-1)

There is one flare at the Hoff G&H Telluride Production Facility. The flare controls the vapors from the storage tanks, as well as facility upsets. A 98% destruction efficiency is assumed for the control of volatile organic compounds. Propane is represented at a 99% flare destruction rate. NO_x and CO emission factors are based on the TCEQ Technical Guidance Package for Flares and Vapor Oxidizers, dated October 2000. A scaled map of the Facility is included in [Appendix C](#).

Fugitives (EPN FUG)

Fugitive emissions were estimated based on the TCEQ technical guidance document for "Equipment Fugitive Leaks", dated June 2018. The Oil and Gas Production Operations equipment leak emission factors approved by the TCEQ were used in the emissions estimations. Although the actual fugitive component counts may vary from the representation, actual emissions from fugitives will remain below the certified emission rates.

Heaters [EPN HEATER-1, -2, -3 (Future)]

There are two heater treaters at the Hoff G&H Telluride Production Facility, and an additional one is included for a potential future addition. Emissions from the heaters are estimated based factors from AP-42 Chapter 1.4 for natural gas combustion. The fuel is field gas.

Truck Loading (EPN LOAD)

Oil and produced water are trucked off site. Truck loading emissions were calculated using process simulation in BRE ProMax. Oil loading calculations were based on dedicated vapor balance service of a tank truck with a 98.7% overall reduction efficiency. Water loading calculations were based on dedicated vapor balance service loading of a tank truck with a 0% overall reduction efficiency for conservation of emission estimates. The maximum hourly emission rate is based on loading 180 bbls in one hour. The maximum annual emission rate is based on total daily throughputs. The trucks will be leak-tested trucks.

Storage Tanks (EPN FL-1)

Separated crude oil is first sent to a Vapor Recovery Tower (VRT). Flash gas is controlled from the VRT with a Vapor Recovery Unit (VRU), which sends gas to sales/further processing. Flash gas is routed to the flare during periods of downtime. The flash gas emissions were calculated with a VRU runtime of 0% for conservation of emission estimates. From the VRT, crude oil is sent to the storage tanks. There are three 500-bbl crude oil storage tanks (FIN TK-1, TK-2, and TK-3) and two 500-bbl produced water storage tanks (FIN TK-W1 and TK-W2). BRE ProMax with the latest EPA emission factors (12/2019) were used to calculate emissions from the storage tanks. Maximum throughputs of 1000 bbls crude oil per day and 1000 bbls produced water per day were used to calculate the emissions. The storage tank emissions will be controlled by a tank vapor capture system (TVCS), and any remaining emissions or emissions during downtime of the TVCS will be controlled by the flare (EPN FL-1). For conservation of emission estimates, emission calculations used a TVCS capture efficiency of 0%.

The oil and water analyses were obtained from the Naylor Jones 2 Unit Facility. The oil and water analyses from the Naylor Jones 2 are considered representative of the Hoff G&H Telluride Production Facility because the wells are from the same geologic formation, the facilities are in

proximity, and the process conditions (temperature/pressure of separator) are similar. A representative extended gas analysis was obtained from the nearby Hoff Compressor Station inlet, and site-specific gas analyses were also collected. The results of laboratory analyses of the water and crude oil, along with other supporting analytical data, are included in [Appendix B](#).

A summary of emission points and certified emission rates are provided in the table on the following page. Emission calculations are provided in [Appendix A](#).

EMISSIONS SUMMARY

Source	EPN	VOC		NOx		CO		PM		SO ₂		H ₂ S		HAP	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
Fugitives	FUG	1.56	6.84	--	--	--	--	--	--	--	--	0.00	0.01	0.05	0.22
Flares	FL-1	1.91	8.35	0.44	1.92	1.75	7.66	<0.01	<0.01	0.40	1.77	4.4E-03	1.9E-02	0.08	0.35
Horizontal Heater Treater	HEATER-1	3.2E-03	0.01	0.06	0.25	0.05	0.21	4.4E-03	0.02	1.1E-01	4.7E-01	--	--	4.3E-05	1.9E-04
Horizontal Heater Treater	HEATER-2	3.2E-03	0.01	0.06	0.25	0.05	0.21	4.4E-03	0.02	1.1E-01	4.7E-01	--	--	4.3E-05	1.9E-04
Horizontal Heater Treater (Future)	HEATER-3	3.2E-03	0.01	0.06	0.25	0.05	0.21	4.4E-03	0.02	1.1E-01	4.7E-01	--	--	4.3E-05	1.9E-04
Loading	LOAD	0.95	0.97	--	--	--	--	--	--	--	--	1.86E-01	9.5E-03	0.025	0.02
TOTAL		4.43	16.20	0.61	2.68	1.89	8.29	0.01	0.06	0.73	3.19	0.19	0.04	0.15	0.59

EOG RESOURCES, INC.

APRIL 2024

HOFF G&H TELLURIDE PRODUCTION FACILITY

PI-7-CERT Revision of Registration for Permit by Rule §106.4, §106.352, and §106.492

APPENDIX A

EMISSION CALCULATIONS

EMISSION ESTIMATE FOR FUGITIVES

EPN:

FUG

Operating schedule (hr/yr):

8760

Fugitive Emission Calculations:

Emission Source		Source Count	Uncontrolled Emission Factor* (lb/hr-source)	Control Factor	Hourly Emissions (lb/hr)	Annual Emissions (ton/yr)
Valves:	gas	94	0.00992	0%	0.932	4.08
	water/light oil**	110	0.000216	0%	0.0238	0.10
	light oil	106	0.0055	0%	0.583	2.55
	heavy oil	6	0.0000185	0%	0.000111	0.00
Flanges:	gas	183	0.00086	0%	0.157	0.69
	water/light oil	219	0.000006	0%	0.00131	0.01
	light oil	212	0.000243	0%	0.0515	0.23
	heavy oil	6	0.00000086	0%	0.00000516	0.00
Connectors:	gas	232	0.00044	0%	0.102	0.45
	water/light oil	150	0.000243	0%	0.0365	0.16
	light oil	173	0.000463	0%	0.0801	0.35
	heavy oil	6	0.0000165	0%	0.000099	0.00
Open-ended Lines:	gas	0	0.00441	0%	0	0.00
	water/light oil	0	0.00055	0%	0	0.00
	light oil	0	0.00309	0%	0	0.00
	heavy oil	0	0.000309	0%	0	0.00
Pumps:	light oil	12	0.02866	0%	0.344	1.51
	heavy oil	0	0.00113	0%	0	0.00
Other:	gas	10	0.0194	0%	0.194	0.85
	water/light oil	10	0.0309	0%	0.309	1.35
	light oil	10	0.0165	0%	0.165	0.72
	heavy oil	6	0.0000683	0%	0.00041	0.00

Sample Calculation:

Gas Valve Emissions = (94 valves)(0.00992 lb/hr-source)(1 - 0)
= 0.932 lb/hr

Total Annual Emissions = (2.98 lb/hr)(8760 hr/yr)(1 ton/2000 lb)
= 13.05 tons/yr

* The emission factors are from the TCEQ's 2000 "Equipment Leak Fugitives" for Oil and Gas Production Operations.

** Assuming VOC content 1% of water, water HAP content 5% of VOCs, and H2S content from flash analysis

FUGITIVE EMISSION RATE CALCULATIONS

Gas/Vapor Components

Component	Weight Percent Flash Gas Analysis	Total Emissions [lb/hr]	Total Emissions [ton/yr]
Hydrogen Sulfide	0.100	0.001	0.006
Nitrogen	0.344	0.005	0.021
Carbon Dioxide	3.024	0.042	0.183
Methane	53.432	0.740	3.241
Ethane	18.891	0.262	1.146
Propane	13.315	0.184	0.808
Isobutane	2.246	0.031	0.136
n-Butane	5.746	0.080	0.349
2,2 Dimethylpropane	0.000	0.000	0.000
Isopentane	1.004	0.014	0.061
n-Pentane	1.057	0.015	0.064
2,2 Dimethylbutane	0.000	0.000	0.000
Cyclopentane	0.000	0.000	0.000
2,3 Dimethylbutane	0.000	0.000	0.000
2 Methylpentane	0.000	0.000	0.000
3 Methylpentane	0.000	0.000	0.000
n-Hexane	0.771	0.011	0.047
Methylcyclopentane	0.013	0.000	0.001
Benzene	0.023	0.000	0.001
Cyclohexane	0.012	0.000	0.001
2-Methylhexane	0.000	0.000	0.000
3-Methylhexane	0.000	0.000	0.000
2,2,4 Trimethylpentane	0.000	0.000	0.000
Other C7's	0.046	0.001	0.003
n-Heptane	0.042	0.001	0.003
Methylcyclohexane	0.011	0.000	0.001
Toluene	0.009	0.000	0.001
Other C8's	0.001	0.000	0.000
n-Octane	0.004	0.000	0.000
Ethylbenzene	0.000	0.000	0.000
M & P Xylenes	0.001	0.000	0.000
O-Xylene	0.000	0.000	0.000
Other C9's	0.002	0.000	0.000
n-Nonane	0.001	0.000	0.000
Other C10's	0.001	0.000	0.000
n-Decane	0.001	0.000	0.000
Undecanes (11)	0.000	0.000	0.000
TOTAL	100	1.386	6.072
TOTAL VOC	24.306	0.337	1.474
TOTAL HAPs	0.804	0.011	0.049

Speciation from sample dated 12/1/2021 from the Hoff Compressor Station inlet gas

FUGITIVE EMISSION RATE CALCULATIONS

Light/Heavy Liquid Components

Component	Weight Percent Flash Gas Analysis	Total Emissions [lb/hr]	Total Emissions [ton/yr]
Hydrogen Sulfide	0.100	0.001	0.005
Nitrogen	0.004	0.000	0.000
Carbon Dioxide	0.009	0.000	0.000
Methane	0.031	0.000	0.002
Ethane	0.235	0.003	0.013
Propane	0.999	0.012	0.054
Isobutane	0.430	0.005	0.023
n-Butane	1.612	0.020	0.086
2,2 Dimethylpropane	0.034	0.000	0.002
Isopentane	1.171	0.014	0.063
n-Pentane	1.679	0.021	0.090
2,2 Dimethylbutane	0.022	0.000	0.001
Cyclopentane	0.000	0.000	0.000
2,3 Dimethylbutane	0.168	0.002	0.009
2 Methylpentane	1.020	0.012	0.055
3 Methylpentane	0.524	0.006	0.028
n-Hexane	1.591	0.019	0.085
Methylcyclopentane	0.335	0.004	0.018
Benzene	0.157	0.002	0.008
Cyclohexane	0.402	0.005	0.022
2-Methylhexane	0.404	0.005	0.022
3-Methylhexane	0.452	0.006	0.024
2,2,4 Trimethylpentane	0.134	0.002	0.007
Other C-7's	0.408	0.005	0.022
n-Heptane	1.219	0.015	0.065
Methylcyclohexane	0.756	0.009	0.041
Toluene	0.561	0.007	0.030
Other C-8's	2.172	0.027	0.116
n-Octane	1.213	0.015	0.065
E-Benzene	0.159	0.002	0.009
M & P Xylenes	0.519	0.006	0.028
O-Xylene	0.237	0.003	0.013
Other C-9's	2.958	0.036	0.159
n-Nonane	1.102	0.013	0.059
Other C-10's	3.716	0.045	0.199
n-decane	1.078	0.013	0.058
Undecanes(11)	4.161	0.051	0.223
Dodecanes(12)	3.555	0.044	0.191
Tridecanes(13)	3.817	0.047	0.205
Tetradecanes(14)	3.554	0.044	0.191
Pentadecanes(15)	3.269	0.040	0.175
Hexadecanes(16)	2.870	0.035	0.154
Heptadecanes(17)	2.764	0.034	0.148
Octadecanes(18)	2.740	0.034	0.147
Nonadecanes(19)	2.855	0.035	0.153
Eicosanes(20)	2.462	0.030	0.132
Heneicosanes(21)	2.224	0.027	0.119
Docosanes(22)	2.130	0.026	0.114
Tricosanes(23)	1.941	0.024	0.104
Tetracosanes(24)	1.812	0.022	0.097
Pentacosanes(25)	1.731	0.021	0.093
Hexacosanes(26)	1.641	0.020	0.088
Heptacosanes(27)	1.581	0.019	0.085
Octacosanes(28)	1.489	0.018	0.080
Nonacosanes(29)	1.350	0.017	0.072
triacontanes(30)	1.262	0.015	0.068
Hentriacontanes Plus(31+)	23.275	0.285	1.248
TOTAL	100	1.225	5.367
TOTAL VOC	99.721	1.221	5.347
TOTAL HAPs	3.223	0.039	0.173

Speciation from sample dated 12/1/2021 from the Naylor Jones 2 Facility

EMISSION ESTIMATE FOR HEATER OPERATIONS**Heater Treaters****EPN HEATER-1, -2, and -3 (Future)**

Firing Rate: 0.75 MM Btu/hr
 Hours of Operation: 8760 hr/yr
 Assumptions: 1,305 Btu/scf

Pollutant	EMISSION FACTORS	EMISSION FACTOR UNITS	EMISSIONS	
			(lb/hr)	(tpy)
NOx ¹	100	lb/MMscf	0.0575	0.252
CO ¹	84	lb/MMscf	0.0483	0.211
SO2 ²	188	lb/MMscf	0.1080	0.473
TOC ²	11	lb/MMscf	0.0063	0.028
VOC ²	5.5	lb/MMscf	0.0032	0.014
HAP ³	0.075	lb/MMscf	0.00004	0.0002
PM10 ⁴	7.6	lb/MMscf	0.0044	0.019

¹Factors obtained from Table 1.4-1 of AP-42 dated 7/98 for small, uncontrolled boilers.

²Factors based on Table 1.4-2 of AP-42 dated 7/98.

³Factor for formaldehyde from Table 1.4-3 of AP-42 dated 7/98.

⁴PM10 factor is the summation of the condensable and filterable particulate emission factors given in Table 1.4-2 of AP-42 dated 7/98.

Site-specific sulfur content: = 626285 grains/MMscf

$$\frac{(100 \text{ lb NOx/MM scf gas})(0.75 \text{ MMBtu/hr})}{(1304.75 \text{ Btu/scf})} = 0.0575 \text{ lb NOx/hr}$$

EMISSION ESTIMATE FOR LOADING OIL
Loading Parameters From BRE ProMax

Number of Oil Tanks: 3

Crude Oil Tanks

Working and Breathing Parameters

Floating Roof Fittings

Loading Loss Parameters

Results

Working and Breathing Report

Loading F

Property	Value	Units
Cargo Carrier	Tank Truck or Rail Tank Car	
Land Based Mode of Operation	Submerged Loading: Dedicated Vapor Balance	
Marine Based Mode of Operation	Submerged Loading: Ships	
Overall Reduction Efficiency	0	%
Maximum Hourly Loading Rate	4,320	bbl/d

Edit Source ...

EMISSION ESTIMATE FOR LOADING WATER

Loading Report From BRE ProMax

Number of Water Tanks: 2

Produced Water Tanks

Working and Breathing Parameters

Floating Roof Fittings

Loading Loss Parameters

Results

Working and Breathing Report

Loading Report

Property	Value	Units
Cargo Carrier	Tank Truck or Rail Tank Car	
Land Based Mode of Operation	Submerged Loading: Dedicated Vapor Balance Se	
Marine Based Mode of Operation	Submerged Loading: Ships	
Overall Reduction Efficiency	0	%
Maximum Hourly Loading Rate	4,320	bbbl/d

Edit Source ...

EOG RESOURCES, INC.

APRIL 2024

HOFF G&H TELLURIDE PRODUCTION FACILITY

PI-7-CERT Revision of Registration for Permit by Rule §106.4, §106.352, and §106.492

APPENDIX B

ANALYTICAL DATA

January 3, 2022

FESCO, Ltd.
1100 FESCO Avenue - Alice, Texas 78332

For: EOG Resources, Inc.
P. O. Box 592929
San Antonio, Texas 78259

Sample: Naylor Jones Unit 2
Heater Treater Hydrocarbon Liquid
Sampled @ 57 psig & 160 °F

Date Sampled: 12/01/2021

Job Number: 213203.002

CHROMATOGRAPH EXTENDED ANALYSIS - GPA 2186-M

COMPONENT	MOL %	LIQ VOL %	WT %
Nitrogen	0.026	0.004	0.004
Carbon Dioxide	0.037	0.009	0.009
Methane	0.350	0.084	0.031
Ethane	1.405	0.532	0.235
Propane	4.073	1.588	0.999
Isobutane	1.329	0.616	0.430
n-Butane	4.989	2.226	1.612
2,2 Dimethylpropane	0.085	0.046	0.034
Isopentane	2.920	1.511	1.171
n-Pentane	4.185	2.147	1.679
2,2 Dimethylbutane	0.046	0.027	0.022
Cyclopentane	0.000	0.000	0.000
2,3 Dimethylbutane	0.350	0.203	0.168
2 Methylpentane	2.128	1.250	1.020
3 Methylpentane	1.093	0.632	0.524
n-Hexane	3.320	1.932	1.591
Heptanes Plus	<u>73.663</u>	<u>87.195</u>	<u>90.471</u>
Totals:	100.000	100.000	100.000

Characteristics of Heptanes Plus:

Specific Gravity -----	0.8367	(Water=1)
°API Gravity -----	37.62	@ 60°F
Molecular Weight -----	220.9	
Vapor Volume -----	12.02	CF/Gal
Weight -----	6.97	Lbs/Gal

Characteristics of Total Sample:

Specific Gravity -----	0.8064	(Water=1)
°API Gravity -----	43.97	@ 60°F
Molecular Weight -----	179.8	
Vapor Volume -----	14.23	CF/Gal
Weight -----	6.72	Lbs/Gal

Base Conditions: 14.650 PSI & 60 °F

Certified: FESCO, Ltd. - Alice, Texas

Sampled By: (16) R. Elizondo
Analyst: JL
Processor: ANBdjv
Cylinder ID: W-1256

Conan Pierce 361-661-7015

TANKS DATA INPUT REPORT - GPA 2186-M

COMPONENT	Mol %	LiqVol %	Wt %
Carbon Dioxide	0.037	0.009	0.009
Nitrogen	0.026	0.004	0.004
Methane	0.350	0.084	0.031
Ethane	1.405	0.532	0.235
Propane	4.073	1.588	0.999
Isobutane	1.329	0.616	0.430
n-Butane	5.074	2.272	1.646
Isopentane	2.920	1.511	1.171
n-Pentane	4.185	2.147	1.679
Other C-6's	3.617	2.112	1.733
Heptanes	6.040	3.667	3.221
Octanes	6.838	4.551	4.141
Nonanes	5.760	4.390	4.060
Decanes Plus	51.809	72.924	77.282
Benzene	0.361	0.143	0.157
Toluene	1.095	0.519	0.561
E-Benzene	0.269	0.147	0.159
Xylenes	1.280	0.699	0.756
n-Hexane	3.320	1.932	1.591
2,2,4 Trimethylpentane	<u>0.211</u>	<u>0.156</u>	<u>0.134</u>
Totals:	100.000	100.000	100.000

Characteristics of Total Sample:

Specific Gravity -----	0.8064 (Water=1)
°API Gravity -----	43.97 @ 60°F
Molecular Weight-----	179.8
Vapor Volume -----	14.23 CF/Gal
Weight -----	6.72 Lbs/Gal

Characteristics of Decanes (C10) Plus:

Specific Gravity -----	0.8546 (Water=1)
Molecular Weight-----	268.3

Characteristics of Atmospheric Sample:

°API Gravity -----	42.65 @ 60°F
Reid Vapor Pressure Equivalent (D-6377)-----	10.60 psi

QUALITY CONTROL CHECK		
	Sampling Conditions	Test Samples
Cylinder Number	-----	W-1256* -----
Pressure, PSIG	57	57 -----
Skin Temperature, °F	160	160 -----

* Sample used for analysis

TOTAL EXTENDED REPORT - GPA 2186-M

COMPONENT	Mol %	LiqVol %	Wt %
Nitrogen	0.026	0.004	0.004
Carbon Dioxide	0.037	0.009	0.009
Methane	0.350	0.084	0.031
Ethane	1.405	0.532	0.235
Propane	4.073	1.588	0.999
Isobutane	1.329	0.616	0.430
n-Butane	4.989	2.226	1.612
2,2 Dimethylpropane	0.085	0.046	0.034
Isopentane	2.920	1.511	1.171
n-Pentane	4.185	2.147	1.679
2,2 Dimethylbutane	0.046	0.027	0.022
Cyclopentane	0.000	0.000	0.000
2,3 Dimethylbutane	0.350	0.203	0.168
2 Methylpentane	2.128	1.250	1.020
3 Methylpentane	1.093	0.632	0.524
n-Hexane	3.320	1.932	1.591
Methylcyclopentane	0.717	0.359	0.335
Benzene	0.361	0.143	0.157
Cyclohexane	0.859	0.414	0.402
2-Methylhexane	0.726	0.477	0.404
3-Methylhexane	0.811	0.527	0.452
2,2,4 Trimethylpentane	0.211	0.156	0.134
Other C-7's	0.740	0.461	0.408
n-Heptane	2.188	1.428	1.219
Methylcyclohexane	1.384	0.787	0.756
Toluene	1.095	0.519	0.561
Other C-8's	3.544	2.379	2.172
n-Octane	1.910	1.385	1.213
E-Benzene	0.269	0.147	0.159
M & P Xylenes	0.879	0.482	0.519
O-Xylene	0.402	0.216	0.237
Other C-9's	4.214	3.159	2.958
n-Nonane	1.546	1.231	1.102
Other C-10's	4.730	3.897	3.716
n-decane	1.363	1.184	1.078
Undecanes(11)	5.090	4.303	4.161
Dodecanes(12)	3.971	3.626	3.555
Tridecanes(13)	3.922	3.840	3.817
Tetradecanes(14)	3.364	3.528	3.554
Pentadecanes(15)	2.853	3.206	3.269
Hexadecanes(16)	2.325	2.791	2.870
Heptadecanes(17)	2.097	2.663	2.764
Octadecanes(18)	1.963	2.624	2.740
Nonadecanes(19)	1.952	2.719	2.855
Eicosanes(20)	1.610	2.331	2.462
Heneicosanes(21)	1.374	2.093	2.224
Docosanes(22)	1.256	1.993	2.130
Tricosanes(23)	1.098	1.806	1.941
Tetracosanes(24)	0.985	1.679	1.812
Pentacosanes(25)	0.902	1.596	1.731
Hexacosanes(26)	0.822	1.507	1.641
Heptacosanes(27)	0.760	1.445	1.581
Octacosanes(28)	0.690	1.356	1.489
Nonacosanes(29)	0.604	1.225	1.350
Triacosanes(30)	0.546	1.142	1.262
Hentriacontanes Plus(31+)	<u>7.528</u>	<u>20.370</u>	<u>23.275</u>
Total	100.000	100.000	100.000

January 3, 2022

FESCO, Ltd.
1100 Fesco Avenue - Alice, Texas 78332

For: EOG Resources, Inc.
P. O. Box 592929
San Antonio, Texas 78259

Date Sampled: 12/01/21

Date Analyzed: 12/07/21

Sample: Naylor Jones Unit 2

Job Number: J213203

FLASH LIBERATION OF HYDROCARBON LIQUID		
	Heater Treater HC Liquid	Stock Tank
Pressure, psig	57	0
Skin Temperature, °F	160	70
Gas Oil Ratio (1)	-----	18.5
Gas Specific Gravity (2)	-----	1.617
Separator Volume Factor (3)	1.0445	1.000

STOCK TANK FLUID PROPERTIES	
Shrinkage Recovery Factor (4)	0.9574
Oil API Gravity at 60 °F	42.65
Reid Vapor Pressure Equivalent (D-6377), psi (5)	10.60

Quality Control Check			
	Sampling Conditions	Test Samples	
Cylinder No.	-----	W-1256*	-----
Pressure, psig	57	57	-----
Temperature, °F	160	160	-----

(1) - Scf of flashed vapor per barrel of stock tank oil

(2) - Air = 1.000

(3) - Separator volume / Stock tank volume

(4) - Fraction of first stage separator liquid

(5) - Absolute pressure at 100 deg F

Analyst: R.E.

* Sample used for flash study

Base Conditions: 14.65 PSI & 60 °F

Certified: FESCO, Ltd. - Alice, Texas

Conan Pierce 361-661-7015

January 3, 2022

FESCO, Ltd.
1100 Fesco Avenue - Alice, Texas 78332

For: EOG Resources, Inc.
P. O. Box 592929
San Antonio, Texas 78259

Date Sampled: 12/01/21

Date Analyzed: 12/11/21

Job Number: J213203

Sample: Naylor Jones Unit 2

FLASH LIBERATION OF SEPARATOR WATER		
	Heater Treater	Stock Tank
Pressure, psig	57	0
Skin Temperature	160	70
Gas Water Ratio (1)	-----	0.63
Gas Specific Gravity (2)	-----	0.965

(1) - Scf of water saturated vapor per barrel of stock tank water

(2) - Air = 1.000

(3) - Separator volume / Stock tank volume

Analyst: A.A.

Piston No.: PW-37732

Base Conditions: 14.65 PSI & 60 °F

Certified: FESCO, Ltd. - Alice, Texas

Conan Pierce 361-661-7015



NG Extended Analysis Report_C11+

PRODUCER	EOG
----------	-----

Serial Number::	EOG_NG Ext_1201_003	Station Name::	Hoff Comp Inlet 1
Station Number::	1004001F20	Station Location::	Area 6
Sample Point::	Downstream	Cylinder Number::	SMS-S836
Sampled Date::	12/01/2021	Sampled By::	David Phillips
Sample Contents::	NG Spot	Sample Conditions::	88 psig @ 71 degF

Components (60°F)

Name	Qty (Norm) [Mol %]	Wt Percent (%)	GPM
nitrogen	0.272021	0.344	0.00000
methane	73.708339	53.432	0.00000
carbon dioxide	1.520782	3.024	0.00000
ethane	13.903543	18.891	3.70837
propane	6.682583	13.315	1.83626
i-butane	0.855202	2.246	0.27910
n-butane	2.187701	5.746	0.68791
i-pentane	0.308070	1.004	0.11239
n-pentane	0.324344	1.057	0.11725
n-hexane	0.067773	0.264	0.02780
n-heptane	0.009373	0.042	0.00431
n-octane	0.000824	0.004	0.00042
benzene	0.006592	0.023	0.00184
methylcyclohexane	0.002472	0.011	0.00099
methylcyclopentane	0.003296	0.013	0.00116
cyclohexane	0.003193	0.012	0.00108
toluene	0.002266	0.009	0.00076
ethylbenzene	0.000103	0.000	0.00004
m,p-xylene	0.000206	0.001	0.00008
o-xylene	0.000000	0.000	0.00000
n-nonane	0.000206	0.001	0.00012
n-decane	0.000103	0.001	0.00006
C6	0.130191	0.507	0.05340
C7	0.010094	0.046	0.00464
C8	0.000206	0.001	0.00011
C9	0.000412	0.002	0.00023
C10	0.000103	0.001	0.00006



NG Extended Analysis Report_C11+

PRODUCER

EOG

Name	Qty (Norm) [Mol %]	Wt Percent (%)	GPM
C11+	0.000000	0.000	0.00000
	100.000000	100.000	6.83838

Calculations (14.65)

Component MW Total :	22.13	Relative Density (Water = 1.0) Total :	0.342
Compressibility (Z) (Dry Gas) :	0.99693	Heating Value (Dry Ideal) Total BTU:	1294.547
Heating Value (Dry Real) Total BTU:	1294.465	Heating Value (Sat Ideal) Total BTU:	1271.95727
Heating Value (Sat Real) Total BTU:	1271.74160	:	

Approved: Randy Lunceford

Date: 12/21/2021



Scott Measurement Services Inc.
Gas Lab
19942 FM 2252 Building #1
Garden Ridge, TX 78266
210-599-7600
www.scottmeasurement.com

Producer: EOG
Station Name: Hoff H-G-A-Telluride Fac Check
Station Number: 1457000F06
Sample Date: 08-21-23
Sample Contents: NG Spot
Sample Pressure: 134 Psig
Sample Temp: 103 degF
H2S: 25
First Flow: No

Analysis Date: 8/28/2023 5:01:09 PM
Serial Number: GC4R_58003
Area: 6
Source: Meter Tube
Cylinder Number: SMS-S707
Sampled By: R. Pitts
Lab Technician: Gabriel Gonzales
GPA Method: GPA 2261-19
Resample: No
Received Date: 08-24-23

Index	Name	Normalized [Mole%]	Wt%	GPM
1	C6+	0.5445	2.2464	0.2342
2	Nitrogen	0.2990	0.3756	0.0000
3	Methane	73.3141	52.7396	0.0000
4	Carbon Dioxide	1.5239	3.0075	0.0000
5	Ethane	14.3566	19.3581	3.8317
6	Propane	6.6608	13.1709	1.8314
7	i-Butane	0.8236	2.1467	0.2690
8	n-Butane	1.6854	4.3927	0.5306
9	i-Pentane	0.3893	1.2596	0.1423
10	n-Pentane	0.4028	1.3031	0.1457
Total		100.0000	100.0000	6.9848

Calculated Molecular Weight 22.300
Relative Density Real Gas 0.77301
Compressibility Factor 0.99597

C2+ GPM 6.9848
C3+ GPM 3.1531
C5+ GPM 0.5221

Calculated Gross BTU @ 14.65 psia & 60 degF

Real Gas Dry BTU 1304.75

Water Sat. Gas Base BTU 1282.02

Approved: G. Gonzales

Date: 8/28/2023

Comments: _

EOG RESOURCES, INC.

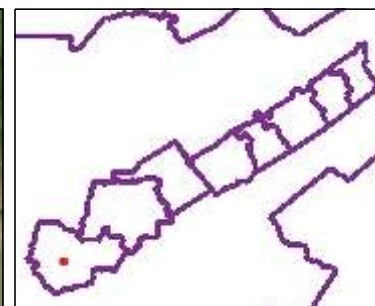
APRIL 2024

HOFF G&H TELLURIDE PRODUCTION FACILITY

PI-7-CERT Revision of Registration for Permit by Rule §106.4, §106.352, and §106.492

APPENDIX C

AREA MAP



Legend

-  As Built Facilities
-  Proposed Facilities
-  As Built Hubs
-  Sales
-  As Built Oil Terminals
-  Compressor Stations
-  Inactive Facilities
-  Bing Maps Imagery
-  Citations



1,119.7 0 559.86 1,119.7Feet

1: 6,718

Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

Date: 11/28/2023

.25 mile radius

Author: