

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

GENERAL OPERATING PERMIT (GOP) INITIAL ISSUANCE

GOP Type:	514	Company:	ET Gathering & Processing LLC
Permit #:	O4730	Site:	B2LTW CDP
Project #:	37720	Application Area:	B2LTW CDP
Regulated Entity #:	RN106005945	Customer #:	CN606187110
Region:	16	County:	Webb
NAICS Code:	211130	NAICS Name:	NATURAL GAS EXTRACTION
Permit Reviewer:	Liam Lin		

SITE INFORMATION

Physical Location: From HWY 83 go SW on CR 2688 make sharp left to enter Briscoe Ranch Gate on right, stay left to gate 7 turn right to 2nd gate turn right to facility on right

Nearest City: Catarina

Major Pollutants: VOC

Additional FOPs: None

PROJECT SUMMARY

ET Gathering & Processing LLC, B2LTW CDP site is a Natural Gas Extraction facility and a major source of emissions. It is subject to the requirements of 30 TAC Chapter 122 which requires it to apply and obtain a Federal Operating Permit (FOP). An initial abbreviated Authorization to Operate (ATO) application under General Operating Permit (GOP) No. 514 was received by TCEQ on February 24, 2025; the full application was received on March 25, 2025. Some of the significant emission sources at the site include compressor engines, a flare, fugitive equipment, a gunbarrel tank, generator engines, reciprocating compressors, and storage tanks. The emission sources are subject to State and/or Federal regulations. No units in this application are subject to CAM/PM. Forms OP-1, OP-CRO1, OP-ACPS, OP-REQ1, OP-REQ2 and OP-REQ3 and various unit attribute forms were submitted to accomplish this initial issuance.

PROCESS DESCRIPTION

Streams from surrounding wells are routed to a two-phase inlet separator. Up to 25 million standard cubic feet per day (MMscfd) of natural gas is routed from the separator through compression driven by five (5) natural gas fired stationary reciprocating internal combustion engines (Unit IDs COMP-1 through COMP-5) and sent out via the sales pipeline. A small portion of the compressed gas is sent to the fuel gas system, used to supply fuel for the compressor engines, generator engines, and line heater.

Liquids from the two-phase inlet separator are routed through a line heater to a three-phase separator. Flash gas from the three-phase separator is routed back to inlet, with flare (Unit ID FL-1) control as backup.

Produced water from the three-phase separator is routed to two (2) 1,000-barrel produced water storage tanks (Group ID GRP-TKW2) and four (4) 400-barrel produced water storage tanks (Group ID GRP-TKW1). Vapors from the produced water tanks are captured by an electric vapor recovery unit (VRU) and routed to inlet. If the VRU is down, the vapors can be sent to the flare (Unit ID FL-1) for destruction. Produced water is loaded into trucks for removal from the Facility, and the produced water truck loading vapors are released to atmosphere.

Condensate from the three-phase separator is routed to eight (8) 1,000- barrel condensate storage tanks (Group IDs GRP-TKC1 and GRP-TKC2). Vapors from the condensate tanks are captured by the VRU and routed to inlet. If the VRU is down, the vapors can be sent to the flare (Unit ID FL-1) for destruction. A maximum condensate volume of 7500 barrels per day (bpd) is primarily removed from the site via pipeline but has the option of being loaded into trucks for removal from the Facility. The condensate truck loading vapors are captured by the VRU and routed to inlet. If the VRU is down, the vapors can be sent to the flare (Unit ID FL-1) for destruction. If needed, a portion of the condensate can be sent through the condensate rerun.

The condensate rerun is sent to the 1200-barrel gunbarrel tank (Unit ID GB-1). Vapors from the gunbarrel tank are captured by the VRU and routed to inlet. If the VRU is down, the vapors can be sent to the flare (Unit ID FL-1) for destruction. Produced water from the gunbarrel tank is sent to the produced water storage tanks. Condensate from the gunbarrel tank is sent to the condensate storage tanks.

The Facility is not connected to the electrical grid, so electricity is provided by two (2) natural gas engine-driven generators (Unit IDs GEN-1 and GEN-2).

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?..... Yes
- 3. Was form OP-REQ2 submitted?..... Yes
- 4. Were any high-level GOP index numbers included in the IMS for this project?..... Yes
- 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:

- Negative applicability was documented in the IMS from Form OP-REQ2 for the following units and groups:
 - o Unit IDs RECIP-1, RECIP-2, RECIP-3, RECIP-4, RECIP-5, GB-1 for regulation NSPS OOOOb
 - o Group IDs GRP-TKW1 GRP-TKW2, GRP-TKC1 and GRP-TKC2 for regulation NSPS Kc.
- Form OP-REQ3 was included for Unit IDs FUG, FL-1, GRP-TKW1, GRP-TKW2, GRP-TKC1 and GRP-TKC2 for regulation NSPS OOOOb.
- High Level Index number (514-NT-HLVL) was used for Unit ID FUG to represent NSPS OOOOb.

Compliance History Review

- 1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on April 4, 2025
Site rating: Unclassified Company rating: 2.94 / 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 any units not in compliance?..... No

Permit reviewer notes:

- There was no Compliance History information or there were no applicable enforcement components for the site at the time of the last Mass Classification in September of 2024 because the site is new.
- TCEQ OP-ACPS compliance form submitted by applicant shows that all units are in compliance.

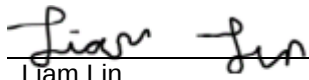
Delinquent Fee Check

- 1. The delinquent fee check was performed on 04/02/2025.
- 2. Were there any delinquent fees owed? No

IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	02/24/2025	
Date Project Received by Engineer	03/12/2025	
Technical Review Period	03/24/2025	04/04/2025

EFFECTIVE PERMIT ISSUANCE DATE: April 16, 2025



Liam Lin
Permit Reviewer
Operating Permits Section
Air Permits Division

04/07/2025

Date



Elizabeth Moorhead
Team Leader
Operating Permits Section
Air Permit Division

04/14/2025

Date

CONTACT INFORMATION

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