From:	<u>Rykki Tepe@xtoenergy.com</u>
To:	Bonnie Braganza/R6/USEPA/US@EPA
Subject:	Jicarilla Compressor Station - Contact Information
Date:	10/04/2012 09:15 AM

Bonnie:

As discussed, please send any questions / comments on the Jicarilla Compressor Station to me. If you need any clarification or explanation on processes, please don't hesitate to contact me. My contact information is provided below. Thank you!

Thank You.

Rykki R. Tepe Environmental Engineer XTO Energy, Inc. 810 Houston Street | Fort Worth, TX 76102 Office: 817.885.1249 Cell: 817.253.2986 Fax: 817.885.2683 Email: Rykki_Tepe@xtoenergy.com

From:	<u>Rykki Tepe@xtoenergy.com</u>
To:	Bonnie Braganza/R6/USEPA/US@EPA
Subject:	Re: Jicarilla Compressor Station - Contact Information
Date:	10/26/2012 10:34 AM

Bonnie: Please see my answers below to your questions.

nnie: Please see my answers below to your questions. RICES Fuel Usage: If you refer to page 3-4 and 3-5 of the submitted applications, you will find the estimated fuel use rates for the RICES. These were calculated with an estimated fuel heating valve and manufacturing provided data. Fuel Use Rate (scf/hr) = horsepower * Fuel Use Rate (Btu/hp-hr) RICES Loading Rates: The loading rates are based on manufacture specifications and NMED guidance for derations. For every 1000 feet over 4000 ft, calculations account for a 3% deration of horsepower. 6550 hp - 4000 hp = 2550 hp; Deration Factor = 2550 hp/1000 hp * 3% = 7.7% deration factor. Altitude derated output = Rated Horsepower (hp) * (1.0 - deration factor) = 1,004hp * (1.0 - 0.077) = 926.27 hp Heaters Fuel Usage: If you refer to page 3-7 of the submitted application, you will find the estimated fuel use rates for the heaters. These were calculated using manufacturer data and the estimated fuel HHV. Fuel Use Rate (scf/hr) = Rated Input Capacity (MMBTU/Hr) * 10^6 / Fuel Use HHV (Btu/scf) Recommendations: XTO Energy, Inc. would propose no monitoring methods on the heaters as they are insignificant sources (refer to application page 3-7). For the RICEs we would recommend compliance with the NESHAP ZZZZ Area Source requirements for the appropriate engine category/classification, measurement of the site actual fuel gas, and actual engine runtime hours. Standard practice is to measure and allocate the site fuel gas through a common fuel header manifold. Individual meters on the equipment are not installed, however the permit represents maximum fuel consumption and maximum annual operating hours for each source. For the measurement of the actual fuel gas, we would measure the entire site fuel gas usage with a site fuel gas meter, however should an annual limit be included in the permit, XTO would request a 20% safety factor. Annual records of the actual fuel gas and RICEs runtime hours would be maintained by XTO Energy, and made available available upon request.

If you have any additional questions, or need further clarification please let me know. Thanks!

Thank You.

Rykki R. Tepe Environmental Engineer Environmental Engineer XTO Energy, Inc. 810 Houston Street| Fort Worth, TX 76102 Office: 817.885.1249 Cell: 817.253.2986 Fax: 817.885.2683 Email: Rykki_Tepe@xtoenergy.com

AΜ

Bonnie Braganza <Braganza.Bonnie @epamail.epa.gov Rykki_Tepe@xtoenergy.com 10/15/2012 09:12

CC Subject Re: Jicarilla Compressor Station Contact Information

То

I also missed the fuel usage meters- How do you determine the fuel use in the RICE and heaters? Also how do you determine the loading rates? Can you recommend some monitoring to determine the rates and calculations. POSITIONS or VIEWS EXPRESSED DO NOT REPRESENT OFFICIAL EPA POLICY

Bonnie Braganza P.E. US EPA Region 6 Air Permits Section Multimedia Permitting & Planning Division Phone:214 -665-7340 Fax: 214-665-6762

Remember Life Rewards Actions! If you continue to do what you have always done, you will get what you always got!

I would like to know the construction dates of the various pieces of equipment instead of the application stating pre xxxxx. I am sure since XTO took control of the operations, you are aware of the construction of the heaters and tanks. Please let me know when the heaters are being used for the tanks and dehydrators- Is it only during winter- even though it

states 8760 hrs. What is the purpose of the heaters- I do not get the process description. Also is it possible for you to send me the flow diagram via email microsoft word or pdf. Thank you POSITIONS or VIEWS EXPRESSED DO NOT REPRESENT OFFICIAL EPA POLICY

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From:	Rykki Tepe@xtoenergy.com
To:	Bonnie Braganza/R6/USEPA/US@EPA
Subject:	Re: Jicarilla Compressor Station - Contact Information
Date:	10/22/2012 11:31 AM
Attachments:	Attachment 2b - Jicarilla PFD 01-24-12.pdf

Bonnie:

nnie: As similar with the dehydration unit and flare, it was difficult to determine the actual construction dates of the equipment. With significant effort between XTO and the dehydration unit / flare package manufactures we were able to determine the manufacturing dates and approximate set dates of the dehy and flare unit. As mentioned prior, this information was not provided to XTO Energy at the acquisition. If you can not accept the pre-XXXX dates, I will have to start digging into the individual equipment manufacturing dates to see what I can find out. It is likely that I will not be able to find the construction dates with confidence. Please let me know if this is something you will need to proceed, as it will likely take significant efforts on operations and engineering. we would like to permit the heaters for 8760 to be on the conservative end. This will ensure that we will be permitted for the engines all year long. The heaters usage is dependent upon oil characteristics and weather. Tank Heaters purpose: Keeps paraffin in the liquid state to allow for transportation. transportation. Dehydration Heater: Boil off the water that was removed in the contact tower, and leave the glycol for reuse. This is done by raising the temperature to a level that will cause the water to evaporate but which is below the boiling point of glycol. Here's a link to a good site which describes dehy. If you click to the movie link on the left side of the screen it provides a great demo. Please keep in mind that not all dehydration units are designed like this, but it is a good visual for how dehys operate http://www.exterran.com/Products/production-equipment/gas-dehydration/glycol-dehydrator See attached below process description in pdf

(See attached file: Attachment 2b - Jicarilla PFD 01-24-12.pdf)

Thank You.

Rykki R. Tepe Environmental Engineer XTO Energy, Inc. 810 Houston Street | Fort Worth, TX 76102 810 Houston Street Fort Worth, Office: 817.885.1249 Cell: 817.253.2986 Fax: 817.885.2683 Email: Rykki_Tepe@xtoenergy.com

> Bonnie Braganza <Braganza.Bonnie@ epamail.epa.gov> 10/15/2012 08:40 ΔM

Rykki Tepe@xtoenergy.com cc Subject Re: Jicarilla Compressor Station Contact Information

То

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