

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

GENERAL OPERATING PERMIT (GOP) REVISION

GOP Type:	514	Company:	ConocoPhillips Company
Permit #:	O4331	Site:	Mockingbird Central Facility
Project #:	36244	Application Area:	Mockingbird Central Facility
Regulated Entity #:	RN109796672	Customer #:	CN601674351
Region:	6	County:	Culberson
NAICS Code:	211111	NAICS Name:	Crude Petroleum and Natural Gas Extraction
Permit Reviewer:	Monica Cates		

SITE INFORMATION

Physical Location: Orla drive NW on us HWY 285 toward RM 652E for 8.3 miles to left turn go 2.7 miles to left then 0.2 mi turn left then 0.3 turn right then 1.5 miles turn right then 3 miles to site on right

Nearest City: Orla

Major Pollutants: CO, NOX, VOC

Additional FOPs: None

PROJECT SUMMARY

ConocoPhillips Company - Mockingbird Central Facility is a crude petroleum and natural gas extraction plant and a major source of emissions. FOP O4331 which was initially issued on November 1, 2021, and was last revised on May 26, 2023. ConocoPhillips submitted a revision application to incorporate the latest issuance of non-rule standard permit registration number 146940 which was issued on January 23, 2024. Requirements for one new engine (Unit ID 912) were added.

PROCESS DESCRIPTION

ConocoPhillips owns and operates the Mockingbird Central Facility, which gathers crude oil, produced water and natural gas from producing wells. Oil from the inlet separators is routed to three (3) oil stabilizers (Unit IDs: STAB1 – STAB3), then to four oil storage tanks (Unit IDs: OT1 - OT4). Storage tank vapors are controlled by two redundant Vapor Recovery Units (Unit IDs: VRU1/VRU2) and two redundant low pressure flares (Unit IDs: LPF1/LPF2). Gas from the inlet separator and stabilizer heaters is routed to a line heater (Unit IDs: LH1) before dumping into a gas scrubber (Unit ID: OHGS). The gas from the overhead scrubber is sent to a set of redundant overhead compressor engines (Unit IDs: 710, 715) and then to the inlet of the site. An off-spec oil tank (Unit ID: OT5) for any oil directed to storage that has not been stabilized as well scrubber drain liquids. OT5 is controlled by the VRUs and low pressure flares. Liquids in the off-spec tank are then recycled into the oil stabilizers.

Produced water from the wells is routed to a degass vessel (Unit ID: SDG), where flash occurs. The water is then routed into three (3) gunbarrel tanks (Unit IDs: GB1 - GB3), then to eight (8) produced water storage tanks (Unit IDs: WT1 - WT8). Any condensate from the gunbarrel tanks is sent to two (2) condensate tanks (Unit IDs: ST1 - ST2). The vapors from all of the equipment are routed to the VRUs and low pressure flares for recovery and/or destruction.

Gas from producing wells is routed to three (3) slug catchers and then to eleven (11) sales gas compressors (Unit IDs: 901-911). Gas is further dehydrated through four (4) glycol dehydrators. The four (4) glycol reboiler burners (Unit IDs: DEHYRB1 – DEHYRB4), in addition to controlling each still vent BTEX condenser (Unit IDs: COND1 - COND4) and flash tank (Unit IDs: DEHYVNT1 – DEHYVNT4), also have their respective combustion emissions based on burner rating. Slug catcher, compressor, and dehydrator scrubber drains are routed to the line heater (Unit ID: LH1), degas vessel (Unit ID: OHGS), and off-spec tank (Unit ID: OT5) mentioned above.

As Alternate Operating Scenarios (AOS), some high pressure inlet gas at the site (Unit ID: HPG) can be routed directly to the high pressure flare (Unit ID: HPF) during sales compressor downtime throughout the year (Unit IDs: 901-911). Also, during overhead compressor downtime (Unit IDs: 710, 715), the gas from the inlet oil separators and the oil stabilizer overheads is routed to the high pressure flare (Unit IDs: HPF) for destruction. A process flow diagram for the facility is provided following this page.

Additional emissions from the site include fugitives (Unit ID: FUG), maintenance, startup and shutdown activities (Unit IDs: MSS and HPF).

TECHNICAL REVIEW

Application/Project Summary

1. Were any of the GOP index Nos. submitted in this application revised or updated?..... No

- 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
8. Were any existing GOP Index Nos. revised or updated? No
9. Did this project incorporate a revised GOP? No

Permit reviewer notes:

The revision application consisted of updating the latest issuance for the non-rule standard permit registration number 146940 which was issued on January 23, 2024, and adding a new engine (unit ID 912) with requirements for 40 CFR Part 63, Subpart ZZZZ and 40 CFR Part 60, Subpart JJJJ. The minor revision application consisted of the following forms: OP-1, OP-2, OP-SUMR, and OP-UA2. The application was certified and submitted through STEERS. An Introduction email was sent to the applicant on April 19, 2024.

A RFI email was sent to the applicant on May 6, 2024 requesting an updated OP-REQ1 page 87 with the latest issuance of the NRSP #146940 since this form was not included in the revision application. The updated form was provided on May 6, 2024. On May 13, 2024, the final OP-CRO1 certifying all the application updates was received.

Delinquent Fee Check

1. The delinquent fee check was performed on January 26, 2024.
2. Were there any delinquent fees owed? No

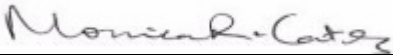
Permit reviewer notes:

A delinquent fee check was completed by APIRT on January 26, 2024. There were no delinquent fees for the company.

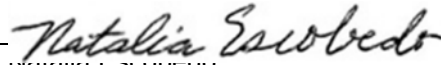
IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	01/23/2024	
Date Project Received by Engineer	03/11/2024	
Technical Review Period	04/18/2024	05/13/2024

EFFECTIVE PERMIT ISSUANCE DATE: June 14, 2024


 Monica Cates
 Permit Reviewer
 Operating Permits Section
 Air Permits Division

05/13/2024
 Date


 Natalia Escobedo
 Team Leader
 Operating Permits Section
 Air Permit Division

06/05/2024
 Date

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Permit Consultant:

There is no Permit Consultant