April 10, 2025

VIA STEERS

To: Texas Commission on Environmental Quality

Re: MMGL TXPH, LLC CN606186393 RN105025076 Permit # 79757 APD-CERT Submittal Zybach 26 Central Tank Battery

Dear Air Permits Initial Review Team:

MMGL TXPH, LLC (MMGL) is submitting this APD-CERT for the Zybach 26 Central Tank Battery (Facility). This APD-CERT is being submitted to certify normal operation Facility emissions which have been updated to reflect current Facility operations. Maintenance, start-up, and shutdown emissions are being claimed under 30 TAC §106.359 and are not being certified with this submittal.

If you have any questions concerning the submittal or wish to discuss the information provided with this letter, please contact Ms. Liz Barksdale, Senior Environmental Analyst, at (972) 628-1480.

Sincerely, MMGL TXHP, LLC MMGL TXPH, LLC (MMGL) owns and operates Zybach 26 Central Tank Battery (Facility), an oil and natural gas production facility located in Hemphill County, Texas. Oil production is expected to be 10 barrels per day (BPD) and water production is expected to be 50 BPD. Maintenance, start-up, and shutdown (MSS) emissions are being claimed under 30 TAC §106.359 and are not being certified with this submittal.

The following supporting documentation has been included in this submittal:

- 1. List of each source of air emissions at the site and summary of the certified emission rates.
- 2. Process description.

PROCESS DESCRIPTION

The Facility receives gas and liquids from the wellhead(s). The gas and liquids from the wellhead(s) are sent to the production unit heater(s), where gas is sent to sales and liquids are sent to the heater treater. From the heater treater, gas is sent to sales, oil is sent to the oil storage tank(s), and produced water is sent to the produced water storage tank(s). Vapors from the storage tank(s) are vented to the atmosphere. Emissions from MSS activities are also included in this application.

During normal operations, the produced water and oil are transported offsite via truck.

Breathing, working and flash losses from the storage tanks were estimated using ProMax.

The gas analysis used in the fugitive calculations is a representative sample and the liquid analysis used in the ProMax is from a representative Facility.

The Facility was constructed prior to August 23, 2011; therefore, the site is not subject to NSPS Subpart OOOO/OOOOa. The tanks are not subject to NSPS Subpart Kb as they are located prior to custody transfer. The site is equipped with intermittent and/or low bleed pneumatic controllers, which are not subject to NSPS Subpart OOOO/OOOOa.

Texas Commission on Environmental Quality Form APD – CERT Certification of Emission Limits (Page 1)

I.	Company and Site Information
А.	Company Name: MMGL TXPH, LLC
В.	Responsible Official Name: Sean Craven
Respo	onsible Official's Title: Environmental Manager
Mailin	g Address: 13727 Noel Road, Suite 1200
City:	Dallas
Count	ty: Dallas
State:	TX
ZIP C	ode: 75240
Telepl	hone: 972-628-1572
Fax:	N/A
Email	Address: sean.craven@meritenergy.com
C.	Site Name: Zybach 26 Central Tank Battery
Street	t Address: (<i>if different from above)</i>
lf "NO	" street address describe the physical location with driving directions:
FRO	M INTERSECTION OF FM 1046 AND FM 3303 GO 1.7 MILES NORTH ON FM 3303 WEST ON LEASE
ROAD	D 4 MILES.
City o	r nearest city: Hemphill
Count	ty: Allison
ZIP C	ode: 79003
D.	TCEQ Account Identification Number (leave blank if unknown):
Е.	TCEQ Customer Reference Number (leave blank if unknown): CN606186393
TCEQ	Regulated Entity Number <i>(leave blank if unknown)</i> : RN105025076
F.	Does the site have a Title V Permit?
G.	Title V Permit Number:
Н.	Is this a small business?
П.	Attach the Following Documentations
А.	Copies of a previously completed Form PI-7 and all supporting documentation (<i>if applicable</i>).
В.	A list of each source of air emissions at the site.
C.	A summary of the certified emission rates.
D.	A process description.

Texas Commission on Environmental Quality Form APD – CERT Certification of Emission Limits (Page 2)

III. Maintain Records On Site to Demonstrate Continuing Compliance and Make the Records Available on Request

The emission rates listed on the certification shall reflect the certified emissions for the stationary sources at the site. The records demonstrating compliance with this certification must comply with applicable rules and must be maintained at the site or, for sites that normally operate unattended, at an office within Texas having day-to-day operational control of the site. Records must be kept for at least five years and must be made available upon request. For more information regarding records for permits by rule, see 30 TAC § 106.8, Recordkeeping.

IV. Purpose of this Certification (choose and complete all that are appropriate)

This certification is intended to establish emission rates below state and federal rule thresholds and triggers for:

30 TAC § 106.4 for Permits by Rule

Permit by Rule Number: 79757

HRVOC Emissions Cap and Trade Program

Emissions Banking and Trading Program (other than HRVOC)

30 TAC Chapter 115 for Volatile Organic Compounds

30 TAC Chapter 117 for Nitrogen Oxides

___ 40 CFR Part 60, Subpart:

40 CFR Part 61, Subpart:

40 CFR Part 63, Subpart:

Title V Permit Major Source Applicability

Other:

Texas Commission on Environmental Quality Form APD – CERT Certification of Emission Limits (Page 3)

V. Certification by Responsible Official

All representations in this certification of emissions are conditions upon which the stationary source shall operate. This certification reflects the maximum emission rates for the operation of this facility. The facility will operate in compliance with all regulations of the Texas Commission on Environmental Quality and with Federal U.S. Environmental Protection Agency regulations governing air pollution. It shall be unlawful for any person to vary from such representation unless the certification is first revised. The signature below indicates that, based on information and belief formed after reasonable inquiry, the statements, and information contained in the attached documents are true, accurate, and complete.

Name: Sean Craven

Title: Environmental Manager

Original Signature Required:

Date:

Reminder: The original of this certification must be sent to the TCEQ through ePermits. A copy must also be maintained on site or, for sites that normally operate unattended, at an office within Texas having day-to-day operational control of the site.

Signed electronically in STEERS

Texas Commission on Environmental Quality Form APD - CERT Certification of Emission Limits

			EMISSION RATE DA	АТА					
									n Certified on Rates
FIN	Facility Name	EPN	Point Name	Authorization Type	Authorization Date	Permit or Registration Number (if applicable)	Air Contaminant Name	lb/hr	T/yr
PU-1	Production Unit Heater (0.75 MMBtu/hr)	PU-1	Production Unit Heater (0.75 MMBtu/hr)	PBR	10/12/2020	79757	NOx	0.06	0.27
				PBR	10/12/2020	79757	со	0.05	0.22
				PBR	10/12/2020	79757	VOC	<0.01	0.01
				PBR	10/12/2020	79757	SO2	<0.01	<0.01
				PBR	10/12/2020	79757	PM10	<0.01	0.02
PU-2	Production Unit Heater (0.75 MMBtu/hr)	PU-2	Production Unit Heater (0.75 MMBtu/hr)	PBR	10/12/2020	79757	NOx	0.06	0.27
				PBR	10/12/2020	79757	со	0.05	0.22
				PBR	10/12/2020	79757	VOC	<0.01	0.01
				PBR	10/12/2020	79757	SO2	<0.01	<0.01
				PBR	10/12/2020	79757	PM10	<0.01	0.02
PU-3	Production Unit Heater (2 MMBtu/hr)	PU-3	Production Unit Heater (2 MMBtu/hr)	PBR	10/12/2020	79757	NOx	0.16	0.71
				PBR	10/12/2020	79757	со	0.14	0.60
				PBR	10/12/2020	79757	VOC	<0.01	0.04
				PBR	10/12/2020	79757	SO2	<0.01	<0.01
				PBR	10/12/2020	79757	PM10	0.01	0.05
HT-1	Heater Treater (0.5 MMBtu/hr)	HT-1	Heater Treater (0.5 MMBtu/hr)	PBR	10/12/2020	79757	NOx	0.04	0.18
				PBR	10/12/2020	79757	со	0.03	0.15
				PBR	10/12/2020	79757	VOC	<0.01	<0.01
				PBR	10/12/2020	79757	SO2	<0.01	<0.01
				PBR	10/12/2020	79757	PM10	<0.01	0.01
T-1	Oil Storage Tank (300-bbl)	T-1	Oil Storage Tank (300-bbl)	PBR	10/12/2020	79757	VOC	0.13	0.56
				PBR	10/12/2020	79757	H2S	<0.001	<0.001
T-2	Oil Storage Tank (300-bbl)	T-2	Oil Storage Tank (300-bbl)	PBR	10/12/2020	79757	VOC	0.13	0.56
				PBR	10/12/2020	79757	H2S	<0.001	<0.001
T-3	Oil Storage Tank (300-bbl)	T-3	Oil Storage Tank (300-bbl)	PBR	10/12/2020	79757	VOC	0.13	0.56
				PBR	10/12/2020	79757	H2S	<0.001	<0.001
T-4	Produced Water Storage Tank (300-bbl)	T-4	Produced Water Storage Tank (300-bbl)	PBR	10/12/2020	79757	VOC	<0.01	0.02
			- · ·	PBR	10/12/2020	79757	H2S	<0.001	<0.001
T-5	Produced Water Storage Tank (300-bbl)	T-5	Produced Water Storage Tank (300-bbl)	PBR	10/12/2020	79757	VOC	<0.01	0.02
			- · ·	PBR	10/12/2020	79757	H2S	<0.001	<0.001
T-6	Produced Water Storage Tank (300-bbl)	T-6	Produced Water Storage Tank (300-bbl)	PBR	10/12/2020	79757	VOC	0.00	0.02
			- · · ·	PBR	10/12/2020	79757	H2S	<0.001	<0.001
T-7	Produced Water Storage Tank (300-bbl)	T-7	Produced Water Storage Tank (300-bbl)	PBR	10/12/2020	79757	VOC	<0.01	0.02
			• · · · ·	PBR	10/12/2020	79757	H2S	<0.001	<0.001
T-8	Produced Water Storage Tank (300-bbl)	T-8	Produced Water Storage Tank (300-bbl)	PBR	10/12/2020	79757	VOC	<0.01	0.02
			• · · /	PBR	10/12/2020	79757	H2S	<0.001	<0.001
LOAD	Loading Emissions	LOAD	Loading Emissions	PBR	10/12/2020	79757	VOC	16.00	0.12
				PBR	10/12/2020	79757	H2S	<0.01	<0.001
FUG	Site Fugitives	FUG	Site Fugitives	PBR	10/12/2020	79757	VOC	1.68	7.37
			· · · · ·	PBR	10/12/2020	79757	H2S	<0.001	<0.001
MSS	Maintenance, Startup, Shutdown Emissions	MSS	Maintenance, Startup, Shutdown Emissions	PBR	10/12/2020	79757	VOC	8.19	0.27
						Emission Totals:	NOx	-	1.42
							со	-	1.19
							VOC	-	9.60
							SO ₂	-	0.01
							PM ₁₀	-	0.11

SUMMARY TABLE

ESTIMATED EMISSIONS															
EPN/Emission Source	Specific VOC or	V	C	N	O _x	C	0	PN	A ₁₀	PM	[_{2.5}	H	$_2$ S	S	O ₂
	Other Pollutants	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
PU-1 / Production Unit Heater (0.75 MMBtu/hr)		< 0.01	0.01	0.06	0.27	0.05	0.22	< 0.01	0.02	< 0.01	0.02			< 0.01	< 0.01
PU-2 / Production Unit Heater (0.75 MMBtu/hr)		< 0.01	0.01	0.06	0.27	0.05	0.22	< 0.01	0.02	< 0.01	0.02			< 0.01	< 0.01
PU-3 / Production Unit Heater (2 MMBtu/hr)		< 0.01	0.04	0.16	0.71	0.14	0.60	0.01	0.05	0.01	0.05			< 0.01	< 0.01
HT-1 / Heater Treater (0.5 MMBtu/hr)		< 0.01	< 0.01	0.04	0.18	0.03	0.15	< 0.01	0.01	< 0.01	0.01		1	< 0.01	< 0.01
T-1 / Oil Storage Tank (300-bbl)		0.13	0.56		-		-				-	< 0.001	< 0.001		
T-2 / Oil Storage Tank (300-bbl)		0.13	0.56		-		-				-	< 0.001	< 0.001		
T-3 / Oil Storage Tank (300-bbl)		0.13	0.56		-						-	< 0.001	< 0.001		
T-4 / Produced Water Storage Tank (300-bbl)		< 0.01	0.02		-		-				-	< 0.001	< 0.001		
T-5 / Produced Water Storage Tank (300-bbl)		< 0.01	0.02		-						-	< 0.001	< 0.001		
T-6 / Produced Water Storage Tank (300-bbl)		< 0.01	0.02		-						-	< 0.001	< 0.001		
T-7 / Produced Water Storage Tank (300-bbl)		< 0.01	0.02									< 0.001	< 0.001		
T-8 / Produced Water Storage Tank (300-bbl)		< 0.01	0.02									< 0.001	< 0.001		
LOAD / Loading Emissions		16.00	0.12									< 0.01	< 0.001		
FUG / Site Fugitives		1.68	7.37									< 0.001	< 0.001		
MSS / Tank Cleaning		8.13	0.02												
MSS / General MSS		0.06	0.25												
TOTAL I	EMISSIONS (TPY):		9.60		1.42		1.19		0.11		0.11		< 0.001		0.009
MAXIMUM OPERA	TING SCHEDULE:		Hour	s/Day	24	Days/	Week	7	Week	s/Year	52			Hours	s/Year

POTENTIAL EMISSIONS SUMMARY ZYBACH 26 MMGL TXPH, LLC HEMPHILL COUNTY, TEXAS

		N	O _x	v	ос	c	0	PM ₁₀ /	/PM _{2.5}	s	D ₂	H	₂S	ΤΟΤΑ	L HAPs
Emissions Source	EPN	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)
Production Unit Heater (0.75 MMBtu/hr)	PU-1	0.06	0.27	0.003	0.01	0.05	0.22	0.005	0.02	0.0004	0.002				
Production Unit Heater (0.75 MMBtu/hr)	PU-2	0.06	0.27	0.003	0.01	0.05	0.22	0.005	0.02	0.0004	0.002				
Production Unit Heater (2 MMBtu/hr)	PU-3	0.16	0.71	0.01	0.04	0.14	0.60	0.01	0.05	0.001	0.004				
Heater Treater (0.5 MMBtu/hr)	HT-1	0.04	0.18	0.002	0.01	0.03	0.15	0.003	0.01	0.0002	0.001				
Oil Storage Tank (300-bbl)	T-1			0.13	0.56							<0.001	<0.001	0.01	0.02
Oil Storage Tank (300-bbl)	T-2			0.13	0.56							<0.001	<0.001	0.01	0.02
Oil Storage Tank (300-bbl)	T-3			0.13	0.56							<0.001	<0.001	0.01	0.02
Produced Water Storage Tank (300-bbl)	T-4			0.004	0.02							<0.001	<0.001	0.0002	0.001
Produced Water Storage Tank (300-bbl)	T-5			0.004	0.02							<0.001	<0.001	0.0002	0.001
Produced Water Storage Tank (300-bbl)	T-6			0.004	0.02							<0.001	<0.001	0.0002	0.001
Produced Water Storage Tank (300-bbl)	T-7			0.004	0.02							<0.001	<0.001	0.0002	0.001
Produced Water Storage Tank (300-bbl)	T-8			0.004	0.02							<0.001	<0.001	0.0002	0.001
Loading Emissions	LOAD			16.00	0.12							0.003	<0.001	0.86	0.01
Site Fugitives	FUG			1.68	7.37							<0.001	<0.001	0.08	0.36
Tank Cleaning	MSS			8.13	0.02										
General MSS	MSS			0.06	0.25										
Total F	acility Emissions	0.32	1.42	26.29	9.60	0.27	1.19	0.02	0.11	0.00	0.01	0.003	<0.001	0.96	0.45

Note: General MSS is based on default TCEQ MSS calculations.

POTENTIAL EMISSIONS PRODUCTION UNIT HEATER (PU-1) ZYBACH 26 MMGL TXPH, LLC HEMPHILL COUNTY, TEXAS

	Max Firing Rate	Gas Heating Value	Emission Factors	Potential Emission Rates			
Pollutant	(MMBtu/hr)	(MMBtu/scf)	(Ib/MMSCF) ¹	(lb/hr)	(T/yr)		
NOx	0.75	1,235	100.00	0.06	0.27		
VOC	0.75	1,235	5.50	0.003	0.01		
CO	0.75	1,235	84.00	0.05	0.22		
PM	0.75	1,235	7.60	0.005	0.02		
SO2	0.75	1,235	0.60	0.0004	0.002		

Notes:

1. Emission factors obtained from AP-42 Table 1.4-1 through 1.4-3 for commercial boilers.

2. Potential emissions based on AP-42 emission factors, maximum firing rate,

POTENTIAL EMISSIONS PRODUCTION UNIT HEATER (PU-2) ZYBACH 26 MMGL TXPH, LLC HEMPHILL COUNTY, TEXAS

	Max Firing Rate	Gas Heating Value	Emission Factors	Potential Emission Rates ²				
Pollutant	(MMBtu/hr)	(MMBtu/scf)	(Ib/MMSCF) ¹	(lb/hr)	(T/yr)			
NOx	0.75	1,235	100.00	0.06	0.27			
VOC	0.75	1,235	5.50	0.003	0.01			
CO	0.75	1,235	84.00	0.05	0.22			
PM	0.75	1,235	7.60	0.005	0.02			
SO2	0.75	1,235	0.60	0.0004	0.002			

Notes:

1. Emission factors obtained from AP-42 Table 1.4-1 through 1.4-3 for commercial boilers.

2. Potential emissions based on AP-42 emission factors, maximum firing rate,

POTENTIAL EMISSIONS PRODUCTION UNIT HEATER (PU-3) ZYBACH 26 MMGL TXPH, LLC HEMPHILL COUNTY, TEXAS

	Max Firing Rate	Gas Heating Value	Emission Factors	Potential Emission Rates				
Pollutant	(MMBtu/hr)	(MMBtu/scf)	(Ib/MMSCF) ¹	(lb/hr)	(T/yr)			
NOx	2.00	1,235	100.00	0.16	0.71			
VOC	2.00	1,235	5.50	0.01	0.04			
CO	2.00	1,235	84.00	0.14	0.60			
PM	2.00	1,235	7.60	0.01	0.05			
SO2	2.00	1,235	0.60	0.001	0.004			

Notes:

1. Emission factors obtained from AP-42 Table 1.4-1 through 1.4-3 for commercial boilers.

2. Potential emissions based on AP-42 emission factors, maximum firing rate

POTENTIAL EMISSIONS HEATER TREATER (HT-1) ZYBACH 26 MMGL TXPH, LLC HEMPHILL COUNTY, TEXAS

	Max Firing Rate	Gas Heating Value	Emission Factors	Potential Emi	ission Rates ²
Pollutant	(MMBtu/hr)	(MMBtu/scf)	(Ib/MMSCF) ¹	(lb/hr)	(T/yr)
NOx	0.50	1,235	100.00	0.04	0.18
VOC	0.50	1,235	5.50	0.002	0.01
СО	0.50	1,235	84.00	0.03	0.15
PM	0.50	1,235	7.60	0.003	0.01
SO2	0.50	1,235	0.60	0.0002	0.001

Notes:

1. Emission factors obtained from AP-42 Table 1.4-1 through 1.4-3 for commercial boilers.

2. Potential emissions based on AP-42 emission factors, maximum firing rate

POTENTIAL EMISSIONS STORAGE TANKS ZYBACH 26 MMGL TXPH, LLC HEMPHILL COUNTY, TEXAS

					Potential	VOC Emissio	ns		Potent	ial H2S Emi	ssions	Potential	HAP Emis	ssions
Source	EU-ID	Annual Throughput ¹	Tank Capacity	Annual Breathing Losses ²	Annual Working Losses ²	Annual Flash Losses ³	Total Emiss	VOC sions ⁴	H2S ⁵	H2S Emiss	Tank iions ⁶	HAP ⁵	HAP Emiss	Tank sions ⁶
		(gallons/year)	(gallons)	(T/yr)	(T/yr)	(T/yr)	(lb/hr)	(T/yr)	(% of VOC)	(lb/hr)	(T/yr)	(% of VOC)	(lb/hr)	(T/yr)
Oil Storage Tank (300-bbl)	T-1	51,100	12,600	0.21	0.08	0.26	0.13	0.56	0.01%	0.00002	0.0001	4.32%	0.01	0.02
Oil Storage Tank (300-bbl)	T-2	51,100	12,600	0.21	0.08	0.26	0.13	0.56	0.01%	0.00002	0.0001	4.32%	0.01	0.02
Oil Storage Tank (300-bbl)	T-3	51,100	12,600	0.21	0.08	0.26	0.13	0.56	0.01%	0.00002	0.0001	4.32%	0.01	0.02
Produced Water Storage Tank (300-bbl)	T-4	153,300	12,600	0.01	0.003	0.01	0.004	0.02	0.06%	0.000002	0.00001	5.41%	0.0002	0.001
Produced Water Storage Tank (300-bbl)	T-5	153,300	12,600	0.01	0.003	0.01	0.004	0.02	0.06%	0.000002	0.00001	5.41%	0.0002	0.001
Produced Water Storage Tank (300-bbl)	T-6	153,300	12,600	0.01	0.003	0.01	0.004	0.02	0.06%	0.000002	0.00001	5.41%	0.0002	0.001
Produced Water Storage Tank (300-bbl)	T-7	153,300	12,600	0.01	0.003	0.01	0.004	0.02	0.06%	0.000002	0.00001	5.41%	0.0002	0.001
Produced Water Storage Tank (300-bbl)	T-8	153,300	12,600	0.01	0.003	0.01	0.004	0.02	0.06%	0.000002	0.00001	5.41%	0.0002	0.001

Notes:

1. Based on maximum annual oil throughput value of 3,650-bbl/yr and maximum annual produced water throughput value of 18,250-bbl/yr.

2. Annual breathing and working losses were determined using ProMax simulation.

3. Annual flash emissions from the storage tanks were determined using ProMax simulation.

4. Total VOC Emissions = ((Breathing Losses (T/yr) + Working Losses (T/yr))) + Flash Emissions (T/yr)

5. HAP/H2S percent of VOC determined using ProMax simulation.

6. Total H2S or HAP Emissions = Total VOC Emissions x H2S or HAP (%).

POTENTIAL EMISSIONS TRUCK LOADING (LOAD) ZYBACH 26 MMGL TXPH, LLC HEMPHILL COUNTY, TEXAS

Material Name	EU-ID	Saturation Factor ¹	True V Press (F	sure ²	Molecular Weight of Vapors ² (M)	Loaded	ip of Liquid ² F)	Emissior (Ib VOC	-	Annual Throughput ³	Estimated Hourly Throughput ³	Weight Percent of VOC in HC Vapors	To Uncon VOC En	trolled		otal nissions	To HAP En	otal nissions
		(S)	Max	Avg	(lb/lb-mole)	Max	Avg	Max	Avg	(gals)	(gal)	(%)	(lb/hr) ⁴	(T/yr) ⁵	(lb/hr) ⁴	(T/yr) ⁵	(lb/hr) ⁴	(T/yr) ⁵
Oil Produced Water	C LOAD PW LOAD	0.6 0.6	8.36 13.26	6.83 12.49	37 20	95 95	65.32 65.32	4.12 3.61	3.55 3.59	153,300 766,500	8,000 8,000	95.02% 100.00%	15.85 0.15	0.12 0.0004	0.001 0.002	1.07E-05 	0.86 0.15	0.01 0.0004
												Total	16.00	0.12	0.003	1.07E-05	1.01	0.01

Notes:

1. Per AP-42, 5th Edition (6/08), Section 5.2, Equation 1: Saturation Factor = 0.6 for submerged loading: dedicated normal service

2. True vapor pressure, weight of vapors and temp of loaded liquid obtained from Promax.

3. Throughput is the amount of oil/water loaded out from the storage tanks. It is estimated that one truck can load 8,000 gallons in one hour.

4. Uncontrolled Hourly VOC/HAP Emissions calculated from Promax.

5. Uncontrolled Annual VOC/HAP Emissions calculated using Promax.

POTENTIAL EMISSIONS SITEWIDE FUGITIVES (FUG) ZYBACH 26 MMGL TXPH, LLC HEMPHILL COUNTY, TEXAS

Component	Type of	Estimated Equipment	Emission Factor	% VOC ³	% H2S	% HAP ³		DC sions	H2S Emissions		HAP Emissions	
Туре	Service	At Site ¹	lb/hr/component ²				(lb/hr)	(T/yr)	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)
Flanges	Light Oil	140	0.000243	99.99%		5.45%	0.03	0.15			0.002	0.01
	Water/Oil	140	0.000006	99.99%		5.45%	0.001	0.004			0.00005	0.0002
Valves	Gas	325	0.009920	25.65%	0.004%	1.18%	0.83	3.62	0.0001	0.0005	0.04	0.17
	Light Oil	72	0.005500	99.99%		5.45%	0.40	1.73			0.02	0.09
	Water/Oil	72	0.000216	99.99%		5.45%	0.02	0.07			0.001	0.004
Connectors	Gas	993	0.000440	25.65%	0.004%	1.18%	0.11	0.49	0.00002	0.0001	0.005	0.02
	Light Oil	92	0.000463	99.99%		5.45%	0.04	0.19			0.002	0.01
	Water/Oil	92	0.000243	99.99%		5.45%	0.02	0.10			0.001	0.005
Open-Ended Lines	Gas	38	0.004410	25.65%	0.004%	1.18%	0.04	0.19	0.00001	0.00003	0.002	0.01
Other	Light Oil	4	0.016500	99.99%		5.45%	0.07	0.29			0.004	0.02
	Water/Oil	4	0.030900	99.99%		5.45%	0.12	0.54			0.01	0.03
Tota	l Component Count	1972				Total	1.68	7.37	1.39E-04	6.08E-04	0.08	0.36

Notes:

1. Number of each component and type of service estimated based on a similar site.

2. Emission factors based on EPA's oil and gas production operations factors for process piping fugitive emissions.

3. Percent VOC, H2S, and HAP based on a representative sample and ProMax (refer to Tables 10 & 11).

POTENTIAL EMISSIONS FROM MSS ACTIVITIES (MSS) ZYBACH 26 MMGL TXPH, LLC HEMPHILL COUNTY, TEXAS

Summary of M	ISS Activities	6				
Activity	VC)C ¹	Р	M	Other	HAPs
Activity	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)	(lb/hr)	(T/yr)
Engine, compressor, turbine and other combustion facilities maintenance			-	-	-	-
Repair, adjustment, calibration, lubrication and cleaning of site process equipment			-	-	-	-
Replacement of piping components, pneumatic controllers, boiler refractories, wet and dry seals, meters, instruments, analyzers, screens and filters	0.06	0.25	-	-	-	-
Turbine or engine component swaps			-	-	-	-
Piping used to bypass a facility during maintenance			-	-	-	-
Pigging and purging of piping	73.18	0.37	-	-	-	-
Abrasive blasting, surface preparation and surface coating of facilities and structures used at the site	8.13	0.02	0.68	0.001	0.08	0.0002
Total =	81.37	0.63	0.68	0.001	0.08	0.0002

MSS - Pigging Operations

Description	Pigging
Number of Events per Year	10
Number of Events per hour	1
Volume per Event, scf	5000
Stream Specific Gravity	0.7467
Air MW, lb/mole	28.96
Fuel Stream Density, lb/scf	0.057
VOC Percentage in Gas Stream, wt%	25.65%
VOC Hourly Emission Rate (lb/hr):	73.18
VOC Annual Emission Rate (T/yr):	0.37

MSS - Sandblasting

Description		Sandblasting		
Application Rate ¹	2,000	lb/hr		
Operating Hours	4	hr/yr		
PM10 Emission Factor ¹	0.00034	lb/lb usage		
PM2.5 Emission Factor ¹	0.00005	lb/lb usage		
PM10 Emissions	0.68	lb/hr		
PM10 Emissions	0.001	T/yr		
PM2.5 Emissions	0.10	lb/hr		
PM2.5 Emissions	<0.01	T/yr		

MSS - Solvent Cleaning

Description		Solvent Cleaning	
Annual Usage	5	gal/yr	
Maximum Hourly Usage	1	gal/hr	
Density	6.5	lb/gal	
VOC Wt%	100%	-	
Dipropylene Glycol Methyl Ether Wt%	1%	-	
HAP Emissions	0.08	lb/hr	
HAP Emissions	0.0002	T/yr	
VOC Emissions	8.13	lb/hr	
VOC Emissions	0.02	T/yr	

Notes:

1. Defaults from TCEQ emissions spreadsheet.

GAS ANALYSIS ZYBACH 26 MMGL TXPH, LLC HEMPHILL COUNTY, TEXAS

Component	Molecular Weight	Mole % ¹	lb/100 mole	Wt % Total	Wt % Hydrocarbon	Wt % VOC ²
Hydrogen Sulfide	34.08	0.0023%	0.001	0.004%		
Nitrogen	28.01	0.80%	0.23	1.04%		
Carbon Dioxide	44.01	0.25%	0.11	0.50%		
Methane	16.04	79.31%	12.72	58.89%	58.89%	
Ethane	30.07	10.28%	3.09	14.31%	14.31%	
Propane	44.10	4.67%	2.06	9.54%	9.54%	9.69%
i-Butane	58.12	0.74%	0.43	1.99%	1.99%	2.02%
n-Butane	58.12	1.58%	0.92	4.25%	4.25%	4.32%
i-Pentane	72.15	0.47%	0.34	1.57%	1.57%	1.60%
n-Pentane	72.15	0.56%	0.41	1.88%	1.88%	1.91%
Other Hexanes	86.17	0.27%	0.23	1.07%	1.07%	1.09%
Heptanes	100.20	0.50%	0.50	2.33%	2.33%	2.37%
Octanes+	114.23	0.28%	0.32	1.46%	1.46%	1.49%
Benzene	78.11	0.01%	0.01	0.05%	0.05%	0.06%
Toluene	92.14	0.03%	0.02	0.12%	0.12%	0.12%
Ethylbenzene	106.17	0.001%	0.001	0.005%	0.005%	0.005%
Xylenes	106.17	0.01%	0.01	0.05%	0.05%	0.05%
n-Hexane	86.17	0.23%	0.20	0.93%	0.93%	0.94%
Total		100.00%	21.60	100.00%	98.45%	25.65%

Notes:

- 1. Representative gas analysis and extended HAPs based on a sample taken 08/15/2024. H2S is represented as 23 ppm to allow for changes in gas quality.
- 2. Wt % VOC is the VOC % in the hydrocarbon portion of the gas.

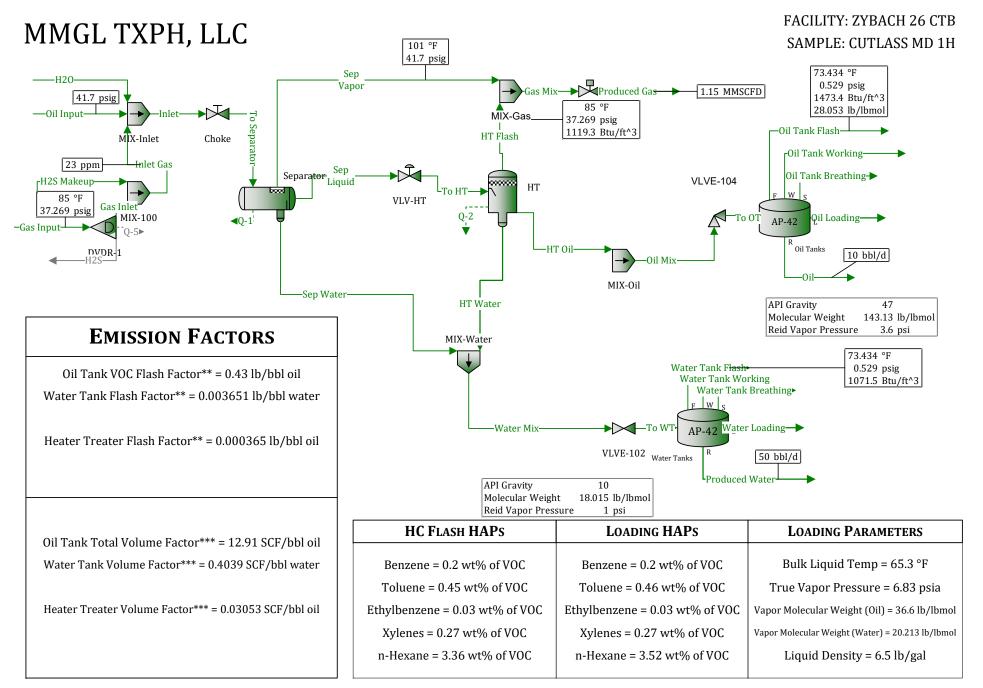
LIQUID ANALYSIS ZYBACH 26 MMGL TXPH, LLC HEMPHILL COUNTY, TEXAS

Component	Molecular Weight	Mole % ¹	lb/100 mole	Wt % Total	Wt % Hydrocarbon	Wt % VOC ²
Water	18.01	0.09%	0.02	0.01%		
Nitrogen	28.01	0.00002%	0.00001	0.000005%		
Ethane	30.07	0.05%	0.02	0.01%	0.01%	
Propane	44.10	0.91%	0.40	0.37%	0.37%	0.37%
i-Butane	58.12	0.42%	0.25	0.23%	0.23%	0.23%
n-Butane	58.12	1.39%	0.81	0.75%	0.75%	0.75%
i-Pentane	72.15	1.06%	0.77	0.71%	0.71%	0.71%
n-Pentane	72.15	1.69%	1.22	1.13%	1.13%	1.13%
Other Hexanes	86.17	1.31%	1.13	1.05%	1.05%	1.05%
Heptanes	100.20	14.32%	14.35	13.32%	13.32%	13.32%
Octanes+	114.23	72.59%	82.92	76.96%	76.96%	76.97%
Benzene	78.11	0.17%	0.13	0.12%	0.12%	0.12%
Toluene	92.14	1.18%	1.09	1.01%	1.01%	1.01%
Ethylbenzene	106.17	0.23%	0.25	0.23%	0.23%	0.23%
Xylenes	106.17	2.29%	2.43	2.25%	2.25%	2.25%
n-Hexane	86.17	2.29%	1.97	1.83%	1.83%	1.83%
Total		100.00%	107.75	100.00%	99.99%	99.99%

Notes:

1. Liquid analysis based on ProMax.

2. Wt % VOC is the VOC % in the hydrocarbon portion of the gas.



*GOR is the total flash volume from all vessels per barrel of stock tank oil.

 $\ast\ast$ Flash Factors are the pounds of VOC emissions per barrel of stock tank oil/stock tank water.

***Volume Factors are the total flash volume per barrel of stock tank oil/stock tank water.



Number: 1030-24080790-005A

Liz Morgan Merit Energy Company 13727 Noel Road, Suite 1200 Dallas, TX 75240

Station Name	:Cutlass MD 1H
Cylinder No:	000356
Instrument 1:	HGC 19A + 19B, Front TCD #19A
Instrument 2:	HGC 7A, HP6890 Signal 1
Instrument 3:	HGC 19A + 19B, Rear TCD #19B
	High Temp, HTSD
Analyzed:	09/03/2024 09:47:05 by SMS

Report Date:	09/10/202	4
Sampled By:	TL	
Sample Of:	Liquid	Spot
Sample Date:	08/15/202	4
Sample Condition	s:41.7 psig,	@ 101.3 °F
Received Date:	08/23/202	4
Login Date:	08/26/202	4
Method:	GPA 2103	M

Components	Mol. %	MW	Wt. %	Sp. Gravity	L.V. %		
Nitrogen	0.037	28.013	0.008	0.8069	0.008		
Methane	0.900	16.043	0.110	0.3000	0.282		
Carbon Dioxide	0.009	44.010	0.003	0.8172	0.003		
Ethane	1.065	30.069	0.244	0.3563	0.527		
Propane	1.968	44.096	0.661	0.5072	1.004		
Iso-Butane	0.763	58.122	0.338	0.5628	0.463		
n-Butane	2.532	58.122	1.121	0.5842	1.478		
Iso-Pentane	1.750	72.149	0.962	0.6251	1.185		
n-Pentane	2.794	72.149	1.536	0.6307	1.876		
i-Hexanes	2.775	86.175	1.822	0.6641	2.113		
n-Hexane	3.354	86.175	2.202	0.6641	2.554		
2,2,4-Trimethylpentane	0.055	114.229	0.048	0.6964	0.053		
Benzene	0.252	78.112	0.150	0.8844	0.131		
Heptanes	13.941	100.202	10.642	0.6882	11.909		
Toluene	1.801	92.138	1.264	0.8719	1.117		
Octanes	19.536	114.229	17.001	0.7066	18.532		
Ethylbenzene	0.346	106.165	0.280	0.8716	0.247		
Xylenes	2.990	106.165	2.418	0.8732	2.133		
Nonanes	9.922	128.255	9.695	0.7222	10.338		
Decanes Plus	33.210	195.626	49.495	0.8654	44.047		
	100.000		100.000		100.000		
Calculated Physical Prope	erties		Total	C10+			
Specific Gravity at 60°F		0.	7702	0.8654			
API Gravity at 60°F		52	2.227	32.010			
Molecular Weight		13 [.]	1.260	195.626			
Pounds per Gallon (in Vacu	um)	6	5.421	7.215			
Pounds per Gallon (in Air)		6	5.414	7.207			
Cu. Ft. Vapor per Gallon @	14.696 psia	18	3.564	13.996			

Analytical Data

- 4 art

Andy Hartman, Laboratory Director

Quality Assurance:

The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated. The test results apply to the sample as received.



Number: 1030-24080790-005A

Liz Morgan Merit Energy Company 13727 Noel Road, Suite 1200 Dallas, TX 75240

Station Name:Cutlass MD 1HMethod:GPA 2103MCylinder No:000356Instrument 1:HGC 19A + 19B, Front TCD #19AInstrument 2:High Temp, HTSDAnalyzed:09/03/2024 09:47:05 by SMS

Report Date:09/10/2024Sampled By:TLSample Of:LiquidSpotSample Date:08/15/2024Sample Conditions: 41.7 psig, @101.3 °FReceived Date:08/23/2024Login Date:08/26/2024

Analytical Data			
Components	Mol. %	Wt. %	L.V. %
Nitrogen	0.037	0.008	0.008
Methane	0.900	0.110	0.282
Carbon Dioxide	0.009	0.003	0.003
Ethane	1.065	0.244	0.527
Propane	1.968	0.661	1.004
Iso-Butane	0.763	0.338	0.463
n-Butane	2.532	1.121	1.478
Iso-Pentane	1.750	0.962	1.185
n-Pentane	2.794	1.536	1.876
i-Hexanes	2.775	1.822	2.113
n-Hexane	3.354	2.202	2.554
2,2,4-Trimethylpentane	0.055	0.048	0.053
Benzene	0.252	0.150	0.131
Heptanes	13.941	10.642	11.909
Toluene	1.801	1.264	1.117
Octanes	19.536	17.001	18.532
Ethylbenzene	0.346	0.280	0.247
Xylenes	2.990	2.418	2.133
Nonanes	9.922	9.695	10.338
C10	8.544	9.176	8.602
C11	5.910	7.007	6.465
C12	4.016	5.217	4.749
C13	3.249	4.593	4.133
C14	2.440	3.730	3.322
C15	1.813	2.980	2.630
C16	1.299	2.300	2.030
C17	1.057	2.002	1.734
C18	0.809	1.622	1.396
C19	0.642	1.350	1.155
C20	0.534	1.173	0.998
C21	0.534		
C21 C22	0.405	0.941 0.900	0.796 0.757
C22 C23	0.375	0.900	0.606
C24 C25	0.252 0.214	0.653 0.575	0.544 0.477
	0.214 0.177		
C26		0.493	0.407
C27	0.157	0.451	0.371
C28	0.129	0.384	0.315
C29	0.110	0.336	0.275

C30 Plus

2.301

100.000

0.787

100.000

2.883

100.000



Number: 1030-24080790-005A

Liz Morgan Merit Energy Company 13727 Noel Road, Suite 1200 Dallas, TX 75240

Station Name: Cutlass MD 1H					
Method:	GPA 2103M				
Cylinder No:	000356				
Instrument 1:	HGC 19A + 19B, Front TCD #19A				
	High Temp, HTSD				
Analyzed:	09/03/2024 09:47:05 by SMS				

Report Date:	09/10/2024	
Sampled By:	TL	
Sample Of:	Liquid	Spot
Sample Date:	08/15/2024	
Sample Conditions	:41.7 psig, @	2 101.3 °F
Received Date:	08/23/2024	
Login Date:	08/26/2024	

Calculated Physical Properties	Total	C30+
Specific Gravity at 60°F	0.7702	0.9235
API Gravity at 60°F	52.227	21.722
Molecular Weight	131.260	458.288
Pounds per Gallon (in Vacuum)	6.421	7.699
Pounds per Gallon (in Air)	6.414	7.691
Cu. Ft. Vapor per Gallon @ 14.696 psia	18.564	6.375

Hart

Andy Hartman, Laboratory Director The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated. The test results apply to the sample as received.

Quality Assurance:



Number: 9050-24080051-005A

Aug. 21, 2024

Sean Craven Merit Energy 1510 East Thomas Rd Kalkaska, MI 49646

Station Name: CUTLASS MD 1HMethod:GPA 2286Cylinder No:2500-01215Analyzed:08/20/2024 14:51:44 by DL

Sampled By:Tim LebsackSample Of:Natural GasSpotSample Date:08/15/2024Sample Conditions: 50.0 psia, @ 85.0 °F

Analytical Data

Nitrogen Carbon Dioxide	0.805					
		1.047		GPM TOTAL C2+	5.701	
	0.246	0.502				
Methane	79.309	59.047				
Ethane	10.278	14.343	2.752			
Propane	4.674	9.565	1.289			
Iso-Butane	0.738	1.991	0.242			
n-Butane	1.581	4.265	0.499			
Iso-Pentane	0.471	1.577	0.172			
n-Pentane	0.564	1.888	0.205			
i-Hexanes	0.268	1.048	0.107			
n-Hexane	0.233	0.922	0.095			
Benzene	0.015	0.053	0.004			
Cyclohexane	0.190	0.740	0.064			
i-Heptanes	0.231	0.994	0.094			
n-Heptane	0.081	0.373	0.037			
Toluene	0.027	0.116	0.009			
i-Octanes	0.218	1.063	0.095			
n-Octane	0.022	0.121	0.011			
Ethylbenzene	0.001	0.007	0.000			
Xylenes	0.011	0.058	0.004			
i-Nonanes	0.023	0.160	0.013			
n-Nonane	0.005	0.027	0.003			
Decane Plus	0.009	0.093	0.006			
	100.000	100.000	5.701			
Calculated Physical Properties Calculated Molecular Weight			Total 21.55	C10+ 145.80		
GPA 2172 Calculation						
Calculated Gross BTU	U per ft ³ @	14.696 ps		7070 0		
Real Gas Dry BTU		1289.0	7953.0			
Water Sat. Gas Base BTU		1266.5	7784.6			
Relative Density Real Gas		0.7461	5.0341			
Compressibility Factor		0.9962				
Comments: H2S Fiel	Id Content	0 %				



Hydrocarbon Laboratory Manager

Quality Assurance:

The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.



Number: 9050-24080051-005A

Aug. 21, 2024

Sean Craven Merit Energy 1510 East Thomas Rd Kalkaska, MI 49646

Station Name: CUTLASS MD 1HMethod:GPA 2286Cylinder No:2500-01215Analyzed:08/20/2024 14:51:44 by DL

Sampled By:Tim LebsackSample Of:Natural GasSpotSample Date:08/15/2024Sample Conditions: 50.0 psia, @ 85.0 °F

Analytical Data

Components	Mol. %	Wt. %	GPM at 14.696 psia			
Nitrogen	0.805	1.047		GPM TOTAL C2+	5.701	
Carbon Dioxide	0.246	0.502		GPM TOTAL C3+	2.949	
Methane	79.309	59.047		GPM TOTAL iC5+	0.919	
Ethane	10.278	14.343	2.752			
Propane	4.674	9.565	1.289			
Iso-Butane	0.738	1.991	0.242			
n-Butane	1.581	4.265	0.499			
Iso-Pentane	0.471	1.577	0.172			
n-Pentane	0.564	1.888	0.205			
Hexanes	0.501	1.970	0.202			
Heptanes Plus	0.833	3.805	0.340			
	100.000	100.000	5.701			
Calculated Physica	I Properties		Total			
Relative Density Rea	al Gas		0.7461			
Calculated Molecula	r Weight		21.55			
Compressibility Fact	or		0.9962			
GPA 2172 Calculat	ion:					
Calculated Gross E	BTU per ft ³ @	2 14.696 ps	sia & 60°F			
Real Gas Dry BTU		-	1289			
Water Sat. Gas Bas	e BTU		1267			

Comments: H2S Field Content 0 %

Hydrocarbon Laboratory Manager The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.

Powered By SURECHEM



Number: 9050-24080051-005A

Aug. 21, 2024

Sean Craven Merit Energy 1510 East Thomas Rd Kalkaska, MI 49646

Station Name: CUTLASS MD 1HMethod:GPA 2286Cylinder No:2500-01215Analyzed:08/20/2024 14:51:44 by DL

Sampled By:Tim LebsackSample Of:Natural GasSpotSample Date:08/15/2024Sample Conditions: 50.0 psia, @ 85.0 °F

Analytical Data

Components	Mol. %	Wt. %	GPM a 14.696 psia			
Nitrogen	0.805	1.047		GPM TOTAL C2+	5.701	
Carbon Dioxide	0.246	0.502		GPM TOTAL C3+	2.949	
Methane	79.309	59.047		GPM TOTAL iC5+	0.919	
Ethane	10.278	14.343	2.752	•		
Propane	4.674	9.565	1.289			
Iso-butane	0.738	1.991	0.242			
n-Butane	1.581	4.265	0.499			
Iso-pentane	0.471	1.577	0.172			
n-Pentane	0.564	1.888	0.205	i		
Hexanes Plus	1.334	5.775	0.542			
	100.000	100.000	5.701	-		
Calculated Physica	I Properties		Total	C6+		
Relative Density Rea	al Gas		0.7461	3.1923		
Calculated Molecula	Calculated Molecular Weight		21.55	92.46		
Compressibility Factor		0.9962				
GPA 2172 Calculat	ion:					
Calculated Gross E	BTU per ft ³ @	2 14.696 ps	ia & 60°F			
Real Gas Dry BTU			1289.00	4987.97		
Water Sat. Gas Base BTU			1266.50	4900.96		
Comments: H2S F	ield Content	0 %				

Hydrocarbon Laboratory Manager The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.

Quality Assurance: