

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

GENERAL OPERATING PERMIT (GOP) INITIAL ISSUANCE

GOP Type:	514	Company:	Marathon Oil EF LLC
Permit #:	04625	Site:	East 74 Ranch Central Facility
Project #:	36399	Application Area:	East 74 Ranch Central Facility
Regulated Entity #:	RN111488862	Customer #:	CN603988692
Region:	13	County:	Atascosa
NAICS Code:	211120	NAICS Name:	CRUDE PETROLEUM EXTRACTION
Permit Reviewer:	Gabriela Chio		

SITE INFORMATION

Physical Location: From Campbellton at HWY 281 and FM 791 take FM 791 to the west for 1.9 miles to lease road entrance on the left facility entrance is to the immediate right.

Nearest City: Campbellton

Major Pollutants: VOC

Additional FOPs: None

PROJECT SUMMARY

Marathon Oil EF LLC submitted an initial issuance abbreviated application on 03/04/2024 for East 74 Ranch Central Facility. A full application was submitted on 06/13/2024. The full application was submitted past the standard timeframe for submittal because emission calculations were being conducted to identify whether the site is a major source of emissions and required to obtain a Federal Operating Permit (FOP). All required forms were submitted to complete this initial issuance.

PROCESS DESCRIPTION

The 74 East Ranch Facility processes a maximum of 50 million standard cubic feet per day (MMscfd) and 18,250 MMscf/year of natural gas, 30,000 barrels per day and 10,950,000 barrels per year of oil, and 25,000 barrels per day and 9,125,000 barrels per year of produced water. Production from the wells enters the site through separators.

The incoming streams are routed through low pressure (LP) or high pressure (HP) separators, where the gas is separated from the fluids. The separated gas is then compressed (EPNs ENG-1 through ENG-5) and routed to the Ultrafab for gas sweetening and then to glycol dehydrator (FIN DHY-1). Liquids from the separators are sent to the heater treaters (EPNs HTR-1, HTR-2, HTR-4). Condensate from the heater treaters is sent to the vapor recovery towers, then to condensate storage tanks (FINsCTK-1 through CTK-20). Condensate from the storage tanks is transported offsite primarily by pipeline, with truck loading as a contingency plan in case of pipeline failure (EPN CLD-1). Condensate loading is controlled by LP flare.

Produced water from the heater treater is first sent to a gunbarrel tank (FIN GTK-1) to remove any excess condensate, then to the produced water storage tanks (FINs WTK-1 – WTK 12). Produced water from the storage tanks is transported off-site by pipeline, with truck loading as a contingency plan (EPN WLD-1). Produced water loading is uncontrolled. Liquid drip from the compressors and condensate from the gunbarrel tank is sent to the slop oil tank (FIN SLTK-1). Gas may be sweetened using an Ultrafab unit, which uses a liquid scavenger to chemically bind to H₂S and remove it from the gas stream. The Ultrafab spent chemical is sent to the spent chemical tank (FIN SCK-1) and hauled off-site as waste.

Under normal operation, vapors from the vapor recovery towers are routed to the VRU with 100% capture. During normal operation, vapors from the produced water, gunbarrel, slop oil, spent chemical, and condensate storage tanks are routed to the VRU with 99% capture efficiency. During VRU downtime, sources venting to VRU are routed to the LP flare (EPN FL-2) for backup control.

Additional operations at the 74 East Ranch include associated piping components that generate fugitive emissions (EPN FUG-1) and maintenance, startup, and shutdown (MSS) operations. A line heater (EPN HTR-3) will be used as needed to promote flow and prevent issues associated with cold temperatures.

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:

- Forms OP-ACPS, OP-DEL, OP-CRO1, OP-1, OP-REQ1, OP-SUM, OP-UA2, OP-UA3, OP-UA4, OP-UA7, OP-UA12, and OP-UA62 were submitted by the applicant to accomplish this initial issuance.
- The full application was missing required documents and had errors. The following items were requested from the applicant:
 - o Cover Letter, Area Map, Plot Plan, Process Description, Process Flow Diagram, OP-1
 - o Updated OP-UA3, Table 3, with corrected GOP Index Numbers for units in group WTK-GRP and units SCTL-1, GTK-1, and SLTK-1.
 - o Verification that unit CTK 1 is part of the unit group CTK-GRP and an updated OP-SUM with the 'Group ID No.', CTK-GRP, included for CTK-1.
 - o Verification that units in OP-UA3, Tables 25a and 25b for NSPS OOOO were constructed/modified/reconstructed after August 23, 2011 and on or before September 18, 2015.
- All errors were resolved once requested items were received. IMS was updated accordingly.
- GOP Index Numbers for units in group WTK-GRP and unit SCTL-1 in OP-UA3, Table 3, were updated from 511-07-001 to 511-07-019. In the applicant's updated OP-UA3, the index numbers for units GTK-1 and SLTK-1 were mistakenly updated to 511-07-019 as well, so they submitted another updated OP-UA3 to update the index number back to the previously valid one, 511-07-001.
- The site has one NSR standard permit, registration no. 168852 and no PBRs.

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on April 2, 2024
 Site rating: Unclassified Company rating: 0.66 / Satisfactory
 (High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
2. If the compliance history is unsatisfactory, is the authorization renewal period less than 5 years?..... No
3. If the compliance history is unsatisfactory, is the permit recommended to be denied?..... No
4. Was an OP-ACPS submitted and are all units in compliance?..... Yes


Delinquent Fee Check

1. The delinquent fee check was performed on 06/17/2024
2. Were there any delinquent fees owed? No


IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	03/04/2024	
Date Project Received by Engineer	03/28/2024	
Technical Review Period	06/14/2024	06/21/2024

EFFECTIVE PERMIT ISSUANCE DATE: July 1, 2024



 Date
 Gabriela Chio
 Permit Reviewer
 Operating Permits Section
 Air Permits Division



 Date
 Natalia Escobedo
 Team Leader
 Operating Permits Section
 Air Permit Division

CONTACT INFORMATION

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